

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: Latvia

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1. About the project

1.1. Overview of the Project

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

1.2. Methodological note

Authorship and review

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

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

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

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness	
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities	
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media	
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women	
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Media Literacy	
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech	

Table 1: Areas and Indicators of the Media Pluralism Monitor

The digital dimension

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

The calculation of risk

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

Scores between 0 and 33%: low risk Scores between 34 to 66%: medium risk Scores between 67 and 100%: high risk

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

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

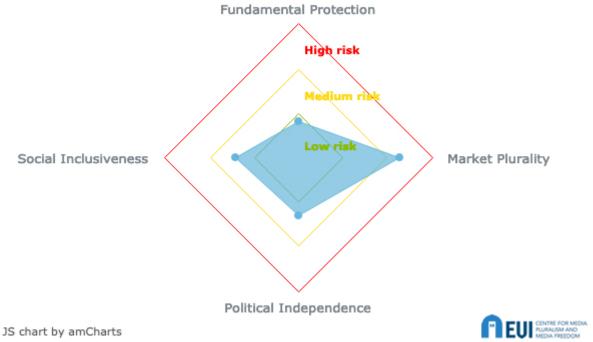
2. Introduction

- **Population:** According to the data of the Statistical Yearbook of Latvia, in 2020, Latvia (64,500 square kilometres) had a population of 1.9 million (Central Statistical Bureau of Latvia, 2021).
- Minorities and languages: Latvia is not ethnically homogenous: 62% of the population is Latvian, 25% Russian, 3.2% Belarussian, 2.2% Ukrainian, 2.1% Polish, 4% other. Sixty-one percent of the Latvian population speaks Latvian as the first language, 36% Russian, 3% other (Central Statistical Bureau, 2018). The largest historical regions of Latvia (Kurzeme, Zemgale, Vidzeme) has most of the population speaking Latvian in the family (75%-91%). However, the Eastern region of Latgale paints a different picture: 60% of the population speaks Russian in the family, 39% speaks Latvian (Central Statistical Bureau, 2020). In the capital city Riga, most of the population speaks Russian at home (56%), whereas 43% use Latvian.
- Economic situation: The Gross Domestic Product (GDP) amounted to 35.5 billion euros in 2020. Due to the pandemic, inflation in Latvia was 0.2% in 2020. The unemployment rate increased slightly during the year, reaching 8.3% (from 8.1% at the beginning of 2020) of the economically active population in December 2020. Data compiled by the Central Statistical Bureau (CSB) show that in 2020, compared to 2019, GDP reduced by 3.6 %. In 2020, GDP at current prices amounted to EUR 29.3 billion (CSB, 2021, February 26). In the field of media, the pandemic year marked the deterioration of the economic situation of media companies, as advertising investments decreased by 20% to 30% (Association of Advertising of Latvia, 2020). In order to reduce the consequences of COVID-19 in the media sector, from April to September 2020, with the help of the Media Support Fund, more than 1.5 million euros were allocated to Latvian media in three competitions. Later, support for media organisations was increased and reached 3.5 million euros in 2020. Part of the funds is distributed to content creation projects', part of the funds covers postal delivery bills for press publications and broadcasting costs for broadcasters (up to 350,000 euros). Thus, funds were allocated both for fixed costs, ensuring the day-to-day operation of media organisations, and for creating and improving the quality of content, including analytical and investigative journalism projects.
- Political situation: The latest parliamentary elections in Latvia took place in 2018. After the elections, the coalition government, whose Prime Minister Krišjānis Kariņš represents the New Unity party, is formed by the party Who owns the state? (16 seats from 100), New Conservative party (16 seats), Development / For! (13 seats), National Alliance (13 seats), New Unity (8 seats). The opposition is represented by Harmony (23 seats) and the Union of Greens and Farmers (11 seats). Analysing political systems, economic development, and consequences of media privatisation in 21 CEE states, Dobek Ostrowska (2015) placed Latvia in the Hybrid Liberal Model. It means that country has acquired a "free" country status. At the same time, Latvia belongs to the group of flawed democracies.
- Media market: Media choice in Latvia is largely determined by ethnic group and geographical factors. Representatives of different ethnical groups in Latvia acquire their daily information from different sources; Latvians generally trust and use the media in Latvian, whereas the Russian-speaking prefer the TV channels controlled by the Russian government (Nacionālā elektronisko plašsaziņas līdzekļu padome, 2017, 2018, 2020). Survey data shows that the population of Latvia still prefers television over other media (89% of respondents) (Nacionālā elektronisko plašsaziņas līdzekļu padome, 2020). 83% of the population listen to the radio, 79% read news on the Internet, 72% use social media, 71% read the press in print or online.

- Regulatory environment: The liberal structure of Latvian media regulation allowed a diverse media system to develop. At the same time, the media environment is characterized by oligopolistic competition and a high level of concentration (Jastramskis et.al, 2017). The Latvian media system is described as hybrid because it lacks a dominant paradigm (Skudra et al., 2014). In order to reduce the impact of global platforms on the media market, at the beginning of 2020, discussions on the introduction of a digital tax were started in Latvia, but no decisions were made. In 2020, changes took place in the field of media regulation, with the adoption of the new Law on Public Service Media and its Governance. One of the main tasks of professional media was to fight disinformation about pandemic issues.
- COVID-19: While in April 2020, Latvia had one of the lowest rates of COVID-19 in the world (SPKC, 2021), the second phase, which began in October 2020, was characterized by the rapid spread of the disease, which created a risk of the healthcare system collapse, and led to the second state of emergency beginning 9 November 2020 and lasting till 6 April 2021. The media created special sections for the COVID-19 pandemic, and commercial online news portals announced that they are removing the paywall for information related to the pandemic. At the beginning of 2020, more than 60% of the population trusted the information provided by the Latvian media. However, during the pandemic, public confidence in the media and journalists declined (RSU/SKDS, 2020). According to public opinion polls conducted during the COVID-19 pandemic, the Latvian society is medium-resilient to the disinformation: more than half of respondents admit that they are able to distinguish true information, only one-sixth of respondents are likely to indicate misleading messages and conspiracy theories about COVID-19 as true (Dovladbekova et al., 2021). Latvian media and fact-checking organizations also regularly follow the current disinformation messages and their spread, paying attention to how disinformation has been distributed via social media sites (SNS) (Bērziņa, et al., 2020). Facebook (FB) is the most influential SNS in Latvia, where Internet users make up 90% (CSB, 2020) of the population, of which 82% (Degtjarova, 2019) are regular FB users. To contextualise media usage in the pandemic year, it should be mentioned that Latvia's 1.92 million inhabitants increased online media consumption. In 2020, the share of households with the Internet had reached 89.7%, and the number of regular Internet users reached 86.9 % (Central Statistical Bureau, 2020).

