

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

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

Country report: Hungary

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Research Project Report

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1. About the project

1.1. Overview of the Project

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

1.2. Methodological note

Authorship and review

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

In Hungary the CMPF partnered with Attila Bátorfy and Krisztián Szabó (Eötvös Loránd University, Media Department), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

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

Fundamental 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 women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

The digital dimension

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

The calculation of risk

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

Scores between 0 and 33%: low risk

Scores between 34 to 66%: medium risk

Scores between 67 and 100%: high risk

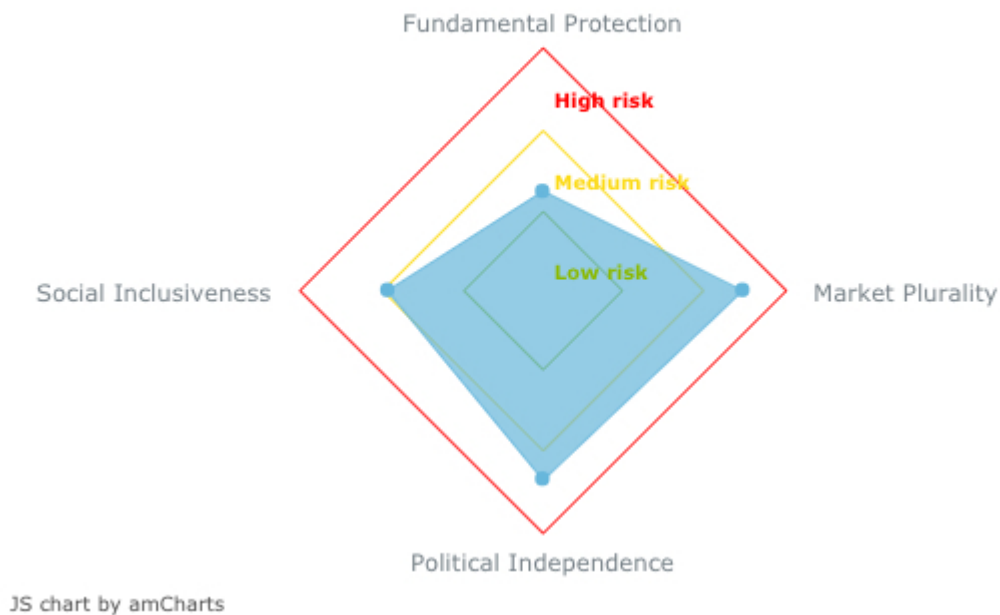
With regard to indicators, scores of 0 are rated 3% while scores of 100 are rated 97% by default, to avoid an assessment of total absence or certainty of risk.

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

2. Introduction

- **Population:** According to the last national census of 2011 (HCSO 2012), Hungary had a population of 9,985,000, but for 2020 it decreased to 9,769,526 (HSCO 2021a). It is also estimated to decrease further more, to 9,730,000.
- **Languages spoken:** Hungary is mostly a monolingual country, 99% of the population speaking Hungarian.
- **Minorities:** From an ethnic point of view the country is mostly homogeneous. According to the census of 2011, 16% of the respondents claimed to be from other ethnicity than Hungarian. The largest ethnic minority is the Roma, giving 3.1% of the total population (HCSO 2014).
- **Economic situation:** After a constant grow from 2015, Hungary's Gross Domestic Product was 149 939 Billion USD in 2020, which is 6,8% loss comparing with the previous year 2019. The GDP/capita decreased to 15 372 USD in 2020 (IMF 2021) due to the pandemic, which is a 6,7% loss comparing with the previous year 2019.
- **Political situation:** Hungary is a parliamentary democracy. From 2010 the right-wing/populist Fidesz-KDNP (Alliance of Young Democrats- Christian Democratic People's Party) coalition is in power winning three national elections consecutively in 2010, 2014 and 2018. In all three cases, the government had a two-third majority in parliament. The opposition is fragmented.
- **Media market:** The Hungarian media market consists of a mix of public and private media and increasing local ownership influenced by the government. The market used to be characterized by a high level of political parallelism, party-colonization and instrumentalization according to the duopolistic political economy of the right and the left, but as the right gained significant power, it is better to say that most of the market actors, even independent outlets are controlled largely by the government, and not by different parties, or business interests. Trust in media and journalism is extremely low (DNR 2019), and polarised, which means that the audience tends to trust only in those news outlets, which serves their political/ideological positions (Mérték-Medián 2021).
- **Internet:** The internet penetration is high at 87,6% (HCSO 2021b), and the proportion of regular internet users is 75% (HCSO 2018), which is 8% lower as the EU27 average. Online media and social media intermediaries are the most important information sources, but television still plays a key role in the news ecosystem (DNR 2019). Hungary's internet users are using mostly Facebook; other social media platforms, such as Twitter, are not popular.
- **Media regulation:** The Hungarian media's main regulatory body is the National Media and Infocommunications Authority (NMHH) guarding over the rights and stipulations laid down in the Media Act 2010.
- **Impact of the pandemic on the media sector:** The government did not take almost any steps to support the media sector, except that television channels and radio stations did not have to pay the mediaservice charge to the Media Authority. Still, the economic impact of the pandemic on the media sector was not so severe as was expected by preliminary reports and estimations by market research companies and professional associations. According to the Hungarian Advertising Association the advertising revenues of the media market (television, radio, online, print) decreased only by 1,4%, but if we break up this data to the subsectors, only the online sector grew by 5,5% (mainly due to the global platforms), the other sectors suffered losses between 3,8% and 11%. None of media companies ceased operating.

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



The degradation of media pluralism in Hungary continued in 2020, and the results in the MPM clearly reflect on this process. While the areas of Fundamental Protection and Social Inclusiveness still show a generally favourable view, the risks related to Market Plurality and Political Independence increased further in the last year.

This duality might be surprising at first, as we would expect these areas to show similar results and not to be either independent, nor separable from each other. However, this separation can also explain the hybrid state of the Hungarian media system: while the market is controlled by rules more or less in line with European standards, but they not just remain formal, but are intended to, and those rules are systematically disregarded.

Political influence over the implementation of laws, surveillance of the market, as well as direct and indirect governmental control can all influence the pluralism and political independence of the media. In a pandemic-stricken 2020, the political takeover of the country's leading online newsroom Index.hu, Klubradio's loss of its broadcast frequency, the newly emerging evidence about internal censoring at the PSM, or the opaqueness of information connected to the pandemic all contribute to the explanation of the underwhelming scores in the Market Plurality and Political Independence areas. These scores do not only reflect the developments of the year 2020, but they are also signs of a tendency that started years earlier, and which have also been analysed in earlier editions of the MPM. Concerning the Rule of Law, media regulatory authorities and bodies, the transparency of media ownership and the protection of journalists are all highly important aspects, which we will describe in more detail in the following points:

- **Media regulatory authorities and bodies:** The Media Act of 2010 asserts the independence of the Media Authority and the Media Council, and the election of members is, at least formally, a parliamentary procedure. Nevertheless, the ruling coalition FIDESZ-KDNP elected, by their power of having a two-thirds majority in the house, the body of the Media Council all by itself, without considering the nominees of the opposition parties, both in 2011 and in 2019. This highlights the fact that the formal

