

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: Hungary

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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 Hungary the CMPF partnered with Attila Bátorfy and Krisztián Szabó (Eötvös Loránd University, Media Department), Konrad Bleyer-simon (European University Institute), Eszter Galambosi (independent researcher), 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 Annex 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

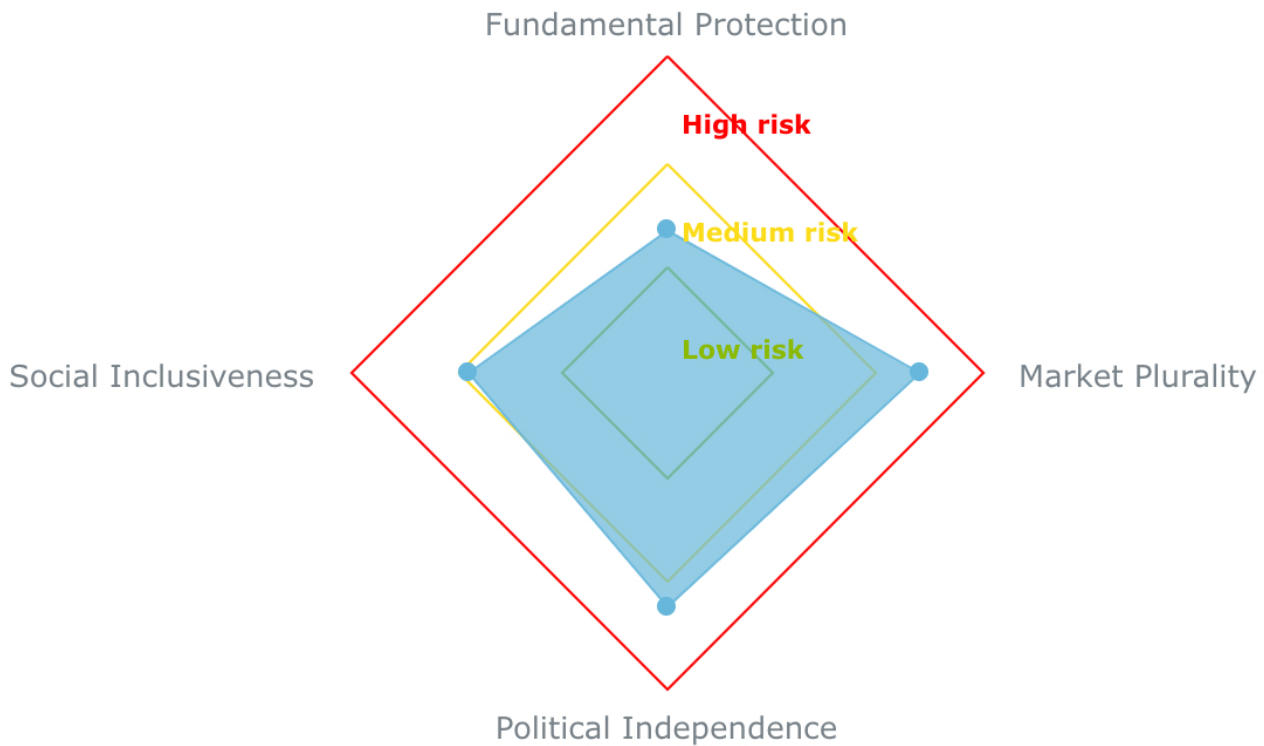
- **Population.** According to the last national census of 2011 (HCSO 2012), Hungary had a population of 9,985,000, but for 2021 it decreased to 9,730,000 (for the year 2022, it is projected to be 9,689,000) (HCSO, 2022).
- **Languages.** Hungary is mostly a monolingual country, 99% of the population speaking Hungarian.
- **Minorities.** From an ethnic point of view, the country is mostly homogeneous. According to the census of 2011, 16% of the respondents claimed to be from other ethnicities than Hungarian. Act CLXXIX of 2011 on the rights of nationalities lists 13 acknowledged nationalities in Hungary: Armenian, Bulgarian, Croatian, German, Greek, Polish, Roma, Romanian, Ruthenian, Serbian, Slovak, Slovene and Ukrainian. The largest ethnic minority is the Roma, estimated as 3.1% of the total population (HCSO 2014).
- **Economic situation.** According to the European Commission's Winter 2022 Economic forecast for Hungary GDP was estimated to have expanded by 6.5% in 2021. The IMF estimates Hungary's 2021 GDP at USD 180.96 billion and the GDP per capita at USD 18,530 (IMF, 2022).
- **Political situation.** Hungary is a parliamentary democracy. Since 2010 the right-wing/populist Fidesz-KDNP (Alliance of Young Democrats- Christian Democratic People's Party) coalition is in power winning four national elections consecutively in 2010, 2014, 2018, and 2022. In all four cases, the government gained a two-thirds majority in parliament. Following a set of primaries in 2021, most opposition parties formed a united front for the April 2022 national election. While some polls in late 2021 predicted a close race, Fidesz won another 2/3 majority on 3 April 2022. In addition, the extreme far-right, anti-vaxxer Our Homeland Movement (Mi Hazánk Mozgalom, a party that is on many topics supportive of Orbán's government) has also managed to pass the 5% threshold and thus got its own group in parliament. A 2021 research has shown that Hungary was the EU member state with the lowest percentage of female members of parliament (Qubit, 2021), the 2022 parliamentary election didn't bring significant change in this area.
- **Media market.** The Hungarian media market consists of a mix of public and private media and increasing local ownership influenced by the government. The market used to be characterised by a high level of political parallelism, party-colonisation and instrumentalisation according to the duopolistic political economy of the right and the left. As the political right gained significant power in the past years, it is better to say that most of the market actors, even privately-owned, formally independent outlets are controlled largely by the government, and not by different parties, or business interests. Trust in news media and journalism is among the lowest in Europe (DNR, 2021); the audience is polarised, meaning that it tends to trust only those news outlets that serve their political/ideological positions (Mérték-Medián 2021). The internet penetration is high at 90,1% (Statista, 2021), and the proportion of regular internet users is 75% (HCSO 2018), which is 8% lower than the EU27 average. Online media and social media intermediaries are the most important information sources, but television still plays a key role in the news ecosystem (DNR 2021). Hungary's internet users are using mostly Facebook: 5.4 million Facebook, 2.88 million Instagram users (Statista, 2021); other social media platforms, such as Twitter or Tiktok, are not commonly used.
- **Regulatory environment.** The Hungarian media's main regulatory body is the National Media and Info-communications Authority (NMHH) guarding over the rights and stipulations laid down in Act CLXXXV

