

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: Italy

Roberta Carlini, Centre for Media Pluralism and Media Freedom, European University Institute

Elda Brogi, Centre for Media Pluralism and Media Freedom, European University Institute

Research Project Report

Issue 2021.2824

July 2021



TABLE OF CONTENTS

1. About the project	4
1.1. Overview of the Project	4
1.2. Methodological note	4
2. Introduction	6
3. Results from the data collection: assessment of the risks to media pluralism	8
3.1. Fundamental Protection (37% - medium risk)	9
3.2. Market Plurality (66% - medium risk)	11
3.3. Political Independence (49% - medium risk)	14
3.4. Social Inclusiveness (60% - medium risk)	16
4. Pluralism in the online environment: assessment of the risks	20
5. Conclusions	24
6. Notes	26
7. References	30
Annexe I. Country Team	
Annexe II. Group of Experts	

© European University Institute 2021

Content and individual chapters © Roberta Carlini, Elda Brogi, 2021

This work has been published by the European University Institute,
Robert Schuman Centre for Advanced Studies.

This text may be downloaded only for personal research purposes. Additional reproduction for other purposes, whether in hard copies or electronically, requires the consent of the authors. If cited or quoted, reference should be made to the full name of the author(s), editor(s), the title, the year and the publisher.

Requests should be addressed to cmpf@eui.eu

Views expressed in this publication reflect the opinion of individual authors and not those of the European University Institute.

The English version of this report prevails over this translations.

Centre for Media Pluralism and Media Freedom
Robert Schuman Centre for Advanced Studies

Research Project Report
RSC / Centre for Media Pluralism and Media Freedom
2021.2824
Published in July 2021

European University Institute
Badia Fiesolana
I – 50014 San Domenico di Fiesole (FI)
<https://cadmus.eui.eu/>



The Centre for Media Pluralism and Media Freedom is co-financed by the European Union. This publication reflects the views only of the author(s), and the Commission cannot be held responsible for any use which may be made of the information contained therein.

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 Italy the CMPF partnered with Roberta Carlini and Elda Brogi (Centre for Media Pluralism and Media Freedom, European University Institute), 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/>.

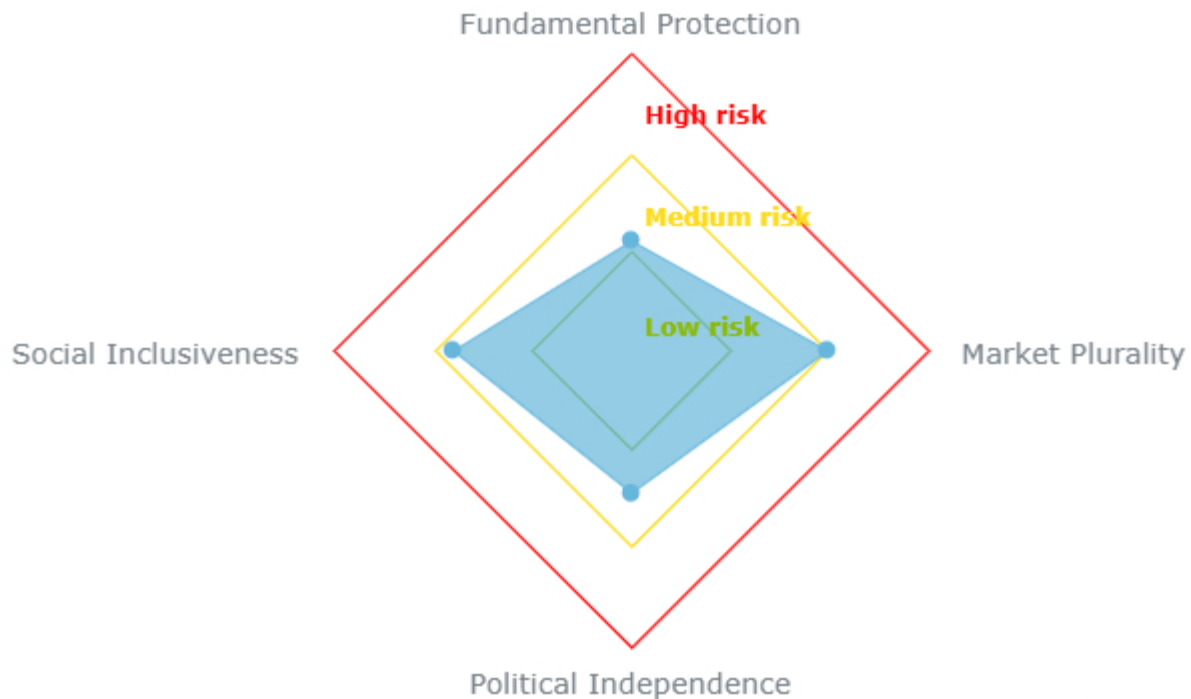
2. Introduction

- Italy covers an area of 301,338 km² from the Alps to the Mediterranean Sea. It has a population of 59,258,000 (ISTAT 2021a). Due to a negative natural balance, Italy's population has steadily decreased since 2015, and in 2020, the COVID-19 pandemic accelerated this negative trend. Deaths increased by 18% (to 746,000), whereas the births declined to a historical low of 404,000. As a consequence, the natural balance in 2020 has been - 342,000. The pandemic impacted the immigration flows into Italy as well, halving of the immigration-emigration balance. As of 2020, 5,036,000 residents are foreigners, 8.4% of the total population. The first five countries of origin of such immigrants are: Romania (22.8%), Albania (8.3%), Morocco (8.2%), People's Republic of China (5.7%), Ukraine (4.5%).
- Italian is the most spoken language and, according to the Italian Constitution, (Art. 6), "The Republic guarantees, through specific laws, linguistic minorities". There are twelve minority languages that are spoken by around 2,500,000 citizens coming from five distinct linguistic roots (Albanian, Germanic, Greek, Romance, Slavic), which are recognised and protected. Languages that are spoken by migrants are not protected.
- In terms of GDP, Italy is the third largest economy in the Euro area. The Italian economy was severely hit by COVID-19's impact. In 2020, Italian GDP fell by 8.9% (making it the second hardest-hit country in EU after Spain) (ISTAT 2021b). As the Head of the Government Mario Draghi posed in the foreword to the Italian National recovery and resilience plan, "the crisis struck an already fragile country from an economic, social and environmental point of view. Between 1999 and 2019, Italian GDP grew by 7.9%. Over the same period, in Germany, France and Spain, the increase was 30.2%, 32.4% and 43.6% respectively. Between 2005 and 2011, the population below the absolute poverty line rose from 3.3% to 7.7% and the rate increased further to 9.4% in 2020". (Draghi 2021). Even before the abrupt downturn in 2020, the economy was characterized by low productivity, low growth and high unemployment, particularly among youths and women, and the decline of public and private investments. Perdurant issues are low productivity, high public debt and structural deficiencies that hinder growth: the public administration and civil justice structural delays; corruption and tax evasion.
- In recent years, the Italian political landscape has been characterised by three main actors: the League Party, the Five Star Movement and the Democratic Party. In the past two years, the alliances between these parties changed several times. Soon after the 2018 political elections, the League Party, the leading party in the centre-right area, broke its alliance with the other centre-right parties, Forza Italia (Silvio Berlusconi's party, in PPE in the European Parliament) and Fratelli d'Italia (the far-right party), to form a government with the Five Star Movement, led by Giuseppe Conte. The relative weights between the two parties changed abruptly after the European election in 2019, in which the League gained the largest consensus becoming the first Italian party (in the European parliament it enlisted in the ID group); their alliance collapsed. A new government was appointed in September 2019, led by the same Giuseppe Conte and supported by the Five Star Movement and the Democratic Party, together with Liberi e Uguali (a small leftist party) and Italia Viva (another small new party founded by former PM Matteo Renzi who left the Democratic Party). In early 2021, the political scenario changed again, when Italia Viva withdrew its support to the government. The President of the Republic called for a large national alliance to face the extraordinary crisis followed to the pandemic, and the former BCE president Mario Draghi was appointed to form the new government, supported by all political parties but Fratelli d'Italia. In the new "grand coalition" Forza Italia is back in the government after seven years. Forza Italia is led by Silvio Berlusconi (who was re-elected to the European Parliament in 2019, after a period in which he was forbidden to run for political office due to convictions for tax fraud), the owner of the Fininvest-Mediaset group, second in the audiovisual audience ranking in the country.

- In an evolving media market, television is still a prominent source of information. The overall use of television is stable between 2015 and 2019, with digital terrestrial and satellite tv losing ground (respectively, from 94 to 87.4% and from 42.4 to 41.1% of the population), in favor of internet and mobile tv (respectively, from 28.3 to 34.5% and from 11.6 to 28.2%). In the same timespan, consumption of print newspapers decreased from 41.9 to 37.3%, traditional radio decreased from 58.3 to 50.9% and news websites rose from 39.2 to 51.6% (CENSIS 2020). When it comes to the news on political matters, according to Eurobarometer, television still ranks first, followed by the written press and "the internet" (social media and websites) (EB92 2020). The access to the news online is mostly side-door (53%), i.e. the majority of people access news online via algorithmic sources (social media, search engines, aggregators) (Newman et al. 2020).
- The growing role of internet impacts in the media market, as measured in the Integrated System of Communication (SIC, the widespread aggregate on which the Italian law sets the thresholds to evaluate concentration). In the most recent evaluation, the audiovisual media still hold the dominant share of the SIC (48.2%, down from 49% in the previous year), followed by the press (19.7%, down from 21.1%). The share of electronic publishing and online advertising continues to grow rapidly (19.5%, up from 17.5%) (AGCOM 2021a). As a consequence, digital platforms entered in the ranking of the main players in the SIC, dominating the online advertising market. A high degree of concentration is also an enduring feature of the traditional media market, in recent years motivated also by the worsening economic conditions. In the audiovisual sector, the long-standing duopoly formed by PSM (RAI) and Fininvest still dominates the free-to-air broadcasting sector, while Comcast-Sky is the main operator in the pay-tv. In the press sector, the first player is the Gedi group, whose acquisition by Exor (the Agnelli family holding) was completed in 2019.
- In the regulatory environment, the main development in the year of the assessment regards the media law in itself (the so called "Gasparri law"), that must be reformed following the ruling of the Court of Justice of the European Union. This ruling stated that the Italian threshold set for cross-media concentration is contrary to EU law, as the restriction on freedom of establishment posed by a member state should be proved to be proportionate to the goal it pursues^[1].
- COVID-19 hit Italy earlier than the rest of Europe. The first closures were imposed on February 2020, and the first general lockdown on March 2020. A year later, the deaths attributed to COVID-19 were 120,000: the highest death toll in the European Union. During the lockdowns, media were considered as essential services and therefore journalistic activity has not been physically restricted. News consumption experimented a "coronabump" in the first wave of the pandemic: the audience share for the 8 pm edition of national broadcasting news grew by 51-53% in March and April 2020, the reach of news websites and apps by 88.9 and 91.1% in the same months (on yearly base)^[2]. Nonetheless, the media industry suffered relevant financial losses due to the decrease in advertising revenue. The rescue packages provided in 2020 by the government include some media-specific measures to help counteract the pandemic crisis.
- In April 2021, worrying news for the protection of journalists' sources emerged: reports outlined that prosecutors in Trapani wiretapped hundreds of phone conversations involving at least 15 journalists who report on migration in the central Mediterranean, including conversations with confidential sources and legal representatives^[3].

