

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: Malta

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Research Project Report

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1. About the project

1.1. Overview of the Project

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

1.2. Methodological note

Authorship and review

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

In Malta the CMPF partnered with Louise Vassallo (University of Malta), 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

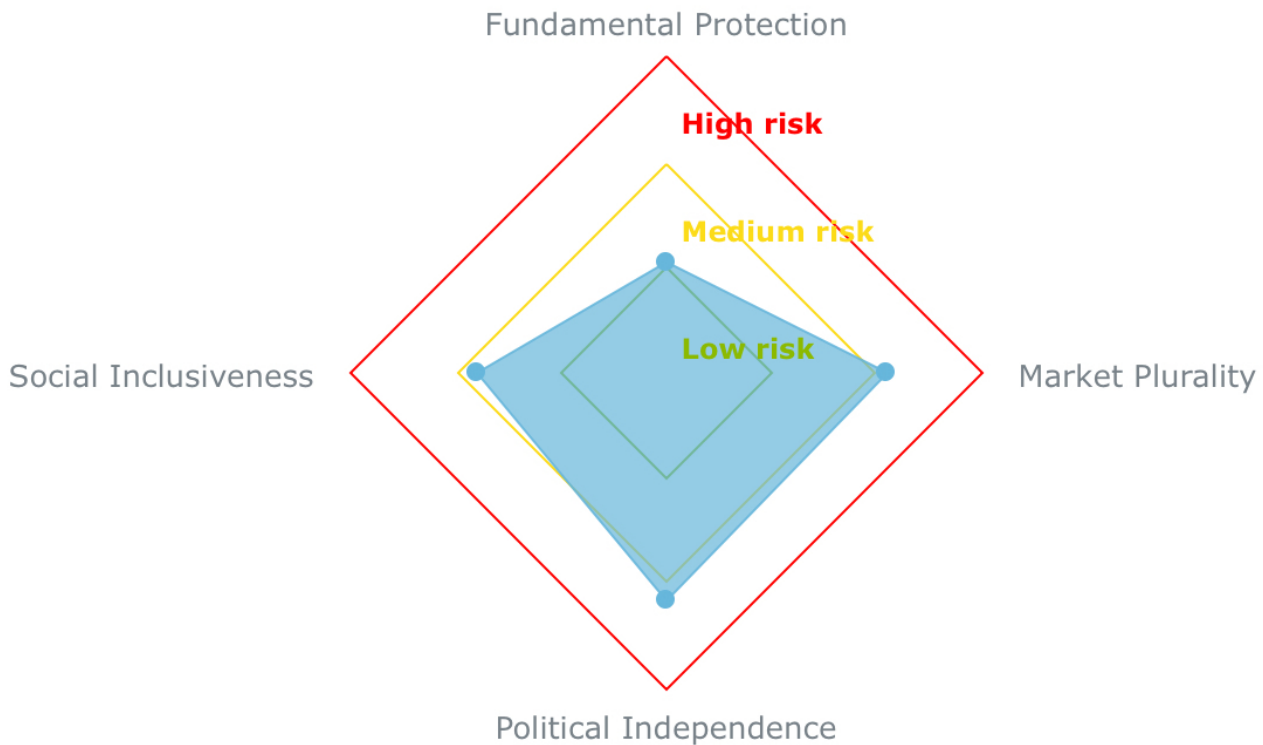
- **Population:** Malta is a Mediterranean island state situated between North Africa and Sicily. Malta, Gozo and Comino are the three largest islands that make up the archipelago, and are inhabited. Covering a landmass area of just 315 km², and with a total population of 514,564 (NSO, 2020), it is the smallest EU Member State.
- **Languages:** Maltese and English are the country's two official languages, with Maltese also being the national language. The island was a colony of the United Kingdom for 164 years, prior to obtaining independence in 1964, so the British legacy is strong.
- **Minorities:** There are no legally recognised minorities in Malta, but, in view of its geographical location, the country sees an influx of migrants, essentially asylum seekers, by sea. According to the 2020 AIDA country report, Malta had 4,021 asylum applicants in 2019, almost double the amount registered in 2018, with most of them being from Sudan (1,057), Syria (429) and Libya (258) (AIDA, 2020, p.7-8). Between 2014 and mid-2018, there were very few sea arrivals, following an informal agreement between Italy and Malta, which led to almost all those rescued in Maltese territorial waters and Malta's Search and Rescue Zone, disembarking in Italy, with only medical evacuations relocated to Malta (AIDA, 2020, p.19). This changed in 2018, and in 2019, sea arrivals totalled 3,406, whilst in 2020 the number was 2,281 (UNHCR, 2021). Moreover, other EU and European migrants are relocating to Malta for employment, even if wages are considered to be low when compared to other European countries. Migration to the island is still perceived to be one of the most important issues that Malta country is facing, with 34% of the respondents for the Standard Eurobarometer 94 (2020/2021) highlighting it as their main issue of concern, preceded only by health, with the latter taking precedence in view of the COVID-19 pandemic.
- **Economic situation:** In recent years, Malta has enjoyed a strong economy, with unemployment at 4.5% in December 2020, measuring a 1.1% increase when compared to December 2019. (NSO, 2021) In spite of the COVID-19 pandemic, and in view of supportive fiscal measures, the labour market has been resilient, and in February 2021, the Central Bank of Malta revised its forecast to predict a stable recovery by 2023. More specifically, after an estimated contraction of 8.2% in 2020, the Bank expects Malta's GDP to grow by 5.0% in 2021, by 5.5% in 2022, and by 4.7% in 2023 and expects that 2019 GDP levels are to be recouped towards the end of 2022, even if conditional on the successful rollout of a vaccine in 2021 (Central Bank of Malta, 2021).
- **Political situation:** Malta is a parliamentary democracy in which two major political parties alternate in power. Since 2013, the country has been governed by the Labour Party (*Partit Laburista*, PL). Prime Minister Robert Abela succeeded Joseph Muscat, who left office on January 13, 2020, in the wake of mass civil society protests calling for his resignation, following arrests made in connection with the assassination of investigative journalist Daphne Caruana Galizia, including that of Muscat's Chief of Staff, Keith Schembri. The Nationalist Party (*Partit Nazzjonalista*, PN) remains in opposition and, in spite of regular reports on government corruption, the PN had been losing popularity, thus providing a weak opposition. In 2020, the leader of the PN, Adrian Delia, was challenged and he was replaced by Bernard Grech, a newcomer to the political class. The political landscape also includes smaller parties like the *Partit Demokratiku* (PD) and *Alternattiva Demokratika* (AD), who have recently formed a coalition (ADPD). In the past few years Malta has witnessed the birth of a far more vocal civil society, particularly on the rule of law issues.

- **Media market:** The two main political parties (PL and PN) are also key players in the media market, since they both own and manage multiple media platforms, including TV stations, radios, print and online outlets. Thus, they are actively contributing towards shaping the working environment for journalists and being a major influence on public discourse. Political party media ownership, however, has recently started to be challenged, following a court case filed by the online media platform *Lovin Malta*, with the aim to determine whether propaganda on political party TV stations should be declared unconstitutional. Internet is the most widely used medium, followed by online social networks and by television, which was, up to recent years, the preferred medium (Standard Eurobarometer 94, 2020/2021).
- **Regulatory environment:** The Rule of Law in Malta remains a topic of debate and is under much international scrutiny. In April 2021, the European Parliament adopted a resolution^[1] (with 635 votes for, 46 against and 12 abstentions) that outlined serious threats to media freedom, judicial and police independence, and the freedom of assembly, in spite of some welcome progress made in relation to the rule of law and judicial independence. The resolution also highlighted the harmful impact of citizenship and residence schemes on the integrity of EU citizenship, calling for increased transparency (EP, PR, 2021).
- **COVID-19:** The COVID-19 pandemic had an impact on multiple sectors in Malta, especially the tourism and leisure industries, since the country depends heavily on tourism for generation of income. The Government of Malta issued supportive economic measures, which, by and large, were well received. In spite of initial national outrage at the early re-opening of the country during the 2020 summer months, stricter measures were put in place in November 2020. This did not prevent a spike in cases in early 2021. However, the vaccine rollout has been efficient and is viewed as successful.

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

Overall, as in the previous report, the results of the MPM 2021 for Malta indicate medium risk for media pluralism. Though, several individual indicators point to high or very high risk levels.