of 2010 on Media Services and on the Mass Media. The Audiovisual Media Services Directive (AVMSD) was transposed into Hungarian law through Act LXIII of 2019 (amending certain laws relating to media services) and Act XXIV of 2020 (on the Amendment of the E-Commerce Act CVIII 2001).

- **COVID-19.** Hungary was one of the countries hardest hit by the pandemic, the number of deaths surpassed 45,000 in April 2022 (4672 deaths per million by 19 April 2022, the 4th highest number in the world and second highest in the EU, after Bulgaria, according to Statista, 2022). In the year 2020, many outlets were affected by a COVID-19-related decline in advertising, most of them have recovered by the year 2021. The government did not provide subsidies to news media in the context of the pandemic. COVID-19 disinformation was widespread in the country, like in most other European countries.
- **Russian aggression in Ukraine.** In a press release, the NMHH (2022) announced that it will enforce the EU's ban of the two Russian government-run disinformation channels RT and Sputnik. The NMHH made sure that the only Hungarian broadcast provider that included RT (Russia Today) in its television packages discontinued the service. At the same time, Russian disinformation was shared on Hungarian blogs, news websites, television stations, and even the PSM (Szebeni, 2022, Németh, 2022). During the election campaign, both the narrative of government members and news outlets included fabricated statements that the Hungarian opposition was aiming for involvement in the war in Ukraine and that Ukrainian president Volodymyr Zelenskyy was trying to influence the Hungarian election (Balint, 2022). In relation to the war, Government Decree 180/2022 announced a state of emergency in Hungary, starting from June 2022. Not much later, the government adopted Decree 210/2022, the Regulation on emergency rules for the distribution of press products. This regulation provides indirect support to newspaper vendors in case they only sell press products that publish the government's official messaging in relation to emergency. As state advertisements and government announcements often contain messages that are highly biased toward the ruling party, and state advertisements provide indirect support for the government-aligned press (and are therefore not available to certain government-critical media), some news outlets have written that the regulation may even encourage newsagents to withdraw government-critical printed press products from their offerings (Magyar Narancs, 2022).

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

Hungary: Media Pluralism Risk Areas



JS chart by amCharts



Media pluralism in Hungary has been degrading since 2010. Our assessment of the year 2021 shows slight improvements, but these are not due to reforms or a reversion of the trends of the last decade, but a slight recovery from the shock and the emergency measures of the COVID-19 pandemic. The areas of **Fundamental Protection** and **Social Inclusiveness** still show medium risk. The **Fundamental Protection** area registered a slight increase in 2021, among others due to the authorities' surveillance of journalists. The Council of Europe's Platform to promote the protection of journalism and the safety of journalists published its alert No. 147/2021 on Journalists Targeted with Pegasus Spyware. This refers to one of the greatest political scandals in the year 2021: an international collaboration between journalists has exposed the use of the Pegasus spyware against journalists (as well as activists and politicians) in Hungary. This development may have a significant chilling effect on journalists in Hungary, as it may jeopardise the security of journalists and their sources, may lead to self-censorship and might create an additional financial and operational burden for news outlets that are involved in investigative journalistic activities. In the **Social Inclusiveness** area, the risks were most pronounced in relation to disinformation and hate speech and access to media for women.

