MONITORING MEDIA PLURALISM IN THE DIGITAL ERA


Country report: Lithuania

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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 Lithuania the CMPF partnered with Aukse Balcytiene, Kristina Juraite and Ignas Kalpokas (Vytautas Magnus University), Deimantas Jastramskis (Vilnius 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 Plurity, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

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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**: Lithuania (territory 65 300 km²) is situated on the South-Eastern coast of the Baltic Sea. It is bordered by Latvia to the North, Belarus to the East and South, Poland to the South, and Kaliningrad Oblast (a Russian territory) to the Southwest. At the beginning of 2020, the population of Lithuania was 2,79 million. Since the Independence in 1990, the population has steadily declined and Lithuania has lost almost a quarter of its population due to emigration and a negative natural growth rate.

- **Minorities and languages**: Lithuania is an ethnically homogeneous country, with Polish and Russian-speaking being the biggest minorities (6.6% and 5.8% respectively of the total population). Most of Lithuania’s population resides in cities. The official language of the country is Lithuanian.

- **Economic situation**: Lithuania joined the Eurozone in 2015. In 2019, the gross domestic product (GDP) per capita was 80% of the EU average. As a result of the COVID-19 pandemic, the GDP shrank by 0.8% in 2020, to 48,8 billion Euros (Lietuvos ekonomikos apžvalga, 2021). The services sector has suffered the most. The pandemic has significantly worsened the labour market situation. The unemployment rate in 2020 accounted for 8.5% (Lietuvos ekonomikos apžvalga, 2021). The pandemic and the "economic closure" have had a particularly negative impact on youth employment: the unemployment rate among the population of ages 19-24 reached 19.6% (and almost doubled for this age group over the year from 11.9% in 2019).

- **Political situation**: Lithuanian politics is characterized by polarized pluralism. The range of political parties is quite wide, with the ideology of the centre, characteristic of most political forces. The last Parliamentary elections of October 2020 saw a significant generational change - both in terms of the age of the politicians, gender representation, and the declared political program provisions towards greater social inclusiveness. During the pandemic, this difference only intensifies as new topics emerge in which opinions can be divided. However, the standings of politicians do not differ radically on issues of key significance (for example, those in relation to quarantine restrictions) that require a quick response.

- **Regulatory environment**: Media ownership concentration is high. This high concentration is due to the fact that media regulation does not pose restrictions on cross-media ownership. There is no media-specific definition of concentration. In addition, close integration of politics and business interests also has a direct impact on media’s institutional standing as well as professional functioning. These factors ultimately affect pluralism, inclusiveness, and social cohesion in the country. Lithuanian media operates in economically unsteady conditions that are determined by the growing uncertainty related to the COVID-19 pandemic, changes in the global economy, and the persisting presence of political corruption with the ‘grey zones’ economy. Ongoing conglomeration is observed in all media sectors, but financially the biggest loser in this trend is the newspaper’s industry.

- **Media market**: The media are strongly concentrated in large cities, especially in the capital Vilnius. Regional media tend to be marginalized. The marginalization of regional media impacts the working conditions and professionalization of journalists (e.g. incomes, professional freedom and independence, professional motivation and ambitions of journalists and editors). One notable exception within these trends is the presence of media start-ups financed through crowd-funding actions. Though all media industries do not constrain their activities to conventional news channels and heavily invest in various content integrating actions, two media sectors remain the strongest – that of TV and that of...
Internet-based communications. Digitalization and increased levels of disinformation and the spread of pandemic fake news, attacks on journalists, changed psychological situation in editorial offices add another stress on newsrooms and general working conditions of journalists. In 2020, the advertising market had decreased from 119.5 to 105 million Euro. TV advertising represents (43.8%), while Internet advertising accounts for 19.2%. Losses in the advertising market impacted quite heavily on media businesses and accelerated the structural decline in some media sectors such as regional media and newspapers.