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

Latvia: Media Pluralism Risk Areas



In 2020, in Latvia a low risk is still preserved in the field of **Fundamental Protection (27%)** that refers to the protection of freedom of expression, protection of right to information and the access to the Internet, independence and effectiveness of media authority, and journalistic profession, standards and protection. The data show that access to information and freedom of expression in the country are guaranteed by a legal framework. In Latvia, access to information is enshrined in the constitutional laws, the government has accepted international agreements regulating access to information and the right to information. In 2020, a new law on Public Service Media and Its Governance was adopted, which is intended to reduce the political influence on the public media authority. The law entered into force on 1 January 2021.

Market Plurality indicators constitute a high risk situation (75%) due to increasing news media and online platform concentration, according to MPM2021 data. The highest increase in concentration is in digital news media field. Although Latvia has a sufficient level of media viability, media regulatory measures do not envisage sufficient concentration restrictions in the small media market (for example, there are no restrictions on horizontal or cross-media concentration). The high risk of market plurality is determined by the commercial and ownership influence on media content, as well as the lack of transparency of media owners. In 2020, when advertising investments decreased during the pandemic, the continued existence of small, independent media companies was endangered. In this group of indicators, only media viability data indicate a medium risk situation. This shows that Latvian media organizations are gradually adapting to market changes and restructuring their revenue structure, offering both new services and products and introducing modified subscription services.

The **Political Independence** area reflects a medium risk **(43%)** situation. It is made up of low-risk media pluralism indicators, which reflect state regulation and support for media and independence of PSM funding. The indicators for the political independence of media and editorial autonomy remain medium, close to high risk. Media regulation measures are only partially able to support the development of independent media, as

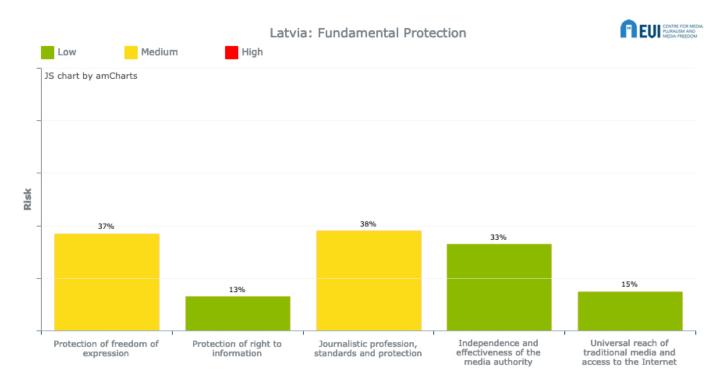
there are tendencies of instrumentalising the media (Dimants, 2019) and some newsrooms employ "collaborative practices" to please their advertisers (Rožukalne, 2020).

The **Social Inclusiveness** area indicates a medium risk situation **(47%)**. This reflects a low risk for access to the media for minorities, a medium risk for access to media for local / regional communities and to community media, and access for women, and the high risk of media literacy development in Latvia. The main reason why protection against illegal and harmful speech shows a medium risk situation is the contradiction between well-developed universal legal framework and the lack of regulation aimed specifically at online hate speech.

The slowdown in economic activity during the pandemic hampered the search for new sources of income for media companies. With the help of the Media Support Fund, established in 2016, the taxpayer's money was allocated to support commercial media operations. Latvian PSM funding was increased to prepare for exit from the advertising market on 1 January 2021.

3.1. Fundamental Protection (27% - low 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.



In 2020, in Latvia, a low (close to medium) pluralism risk is still preserved in the area of **Fundamental Protection** that refers to the situation of protection of freedom of expression (37%), protection of right to information (13%), journalistic profession, standards and protection (38%), independence and effectiveness of media authority (33%), and the universal reach of traditional media and the access to the Internet (15%).

The data show that access to information and freedom of expression and protection of right to information in the country is guaranteed by a legal framework. Latvia has accepted all major international agreements in the field of freedom of expression and media. Free access to information in Latvia is also

ensured by the new Whistleblowing Law^[1], which was adopted by the Latvian Parliament in 2018. This law has been in force since 1 May 2019. According to the statistics of the Whistleblowing Contact Centre in 2019, 435 applications of whistleblowing cases were received, 119 applications were recognised as compliant. Most of the applications concern the State Revenue Service and the Office for the Prevention and Combating of Corruption (Data on 2020 are not available at the time of writing this report).

Journalistic profession, standards and protection situation shows medium (38%), close to low risk. The right of journalists to gather information and protect their information sources is guaranteed by law, and there have been no physical attacks on journalists in recent years. However, in reality, journalists in Latvia are constantly facing restrictions on access to information by officials. Although there is a strong legal basis that protects rights to access information, journalists are complaining about the limitations of information access from state institutions on a regular basis. In December 2020, the Association of Latvian Journalists established the Centre of Legal Support for journalists. According to the Chair of Board of Association Arta Giga, the centre will help deal with freedom of expression and issues related to access to information. However, the job market for journalists remains very volatile, with some media organizations limiting their social security payments to journalists in an attempt to cover a portion of their work with royalties. In addition, journalists are increasingly exposed to regular attacks in the online environment. These attacks are often initiated by politicians or political communications companies with the aim of undermining journalists' professional reputation and invading their privacy. In 2020, there was one case reported by investigative journalists of RE:Baltica Inga Springe and Sanita Jemberga (Jemberga, 2019). Although the RE:Baltica case led to an agreement by the Latvian Association of Journalists that the police had a specific employee to turn to in the event of an attack or threat, the police closed the criminal case. However, the man who opposed the editorial office continued to send threats and harass RE:Baltica journalists in the autumn of 2020.

The Association of Latvian Journalists is active in protecting editorial independence and support journalists who respect professional standards. The organization is an active member of public discussions on media and journalist independence and professionalism, but its impact is rather low. The problem is that only a small part of media professionals are members of professional organizations.