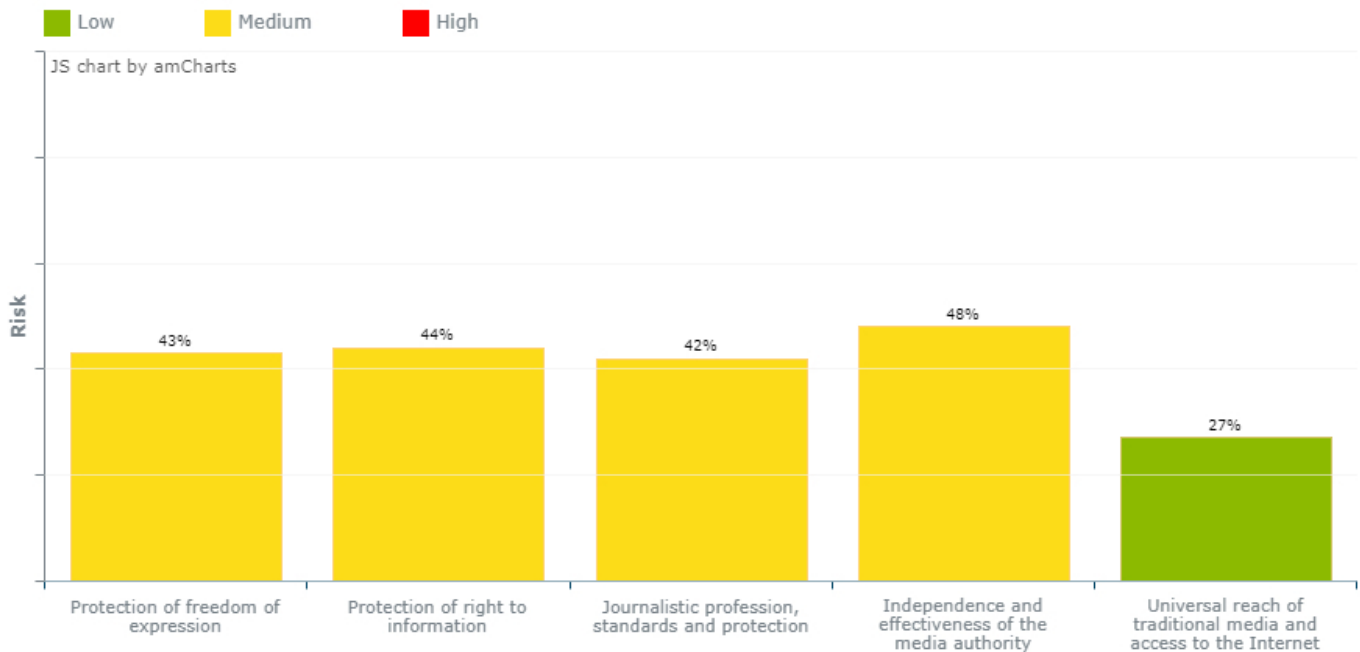
control of the Media Law on its own is by no means a guarantee of the political independence of the Media Council.

- **Transparency of media ownership and governmental interference:** although media ownership transparency is provided on paper, the situation on the ground shows that many media companies are controlled by the government. The problem, once more, is the close connection between said owners and the government. While in 2019, the founding of the pro-government media conglomerate KESMA (bypassing the Media Act and breaching competition rules) was in the centre of attention (Brogi et. al. 2020), in 2020, the most notable event was the political takeover of Index. This, once again, proved that the appearance of a pro-governmental proprietor can lead to disruption in the autonomy of the newsroom in a short period of time.
- **Framework for journalists' protection:** in Hungary, no law guarantees the protection of journalists, their rights and duties depend on the fundamental rights and on media regulation. The Hungarian law does not include any regulations against the online harassment of journalists. At the same time, physical violence against journalists hardly ever occurs in Hungary.

We must conclude this introduction in a similar manner as in previous years: although the regulatory framework seems to formally satisfy the standards associated with fundamental laws, media plurality or political independence, in practice, regulation cannot guarantee the diversity and plurality of the media. One of the reasons for this is that the ruling party exploits its powers as it is supported by a two-thirds majority in the house, and is willing to override any laws by decree in order to reach its political goals. Moreover, the ruling coalition is also able to use substantial amounts of public money to organise campaigns or support the aligned media.

3.1. Fundamental Protection (41% - medium risk)

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



Protection of freedom of expression (43% - medium risk)

Freedom of expression in Hungary is guaranteed by multiple laws (Article IX. Paragraph 1 of the Fundamental Law 2011, Article 3 of the Media Act 2010, Article 4 of the Act on Freedom of the Press 2010) conforming to international conventions. However, in reality, there were numerous cases when these laws were breached, or the judiciaries interpreted them in a manner diverging from adherence to the application of already available jurisprudence (see *Contributions* 2021). The so-called "Authorisation Act" (Act on Protection Against the Coronavirus Pandemic 2020) put in place in March 2020 because of the coronavirus pandemic, changed certain rules of the Criminal Code 2012 as well. Section 337 of the law defines that "(1) At the scene of some public emergency (public danger), any conduct of claiming or spreading a false or distorted statement before the wide public in connection with the public emergency by which to violate public order or disturb the public peace at a place of public emergency is guilty of a felony punishable by imprisonment not exceeding three years. (2) At the time of a Special Legal Order, any conduct of claiming or spreading a false or distorted statement before the wide public by which to endanger or derail the successfulness of the defence is guilty of a felony punishable by imprisonment from one to five years."

Both of these passages were criticized by professional organizations and non-governmental organizations (*Contributions* 2021: 44, HCLU 2020). According to them, the ambiguousness of the wording of the passages could easily mean that even the disclosure of factual information can cause disturbance, and thus make it eligible to have proceedings initiated against the declarer. Even against journalists who do their job by reporting factual information. Nothing of this manner happened however, only minor investigations were initiated against a few Facebook posts, which would have violated criminal law even before the amendment. There were numerous cases in the near past when people lost their jobs for publicly disclosing their opinion. The latest of these cases was that of the sports commentator Janos Hrutka, who shared a pro-LMBTQ post of Péter Gulácsi (goalkeeper of the Hungarian national football team), which initiated his lay-off by pro-governmental sport channel Spíler TV. The channel denied that this would have been the reason behind the dismissal. To make things even more complicated, TV2 Group (which owns Spíler TV) is openly supportive of the government, while having private ownership. The question was once again raised whether a private company has the right to dismiss an employee for an opinion that clashes with the values of the company, in this case the same values also communicated by the government. Another case was of Árpád Tóta W.,

a journalist at the weekly HVG, whose 2018 opinion piece the Supreme Court found to be capable of insulting the honor of the "nation of Hungary". It must be emphasized that restriction of free speech is not only caused by laws, but also by self-censorship, as people can easily lose their livelihood or voicing critical, but valid, opinions.

Protection of right to information (44% - medium risk)

The right to access public information is explicitly recognized by Art IV (3) of the Fundamental Law (2011) by the Act CXII of 2011 on the right to informational self-determination and on the freedom of information (Act CXII 2011) and the so-called „Glasspocket Law” (2003) on the transparency and accountability of public bodies.

Once more, despite the law formally guaranteeing these rights, in reality, there were many setbacks. The Lex Atlatszo (2013) made the access of public interest information even more difficult. The Hungarian government quit the Open Government Partnership in 2016 because of other member states' criticism aimed at Hungary. The President of the Parliament, the FIDESZ-member László Kövér minimised, and thus restrained journalists' ability of asking questions in the Parliament. There are more and more government contracts that the government deems as being of strategic importance, and thus classifies for decades, without providing any substantive reason for abridging the public's right to know. In 2020, justified as a vital step for the fight against the pandemic, by means of the so-called Authorisation Act (2020), the time period of 15+15 days of response to questions and requests to the government was increased to 45+45 days, meaning that even three months can pass between the initial request for information and the official response provided to it. Since the current rules do not guarantee that these public information requests get fulfilled, most cases end up in courthouses, but jurisdiction almost always took the requesters' side in these cases. However, even judiciary practice is powerless if this information is disclosed in an unreadable, unusable format. Nonetheless, many institutions do not reply to these requests, or deny the disclosure of the information (*Contribution 2020: 35*), and fewer journalists are willing to take these cases to court. During the pandemic, the government shares little information with the public, terminated their press conferences, and generally do not respond to the questions and FOI requests of journalists (*Contribution 2021: 42*).