**COVID-19:** The current infodemic has increased the need for quality fact-checked news. Although social networks have started monitoring content, these actions are not enough to stop the coronavirus infodemic. Media groups (Delfi.lt, 15min.lt) and citizen initiatives have started playing an important role in regular and coordinated actions geared at disinformation debunking. The demand for professional journalism and skills for fact-checking, media literacy, data analysis and data reporting has become of primary significance in all news media.
3. Results from the data collection: assessment of the risks to media pluralism

Lithuania: Media Pluralism Risk Areas

Lithuania scores low risk in Fundamental Protection (28%), medium risk in Political Independence (34%) and Social Inclusiveness (43%), and high risk in Market Plurality (70%) area. Some of the persisting issues are political and business influence, lack of media ownership transparency, continuing audience fragmentation and social and political polarisation, declining overall institutional trust, and rising societal uncertainty and skepticism (Balčytienė and Juraitė, in press).

In the area of **Fundamental Protection**, the indicator on the Independence and Effectiveness of the Media Authority has remained consistently low-risk (8% in the MPM2021 and 10% in the MPM2020). The existing legal environment and the political situation of the last few years have developed in such a way that even emerging cases of spontaneous potential political pressure has not been realised in practice (Kõuts-Klemm, Rožukalne, and Jastramskis, in press). On the contrary, the indicator concerning the Journalistic profession, standards, and protection scores a medium risk and is increasingly a matter of concern. The pandemic period has highlighted the weakness of the existing framework to ensure journalists’ safety, and risks to the journalistic profession significantly increased from low-risk (9%) to medium-risk (40%) assessments. Key points here are the lack of effectiveness of professional associations, particularly their inability to stand up to the interests of the profession. There is also a high risk in terms of remuneration and job security, due to economic challenges caused by the pandemic, but also to structural issues in the media sector. Journalists benefit from limited social protection, which has also become a serious issue in light of pandemic-related economic challenges. Journalists are also exposed to online attacks initiated by both local actors and foreign states.

The **Market Plurality** area scores a high risk (70%), while scored a medium risk in the previous edition of the MPM. The risk for this indicator has steadily augmented over the past years (observable not only in Lithuania but also in other Baltic countries). Four out of five indicators in this area are at high risk: News media concentration (77%), Online platforms concentration and competition enforcement (79%), Media viability (67%), and Commercial and owner influence over editorial content (70%). In all these indicators the risk score worsened in comparison with 2020. For example, Media viability shifted from medium to high risk, due to the COVID-19 impact on the sustainability of the media industry, which suffered losses in advertising.
revenues. However, the recent extraordinary economic circumstances are not the only drivers of the growing risks. Some deeper features of the Lithuanian media environment explain this increased risk. Political and business parallelism has long been named a typical characteristic of the Lithuanian political culture (Balčytienė, 2012; Lašas, 2017), and this is reflected in the actual relations between the media and politics (Balčytienė and Malling, 2019) as well as in the policy-making process (Jastramskis, 2016; 2019). Media businesses and lobbying groups are among the most active players having significant pressure on the media policy process in the country. As a result, ongoing media ownership concentration and lack of practical measures to support editorial autonomy are a few most evident outcomes of such a reality, as well as the enduring risks in Transparency of media ownership (Balčytienė, 2012; Jastramskis, 2019). In recent years, despite the efforts to streamline the media data registration system, Transparency media ownership remains a medium risk (56%), which also results in heightened risk assessments in editorial autonomy. In Lithuania, the law does not provide regulatory safeguards to guarantee editorial autonomy, and media self-regulatory measures often are not implemented effectively.

3.1. Fundamental Protection (28% - 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.

![Lithuania: Fundamental Protection](image)

Overall, Lithuania enjoys a generally favourable journalism environment in terms of Fundamental Protection. Three out of five indicators are classified as low-risk, and none are classified as high-risk. In particular, the independence and effectiveness of the media authority have to be stressed as a particularly low-risk indicator (8%).

In terms of Protection of Freedom of Expression, the risk is identified as low (25%). There has been limited change in comparison with the previous year (21% in 2020). Freedom of expression is enshrined in both the Constitution and ordinary laws. Likewise, the European Convention on Human Rights and the
International Covenant on Civil and Political Rights are implemented without reservations. Some of the risks involve a relatively loose definition of threats to national security such as, for example, broadcasting rights can be suspended if an outlet is deemed to pose such a threat. There were also several instances of violations of access to information and publicity rights, whereby journalists critical of the previous government had to defend their rights in court. Although, there are sporadic incidents of infringing freedom of expression by some political actors. However, these are isolated incidents and not a systematic issue. There is no clear evidence of arbitrariness in the way news outlets and other information providers are treated.