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

Italy: Media Pluralism Risk Areas



JS chart by amCharts



The **Fundamental Protection** area scores medium risk, at 37%. As in the past, this is the area in which the country performs relatively well, showing that the basic legal conditions of media freedom and media pluralism are respected. Nonetheless, some critical issues emerge. Even though the indicator for Protection of freedom of expression scores now low risk - reflecting judiciary developments leading towards defamation law reform - the average score of the area did not improve, because of increased risks in the protection of right to information (partially related to the temporary restrictions in the first wave of the pandemic) and of the growing threats to the Journalistic profession, standard and protection (attacks, intimidations, physical and digital menaces). The universal reach for traditional media is guaranteed, while coverage and speed of the internet lag behind.

The **Market Plurality** area is at the upper level of medium risk (66%). In comparison with MPM2020, the situation worsened mainly in the indicator of Media viability, which measures the economic sustainability of the media industry and reflects the drop in advertising revenues. Some emergency public funding to the media were provided but fell short of compensating the market losses. Journalists' economic conditions deteriorated consequently, particularly in the case of freelancers. A high risk historically characterizes the indicators of News media concentration and Online platforms concentration and competition enforcement. The two indicators at medium risk in this area are Transparency of media ownership and Commercial and owner influence over editorial content - the latter showing an increased exposure of journalists to businesses pressure, related to the poorer economic conditions.

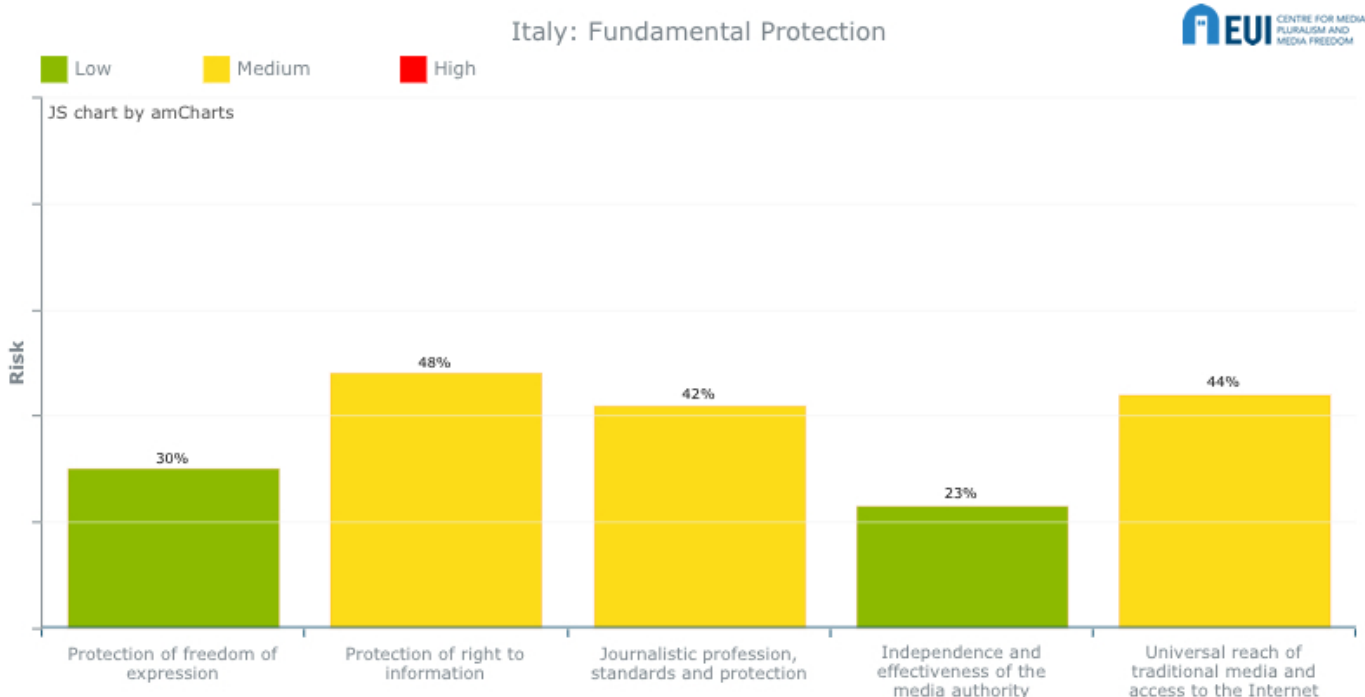
In the area of **Political Independence** (medium risk, 48%) the higher level of risk comes from the indicator of Independence of PSM governance and funding. In the MPM methodology, this assessment results both from the analysis of the legal framework and from the evaluation of its effective implementation. Political independence and editorial autonomy are at medium risk for the commercial media, reflecting on the persisting role of a political actor in the private audiovisual media; the lack of effective rules to prevent conflicts of interest; the shortcomings of the rules on electoral communication, all of which hardly fit in the

changing media environment. The public support to media sector is based on objective criteria but lacks consistency and effectiveness, and is not adequate to face the current crisis.

The increased level of risk ascribed to the **Social Inclusiveness** area (60% - medium) is mainly due to the new indicator on Protection against illegal and harmful speech, which scores a medium risk, very close to the border of high risk. Vulnerability to harmful content is worsened by the poor Media literacy result, which has still to be developed in the educational system. The worst result in this area, as in the previous report, is for Access to media for women, that scores a high risk. Such high risk highlights once more the perduring gender gap at top positions in the media industry, especially among editors-in-chief, as well as the unfrequent and stereotyped representation of women in the media. The medium risk in Access to media for minorities is mostly related to minorities non legally recognised (migrants).

3.1. Fundamental Protection (37% - 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.



Italy scores medium risk in the Fundamental protection area. While the legal framework is generally in line with international standards, risks emerge from its effectiveness, from the delay in the implementation of recent reforms, and from the growing threats to safety of journalists. The state of health emergency - declared on 31 January 2020 - did not have a direct impact on the rule of law in the country, although it is important to note the worsening of journalistic working conditions and a temporary suspension of the Freedom of Information Act.

The indicator on **Protection of freedom of expression** scores low risk (30%). Article 21 of the Italian Constitution protects freedom of expression; restrictive measures (to protect dignity, honour, privacy, national security and public order) are prescribed by the law, in line with the Constitution. Although freedom

of expression is generally respected, some provisions of the Criminal Code do not fully comply with international standards and Article 10 of the European Convention on Human Rights. The long-standing issue of criminalization of defamation^[4] came to a turning point in June 2020, when the Italian Constitutional Court invited the Italian Parliament to remove specific provisions deemed unconstitutional and to promote a wider reform of the defamation framework^[5]. The decrease of the risk level for this indicator reflects this development. A further development occurred in 2021, which is worth to be reported although it is outside the time frame of MPM assessment: since the legislative power took no step in amending the provisions on criminal defamation in the terms prescribed by the 2020 ruling, the Italian Constitutional Court ruled on June 22, 2021 the unconstitutionality of prison sentences in cases of defamation through the press, except for cases of "exceptional severity"^[6].

The government and media authority initiatives to counteract disinformation on COVID-19 were not made to the detriment of freedom of expression^[7] (see also Chapter 4).

Protection of right to information scores a medium risk at 48%. The "Freedom of Information Act" (FOIA) was first adopted in Italy in 2016. Legislative decree 97/2016 regulates "civic access", empowering citizens to access the data and documents of the public administration that are relevant to public and private interests. Any refusal by the public administration to provide such information must be duly motivated and scrutinized. According to independent reports, the justifications provided for refusing access to information are sometimes vague, or not clearly grounded in the exemptions set by the law^[8].

In 2020, during the COVID-19 emergency, the terms for the access to public acts were suspended from 28 February to 15 April 2020. According to Council of Europe, "any restriction on access to official information must be exceptional and proportionate to the aim of protecting public health" (CoE2020a). In the Italian case, the restriction on access in March-April 2020 was exceptional and temporary, but motivated by organisational issues rather than by the public health's protection.

The protection of whistleblowers^[9] is limited to persons who work in Public Administration and in cases of private companies working with PA. The law is not consistent with the EU directive 2019/1937, that requires the protection of whistleblowers working both in the public and private sectors, and whose transposition is scheduled for 2021 in "legge di delegazione europea"^[10]. ANAC (the national anti-corruption authority) collects whistleblowers' complaints and oversees their protection; in 2020, ANAC opened 21 sanctioning proceedings and imposed three sanctions.^[11]

Journalistic profession, standards and protection scores a medium risk (42%). In Italy, at least 20 journalists are under police protection after receiving credible threats to their lives. (CoE 2020b). According to the official data, in 2020 there were 163 cases of menaces and intimidations to journalists (with a sharp increase in comparison with 2019: 87%)^[12]. The threats against journalists from organised crime are under 20% of the total cases reported, while other socio-political contexts appear to be the source of most harassment: increasingly, ordinary citizens are verbally or physically threatening journalists, especially online but also offline, especially during far-right protests or, in times of pandemic, no-vax/negationists' demonstrations. The worsening of the journalists' working conditions, characterized by an increasing divide between employed journalists and freelancers, is a source of concern; while the newsrooms have gone through a generalized reduction of staff, they increasingly rely on the contributions from freelancers, who work in situations of severe professional insecurity and receive low wages^[13]. Freelancers are not only less protected against unemployment and illness, but also more vulnerable to menaces, attacks, strategic lawsuits against public participation (SLAPPs)^[14]. The different position of freelancers and "non-professional" journalists ("professional ones" being considered by the law as the highest professional degree for journalists enrolled to the Order of Journalists) is also consistent in the realm of protection of sources' confidentiality: in fact, strict interpretations of the Code of Criminal Procedure provision on "professional

