

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 2021

Country report: Greece

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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 2021. 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 notes

Authorship and review

The CMPF partners with experienced, independent national researchers to carry out the data collection and to 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 that was developed by the CMPF.

In Greece the CMPF partnered with Lambrini Papadopoulou (National and Kapodistrian University of Athens), 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 being intertwined with the traditional media and the 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 and 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, in order 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, MPM2022 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2022, available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

- **Country overview, minorities, languages:** The total population of Greece, according to the 2011 census, is estimated to be around 10.82 million inhabitants^[1]. A new census was conducted in 2021 and although the results were not made public until the final draft of this report, unofficial data point to a further decline of the country's population. The territory comprises around 132,049 square kilometers and modern Greek is the official language spoken in the whole territory. Almost one-third of the population (35,4%) lives in the capital region of Attica. Based on the 2011 census, in Greece there are around 912,000 permanent foreign residents, including Albanians (480,851), Bulgarians (75,917), Romanians (46,524), Pakistanis (34,178), Georgians (27,407), Ukrainians (17,008) as well as smaller groups from other countries. The only officially recognized minority in Greece is the Muslim minority of Thrace, with an estimated population of 100,000 persons.
- **Political situation:** Since the 2019 elections Greece has been governed by the right-wing party of New Democracy (ND) that won 158 seats in the 300-seat Hellenic Parliament, allowing the party to form a government on its own under Prime Minister Kyriakos Mitsotakis. The Greek parliament currently is made up of six parties.^[2]
- **Economic situation:** According to the Hellenic Statistical Authority (ELSTAT) GDP for 2021 in volume terms amounted to 181 billion euro compared with 167.1 billion euros for 2020 recording an increase of 8.3%^[3]. This rise is attributed to various reasons, such as the tourist inflows over the summer that helped the economy reclaim a significant part of the previous losses due to the negative impact of the COVID-19 pandemic as well as to the significant increase in investments and net exports^[4]. The recent emergence of the Omicron variant did not seem to have a severe impact on the Gross Domestic Product (GDP) for the 4th quarter of 2021 that increased slightly by 0.4% in comparison with the 3rd quarter of 2021. Despite the increase in the GPD, the overall situation for the country's working force doesn't seem to improve much, since in December 2021 the unemployment rate in Greece was estimated at 13% and was considered to be (together with Spain) the highest in the Eurozone with the amount of jobless people amounting to 607,000^[5].
- **Media market:** According to the latest Reuters Institute for the Study of Journalism Report (2021), the media market in Greece is characterised by digital fragmentation, lack of trust in news, a politically polarized press, and one of the highest uses of social media for news. The majority of Greece's audience (89%) gets the news through online media (including social media) and only 22% replied getting the news by print outlets. 37% of the respondents said that they share news via social, messaging or email. As in most other countries trust in news increased, by four percentage points in Greece (32%). Despite the increase, Greece is still well behind most other countries in trust (38th place out of 42 countries). According to the Standard Eurobarometer 94 (Winter 2020 - 2021), the proportion of respondents reporting they watch TV on a TV set every day or almost every day is estimated at 73%, the proportion of people listening to the radio every day or almost every day has risen particularly and is estimated at 42%. Levels of trust in television were lowest in Greece (25%), whereas trust in the Internet has grown notably (54%, +12 percentage points). 60% of the respondents consider that the national media does not provide trustworthy information. Finally, regarding public media, 52% of the respondents believe that the statement that public service media are free from political pressure does "not at all" reflect the situation in their country (Eurobarometer 94, 2020-2021).

- **Regulatory environment and COVID-19:** In 2021, after a proposal of the country's Ministry of Justice, article 191 of the Greek Penal Code (Law 4855/2021) was amended, essentially allowing the Greek government to punish anyone who “publicly or via the internet spreads or disseminates in any way false news that is capable of causing concern or fear to the public or undermining public confidence in the national economy, the country's defense capacity or public health”. This amendment brought about widespread criticism not only by the opposition parties but also by journalists and international press freedom organizations. The COVID-19 crisis, together with preexisting trends, increased the professional and economic insecurity of many media professionals.

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

The situation of media pluralism and Press Freedom in Greece seems to have deteriorated during 2021 compared to the assessment made in the previous year. This is also evident in the 2021 World Press Freedom Index by Reporters without Borders, where Greece ranks 70th out of 180 countries and is down 5 places from 65 in 2020 and 4th worst in the EU^[6]. Additionally, in its report "Controlling the message. Challenges for independent reporting in Greece", Media Freedom Rapid Response (MFRR) points out that there is a suffocating climate for independent journalism in Greece^[7]. In the present report, Market Plurality scored in the high-risk category as there is a persistent lack of ownership transparency for legacy and digital media and at the same time many media face serious economic problems that essentially allow commercial interests to define their editorial policies as well as the appointments and dismissals of editors-in-chief. Moreover, out of the 20 indicators, the majority-11- reached the high-risk category. This year was characterized by various threats to journalists' physical and online safety- that escalated in April of 2021 with the killing of a veteran crime journalist-, and an amendment in the Greek Penal Code that may create a chilling effect on free speech and independent journalism. These worrying phenomena essentially create an unfavorable environment for media freedom and plurality in Greece.

While Freedom of Expression is explicitly recognised in the Greek Constitution, ensuring **Fundamental Protection** (medium risk – 52%), various worrying incidents during 2021 show that this fundamental right is not always respected in practice. One of the most worrying developments is the amendment of article 191 of the Greek Penal Code, with the Law 4855/2021 (Government Gazette 205 /A/12-11-2021), turning the spreading of fake news into a criminal offence punishable with up to five years in prison. This change is deemed problematic due to the vague definition of what constitutes fake news which could lead to various misuses against journalists who could be jailed or fined for their critical reporting. The indicator "journalistic profession, standards and protection" scored the highest risk in this domain (74%). This is mainly attributed to the –almost systematic- offline and online threats and attacks against various journalists and photojournalists.

Market Plurality exhibits by far the highest level of risk (72%). This is mainly associated with the commercial and ownership influence over the media content (83%). This high risk stems also by the absence of any mechanism that could protect journalists in the case of ownership changes or ensure that appointments and dismissals of editors-in-chief are not influenced by commercial interests. Another important issue in this area is the lack of ownership transparency for legacy and digital media.^[8] Finally, the economic problems that prohibit media from becoming viable (74%) constitute another important source of concern for media plurality.