Similarly, there has been very little change in terms of Protection of the Right to Information – which remained low risk, changing from 25% to 29%. Right to information is strongly enshrined in law, and generally, access to it is provided in accordance with established procedures. However, there are also outlier cases, such as restrictions to journalists accessing state register data introduced by the previous government or a case when a recording of a cabinet meeting was deliberately and, as deemed by the court, unlawfully destroyed. There is also a lack of uniformity in court practice pertaining to the defense of the right to information. Besides, whistleblower protection is a matter of concern – even though such protection exists, the number of reports remains low, and the state’s efforts to instil confidence in provided protection mechanisms are practically non-existent.

A matter of concern is the Journalistic Profession, Standards and Protection, which has moved from low-risk (9%) to medium-risk (40%), due to the impact of the COVID-19 pandemic. Key points here are the lack of effectiveness of professional associations, particularly their inability to stand up for the interests of the profession in the pandemic context. There is also high risk in terms of remuneration and job security, particularly due to economic challenges caused by the pandemic but also to structural issues in the media sector. Journalists also benefit from only limited social protection, which has also become a major issue in light of pandemic-related economic challenges. There have also been online attacks against journalists, initiated by both local actors and foreign states.

The level of Independence and Effectiveness of the Media Authority has remained consistently low-risk at 8% (previously 10%). This indicator is mainly related to the activities of the Radio and Television Commission. The legal environment acts as a safeguard against direct political or lobbying pressure in this area, and thus, the risk assessment has been stable for several years. Other potential reasons for such a good performance of the Media Authority (the Radio and Television Commission) include the procedure for appointing members of the Radio and Television Commission whereby they are delegated by a diverse mix of organisations and different branches of government, meaning that it is difficult to hijack the agenda. There have, as yet, not been clear signs of political meddling or attempts by the government to overrule the Commission’s decisions. Funding is transparent and objectively set, thereby precluding it from being used as leverage. There is also a clear and effective judicial appeal procedure. Finally, the existing legal environment and the political situation of the last few years have evolved in such a way that even emerging cases of spontaneously arising and potential political pressures have not been realised.

One encouraging trend has been an improvement in the Universal Reach of Traditional Media and Access to the Internet (risk reduction from 58% to 40%). There is good public service media (PSM) coverage while net neutrality is ensured, and internet service providers (ISPs) generally act in a transparent fashion in terms of content. There has been growth in Internet access (and, particularly, the intensity of use due to the pandemic lockdowns), but penetration, particularly of broadband, remains below the EU average and continues to be a point of concern. Also, it is worth noting that public libraries that provide free Internet
access and technology training at their premises remained closed during much of the pandemic.

3.2. Market Plurality (70% - 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 score has shifted to the high level risk, with an increase from 62% (MPM2020) to 70%. The main drivers of the risks in this area come from the assessment of the two indicators on market concentration (news media and online platforms), from businesses influence over editorial content and from threats to the economic sustainability of media sector, which worsened a pre-existing tendency to a reduction in market diversity.

Transparency of media ownership is the only category among other Media Plurality area indicators assessed as the medium level risk of 56%. This is the only indicator with a slightly lower risk level than in previous assessment; nonetheless, the progress in terms of legal safeguards and policy measures to disclose media ownership to the designated authorities (according to the main media law) and provide more transparency on the media owners has been limited and not fully effective. Though new regulatory measures have been put in place, including a new media register VIRSIS which is still under development, as well as a few non-governmental initiatives to monitor media ownership (e.g., Transparency International Lithuania, Media4Change), only a few leading news media declare their ownership information on their own websites - similarly, only a few of them declare their editorial policies, including PSM group, business daily, few minority and community media. Briefly, issues of media transparency and accountability are defined as...
persistent problems in Lithuanian media policy and media performance (Balčytienė, 2012; Lašas, 2017; Jastramskis, 2019).

The risk level for News media concentration is assessed as high as 77%. News media ownership in Lithuania remains highly concentrated, with a small number of companies owning the majority of news media outlets across different sectors. There are no sector-specific legal acts that would restrict the ownership concentration in the Lithuanian media sector, including cross-media ownership concentration. The lack of provisions over the ‘dominant position’ in the media market or obligations to disclose media ownership on a yearly basis, affect the enforcement of adequate and healthy competition in the news media market.