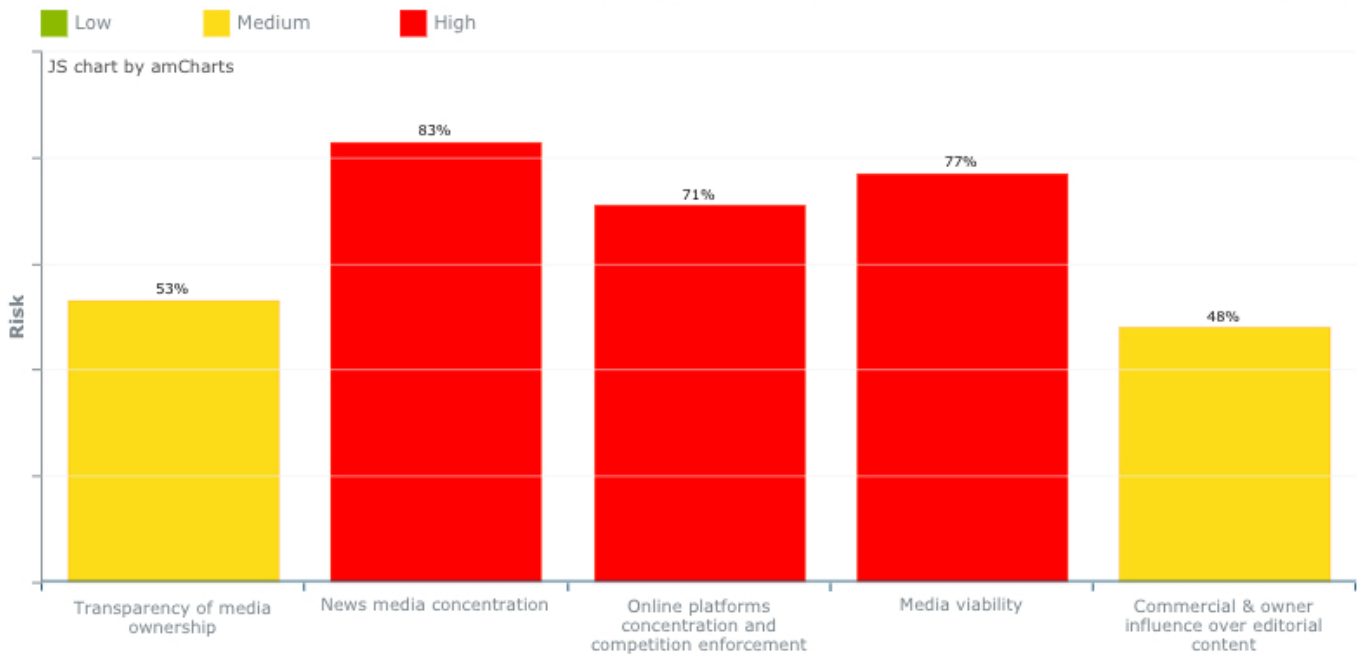
secrecy" (Art. 200) can lead to a disparate treatment among professionals practically doing the same job, as happened in the last years (Verza 2017).

The indicator on **Independence and effectiveness of the media authority** scores a low risk (23%), due to the legal framework on appointment procedures and budgetary independence, which is in line with the procedures adopted in other EU countries and designed to preserve the media authority independence. The President and the Board of the media authority - AGCOM - are appointed by political bodies, through a mechanism that involves both the government and the parliament and is not aligned with the electoral cycle. This mechanism should guarantee the AGCOM independence from the parliamentary majority, but does not oblige the parties to a transparent selection based on the competences and candidates' CVs; and it is not immune from risks of political bargaining. In July 2020, the new board was appointed, after a one-year delay - due to both political impasse and the pandemic emergency. In the selection procedure neither the parliament nor the single parties opened a call to select candidates, as they did in other cases. Concerns have been expressed by some civil society organizations as well as by scholars^[16]. AGCOM has not completed the evaluation of the levels of concentration in the audiovisual media market, which is due since 2015, in the wait for the conclusion of the refarming process. In the annual report (AGCOM 2020, p. 49), the delay is also justified by the instability of the legal framework, caused by the sentence of the Court of Justice of the European Union on the Vivendi/Mediaset case that calls for a reform of the media law (see Chapter 3.2).

Universal reach of traditional media and access to Internet scores medium risk (44%). While universal coverage of Public Service Media (PSM) is guaranteed, the score of this indicator reflects the digital divide in broadband coverage, subscription and connection speed. The share of households with a broadband connection was 83.7%, while the share with ultrafast fixed broadband connection was at 21.7% (both below the EU median^[16] in 2019, last data available at the time of assessment). The shortcomings of connectivity are particularly worrisome in 2020, due to the lockdowns, especially for students and workers in the rural areas and in the South. The market share of the TOP 4 Internet service providers (ISPs) is above 90%.

3.2. Market Plurality (66% - medium 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



Transparency of media ownership (medium risk, at 53%) is enshrined among the fundamental principles of the Constitution^[17]. Since 1997 information on the ownership structure of media companies is collected in the Register of Communication Operators (ROC), whose scope guarantees transparency and disclosure of the ownership of all media providers (AVMS, press, online media) and electronic service providers. The ROC is handled by AGCOM. To enlist in the ROC, operators must give and update information on their shareholders, their quotas and voting rights, and communicate details about ultimate and beneficial owners. Not all the information is directly and easily accessible to the general public, particularly when it comes to disclosure of ultimate ownership: only the legal name and contact details are provided on the AGCOM website^[18]. Limits in effectiveness, rather than in the legal framework, lead to a medium risk for this indicator. (see also Chapter 4 for online platforms in the ROC).

The indicator on **News media concentration** scores a high risk (83%). All the news media sectors are highly concentrated. In the past, this process was driven by the public-private "duopoly" in free-to-air broadcasting; challenged but not substantially affected in more recent times by competition from pay-tv and internet tv; in the press sector, the traditional trend toward concentration is accelerated by the economic decline of newspapers; whereas the online environment in news media offer is dominated by the digital offer of legacy media - the digital native sector being more pluralistic but less relevant in size. In the audiovisual market, Comcast/Sky is the first operator (35,6% of revenues), followed by RAI (29%), and Fininvest/Mediaset (19.9%): in comparison with the previous year, Comcast/Sky's share grew and Fininvest/Mediaset's share declined, following the agreement between the two groups practically ending competition in the pay-TV market in Italy (CMDS 2020)^[19]. In terms of audience, RAI ranks first (35.7%), followed by Fininvest/Mediaset (31.6%), Discovery (7.4%) and Comcast/Sky (7.2%). Starting in 2018, the radio sector passed through a process of concentration, and is now dominated by four players (RAI and Fininvest/Mediaset again, followed by GEDI and RTL). GEDI is also the first player in the newspaper sector, with 25.4% of revenues, followed by Cairo/RCS (21.5%), the other main groups (Monrif and Caltagirone) being at 7-8%. GEDI owns La Repubblica and La Stampa (second and third largest national newspapers), 10 regional and local titles, the weekly magazine L'Espresso, and some prominent radio stations. It is controlled by Exor, the Agnelli family's holding, whose most important assets include automotive and other mechanical industries, insurance, real estate, and the football team Juventus. In 2020 the group appointed new editors-in-chief for its newspapers. In parallel, a new newspaper was founded, *Domani*, financed by the former owner of *La Repubblica*.^[20] The Cairo/RCS group is a pure

publisher and advertising intermediary; it controls Corriere della Sera (the largest Italian newspaper), La Gazzetta dello sport, a large number of popular magazines; and it is the fourth player in the audiovisual market with La7 Tv.

The high degree of media ownerships' concentration in Italy should be evaluated as the result of an historical trend; and, in more recent years, as a defensive strategy to face the worsening economic conditions (see the indicator on Media viability). Together with the high concentration, some structural features have to be underlined: 1) the high market concentration is intertwined with risks of political influence, as the two main players in the market are a not-fully independent PSM (see the indicator in Political Independence area) and Fininvest/Mediaset, owned by Silvio Berlusconi, who is one of the main political actors; 2) in most cases the media owners have other relevant industrial and financial interests; 3) some companies have relevant market shares across different media sectors (for concentration in the online environment, see Chapter 4).

The high degree of horizontal and cross-media concentration has not been addressed by the relevant authorities because of the very broadness of the SIC, which poses high threshold to assess dominance (Cappello 2020). The law sets limits to market share for each media market (technical limit) and for the overall media market (economic limit)^[21]. No infringements of the technical limit have been established by AGCOM; in the case of the audiovisual sector, the definition of the relevant market has been postponed several times, in the wait for the reallocation of the 700 Mhz frequency band. In 2020 the process of definition of the audiovisual market was suspended; the suspension was justified by technical reasons and by the evolution of the legislative framework, after the sentence by the Court of Justice of Europe in the case Vivendi vs Mediaset, which ruled that the threshold set by the Italian law for cross-media concentration is contrary to EU law, as the restriction on freedom of establishment posed by a member state should be proportionate to the goal it pursues. While the sentence closed a long-lasting dispute between Mediaset and Vivendi, and pushed the two companies to resume negotiations on their business strategies, it impacted the regulatory framework calling for a reform of the cross-media concentration rules in Italy. In the wait for such a reform, the Italian government approved a norm in an emergency decree to counteract the effects of the sentence^[22].

Chapter 4 analyses the specific risks to market plurality related to **Online platforms and competition enforcement** (71%). It is important to anticipate that, while not contributing to foster competition in the news media market, the digital platforms challenged the sustainability of the media industry, harvesting their market resources both on the side of sales - for the large availability of online free information - and advertising revenues.

The **Media viability** indicator scores a high risk of 77%. In a generalized economic downturn, the market revenues declined more than the GDP for all media but pay-tv. According to the latest data available at the time of the MPM assessment, free-on-air tv lost 11.1%, the radio sector declined by 23%, newspapers by 14.6%, magazines by 19.8%. Only online advertising, which is overwhelmingly gathered by the digital platforms, reported a positive variation (6.7%). (AGCOM 2021b). Fostered by the crisis and by the abrupt change of consumption habits with the lockdown, a number of leading media outlets pushed towards digital offers, launching their paywalls and digital subscription programs during the pandemic. Although these efforts did not make up for the advertising losses in the mainstream media, some lively digital native and niche media, particularly the ones that did not rely exclusively on advertising, performed better and managed to monetize the growing attention towards news^[23].