Classifying certain types of government investments, contracts and businesses is also an increasingly used method of denying access to public information. This method was used when journalists wanted to receive the contracts and the documentation of the Paks II Nuclear Powerplant, the Budapest-Belgrade Railway Project, or when journalists wanted to know who and when flew with Hungarian Air Force's aircrafts for private purposes to Dubai, Las Vegas and Panama. Denying press credentials to the Parliament or to election and party events is also an increasingly common phenomenon in Hungary. Private television channels cannot take footage of plenary sessions of the Parliament. The President of the Parliament, Fidesz MP László Kövér ordered that the press can ask questions in the Parliament only in a very restricted area, which area is rarely used by politicians. Independent media are given a chance to ask at government press conferences only occasionally. The same denial of questions from “anti-governmental” journalists was commonplace during the daily press conference of the Operative Body Concerning the Protection against the Coronavirus Pandemic (Operative Body in short). Given the meagre data published about the coronavirus pandemic in Hungary, one way to find out vital information about the pandemic is by means of journalists asking questions on these press conferences. However, most of the questions that get answered come from government-aligned outlets, leaving little to no room for the independent press. The official government information site of the Pandemic in Hungary offers the least information and data to the public

in the CEE Region (Szabó and Szopkó 2021a), and its also used for propagandistic purposes (Szabó and Szopkó 2021b).

Journalistic profession, standards and protection (42%, medium risk)

Access to the journalistic profession is open for everyone, but the trust and the honor of the profession is exceptionally low. There are also certain socioeconomic and cultural barriers to be considered. News companies seek young talents as interns for very low or no wages, therefore most of the talented young people choose other professions like advertising or public relations. Most of the currently active journalists did not study journalism at schools or at workshops, lack of professionalism and erudition is a significant problem among them.

Although there are many professional unions and associations (the largest is MÚOSZ, the National Association of Hungarian Journalists with around 5,000 members) with clear self-regulatory guidelines based on international standards and classic doctrines, the polarised media system cannot hold the journalists to these standards, and the standards are often overruled by partisanship, preconceptions, party-loyalty and ideological positions. Even the different unions are associated with the left and the right, and their reputation is very poor. In some newsrooms, we can find a workers' council, that represents the rights and benefits of journalists within the media company or the management team.

Currently, there are no collective contracts protecting journalists' rights, and the former plans on regulating the area vanished by now. The most recent idea of a Press Chamber came from pro-government journalist György Szöllősi, and according to the concept, the membership would not be mandatory, but only those journalists could get access to governmental and public information who were members of the chamber. The concept also contained points on labor rights. For example, those media companies which are members of the chamber should provide employment contracts for their journalists, working with freelancers or having other kinds of contractual relations would not be possible. The concept also included a minimum wage for journalists. The idea of the Press Chamber came to light twice in the past two years, but most of the independent journalists were skeptic about the intentions.

For the protection of journalists' working conditions, there is no special law. Journalists fall under general labor laws. Because of the pandemic, multiple media companies had to introduce restrictions within newsrooms, many colleagues were laid off, or had their wages reduced. Many professional organisations and unions highlighted the problem and asked the government to provide financial support to journalists during the pandemic, but it did not happen.

Independence and effectiveness of the media authority (48% - medium risk)

The National Media and Infocommunications Authority (NMHH – Media Authority) was established by the Media Act 2010. According to the Media Act 2010, the main objective of the Media Council is to guard and shape the media landscape by enforcing the stipulations of the law regarding pluralism, editorial independence, ownership, frequency allocation, fair competition, child protection and overseeing the operations of the PSM. The Media Law formally guarantees the independence of the Media Authority, but the appointment procedures do not provide adequate legal safeguards for independence when a government has a two-thirds majority in the Parliament. In these cases, the composition of the Media Authority and the Media Council depends on the government's will. Ever since its establishment all five members of the Media Council were nominated and elected by the Fidesz party for nine-year terms. The

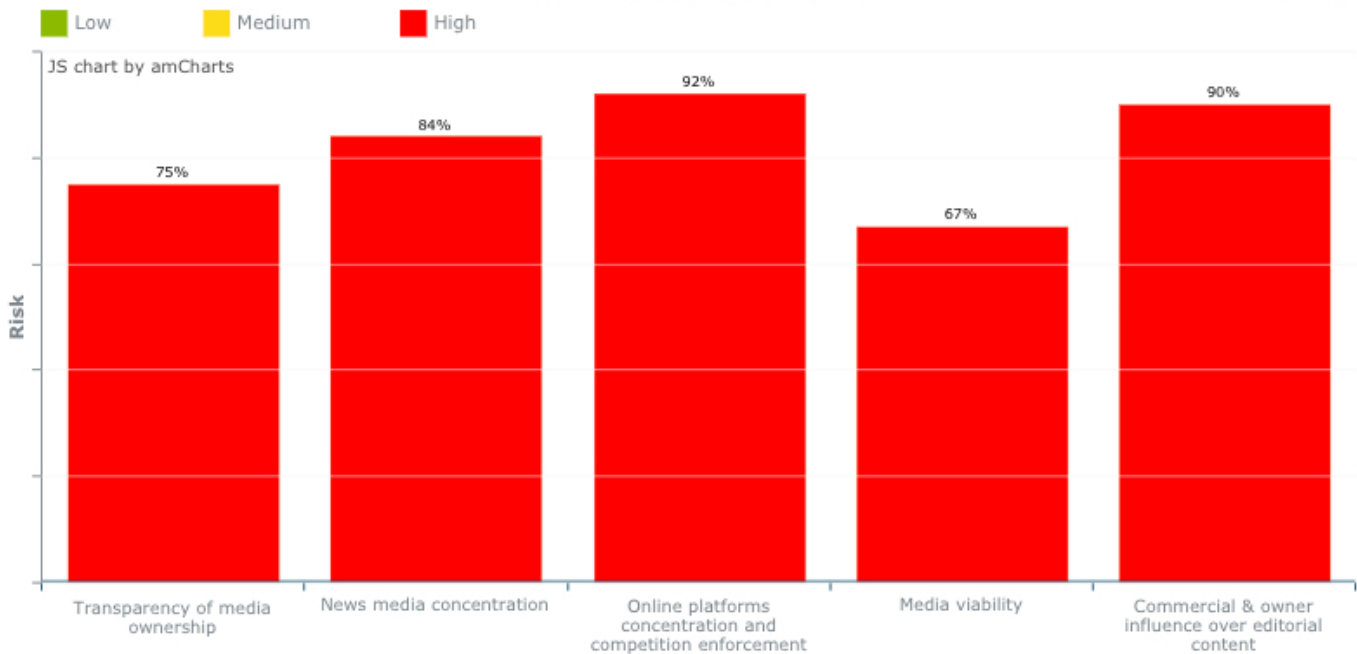
president of the Media Authority and the Media Council is the same person, appointed by the president of Hungary based on the nomination by the prime minister. While the rules of eligibility and incompatibility for the members are specified in the Media Act 2010, they do not ensure objective and transparent procedures in practice. The last election of the members of the Media Council took place from September to December 2019. While oppositional parties had presented their candidates by the September deadline, governing parties Fidesz and KDNP did not manage to do so, still, they outvoted the candidates of the opposition until they found their own nominees. The procedure lasted until December, all the four new members of the Media Council are delegated by the governing parties. The Media Council is ineffective to enforce some of the most important aspects of the Media Act 2010. The Media Council refuses to enforce some of the most important aspects of Media Act 2010, while its licensing practices run counter to the Act's pluralism provisions. For instance, allowing for the one-sided, propagandistic news coverage in all public-service radio and television channels is a violation of the Media Act's "balanced coverage" tenet. At the same time, its licensing and de-licensing decisions have handed, over time, all radio and most television frequencies to government-supporting owners or management. In the near past, the case of Klubradio was in the center of attention. Klubradio had for a decade been Hungary's last remaining independent news and talk radio. For the frequency of Klubradio, the Media Council called for new tenders in November 2020. To this, besides Klubradio, Spirit FM – a radio connected to the government-friendly but liberal-leftist ATV –, and pro-governmental LDK also applied for the tender. The Media Council requested Klubradio to complete their application and disqualified two other applicants from the tender. In March 2021, however, the Council decided that the application of Klubradio is insufficient in many aspects, and gave the frequency temporarily to the previously disqualified Spirit FM, without calling a new tender. The chief executive of the radio promised that there will be room for the opposition and for critical voices on the radio as well.