A high level of risk of 79% is also generated by the Online platforms concentration and competition enforcement in Lithuania. The overall tendency of news media concentration appears indeed challenging. The recent pandemic has also significantly affected the news media concentration and competition.

The most critical change was observed in case of the Media viability indicator, which has significantly increased from a medium level (36%) to a high-level risk (67%). This is mainly due to the economic challenges and constraints that hit the media industry during the global pandemic. The national news media market has suffered from a dramatic decline in their revenues and advertising: the local and regional news media, as well as print media, have suffered the most. In 2020, the advertising market in Lithuania declined by 12.5% or 15 million euros, and was at 105 million euros (KANTAR, 2021). According to recent academic studies, over 50% of journalists in Lithuania are working as freelancers with restricted social guarantees, i.e., they are eligible to limited social security benefits (Jastramskis, 2019). Work without labor agreement is most spread in the television industry. No significant public subsidies have been provided to reduce the economic risks and financial losses during the pandemic. National and regional media are eligible for state support distributed by the Press, Radio, and Television Support Foundation. However, this kind of support, which is 2.7 million euros per year, has not changed for years. As a result of the pandemic, media diversity (and, consequently, pluralism) in Lithuania has been significantly affected (BMHC, 2020).

The tensions between the public service broadcaster the Lithuanian National Radio and Television (LRT) and commercial media have been growing since 2015 when a new LRT funding scheme was introduced. The new model to ban advertising on the LRT resulted in a very rapid annual surge in the LRT revenue, which is well above the loss of advertising revenue. In 2020, the revenue of LRT from the state budget increased by 11.3% compared to 2019. Despite the ban of advertising, the LRT continues to broadcast commercials in the form of sponsorships. Such a situation has fueled friction with the commercial media, which live on advertising revenue and have to compete in different market conditions. In June 2020, the Lithuanian Internet Media Association filed a complaint with the European Commission claiming that the fully budget-funded public broadcaster LRT is distorting fair competition in the media market. The commercial media are arguing that LRT creates unnecessary competition online and its activities exceed the public mission to be performed under the law covering public service media.

The indicator of Commercial and owner influence over editorial content scored a high risk (70%). The structural features that lead to the high concentration and the weakness of the economic sustainability of the news media companies may contribute to rising the influence of businesses interest on the editorial choices. Although regulatory and self-regulatory instruments do protect editorial autonomy, violations related to sponsored content, product placement, content marketing were reported by the journalists and experts. Research studies show that there is a lack of editorial autonomy, transparency, and impartiality in
Lithuanian newsrooms due to strong financial pressures and clientelistic relations between the media, the economic sector, and the political field (Juknevičiūtė et al. 2020; Jastramskis, 2019; Lašas, 2017). Regional and local media outlets are even more susceptible to local political and business influences (Jastramskis et al., 2017; Jastramskis, 2015).

To support Market Plurality, stronger institutional supervision of largely media business-related issues (as well as raising public awareness and interest in media business-related matters), and transparency of media ownership are necessary. In most cases, the legal framework is already in place. However, their enactment and implementation are generally missing. All things considered, healthy media competition in Lithuania is missing and is not adequately supported through institutional instruments or through market competition regulation.

3.3. Political Independence (34% - 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.

Compared to the MPM 2020, the level of risk for the indicator Political Independence of media has decreased, although it is still in the medium risk area (54%). It was mainly due to the strengthening of the PSM independence and its growing influence in the media system. The assessment of the independence of private media shows that the local (municipal) media is dependent on politicians: both in terms of ownership and financial relations (Jastramskis, 2015). The inter-dependence of politics/business and the media has not yet been resolved (Lašas, 2017). Indeed, the dependence of large national media groups on policy actors is somewhat lower, especially in the radio, online media sectors and news agencies. Still, this...
indicates a medium risk for the indicator on Political independence of media, which is closer to a high-risk than to low-risk.

**Editorial autonomy** is at high risk (71%). The law does not provide regulatory safeguards to guarantee editorial autonomy, and self-regulatory measures often are not implemented effectively. Only a few media organizations show an editorial autonomy from political and business interests.