The risk related to **Market Plurality** has decreased, compared to 2020, when especially the first wave of the pandemic had a visible impact on media revenues, nevertheless, all indicators of the area scored high risk. The **Political Independence** area is still at high risk, as in previous years, as political influence over the implementation of laws, the capture of the market, as well as direct and indirect governmental control can all influence the pluralism and political independence of the media.

These scores do not only reflect the developments of the year 2021, but they are also signs of a tendency that started years earlier, and which have also been analysed in the previous editions of the MPM. Concerning the rule of law, media regulatory authorities and bodies, the transparency of media ownership, and the protection of journalists are all highly important aspects, which we will describe in more detail in the following points:

- **Media regulatory authorities and bodies:** The Media Act of 2010 (Act CLXXXV of 2010) asserts the independence of the Media Authority and the Media Council, and the election of members is, at least formally, a parliamentary procedure. Nevertheless, the ruling coalition FIDESZ-KDNP elected, by their power of having a two-thirds majority in the house, the body of the Media Council all by itself, without considering the nominees of the opposition parties, both in 2011 and in 2019. In October 2021, the President of the Media Authority and its Media Council, Mónika Karas resigned one year early, so that a successor can be appointed by the Fidesz parliamentary majority prior to the election in 2022 (Vaski, 2021a). Her successor, for a 9-year term, is András Koltay, the former rector of the University of Public Administration (MTI-Hungary Today, 2022), a nominee of the prime minister. This highlights the fact that the Media Law on its own is by no means a guarantee of the political independence of the Media Council.
- **Transparency of media ownership and governmental interference:** although the laws aiming at ownership transparency also cover media, in practice, the identity of the ultimate owner is not always clear. Many media companies are controlled by the government or the governing party. The problem, once more, is the close connection between said owners and the government. One of the most striking examples is the government-aligned media conglomerate KESMA (the Central European Press and Media Foundation, established in 2018).
- **Framework for journalists' protection:** in Hungary, no law guarantees the protection of journalists, their rights and duties depend on the fundamental rights and on media regulation. The Hungarian law does not include any regulation against the online harassment of journalists. While physical violence against journalists hardly ever occurs in Hungary, online harassment is common, especially against female journalists (Botás, 2021 and Rutai, 2021). In addition, an international journalistic investigation has proven that Hungarian authorities had used the Pegasus spy software to hack into the phones of investigative or political journalists who worked on issues related to political corruption (Koskinen, 2021).

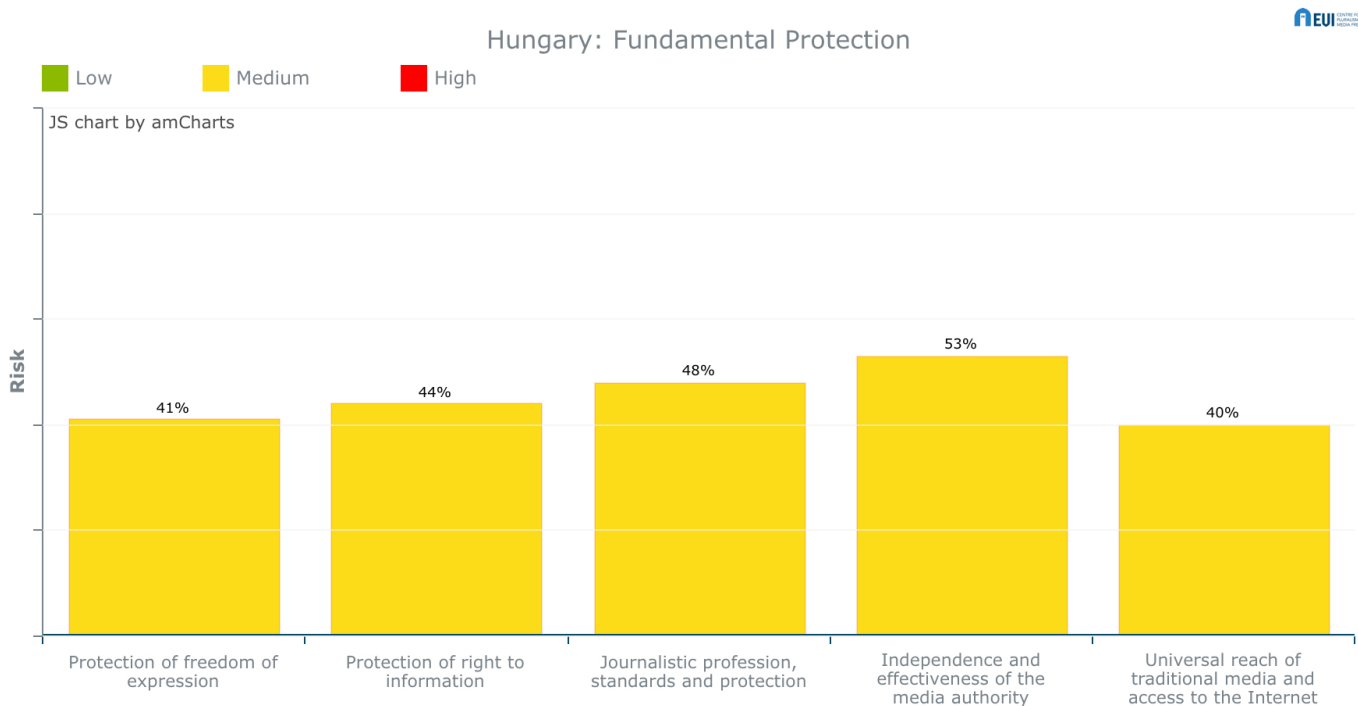
The ruling party exploits its powers as it is supported by a two-thirds majority in Parliament, and is willing to override any law by decree in order to reach its political goals. Moreover, the ruling coalition is also able to use substantial amounts of public funds to organise communications campaigns or provide financial support to the aligned media, thereby distorting the public sphere and weakening media pluralism.