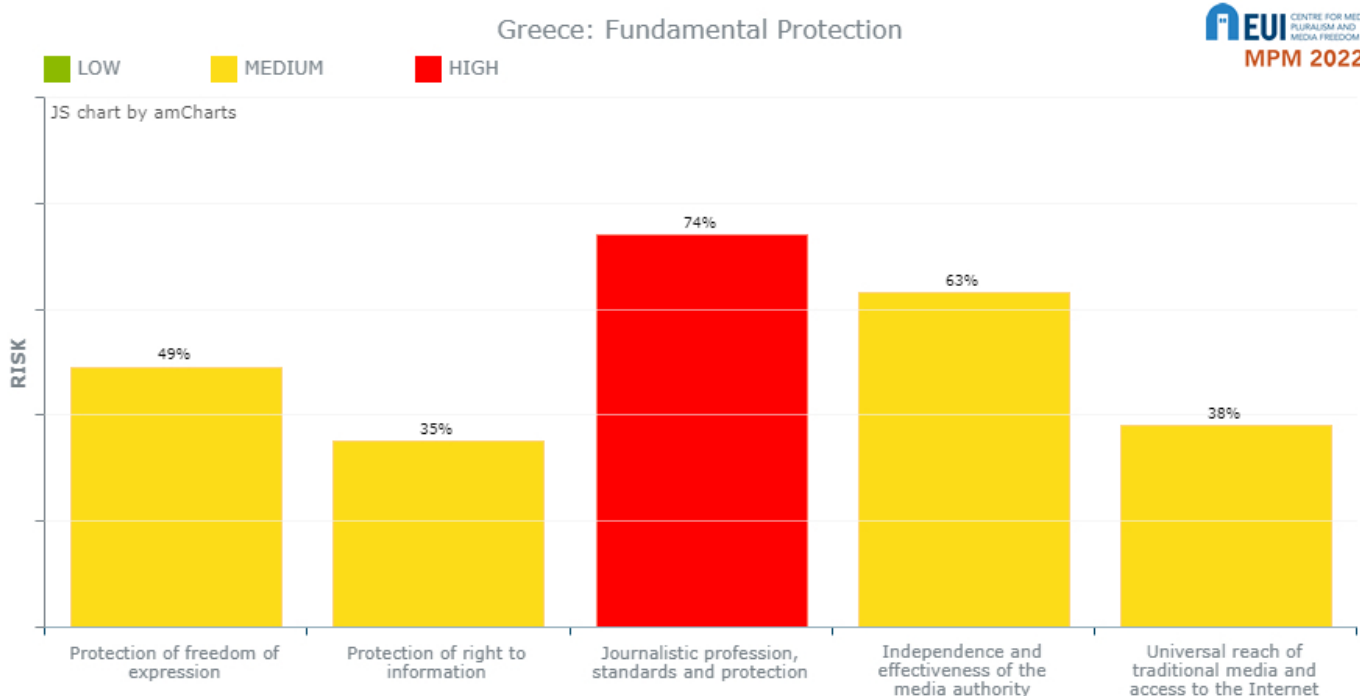
The **Political Independence** area is characterized by a medium level of risk (66%) reflecting a polarized media field that is characterized by a relationship of interdependency between political elites and media owners. The indicator 'editorial autonomy' shows the highest worrying risk score of 97% which is directly connected with the total absence of safeguards that could guarantee autonomy when appointing and dismissing editors-in-chief. The "state regulation of resources and support to the media sector" is another problematic indicator receiving a high-risk score of 67% mainly due to the lack of transparency concerning the distribution of state subsidies to media outlets during the pandemic.

The area of **Social Inclusiveness** shows a medium risk (66%). The only legally recognized minority in Greece, the Muslim minority of Thrace, does not have appropriate access to the public and private

broadcast media. The same can be argued for people with disabilities. Another indicator that is assigned a high-risk score (72%) is "access to media for women" since data show that women are heavily underrepresented in executive positions in the Greek media and there is a lack of gender balance in reporting and news content. The indicator "media literacy" is assigned a medium risk score of 46% presenting the lowest risk in this group mainly attributed to the new Greek Law 4779/2021 (20.02.2021) that constitutes a significant step towards the promotion of media literacy.

3.1. Fundamental Protection (52% - 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 the competence to regulate the media sector, and the reach of traditional media and access to the Internet.



Fundamental Protection presents a medium risk (52%) which is much higher than last year (38%). As in the previous year, all indicators present a medium risk except for "Journalism, standards and protection", which is assessed as high risk (74%), showing a high increase compared to the previous report (42%). In general, freedom of expression and the right to information are explicitly recognized in the Greek Constitution. However, a closer look at the field reveals that these rights are not always respected in practice.

The indicator **Protection of freedom of expression** is assessed with a medium risk (49%) which is much higher compared to last year (35%). Freedom of expression is explicitly recognised in the Greek Constitution (Hellenic Constitution – 1975) and specifically Art. 14(2) of the Constitution recognises the freedom of the press and prohibits censorship and any preventive measures.

Nevertheless, a closer look at Greece's media and regulatory landscape reveals that freedom of expression

is not respected in practice. First of all, Greece has still not decriminalised defamation. As a result, various journalists are constantly being threatened with defamation lawsuits that essentially have a chilling effect on investigative journalism. Most importantly, in November 2021, Greece amended article 191 of the Greek Penal Code with the Law 4855/2021 (Government Gazette 205 /A/12-11-2021) that essentially turned spreading fake news into a criminal offense punishable with up to five years in prison. This amendment was considered problematic due to the vague definition of what constitutes fake news^[10]. As a result, there is a risk of abusing the law against journalists who could even end up in prison for their critical journalism. This decision led to a wave of negative reactions that pointed out that this amendment could be used to punish anybody who criticizes government policies and may create a chilling effect on free speech and media freedom. Finally, various other incidents such as a SLAPP lawsuit against journalist Stavroula Poulimeni^[11], the state surveillance of another journalist, Stavros Malichudis^[12], or the criminal charges of conspiracy to abuse power against investigative journalist and publisher Kostas Vaxevanis and journalist Ioanna Papadakou^[13] point to the conclusion that 2021 was not a good year for Press Freedom in Greece.

The indicator **Protection of right to information** also shows a medium risk (35%) which is slightly lower compared with last year (39%). The right to information is explicitly recognised in the Greek Constitution. Specifically, Art. 5A Const. states that all persons have the right to information, as specified by law. Moreover, there are in place effective mechanisms for denials to access information. The medium risk score for this indicator is mainly influenced from the fact that although there is a legal framework to protect whistleblowers (Law 4254/2014 introduced provisions in favour of 'public interest witnesses' and some other provisions that could be viewed as offering protection to whistleblowers), this framework is not always comprehensive or effective; It should also be noted that, although EU Member States were obliged to transpose Directive 2019/1937, which includes stricter protection measures for those wishing to provide information on corruption cases, by 17 December 2021, Greece had not transposed into national law (at least not until the final draft of this report). Moreover, there don't seem to exist any awareness-raising activities. Most importantly, there have been a few cases where Greek whistleblowers were arbitrarily sanctioned^[14].

The situation of the **Journalistic profession, its standards and protection** presents a worrying high risk (74%) which is much higher than last year (42%). Despite the long existence of journalistic unions, as well as their frequent support for journalists whose work rights are being violated, it is quite common sense that they are not effective in guaranteeing editorial independence and/or respect for professional standards. In 2021, the working conditions of journalists in Greece remained generally unsatisfactory. Various media organisations resorted to arbitrary dismissals of journalists or pay cuts.. What is most worrying however is the rise in the physical threats towards journalists. In April 2021, Giorgos Karaivaz, a veteran crime journalist was shot dead outside his house. On another incident, investigative journalist and publisher, Kostas Vaxevanis who is quite critical of the government, received information about a death contract against him. Several other journalists and photo reporters were arbitrarily arrested and put in detention. Another incident concerned the alleged state surveillance of Greek journalist Malichudis. Other risks are also present: there is no anti-SLAPP framework and as a result, various high-profile businessmen use this method in an effort to shut down critical reporting.