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

MPM data shows a low risk situation with regards to the **independence and effectiveness of the media monitoring authority** (33%). Currently, the Latvian public service media (PSM) is governed by the National Electronic Mass Media Council (NEMMC), which also is the regulator of commercial electronic media. The NEMMC is composed of five members elected by the Parliament. This means that political influence can be observed in some cases in the operation and decisions taken of the NEMMC.

In 2020, a significant turning point took place in the field of media regulation in Latvia, as at the end of the year, the Latvian Parliament approved a new Law on Public Media and its Governance. At the beginning of 2021, the new PSM council is being formed. According to the new law, the PSM council consists of three members, who are approved by the Saeima (Parliament). New PSM council members are nominated for approval according to the following structure: one member is nominated by the President of the State; one member is nominated by the Council for the Implementation of the Memorandum of Cooperation between Non-Governmental Organizations and the Cabinet of Ministers, and one member is nominated by

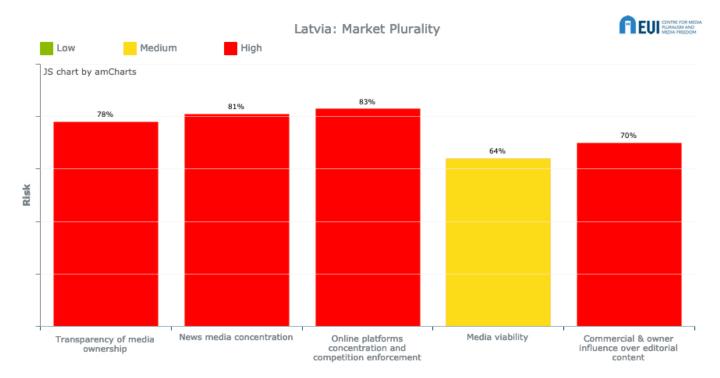
Parliament. The composition of the election of the new council is designed to reduce the influence of politicians in the process of its formation.

Regarding the universal reach of traditional media and the access to the Internet monitoring data shows low risk (15%). The broadband coverage makes 93% in Latvia, the average Internet connection speed in Latvia is 52 Mpbs.

Media usage data of 2020 (NEPLP/Latvijas Fakti, October 2020) identifies that the Latvian population's media choice has not changed significantly in the last years. Similarly to 2018-2019, in 2020, the most popular medium was television, which was watched by 89% of the population (84% -watch TV at least once a week; -60% of respondents watch television every day or almost every day). Internet news portals were used by 80% (47% daily, 73% - at least once a week) of respondents of the national representative survey. Social media were used by 75% (54% - daily, 71% - at least once a week) of respondents, radio listening habits are stable over the years – 80% of respondents listened to the radio (45% - daily, 65% - at least once a week), 73% of respondents admitted that they read press (11% - daily, 49% – at least once a week). However, traditional media usage is gradually declining by 1-2% a year.

3.2. Market Plurality (75% - high risk)

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



The **Market Plurality** area in Latvia has scored high risk (75%) since 2019. The risk identified in four out of five analysed indicators in this area reaches high risk. The results from data collection offer several explanations. The high risk has been identified in the indicator on online platforms concentration and

competition enforcement (84%). Also, news media concentration results show high-risk level (81%), transparency of media ownership (78%) and commercial and owner influence over editorial content (70%) demonstrate high risk. Indicator on media viability shows medium risk (64%).

The analysis of risks related to **Transparency of media ownership** shows significant changes related with the data availability transformation. Since the end of 2020, basic information (names of persons) about media owners and beneficaries is available free of charge in the database of the Enterprise Register of the Republic of Latvia Lursoft. To obtain this information, you must register in the the mentioned database or identify yourself with your i-bank information. Still, data on the historical changes of media owners, financial data, information on the participation of media owners in other companies is not available free of charge. In order to obtain information about media owners and true beneficiaries, it should be purposefully searched in the Lursoft database.

Media companies have to provide ownership and beneficiaries data to State Companies Register in case of registration/change of ownership/beneficiaries. Some media inform about their owners on their online website. Audio-visual media, e.g., radio and TV channels, internet television companies, cable or internet television firms have to inform electronic media regulator about their owners. But there are no regulation rules that stipulates disclosing of ownership data to general public, for instance, publication of these data in company webpage. Practically, the ownership data of audio-visual media are available at the web page of National Electronic Mass Media Council in the section where broadcasting licence data are explained. Information about the owners and the real beneficiaries is provided if the media participates in the Media Support Fund's tender for the use of taxpayers' funds to create quality content.

Generally, the level of media market concentration in Latvia is high in all media segments. There are no legal thresholds in terms of number of licences, audience share, circulation for media market players. Even more, specific regulation that prevent horizontal, vertical or cross-media concentration does not exist in Latvia. Media and competition regulation provide overall protection for competition and the diversity of the media environment, but it is not suited to a small national media market where due to small and linguistically divided media audience, only a few players can succeed in each media segment.

The News media concentration situation remains in a high-risk position. It is determined by the conditions of media activity in a small market and media regulation conditions that do not limit horizontal and cross-media concentration. The Latvian Competition Council assesses the market shares of media market players only in cases where media organizations announce a merger. For example, the Top4 audiovisual media market share is 56%; the market share of the Top4 radio owners makes 71%; Top4 online news media market share is 53%. The only way to limit horizontal concentration is merger of companies, especially if media companies are included in the list of commercial companies significant to national security. There are no limits according to number of licenses, audience share, circulation etc. for press and the Internet media market.

There is the universal regulation in the Law of Competition that defines a dominance position on the market from 40% of the market share for all companies, excluding bradcasting media, for which the dominant position may not exceed 35%.

The universal legal basis of competition regulation applies to **online platforms concentration and competition enforcement.** Regulation included in the Commercial Law eventually will be put in force only in case of merger of online media companies. Latvia has not introduced regulatory measures that could ensure equal competition of national media in the online environment and prevent the impact of global platforms on the advertising market (see more in chapter 4).

Media viability analysis shows contradicting results. The fundamentals of the economic existence of the media are becoming increasingly precarious, but part of media organizations have been able to adapt to changes in their business models in a short period of time and are looking for new forms of income generation both inside and outside the media business. Part of professional media in Latvia have adapted to the new business models and more or less successfully struggling for new revenue sources. There is no separate data on revenue change of news media sector selected in the Baltic Media Health Check (BMHR) report, still, revenue changes can be evaluated according to information provided by CEO of largest news sites, TV and radio channels that have their news services, etc. According to the BMHCR, media representatives forecast decrease of their revenue from 10-15% in 2020. For example, Delfi, which is larger digital news company in Latvia (and Baltic States) saw its revenue drop during the peak of the pandemic in the second quarter of the year, but the plunge did not reach 30%.