Malta: Media Pluralism Risk Areas



- **Media regulatory authorities and bodies** - Malta still does not have an integrated comprehensive media authority, but only a broadcasting authority, leaving unregulated gaps in the media landscape. The Malta Communications Authority, operates in tandem with the Broadcasting Authority, but has a very specific and limited role in the overall regulation of media outlets.
- **Transparency of media ownership and governmental interference** - Although media ownership is, on balance, transparent, this is an area that remains problematic in the Maltese media landscape, in view of the fact that the two main political parties still own and operate outlets incorporating multimedia platforms. This has an inevitable negative impact on editorial autonomy, since it follows that ownership has a direct and vested interest in editorial direction. Furthermore, data on revenues is not publicly available and party owned media have failed, repeatedly, to file updated and audited accounts as required by law. Additionally, the PSM often face criticism as they are perceived to be a government mouthpiece.
- **Framework for journalists' protection** - Following the assassination of investigative journalist Daphne Caruana Galizia in 2017, the Maltese authorities have been under pressure, both locally and internationally, to offer better protection to journalists. A welcome development has been the change in approach of the Institute of Maltese Journalists (IGM), which has, over the past year, become more vocal about the needs of its members, as well as proactive in addressing obstacles faced by journalists

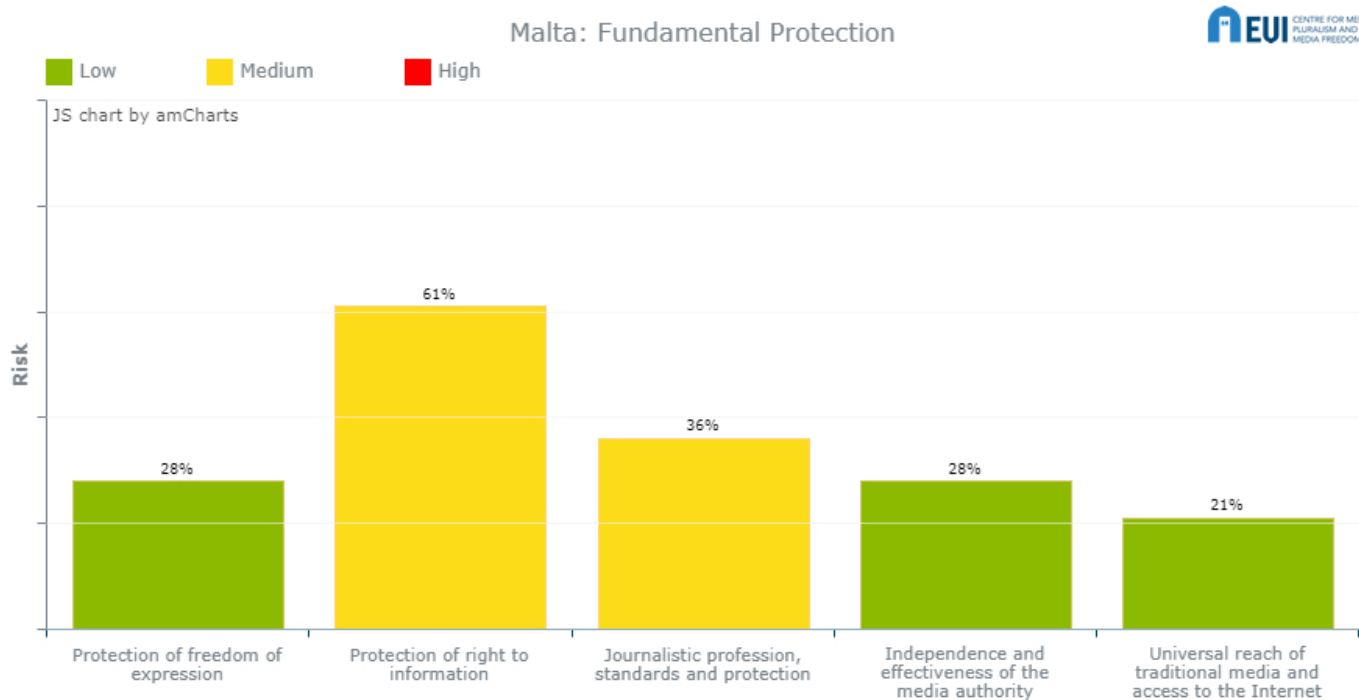
in the carrying out of their duties. Some issues, however, are far from being solved, as is the vilification of journalists, who are labelled as “traitors” for exposing corrupt individuals, and who are regularly the target of online groups. Over the past few years, the rule of law been under much discussion in Malta, and holding power to account has been a demanding task for the independent media.

The COVID-19 pandemic has had a negative impact on media outlets, who experienced a loss in revenue in view of decreased economic activity (Times of Malta, 2020a, April 10). Although the state did offer financial assistance to media houses, the manner in which this was distributed lacked transparency. Moreover, part of that financial assistance provided was state advertising.

3.1. Fundamental Protection (35% - medium risk)

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

The overall risk level of the Fundamental Protection area is medium, which is the same as for the previous two MPM reports.



The **Protection of Freedom of Expression** indicator reaches a relatively low risk score at 28%, although it is up by 4 percentage points from the MPM2020.

Freedom of expression is embedded in the Maltese Constitution (Article 41), and individuals are generally free to express their views on a variety of topics. On the other hand, Malta being a small society, many also choose to self-censor and, in fear of retribution, refrain from expressing any criticism of powerful actors. Journalists, especially those investigating corruption, have also been the targets of online harassment campaigns (Freedom House, 2021), a treatment that is also levelled at members of civil society who hold power to account. The presence of organised troll armies is an issue that perpetuates an atmosphere of

intimidation (Demarco, 2020).

The assassination of investigative journalist, Daphne Caruana Galizia in 2017, is still very much in the country's psyche and, consequently, the chilling effect this had on Malta's media landscape, can still be felt to this day. Nevertheless, in the wake of this singular event, Malta has also seen the emergence of a positively persistent and brave cohort of journalists and political commentators, many of whom have been instrumental in keeping Caruana Galizia's stories alive. Additionally, in January 2020, in a landmark case, civil society activist and blogger Manuel Delia won a constitutional case filed against then Minister for Justice Owen Bonnici, over the persistent dismantling of the makeshift protest memorial to Daphne Caruana Galizia. In a 115-page ruling, the judge established that "the persistent clearing up amounted to a breach of the applicant's right to freedom of expression." (Brincat, Carabott, Times of Malta, 2020). The ruling^[2] specified that the then Justice Minister's actions were divisive (Zammit McKeon, 2020, p.111), adding that "this interference was not legitimate as it was not prescribed by law, did not pursue a legitimate aim and was not necessary in a democratic society" (Columbia University, 2020).

The **Protection of the Right to Information** indicator scores a medium risk at 61%, at the higher end of this spectrum, and up 13 percentage points from the MPM2020.

The Freedom and Information Act^[3] was brought fully into force in 2012 and, in theory, guarantees access to information. In practice, journalists continue to consistently encounter difficulties when requesting government information: these include rejections, unnecessary delays, no reply scenarios, and the application of diversionary tactics. A case in point, is the request, made by *Lovin Malta*, trying to establish how much public money was used by ministers on their own personal Facebook pages, yet refused by the government since the collation of "the requested information would substantially divert the resources of the public authority from its other operations" (Peregin, 2021). Requests made by international NGOs were also refused, on the grounds that the person making the request had not been a Malta resident for at least 5 years and was, thus, ineligible (Ameen, The Shift News, 2020).

The **Journalistic profession, standards and protection** indicator scores a medium risk at 36%, down 4 percentage points from the previous MPM (MPM 2020, 40%).

In Malta, there are no legal obstacles which prevent a person from working as a journalist. The protection of sources is explicitly recognised by the law and is generally enforced in practice, although a recent case, wherein a magistrate ruled that journalists should be charged with contempt of court over the publication of stories considered to be of major public interest, raised deep concern (Times of Malta, 2021).