Universal reach of traditional media and access to the internet (27% - low risk)

Article 11 of the media law guarantees the existence of the Public Service Media, but universal access is not specified. All public service television channels are distributed via digital satellite and terrestrial broadcasting and can be accessed by more than 99% of population via DVB-T. The coverage of public service radio channels varies from 70% to 99% according to the channels and the types of the receiver. The print media distribution market is duopolistic, the two main actors are the private Lapka and the state-owned Magyar Posta (Hungarian Postal Service), the latter will discontinue its delivery service by mid-2021. Problems with the delivery of newspapers to small villages still persist. The internet penetration in Hungary is 87%, universal access to broadband has not been achieved yet.

3.2. Market Plurality (82% - high risk)

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



The risks to media pluralism scores high risk overall, mostly due to media ownership, news media concentration and commercial and ownership pressure over editorial content. The indicators in the market plurality area remained largely unchanged compared to the MPM2020, except for media viability where the risk increased from 27 percent (low) to 67 percent (high). While in previous years the overall risks to media viability were kept low with the help of selectively allocated state advertising (Bátorfy et al. 2020), this year the COVID-19 pandemic has led to significant decreases in revenues, which could not be offset even by an increase in state advertising spending (media-specific direct or indirect subsidies were not introduced). Market plurality is the topic of many ongoing debates. While many independent or not government-aligned media outlets were closed down in the past few years in Hungary – all the while giving room to the growth of government-friendly media –, the government evaluates this period as the exact opposite of what has happened: according to its representatives, the media market has become even more diverse due to an increase in the number of rightwing news outlets. This interpretation treats the dwindling independent scene as if those outlets were ideologically or politically driven and homogeneous.

Transparency of media ownership (75% - high risk)

In theory, the ownership of the Hungarian media market is transparent. Every Hungarian business is obliged to disclose their owners, and this information is freely available to anybody. There is no special regulation on this issue on the media market, the media companies have to inform the Media Council about any change in their ownership and about their media products. Nonetheless, the MPM implementation shows a high risk, as the legal provisions, and the Media Council itself fall short in guaranteeing effective transparency for all media and effective and easy access to the relevant information by the public, particularly for the disclosure of ultimate and beneficial owners of media outlets.

While the ultimate or beneficial owners often use proxies and middlemen, or build multi-layered company structures to obscure themselves, journalists still have a chance to investigate ultimate beneficial owners behind companies. A more serious problem emerged this year through the court-interpretation of the GDPR-regulation which may have influence also on the transparency of media ownership. A company sued the Hungarian edition of Forbes because the magazine informed their readers about the owners, assets and financial data of a commercial company (IPI 2020). The court ruled that while information about the

company can be found by journalists and citizens from company registry data, it does not mean that they are authorized to share this information publicly without the consent and permission of the given company. This interpretation of GDPR would practically put an end to the transparency of ownership in the media too; at least from the point of view of the public sphere.

The transparency of ownership alone has no real effect on media pluralism, if these owners are not independent from the government or from political parties. KESMA is a good example how the control of ownership transparency cannot solve the problem, since all of the media companies connected to KESMA were government-aligned and followed a similar agenda before joining the state media foundation, only their owners were different.

News media concentration (84% - high risk)

News media concentration also scores a high risk at 84%, same as last year. Most of the well known cases from the previous years, especially the creation of pro-government media giant, Central European Press and Media Foundation (KESMA) were explained in last year's report (MPM 2020, Brogi et. al. 2020), but in 2020 the pro-government information dominance became even more stronger with the takeover of Index.hu. When Miklos Vaszily, an Orban-aligned businessman, took a 50% stake in the company that controls the outlets advertising revenues, the newsroom started raising alarm. A few months later, the editor-in-chief was let go, and in turn almost the whole newsroom quit (BBC 2020). The leaving journalists were replaced, but Index.hu has tuned back on critical journalism. In November 2018 a dozen of government-aligned media owners offered their companies to the KESMA without any financial compensation. As a result almost 500 media titles, including television and radio channels, nationwide and local newspapers, tabloids, magazines, and online news sites became part of one media giant, also making it at once dominant on several crucial markets. According to the Media Act, this merger could not be possible. But with a decree signed by Prime Minister Viktor Orbán, the government labelled the company as a strategic national interest. In this case, another law from 2013 applied, which was also passed by this government, and which allows the government to take out companies from the supervisory process and approval of the Competition Authority. The Competition Authority argued that in the absence of authorization they cannot intervene, and the Media Council – which still had legal authorization to ban the process – accepted the decision of the Competition Authority. This example highlights that in cases when the the arbitrary interpretation of the competition and media law is not enough, the government can simply use another law to further its interests. On certain sub-media markets, like regional newspapers, daily newspapers, radio and television market there are over 60% pro-government dominance, and only on the online news market there is more space for independent outlets (Bátorfy 2020).

Online platforms concentration and competition enforcement (92% - high risk)

Currently there is no market and platform-specific regulation for preventing online platforms concentration and competition enforcement. Most pro-government online platforms are consolidated and centrally managed either under KESMA or the public-service media, thus their seeming diversity is void of meaningful pluralism; on the other hand, the ownership of the government-independent on-line scene is veritably diversified, with only rare cases of common primary or final owners. According to the Hungarian Advertising Association, 59% of the advertising revenues of the online media ecosystem went to online platforms like Facebook or Google in 2020 (HAA 2021). There were initiatives of taxation and regulation of these platforms both by the government, the opposition and the market actors, but these initiatives are still under development.

Commercial and owner influence over editorial content (90% - high risk)

Commercial and owner influences, even if stark, are quite diversified across the non-governmental media. While opposition parties do have online ventures of their own, most non-governmental media expressly avoid party-political influences, and exert criticism in all political directions. On the other hand, commercial, owner, and political influences are thoroughly centralized in the case of KESMA and the public-service media. These outlets uniformly and openly join forces with the governing parties' political campaigns.

Commercial and owner pressure is part of the daily journalistic job, which results in sensationalism, polarisation, shady advertising methods like unmarked advertorials and PR-interviews. The pressure on journalists comes mostly indirectly from the editors and the management (Mérték 2017), and only rarely from the owners. Hungarian journalists generally find market pressure more problematic than owner pressure – according to their reasoning, the owners themselves and the editorial line of the medium are known information, and they are aware of what they are signing up for. By this logic, direct pressure from management to create any kind of political content is rare, since most of the journalists know what kind of medium they are working for, with the expectations clearly disclosed, let it be an objective newsroom or an outlet that aims at propagating the interests of the government.