When analysing this indicator, MPM also assesses the employment and salary trends for journalists. According to INPGI (2020), from 2012 to 2019 regular employment decreased by 14%, while non-standard journalistic employment increased by 20.8%. The COVID-19 crisis impacted these two groups of journalists differently, exasperating the dualism of the journalistic labor market. Whereas the impact of the crisis on regular employment has been curbed by the job retention schemes, the freelancers suffered most. Cuts in

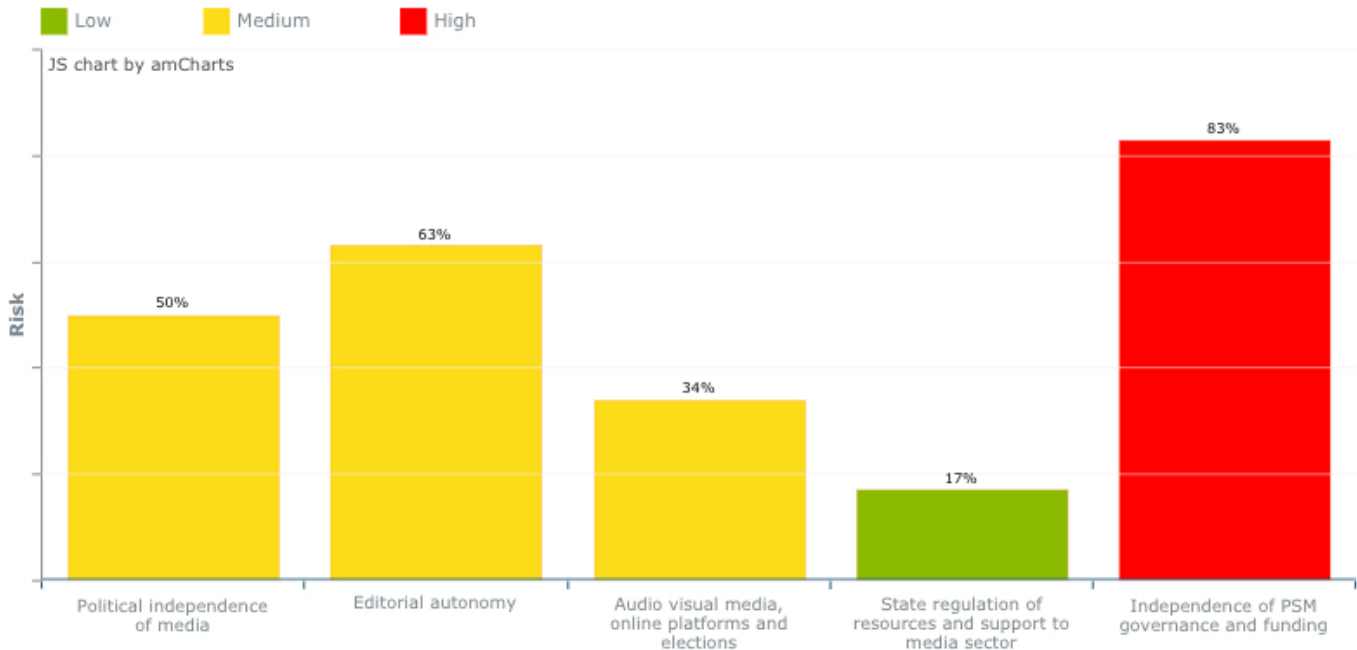
production (local and special outlets, number of pages, collateral products) and newsrooms budgets forced employers to close temporary and precarious contracts, and the remuneration for freelancers contribution lowered consistently.

Direct public subsidies to the media industry, provided through the "Fondo per il pluralismo e l'innovazione dell'informazione"^[24], declined from EUR 176 million in 2007 to EUR 66,5 million in 2018, but rose again to EUR 116.4 million in 2019. The direct contribution is designed to support specific sectors (such as cooperative and linguistic minority media). So far, the reformed Fund has not pursued its primary goal, which was to foster innovation. Extraordinary measures aimed at helping the media sector were adopted during the pandemic^[25]; they included a tax credit for advertising investments and other tax exemptions for press and (to a minor extent) digital outlets. The emergency measures have been implemented, but one cannot say that they have been effective, if not to a minimum extent, in counteracting the economic emergency in the media sector. The government announced that it will use part of the resources coming from the European RRF to help digital transition in the media sector.

The economic risks reflect the growing score of the last indicator of this area, **Commercial and owner influence over editorial content** (medium risk - 48%). Employed journalists can rely on some safeguards, granting them social protection in case of change of ownership or editorial line. The ban on advertorials is not fully effective, and in case of native advertising and sponsored content, there is not always full disclosure that clarifies to the public that they are reading/viewing content paid by advertisers. The structural features of the media ownership increase the risk of overlap between editorial business and other businesses^[26]. Reduction in media viability and growing dependence on advertising create a more risky environment for economic information. The rules issued to clearly separate editorial content from commercial content are often bypassed, in legacy and (more) in digital media. Legacy outlets more and more use special folders ("speciali", "guide") to publish sponsored content, in which the disclaimer is not visible or not present at all. The new advertising techniques in digital media - native advertising, advertorials, sponsored links - often mislead users in recognizing ad-paid content.

3.3. Political Independence (49% - medium risk)

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



The indicator on **Political independence of media** (medium risk - 50%) reflects the lack of an effective law on conflict of interest. The situation has not changed since the previous MPM assessments. The existing Law 215/2004, called "Frattini Law"^[27], has been criticized by the European Commission for democracy through law (Venice Commission 2005), stating that "the solution provided by the Frattini Law to the issue of conflicts of interest consists of a mix of *a priori* incompatibilities (primarily of an administrative nature) and the *a posteriori* examination of individual acts of government. It does not contain sufficient 'preventive' measures for resolving a potential conflict of interest". At the time, the Venice Commission concluded that "the Frattini Law is unlikely to have any meaningful impact on the present situation in Italy", and encouraged the Italian authorities to find an appropriate solution. In spite of being a core issue in the Italian political debate for years, the draft reforms are still pending in parliament. Although the most blatant and well-known case regards the owner of the first audiovisual private group - the former prime minister Silvio Berlusconi -, the lack of effective rules on conflict of interests affects more generally the independence of media, at national as well as at local level. The risk of political influence in the audiovisual media outlets is also high for the PSM role (see the specific indicator, below).

The leading newspapers are not directly or indirectly owned by politicians or political parties^[28]. Still, the editorial lines reflect the strong polarization of the Italian political scenario, often leading to a more prominent role for newspapers and journalists - mostly in talk shows - in the political debate, but not to an increase in their watchdog functions and investigations.

Similar concerns bring to a medium risk score for **Editorial autonomy** (63%), which is measured on the basis of the existence and effectiveness of the rules to safeguard the independence of journalists, e.g. about the appointments and dismissals of editors-in-chief. In the lack of legal safeguard, in Italy, this issue has traditionally been addressed by self-regulation and reputation effects. These tools risk becoming less effective in the evolving media environment, both for the deteriorating of economic and working conditions (which expose the journalists to external pressure) and for the different features of the digital ecosystem. The editorial autonomy of the private media is also menaced by structural features of the media ownership, as many of the main players have multiple businesses, whose success may be influenced by governments' decisions.

The indicator on **Audiovisual media, online platforms and elections** scores a medium risk (34%), the main issues being PSM bias and the lack of rules on political advertising online. The "par condicio" law

(28/2000) provides rules on the fair distribution of airtime to political parties and candidates during electoral campaigns. The media authority has to supervise compliance with this law. In the past, data from the media authority and independent observatories showed that political pluralism and fair representation was not always respected (see Brogi and Carlini, 2020). In 2020, Italy held some local elections and a constitutional referendum. The media authority adopted 31 resolutions about information on national channels to reestablish the parity of treatment and the balance between political parties and between the referendum positions. With the political communication increasingly shifting online, and the political actors directly contacting their followers on social media, the existing legal framework reveals more and more its limits (see Chapter 4).

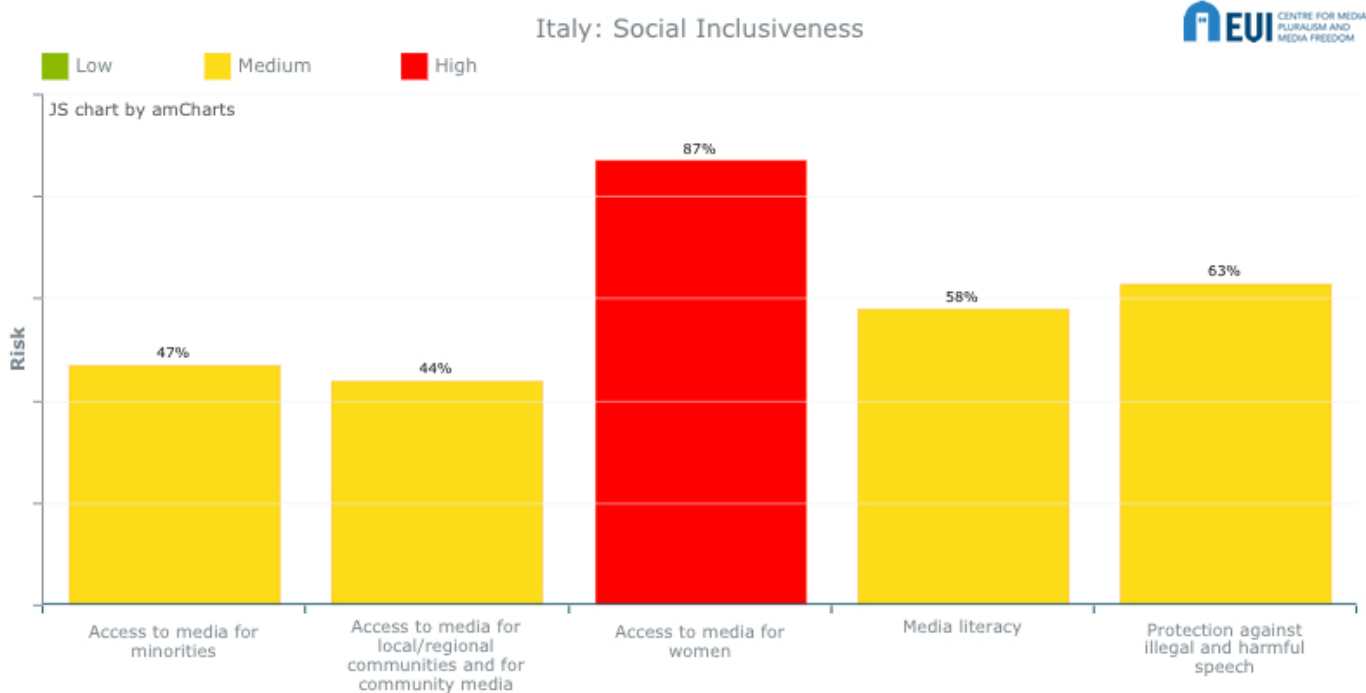
The lowest risk in this area comes from the indicator on **State regulation of resources and support for the media sector**. The positive assessment is mainly due to the completion of the spectrum reallocation (the process that redistributed the 700MHz frequency band). As a result the linear AVMS offer is now open to a higher number of operators. The low risk is also related to the rules on state advertising, whose destination must be communicated yearly to AGCOM by governments departments and public authorities; nevertheless, it is worth noting that the same provision does not apply to publicly-owned companies. A medium risk is scored in the sub-indicator on the distribution of government subsidies to media. Since 2016, the system of public funding to media has been reformed with the establishment of an unique fund (Fondo per il pluralismo e l'innovazione dell'informazione). The law provides objective criteria: only newspapers edited by a cooperative of journalists, nonprofits, or expression of linguistic minorities, should be entitled to the public support. But the distribution of funds is contested, as some media companies benefit from them just thanks to legal expedients and loopholes; its main goal, to foster technological innovation, has not been achieved yet. This confirms the assessment of the Constitutional Court that, after judging the system of public funding in 2019, stated that the system is not contrary to the Constitutional principles, but it is "internally inconsistent"; the Constitutional Court affirmed: "it is clear that in a sector such as the one in question, characterized by the presence of a fundamental right, there is a need for the regulatory framework to be brought back to transparency and clarity, and in particular for the allocation of resources to meet certain criteria and aims"^[29]. From a quantitative perspective, direct state contributions to media declined from EUR 176 million in 2007 to EUR 66,5 million in 2018, to rise again to EUR 116.4 mln in 2019. The 2020 direct funds have not been distributed yet^[30]. In 2020, following the COVID-19 crisis, extraordinary funds were provided in the form of indirect subsidies (see the indicator on Media viability).