The Malta Institute of Journalists (IGM) is the only professional journalists' organisation in the country, and has, over the past year, been positively vocal in its defence of the rights of its members. Additionally, the recent establishment of a PEN Centre in Malta, by PEN International, is also a promising development. This said, a statement by Reporters without Borders (RSF) describes the media climate in Malta as "deeply divided", adding that "journalists who continue to pursue in-depth investigative reporting do so at great risk", and that the adoption of meaningful reforms have yet to be implemented (RSF, 2020). Additionally, investigative journalists critical of the state, are often subject to hate campaigns run on state sanctioned online hate groups, as stated by journalist and editor Caroline Muscat during her testimony in the Caruana Galizia Inquiry. (Demarco, The Shift, 2020). Also of concern is the fact that Malta has fallen 34 places in RSF's World Freedom Index since the killing of Caruana Galizia, and currently ranks 81st out of 180 countries.

The **Independence and the effectiveness of the media authority** indicator scores a low risk at 28%, down 9 percentage points from the previous MPM (MPM 2020, 37%).

There is still no overall media authority in Malta, but only The Broadcasting Authority (BA), which monitors

and regulates radio and television broadcasting, as well as some aspects of online audio visual publication. The main operation of this authority involves the monitoring and regulation of the PSM - Public Broadcasting Services (PBS), and general interest objective (GIO) stations. All five members of the BA board are political appointees, and are selected by the two main political parties, that is the party in government (PL) and the opposition (PN), who each appoint two members, whilst the chairperson is generally chosen by mutual agreement of the same two parties.

In spite of the fact that the Authority has clearly defined responsibilities at law, and is generally transparent about its activities, the very nature of its makeup, in terms of board appointees, is problematic.

The fifth indicator in this area, **Universal reach of traditional media and access to the Internet**, scores a low risk at 21%, down 12 percentage points from the MPM2020 (33%).

The risk score reflects a concentration in the internet service provider (ISP) market, with the two largest ISPs holding, between them, approximately 95% of internet subscriptions (MCA, 2020). On a positive note, Malta still enjoys almost 100% broadband coverage of 30 Mbps, and regulatory safeguards regarding net neutrality are implemented in practice under the watch of the Malta Communications Authority (MCA).

COVID-19 brought about new challenges to media practitioners, mainly in terms of financial pressures on media outlets in view of reduced economic activity. A number of newsrooms reported having to ask contributors to reduce or waive fees, in spite of financial subsidies given by the state. Media related activities were listed under Annex B of Malta Enterprise's COVID-19 wage supplement scheme, which stipulated that "full time employees of enterprises in other adversely affected sectors (Annex B), including wholesale, manufacturing and warehousing will be entitled to one days' salary per week equivalent to €160 per month. Part-time employees will be eligible to one day's salary per week, equivalent to €100 per month." (Malta Enterprise, 2020) These subsidies were also a point of controversy, with the International Press Institute reporting a "non-transparent system of providing public aid to media outlets" as one of the major issues (IPI, 2021).

Additionally, in April 2020, the government announced that media organisations - TV and radio stations, newspapers and news portals - would also receive financial assistance in view of the economic downturn caused by the pandemic. The statement issued "did not say what form the aid would take or how much financial assistance would be granted to organisations though details were given to the media owners." (Times of Malta, 2020b, April 10) However, Malta Enterprise's aid guidelines state that TV media providers were entitled to up to €45,000 in direct aid per month, as long as such providers employed at least four full-time journalists. Essentially, this meant that only three TV stations were eligible for this state aid - TVM (PSM), One TV (owned by the Labour Party) and Net TV (owned by the Nationalist Party). Newspapers were entitled to €10,000, per month, whilst online news portals and radio stations were eligible to receive €5,000 and €3,500 per month, respectively. Media houses providing a news service on more than one platform were also entitled to a further €10,000 (Diacono, 2020).

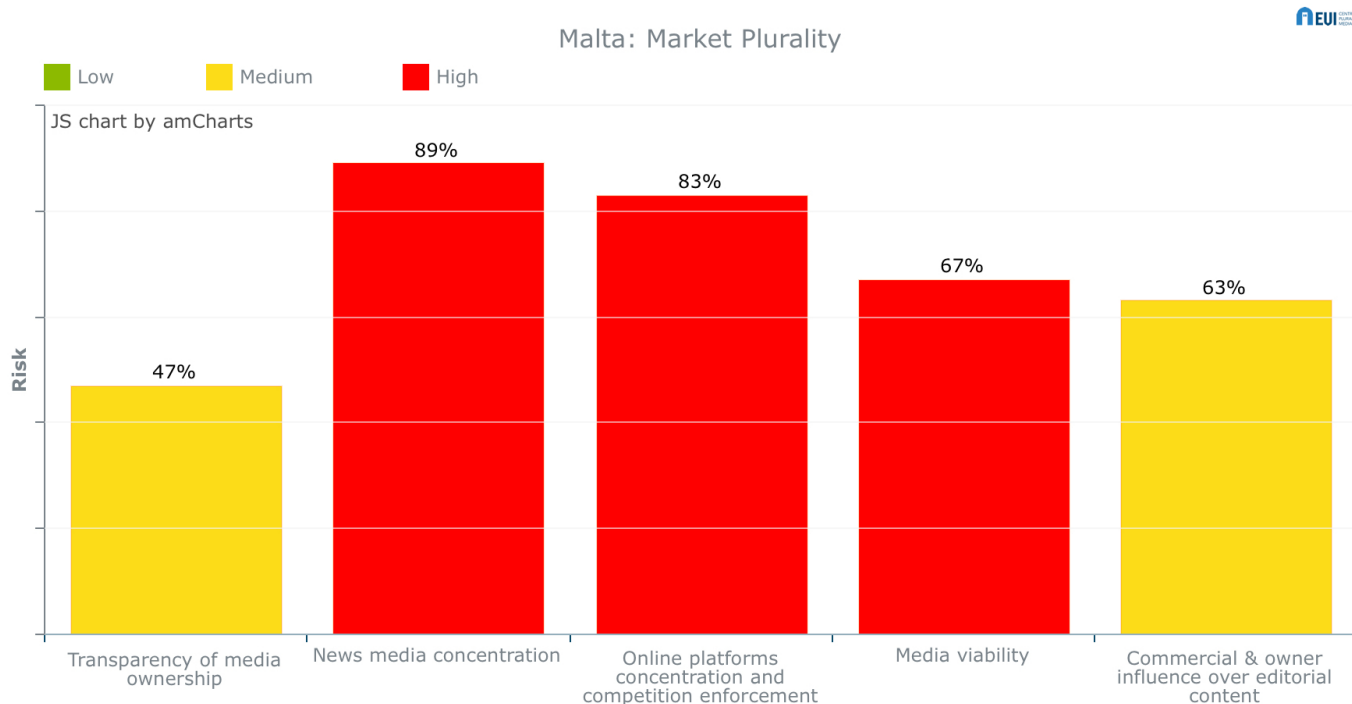
Generally, reporting on the pandemic itself was consistent, and information was made available, although a ruling by the Broadcasting Authority to suspend the broadcast of journalists' questions, on the PSM, after COVID-19 press briefings came under heavy criticism and was described by the IGM as "a slap in the face of democracy" (IGM, 2020).

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

As in the previous MPM report, Malta continues to score an overall high risk in the area of **Market Plurality**, with three indicators clearly hitting the high risk band: News-Media Concentration, Online Platforms Concentration and Competition Enforcement, and Media Viability.



Transparency of Media Ownership is assessed as a medium risk at 47%, 1 percentage point more than the last MPM (MPM 2020, 46%).

The general public is well aware as to who owns which media in Malta, especially in view of the fact that political parties openly own and manage multi-media operations, even if there are no specific legal obligations, beyond the Companies Act^[4], for media organisations to publish their ownership structures. Like any other Maltese company, media companies must register with the Registrar of Companies (RoC), and submit information which also includes shareholding, and thus, ultimate beneficial owners. This information is available online, with limitations, as some aspects, like company accounts and related documents may only be accessed against a fee. The Broadcasting Authority has a right to obtain any type of information it considers necessary from the license holders, but does not make this information public, whilst the Press Act^[5] (article 51(1)) requires every newspaper to publish the name of its publisher, although the latter does not ensure transparency of the actual ownership structure. Such an obligation covers newspapers only, and other publications, like magazines, do not fall under the scope of this provision.

The **News Media Concentration** indicator scores a high risk at 89%, 9 percentage points up from the MPM 2020 (80%), the highest scoring risk indicator under this category.