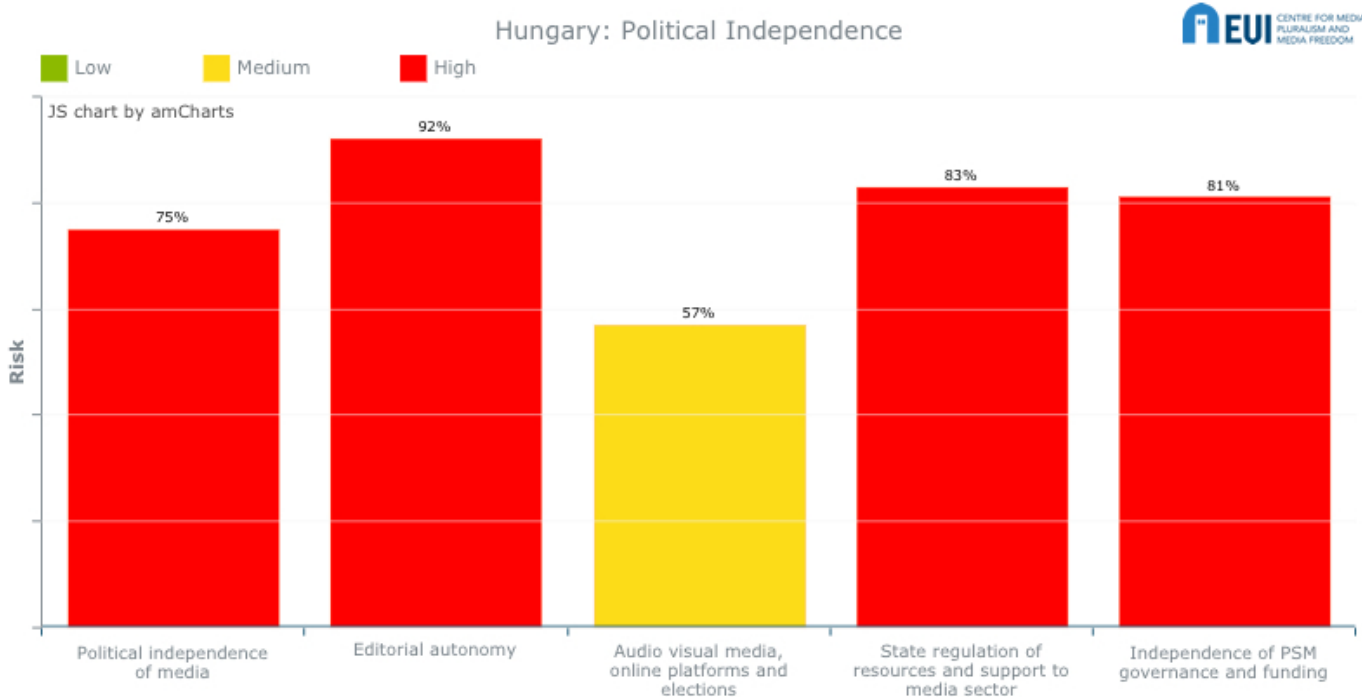
Media viability (67% - high risk)

The first and second wave of the COVID-19 pandemic has led to a significant increase in risks to media viability. This is in large part due to the decreasing advertising revenues. In 2020 the Hungarian media market (television, print, radio, online) suffered a 1,4% overall decline from 631 million EUR to 622 million EUR in revenues (HAA 2021), which resulted in a way more better performance than the preliminary studies (Whitereport 2020, CANnual Report 2020) predicted during the first wave of the pandemic. The online sector grew by 5,5%, television, print and radio decreased by 3,8%, 10,6% and 11% respectively. The remarkable increasement on the online market is - according to the Hungarian Advertising Association - due to the global platforms, their share was 59% from the total advertising revenues of the online market. The revenues of the media companies are not public yet, but these losses did not affect each company equally. During the pandemic, numerous newsrooms had to introduce restrictions, pay cuts, and according to a survey (Média1 2020), 21% of the responding journalists earned less than in 2019. Most of the media companies did not lay off their staff but introduced salary-cutting measures to keep the level of content production and quality. There were also some reasons for hope in the case of online startups that have successfully experimented with new revenue sources, such as crowdfunding and subscriptions. It must be noted, however, that the increase in the income of the media sector in the past few years was mostly thanks to the increase of state advertising revenues (Bátorfy and Urbán 2019), and those media companies which rely mostly on these revenues, could be affected less by the setbacks. The Hungarian state did not provide extraordinary subsidies to help media companies, except that the Media Authority let off the media content service fee for the audiovisual sector. However - according to the data obtained from advertising research company Kantar Media - the Hungarian state spent more with 13,8% on state advertising (incl. billboards) than in 2019. 85% of state advertising went to pro-government media companies.

3.3. Political Independence (78% - high risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of public service media.

Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and availability of plural political information and viewpoints, in particular during electoral periods.



Political independence and media pluralism are interconnected, the two can hardly be separated from each other. Parts of the Hungarian media landscape traditionally depended on political parties and political decisions, following the regime change of 1989 (Bajomi-Lázár 2018). Significant progress towards plurality was brought forth by the appearance of online media in the 2000s, but in the end, as of today, two of the biggest independent news sites (first Origo, then in 2020, Index) found themselves under governmental control.

Political Independence of media (75% - high risk)

The Media Act sets up certain provisions restricting political parties and politicians from providing audiovisual service (Act CLXXXV of 2010 on Media Services and on the Mass Media, sections 43 and 46). But political parties and politicians (except members of local governments) can own newspapers and online news sites without any restrictions. Almost all political parties have their own, mostly online, propagandistic news media, but there are some politicians who run professional news outlets too, like Péter Ungár, a member of parliament for the green party 'Politics Can be Different', who owns different small, local news sites, and the Budapest-based Azonnali.hu, but he also used to have a share in the pro-government weekly newspaper Figyelő through familiar ties. Even so, direct political influence or control over media is not common in Hungary, but indirect influence via proxies, strawmen, government-aligned investors and business ties is one of the main characteristics of the Hungarian media market. The traditional duopolistic division of the media market between the left and the right was dismantled by the Fidesz-KDNP government after 2010, and the aim of the government to have a loyal, non-critical media eventually led to the creation of the media conglomerate KESMA in 2018, in addition to the strict governmental control over the PSM, obtained already in 2011 via the Media Act. The remaining independent media is often targeted by smear campaigns, and some of them are controlled through their access to state advertising. In 2020, another influential independent news media website got under governmental control: Index.hu. Through its

complicated history, Index was many times a target – mostly because of its owners – of both right-wing smear campaigns and accusations of being controlled by the government, but in 2020, the government-aligned entrepreneur Miklós Vaszily purchased shares in Indamedia, the commercial owner of Index. Vaszily was the chief executive of Index in the past, and after 2010, he assisted the new, politically motivated buyers to acquire the Origo news site. Vaszily has an interest in a number of outlets: after the acquisition of TV2, he became the chief executive of the TV station, and was also the investor of the pro-governmental television channel Pesti TV. At Index, the tensions between the new owner, the manager, the experts appointed with the reorganisation of the newsroom and the whole editorial staff reached its peak in the summer of 2020. Following the dismissal of the editor-in-chief, most of the journalists decided to quit. The management of Index dismissed the editor-in-chief stating that he disclosed confidential information to other media about the board meetings. In the autumn of 2020, the departing editorial staff started a new news site called Telex.hu, which found immediate popularity on the side of the Hungarian audience that is interested in critical content. In the meantime, at Index, many new journalists were invited for the free positions, promising a balanced editorial line. However, the newly appointed editor-in-chief at Index resigned after only four months, stating that management wanted to influence content and the composition of the editorial staff.

Editorial autonomy (92% - high risk).

This is currently the highest risk level in the entire Hungarian report. It's not surprising that pro-government media is not independent from politics; while the government makes it difficult for independent media to exist at all. The fierce competition for a declining amount of advertising, the often politically motivated decisions by regulators and courts, as well as the fabricated, "kompromat" campaigns against independent journalists and owners contribute to an atmosphere of fear and intimidation. This has a visible chilling effect on critical journalism. In the case of the independent online news outlet Index in the summer of 2020, the increased political influence has also meant the end of the site as we know it. With new, government-friendly actors being placed in the editorial committee, the fear from political influence and distrust in the new leadership led to the resignation of most of its journalistic staff. Although the news site is still functional, it lost its core reader base, who have shifted to the old staff's newly-created, donation-based outlet called Telex. In addition – as we discussed before – some parties on the opposition side have their own media, and they also spread mostly sensationalism, disinformation and propaganda.

Audiovisual media, online platforms and elections (57% - medium risk)

According to the Media Act of 2010 and the Code of Ethics of the Public Service Media, the PSM channels and services are expected to provide fair, balanced and impartial representation of political viewpoints in news and informative programmes (Act CLXXXV of 2010 on Media Services and on the Mass Media. Section 96). This key principle, however, is not implemented in practice. Even the Media Authority has in several occasions found that the PSM is gravely biased and uncritically partial towards the government. In November 2020, Radio Free Europe published recordings leaked from PSM newsrooms, where two editors threatened journalists in the run-up to the 2019 EP election. They said: in case some colleagues do not feel comfortable making reports and analyses of situations according to the governmental standpoint, they are free to leave. The Media Council refused to deal with this revelation. The law stipulates that during electoral campaigns the PSM shall guarantee equal airtime for political advertising for all parties without financial compensation. Private channels can decide whether they want to provide airtime to political advertising or not, but they cannot receive money from the parties. Political advertising outside of the electoral campaign period is not allowed for political parties. But the government can advertise. This practice was attacked by

the opposition and NGOs. However, the Media Authority ruled that government advertising does not count as political advertising, but has to be seen as a “public interest message”. Much of the government's big-budget advertising is clearly political. For example, the referendum campaign against 'Brussels', or the promotions of the government's anti-migration and anti-civil society questionnaires were all managed under the label of "public-interest information", without granting the same right to the concerned entities. Following the elections, all political parties have to disclose their advertising expenditures, apart from online political advertising, which mainly takes place on Facebook and is unregulated and non-transparent. The data provided by Facebook have raised some questions on methodology in Hungary.