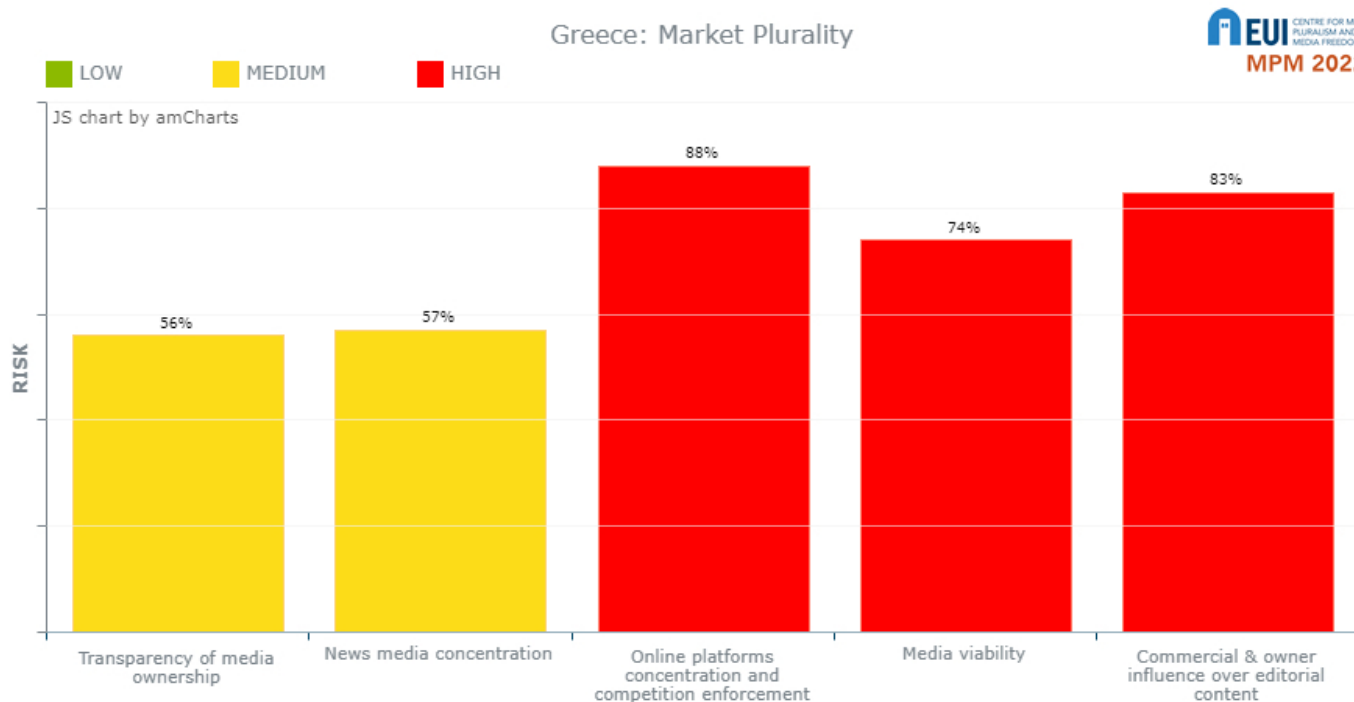
Independence and effectiveness of the media authority presents a medium risk indicator (63%) which is much higher than last year (38%). In Greece, the National Council for Radio and Television (ESR) is considered to be the main media authority in the broadcasting field. Regarding the appointment procedures for its members, although they are designed to minimize the risk of political or economic interference, in essence, they are not fully effective and cannot preclude the risk of political interference. For a long period

of time, until March 2021, the ESR board lacked two members. In addition, although the tasks and responsibilities of the media authority are defined in law, abstract legal provisions, combined with limited resources and personnel, hamper the effective discharge of the authority's monitoring duties. Finally, since 2019, official information to journalists and therefore to the public has been completely cut off. Early April 2022, ESR issued its annual report for 2020^[15]. Asked about the reasons for this significant delay in publishing the report, ESR's President said that the necessary information was not available and they had to wait until they gathered the information they needed^[16]. According to the report, in 2020, ESR issued 163 decisions.

A medium-risk score of 38% is attributed to the indicator **Universal reach of traditional media and access to the Internet which is exactly the same as last year**. Domestic legislation guarantees universal coverage of PSM, and net neutrality is overall respected. According to the EETT 2020-2021 Open Internet Report, the state of the art concerning net neutrality in Greece is overall satisfactory. In terms of transparency and end-user information, mobile providers introduced interactive "speed maps", through which the user can be informed about the speed in an area of interest to him. Finally, it should be mentioned that 87% of the population is covered by broadband^[17].

3.2. Market Plurality (72% - high risk)

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



The area of **Market Plurality** is assigned the highest risk in this report (72%) which is much higher than last year (66%). Three indicators show a high risk ("Online platforms concentration and competition enforcement", "Media viability" and "Commercial & owner influence over editorial content") whereas the last two present a medium risk ("Transparency of media ownership" and "News media concentration").

The indicator on **Transparency of media ownership** scored with medium risk – 56% presenting a slight drop from last year (59%). Although the national law contains specific provisions requiring the disclosure of ownership details in the news media sector^[18], they essentially apply to specific media and, most importantly, it is difficult to assess whether this legislation is actually respected, with public authorities receiving sufficient information. Moreover, despite the fact that ownership information should be transparent in practice, meaning that the public should have access to the actual ownership structures of media companies until their final layer, regardless of the existence of media-specific provisions, this is not at all the case in Greece. There was the first step towards this direction, i.e. according to Law 4734/2020 titled "Amendment of Law 4557/2018 (A' 139)" all Greek legal entities have to disclose details of their ultimate beneficial owners to the Central UBO Register to be created with the General Secretary of Information Systems of the Ministry of Finance, however, the platform is not accessible to the public-at least not until the final draft of this report.