The Independence of PSM governance and public funding is at high risk (83%). In 2015, Law 220 reformed the governance of PSM (RAI)^[31]. The board is composed of 7 members: 2 elected by Camera dei deputati (the Lower Chamber), 2 by the Senate, 2 appointed by the government, 1 elected by the employees. Although the law requires a public call and specific competencies of the candidates, in its first implementation in 2018, there was no public contest, neither the selection criteria were publicized. It is widely recognized, even by the political parties, that the PSM reform did not solve the historical problem of high dependence of the composition of the board, and consequently of the top executives and editors-in-chief, from the political equilibrium, often following a detailed pattern in the negotiation ("lottizzazione") (Zaccaria 2021; Verdelli 2019). Some concerns arose on RAI's budgetary independence as well, after the reform of the licence fee collection which, in spite of the improved effectiveness, exposed the PSM to less stable financial flows and dependency on the government's decisions^[32].

3.4. Social Inclusiveness (60% - 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.



The indicator regarding **Access to media for minorities** (47%) scores a medium risk. While the access to media for minorities is good for legally-recognized minorities, the access to commercial outlets is reduced, justifying the existence of a medium risk. On the one hand, access to airtime on PSM is guaranteed to legally recognized minorities by a set of legal dispositions and is well respected. Ivana Nasti, Executive director and coordinator of the Regional committees (CORECOM) at the media authority (AGCOM) stated that "RAI's commitment to guarantee specific content for linguistic minorities (around 14,000 hours), which is due also to the Corecom's requests, gives appreciable outcomes and is approved by citizens; nonetheless, there is an important margin of improvement". On the other hand, private TV and radio are not legally obliged to give access to legally recognized minorities contrary to PSM. Therefore, even despite the existence in some cases of public funding and incentives set by regions with supported programs, private TV and radio are not performing as well as PSM in regards to providing access to media for minorities. It is also important to notice that non legally-recognized minorities are poorly represented both on PSM and on private broadcasting. Carta di Roma (2020) reports that the migrants' access to PSM performs better than the overall audiovisual information, but it is far below their real weight and presence in society. The total minority presence in TV news in total is 0.4%, with their presence in PSM news in prime time slightly higher, at 1%). According to Paola Barretta, researcher at Carta di Roma, their data shows that "migrants, refugees and second generations are mostly interviewed or hosted for migration's issues, very rarely on overall information. The percentage in voice for migrants, refugees and asylum seekers is 8% in PSM news if we consider only the coverage on migration, mostly related to emergency framework. The research shows that minorities' access to PSM is still lower if we consider all the programming, news and entertainment (infotainment): the long-standing goal to get migration out of the emergency framework is not realized yet"^[33]

The indicator Access to media for minorities also includes Access to media for people with disabilities for this 2021 edition of the MPM. Rai's Contratto di servizio (art. 10 and 25 h) sets specific targets for coverage of subtitles and audio description. However, these are not always achieved. It is nonetheless important to

highlight that PSM has improved its standards in 2020, as the news coverage on COVID-19 were subtitled.

The indicator regarding **Access to media for local/regional communities and for community media** scores a medium risk (44%). The existence of a risk for regional and local media originates from the absence of sufficient and adequate fundings (AGCOM, 2019). Otherwise, from a legal point of view, the risk is reduced for regional and local media as their access to media platforms is legally guaranteed. PSM are also legally obliged to keep local correspondents. Regarding community media, these are still a marginal phenomenon in Italy. Although limited in number, community media include a lively bunch of independent community journalism initiatives, mostly digital and often local. The Law 177/2005 recognizes their existence in audiovisual and radio sector. However, the law does not contain any specific provision to enable and safeguard the community media, they have effective political independence.

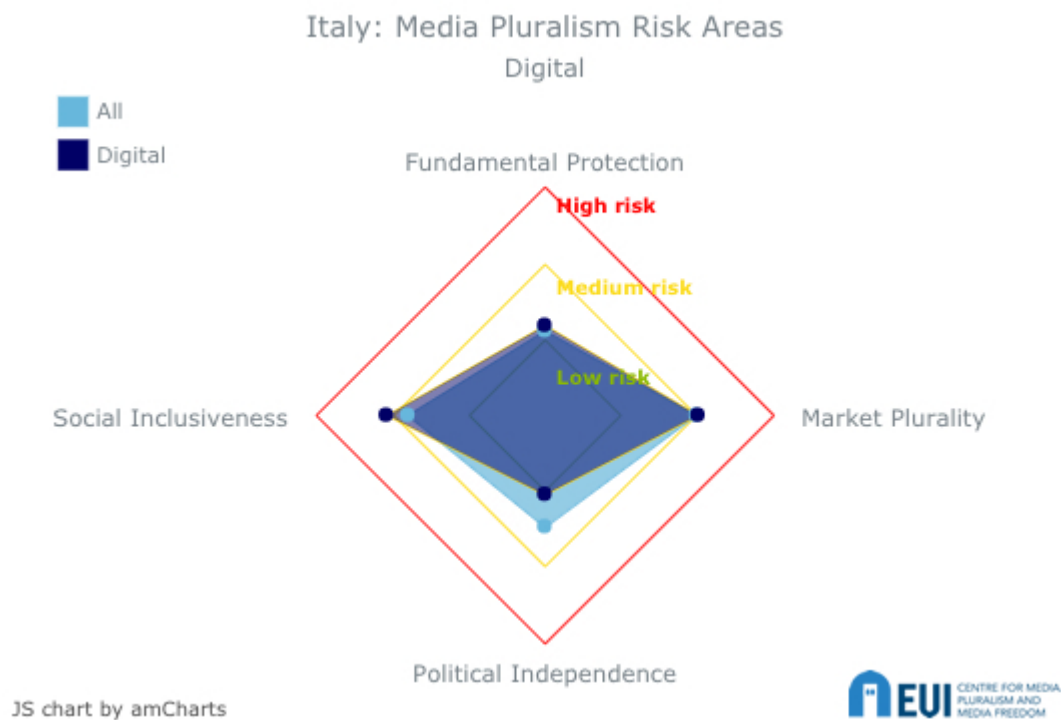
The indicator concerning **Access to media for women** scores a high risk (87%). Despite the mention of gender equality and gender balance as fundamental principles of PSM in the Contratto di Servizio Rai, women only occupy 25.5% of key management positions, and their salary is systematically lower than that of men^[34]. Private media outlets are not performing better on that matter. It is important to notice that in 2021, none of the leading news media companies in Italy had a female editor-in-chief. Despite the fact that gender gap in tertiary education in Italy shows an advantage for women (5.2 percentage points on overall population and 14.3 pp in age 30-34), and women's presence in universities and academic research has grown, women continue to be rarely invited and interviewed as experts in talk shows, reporting, and in general in media coverage. Furthermore, the under-representation or stereotyped representation of women in the news is almost systematic in Italy (Maglia 2020), despite the fact that recent measures have been taken to tackle this issue. Among these measures, the new Contract of service with PSM provides that: "Rai shall ensure that news and current affairs programs comply with general principles, among which the respect for gender diversity and sexual orientation" (article 2, par. 3, letter g).

The indicator on **Media Literacy** scores a medium risk (58%). The medium risk is justified by the fact that the existing policies and initiatives are limited in scope and resources. In 2020, the guidelines to implement a digital civic education ("Curriculum di Educazione Civica Digitale") were provided. Although it is too early to measure the impact of these guidelines on media literacy, Professor Maria Ranieri, from the University of Florence, pinpointed several issues: "in the Italian context, awareness has grown on the need of media literacy policies, and initiatives have been taken; but they lack a sufficient extent and effectiveness"^[35]. First, the guidelines do not extend media literacy education to all school grades. Second, teachers' training remain somehow poor and insufficient.

The indicator concerning the **Protection against illegal and harmful speech** scores a medium risk (63%). This medium risk is justified by both the existence of risks regarding disinformation and hate speech. Despite the growing debate on disinformation, no widespread and effective initiatives have been implemented. Political and legislative initiatives have been proposed; raising some concerns for the potential harm to freedom of expression; they are often limited to the online environment, while the problem of disinformation in the country affects legacy media as well. However, these political initiatives did not result in new laws or specific regulation. The committee established by the government to counteract online disinformation during the Covid 19 had consulting and studying tasks. The most important activity, on the institutional side, is the one carried on by AGCOM, monitoring and calling the platform to self-regulation framework. The absence of reporting on the implementation of voluntary code of conduct by the platforms does not allow to assess its effectiveness. On the other side, several programs by independent professional and civil society organizations started to counteract the phenomenon, with fact-checking/debunking

activities and media literacy initiatives (see Chapter 4).

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



The risk scores in the online environment in Italy are equiparable to the overall scores for all areas except Social inclusiveness, where the digital threats result in a higher level of risk. Some specific indicators raise an alarm on digital risks, namely: Universal reach of traditional media and access to internet; Transparency of media ownership; Online platforms concentration and competition enforcement; Audiovisual media, online platforms and elections; Media literacy; Protection against harmful and illegal speech. The risks are related to the digital platforms dominance, whereas the digital native news media present relatively lower risks when it comes to market plurality and political independence, and some signals of resilience in the indicator of Media viability.

Fundamental Protection

In Italy, the internet is free (Freedom House 2021). Limits to freedom of expression online are the same provided for the offline media. The state and the ISPs do not filter/remove content in an arbitrary way. Other than for violations that are punishable by the criminal law, websites can be blocked or fined for violating copyright. A specific content or website can be blocked or removed in cases when an order is given from AGCOM (following for instance AGCOM's regulation on copyright) or by a judge. In spring 2020, nearly 50 Telegram channels and websites found to be illegally distributing newspaper content were ordered to be blocked, following two investigations in the cities of Bari and Rome. As a part of the same investigation, the Project Gutenberg domain was blocked as well and it is no longer accessible from Italy^[36]. Data and procedures on the removal of copyrighted content are publicly available on the AGCOM website.