State regulation of resources and support to media sector (83% - high risk)

There is no legislation regarding the distribution of direct or indirect state subsidies to private media. The state is the largest advertiser in Hungary (Bátorfy and Urbán 2019). In 2019 the Hungarian state (the government, state owned companies, ministries, public institutions, municipalities, etc.) spent 320,000,000 EUR on advertising (Bátorfy 2020), which was approximately one third of the total advertising revenue of the market. In the year 2019, it is estimated that 75% of the total expenditure went to government-aligned media (private and public). The share of state advertising in the revenues of government-aligned daily newspapers was estimated to be, on average, 75%. For weekly newspapers this number was 92%, for television stations 95%, for online news media 90% and for radios 90%. The weight of state advertising on the market is disturbing, which provides an incentive for some independent, or critical media also to build one part of their business model around state advertising.

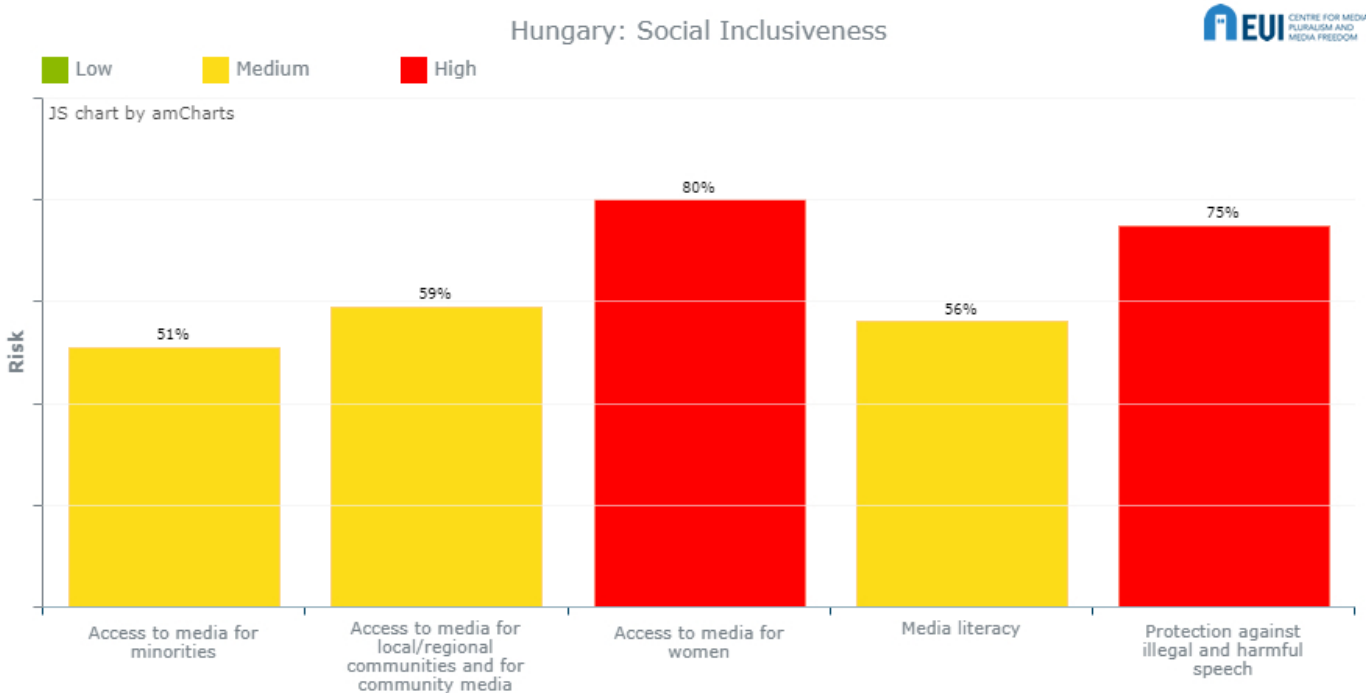
Independence of PSM governance and funding (81% - high risk)

State support provided to the PSM is growing annually. In 2020 the publicly funded budget of the PSM was nearly 290,000,000 EUR. This means that the PSM is the largest media company in Hungary. The Media Council is responsible for approving the Media Services and Support Trust Fund's (MTVA) annual plan and subsidy policy and for determining the rules governing how MTVA's assets can be used, managed, and accessed by the public media. The Fund's annual budget is approved by the Parliament. There is a lack of transparency, civil control and oversight over the budget of the Fund. The PSM is supervised by a single body, the MTVA, which is managed by the Media Council, a body composed of five members who were all appointed and elected by the governing majority. The chairperson of the Media Council appoints, sets the salary for and exercises full employer's rights over the MTVA's director general, deputy directors, as well as the chairperson and all four members of its Supervisory Board. PSM channels themselves are small nominal-only companies, while the overwhelming part of state budget for the PSM goes to a separate content provider, MTVA. Despite of which the tenets of the Media Act regarding independence, balanced coverage, and pluralism do not apply to MTVA. Thus the inclusion of MTVA means that both the public-service media and their actual content provider MTVA are effectively removed from any scrutiny. Complaints against what has been aired at the PSM have invariably been rejected on this "legal" basis.

3.4. Social Inclusiveness (64% - medium risk)

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

extreme care.



Similarly to previous years, Social Inclusiveness is very difficult to research. This is partly because there is a limited amount of relevant or current data and research about the area, and partly because the researchers working in this area mostly focused on other aspects of the topic, and also because resources to conduct extensive research is insufficient.

Access to media for minorities (51% medium risk)

The 2010 Media Act guarantees access to the public media for various groups, including ethnic, religious, local and regional communities, as well as for people with disabilities. However, minorities which are not recognised by law do not have access to airtime, especially on private television and radio channels. According to the National Media and Telecommunications Authority, neither the thirteen recognised, nor other minorities have their own programmes and airtime on commercial, private television channels (NMHH 2017). In recent years there have been a number of civic initiatives aimed at producing minority programming as well as at providing education for minority journalists. The PSM has a weekly Romani programme the Roma Magazin, and in March 2019 a private company launched the first Roma television channel, the Dikh TV, which produces not only television shows, but also music videos for Roma popstars. The Dikh TV was bought by a government-aligned interest group in 2020. Modern Roma popular culture is not represented in the PSM, neither on large private television and radio channels, but these videos are extremely popular on Youtube and their viewership largely overperforms most of the Hungarian popular music production. The representation of Roma people is very poor in the national culture. Their roles in Hungarian movies, television series and talk shows are limited, stereotypical and highly caricaturised. The usual role for Roma actors is the criminal, the deviant, the drug addict, or the loud, the harsh, and the “gypsy musician.” The diverse, modern, high quality Roma culture is thriving on Youtube and on Facebook.