The PSM, mainstream private audio-visual media, and content on online platforms contribute to a diversity in political coverage. The PSM provides equal time and opportunities to the participants of political campaigns. Most of the private media organizations provide equal conditions for all political forces during election campaigns also. The lack of transparency of the media during political election campaigns is revealed in rare cases where content published as journalistic is recognized as advertising. In general, it can be stated that there is an availability of plural political information, in particular during electoral periods. It results in a low-risk score (17%) of the indicator on *Audio-visual media, online platforms and elections*.

The indicator on **State regulation of resources and support to the media sector** shows low risk (25%). It is mainly because the direct (media support received through allocations from the state budget) and indirect state subsidies (VAT exemptions) are distributed to media outlets fairly and transparently. However, the legislation does not provide rules for the advertising of state institutions in the media. State advertising is not a subsidy nor can it be called support for independent media. It is the purchase from the media of an information service specifying what content is to be published. Therefore, the distribution of state advertising to media organizations is not always fair and transparent: and, again, this is a recurring problem in the Lithuanian news media (Nevinskaitė, 2009; Jastramskis, 2015).

The indicator on **Independence of PSM governance and funding** scores the lowest risk within the section (3%). The funding model of the PSM enables financial independence from the political institutions. It was confirmed by the Constitutional Court also. The independence of PSM governance is formally guaranteed by the procedure of formation of the PSM council.

### 3.4. Social Inclusiveness (43% - 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 situation in the area of Social Inclusiveness remains largely unchanged in comparison with the previous edition of the MPM. Recurring problems with regard to the Access to media for minorities (50%), and the Access to media for local/regional communities (56%) places Lithuania in the medium risk band for these two indicators. Although on the legal level, regulatory instruments are in place, they are not enough to ensure equal opportunities for all in relation to media.

Regarding Access to media for minorities (risk of 50%), the main media law No. I-1571 does specify in Article 5, Section 8 that minorities have access to airtime on PSM channels (both TV and radio, as well as on the online news portal Lrt.lt). However, such policy does not directly apply to other types of media in the country, such as commercial outlets. Hence, there is a clear difference between the activities undertaken by PSM and those pursued by commercial media groups regarding programs for minorities. Only a few of the biggest online news portals and some regional radio channels have news editions in the Russian language. It is also important to highlight that minority issues in politics and policies are highly polarized in Lithuania. The issue of the rights of national minorities has long been politicized, although this contrasts quite strongly with the relatively small number of national minorities. International organisations (EFHR) have listed recommendations and calls for a review of the regulations of the competition for state subsidies to media outlets adding a separate line for the financing of media projects for national minorities.

A similar situation is observed in the case of Access to media for local and regional communities, as well as for community media. The risk has increased from 50% to 56% in comparison with the previous edition of the MPM. This is due to the fact that there are no media-related legal mechanisms for equal opportunities to access media for local and/or regional communities and for community media. In general, the independence of regional media remains a thorny issue in Lithuania. First, many local/regional media still rely on local political/business interests, which corrupts the funding schemes and media independence (Jastramskis, 2015). Also, the recurring problems such as securing independent funding and financial support for the media in the regions, are aggravated by the growing demand for digital professionalism.

An improvement could be observed regarding the indicator measuring the Access to media for women. The risk score has switched from medium in the MPM 2020 (38%) to low (33%). In Lithuania, a significant number of top media management positions (directors-general, chief editors) are held by women. Although
there is no direct and explicit media-related policy on gender equality, the PSM has issued a decision to strategically observe the equal representation of genders in its programs.

The **Media literacy** indicator has remained medium risk (42%). There is still a lack of inter-institutional coordination in media and information literacy (MIL) policy. In Lithuania, different institutions and stakeholder groups emphasize different frames focused on inclusion, accessibility, lifelong learning, resilience, and national security, which results in different approaches of media literacy actions, MIL promotion, and development (Kundrotaitė and Beinoriūtė, 2020; Juraitė and Balčytienė, in press). However, during the pandemic period, new approaches to MIL were adopted to focus on public empowerment-oriented actions (Juraitė and Balčytienė, in press). The abundance of information and increasing demand for trusted news sources in relation to COVID-19 (quarantine restrictions, personal safety, vaccination, etc.), has also proved that a more integrated and comprehensive approach is needed for the development of greater media awareness and public resilience to fake news and disinformation.