Media legislation, namely the Broadcasting Act^[6], contains specific limitations to prevent a high degree of horizontal concentration of ownership in the audio visual media sector. However, there is a worrying lack of data pertaining to the market share of individual news outlets. The lack of data is scored as a risk according to MPM methodology, as it reduces transparency and contestability of the market. In terms of TV audiences,

some information is available, and shows that the top four media owners, which include the PSM and the party-owned stations, dominate when it comes to audience numbers (Broadcasting Authority, 2021). The print market is to date unregulated, and no data regarding circulation or readership is available, making a thorough and accurate assessment of this sector impossible.

The **Online Platforms Concentration and Competition Enforcement** also scores a high risk, at 83%, 2 percentage points more than the previous report (MPM 2020, 81%).

As with the News Media Concentration indicator, there is a lack of available data with regards to advertising revenue and audience concentration, as well as no specific regulation for this market, but only generic regulation in relation to the Malta Competition and Consumer Affairs Authority. This further highlights the need for a comprehensive Media Authority that would potentially oversee the sector so as to contribute towards the evaluation and the prevention of a high degree of concentration in the advertising market.

Additionally, a bone of contention between media outlets is the fact that the PSM is in the advantageous position of generating revenue through the sale of advertising, whilst simultaneously receiving state funding. Other media organisations contend that this creates an unfair scenario, especially since the PSM may offer attractive packages surrounding its online activities, since it also enjoys top spot in terms of TV audiences.

The **Media Viability** indicator score moves from the medium risk score of 2020 (63%) into the high risk band at 67%, up 4 percentage points.

Little or no data is available regarding revenues for each sectors. However, the general feedback from all legacy media sectors is that advertising revenues have decreased, in view of increased spending on digital platforms, and especially since advertising agencies and businesses are allocating parts of their budgets to social media platforms. As mentioned above, independent media organisations also have to compete with the PSM, which, apart from receiving state funding, also sells advertising time and space (online). Furthermore, both political party owned stations have not published their accounts in over 10 years, even if they have a legal obligation to do so annually under the Companies Act (Bonnici, LM, 2021).

Added to this, the Covid-19 pandemic has further reduced the income for media houses, with anecdotal reports of a drastic reduction in advertising, as well as the engagement of fewer freelancers.

The **Commercial and Owner Influence Over Editorial Content** indicator scores a medium risk of 63%, down 10 percentage points from the previous MPM (MPM 2020, 73%).

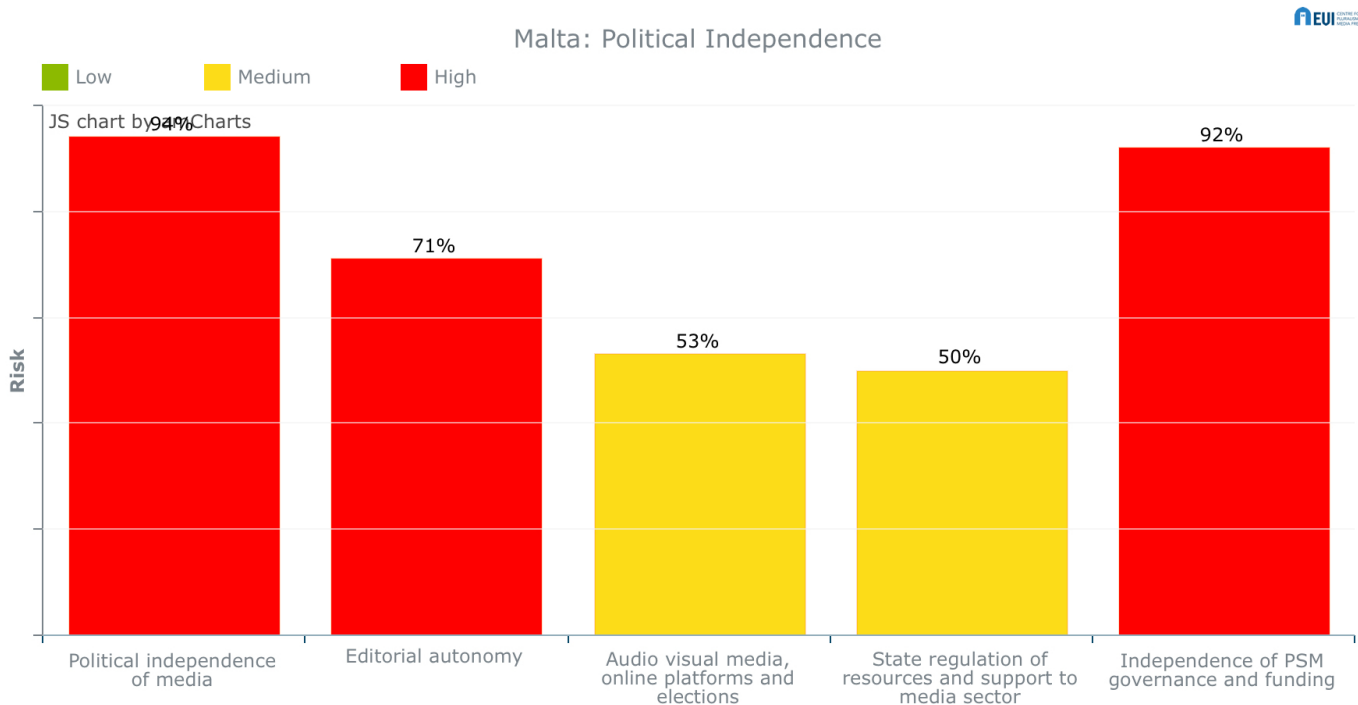
The IGM guidelines are very clear and define any form of commission-based publicity or editorial favours as a breach of ethics. Yet, there are still no clear safety measures to prevent the influence of commercial and/or political interests over the appointments and dismissals of editors-in-chief, quite the opposite, since a significant number of media outlets are owned by political parties that, inevitably, have a direct influence on their newsrooms. Political parties are also, often taken to task over their relationship with “big business”, further complicating the issue. Contrastingly, news media organisations like The Shift News have a very strict and transparent procedures, and are committed towards preserving their credibility, as can be seen in their end of year piece “The Shift’s Financials: Taking a stand for transparency” (The Shift News, 2020). Blogger Manuel Delia also discloses advertising revenue, which is only generated automatically via Google or Taboola Ads, since all requests for direct advertising are rejected, as well as amounts received through subscription and donations, together with a statement that “no donation was accepted from any corporate body, organisation, government or the like” (Delia, 2020).

3.3. Political Independence (72% - high risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and

access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and availability of plural political information and viewpoints, in particular during electoral periods.

As per the MPM2020, the overall score for Political Independence remains high risk, with three indicators being at high risk: Political Independence of Media, Editorial Autonomy, and the Independence of PSM Governance and Funding, the same three indicators that were deemed high risk in previous MPMs.



The **Political Independence of Media** indicator is at a very high 94% risk level, which is identical to the previous MPM.

There is no law that makes government office incompatible with media ownership, and political parties are expressly permitted to own, control or be editorially responsible for nationwide television and radio services, under certain conditions (Broadcasting Act, Part III, Article 10, paragraph 4D, 2020[1991]). The two leading political parties - the PL, in government, and the PN, in opposition - both own multiple media companies, which include a TV station, radio station/s, newspapers and online news portals. This scenario has recently been challenged by the outlet Lovin Malta, who filed constitutional action aimed at annulling a Broadcasting Act provision that allows political party stations to bypass the principle of impartiality, arguing that both party-owned stations could not be non-partisan by nature and, consequently, were in breach of the constitution (Brincat, Times of Malta, 2021).

Recent developments, on stories that were initially covered by Daphne Caruana Galizia, have revealed that a business relationship between ex-Prime Minister Joseph Muscat's chief of staff, Keith Schembri, and the ex-Times of Malta General Manager, Adrian Hillman, involved alleged schemes of money laundering and kickbacks, also raising concerns that such a relationship impacted the editorial line of the Times of Malta, a claim that was denied by past and present editors of the same news outlet. Investigations have led to arrests, including Schembri's, as well as an extradition order requested for Hillman, who is currently residing in the UK (Martin, Brincat & Leone Ganado, Times of Malta, 2021).

Furthermore, the appointment of a Labour Party sympathiser as the PSM's editor-in-chief has cast doubt on

whether public service media will be truly unbiased. The Shift News reported that an in-house analysis showed "consistent under-reporting of major scandals which dominated all other media outlets, except the Labour Party owned media" (Schembri, The Shift News, 2020). This becomes even more problematic when one considers that audience figures for TV for the last quarter of 2020 show the PSM's share at 48.1% and the PL-owned One TV at 23.8% (Broadcasting Authority, 2021).