When it comes to the digital platforms, it must be underlined that they operate outside the territorial jurisdiction of Italy. Their policies on filtering, blocking and removals are autonomously issued and decided, out of self-regulation. Although the growing concern on disinformation and hate speech lead to some political initiatives that could harm freedom of expression (in 2018, a "red botton" against fake news meant to give disproportionate powers to the postal police; in 2019, a proposal to abolish anonymity on social network), these policies were not, or are no longer, effective. Since 2017, AGCOM has a Technical Table to guarantee pluralism and correctness of information online, whose main aims are collecting data and information, monitoring pluralism and promoting self-regulation by the digital platforms. In the emergence of COVID-19,^[37] the Technical table undertook specific initiatives to counteract disinformation of health

issues: e.g., promoting the quick removal of illegal content harmful to the public health, tools to counteract fake news based on cooperation with fact-checkers. As digital platforms do not report transparently and exhaustively on the details and the criteria of their autonomous decisions in filtering and removals, there is not enough evidence to assess whether or not freedom of expression is respected. However, due to the lack of data and transparency, it is assessed as a risk in the MPM methodology. As the former president of AGCOM posed it, "from the Authority's experience some limits to the pure self-regulation mechanism not accompanied by audit and inspection powers on the role of algorithmic profiling in the selection of contents do emerge. A third and independent verification of the results and measurable impact of self-regulation initiatives is therefore desirable"^[38].

Digital-specific risks in the Fundamental Protection area are also related to the growth of online threats to safety of journalists. Moreover, the indicator on universal reach of traditional media and access to internet reports a higher risk in its digital score, as the coverage and speed of broadband connectivity is under the EU median.

Market Plurality

Transparency of media ownership in the online environment scores a higher risk when compared to the overall score for this indicator. The assessment reflects the fact that not all the digital news media are obliged to register in the ROC (the smaller ones being exempted); for the digital media that must register, transparency has the same limits on effectiveness described in chapter 3.2. A specific source of concern regards the role of cross-border websites, whose role in spreading disinformation, often with the use of bots, is highlighted in some reports and news sources^[39]. In 2020 AGCOM completed its investigation on some digital platforms, sanctioning them for violating the registration obligation and affirming the principle by which the new players in the media market (even if based abroad) must register in ROC if they operate in Italy. The budget law for 2021 contains a specific provision that obliges the online intermediaries and search engines to enlist in the ROC^[40].

Two different trends are traceable when it comes to market concentration of the digital news media. On the one hand, the market is dominated by the digital outlets of the traditional media that are highly concentrated. On the other, the digital-native news media market is smaller, but more open and competitive. In both cases, the lack of standardized and comparable data and metrics on the audience of the digital media makes the assessment difficult.

The digital-specific indicator on Online platforms concentration and competition enforcement is at high risk. In Italy, the majority of people that consume news online enter by side-door access (via social networks, search engines, automated aggregators) (Newman et al. 2020; AGCOM 2018). The online advertising market is dominated by the main 3 platforms, Google, Facebook and Amazon ranking first with 66% of the revenues. On an overall online advertising revenue of EUR 3,332 million, platforms gather EUR 2,403 million, the publishers EUR 928 million. In the latest assessment of the SIC, the media authority certified the growing share of online advertising (from 17.5% in 2018 to 19.5% in 2019) (AGCOM 2021a). The average revenue per user (ARPU) is EUR 23 for platforms, EUR 4 for publishers (AGCOM 2020). As regards competition enforcement: three competent authorities (AGCM, AGCOM and DPA)^[41] joined together in an Inquiry on Big Data to face the new challenges arising from digitalisation. In October 2020, AGCM opened an investigation into Google over alleged abuse of its dominant role in the country's online ad market^[42]. The investigation follows a complaint filed by the Italian digital advertising lobby group IAB (Interactive Advertising Bureau Italy). AGCM questions the discriminatory use of the huge amount of data collected through its various applications, preventing rivals from competing effectively as well as adversely affecting consumers. The media authority is running the procedure to define the relevant market in online advertising. Regarding the policies and regulations to address the market dominance of online platforms and re-balance the weights in the media market, it must be underlined that Italy has not yet implemented the EC Copyright

Directive; whereas the Digital service tax, introduced by the budget law 2019, is still not effective.

In Media viability, the digital score is slightly below the average score, as online revenues were less impacted by the crisis. Nonetheless, it must be noticed that it is hard to measure digital revenues (subscriptions, paywalls, alternative revenues) because of the lack of data.

The digital risk in the indicator on Commercial and owner influence over editorial content is slightly higher, due to less or poor self-regulation on new forms of advertising, commercial communication and marketing strategies (such as native advertising, advertorials, sponsored links/contents) which can mislead users in distinguishing ad-paid content from editorial content.

Political Independence

The digital risks in this area are not related to the news media, but to the role of online platforms. The digital news media (in particular, the native digital ones) are overall less vulnerable to the threats that raise the overall risk in this area (mainly related to conflict of interest and PSM). When it comes to the indicator on Audiovisual media, online platforms and elections, the digital risk score is higher (83%). The general rules for electoral campaigns (the "par condicio" law) do not apply to online platforms, neither does the regulation on transparency of political spending oblige the parties and other political actors to detail their expenditures for political advertising online. In this regard, the situation did not evolve in comparison with the previous year's assessment (Brogi and Carlini 2020). Since 2018, AGCOM highlighted the limits of the rules in the social media environment and issued Guidelines on equal access to online platforms for the national political elections. The online platforms signed up commitments to guarantee equal access to political actors, fact-checking, and respect for electoral silence during the European elections in 2019. However, there has been no monitoring on the effectiveness of the guidelines. There is evidence that the rule about "electoral silence" (on the day before the poll) was violated and in the general weakness of this form of self-regulation ^[43].

Political parties are not obliged to publish the share and the techniques of spending for social media, neither do they so voluntarily or as part of self-regulation. However, it is possible to partially research and estimate political expenses on Facebook or Twitter from the social media ad-library.

There is also evidence that some parties used techniques to spread their messages on the social networks that use automatized activity (like bots) to maximize the effect of algorithms. Freedom of the Net (2020), section B5, reports: "In recent years political parties have also engaged in online manipulation surrounding elections."

Social Inclusiveness

Although the overall score in this area is at medium risk, it marks high risk when it comes to digital competences. The percentage of population that has at least basic, or above basic, digital skills is 42% (below the median of the EU member states), whereas the share of population that has low digital skills is 32% (above the EU median). This issue, and the consequent digital divide among the Italian population, has impacted the resilience to the shifting to online learning in schools and universities during the lockdowns in 2020, with the less skilled students and teachers left behind. The poor digital competences also impact the vulnerability to disinformation and hate speech.

The Media Authority Observatory on Online Disinformation estimated the weight of online disinformation on COVID-19 (data on disinformation collected by several external professionals specialized in debunking): the percentage of online disinformation compared with the total online information of the topic ranged from 6.8% (February 2020, in the first week of the emergence) to 6% (May 2020, easing of the lockdown). According to the Observatory on Journalistic Profession carried on by the media authority, 73% of journalists reported cases of misinformation during the COVID-19 emergency (AGCOM 2021c). Freedom House (2021) reports that "The manipulation of online information was prominent during the COVID-19 pandemic in the first half

of 2020, with widely circulated content promoting various conspiracy theories".

Qualitative assessment may better assess the impact of disinformation, especially since the measure of the phenomenon is highly uncertain. Several investigations (as well as experts interviewed by MPM) underline that disinformation is not peculiar of the online environment but is characterized by a vicious circle in which offline and online disinformation reciprocally feed and spread.

Hate crimes recorded by police doubled between 2015 and 2019 (last data available)^[44]. In 2019, there have been 1,119 reported hate crimes, 805 of which for racism and xenophobia; 107 for bias against other groups - sexual orientation or gender identity; 207 - bias against other groups - people with disabilities. According to Vox-Observatory on fundamental rights, in 2020, hate speech online changed its features: less attacks in quantity, but a more "professional" use of social media by haters, often organized in groups and acting coordinately. Almost half of all attacks were against women.

5. Conclusions

Media pluralism in Italy is at medium risk in all areas of the MPM assessment. The extraordinary circumstances of 2020 impacted several indicators, the most relevant risks being those related to the economic sustainability of the news media, to the freelancers working conditions and to the gap in digital media literacy. Acting as an accelerator of pre-existing trends, the COVID-19 crisis caused a shift towards the highest threshold of the medium risk in the Market Plurality area; while other historical features of the Italian media environment are confirmed: high concentration of commercial media ownership; conflict of interests; lack of independence of PSM; the gender gap in the media. On a positive note, a decisive step towards the abolition of prison sentence for defamation must be registered.

In the **Fundamental Protection area**, the legal framework is generally in line with the international standards. Some risks emerge from its effectiveness, from the delay in the implementation of recent reforms on right to information, and from the growing threats to safety of journalists. The state of health emergency - declared on 31 January 2020 - did not alter the rule of law, although a temporary suspension of the FOIA implementation has to be registered. The economic vulnerability increased exposure of journalists to attacks and SLAPPs, particularly for freelancers that are hardly protected by the companies they work for. Although the legislative power took no step in amending the provisions on criminal defamation as requested by the Constitutional Court in 2020, the ruling of the Court of June 22, 2021 has itself acted in the direction of the abolition of prison sentences for journalists.

Although the legislative power took no step in amending the provisions on criminal defamation as requested by the Constitutional Court in 2020, it is predictable that the upcoming ruling of the Court will itself act in the direction of the abolition of prison sentence for journalists.

Recommendations:

- **to the State, to guarantee an enabling environment for journalism, strengthening state protection for journalists under menace; to introduce anti-SLAPP laws to prevent the chilling-effects of criminal and civil lawsuits on journalists; to improve access to internet, both in terms of broadband coverage and take-up.**

The **Market plurality area** risk score (at the highest threshold of medium risk) shows that external pluralism is menaced by high concentration and declining resources to finance quality and investigative journalism. In recent times, the platforms' dominance in the digital advertising market summed up to the historical high ownership's concentration in the legacy media; the digital competition - despite the abundance and accessibility of information online - nourished a new push towards concentration with defensive mergers between the legacy media. The impact of the health and economic crisis on media viability in 2020 has been strong, with the market revenues of almost all news media sectors decreasing more than the GDP. The extraordinary public intervention had a limited impact on mitigating the crisis; the dualism of the journalistic labor market - with the self-employed and free-lancers much less protected by the overall social security schemes - grew wider.

Recommendations:

- **to the State, to reform the criteria of the media law to evaluate the economic and technical limits in media concentration, taking into account the new challenges of the digital markets; to revise the system of public support to media, to guarantee more transparency, effectiveness and foster innovation; to use part of the resources provided in the digital strategy in PNRR to support media pluralism.**
- **to the communication and competition authorities, to keep cooperating and to co-ordinate their**

studies, initiatives and decisions on data and online media markets.