The indicator on **Protection against illegal and harmful speech** scored a medium risk (35%). Lithuania was among the first EU member states to launch measures against disinformation at the national level. The Amendment No XIII-2088 of the Law on Public Information adopted by the National Parliament on 26 July 2019 allows suspending the broadcasting of TV channels by a court decision for the incitement of hatred or dissemination of disinformation (Article 19). Media groups are taking steps to combat disinformation by raising general media awareness. News portal Delfi, in cooperation with Google, launched an artificial intelligence-based website Demaskuok.eu to tackle fake news. The Lithuanian elves are also fighting lies on social networks. Local journalists contribute to raising public knowledge by hosting various meetings in larger cities and regions where they discuss with people the threats posed by fake news. Still, there is a need for a broader framework. As most efforts directed against misinformation/disinformation are typically most concerned with Russia's political manipulation threat, COVID-19 disinformation and conspiracy theories have been mostly seen as a side issue.
4. Pluralism in the online environment: assessment of the risks

The risks to pluralism in the digital environment fall in the same area of risks as identified for conventional media. In Lithuania, Internet media outlets adhere to legislative rulings in the same manner as the general news media. The Law on Provision of the Information to the Public, which is the main media law in Lithuania, defines media very broadly. The definition covers conceptualizations of a book, a newspaper, a magazine, a bulletin or other publication, a television or radio program, a cinema or other audiovisual product, an information agency announcement, also a media product for online distribution. Hence, Internet media is considered as conventional news media that also obeys the Code of Ethics, i.e., the self-regulatory instrument. Analogous requirements apply in the area of digital ownership transparency. In the same manner, as for the ownership transparency in the traditional media sector, improvements are needed in this area, and one important amendment would be for all media owners to declare their interests.

There has been no systematic practice of violating Freedom of Expression over the past two years. According to the available regulation, the National Consumer Rights Protection Authority may oblige Internet service providers (ISPs) to block websites that do not resolve the violation of consumer rights within three days of the detected violation. Since May 2019, the media authority (RTCL) is authorized to block Internet websites that illegally publish copyrighted works. In the same manner, as in the cases of freedom of expression violations in the traditional means (print and broadcast media), appeal mechanisms also apply for appeals against the infringement of freedom of expression in online communications. The same regulatory authority is updating information on the websites, which illegally publish copyrighted content. This is a new function of RTCL, which has been added to its competences since April 2019. It has the right to issue binding instructions to ISPs to remove access to illegally published copyrighted content by blocking an Internet domain name that identifies a website on which such content was published until the copyrighted content is removed. The Connections Regulation Authority actively supervises the observance of net neutrality and enforces ISP transparency.
In relation to **digital safety**, a number of concrete safeguards were observed in 2020. Three major online news outlets – Delfi.lt, 15min.lt, and LRT.lt – invested heavily into professionalizing their activities towards more focused fact-checking and disinformation debunking, promotions of media literacy, and organization of critical media awareness campaigns to the general public. **The increase in LRT funding** in recent years has made it possible to provide adequate funding to the LRT news portal Lrt.lt. This allowed the LRT website to create a more competitive environment for the audience’s attention in the online media market (the LRT portal does not participate in the advertising market since July 2019). The LRT website has become one of the five main players in the news website market (Gemius Baltic, 2021). Also, the LRT has recently released an investigative report (October 2020) that the government of China for many years has been collecting data on the Lithuanian officials, politicians and their families, and journalists (LRT, 2020). There have been no official reports on the incidents or attacks against journalists, no harassment and abuse of female journalists. Still, this does not mean that there are no disruptions to the journalistic working process. Ongoing information attacks, disinformation campaigns, and other types of disruptions have become a reality in Lithuania in recent years (LŽC, 2018). Harassment attacks and trolling are met with insufficient efforts by relevant authorities to bring the perpetrators to justice, which leads to a culture of impunity and can fuel further threats and violence against media.

According to DESI (2020), the percentage of the population with **at least basic digital skills is 56%**, and above basic digital skills is 32%. Also, Lithuanians continue to lead the EU rankings of **online news consumption**. As shown in the Kantar Media Day study (2019), Lithuanians consume media content for about 7 hours a day, of which almost an hour is spent using multiple channels (multitasking). In 2020, Internet users spent 4 hours online (KANTAR, 2021). Social networks, generally, account for the lion's share of the time dedicated for spending on the Internet (37%); the other time is spent on such activities as video content consumption and Internet search (about 22% each), and news portals reach (19%). Coronavirus outbreak and the lockdown introduced in Spring 2020 significantly altered media use. Consumption of online news media increased by 50% while watching online videos and social networking increased by 38% and 37% respectively (BMHC, 2020).