Hungary held national elections in April 2022. One of the promises of the united opposition was to reestablish the democratic public sphere. The election manifesto included a pledge to provide better access to information, secure the independence of the public service media and the national news agency, decrease the amount of state advertising, enforce competition rules in the case of KESMA, create a fund to support independent media, establish an independent media authority, and invest in media literacy for children (Egységben Magyarorszáért, 2022). Despite some polls predicting a close race, Viktor Orbán's

Fidesz party gained 54% of the party votes and 68% of the seats in parliament, thereby gaining another constitutional majority.

3.1. Fundamental Protection (45% - 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.



The Fundamental Protection area registered a slight increase in risk from 41% to 45%. As relevant events, we need to highlight the revelation of authorities' use of the Pegasus spyware against journalists and the nomination of a new head of the media authority prior to the 2022 national election.

Protection of freedom of expression (41% - medium risk)

Freedom of expression in Hungary is guaranteed by multiple laws (Article IX. Paragraph 1 of the Fundamental Law 2011, Article 3 of the Media Act 2010, Article 4 of the Act CIV on Freedom of the Press 2010) conforming to international conventions. However, in practice, there were numerous cases when these laws were breached, or the judiciaries interpreted them in a manner diverging from adherence to the application of already available jurisprudence (see Contributions 2021). In 2020, the since repealed "Authorisation Act" (Act on Protection Against the Coronavirus Pandemic; Act XII of 2020) was criticised by professional organisations and non-governmental organisations (Contributions 2021: 44, HCLU 2020). According to them, the ambiguousness of the wording of the passages could have easily meant that even the disclosure of factual information can cause disturbance, and thus make it eligible to have proceedings initiated against the declarer. Even against journalists who do their job by reporting factual information. An emblematic case in which journalists' freedom of expression was limited is that of the journalist Árpád Tóta W., whose 2018 opinion piece was deemed capable of insulting the honor of the "Hungarian nation" by the Supreme Court. Libel and defamation could still be considered criminal acts in Hungary according to the

Criminal Code (Act C of 2012 on the Criminal Code) Paragraphs 226, 227. In June 2021 a Hungarian blogger, Kristóf Marton was sentenced to 10 months in prison for a Facebook post shaming three police officers. Marton began serving his sentence in prison on the 6th of October 2021 (Kolozsi & Pintér, 2021). It must be emphasised that free speech is not only (and not mainly) restricted by laws, but also by self-censorship. It is widely believed that people can easily lose their livelihood by voicing opinions that are critical of the government or sharing information that might uncover misbehaviour on the side of those in power.

Protection of right to information (44% - medium risk)

The right to access public information is explicitly recognised by Art IV (3) of the Fundamental Law (2011) by the Act CXII of 2011 on the right to informational self-determination and on the freedom of information and the so-called "Glasspocket Law"(Act XXIV of 2003) on the transparency and accountability of public bodies. However, Hungary has not yet started the process of transposing the EU Directive on Whistleblowing (as the only EU member state, others had completed some preliminary steps), which is a good indication of the risks in this area. According to the 2021 OECD report about anti-bribery convention (OECD, 2021), "Hungary has not yet taken any concrete steps to raise awareness in the public and private sectors of the benefits of an effective whistleblower system. In addition, based on the limited information available, the number of whistleblower reports made in Hungary does not seem to have increased in recent years."