The most unstable are the existence of local and regional and local media, mainly newspapers, as even before the COVID-19 crisis their advertising revenues were very low and retail revenues declined. According to Ivonna Plaude, a representative of the Latvian Journalists' Association, without government support, many regional media companies would be forced to close down. Paradoxically, the number of visits and audience of regional media websites increased rapidly during the COVID-19 crisis, but media organisations did not have the resources to monetise the growing audience and increase revenue from regular digital information provision.

The evaluation of **commercial and ownership influence over editorial content** is one of the most complicated tasks within MPM activities. There are some explanations that illustrate situation in Latvia. Legal acts analysis shows that there are no mechanisms granting social protection to journalists in case of changes of ownership or editorial line of media companies in Latvia. The regulatory safeguards, which seek to ensure that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests do not exist in Latvia. Likewise, there are no regulatory safeguards or self-regulatory measures stipulating the obligation of journalists not to be influenced by commercial interests.

Interviews with editors and journalists of various media organisations (national, local, print, TV and radio, online) identify that media owners commercial interests are the main factor that limit editorial independence and cause self - censorship. Nevertheless, there are few media firms that build their business activities on collaboration with political parties or politically influential individuals. Research project (Rožukalne, 2020) on internal and external sources of self-censorship in various media (national / local, commercial / public) organisations identify that in many editorial offices, the interests of advertisers were named as the dominant external factor encouraging self-censorship. This is followed by political pressure; almost half of the journalists (49%) felt that they had to take into account the interests of their business owners and the latters' political allies. When comparing political and economic pressure, the political influence was mostly described as 'moderate' and 'subtle', whereas the demand to serve economic interests was defined as 'powerful' or 'routinized'.

Journalists accept the dual character of their professional activities as inevitable. Serving certain political interests is not merely a reaction to external factors in the media environment, but is the essence of these media companies. In fact, journalists consider themselves to be responsible for contributing to their medium's profit goals. Media firms merge the existing editorial values with collaboration, adaptation and business thinking. They regard the merger of editorial and commercial departments as undesirable, yet as an inevitable part of professional practice in Latvia. The limitations of professional autonomy are compensated for by the possibility of defending the medium's economic sustainability.

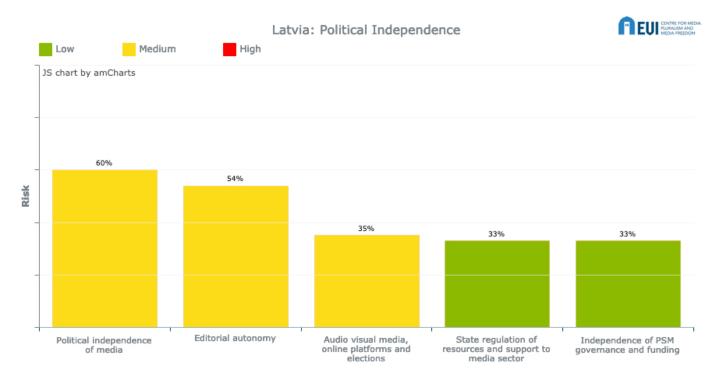
Self-censorship no longer means only the exclusion or reduction of professional values, but rather their dispersal and displacement. Thus, while maintaining a clear understanding of the principles necessary for the existence of the profession, journalists either deliberately or unwittingly adapt their daily practices to

meet the expectations of their media owners.

The number of media outlets is slowly decreasing in 2020. One of national dailies "Neatkarīgā Rīta Avīze (Independent Morning Paper) ceased to be a paper edition, becoming only a digital edition. The largest national daily Latvijas Avīze (Latvian Newspaper) sold its digital medium la.lv to commercial television company RigaTV24. Regional newspaper (Kursas Laiks (Kursa Time) was merged with its competitor Kurzemes Vārds (Voice of Kurzemes) in Kurzeme region (Western part) in Latvia. TV channel LNT and its news department has been closed at the end of 2019, now there is only one commercial TV news service in Latvia (TV3 news service).

3.3. Political Independence (43% - 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.



While evaluating the indicators that characterise the level of **political independence**, deterioration of the situation was observed. The highest concern is about the **political independence of media**; this indicator shows medium risk (60%). The attempts to gain political control over media outlets have not decreased over several years, this means that two of the leading dailies (Diena, Neatkarīgā Rīta Avīze) are still associated with or controlled by political actors, and there is political influence in the largest TV channels (for example, Perviy Baltijskiy Kanal (PBK)). Legal and self-regulatory measures formally protect independence and autonomy of media, but the media law does not guarantee autonomy when appointing and dismissing editors-in-chief. [4]

The analysis of the protection of **editorial autonomy** (risk level 54%) shows medium risk and characterizes situation when the editorial autonomy principle is formally present in the Press and the other Mass Media

Law, but, in fact, it represents the declarative character of the aforementioned norm, as there is no developed mechanism of the protection of editorial independence in practice. Practically, editors have to accept the commercial interests of their owners. Many commercial media editors in Latvia are increasingly catering to the interests of advertisers by engaging in collaborative practices to support the sustainability of media companies (Rožukalne, 2020). In practice, this means that journalists simultaneously produce professional content and promotional articles, news, interviews for the needs of their media advertisers. Although media editors believe that political influence is insignificant and invisible, influential news media owners are still closely associated with politicians in Latvia.

The pre-election campaigning law has been amended in Latvia with the aim of adapting to the increasing pre-election communication activities in the digital environment. Therefore, the indicator that describes the conditions of **audio visual media**, **online platforms and elections** shows medium (close to low) risk (35%). In 2020, the only election that took place in Latvia was the election to the Riga City Council. In accordance with the law, the Bureau for the Prevention and Combating of Corruption monitors the compliance of party pre-election expenses with the law. During the pre-election period, political agitation was also monitored on social media and a number of cases were initiated (KNAB, 2020).