Different media outlets have been facing **survival challenges** lately. These encourage them to look for alternative sources of revenue. As a result, different survival strategies have been applied, such as hidden advertising, project-based (sponsored) journalism, crowdfunding, grant writing. Though advertising requires making a clear distinction between the information presented and advertisement and, if not clearly identifiable, the mandatory inscription for information as "Advertisement" (Reklama), this requirement applied to all media, is often violated. Therefore, in 2019, the Consumer Rights Protection Authority started monitoring influencers for hidden advertising on social networks. The Agency may impose fines or make recommendations in case of violations of the law on Advertising. Also, new business models including different service providers for the third parties (organizing events, managing social media platforms for third parties, fact-checking activities, etc.) are practiced by some of the news media outlets. No official data are available on the revenues of digital news media in 2020. However, independent experts and representatives of the digital news media claim that there was a decline in revenues of up to 50% (these were most evident in the first weeks of the quarantine period), then the decline has stabilized). As a result of income changes during the pandemic, value-added tax for digital news media was proposed by the Government to be reduced from 21% to 5%, but no concrete action was taken.

The presence of **political control** over digital native media is very similar to that discussed in the case of newspapers at the local level. Some local Internet sites are controlled directly by politicians or their family...
members. The Central Electoral Commission has adopted a decision on the dissemination of political advertising during the political campaign, which sets out the requirements for marking political advertising on online platforms. The Central Electoral Commission approved the rules for monitoring the political advertising of the 2020 parliamentary elections, which included the monitoring of political advertising on online platforms as well. The State Data Protection Inspectorate has prepared recommendations on the processing of personal data during elections, but there is no data regarding monitoring the use of personal data on individuals by political parties for electoral campaigning purposes.

Studies and media freedom monitoring analyses have long shown that there is a lack of autonomy, transparency, and impartiality in the Lithuanian media newsrooms due to strong political and market pressures (Lašas, 2017). This trend may be less noticeable in bigger media groups and online media, but with digitalization, the media is facing new interferences. Combating cyberattacks, disinformation and fake narratives becomes a primary matter for all media professionals.

In recent years, there have been initiated various programs and analysis projects that apply media education and media literacy training approaches and perspectives to counteract disinformation and hate speech in both online and offline communications. Very often, these initiatives also go in line with a much broader frame of cybersecurity approach and projects on how to combat disinformation and misinformation campaigns online and offline. In the assessed period (2020-2021), a slight improvement in the Protection against online hate speech was registered (risk assessment went from Medium to Low). Although no clear reduction in the number of cases of online hate/harmful speech was recorded, there are positive effects of the taken measures in countering hate speech. In the report by the Inspector of Journalists’ Ethics (ŽEIT, 2021), it is stated that hate speech is “a phenomenon that has long reached the scale of a pandemic in Lithuania”. In 2020, the Inspector contacted social networks 1546 times reporting hate speech. Social networks have eliminated 98% of comments on illegal content that have been reported. The average response time to remove these hateful comments was 3 hours (ŽEIT, 2021).