The **Editorial autonomy** indicator also scores a high risk 71%, again, an identical score to the previous MPM.

In the absence of common regulatory safeguards in the appointment or dismissal of editors, and since the two leading political parties own multiple media outlets, it follows that political influence in such appointments or dismissals is inevitable. It is also largely acknowledged that political influence is prevalent, especially in view of the fact that Malta is small and overcrowded, so proximity tends to be an issue.

Since the last MPM, the Institute of Maltese Journalists (IGM) have updated their code of ethics (Journalistic Code of Ethics, 2020), and have also highlighted the implementation of measures of self-regulation as one of their primary objectives.

The **Audio Visual Media, Online Platforms and Elections** indicator scores a medium risk at 53%, up 17 percentage points from the previous MPM (MPM 2020, 36%).

The fair representation of different political actors and diverse viewpoints during periods of elections is overseen by the Broadcasting Authority, which issues guidelines for TV and radio stations (Broadcasting Guidelines, 2021) to follow. However, it tends not to be proactive in monitoring campaigns, and takes a reactionary stance in instances of complaints submitted by stakeholders. The BA also focuses most of its efforts on keeping a close watch on the PSM. The fact that TV stations have online portals, and the presence of social media have somewhat altered the realities of representation, has led to critics describing the BA's approach as outdated and limited in scope. Additionally, smaller parties feel discriminated against, as they are not given an equal share of airtime, since this is calculated based on size and representation. The increase in the risk score is also in view of the fact that, for the previous MPM, a fair amount of representation on private channels had been registered, since this was being measured against the participation of candidates contesting in the European Parliament Elections. During the past year, there were no elections in Malta, which further highlights the fact that there are no self-regulatory measures in place to ensure the visibility of all political actors on the private stations' spectrum. Additionally, the increased risk is also in view of a slight methodological change in relation to greater weight being given to the digital variables, in particular to online advertising (political).

Political advertising on nationwide broadcast channels has to be clearly marked, but the absence of a Media Authority means that the online scenario, which is starting to overtake broadcast in popularity, is largely unregulated, since there is no procedure in place that regulates the transparency of political advertising, or potential subliminal messaging.

The **State Regulation of Resources and Support for the Media Sector** indicator scores a medium risk at 50%, which is identical to the score obtained in the two previous MPM reports.

The Government in Malta does not normally provide any subsidies to privately-owned media, and limits itself to subsidising the PSM. During the COVID-19 pandemic, however, this changed, and independent media outlets were given financial assistance by the state, partly as cash injections and partly against advertising for ministerial and government entities. Critics of the COVID-19 subsidy scheme claim that the packages were designed in a manner that would benefit politically owned media houses over independent outlets, with the process lacking transparency. A number of FOI requests in this regard, made by The Shift News, remained unanswered. It is also unclear whether independent newsrooms were subject to specific

terms for the funds to be approved. This issue has also been included in the European Commission's 2020 Rule of Law report on Malta (IPI, 2020).

Requests for the disclosure of government's expenditure on advertising and communication also remain unanswered, due to a ruling by the Speaker of the House, who conceded to Prime Minister Robert Abela's assertion that collecting the information required was too costly (Cordina, Newsbook, 2021).

The **Independence of PSM Governance and Funding** indicator scores a high risk at 92%, up 9 percentage points from the previous MPM (MPM 2020, 83%).

The PSM is particularly vulnerable to political influence, since the government has a significant and direct influence on its structure, in view of the fact that members of its Board of Directors, as well as its Editorial Board, are appointed by the state. Additionally, key decision-making personnel is also appointed by the Minister concerned.

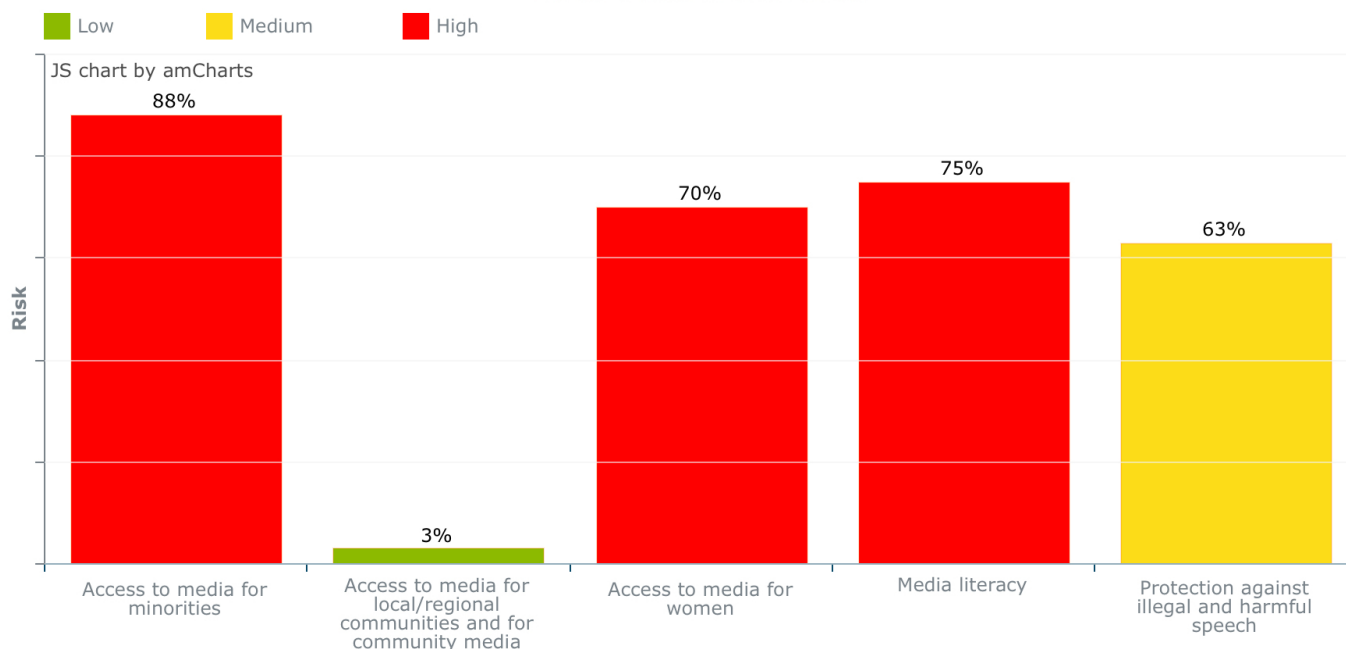
The state funds the PSM through a direct grant, with the amount of the grant being decided upon by the government at its own discretion. The change in risk assessment is due to a recent development which impacts the transparency of PSM funding: in September 2020, the Minister responsible announced that €30 million would be allocated to PBS from public funds, spread over the next five years (The Shift News, 2021). Despite the company receiving almost half of its income directly from the government, the latest available accounts show heavy losses. At the same time, the PSM is free to sell advertising under the same conditions as other independent media outlets, giving it an unfair advantage when one considers the strong presence it has in terms of audience numbers. It also receives other direct government grants for a range of services (like Malta's EU Presidency or the hosting of the Junior Eurovision), as well as a stream of advertising bookings from the government or related agencies.

3.4. Social Inclusiveness (60% - medium risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. In addition, for the 2021 edition of the MPM, a new indicator has been added to the Social Inclusiveness area in order to assess new challenges arising 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.

Overall, the Social Inclusiveness area scores a medium risk, with three indicators being in the high-risk band: Access to Media for Minorities, Access to Media for Women, and Media Literacy. Protection against illegal and harmful speech scores a medium risk, whilst access to media for local/ regional communities and for community media scores a very low risk at 3%, in view of Malta's geographical size and small population.

Malta: Social Inclusiveness



The **Access to Media for Minorities** indicator acquires a high risk score at 88%, down 9 percentage points from the MPM 2020 (97%). Although this might be perceived as a slight improvement, the decreased risk score is due to a change in methodology, and not because any actual progress has been registered.

There are no legally recognised minorities in Malta and, as a result, there are no specific provisions relating to access to airtime for underrepresented groups. One cannot ignore the fact, though, that there are, in fact, minorities residing in Malta, in view of the number of immigrants arriving by boat, as well as third country nationals who move to the island to work in the health and care sectors. Consequently, their lack of visibility on and adequate access to local media is detrimental to any progress being made with regards to effective integration.