At the same time, there are at least two indicators that demonstrate significant changes in media policy in Latvia. Despite the fact that Latvia can be found among the countries with the lowest level of Public Service Media funding, the indicator of **PSM governance independence and funding** shows low (albeit close to medium) risk (33%). During 2020, regulatory enactments were prepared so that public media could leave the advertising market as of 1 January 2021. As compensation for the lost advertising revenue and in order to maintain the current level of activity, the public media received 5.5 million euros in 2019 and additional 8.3 million euros in 2020 (Rozenberga, 2020).

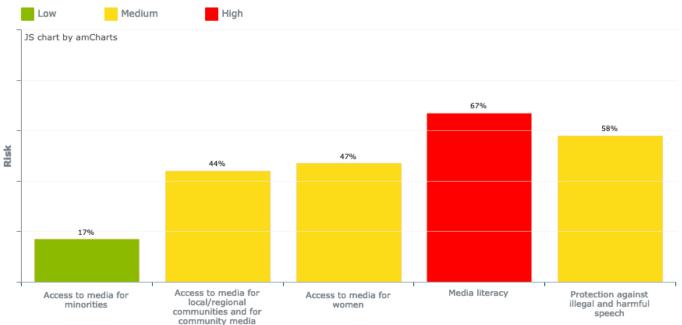
The operations of a recently (2017) established Media Support Fund that provides support for quality media content using taxpayers money changed the result of the indicator of **state regulation of resources and support to media sector** to a low-risk level (33%). The Media Support Fund activities had a positive impact on the content quality of professional media organisations, but this support is rather low (about 1.2 million euro per year) and very fragmented. As mentioned before, in 2020 the Media Support Fund allocated 3.5 million euros as a support for commercial media operations during the pandemic. The format of support is short-term and projects-based, therefore, activities of the Fund lack sustainability. In fact, there are no significant changes in the system of state support to media. Even more, the long-awaited introduction of a new reduced value-added tax, which would apply not only to the press but to online news media operations as well, has not been accepted in Latvia in 2020.

3.4. Social Inclusiveness (47% - 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.







Medium risk was shown in the analysis of indicators in the **Social Inclusiveness** area (47%). Compared to the data of 2020 (41% of risk), the situation remains at the medium risk level, with a slight upward trend in risk, which could be caused by problems with community media development and growing vulnerability of women (journalists, politicians, NGO activists) to hate speech and other attacks in the online environment.

Although public Media literacy has been one of the priorities of Latvian media policy since 2016 and has a stable place in public discourse, media literacy activities are mainly aimed at children and young people. Due to geopolitical circumstances, media literacy activities focus on news deconstruction and information environment security risks. Media literacy situation in a country has been identified as high risk (67%) for the first time since the MPM includes this indicator. A 2015 analysis of media literacy activities outside the formal education system found that, since 2010, media literacy projects in Latvia have mostly been implemented by professional associations of technology and by Internet companies; therefore, these projects cover a small fraction of media literacy tasks and audiences (Freibergs, 2015). A report on media literacy by the Audiovisual Media Observatory underlines that public-private partnerships in the development of media literacy are to be welcomed; however, the structure of this cooperation in Latvia shows that policymakers do not have clear media literacy development priorities. Latvia's media literacy policy focuses too much on young people as a target group, but no strategy has been developed to reach other target groups, such as seniors, people with low digital skills, people who are not interested in media literacy (52%, according to survey in 2019) (Rožukalne et al., 2020). At the same time, media literacy is not sufficiently developed in the content of formal education. According to public opinion poll data, Latvians expect that media literacy issues are addressed at all levels of education and that people are informed about media literacy through the media. However, media policy documents stipulate that media literacy in higher education is provided only in the content of pedagogical studies. Media literacy content in the Latvian media shows that journalists associate media literacy with exposing Russian misinformation, paying less attention to other media literacy issues.

Evaluation of **Protection against illegal and harmful speech** shows medium risk (58%). There is well-developed legal framework to protect citizens against harmful speech (Criminal law, Section 231)^[6], but there is no specific regulation aimed at online hate speech. Even more, there are several court cases related to online hate speech. Still, there are many barriers (e.g., lack of instruments, long investigation

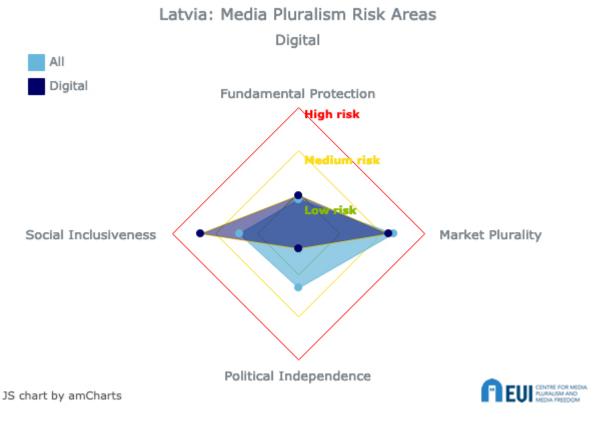
process, long court hearing processes) that make complicated countering online hate speech in Latvia. There is huge problem with hate speech and verbal harassment expressed towards women (politicians, journalists, authorities, activists, artists etc) in social media in Latvia (Zelče, 2018).

Access to media for local/regional communities is evaluated as medium risk (44%). Formally community media is not recognized by media law of Latvia. There is no developed system of community media in the country. However, an extensive network of local and regional commmercial media is developed in Latvia. According to their functions, content, target audience and various activities (for example, involvement in local culture development), these media informally correspond to the status of community media. In the same time, local/regional or community media development is threatened by demographic, economic and political factors. The number of economically active population in many regions of Latvia is decreasing, therefore the income of local media companies is diminishing (Central Statistical Bureau of Latvia, 2021). As a result of these circumstances, the majority of independent local and regional media have reduced the number of issues per week, and there are currently no daily regional newspapers in Latvia. In terms of indirect subsidies (e.g. tax reduction or reduction of postal delivery service) local and regional media are equally qualified as other media. In addition, there are direct regular subsidies for regional/local media via Media Support fund. Still, interviews with representatives of local / regional media show that the state subsidies provide support in the context of the COVID-19 crisis, but support measures are insufficient for local / regional media to exist and develop.

Access to media for women (47%) shows a contradictory picture. In Latvia, the majority of journalists (about 65%) are women. Many women work as editors-in-chief in important national and regional media. The board of Latvian Radio consist of women only. However, there are far fewer women in leadership positions in commercial and digital media, and there is no gender equality policy developed in PSM organizations. Regarding the representation of women in news, the overall situation shows that they are proportionally represented. However, recent research project show that their representation is not free form stereotypes (Zelče, 2018). While men tend to dominate in discussion programs, female participants represent less attractive and low paid positions: social care workers, teachers (all education level, including pre-school).