Different activities and projects implemented by Lithuanian state institutions and NGOs suggest that the focus on hate crimes, including hate speech, has recently been stronger (HRMI, 2020). To increase effectiveness in responses to hate crimes and hate speech a number of actions were initiated in 2020. Among those are initiatives aiming at the improvement of the understanding and knowledge of competent authorities about the impact of hate crimes and hate speech; also, practical guidelines were prepared on how officials should communicate with vulnerable groups. A special workgroup was established by the Ministry of the Interior, which is aimed at increasing the effective response to hate crimes and hate speech in Lithuania. Specifically, the group not only seeks to raise awareness of hate crimes and hate speech cases, responsibility and accountability for such crimes. It also provides specific recommendations and makes appropriate proposals, and monitors the implementation of the international obligations of the Republic of Lithuania in the field of prevention of hate crimes and hate speech (HRMI, 2020). In 2020, the Prosecutor General of Lithuania approved the pre-trial investigation methodological recommendations on the characteristics of conducting, organizing, and leading investigations of hate crimes and hate speech. The new recommendations define hate crimes and explained the concepts in much greater depth than before. According to this legal act, hate speech is considered to be the public dissemination (by word of mouth, in writing or other form) of information (ideas, opinions, known incorrect facts) which is used to ridicule, express contempt for, urge hatred for, incite discrimination, incite violence or a physical violent treatment of a group of persons or a person belonging thereto on grounds of age, sex, sexual orientation, disability, race, nationality, language, descent, social status, religion, convictions or views. Hence, hate speech is not only based on verbal communication, but also includes video recordings, photos, and any...
other action or content. However, national legal acts do not yet include all grounds of discrimination, such as race, ethnicity, citizenship, and gender identity. The provisions of the revised EU’s Audiovisual Media Services Directive (AVMSD) related to video-sharing platforms are transposed in the Amendments to the Law on the Provision of Public Information, the Law on the Protection of Minors against the Detrimental Effect of Public Information and the Code of Administrative Offenses, all adopted by the national parliament in January 2021. The main media law included a more specific definition of the content inciting to violence and differentiated it from the other types of harmful information: *It shall be prohibited to publish in the media information if: <…> spreading or inciting hatred, bullying, contempt, inciting discrimination, violence, physically dealing with a group of people or a person belonging to it on the grounds of age, gender, sexual orientation, ethnicity, race, nationality, citizenship, language, origin, social status, disability, on the grounds of religion, belief, opinion or religion* (Article 19).
5. Conclusions

Generally, the Lithuanian media system seems fairly pluralistic, but certain issues require closer attention and informed analysis. Among identified risks, a number of tendencies have an enduring character, such as, for example, the proximity of political-business interests. Though freedom of speech and expression is adequately taken into account into the legislation, conditions for media pluralism and diversity in Lithuania are highly dependent on the size of the market as well as specificities of political-economic context and media culture.

The pandemic period opened and further strengthened the already weak points in the Lithuanian media system. The highest threats are indicated in media ownership concentration and editorial independence from (political-business) influences.

Policy recommendations in each of the analyzed areas:

- **Fundamental Protection:** In this area, the highest risks identified mostly relate to the impact of the COVID-19 pandemic, particularly in terms of digital safety and the viability of media outlets’ business models. Hence, practical measures to aid post-pandemic recovery should be considered.

- **Market Plurality:** Within this action, the system of indirect and direct subsidies needs to be reviewed. The current mechanisms to ensure media ownership transparency and media accountability must be improved. Media-specific regulation and safeguards to prevent media ownership concentration are needed.

- **Political Independence:** It is necessary to create a transparent legal mechanism for the distribution of state and municipal advertising/publicity money to the private media in order to eliminate the corrupt dependence of the media on politicians. It is important to maintain the current PSM funding model, which provides the basis for PSM’s political independence and stimulates the quality and diversity of media content.

- **Social Inclusiveness:** Media ‘social inclusiveness’ needs to be strengthened, increasing the media literacy competencies of different groups of citizens (women, people with disabilities, children and adolescents, elders, minority groups). More structured and coordinated efforts are required to focus on developing partnerships of academic, media, and civic groups for ‘news media resilience’ and ‘digital capacities’ (‘digital civics’) development in society during the pandemics and disinformation.

- **Digital Safety:** As found, though there are no official accounts about violence against media, harassment attacks and trolling in media are met with insufficient efforts by relevant authorities to bring the perpetrators to justice, which leads to a culture of impunity and can fuel further threats and violence against media.

To conclude, the issue of media diversity and pluralism appears among the top matters and concerns in public policies linked with digitalization and information accessibility, content production and quality assurance. Although clear strategic directions have been identified in media policy and approved by the Ministry of Culture in 2018 (ensuring diversity, financial support, strengthening regions, media rigidity), no real change has been observed. There was an attempt to change the model of media financial support, as well as to take greater leadership in the field of media literacy, but these strategic decisions had to be reconsidered in response to changes caused by the pandemic.
6. Notes


[2] Available at: https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/13fd4df178a711e99ceae2890faa4193?jfwid=-l1o1b4v9z


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Annexe I. Country Team

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<tr>
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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.

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