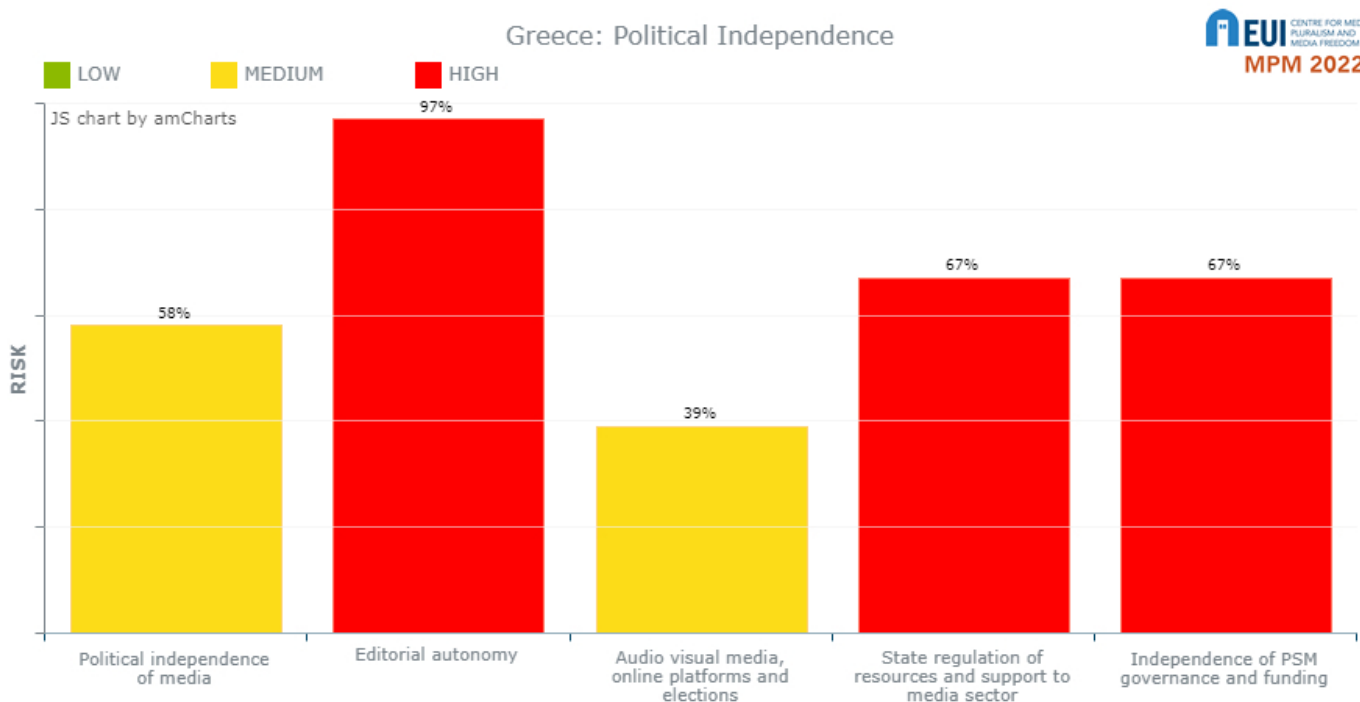
The indicator **News media concentration** also shows a medium risk of 57%, which is much higher than last year (49%), but on average lower than the risk of the main EU media markets. This can be mostly attributed to the existence of media legislation that contains specific thresholds and/or other limitations to prevent a high degree of horizontal concentration of ownership in the news media sector^[19]. Moreover, it should be noted that there are administrative authorities that oversee compliance with ownership limitations in the news media sector. Specifically, in accordance with Art. 5(12) of Law 3592/2007, the National Council for Radio and Television (ESR), which is an independent authority, is responsible for examining compliance with the ownership limitations set forth in Article 5 of Law 3592/2007. Pursuant to Article 33 of Law 4779/2021, which has transposed the Audiovisual Media Services Directive (AVMSD) ESR is competent, unless otherwise specified, for the supervision of the application of its rules and the imposition of sanctions for violations. Nevertheless, it should be pointed out that most of the legislation applies only to specific media^[20] and that there is a serious lack of official data regarding news media concentration in Greece. Another important issue that prohibits any effort of examining newspaper concentration is related to the fact that Greece's only press distribution agency -that provides the newspapers' circulation numbers-, Argos^[21], is partly owned by businessman Evangelos Marinakis, who, through the media group Alter Ego, owns major newspapers, as well as other media. Among all indicators, **Online platforms concentration and competition enforcement** is the one assessed at the highest risk (88%).- see section 4 for details.

The indicator **Media viability** is the second one to have a high risk assessment of 74% showing a slight increase compared to last year (70%). Although there is no doubt regarding the severe economic impact that the COVID-19 pandemic has had on all media organizations in Greece, it is difficult to assess the real risks in this domain due to the lack of precise data for the revenues in different media sectors. Based on the data provided by Media Services upon request, advertising expenditure for the audiovisual, radio and newspaper sectors remained stationary. Similarly, it is difficult to assess whether the number of employed journalists increased or decreased over the past year. Based, however, on the numerous announcements made by ESIEA (the largest journalistic union) condemning the dismissals of journalists, it is safe to say that 2021 was not, once again, a good year for media professionals working in Greece. The pandemic seems to have impacted severely especially those journalists that work as freelancers.

Finally, high risk (83%) is scored also for the indicator **commercial and owner influence over editorial content** presenting a sharp rise compared to last year (70%). Indeed, various studies have long pointed out the close relationship between media owners and commercial interests as well as the great influence that commercial interests have on media. For instance, as Papathanassopoulos et al. (2021: 190) argue, there have been cases where media houses have experienced boycotts or pressures because of their reporting. This high risk stems also by the absence of any mechanism that could protect journalists in the case of the changes of ownership or ensure that appointments and dismissals of editors-in-chief are not influenced by commercial interests. Bearing this in mind, it is easy to understand whether journalists can protect themselves from commercial interests. Although self-regulatory measures are in place ^[22], they are not effectively implemented.

3.3. Political Independence (66% - 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 the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



The area of **Political Independence** is assigned a medium risk (66%) which is higher than last year (57%). Greek media have had traditionally a symbiotic relationship with political power and this is depicted in the majority of the indicators that show a high risk ("Editorial Autonomy", "State regulation of resources and support to media sector" and "Independence of PSM governance and funding"). The rest of the indicators show a medium risk ("Political independence of media" and "Audiovisual media, online platforms and elections").

The indicator **Political independence of media** shows a medium risk score of 58% (lower than last year 72%) which could be attributed to the fact that the Constitution (Article 57(1)(c)) prevents the members of

Parliament from directly owning certain media types. Nevertheless, there are no provisions limiting indirect control (e.g. through the use of intermediaries). Moreover, there are various occasional cases of indirect political control over the country's media. A strand of literature has long recorded the existence of a relationship of interdependency between political elites and media owners in Greece. This results in the creation of a clientelistic relationship since media moguls use their media power to pressure the government and maximize their profits in other markets and the government itself offers favors to media moguls in exchange for favourable coverage (e.g. Papathanassopoulos et al., 2021, Leandros, 2010, Papadopoulou, 2019). A recent report by Media Freedom Rapid Response (MFRR) also points out that there has been a deterioration of press freedom since Nea Dimokratia's electoral victory in 2019, as the party is "obsessed with controlling the message" and minimising critical and dissenting voices^[23] Finally, another important issue, has to do with the news agencies in Greece. The only news agency active in Greece is the Athens-Macedonian News Agency (ANAMPA), and functions under the "direct control of the State" (Articles 28(4) and 21(1) of Law 4622/2019).

The indicator **Editorial autonomy** has a worrying high-risk score of 97%, which is much higher than last year (75%). This elevated score could be attributed to the complete absence of safeguards that could guarantee autonomy when appointing and dismissing editors-in-chief. In essence, editors-in-chief are aware that they must follow a specific editorial policy fostering political clientelism and at the same time aiming at profits in a highly competitive media ecology, or else, they are most likely to lose their place. This is also the case for the country's PSM, where it is not uncommon for appointments to be politically motivated. At the same time, self-regulation is essentially limited to the level of journalists' trade unions that have devised their own regulatory rules (i.e. the Code of Conduct of the Journalistic Profession) and are responsible for sanctioning their members in case of violations. However, since the unions' remit applies only to members, the effectiveness of the mechanism of journalists' self-regulation is in practice limited. Moreover, research suggests that unions lack credibility and the capacity to carry out their role (Siapera et al., 2015).

A medium-risk score of 35% is given to the indicator **Audiovisual media, online platforms and elections** which seems to have remained more or less to the same level as last year (39%). Although there are rules aiming at impartiality in news and informative programmes on PSM channels and service (e.g. Law 4173/2013), there are still various issues that raise concerns. For instance, in February 2021, public TV channels were ordered not to broadcast video circulating on social media that showed the prime minister disregarding lockdown rules^[24]. As regards practice in terms of the representation of political actors and political viewpoints in PSM's news and informative programmes, recent data point to a quite disturbing conclusion; According to Greece's media authority (ESR) latest report^[25], in 2020 Greece's PSM seems to have devoted 55,3% of its airtime to the party of New Democracy, 16,7% to the government, 16,7% to the main opposition party and 11,2% to the rest of the opposition parties. According to the same available data, Greece's tv stations (ERT included) dedicated 61.7% of their air time to the party of New Democracy, 13,1% to the government, 16,2% to the official opposition party (SYRIZA) and the time left to the rest opposition parties. Access to airtime on private channels and services for political actors during election campaigns is guaranteed by state regulation (eg Art. 15(2) of the Constitution and Presidential Decree 26/2012). According to the same report, during the 2019 elections, Greece's tv stations (ERT included) dedicated 39,8% of their air time to the party of New Democracy, 31,53% to SYRIZA and 20,54% to the rest of the parties.