Although minorities are not clearly defined in law, Access to media for minorities (17%) shows low risk. The ethnic religious and linguistic minorities have a broad access to airtime of PSM channels. There are diverse set of channels and media formats that provide content in minority languages, including program "Hear voices" on small dialects at Latvian Television and Latvian Radio. Religious groups are represented in many programs, including news and current affairs, even more, there are specific religious program "Roots in the sky" at LTV1. Support for media offering content in Latgalian language (dialect of Latvian language) has gradually increased. Media content provided in minority languages is stable, there are many commercial media channels in all media segments that provide content for ethnic minority audiences. Regarding access to media for people with disabilities, the country does not have a stable policy. There are fragmented activities that can be structured according to the content and presentation feature: programs about the problems of disabled people; news programs using plain language approach on public radio main channel, and usage of sign language during particular programs in PSM (news, entertainment), subtitles (documentary, series, movies). The amount (hours, number) of content available to people with disabilities is gradually increasing on PSM channels and platforms during few last years. There are no programs for minority audiences with disabilities in commercial media channels. In sum, the PSM strategy envisages increasing the content for people with disabilities, but no regulation has been created that would force commercial media to take into account the needs of people with disabilities in the content production process.

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



Analysis of digital environment pluralism indicators shows that the Fundamental Protection indicators data reflects medium-level risks (48%). Latvia society has **universal reach to media and access to the Internet**; up to 78% of the population use the Internet on a regular basis. General Laws protect **freedom of expression** in the offline as well online environment. Latvia has adequate regulation to guarantee **net neutrality**, and in recent years there has been no violation of net neutrality by the government.

The online platforms concentration and competition enforcement data shows high risk situation (83%). This figure characterizes both the way in which people access online news and the impact of global platforms on the national media market. The audience concentration of the Top4 online players is 55%, and advertising share of the Top4 online players make 85%. According to the data that comes from Baltic Media Check research (Krūtaine & Jemberga, 2019/2020) more than half or internet users in Latvia reach online news either via platforms of global information intermediaries (e.g. google.com) or via social media (Facebook, Twitter, Instagram). The lack of regulation regarding the presence and influence of global platforms in the national advertising market creates a particularly fierce competitive situation in Latvia. Due to the influence of the platforms, the national media is rapidly losing advertising revenue, without the possibility to find other sources of income in a short time. According to information given by director of Latvian Advertising Association Baiba Liepina, there is no information about precise digital ad market, including lack of information on the share of global platforms in Latvian ad market. The reason of this situation is that companies have a right not do disclose "commercial secret". Data provided by Association of Latvian Advertisers shows that five platforms attract about the half of all ad investments in Latvia. Using data from the State Revenue Service, the Latvian Advertising Association estimates that international platforms attracted 81.7 million euros in 2018 and 104.5 million euros in the first ten months of 2019. The advertising market for other media made 85 million euro in 2018. Liepina assumes that global networks control about 50% of ad market in Latvia.

In the very beginning of 2020, discussions on possible digital tax schemes began with the aim, firstly, to protect the sources of income of the national media, and secondly, to find resources to support the activities

of the national media. During these discussions, two scenarios were discussed: whether to wait for an EU-level solution or to follow the example of some countries and introduce a digital tax in Latvia before an EU-level solution is found. Still, there is no development observed to any of mentioned directions during 2020. Describing the effectiveness of the Latvian Competition Council in the field of competition enforcement online is very difficult, because the operation of global platforms is subject to universal conditions of competition regulation in Latvia. This means that the competition and concentration authority can only intervene in case of mergers of companies.

Analysing the risks to **digital pluralism** in the area of social inclusiveness, it reaches a high risk (77.5%). Indicators of social inclusiveness in the digital environment are indicative of a high-risk situation as Internet users are regularly exposed to aggressive communication. Individual cases show that members of various minorities, women and journalists are the main victims of attacks in the digital environment.

Although **media literacy** is often understood in Latvia as a digital skill, users lack the knowledge to protect themselves from attack, violence and fraud in the digital environment, especially on social media.

The level of digital literacy of the population is low: Eurostat data show that 43% of the population in Latvia have basic digital skills, 42% has low digital skills. This situation can be explained by the structure of media literacy activities in a country. The media literacy, including digital literacy, education is available to teachers, librarians, pupils, students, but there are not enough activities addressed to the other groups in society (seniors, low-educated people). This situation creates additional difficulties for people who intend to change their professional field in order to adapt to technology development-driven changes in the labor market. At the same time, it must be acknowledged that public institutions offer digital skills courses for the unemployed people on regular basis.

The Latvian education reform project "Skola2030" [School 2030] envisages that media literacy is mainly applied to digital skills. These skills similarly to critical thinking skills belong to the group of the cross-cutting skills. The project envisages the following: "Digital skills are skills that help to use digital technologies effectively, smartly and responsibly. The student uses digital technologies responsibly in everyday life to acquire, use and create knowledge, solve problems, share and use his / her own and others' created content, skillfully manage his / her digital identity, communicate effectively and securely with others in the digital environment; critically and constructively evaluates the role of technology and media in society" (Skola2030, 2020). The School2030 program lacks content dedicated to the understanding of the media's role in society, media culture, journalistic profession and other important issues. This means that digital literacy skills are primarily valued as skills in the use of digital devices and services, with less emphasis on the use of content in the online environment. In the same time in Latvia, the Safer Internet Centre is actively involved in the development of digital literacy, social campaigns are organized to pay attention to security and protection of personal data, as well as to ensure privacy and dignity in the online environment.

Disinformation in Latvia is spread mainly in the digital environment: on social media and digital media sites, which are purposefully created for disseminating disinformation (Bērziņa et al., 2020; Dzērve & Žukova, 2021). The public's resilience to disinformation is moderate, more than half of the population believes that they are able to recognize misinformation (Latvijas Fakti, 2020). However, Internet users are inactive when faced with disinformation on social media (Rožukalne et al., 2020).