The **Political independence area** scores a medium risk. The highest risk in the area is related to the indicator on independence of PSM, but relevant threats also menace the editorial autonomy of private media. As for the PSM, the reform of RAI's governance has shown all its limits; and violations of the internal pluralism in the public service have been detected and sanctioned by the media authority. The political instability continues to reflect almost automatically in conflicts about the RAI's governance and editorial line, whereas its diminished budgetary independence contributes to the risk of political influence. As for the private media, the risks of political influence - due to intertwined political and commercial interests of some main players - are higher in the audiovisual sector but regarding the press sector as well. The digital news media are relatively less influenced by political pressure; nevertheless, the regulatory framework, built on traditional media, falls short in applying to the online platforms, especially when it comes to the rules on electoral campaigns and political advertising.

Recommendations:

- **to the State, to reform the law on RAI's governance to strengthen the PSM's independence and to enforce its commitments to guarantee pluralistic information and quality journalism; to reform the law on conflict of interest; to pass a law requiring the political parties and candidates to disclose expenditures and techniques for online advertising and campaigns**
- **to AGCOM and DPA, to cooperate to prevent the abuse of microtargeting practices during electoral campaigns**
- **to the social media platforms, to fully disclose the criteria adopted by means of self-regulation in the political communication**

The **Social Inclusiveness area** scores a medium risk. The change of the structure and variables in this area, in comparison with MPM2020, leads to an increase of the risk level, mainly due to the high vulnerability to the illegal and harmful speech. Nonetheless, the worst result in Social inclusiveness is still due to a worrisome high risk (87%) in the access to media for women. At the time of MPM assessment, none of the leading news media companies in Italy had a female editor-in-chief. Women continue to be rarely invited and interviewed as experts in talk shows and in general in media coverage; and the under-representation or stereotyped representation of woman is a perduring feature of the media landscape. In the Social inclusiveness area, an important step forward is also requested with regards to media literacy and digital skills; and to reduce vulnerability to disinformation and hate speech. Moreover, in a political scenario characterized by high polarization of the debate about migration, an improvement of the access of all minorities to the media is needed.

Recommendations:

- **to the State, to the PSM and to the media industry: to promote gender equality in the newsrooms and in the companies' governance.**
- **to the State: to boost media literacy policies; to adopt a holistic media policy to tackle disinformation and hate speech online and offline.**

6. Notes

- [1] Vivendi SA v Autorità per le Garanzie nelle Comunicazioni, 2020
- [2] See AGCOM, Communications in 2020 - The impact of coronavirus in regulated areas - Annex to the Annual Report (AGCOM 2020)
- [3] See: <https://www.theguardian.com/world/2021/apr/06/italy-investigates-call-wiretapping-linked-to-migration-reporting-sicily>
- [4] See: EHCR 2019 Sallusti v. Italy (no. 22350/13) EHCR 2020 Magosso and Brindani v. Italy (no. 59347/11) Corte di Cassazione, n. 38721/2019
- [5] Corte Costituzionale, ordinanza n. 132/2020. Press communicate in English: https://www.cortecostituzionale.it/documenti/download/pdf/2020_06_09_diffamazione_giornalisti_en_20200610155344.pdf
- [6] More specifically, art. 13 of Law 47/1948 (Press Law) –providing for automatic provision of detention penalties in case of defamation through the press attributing a precise fact-was declared not compliant with the Constitution; art. 595 (3) of the Italian Criminal Code providing detention penalties between 6 months and 3 years for public defamation was not declared unconstitutional, but it was specified it should be used only in case of “exceptional severity”.
- [7] The government set up a committee against “fake news related to COVID 19” in the web and social networks. The committee had not supervisory or sanctioning powers; its task was limited to study and propose policies. The media authority issued a resolution regarding the correctness of information on COVID 19, recalling the audiovisual media to provide verified and correct information (Delibera N. 129/20/CONS).
- [8] See the Report “Foia4Journalists” “Administrations can deny the access to information; the denial must be adequately motivated, clearly mentioning the reason of the denial. But very often the administrations do not share in depth the reasons of the denial, limiting themselves to a quick and superficial denial”. (Transparency International Italy 2020)
- [9] Law 179/2017, Disposizioni per la tutela degli autori di segnalazioni di reati o irregolarita' di cui siano venuti a conoscenza nell'ambito di un rapporto di lavoro pubblico o privato. <https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2017;179>
- [10] See <http://www.politicheeuropee.gov.it/it/normativa/legge-di-delegazione-europea/legge-delegazione-ue-2019/>
- [11] See [https://www.anticorruzione.it/portal/public/classic/home/_RisultatoRicerca?id=1768d12e0a7780424f26e9063a65ad31&search=tutela whistleblowers](https://www.anticorruzione.it/portal/public/classic/home/_RisultatoRicerca?id=1768d12e0a7780424f26e9063a65ad31&search=tutela%20whistleblowers)
- [12] Data by the “Centro di coordinamento per le attività di monitoraggio, analisi e scambio permanente di informazioni sul fenomeno degli atti intimidatori nei confronti dei giornalisti”. The Centre, established in 2017, involves the Interior Ministry, the police, the National Federation of Journalists (FNSI) and the Order of Journalists. https://www.interno.gov.it/sites/default/files/2021-03/report_intimidazioni_giornalisti_febbraio_2021.pdf Threats verified and reported by the Italian civil society organization Ossigeno per l'Informazione, are higher than the official numbers: 123 cases of menaces in the first quarter and 127 in the second quarter of 2020 (Ossigeno per l'informazione, 2020). It is worth to note that often journalists do not report to the police the intimidation received, especially if online (in this regard, see Rita, Verza and Chiodi, 2020): this could justify the discrepancy between official numbers and those coming from independent monitoring. See also the alerts for Italy by Mapping Media Freedom: <https://www.mappingmediafreedom.org/country-profiles/italy/>
- [13] According to a recent research published by INPGI, regular employment decreased by 14% from 2012 to 2019 (-2.509 employees, - 454 in 2019), compared to 2,92% of overall employment. In the same

period, non-standard journalistic employment increased by 20.8% (INPGI 2020)

- [14] On the significant (ab)use of Strategic Lawsuits Against Public Participation (SLAPPs) in Italy, see McGonagle et al., 2020 and Pierobon, Rosà 2019.
- [15] According to Openpolis, a civil society watchdog on transparency of political process, "the lack of transparency of the appointment procedures has brought to the usual political dynamics" (Openpolis 2020). An analysis made by scholars Minervini and Piacentino shows that the new members have regulatory competences in 2 cases out of 5, and distance from politics and industry just in 1 case (Minervini, L., Piacentino, D., 2020)
- [16] Please note that the sentence in brackets has been corrected on September 2021
- [17] Art 21, par. 5, of the Italian Constitution: "The law can request the disclosure of the financial sources and press publications".
- [18] See Allegato A "Regolamento per l'organizzazione e la tenuta del Registro degli operatori di comunicazione", art. 19 (https://www.agcom.it/documents/10179/539083/Allegato_31-7-2018/f5bacaf3-a876-4135-9c95-674812bf4a7a?version=1.0). See also Access-Info - Italy: "In terms of transparency of ownership, it is important therefore that a media outlet is registered as a company, although ultimate ownership cannot be established even for companies (...). Furthermore, it is not possible for the public to access even the limited information that is disclosed to the media authority since not all of it is available online and the media authority exercises the "unchallengeable right" to identify who should and shouldn't have access to its online register". (<https://www.accessinfo.org/2013-08-01/italy-tmo-consultation/>). Here the access to the ROC website: https://www.agcom.it/elenco-pubblico?p_p_id=ricercaelencopubblico_WAR_elencopubblicoportlet&p_p_lifecycle=1&p_p_state=normal&p_p_mode=view&p_p_col_id=singlecolumn&p_p_col_pos=1&p_p_col_count=2&ricercaelencopubblico_WAR_elencopubblicoportlet_javax.portlet.action=searchInElenco
- [19] A further development which can change the balance between the three leading broadcasters occurred outside the time frame of the MPM assessment, with the acquisition by the DAZN platform of the broadcasting rights of the "Serie A" (premier league), with a significant step backwards for ComCast/Sky.
- [20] Following the change of governance and editorial line, some journalists and columnists of La Repubblica migrated towards Domani or other titles, like Il Fatto Quotidiano - an independent newspaper that, in contrast with the market trends, increased its circulation in 2020.
- [21] The SIC (Integrated Communication Market) includes: daily newspapers and periodicals; yearly and electronic publishing; radio and audiovisual media services; cinema; outdoor advertising; communication initiatives for products and services; sponsorships; and online advertising. The threshold of 20% of SIC has been perceived by several scholars as being too loose to effectively limit cross-media concentration. "The threshold set in the Testo Unico does not fit to an extremely concentrated system like the Italian audiovisual system, and - what's more important - threshold set for different markets are not weighed, neither in fact nor by right" (Zaccaria 2021)
- [22] See art. 4-bis decree 125/2020. This initiative - commonly called "save-Mediaset" - has been disputed by EC, on the basis that it had to be communicated to EC (see: <https://quifinanza.it/finanza/vivendi-ue-chiede-a-italia-notifica-norma-salva-mediaset/442063/>). AGCOM applied the new rule with a resolution on 15th December 2020 (delibera 662/20/CONS)
- [23] The success cases of Fanpage and Il Post are mentioned in CMDS (2020). For MPM, we interviewed Luca Sofri, editor-in-chief of Il Post, a niche digital native news media whose audience increased during 2020. "Il Post launched its newsletter on Covid 19 on 23th february, and quickly reached 80.000 members. Although the newsletter is free, it is a vehicle to acquire subscriptions - which jumped from