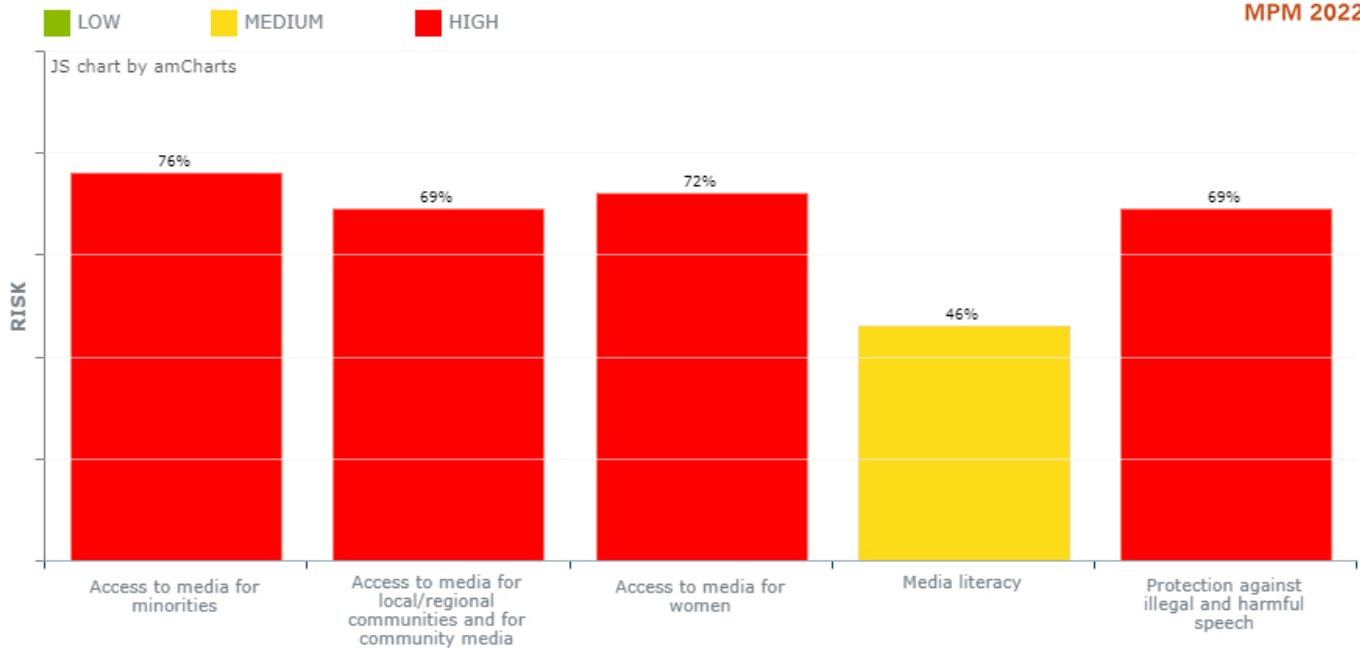
The indicator **State regulation of resources and support to the media sector** receives a high-risk score of 67%, much higher compared to last year (33%), mainly due to the lack of transparency concerning the distribution of state subsidies to media outlets during the pandemic. Specifically, the Greek government

allocated €20 million to media outlets for them to carry “Stay at Home” public health messages. It outsourced the distribution of these funds to a private media buying company, thereby bypassing its obligation to make public all transactions conducted by the state, as well as the Online Media Registry. As mentioned in a CoE alert, “An analysis showed that many outlets perceived as “opposition” media in Greece received disproportionately lower levels of advertising revenue from the public health awareness campaign compared to more government-friendly media, despite the fact that many had higher circulation and readership. As the clearest example, Documento, a weekly investigative newspaper, was excluded entirely from state funding. Its editor and publisher alleged this was in a clear retaliation for its critical coverage and recent investigations into the leadership of the ruling New Democracy party”^[26].

The last indicator on the **Independence of PSM governance and funding** has a high-risk score of 67% showing no change from last year. For the most part, the risk in this area has to do with the lack of safeguards concerning appointment procedures in ERT’s management and board positions. Although the law foresees that ERT’s President and Managing Director are selected on the basis of certain qualifications and professional expertise following an open call for applications (Law 4173/2013) what actually happens in practice is quite different. According to common practice, the president and the managing director resign after each election which leads to a change in the governing party. This was the case also after the most recent elections (July 2019) which brought New Democracy into Government. It should be also noted that ERT’s new president is the former manager of the Press Office of New Democracy^[27]. As regards funding, ERT enjoys financial autonomy (Art. 1(3) of Law 4173/2013 as in force). It derives revenue through a mandatory license fee, advertising and other sources (Art 6(2) of Law 4173/2013). The license fee, currently set at €3 per month, is levied on electricity bills (Art 6(2) of Law 4173/2013).

3.4. Social Inclusiveness (66% - 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. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against illegal and harmful speech.



The area of **Social Inclusiveness** presents a medium risk of 66% which is slightly increased from last year (63%). Two indicators remained at the same level as last year ("Access to media for minorities" and "Media literacy"), one showed a slight decrease ("Access to media for women") while the rest increased ("Access to media for local/regional communities and for community media" and "Protection against illegal and harmful speech") compared with last year. With the exception of "Media Literacy", the rest of the indicators within this area present high-risk scores. This suggests that **Social Inclusiveness** is a highly problematic issue that deserves much more attention and specific initiatives aiming to improve the access to media by specific groups in society.

The indicator **Access to media for minorities** is assigned a high-risk score of 76% just like last year. The only legally recognized minority in Greece is the Muslim minority of Thrace, whose population is mainly located in the region of Western Thrace. The law governing the operation of the Public Service Broadcaster, ERT SA, stipulates that ERT shall broadcast topics/themes that contribute to the protection of minorities (Article 3(2) of Law 4173/2013)^[28]. Yet, there are no specific provisions guaranteeing the access of the Muslim minority of Thrace to airtime on ERT's channels and services. Moreover, ERT's TV channels do not feature news, informative or current affairs programmes in any of the languages spoken by the Muslim minority of Thrace. The Muslim minority has access to national news bulletins in Turkish through ERT's international radio service, the Voice of Greece, which is, however, very limited (in time). With regards to minorities, which are not recognised by law, domestic legislation does not explicitly foresee access to airtime on PSM^[29]. Another aspect of this indicator is concerned with the issue of access to media content by people with disabilities. Policy in this area is still underdeveloped in Greece. Article 10 of Law 4779/2021 focuses on the accessibility of audiovisual media services to persons with disabilities. According to para 1 of article 10, the audiovisual media services providers should continuously and progressively increase the accessibility of their services to persons with disabilities using subtitling, sign language, audio description, and oral subtitling. Thus, the provision of audio description is foreseen by the abovementioned law. But, while it is foreseen, the providers do not fully offer it^[30].