Similar to the other countries, COVID-19 disinformation content in Latvia included a denial of the danger of the virus, anti-scientific recommendations to prevent the disease, calls for non-compliance with epidemiological advice, and globally widespread conspiracy theories. Already at an early stage of the pandemic, in March 2020, the public service media in Latvia warned about the spread of COVID-19 disinformation (Bojārs 2020). Public service media and independent fact-checking initiatives regularly

investigate various unverified statements (Melu detektors 2020-2; RE:Check 2020-21), despite verbal abuse and threats from COVID-19-denying groups (LETA/Delfi 2020).

Exploring the respondents' reactions to disinformation on social media about COVID-19, national representative (1013 respondents) survey (RSU/SKDS, 2020) data shows that more than half (54%) of the respondents have encountered misleading information, yet the proportion of respondents who cannot assess it (one in five) or have not encountered it (one in four) is significant. The average in the answer distribution is 3.24, which suggests that at least once a month each resident of Latvia encounters disinformation. More frequently than others, daily encounters with disinformation were indicated by people aged 45-54 (17%), people with low income (16%), and Riga district residents (19%). Disinformation is encountered at least once a week by men (19%), people with higher education (20%), employees of the private sector (22%), entrepreneurs (25%), and people with mid-level income (21%). Those respondents whose life was altered by the pandemic (25%) and who see their risk of COVID-19 as high and realistic (26%; 36%; respectively) indicated that they see disinformation daily or weekly. People aged 64-75 (9%), Latvia's non-citizens (10%), and the retired (8%) acknowledge seeing disinformation less frequently. These groups include a higher number of people who do not use social networking services (SNS) that have been the major platform for the dissemination of false information during the pandemic in Latvia. Researchers discovered that one third (33%) of respondents when encountered disinformation did not do anything, 19% do not use SNS, and 17% have not encountered disinformation. The group that does not react to disinformation on SNS comprises mostly people aged 25-34 (43%). Only 10% said they consider also sources they do not agree with. This group includes people aged 25-34 (14%), managers (15%), and those whose lives were significantly altered by the pandemic (28%). These groups were more likely to check the sources' credibility: people aged 25-34 (21%), employed in the public sector (18%), specialists (18%), people whose lives were moderately or significantly altered by the pandemic (27%), and those who are rather and very concerned about their COVID-19 risk.

However, the regulation that aim countering of disinformation in Latvia must be considered underdeveloped because there is no specific regulation on these issues. There is well developed universal legal framework, but there is no specific regulation aimed at **online hate speech**. Still, there are many barriers. e.g., long investigation process, long court hearing processes that make complicated countering online hate speech in Latvia. Preventing of disinformation uses general rules relating to hate speech and defamation, or disruption of public order and public institutions (Criminal law, Section 231^[11]). In some cases, where disinformation relates to goods and services, Consumer law is used. There are many programs devoted to tackle disinformation in Latvia, for instance, media literacy, fact checking and news deconstruction categories of Media Support Foundation.

State support provided to media organisations during COVID-19 crisis was almost exclusively (except payments for press delivery or payments of broadcasting licences) devoted to high quality information development, and tackling disinformation.

During the pandemic, hate speech and threats in the online environment were directed mainly at doctors, experts and journalists. Police have launched few criminal cases involving publicly discussed cases of social media users verbally attacking doctors advocating for the use of masks in schools, vaccinations, scientific evidence-based information about the pandemic and other issues.

Discussing equal opportunities and transparency of **political advertising in online media** during electoral campaign the updated Law on Pre-election Campaign should be mentioned. The regulation applies to clear declaration of financial part of online political advertising before election. During pre-election period (three months before elections) Bureau of Prevention and Combating of Corruption is responsible body to collect

the all data and to monitor election spending related data. Political parties have to declare their pre-election spending to Bureau of Preventing and Combating of Corruption.

However, some of the pre-election campaign funding used in the online environment is difficult to trace, as politicians actively create communication activities using their individual social media accounts or by forming closed support groups on social media, or even converting interest group's accounts into political campaign accounts. Researchers of online political campaigns lack information on digital communication techniques used by political parties in Latvia.

As the digital media environment in Latvia is dominated by a few companies, the risk of **Market Plurality** is high (71%). This is due to the increasing concentration in the digital environment and the lack of data on news media market data. Only data on the Internet media users are available in Latvia.

Protection of fundamental rights in the digital media environment makes up 30% of risk evaluation. In terms of **Political Independence**, the risk indicator is low (12%) because there is no presence of politicians among the largest digital media owners.

However, growing competition has increased **concentration in the online media market** and reduced the share of national media owners. Currently, the largest news media are owned by two Estonian media corporations: Eesti Ekspress and Postimees Group. The Internet media advertising market is stable, accounting for a 24% share of the entire Latvian advertising market in 2020.

5. Conclusions

Some of the recommendations for improving the media environment and media pluralism proposed in the previous report apply to this report as well. At the same time, as new problems emerged in the conditions of the pandemic, this report also suggests some new recommendations.

Since 2017, three new media laws have been drafted in Latvia. The general Press and Media Law, as well as the new Electronic Media Law, have so far not been a subject to the parliamentary debate. The Parliament of Latvia approved only the new Law on Public Service Media (PSM) and its Governance in 2020. However, the brand new PSM law does not bring changes in the PSM funding scheme. The PSM will continue to be funded annually from the state budget, which is decided by parliamentarians. Thus, the existence of the PSM will continue to depend on the decision of politicians in making the state budget.

Since 2016, the institution that is responsible for the development and implementation of media policy is the Unit of Media Policy at the Ministry of Culture of Latvia. The Latvian media system has been positively influenced by the development of media policy. In 2020, the first stage of Latvia's media policy ended, and the Media Policy Division of the Ministry of Culture began to develop new media policy guidelines. However, these were not completed during 2020. Within four years, the Media Support Foundation has been established to offer financial support to professional media. The number of media literacy activities has been increased through various projects. With the help of the fund, commercial media received regular support for the creation of quality content. Separate programs were established to develop investigative journalism projects, support the regional media, diaspora media and media content for disabled persons.

Although Latvia generally enjoys the protection of media competition, however, there are small country-specific media market conditions. Therefore, in order to preserve media diversity, efforts should be made to limit the influence of international media organizations on the Latvian media environment. In the field of media market condition pluralism, the situation has worsened. This means that the concentration of digital media has increased, and traditional media businesses are being undermined by the activities of global digital platforms.