Very little research has been conducted in this field, so an accurate picture may not be drawn. A scan of local media platforms highlights the absence, or in some cases misrepresentation, of minority groups, which perpetuates marginalisation and does very little to counteract the racist and populist narrative, mainly present on social media platforms and news site comments boards.

Essentially, the risk factor stems from the lack of comprehensive research on the media representation of different minorities. One must also acknowledge, though, that some independent media outlets do make a concerted effort in covering minority stories sympathetically. Although Malta has a National Disability Strategy, based on the National Policy on the Rights of Persons with Disability, this group is also underrepresented, and subtitling and/or sign language options tend to be the exception, not the rule. COVID-19 press conferences and updates on the PSM, however, have, to date, always featured sign language interpreters. No audio descriptions are available for blind people, possibly due to lack of expertise as well as budgetary reasons. On June 9, 2021, the Ministry for Inclusion and Social Wellbeing published a consultation document that should yield an updated strategy. The document identifies existing shortcomings, including the representation and participation of persons with disabilities on local media, as well as accessibility. At this stage, this is a working document and, although it identifies what needs to be done, does not specify how changes will be implemented. ^[7]

Access to Media for Local/Regional Communities and for Community Media scores the lowest risk in this area at 3%, 16 percentage points lower than the MPM 2020.

There are no regional or local media outlets in Malta, but there is also no risk related to this factor due to the

geographical size of the country. Community radio stations, on the other hand, are explicitly recognised by the law^[8] and are widely present in the country. These media outlets are very small operations, all having a specific, localised (village) scope, meaning that the absence of funding does not represent a risk.

Access to media for women scores a high risk at 70%, down 10 percentage points from the previous MPM. (MPM 2020, 80%)

In spite of a slightly decreased high risk score, women are still underrepresented in a number of areas within the media. When it comes to Boards of Directors, an improvement has been noted in the PSM, which now has 4 women out of 9 members (appointed in 2020), whilst all the other private broadcasters have no women on their boards, except 1 woman (out of 5 members) on the One Group Board of Directors. The PSM also appointed a woman editor in chief in 2020, although to date, across the media landscape, very few women have been at the helm of a newsroom - at present these include online news portal Newsbook, and The Shift News, which is led by its founder.

The participation of women in current affairs and representation in news programmes is also problematic. An early forecast of the latest Global Media Monitoring Project (GMMP 2020) results, in which Malta has been a participant since 2000, suggests that, whilst some progress has been noted, “women’s invisibility as subjects and sources is still the norm.” (WACC | GMMP Results, 2021) Mediating Women, an NGO founded in 2020 with the primary objective of redressing the balance, has consistently called out producers for excluding women from the narrative, highlighted 'manels', as well as launched a #fixedit campaign that addresses the appropriate use of language in headlines.

The **Media literacy** indicator scores a high risk at 75%, a marked rise from the medium risk score in 2020, and up by 23 percentage points (MPM 2020, 52%)

Malta still has no official policy on media literacy, although a step in the right direction has been noted with a newly appointed Media Literacy Development Board, which will function in consultation with the Broadcasting Authority, as well as other government entities (so far unspecified) with the objective of drafting a way forward and promoting the development of media literacy skills. (Government of Malta PR, 2021) Media literacy is not an intrinsic part of the curriculum, but rather one of the subjects that may be offered by individual schools as a non-compulsory option at secondary school level. The substantially increased risk score is mainly in view of the fact that, apart from still not having a clear policy, as well as Media Literacy not being a compulsory subject in the education curriculum, in Malta there are also practically no independent initiatives aimed at addressing the issue effectively and, considering Malta's particular media landscape, it is an area that needs urgent attention and focus.

However, Malta does have a digital literacy policy^[9], and such skills are an essential part of the education curriculum at all levels. COVID-19 data and information was accessible on a dedicated landing page, and infographics were easily available on social media platforms.

Finally, the **Protection Against illegal and Harmful Speech** indicator scores a medium risk at 63%. This was not included as an indicator in the MPM 2020, and, therefore, cannot be compared.

The Hate Crime and Hate Speech unit was set up in October 2019 to provide legal and psychological support for victims of hate crime, including online hate speech (The Malta Independent, 2019). Since its opening in 2018, 251 reports were filed, out of which 161 did not meet its criteria to constitute incitement of violence or lacked evidence. In total, 63 victims of hate speech and hate crime were identified, 39 of which received emotional support, whilst 8 were referred to therapy, and 9 were provided with free legal assistance (Vassallo, 2021).

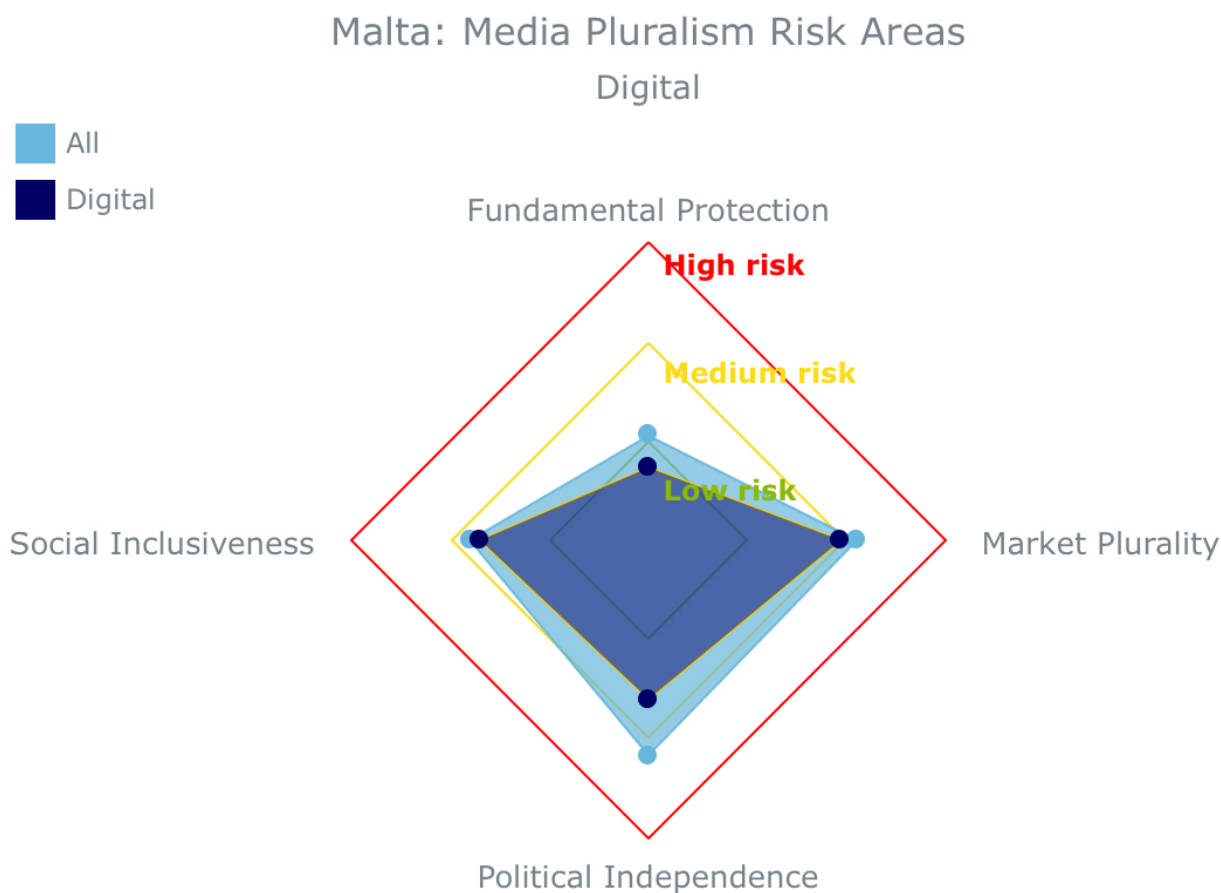
To date, Malta has never submitted information on hate crimes to ODIHR, the latter observing that Malta has not reported, periodically, reliable information and statistics on hate crimes (OSCE - ODIHR, 2021).

Malta also features prominently in the 2020 Global Inventory of Social Media Manipulation Report, which lists government agencies, politicians and political parties, as well as private contractors as formal coordinators of online activities (Bradshaw, 2020).