The indicator **Access to media for local/regional communities and for community media** shows a high risk of 69% which is a bit higher than last year (63%) The state supports regional/local media with a limited number of subsidies (Art 68(4) of Law 2065/1992^[31] in conjunction with Art 2 of Law 3548/2007 and Ministerial

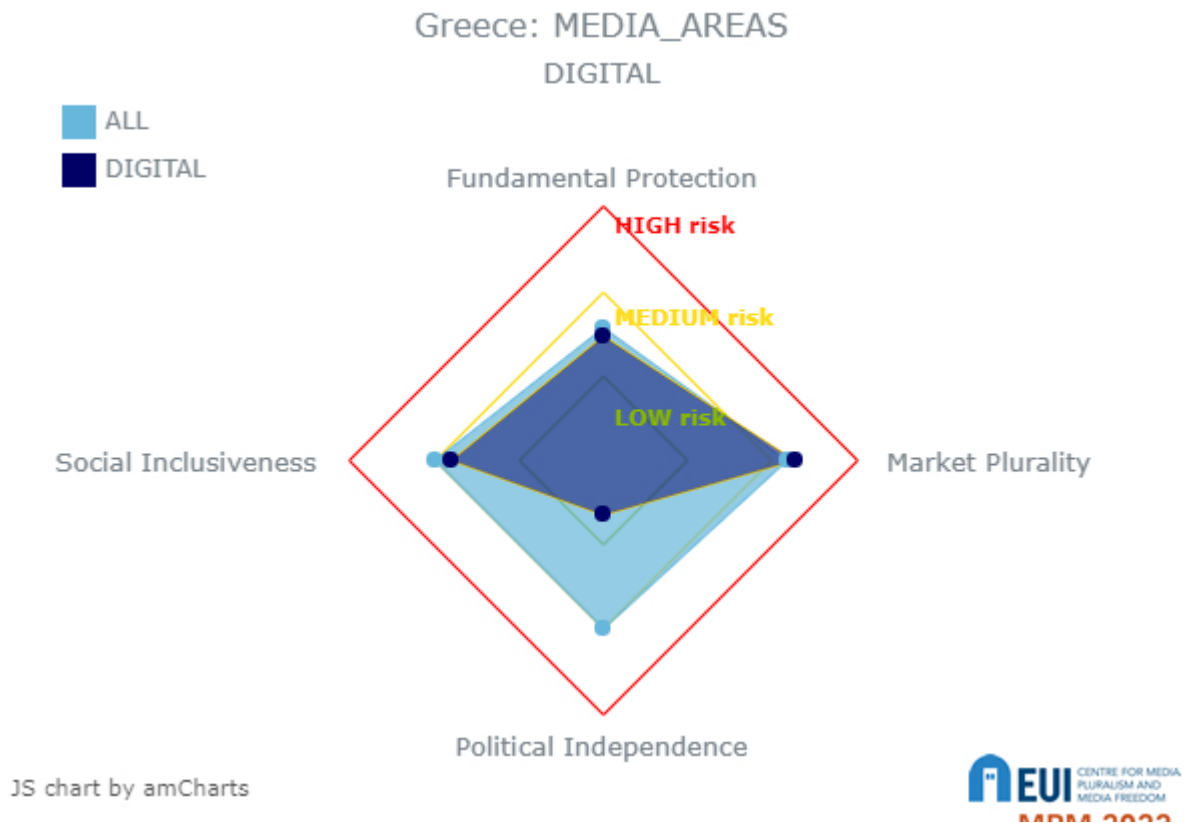
Decision 16682/2011) through reduced postal service rates. In order to be eligible for the reduced postal service rates, daily and weekly local and regional newspapers should fulfil a set of quite fair criteria^[31]. What increases the risk for this indicator is the fact that Greek media law does not contain specific provisions on community media. Community media, i.e. media that is non-profit, open and accountable to its community is not recognized as a distinct media group alongside private and public service media despite their important contribution in enhancing pluralism and democracy (Papadopoulou, 2020).

The indicator **Access to media for women** is assigned a high-risk score of 72% showing a slight decline from last year (74%) but still reflecting the persistent under-representation of women in executive positions and on management boards. ERT's Staff Rules (Arts 5(1) and 5(2)) include a commitment to the principles of equality in personnel selection and appointment in accordance with domestic legislation. However, no other specific policies and measures aimed at promoting gender equality with respect to equal pay, personnel selection, appointment and career progression have been adopted. Moreover, the executive positions in ERT's management board (i.e. that of the President and of the Managing Director) are occupied by men. Despite progress in recent years, recent research has shown a complete lack of formal rules regarding gender balance in reporting and news content (Papathanassopoulos et al., 2021:196). The representation of women in news, especially in right-wing outlets, remains extremely stereotyped and even insulting in some instances (Siapera and Papadopoulou, 2021).

The indicator **Media literacy** is assigned a medium risk score of 46%, just like last year, presenting the lowest risk in this group. This is mainly attributed to the new Greek Law 4779/2021 (20.02.2021) which addresses the implementation of the reformed Audiovisual Media Services Directive AVMSD 2018/1808 and constitutes a significant step towards the promotion of media literacy. Media literacy is apparent in several actors and governmental bodies, not in an explicit way but rather a latent one. It is not included in the education curriculum as a separate autonomous subject/course/unit of study^[32], however, the subject of media literacy is widespread in non-formal education with several media literacy initiatives taking place in different settings.

The final indicator **Protection against illegal and harmful speech** is assigned a high-risk score of 69% showing a sharp increase, compared with last year (56%). Greece is one of the most vulnerable countries in Europe to misinformation and fake news, according to the Media Literacy Index 2021. Specifically, it is in the 27th place among 35 countries and is included in the 4th worst of the 5 ranking groups, together with Turkey and other Balkan countries. Regarding the existence of a fact-checking mechanism that could counter disinformation, there is currently one, ellinikahoaxes.gr, that works in partnership with Facebook but has received wide criticism on various occasions^[33]. For the digital dimensions of this indicator, please see section 4.

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



Fundamental Protection: 49%

In Greece, there is no separate law that specifically regulates freedom of expression online, however, Art. 14(1) of the Greek Constitution that regulates freedom of expression applies to the online environment as well. Recent data nevertheless show that during 2021 various cases of arbitrary restrictions of freedom of expression online as well as threats to the online safety of journalists took place. Specifically, Facebook censored and blocked content and various users commenting on the hunger strike of convicted terrorist Dimitris Koufodinas^[34]. In another instance, according to various reports, the government's National Intelligence Service (EYP) had secretly been conducting monitoring of a Greek journalist^[35]. Furthermore, a female Dutch freelance correspondent, revealed fears for her safety after she experienced an aggressive smear campaign online^[36]. As regards net neutrality, according to the EETT 2020-2021 Open Internet Report, the state of the art concerning Greece is overall satisfactory. In particular, the report states, among others, that full implementation of the provisions of the National Open Internet Regulation during the period reference 2020-2021 contributed to the increase of interest on the part of end-users for speed control, as it is linked to the possibility of claiming compensation, in case actual speed deviates from the speed specified in the terms of the contract.