- 4-5.000 to 11.000 during the first lockdown, and continued to grow afterward". "Generally speaking, the small native digital news media were better equipped to counteract the shock. All the news media experienced a huge increase in attention - and reach - but without or with little monetization. In our case, the attention to quality, and the investments made in the previous years in the community as well as in the alternative economic stream, paid. Quite exceptionally, not only the alternative revenues increased, but the advertising revenue as well". See also: Bleyer-Simon and Carlini, 2021
- [24] Fund for pluralism and innovation, <https://informazioneeditoria.gov.it/it/approfondimenti-e-normativa/fondo-per-il-pluralismo-e-innovazione-dellinformazione/>
- [25] See Camera dei deputati, Le misure adottate a seguito dell'emergenza Coronavirus (COVID-19) per il settore dell'editoria, https://www.camera.it/temiap/documentazione/temi/pdf/1220430.pdf?_1621524118302
- [26] Concerns on a potential owners' influence arose when FCA applied for government support (the extraordinary public loan related to Covid crisis) and had to defend itself about the opportunity to access the loan even if it is fiscally based abroad: the Gedi newspapers argued in favor of the loan. In this occasion, the editor-in-chief of one of the group's newspapers, La Stampa, claimed for the independency of his judgement and his professional reputation; at La Repubblica the editor-in-chief refused to publish a communicate by the internal journalists' union that criticized the coverage of the story. Another case arose at Il Sole 24 Ore, with the journalists' internal union protesting against the growing presence of editorial content directly written or influenced by the publisher.
- [27] Law 215/2004, "Norme in materia di risoluzione dei conflitti di interessi", <https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2004;215>
- [28] The only exception is the newspaper "Il Giornale", which is partially controlled by Berlusconi's brother
- [29] Corte Costituzionale, sentenza 216/2019, <https://www.cortecostituzionale.it/actionSchedaPronuncia.do?anno=2019&numero=206>
- [30] In year 2019, the first 15 beneficiaries are: Dolomiten 2.899.696,66 euro Famiglia cristiana 2.815.239,58 euro Libero quotidiano 2.600.223,29 euro Avvenire 2.557.870,25 euro Italia oggi 1.877.056,37 euro Il manifesto 1.434.759,70 euro Il quotidiano del Sud 1.384.405,97 euro Cronacaqui.it 1.094.093,15 euro Corriere Romagna 1.060.843,66 euro Il Foglio 834.793,66 euro Primorski dnevnik 762.322,00 euro Editoriale oggi 746.907,17 euro Il Cittadino 675.607,59 euro Cronache di (Libra editrice) 640.524,69 euro Quotidiano di Sicilia 507.915,15 euro
- [31] Law 220/2015, Riforma della RAI e del servizio pubblico radiotelevisivo.
- [32] Since the budget law for 2016, a part of the surplus coming from the new method of collection has been shifted to the general budget and/or earmarked to other goals (from Fund for information's pluralism to a generic Fund for the reduction of tax burden). As a consequence, PSM annual budget ends up to depend partially on government's decision. In 2020 AGCOM called on the Government and the Parliament to provide Rai with stable financial resources, considering that the repeated changes of the legal framework concerning the use of the license fee resources were creating uncertainty. In the budget law for 2021 a part of the "extra-revenue" has been re-directed to RAI, to compensate the company from the financial losses due to the economic crisis.
- [33] The interview to Ivana Nasti and Paola Barretta have been collected by the MPM country team in 2020.
- [34] see RAI, Bilancio sociale, available at: <https://www.rai.it/trasparenza/Bilanci-b5a1b45c-a875-4d42-ba62-e51518b57fa7.html>
- [35] The interview to Maria Ranieri has been collected by MPM country team in february 2021.
- [36] see Wired.it, "Perché il Progetto Gutenberg sarà sotto sequestro per sempre", <https://www.wired.it/internet/web/2020/06/30/progettogutenberg-sequestro/>

- [37] It must also be noticed that the Italian government nominated a committee to counteract "fake news" online ("Unità di monitoraggio per il contrasto alla diffusione di fake news relative al COVID-19 sul web e sui social network"). The committee had not supervisory and fining powers; its task was to study and promote media literacy initiatives.
- [38] See: [https://www.agcom.it/documents/10179/18952580/Audizione al Parlamento 09-06-2020/0a9f973c-cd7f-4c90-9ef1-dbe1b3f0dc29?version=1.1](https://www.agcom.it/documents/10179/18952580/Audizione%20al%20Parlamento%2009-06-2020/0a9f973c-cd7f-4c90-9ef1-dbe1b3f0dc29?version=1.1)
- [39] See Freedom of the Net - Italy: "An investigation by Formiche found that the Chinese government and its proxies played a key role in spreading manipulated information about COVID-19 in Italian on Twitter in March. Bots generated much of the content promoting Chinese- Italian cooperation, which included the hashtags #forzaCinaItalia (go China and Italy) and #grazieCina (thank you China). Inauthentic accounts also posted criticism of the EU's response to the pandemic".
<https://freedomhouse.org/country/italy/freedom-net/2020>
- [40] Law 178/2020. art. 1 co. 515, 515 and 517
- [41] AGCOM, the media authority, supervises on media pluralism and regulation, AGCM on competition, also in media sector, DPA (Garante protezione dati personali) on data protection. The conclusions of the joint inquiry have been released on 10th February 2020, available at:
[https://www.garanteprivacy.it/documents/10160/0/Indagine conoscitiva sui Big Data.pdf/58490808-c024-bf04-7e4e-e953b3d38a9a?version=1.0](https://www.garanteprivacy.it/documents/10160/0/Indagine%20conoscitiva%20sui%20Big%20Data.pdf/58490808-c024-bf04-7e4e-e953b3d38a9a?version=1.0)
- [42] A542 - Aperta istruttoria nei confronti di Google per abuso di posizione dominante nel mercato italiano del display advertising . Available at: [https://www.agcm.it/dotcmsdoc/allegati-news/A542_avvio istruttoria.pdf](https://www.agcm.it/dotcmsdoc/allegati-news/A542_avvio_istruttoria.pdf)
- [43] The limits of the self regulation in the field of political pluralism online have been underlined in the AGCOM annual report 2019, p. 35 (AGCOM 2019). In the 2020 annual report, p. 25, the media authority reports about its activity in promoting self-regulation and the developments of the Technical Committee, mainly with regard with the issue of disinformation. (AGCOM 2020)
- [44] v. OSCE-ODIHR, Hate crime reporting - Italy. <https://hatecrime.osce.org/italy>

7. References

- AGCOM (2018). [Rapporto sul consumo di informazione](#).
- AGCOM (2020). [Relazione annuale](#).
- AGCOM (2021a). [Sistema integrato delle comunicazioni - Risultati del processo di valutazione](#).
- AGCOM (2021b). [Osservatorio sulle comunicazioni. Monitoraggio COVID-19](#). N. 1/2021.
- AGCOM (2021c). [Osservatorio sul giornalismo. La professione alla prova dell'emergenza COVID-19](#).
- BANCA D'ITALIA (2021). [Bollettino economico](#).
- Bleyer-Simon, K. and Carlini, R. (2021). Media Economy in the Pandemic: a European Perspective. [Technical Report](#), Centre for Media Pluralism and Media Freedom.
- Brogi, E., Carlini, R. (2020). 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: Italy](#).
- Cappello M. (ed.) (2020). [Media pluralism and competition issues](#), IRIS Special, European Audiovisual Observatory.
- Carta di Roma (2020). [Notizie di transito](#).
- CENSIS (2020). [Rapporto sulla comunicazione](#).
- CMDS (2020). [Media influence matrix: Italy](#).
- CoE (2020a). [Respecting democracy, rule of law and human rights in the framework of the COVID-19 sanitary crisis](#). A toolkit for member states.
- CoE (2020b). [Annual Report by the partner organisations to the Council of Europe Platform to Promote the Protection of Journalism and Safety of Journalists](#).
- Draghi, M. (2021). [Foreword to PNRR](#).
- EB92 (2020). [Media use in the European Union](#).
- Freedom House (2021). Freedom on the Net 2020, [Country report: Italy](#).
- ISTAT (2021a). [Indicatori demografici - anno 2020](#).
- ISTAT (2021b). [Pil e indebitamento AP](#).
- INPGI (2020). [Rapporto sulle dinamiche occupazionali nel settore giornalistico](#).
- Maglia E, (2020). [Donne & giornalismo: un'importante dimensione della disuguaglianza di genere](#), in EticaEdEconomia
- McGonagle T., Ó Fathaigh R., Bouché G., Rucz M., Stapel S., Seel M., van der Sanger A. (2020). [Safety of journalists and the fighting of corruption in the EU](#), Policy Department for Citizens' Rights and Constitutional Affairs Directorate-General for Internal Policies.
- Minervini, L. F., Piacentino, D. (2020). [Sulle nomine AGCOM continua a comandare la politica](#), in lavoce.info.
- Newman, N. et al. (2020). [Reuters Institute Digital News Report 2020](#).
- Openpolis (2020). [Nomine authority, la rete di collegamenti](#).
- Ossigeno per l'informazione (2020). [Rapporto trimestrale](#).
- Pierobon C., Rosà P. (2019). [SLAPPs: the Italian Case](#).
- Rita M. F., Verza S., Chiodi L. (2020). [Interviewing journalism. Needs and gaps in support for European journalists](#), Osservatorio Balcani Caucaso Transeuropa and MFRR.
- Transparency International Italy (2020). [FOIA4journalists](#).
- Verdelli, C. (2019). Roma non perdona. Come la politica si è ripresa la RAI. Feltrinelli.
- Verza S. (2017). [Italy: a case endangering journalists' rights to report and protect their sources](#), Global Freedom of Expression, Columbia University.
- Vivendi SA v Autorità per le Garanzie nelle Comunicazioni (2020). Court of Justice of the European Union, [Case C-719/18/Judgment 03/09/2020](#).
- Zaccaria et al. (2021). Diritto dell'informazione e della comunicazione, Wolters Kluwer - Cedam

Annexe I. Country Team

First name	Last name	Position	Institution	MPM2021 CT Leader
<i>Roberta</i>	<i>Carlini</i>	<i>Researcher</i>	<i>Centre for Media Pluralism and Media Freedom, European University Institute</i>	X
<i>Elda</i>	<i>Brogi</i>	<i>Scientific coordinator</i>	<i>Centre for Media Pluralism and Media Freedom, European University Institute</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>Giovanni</i>	<i>Gangemi</i>	<i>Representative of media regulators</i>	<i>Autorità per le garanzie nelle comunicazioni (AGCOM)</i>
<i>Benedetta</i>	<i>Liberatore</i>	<i>Director, Audiovisual content</i>	<i>Autorità per le garanzie nelle comunicazioni (AGCOM)</i>
<i>Isabella</i>	<i>Splendore</i>	<i>Head of Legal and International Department</i>	<i>Federazione italiana editori giornali (FIEG)</i>
<i>Vittorio</i>	<i>Di Trapani</i>	<i>USIGRAI secretary - FNSI vicepresident</i>	<i>Federazione nazionale stampa italiana (FNSI)</i>
<i>Rosy</i>	<i>Russo</i>	<i>Founder and President</i>	<i>Associazione Parole O_Stili</i>
<i>Fabio</i>	<i>Chiusi</i>	<i>Project Manager</i>	<i>Algorithm Watch</i>
<i>Andrea</i>	<i>Stazi</i>	<i>Senior Manager, Regulatory Affairs Lead Italy, Greece, Malta & Academic Outreach</i>	<i>Google Italia</i>

Research Project Report

Issue 2021.2824

July 2021

doi: 10.2870/22399

ISBN: 978-92-9466-042-8

QM-02-21-687-EN-N



Publications Office
of the European Union