Despite the laws formally guaranteeing the right to information, in practice, there were many setbacks. The so-called "Lex Atlatszo" (Act XCI of 2013) made access to public interest information even more difficult. The President of the Parliament restrained journalists' ability to ask questions in the Parliament. (On the limited access of journalists to politicians in the Parliament building, see Smuk, 2019.) There are more and more government contracts that the government deems as being of strategic importance, and thus classifies for decades, without providing any substantive reason for abridging the public's right to know. Declaring documents as "classified", in cases of certain types of government investments, contracts and businesses, is also a commonly used method of denying access to public information.

In 2020, justified as a vital step for the fight against the pandemic, by means of the so-called "Authorisation Act" (2020), the time period of 15+15 days of response to questions and requests to the government was increased to 45+45 days, meaning that even three months can pass between the initial request for information and the official response provided to it. The measure was reintroduced in late 2020 and was in effect in early 2021. In April 2021, the Constitutional Court ruled that the response time can only be increased in cases when the relevant authority can provide sufficient justification why the response needs 45, or 45+45 days (Kolozsi, 2021).

During the pandemic, the government shared little information with the public, terminated their press conferences, and generally did not respond to the questions and FOI requests of journalists (Contributions 2021: 42). In March 2021, newsrooms signed an open letter in which they asked the government to allow journalists to report about the situation inside hospitals (24.hu, 2021). The Hungarian Medical Association supported this request, nevertheless, the government continued denying journalists access to hospitals. Almost a year later, after the newsroom Telex and the Hungarian Civil Liberties Union (TASZ) challenged the practice, the Budapest-Capital Regional Court ruled that it should not be up to the ministries to decide whether journalists can report from hospitals or not, but rather up to the hospital management (Csatári, 2021).

Journalistic profession, standards and protection (48% - medium risk)

Access to the journalistic profession is open for everyone, but trust in and the honor of the profession is exceptionally low. There are also certain socioeconomic and cultural barriers to be considered. While there is no research on this issue, based on conversations with journalists and other stakeholders, we get indications that companies seek young talents as interns for very low or no wages, therefore most of the talented young people choose other professions like advertising or public relations. In her research on the job prospects of rookie journalists, Gödri (2021) found that there is a lack of proper journalistic training and structured internship programmes for a new generation of journalists, while experienced professionals perceive that there is a lack of job opportunities for their younger counterparts. A lack of professionalism, failing adherence to journalistic norms and high political parallelism are described in earlier research, among others by Bajomi-Lázár (2013 & 2017), Sipos (2013) & Vásárhelyi (2012).

Although there are many professional unions and associations (the largest is MÚOSZ, the National Association of Hungarian Journalists with around 5,000 members) with clear self-regulatory guidelines based on international standards and classic doctrines, the polarised media system cannot hold the journalists to these standards, and the standards are often overruled by partisanship, preconceptions, party-loyalty and ideological positions. Even the different unions are associated with the left and the right, and their reputation is very poor. In some newsrooms, we can find a workers' council that represents the rights and benefits of journalists within the media company or the management team.

There is no special law aimed at the protection of journalists' working conditions. Journalists fall under general labor laws. Because of the pandemic, a number of media companies had to introduce restrictions within newsrooms, in 2021, the layoffs continued, among others at the state news agency (Szalay, 2021a) and at KESMA (24.hu, 2021b).

SLAPPs are increasingly seen as a concern in Hungary, but there is no anti-SLAPP legislative framework to protect journalists in the country (Bayer et al. 2021). New wave churches, religious groups and "alternative" health product companies often use SLAPP-strategies against journalists and scientists. For example the Hungarian Faith Church (Hit Gyülekezete) used SLAPPs against the investigative startup Atlatszo and the weekly Magyar Hang, but the case ended with the church losing the lawsuit in July 2021 (Szalay, 2021b).

No law guarantees the protection of journalists, their rights and duties depend on the fundamental rights and on media regulation. The Hungarian law does not include any regulations against the online harassment of journalists. Serious threats against journalists are rare, but online bullying and harassment (often of a sexual nature) is common, especially against female journalists (Tófalvy, 2017, see also Botás, 2021 and Rutai, 2021). In 2021, an Austrian journalist was publicly shamed for the questions she emailed to a prominent member of the governing party. The public service media reported about the event in a segment titled "The journalist provoked by asking questions" and criticised the journalist (her name and picture were displayed on the screen) for sending "provocative allegations disguised as questions" to the governing party's politician. The report was an extreme example of a smear campaign in which the politicians of the governing party weaponised the public service media for the purposes of character assassination (Spike, 2021, see also the Council of Europe's Platform to promote the protection of journalism and the safety of journalists' alert No. 68/2021). In addition, an international journalistic investigation has proven that Hungarian authorities had used the Pegasus spyware to hack into the phones of investigative or political journalists who worked on issues related to political corruption (see the Council of Europe's Platform to promote the

protection of journalism and the safety of journalists' alert No. 147/2021). The spying after journalists raises concerns, among others, in relation to the protection of journalistic sources. The surveillance of journalists was authorised by the Justice Ministry and was administered by the Hungarian intelligence services (Vas, 2022). When journalists and civil society inquired about the details of the surveillance, authorities refused to answer questions. The supermajority of the governing party prevented convoking the National Security Committee in Parliament over the surveillance of journalists, officials, politicians and critics of the government (Vaski, 2021), while the media authority remained silent about this extreme interference into journalistic work. The details of the official investigation are classified until 2050, the president of the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) claimed that the use of the spyware was in adherence to the law (Vaski, 2022), again showing that authorities cannot do their work independently from the government.