Market Plurality: 75%

All indicators in this area, with the exception of media viability, show a high risk in the digital dimension. For starters, transparency of online media ownership constitutes a controversial issue for Greece. On the one hand the General Secretariat of Information and Communication maintains a Registry of Online News Media (art. 52 of Law 4339/2015) with information on their ownership status (art. 53(1) of Law 4339/2015) but on the other, there are no sanctions for the provision of inaccurate information nor for the non-compliance with media ownership disclosure obligations when applying for registration. Furthermore, none of this information is available to the wider public. What is most important is that digital native media do not come within the

scope of the provisions of Law 3592/2007 to prevent a high degree of horizontal concentration of ownership. Concentration in digital native media markets is examined in accordance with the provisions of general competition law (Law 3959/2011)^[37]. No new or updated competition tools deal with the specificities of digital news media markets^[38]. Data on the market shares of the top 4 news media owners across different media markets is not publicly available. However, it should be pointed out that previous research has shown that there is a great percentage of cross-media concentration in the Greek media ecosystem. Another important issue is the significant role of intermediaries in the distribution of news. According to the available data^[39], 89% of the users accessed news online in 2021; more than two-thirds accessed news online via social media. While there are no data regarding digital media's revenue, the expenditure for advertising during 2021 has remained stationary. As a result, it is safe to assume that the risk for concentration is higher - due to the lack of legal provisions, and to the platforms' dominance in the advertising market and in the market of access to the news. Regarding the relationship between platforms and publishers in Greece, it should be pointed out that the directive 2019/790 has not been transposed neither there is any other measure to promote publishers' remuneration by the digital platforms. Finally, with regards to new funding sources, as pointed out in various studies, in order to survive, media organizations need to transform, show flexibility, entrepreneurial attitudes, and develop a strategic business model that will effectively address new challenges (Leandros and Papadopoulou, 2020). In recent years, there have been various efforts by outlets to develop alternative funding sources (Papadopoulou, 2020).

Political Independence: 21%

As pointed out earlier in the report, political influence over legacy media in Greece is generally indirect and is based on the shared interests between the owners of media outlets and political parties. The same situation applies in the digital media field as well. Moreover, it should be pointed out that it is quite difficult to actually paint the whole picture since it is estimated that there are more than 10,000 websites and blogs in Greece and only 1,137 are currently certified by the Secretariat of Information and Communications (Papathanassopoulos et al., 2021). Regarding the issue of transparency of political advertising on online platforms during electoral campaign, domestic legislation does not contain provisions explicitly mandating national political parties to make available on their websites information on their expenditure on online and social media activities, or information on targeting criteria used in the dissemination of social media advertisements. Yet, political parties which get public financing are required to publish a detailed list of their campaign expenses within three months after the parliamentary and European Parliament elections (16(6) of Law 3023/2002). Some political parties explicitly include information on the amounts spent on social media advertising on their website.

Social Inclusiveness: 60%

As mentioned previously in the report, disinformation is widely spread in the country, a fact proven by the latest Media Literacy Index 2021 that places Greece in the 4th worst place of the 5 ranking groups, together with Turkey and other Balkan countries^[40]. What makes things worse is the absence of a strong and reliable fact-checking mechanism that could counter fake news. At the same time, Greece has recently (November 11, 2021) amended Article 191 of the Penal Code that penalizes the dissemination of false news. The new article provides that 'Anyone who publicly or via the internet spreads or disseminates in any way false news that is capable of causing concern or fear to the public or undermining public confidence in the national economy, the country's defense capacity or public health shall be punished by imprisonment of at least three (3) months and a fine. If the act was repeatedly committed through the press or via the internet, the perpetrator is punished with imprisonment of at least six (6) months and a fine. The owner or issuer of the medium with which the acts of the previous paragraphs were performed shall be punished with the same penalty'. This amendment, according to various lawyers, journalists and press freedom organisations,

cannot be considered a step forward, since it essentially grants regulators or prosecutors the power to decide true from false and levy punitive fines. As a result, it could potentially restrict freedom of expression. As regards online hate speech, Greece has transposed the Audiovisual Media Services Directive (AVMSD) in part A of Law 4779/2021, which introduces inter alia measures to protect the general public from programs containing incitement to violence or hatred directed against a group of persons. There are numerous indications that hate speech toward ethnic or religious minorities on social media is an issue in Greece^[41]. However, there are no official data to enable an assessment of whether efforts to remove hate speech from social media have been effective. Finally, the percentage of the population that has basic or above basic overall digital skills in the country is estimated at 51% whereas the percentage of the population that has low overall digital skills in the country, which is not a desirable state of play, is estimated at 24%^[42].

5. Conclusions

The MPM2022 results for Greece show that out of the four dimensions of media pluralism that are part of this assessment, the biggest risks are tied to the situation of **Market Plurality**. This is not to be interpreted though as if the rest of the dimensions, namely **Fundamental Protection**, **Political Independence** and **Social Inclusiveness**, are not facing significant challenges. On the contrary, just as it has been highlighted in the previous editions of MPM, the same ongoing problems such as the lack of ownership transparency for both offline and online media, the limitations of editorial autonomy, the precariousness of journalistic work and the interdependency between media and political elites continue to persist, leading to an unfavorable environment for press freedom and plurality. This suffocating climate for journalism is reflected in a report by Media Freedom Rapid Response (MFRR) ^[43] which traces the beginnings of the deteriorating situation of press freedom in Greece in 2019, when New Democracy won the elections and revealed its obsession with controlling the message and limiting critical and dissenting voices. This deterioration is also reflected in the Global Press Freedom Index of Reporters Without Borders (RSF) for 2021, which ranks Greece 70th out of 180 countries (five places lower than in 2020).

During the pandemic crisis, various governments used the COVID 19 crisis as a pretext to push through restrictions that hamper critical journalism (Papadopoulou and Maniou, 2021). That was also the case in Greece, where the government amended article 191 of the Greek Penal Code with the Law 4855/2021 (Government Gazette 205 /A/12-11-2021). This decision, together with the various SLAPP lawsuits and the fact that defamation is still not decriminalized, has a severe impact on free speech and media freedom. A significant number of all these obstacles and challenges could be efficiently confronted by a more vigorous legislative action at the national level.

Specifically, several risks pertain to **Fundamental Protection** [52%- MEDIUM RISK] and could be addressed with the following measures:

- Decriminalization of defamation.
- Amendment of article 191 of the Greek Penal Code on “fake news”.
- Strong anti-SLAPP framework.
- Increase the resources and personnel of the media authority.
- Introduce measures to protect freedom of expression online as well as journalists’ online safety.

Market Plurality is the area with the highest risk in this assessment [72%- HIGH RISK]. For the challenges in this area, the following policy recommendations are suggested.

- Introduce specific and severe sanctions for those offline and online media that fail to disclose their ownership. These data should be open to the public in a comprehensive manner
- Completely redefine and simplify anti-concentration laws for both offline and online media
- Secure the independence of media outlets from market forces and political elites.

- Enhance and support alternative media.

Risks concerning **Political Independence** (66%-MEDIUM RISK) of media are also quite worrisome. Some of the challenges could be tackled following specific policy recommendations.

- Safeguard PBS' autonomy and impartiality by changing the appointment procedures for the management and board positions to ensure their political independence.
- Enhance the transparency and fair distribution of state subsidies to media outlets
- Enhancement of previous, or creation of new monitoring bodies that could include all media professionals and safeguard their independence

Social Inclusiveness (66%- MEDIUM RISK) is also facing various risks. To address them, the following measures could be implemented.