In Latvia, the institution responsible for media policy development and implementation is the Media Policy Unit of the Ministry of Culture. The National Electronic Mass Media Council also participates in the development of audio-visual media development strategies and laws. This means that most of the recommendations below apply to both institutions mentioned. However, the main problem is the long process of adopting the new media regulation documents, for which the parliamentary Committee on Human Rights and Public Affairs is responsible.

By analyzing different risks to media pluralism, the following policy recommendations have been developed.

Recommendations for Fundamental Protection

- In order to improve the level of media accountability and understanding of media's role in democracy, it is necessary to adopt a law on the media environment, which will be adapted to the realities of the modern media environment and will clearly define the media and journalist's status. In addition, the new law shall emphasise the principles of professional ethics for media organisations.
- Supporting the activities of commercial media from the Media Support Fund, it turned out that in 2020 taxpayers' funds are also allocated to the media that disseminate disinformation. In order to strengthen the independence and responsibility of the media, the draft law on the regulation of the media environment should be adopted, clearly defining the advantages and responsibilities of professional media, thus clearly separating the possibilities of hybrid media to use state support allocated for professional media activities.
- In the new media regulation, it is essential to identify the distinction between rights and obligations between professional digital media and other information providers in the digital environment. At the

- same time, media and journalists must be protected from attacks in the digital environment in a more effective way.
- The new Latvian media policy plan should clearly identify regulatory and self-regulatory measures to prevent misinformation, as support for fact-checking organisations and professional media to take measures to reduce the spread of misinformation.
- The new media policy plan should include guidelines on how media literacy and media education will be offered to groups outside the formal education system.

Recommendations on Market Plurality

- Latvia's new media policy plan should include measures (such as the introduction of a digital tax for global platforms) that would ensure equal competition in the media market, preventing the impact of global platforms on the national media market.
- The regulation of media ownership transparency should be changed by obligation for all media companies to publish their ownership structures on their websites or in the records that are accessible to the public without payment.
- Media law in Latvia does not define the status of online media. As well as, the understanding of other media in existing regulation documents does not comply with the contemporary media landscape. The precise definition and obligation to follow general media regulations, including transparency of ownership and establishment of professional ethic code, should be included in the amendments to Law on Press and other Mass Media or in the new Mass Media Law that is under development.
- In order to prevent a high degree of horizontal and cross-media concentration in Latvia, specific thresholds and other limitations should be developed by Media Policy Unit of Ministry of Culture;
- The regulatory safeguards, including self-regulatory instruments, which seek to ensure that decisions
 regarding appointments and dismissals of editors in chief are not influenced by commercial interests of
 media owners should be introduced in Latvia by new media regulation law (whis is under development
 since 2016).

Recommendations on Political Independence

- The legislation that provides fair and transparent rules on the distribution of state advertising to media outlets should be created in Latvia.
- In order to decrease the level of political parallelism in Latvia's media system, specific limits for political parties to establish media outlets should be developed.
- The inadequate and short-term based funding creates serious risks of the possibility to politically manipulate PSM. Therefore, the funding system of PSM should be changed by using the share of particular taxes incomes or the other sustainable model for PSM funding, for instance, the share of GDP.

Recommendations on Social Inclusiveness

 A clear and well-established media and information literacy policy for different groups of society, including programs of lifelong learning for all generations and extended to all regions, should be elaborated in Latvia;

- As the Latvian population has generally low digital skills, state and municipal institutions need to develop programs that improve digital skills for people with low levels of education, seniors, the unemployed and other population groups, which are not accesible by activities provided of the formal education system.
- The funding for content preparation for people with disabilities in PSM should be increased, specifically, by elaboration of broader service of "easy language" programs;
- Precise rules that provide access to commercial audio-visual media content for people with disabilities should be elaborated for commercial media market players;
- The PSM organisations should develop a clear and comprehensive gender equality policy that covers both personnel issues and programming content;
- PSM have to develop the programmes and interactive content of media and information literacy, including media critics and media analysis.
- Overall, the access of minorities in Latvia to media information is satisfactory. The only exception, according to the expert, is the representation of LGBT+ interests, which can be said to be practically invisible to mainstream media content and their interests. Just as Latvian public media should develop a gender equality policy, similar policies are needed to reflect the different minorities. A balanced representation of the various minorities (ethnic, political, regional, local, political, religious, gender, agebased etc.) would require a discussion on revising the editorial practice guidelines.

Recommendations on Digital Media Pluralism

- The Latvian digital media environment requires the introduction of mechanisms to protect current sources of digital media revenue and limit the impact of global digital platforms on the development of professional media in Latvia.
- Strengthening the sustainability of professional digital media requires the creation of the same support system as used by traditional media, such as a reduced value-added tax or support of distribution services.
- In the digital media environment, a clear and user-friendly system of regulation and self-regulation is needed to distinguish the rights and obligations of professional media and hybrid sites.
- In order to assess the equality and transparency of the pre-election communication, the Media Policy Unit of Ministry of Culture should establish a regulation that provides researchers with data on pre-election political digital communication in social media in Latvia.

6. Notes

- [1] Whistleblowing law 2018/210.2, https://likumi.lv/ta/en/en/id/302465
- [2] Law no. 54890/2014 (Competition Law), https://likumi.lv/ta/en/en/id/54890-competition-law
- [3] Law no. 5490/2015 (Commercial Law), https://likumi.lv/ta/en/en/id/5490-the-commercial-law
- [4] Electronic Mass Media Law. https://likumi.lv/ta/en/en/id/214039
- [5] Pre-election campaign law. https://likumi.lv/ta/en/en/id/253543-pre-election-campaign-law
- [6] Criminal Law, https://likumi.lv/ta/id/88966-kriminallikums
- The Constitution of the Republic of Latvia of 1922, https://likumi.lv/ta/en/en/id/57980
- [8] https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=isoc_sk_dskl_i&lang=en
- [9] https://skola2030.lv/lv/macibu-saturs/merki-skolenam/caurviju-prasmes
- [10] https://drossinternets.lv
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Annexe I. Country Team

First name	Last name	Position	Institution	MPM2021 CT Leader
Anda	Rozukalne F		Riga Stradins University	X

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 reflects 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
Andris	Kenins	Director	Latvian Broadcasting Media Association
Aurelija	Druviete	Council member	National Electronic Media Council
Guntars	Klavinskis	Chair of the Board	Association of Latvian Press Publishers
Janis	Buholcs	associate professor	Vidzeme University of Applied Sciences

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