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

Fundamental Protection | Digital

When compared to the overall MPM scores for Malta (35%), the digital variables for Fundamental Protection score 11 percentage points less at 24%, which places them in the low risk band.



The **Protection of freedom of expression** online is not clearly defined at law. Article 41(1) of the Maltese Constitution^[10] is not relevant to a specific medium, so the wider interpretation is that this is extended to freedom of expression online. The Broadcasting Act^[11] has been amended so that on-demand services fall under the scope of the same legislation, which allows for restrictions to freedom of expression, and which appear to comply with the criterion of clear definition, for example, freedom of expression of on-demand providers and restrictions to protect minors. Overall, new media are not regulated to the same extent as legacy media, although freedom of expression should be guaranteed as enshrined in Article 41(1) of the Constitution.

There is also no evidence to suggest that the state, ISPs or online platforms filter, block or remove online content in an arbitrary manner, apart from ISPs blocking inappropriate content to protect minors, or news media platforms mediating comments boards to exclude hate speech, in accordance with the law. On the other hand, monitoring and data harvesting by the state might still be taking place, in the name of intelligence activities and security operations. Furthermore, in mid-2020, following an official complaint to the Standards Commissioner filed by Lovin Malta CEO Chris Peregine, a magisterial inquiry and a separate probe by the Economic Crimes Unit were launched to investigate the entire cabinet of the Malta government on the possible misuse of public funds to boost personal Facebook pages, instead of setting up ministerial ones (Agius, Newsbook, 2020).

No new restrictions, in relation to the reporting of Covid-19, were introduced, either, and daily updates and data were freely available and accessible online.

Journalistic profession, standards and protection - 2020 saw less reports of DDOS attacks on independent media, although a few days after the March 2021 arrests (Schembri/Hillman case), blogger Manuel Delia reported one such attack. (Delia, 2021) Additionally, the online hate groups investigated by the Shift News back in 2018 are still in operation. Journalists investigating corruption stories and those who are critical of the government are often targeted. (The Shift News, 2018) Also, a high level of misogyny online is evident and, although there is no data available, women journalists have reported being targeted, discredited and threatened (Mediating Women, Webinar, 2021).

The E-Communications Regulations establish all the rules on how telecoms operators and ISPs can or cannot retain data, that is, as legislation in compliance with articles 8 and 10 of the European Convention on Human Rights. Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 has been transposed to Maltese legislation. Malta, through national legislation, has also implemented the derogation provided for the GDPR on freedom of expression and journalistic activities in a way that complies with article 10(2) of the European Convention on Human Rights.

Universal reach of traditional media and access to the Internet - The whole population is covered by broadband and at least 90% of households are subscribed to a service. The top two ISPs hold 95% of the market share (MCA, 2020). Regulatory safeguards regarding net neutrality are in place and being implemented, and there are no records of restrictions on content.

Market Plurality | Digital

The digital variables for Market Plurality score 65%, that is 5 percentage points less than the overall high risk score for Malta (70%), which places them at the higher end of medium risk. Although the Broadcasting Act imposes some restrictions on the private industry in terms of media concentration, these do not apply to new media (Zammit, 2019).

Transparency of media ownership - There are no specific obligations whereby media companies, including digital news media, are required to publish their ownership structures on their website or in records or documents that are accessible to the public, apart from those set by the Maltese Companies Act, which include the need to register with the Maltese Registrar of Companies, giving details on company ownership and structure. This information is available online. The details that are accessible to the public for free, whilst limited, do include UBOs. In Malta's case, native digital media companies offer full disclosure of ownership.

News media concentration - In Malta, media concentration rules exist only for radio and television services. No data is available in relation to market share or audience share. The same goes for market share of news media owners across different media markets. The Broadcasting Authority Audience Survey for December 2020 states that 27% of respondents, which tend to fall within the 12 to 40 age bracket, follow news online. Of this group, 56% preferred the Times of Malta, 16% got their news from Facebook, and 9% from tvn.com.mt (PSM) (Broadcasting Authority, 2021).

Online platforms concentration and competition enforcement - According to the latest available Eurobarometer data (94, 2020-2021), in a shift away from television when compared to previous waves, the internet (79%) is the most used medium, followed by online social networks (73%) and then television (71%), unless users are looking for national political matters, where TV reclaims the top spot (70%), followed by online social networks (55%) and websites (53%).

There is no data in relation to online advertising market share or audience share of online platforms. Also, a high degree of concentration in the advertising market may not be prevented through the enforcement of competition rules, since there is no regulator or regulation that takes into account the specificities of the media sector. The PSM is in the advantageous position of generating revenue from the sale of advertising against its services, which include an online news portal, added to the receipt of state funding.

Media viability - There is no data on whether advertising expenditure has increased or decreased (online or offline) over the past year, although anecdotally, most media houses complain of drastic reduction. There are a limited number of initiatives that have steered away from applying traditional sources of revenue, like The Shift News (native digital) who do not accept direct advertising and rely on NGO grants, crowdfunding/donations and online advertising platforms (eg. Google Ads), as does blogger Manuel Delia. Lovin Malta also use the crowdfunding approach when launching particular initiatives, and some newsrooms, like the Times of Malta, have an appeal mechanism in place for readers to support their efforts. Over the past year, in view of the COVID-19 pandemic, media houses also received financial assistance from the state (in the form of a cash injection and advertising), which was a first and unique scenario, since media state funding is normally only reserved for the PSM.

Commercial & owner influence over editorial content - Whilst the IGM code of ethics applies to all journalists across all media, "new media content is notably one of the most under-regulated subject matters within the sphere of Maltese media law." (Zammit, 2019) Maltese regulators tend to adopt a technology-neutral approach when regulating online media, referring to existing laws as a departure point. Apart from the obvious political influence, there is the risk of indirect pressure from the commercial sector, since party funding, unofficially, also relies on business benefactors.

The COVID-19 subsidies partly resulted in government entities and ministries becoming a major "clients" in this regard. This has raised some concern (IPI, 2021) as to the effect that such adverts might have on news content published, even if a number of media houses, supported by the IGM, strongly deny being conditioned in any way by the assistance given (Times of Malta, 2020).

Political Independence | Digital

At 53% medium risk, the digital variables for Political Independence score a substantial 19 percentage points less than the overall score, which is still placed in the high risk band at 72%. This decrease, when compared to legacy media, is, potentially, in view of the fact that native digital platforms are not affiliated to any political entity.

Political independence of media - Both The Shift News and Truth be Told (manueldelia.com) depend on readers' subscriptions and contributions. They carry no direct advertising, except those generated automatically online, like Google and Taboola ads. Lovin Malta is a commercial entity, and does carry direct advertising, which includes advertising booked by government and governmental agencies. However, Lovin Malta are also very vocal about corruption and justice issues, and have launched a number of investigations/legal challenges targeting both the government and the opposition. Of course, having the government as a "client," always poses a risk, especially in the current circumstances, as conflicts of interest, inevitably, arise.

Editorial autonomy - There are no specific codes of conduct or guidelines for the use of social media by journalists, apart from the generic guidelines (Code of Journalistic Ethics, adopted 2020) endorsed by the Institute of Maltese Journalists (IGM), which include nothing specific with regards to social media. Some media outlets, like TVM, Newsbook and The Times of Malta, adopt their own internal guidelines.

Audio visual media, online platforms and elections - There is no legislation regulating political advertising online and on social media to this effect. Strictly speaking, Maltese law demands “the two days of silence” on the day before, as well as on election day itself, wherein political advertising is prohibited on any medium, including online media, by means of an Article entitled "Prohibition of activities capable of influencing voters immediately before the election" (General Elections Act, 345, Art. 114 (1), 2021 [1991], 59). In reality, this is impossible to enforce. This was challenged by Daphne Caruana Galizia on the eve of the 2017 election day, which led to her arrest for posting content, following a complaint received by the police authorities (Caruana Galizia, 2017). She argued that her posts, whether posted on the day, or before, were also accessible on the “two days of silence”. The MPM (Malta team) wrote to the Malta Electoral Commission enquiring about any legislation ensuring transparency of political advertising on online platforms during electoral campaigns, but no information about the matter was received.