Independence and effectiveness of the media authority (53% - medium risk)

The National Media and Info-communications Authority (NMHH – Media Authority) was established by the Media Act 2010. According to the Media Act 2010, the main objective of the Media Council is to guard and shape the media landscape by enforcing the stipulations of the law regarding pluralism, editorial independence, ownership, frequency allocation, fair competition, child protection and overseeing the operations of the PSM. The Media Law formally guarantees the independence of the Media Authority, but the appointment procedures do not provide adequate legal safeguards for independence when a government has a two-thirds majority in the Parliament. Ever since its establishment, all five members of the Media Council were nominated and elected by the Fidesz party majority in Parliament for nine-year terms. The president of the Media Authority and the Media Council is the same person, appointed by the president of Hungary based upon the nomination by the prime minister. While the rules on eligibility and incompatibility for the members are specified in the Media Act 2010, they do not ensure objective and transparent procedures in practice. The last election of the members of the Media Council took place from September to December 2019. While oppositional parties had presented their candidates by the September deadline, governing parties Fidesz and KDNP did not manage to do so, still, MPs of the governing party outvoted the candidates of the opposition until they found their own nominees. In October 2021, the President of the Media Authority and its Media Council, Mónika Karas resigned one year early, so that a successor can be appointed by the Fidesz parliamentary majority prior to the election in 2022 (Vaski, 2021a). Her successor, for a 9 year term, was András Koltay, the former rector of the University of Public Administration (MTI-Hungary Today, 2022) who was nominated by the prime minister.

The Media Council refuses to enforce some of the most important aspects of the Media Act 2010 (especially those related to media pluralism), while its licensing practices run counter to the Act's pluralism provisions. The Council of Europe's publication "The Media Regulatory Authorities in Europe" mentioned deficiencies in the Council's independence, pointing out that "vague and unfounded application of the law exemplified non-compliance with rule of law requirements and insufficient protection of fundamental rights of citizens". It further mentioned that "decisions regarding radio frequency tenders were rendered without debate or opposing votes" (European Audiovisual Observatory, 2019). Allowing for one-sided, propagandistic news coverage in all public-service radio and television channels is a violation of the Media Act's "balanced coverage" tenet (even if a research conducted by the right-wing Observatory of Journalism – OJIM, the author found that media authority's sanctioning of broadcast media was relatively balanced, as the aggregate value of 7 years of fines received by government-aligned TV2 and the rather critical RTL Klub was almost equal [Pongracz, 2020]). At the same time, its licensing and de-licensing decisions have handed, over time, all radio and most television frequencies to government-supporting owners or