Access to media for local/regional communities and for community media (59% - medium risk)

Access to media for local/regional communities and for community media poses medium risk, and it

increased from 31% to 59%. This is mainly due to the situation that all the regional newspapers are owned by the KESMA, and free newspapers published by the local municipalities with a few exceptions, but they are not independent from the local municipalities. Community media are awarded access to media platforms through tender procedures and decisions carried out by the Media Council. The 2010 Media Act specifies a range of programming provisions and obligations for linear community media. According to these provisions, community media are “a) intended to serve or satisfy the special needs for information of and to provide access to cultural programmes for a certain social, national, cultural or religious community or group, or b) are intended to serve or satisfy the special needs for information of and to provide access to cultural programmes for residents of a given settlement, region or reception area, or c) in the majority of their transmission time such programmes are broadcasted which are aimed at achieving the objectives of public media services.” Since new media laws were passed in 2010, the community media sector has undergone significant changes that have radically reduced the diversity of Hungary’s community media sector. Community radio licensing has been highly politicised since 2010, due to the National Media and Telecommunications Authority (NMHH’s) tendering practices which have generally favoured outlets that provide government-friendly, conservative and/or religious programming. On December 21, 2019, one of the oldest community radios in Hungary, the Civil Radio was closed down after 24 years of existence, because the Media Authority did not give them the license to broadcast. The non-political Civil Radio was the only radio station dedicated to representing civil, non-governmental organisations.

Access to media for women (80% - high risk)

The Equal Rights Law 2013 guarantees women fundamental labor rights based on EU guidelines and frameworks. However, the issue of women’s equal representation in both the media and across all industries in Hungary is a persistent problem. The proportion of female board and management members in media companies is low. While gender issues are addressed in the media, it is still common to air only-male talk shows, among others on gender topics. Female experts are interviewed mostly on “light” topics, like gastronomy, lifestyle, maternity, esotery, psychology.

Media literacy (56% - medium risk)

At present, media literacy is mainly addressed under the National Curriculum, the country’s new educational policy launched in 2013. The objective of media literacy is to “help students become responsible participants in a mediated global public discourse and understand the language of both new and conventional media.” According to a 2015 study, efforts to centralize and homogenize media education along with the whole education system may hamper the above stated objectives. In addition, while the National Curriculum addresses digital literacy, poor IT infrastructures in schools combined with significant reductions in the number of IT classes under the National Curriculum threaten to exacerbate the digital divide among low income students and other social groups.

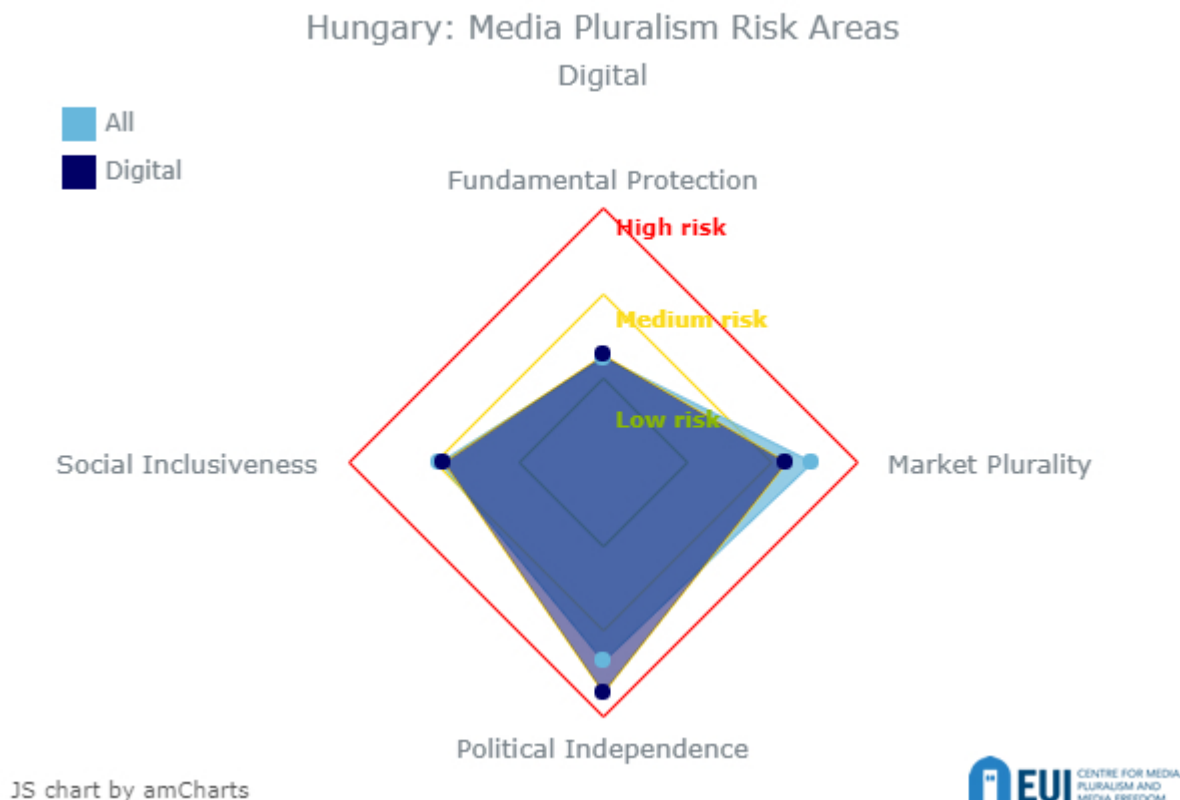
The 2010 Media Act also obliges the Media Council to promote media literacy. The legislation specifies that it is the obligation of the PSM to “promote acquisition and development of knowledge and skills needed for media literacy through its programmes and through other activities outside the scope of media services” (§82(2)(c)). In 2014, the Media Council launched a media and literacy education centre called the Magic Valley. The Council has also hosted at least one major international conference (Decoding Messages - Best Practices in Media Literacy Education) that involved input from a range of international experts. In addition, the Council has published a book and an educational film package on media literacy that can be used in educational programs and schools. There is no data available on the impact or success of the Media

Council's media literacy program. In the past few years some non-profit news organizations (like Átlátszó), and several NGOs (like Mérték, Televele, Független Média Központ, Urban Legends) launched media literacy programs for teachers, students and journalists. The workshops focus on fake news, digital tools, child-protection and surveillance. It is very difficult to measure their impact, but their reach is limited. We must also highlight the ambiguous role the PSM and the Media Council plays in media literacy programs. On the one hand, they have good workshops and their Magic Valley project is popular, but on the other hand, the PSM often spreads disinformation, and its editorial practices are highly questionable.

Protection against illegal and harmful speech (75% - high risk)

Although regulations that harmonise with national and international conventions should, in theory, provide enough protection against several variations of illegal and hate speech, in practice, the law is incapable of stopping the spread of these sorts of messages and media content. One of the reasons is the inconsequential practice of judiciaries, which take action against certain Facebook-posts, while dismissing others altogether. Another reason is that on social media platforms, there is a multitude of messages that count as illegal or hate speech, and currently it is impossible to limit them, neither by law nor by technology. The typical disinformations in 2020 were related to the source and effects of the pandemic, the vaccination, 5G, the US elections and the Qanon-theory. Facebook banned some online Pandemic-sceptical, and Anti-Vaccine Facebook-groups, as well as the police arrested some citizens for scaremongering and disinformation related to the pandemic and based on the State of Emergency law.

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



Just as last year, this year the MPM dedicates a separate section for assessing risks for media pluralism in the digital environment and amongst online media. Many issues emerged in the past few years, not only in academic but also in everyday discussions, as the challenges of the digital world are poorly addressed by Hungarian regulation and policy making. Certain topics, such as the regulation and taxation of digital platforms like Facebook or Alphabet, or online privacy are on the political agenda, but most of these proposals are only a part of the political communication, and are not really put in action. Regarding the entire media ecosystem, there aren't any specific regulations for online media, or any regulations which would try to deal with the challenges of the digital world specifically. This is true for almost all the areas and indicators of the MPM.