When it comes to campaign spending, candidates seem to be more heavily regulated than political parties. Candidates’ declaration of expenditure entails listing different expenses. However, there is no legal requirement to provide receipts as proof of expenditure, raising concerns that the current procedure lacks accountability. Additionally, political parties are not obliged to break down their electoral campaign expenditure in detail. In their submission of their annual expenditure report to the electoral commission, the sums outlined are generic and there is no breakdown in relation to campaigning, but a lump sum instead. Thus, verifying how much was spent on which media, is not possible.

Facebook Ad Library is fully operational, even if the total spend by certain actors might be seen as unrealistic. The Data Protection Act (2018) came into force in May 2018. To date, there are no records of monitoring exercises or fines given to political parties in relation to the unsanctioned use of personal data on individuals by political parties for electoral campaigning purposes, yet it is common knowledge that parties make use of previously obtained data (membership, research) for campaigning purposes. It is not excluded that consent is being sought since the Act came into force.

Independence of PSM governance and funding - Apart from public funding, PBS competes with private media houses in advertising sales, and has the predominant share of the market. The National Broadcasting Policy states that the PSM has to report to the Government of Malta on an annual basis to review whether funds allocated were spent adequately and to give details as to their conclusions, as well as provide an estimate of what is due, in the case of amounts not spent. Additionally, the Broadcasting Policy includes a dedicated section on PSM Digital Media, but it does not specifically outline funding strategies, except a relocation of efforts that are to migrate from loss-incurring audio visual production to better online content generation.

As referenced earlier in the report, the PSM has been allocated €30 million in public funds for the next 5 years - which is high by Maltese media-budget standards - as part of a regeneration exercise (The Shift News, 2021).

Social Inclusiveness | Digital

When compared to the overall MPM scores for Malta (60%), the digital variables for Social Inclusiveness score 3 percentage points less at 57%. Essentially this reflects the overall trends seen in legacy media, and in view of the fact most cases of hate speech, especially towards ethnic minorities (but not limited to) take place online.

Media Literacy - Although Malta has had a Digital Literacy Policy^[12] in place since 2015, the country still has no Media Literacy Policy. A Media Literacy Development Board^[13] was recently appointed by the Minister responsible following a discussion on the implementation of the European Directive on Audio Visual Media.

Internet usage in Malta is on the increase and there is a noticeable shift away from television. 56% of the population have basic or above basic overall digital skills, whilst 29% that have low overall digital skills^[14]. As mentioned in Chapter 3.4, Malta is also in urgent need of a Media Literacy Policy, as well as clear way forward in terms of a drive that would concentrate on informing and educating the population at large to have the necessary skills to combat disinformation. This is particularly relevant in view of revelations following a 2018 investigation by The Shift News, uncovering secret online hate groups with tens of thousands of members, "replete with hate speech and routinely used to manipulate online polls in the government's favour or co-ordinate online 'mobbings' on critics or activists." (The Shift News, 2018) To date, there is no evidence to show that these groups have been taken down.

Protection against hate speech on social media - Whilst there is more awareness as well as mechanisms in place to report hate speech as a crime through the Hate Crimes & Speech Unit, social media witnesses considerable amounts of hate speech some of which would classify as illegal incitement to violence or hatred. Experts agree that the most targeted group are asylum seekers, refugees and third-country nationals in general. These minority groups are particularly vulnerable as they generally do not have adequate access to effectively address hate crimes committed against them (Bayer & Bard, 2020). Additionally, there are no reports of the closed online hate groups uncovered by The Shift News in 2018 have been taken down.

The lower risk scores for the digital variables, which are not unsubstantial (with the exception of Social Inclusiveness) are mainly in view of the native digital media being more transparent about their operations in general, as well as the fact that they are less likely to be politically influenced.

5. Conclusions

The results from the MPM 2021 clearly shows that Malta has a number of pressing issues that need to be addressed and resolved in all areas of the Monitor.

Fundamental Protection is the only area with no high risks scores, although with two indicators scoring medium risk, certain problems, evidently, need attention. Since the previous MPM, a positive change has been identified, in that the IGM (Institute of Maltese Journalists) is taking a more proactive role in safeguarding the rights and safety of its members. More pressure needs to be made by all stakeholders in addressing serious concerns about requests related to Freedom of Information, as this seems to be a persistent issue across newsrooms.

In the area of **Market Plurality**, the high risk scores are mainly related to the lack of monitoring and absence of data on the market shares of media companies, both legacy and digital, as well as information on print media circulation figures. Research and the systematic and regular collection of accurate data is key to the strengthening of the media landscape, and lack of information on multiple aspects is detrimental to any progress being made as problematic areas cannot be identified and, consequently, addressed.

The highest risk scores for Malta are in the area of **Political Independence**, in view of serious issues in relation to the political party owned media, as well as concerns over the lack of independence in PSM governance, funding and editorial independence. The conversation about politically owned media has begun, and the need for a strategic way forward is imperative for media pluralism to be achieved. Additionally, a policy, with clearly defined objectives needs to be put forward for the PSM, so as to safeguard its role as a trusted public service.

The area of **Social Inclusiveness** also sees very high scores, particularly in the areas of minority group representations, access to media for women and media literacy, with protection against illegal and harmful speech also an area of concern. It is being recommended that the Broadcasting Authority addresses issues of underrepresentation (ethnic minorities, women, persons with disabilities), not only through recommendations, but by means of clear guidelines that demand implementation. Additionally, the formulation of a comprehensive media literacy policy, that encompasses both educational and legal parameters, needs to be designed and implemented with urgency, if Malta is to start making any progress in the critical evaluation of media by consumers and a significant reduction in hate speech.

Finally, the general recommendation that is being made, and that would have an impact on all areas mentioned above, is the establishment of a comprehensive and independent Media Authority, set up with the input and participation of all stakeholders. Such an authority would not only protect the rights of those who operate within the field, but would, amongst other things, contribute towards improving the sector operationally, as well as strengthening the credibility of its practitioners, by overseeing that expected standards are met by all media houses.

6. Notes

- [1] European Parliament resolution of 29 April 2021 on the assassination of Daphne Caruana Galizia and the rule of law in Malta, https://www.europarl.europa.eu/doceo/document/TA-9-2021-0148_EN.html
- [2] The full text of the judicial decision in the case Delia v. Minister for Justice of Malta Owen Bonnici, Case Number 93/18 is available in Maltese at:
<https://ecourts.gov.mt/onlineservices/Judgements/Details?JudgementId=0&CaseJudgementId=120292>
- [3] Freedom of Information Act, <https://legislation.mt/eli/cap/496/eng/pdf>
- [4] Companies Act, Chapter 386/1996, <https://legislation.mt/eli/cap/386/eng/pdf>
- [5] Press Act, Chapter 248/1974, <https://legislation.mt/eli/cap/248/eng/pdf>
- [6] Broadcasting Act, Chapter 350/1991, <https://legislation.mt/eli/cap/350/eng>
- [7] https://meae.gov.mt/en/Public_Consultations/MISW/Pages/Consultations/Maltas20212030NationalStrategyontheRightsofDisabledPersons.aspx
- [8] Part I, Para. 2 of the Broadcasting Act of 1 June 1991: <https://legislation.mt/eli/cap/350/eng/pdf>
- [9] https://education.gov.mt/en/elearning/Documents/Green_Paper_Digital_Literacy_v6.pdf
- [10] Constitution of Malta, <https://legislation.mt/eli/const/eng>
- [11] Broadcasting act, supra
- [12] https://education.gov.mt/en/elearning/Documents/Green_Paper_Digital_Literacy_v6.pdf
- [13] https://www.gov.mt/en/Government/DOI/Press_Releases/Pages/2021/January/28/pr210187en.aspx
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Annexe I. Country Team

First name	Last name	Position	Institution	MPM2021 CT Leader
<i>Louiselle</i>	<i>Vassallo</i>	<i>Associate Academic</i>	<i>University of Malta</i>	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 reflect the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

First name	Last name	Position	Institution
<i>Herman</i>	<i>Grech</i>	<i>Editor in Chief</i>	<i>The Times of Malta</i>
<i>Alex</i>	<i>Grech</i>	<i>Senior Lecturer</i>	<i>University of Malta 3CL - Commonwealth Centre for Connected Learning</i>
<i>Joe A.</i>	<i>Cannataci</i>	<i>Professor, Rapporteur, Chairperson</i>	<i>University of Malta, United Nations, STeP</i>
<i>Brenda</i>	<i>Murphy</i>	<i>Associate Professor</i>	<i>University of Malta</i>

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