- Introduce measures to improve the access of minorities and local communities to media (for example, by adopting special provisions to ensure that Greek media will broadcast programs in any of the languages spoken)
- Legal recognition and financial support for community media
- Address gender stereotypes (for example by strengthening self-regulatory mechanisms and codes of conduct that condemn and combat gender stereotypes in the media)
- Introduce a monitoring body that could systematically work on fighting disinformation

6. Notes

- [1] ELSTAT (2011)
- [2] <https://www.hellenicparliament.gr/en/news/links/political-parties/>
- [3] ELSTAT (2022)
- [4] <https://www.ertnews.gr/eidiseis/oikonomia/ischyroteri-apodeiknyetai-i-megethynsi-toy-aep-gia-to-2021-etrexe-me-rythmo-8-3-i-elliniki-oikonomia/>
- [5] Eurostat (2022)
- [6] RSF (2021)
- [7] MFRR (2022)
- [8] Leandros, 2011; Papathanasopoulos et al, 2021
- [9] Leandros, 2011; Papathanasopoulos et al, 2021
- [10] The new article defines fake news as news that is “capable of causing concern or fear to the public or undermining public confidence in the national economy, the country’s defense capacity or public health”. According to various press freedom organisations, there is a serious risk that the provision could be used to punish anybody who criticizes or takes issue with government policies.
- [11] <https://www.ecpmf.eu/slapp-lawsuit-in-greece-underscores-need-for-swift-eu-directive/>
- [12] <https://www.investigate-europe.eu/en/2021/stavros-malichudis-journalist-being-watched-by-the-greeksecret-service-press-freedom/>
- [13] <https://ipi.media/greece-concern-over-criminal-charges-against-investigative-reporters/>
- [14] [13] <https://www.tovima.gr/2018/02/16/politics/abramopoylos-gia-novartis-minysi-kata-dyoprostateyomenwn-martyrwn/> , <https://www.lifo.gr/now/politics/yphthesi-novartis-minysi-loberdoy-kataprostateyomenoy-martyra>
- [15] <https://www.esr.gr/to-esr/ekthesεις-πεπραγμένων/>
- [16] <https://www.in.gr/2022/05/06/greece/o-proedros-tou-esr-dilonei-pos-o-tiletheatis-thelei-na-vlepeiskoupidia-den-ton-prostateyoi-kanenan-kratos/>
- [17] <https://digital-strategy.ec.europa.eu/en/policies/desi-greece>
- [18] For instance, Art. 14(9) of the Constitution states that “the ownership status, the financial condition and the financing means of the information media shall be disclosed, as specified by law”. It also mandates national legislation to designate “the measures and restrictions necessary for fully ensuring transparency and plurality in information”.
- [19] For instance, Law 3592/2007, Law 4339/2015 and Law 4512/2018.
- [20] Digital native media do not come within the scope of the provisions of Law 3592/2007 to prevent a high degree of horizontal concentration of ownership. Concentration in digital native media markets is examined in accordance with the provisions of general competition law (Law 3959/2011).
- [21] Argos was also sanctioned by the Hellenic Competition Commission <https://www.epant.gr/enimerosi/de-Itia-typou/item/1288-deltio-typou-apofasi-epi-tou-elegxou-symmorfosis-tis-etairias-argos.html>
- [22] Journalists’ self-regulatory code (the Code of Journalists’ Professional, Ethical and Social Responsibility, adopted, in May 1998.
- [23] <https://www.mfrr.eu/tag/greece/>
- [24] <https://rsf.org/en/greece>
- [25] <https://www.esr.gr/to-esr/ekthesεις-πεπραγμένων/>
- [26] CoE (2020)

- [27] Moreover, it should be also noted that one of the first decisions of the new Greek government, after the national elections of 7.7.2019, was to place directly under the Prime Minister's supervision the General Secretariat of Information and Communication, which is responsible for the supervision of the Media, the Public Radio and Television (ERT) and the Athens - Macedonian News Agency ("Athens News Agency - Macedonian Press Agency"). (Articles 28(4) and 21(1) of Law 4622/2019)
- [28] Also, broadcast media law stipulates that ethnic and religious minority groups should be respected in news and other journalistic and political programmes (Art. 4(2) of Presidential Decree 77/2003).
- [29] PSM radio offers short news bulletins in Arabic for refugees/immigrants. ERT's international radio service, the Voice of Greece, offers national news bulletins in languages spoken by large immigrant communities (such as Albanian, Russian or Polish, Turkish) on a daily basis.
- [30] During the COVID 19 pandemic, the Prime Minister communicated with the citizens through televised addresses. While the televised address was offered with a simultaneous interpretation to the Greek sign language, the option of subtitling wasn't available.
- [31] For instance, they should be registered with the Online Regional and Local Media Registry maintained by the General Secretariat for Information and Communication (Art 68(4) of Law 2065/1992 in conjunction with Art 2 of Law 3548/2007 and Ministerial Decision 16682/2011).
- [32] It should be noted though that the Institute of Educational Policy (IEP), consultative body of the Ministry of Education offers for the school year 2021-2022 the new Platform 21 Skills Labs scheme, as a compulsory unit from pre-school to secondary level education to be taught in the classroom. Among the themes that one can choose are media literacy.
- [33] For instance, ESIEA issued a statement supporting journalists who were protesting against the excessive and unfair negative evaluation they received from ellinikahoaxes, pointing out the need for a strong, reliable and impartial fact checking mechanism. <https://www.esiea.gr/anagkaios-enas-isxyros-kai-thorakisme/>
- [34] Actually, various Greek journalists filed for precautionary measures against Facebook on the grounds of censorship arguing that the platform had systematically blocked their posts.
- [35] IPI (2021).
- [36] IPI (2021b)
- [37] see Decision 700/2020 of the Hellenic Competition Commission, <https://epant.gr/apofaseis-gnomotiseis/item/1084-apofasi-700-2020.html>).
- [38] Note that Directive 2019/790 has not yet been transposed, although the deadline for transposition of the DSM Directive expired on June 7, 2021 (Article 29 of the Directive).
- [39] Reuters Institute for the Study of Journalism (2021)
- [40] https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021_ENG.pdf
- [41] For instance in their study, Sachinis, Tsirmpas and Zirganou-Kazolea (2021) found that hate speech is far from a marginal phenomenon within the Greek digital sphere, with nationalism and sexism being the most prominent categories employed.
- [42] https://ec.europa.eu/eurostat/databrowser/view/ISOC_SK_DSKL_I/default/table?lang=en
- [43] <https://www.mfrr.eu/tag/greece/>

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who were available for expert interviews or/and greatly helped the country team with their expertise.

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 CT Leader
<i>Lambrini</i>	<i>Papadopoulou</i>	<i>Assistant Professor</i>	<i>National and Kapodistrian University of Athens</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 that make up the MPM2022. Consulting the point of view of recognized experts was aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as being 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>Giannis</i>	<i>Kotsifos</i>	<i>Director</i>	<i>Journalists' Union of Macedonia and Thrace Daily Newspapers (ESIEMTH)</i>
<i>Maria</i>	<i>Skagou</i>	<i>Head of Legal & External Affairs</i>	<i>Vodafone Greece</i>
<i>George</i>	<i>Pleios</i>	<i>Member/Head of the Department of Communication and Media Studies</i>	<i>National Council for Radio and Television & University of Athens</i>
<i>Nikos</i>	<i>Leandros</i>	<i>Professor</i>	<i>Panteion University of Social and Political Sciences</i>
<i>Elpida</i>	<i>Vamvaka</i>	<i>Director</i>	<i>Homo Digitalis</i>

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