Fundamental Protection (42% medium risk)

The indicators on fundamental protection online all score medium risk, which is more or less in line with the overall scores for this area: protection of freedom of expression online scores 50%, journalistic profession standards and protection 40% and universal reach and access to the Internet is the lowest at 36%. The introduction of the GDPR in Hungary caused minimal problems for most of the media companies, but as we have seen, the good intentions behind the GDPR can be misused to hinder journalistic work. The universal principles shall be applied to everyone regardless whether someone is a normal citizen, a politician, a public figure or a powerful businessperson. The ongoing lawsuit against the local edition of Forbes shows the anomalies of the regulation and it can make impossible the journalistic work. The business magazine ranked the owners of the Hell energy drink on their annual "50 Richest in Hungary" list. The owners brought a suit against Forbes based on the GDPR regulation claiming that the magazine publicised some private information about their names, wealth, business. The court decided immediately to recall the Forbes issue from the stands, and the court later closed the process by fining the magazine to pay 4,5 million HUF. According to the court's interpretation of the GDPR, the right of knowing something does not mean the right

of publishing something, even that in this case the names of the owners can be known from public company records. Up to this date this was the only case when a powerful business entity used this argumentation to hide and cover their identity. Protection of journalistic work is very weak in Hungary on many levels. While formally surveillance of citizens is very difficult for state security agencies, we have seen in the past few years that countries take giant steps towards total surveillance by connecting databases, digital fingerprints, CCTV footages, voice recordings. Digital platforms like Facebook regularly sell data on citizens to questionable companies and political parties. These issues are still not addressed on the political level in Hungary.

Market Plurality (72% high risk)

The digital score for the indicators of Market plurality confirms the high level of risk, except for Media viability. Transparency of media ownership (88%), news media concentration (85%) and online platforms concentration and competition enforcement (90%). Media viability is at the higher end of low risk (33%), as the digital advertising market managed to grow, even during the pandemic, and some online startups experienced improvements in their utilization of alternative revenues. Commercial & owner influence over editorial control is somewhat less problematic in the digital environment than in the offline media, but still relatively close to high risk with a score of 63%. In the Hungarian media market, online media is the most diverse area, and the results of our MPM data collection reflect to it. The score of the subindicators of the market plurality are slightly better than the overall scores regarding ownership, news and platform concentration, competition enforcement and editorial independence, except the media viability, which poses low risk.

It seems that the Hungarian government is ever more determined to introduce the taxation of social media platform. In the meantime, government members' constant accusations of censorship on platforms and "shadow banning" by Facebook and Twitter are seen as mere threats against these platforms. The adverse economic effects of the pandemic were most visible in the online sector, although we must mention that crowdfunding, subscription and other alternative income sources were getting more popular among independent online news sites: almost all of the small and larger independent news media has one, or more alternative sources. Ultimately Telex, the news site founded by ex-Index journalists, started its operation based only on crowdfunding and subscription (later they received a large investment by a Czech billionaire). It seems that an ever growing part of Hungarian society realises that without their help, the space to sound democratic public opinions would continue to shrink.

Political Independence (90% high risk)

All digital indicators on political independence score high risk: political independence of media (97%), editorial autonomy (97%), audio visual media, online platforms and elections (92%) and independence of PSM governance and funding (75%). Although online media is the most diverse segment in Hungary, and, in general, online outlets experience more political independence than in other segments, governmental interference in the leading online newsroom and the opacity of online political advertisement lead to a high risk score.

As online media is the most diverse segment in Hungary, therefore outlets experience more political independence than in other segments. The biggest independent news portal in Hungary, Index.hu fell under governmental control in 2020, that's why the indicators of political independence and editorial autonomy poses high risk. However, the the newly founded Telex.hu became one of the most important news

providers in a very short time.

Political advertising is ever more prominent in Hungary. The data provided by Facebook on political advertising is still questionable and it is easy for political parties to evade rules by using proxies and intermediaries. Digital media, at the first glance, offer more equal, and democratic conditions for political parties in Hungary, because social media platforms are not influenced by the government. But this democratisation of the public sphere is a double-edged sword, because large social media platforms increase the voice of those who have financial means, regardless of the value and the truthfulness of their messages. According to some oppositional politicians and independent media actors, the altered Facebook algorithms discriminate against their posts; still, the access to the official Facebook-site of the government is not limited by any means. Because of these reasons, the subindicator online platforms and elections poses - again - high risk.

Social Inclusiveness (63% medium risk)

Digital-specific risks in the area of Social inclusiveness derive mostly from the assessment of digital competencies of individuals (50% - medium risk) in the country and from the limited effectiveness of measures taken to combat hate speech against vulnerable groups online (75% high risk). In Hungary, the percentage of population that has basic or above basic overall digital skills is 49, which represents a medium risk, and 31% of the population has very low overall digital skills. This accounts as medium risk. There are several Hungarian laws that were introduced with the aim of countering hate speech in accordance with the Constitution. While most of the hate speech cases were ruled on very strictly by the courts, and even by the Media Council; there is an alarming trend of hate speech against ethnic minorities (mostly Roma, and immigrants), "liberals", Jews, LGBTQ people, not just in right- and left-wing subcultural media, but also in the government-aligned mainstream media. Looking at these experiences in Hungary, we can conclude that the current state of the digital environment, despite all of its advantages, can be risky to the democratic public.

5. Conclusions

This year's report differs little from those of previous years. The problems outlined in the report have been well-known for European public and political decision-makers for years, and there were some publications about these issues outside of the MPM, as well. Publicity-distorting practices that are similar to those used by the Hungarian government have also appeared in other MPM countries in the past two years, such as Poland, Slovenia or Macedonia. This means that we are not experiencing an isolated phenomenon. Furthermore, the Hungarian government is able to assert its will even more in the international scene; it uses the same rhetoric against journalists and politicians of other European countries that is already commonly used in Hungary. We find that these practices found positive reception in one part of the European public and political sphere. We also find that the European Union and the European Commission has all the legal instruments to investigate problematic issues, such as state advertising or the case of KESMA on terms of the law of competition. Nevertheless, these instruments were not used so far.

Based on our MPM analysis we add some recommendations to the main areas discussed in the report.

Fundamental protection

While we find that the regulatory framework regarding freedom of expression and freedom of information is generally acceptable, the implementation could be better, and in practice many state bodies simply fail to fulfil their obligations stipulated in the laws. The Hungarian Government should find solutions to enforce the state bodies' and other state-related organizations' compliance with the laws. The Freedom of Information Act should be updated, and the law should stipulate how public information and data can be released, including the specification of file formats and clear definitions of readability and usability.

Market plurality and Political independence

We think that many times political dependence comes together with financial vulnerability. Many commercial advertisers depend on the government's sector-specific regulation as well as the government's stick-and-carrot strategy; thus, marketers often include political considerations in their business decisions. We think that one solution could be a European-scale media funding mechanism which we proposed in the Market plurality section.

We reckon that state advertising should be regulated on the European level. We ask the European Commission to look for solutions and means to regulate the use and abuse of state funds in the national media markets. If the current European regulation on fair competition is not sufficient enough to restrain these market distortion practices, then this practice might have to be addressed in a new regulation. Other solution can be to establish new funds and grants to provide financial aid that covers operational costs for independent news outlets.

Social Inclusiveness

In light of the emerging threats powered by disinformation as well as the unclear impact and limited reach of current efforts, the European Union should support larger-scale media literacy programs.

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Annexe I. Country Team

First name	Last name	Position	Institution	MPM2021 CT Leader
<i>Attila</i>	<i>Bátorfy</i>	<i>MPM Hungary leader</i>	<i>Eötvös Loránd University, Media Department</i>	X
<i>Krisztián</i>	<i>Szabó</i>	<i>student</i>	<i>Eötvös Loránd University Media Department</i>	

Annexe II. Group of Experts

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

First name	Last name	Position	Institution
<i>Bajomi-Lázár</i>	<i>Péter</i>	<i>habil associate professor</i>	<i>Budapest Business School - Department of Communication</i>
<i>Ágnes</i>	<i>Urbán</i>	<i>Associate professor</i>	<i>Corvinus University of Economics - Budapest</i>
<i>Tamás</i>	<i>Tófalvy</i>	<i>assistant professor</i>	<i>Budapest University of Technology and Economics - Department of Communication</i>
<i>Bayer</i>	<i>Judit</i>	<i>assistant professor, Phd</i>	<i>Budapest Business School - Department of Communication</i>

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