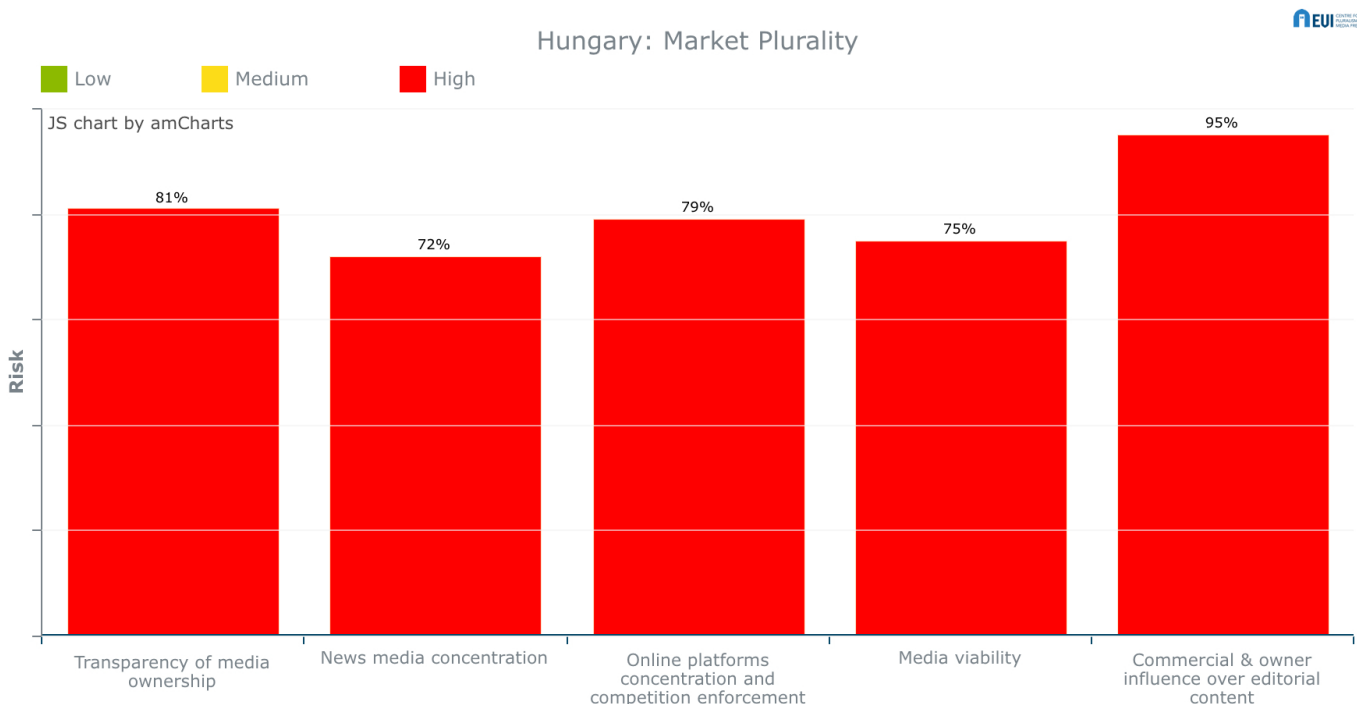
management. In the near past, the case of Klubradio was in the centre of attention. Klubradio had for a decade been Hungary's last remaining independent news and talk radio. For the frequency of Klubradio, the Media Council called for new tenders in November 2020. To this, besides Klubradio, Spirit FM – a radio connected to the government-friendly but liberal-leftist ATV –, and pro-governmental LBK also applied for the tender. The Media Council requested Klubradio to complete their application and disqualified two other applicants from the tender. In March 2021, however, the Council decided that the application of Klubradio is insufficient in many aspects (NMHH, 2021a), and gave the frequency temporarily to the previously disqualified Spirit FM, without calling a new tender. (See IPI, 2021 & Mong, 2021)

Universal reach of traditional media and access to the internet (40% - medium risk)

Article 11 of the Hungarian media law guarantees the existence of the Public Service Media, but universal access is not specified. All public service television channels are distributed via digital satellite and terrestrial broadcasting and can be accessed by more than 99% of population via DVB-T. The coverage of public service radio channels varies from 70% to 99% according to the channels and the types of the receiver. The print media distribution market is dominated by the private Lapker and MédiaLOG-DMHM. The latter company is owned by KESMA and took over the task of home-delivery from the state-owned Magyar Posta (Hungarian Postal Service) which discontinued most of its news media delivery services in mid-2021 (Szalay, 2021c). Problems with the delivery of newspapers to small villages still persist. The internet penetration in Hungary is 91%, universal access to broadband has not been achieved yet.

3.2. Market Plurality (80% - 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 year 2021 saw a slight improvement from last year's 82% to 80%. Media outlets and the advertising market have mostly recovered from the shock caused by the first wave of the COVID-19 pandemic and the lockdowns already by the second half of 2020. Still, many outlets experience problems when it comes to financing their operations from the market. Market plurality is the topic of many ongoing debates. While many of the largest independent or not government-aligned media outlets were closed down in the past years in Hungary – all the while giving room to the growth of government-friendly media –, the government and its sympathisers claim that the market has become more diverse, and point to a number of outlets that are still critical of the government (see, for example, Szilvay, 2022).

While many independent outlets are still being published, and there are in fact newly launched news outlets that are critical of the government (some of the most successful ones being Jelen, Válasz Online and Telex), the government dominates the broadcast, local and regional media markets (Mertek, 2019; Bódis, 2021). Although accessing critical media is possible to every household with an internet connection or a television set, those audience members who don't look proactively for objective or independent journalism will likely be nudged towards information that is controlled by the government.

Transparency of media ownership (81% - high risk)

Media organisations have to abide by the general laws on transparency, but there is no media-specific regulation. All business entities operating in Hungary, including media, are required to register with the Court of Registry. This means that every Hungarian business is obliged to disclose its owners, and this information is freely available to anybody. There is no special regulation on this issue in the media market, the media companies have to inform the Media Council about any change in their ownership and about their media products. Paragraph 63/14 of the 2010 Media Act specifies that broadcast media companies shall fulfill the terms and conditions of their contract with the authority and includes that if some changes occur in the ownership of the media service provider, the information should be announced also at the Media Authority within 5 days. Nonetheless, the MPM implementation shows a high risk, as the legal provisions, and the Media Council itself fall short in guaranteeing effective transparency for all media, as well as effective and easy access to the relevant information by the public, particularly for the disclosure of ultimate and beneficial owners of media outlets. However, Act XLIII of 2021 has established a register for ultimate beneficial ownership, which will be fully operational in July 2022 and can thus mitigate some of these risks in the future.

News media concentration (72% - high risk)

This year Hungary performs better in connection to News media concentration than the previous year (84%). While on the market of traditional media there were no significant changes, there is a thriving online market with a high number of individual owners.

The government-aligned KESMA media foundation (also referred to as the Central European Press and Media Foundation or CEMPF) is the largest media conglomerate in Hungary, possessing nearly 500 news outlets (about the foundation and the associated risks, see Brogi et al., 2019). There are media types, especially in the regional newspaper market and the radio market, where the concentration is high (Mertek, 2019). Concentration is normally seen as a problem related to a small number of individual owners who are buying out the competition. In Hungary, however, we can also identify “political” or “ideological” concentration - when outlets that are on paper independent from each other, follow the same political interests and share the same narratives (Rényi, 2017 described that key messages in these outlets are often dictated to editors or journalists by representatives of the government). From this perspective, it doesn't matter how many individual owners there are on the market, and what their share of ownership is.

This aspect of concentration is often neglected, but the concentration of narratives and views through different actors - maybe for the sake of avoiding the regulatory limitations - leads to the same problems: inequalities in the reach of information, and a controlled market. The government's presence is most visible on the radio and local print market, where the overwhelming majority of outlets are under the government's influence. One of the commercial television stations (RTL) is still independent in its news coverage and critical voices persist amongst print outlets with a national reach. The digital environment shows more pluralism: outlets critical of the government, like Telex, hvg.hu, 444.hu or 24.hu, have a dominant position in the market and a significant readership share (DKT, 2022).

Online platforms concentration and competition enforcement (79% - high risk)

Hungary does not have any platform-specific regulation for preventing online platform concentration.

Enforcing competition in any market is the task of the economic competition authority, but its mandate does not extend to supranational actors, like Facebook or Twitter. There were some weak initiatives and communicative acts by government officials to regulate these platforms (for example by Judit Varga, Minister of Justice, in January 2021) - but these were not on the basis of competition, but to put an end to non-transparent content filtering and takedowns. From the aspect of advertising revenues, local online news and service providers have been demanding for years the resolution of online advertising revenues, because - according to the Hungarian Advertising Association (Kreatív 2022) - around 65% of the online advertising revenues were skimmed by Facebook and Alphabet in 2021, and their share has been growing annually in the past years.

Media viability (75% - high risk)

According to the Hungarian Advertising Association (Kreatív, 2022), the total advertising revenue of the Hungarian media market increased by 15,6% from 2020, but counting with real-value prices this growth is equal to a stagnation compared to the pre-pandemic level in 2019. On the one hand, it means that the preliminary estimates of 30-40% of losses turned out to be serious miscalculations in early 2020. But the final, seemingly fair market performance of the media companies can be misleading. We have to consider the severe price inflation on the market, the effect of the election campaigns that started already in 2021 and further structural changes of advertising expenditures benefiting the supranational online platforms. The latter causes severe risks on the media market, because according to the report of the Hungarian Advertising Association, 40% of the advertising revenues of the total Hungarian media market went to Facebook (Meta), Google (Alphabet) and other online platforms. While the share of the online platforms from digital advertising was 51% in 2016, by 2021 it increased to 65 %.

In order to get a complete picture, we must add again the role of state funds and advertising in the media market. State advertising is used as a form of subsidy in the Hungarian advertising/media market, and is allocated in a way that clearly favours news outlets that are supportive of the government. We don't have figures on the amount of state/government advertising for 2021, but there is no reason to assume that the growth on a year-on-year level (Bátorfy and Urbán 2020) stopped in 2021, one year before the parliamentary elections.

We neither have any research on the living conditions and earnings of journalists. While there were some severe salary-cuts in numerous newsrooms in 2020 (Média1, 2020), we don't have any new information about similar measures in 2021. Anecdotal evidence shows that at least some newsrooms had to correct salaries due to inflation, and this trend will continue in 2022. Newsrooms are experimenting with new revenues. The role of crowdfunding, subscriptions, and alternative sources of revenue continued to increase in 2021.

Commercial & owner influence over editorial content (95% - high risk)

There are general provisions in media laws specifying the independence of media, but there are no laws sheltering editors from commercial interests' influence on appointment and dismissal decisions, or stipulating the obligation of journalists or media outlets not to be influenced by commercial interests. In general, journalistic associations and self-regulation have very limited influence on the work of Hungarian journalists. In Hungary, it is very difficult to separate the influence over editorial content from commercial advertisers and owners from political and governmental pressure. This influence has a double nature. On one hand, editorial staff are traditionally exposed to commercial and owner influences on content, and this

pressure led to shady practices in the form of unmarked advertorials, PR-interviews, etc.

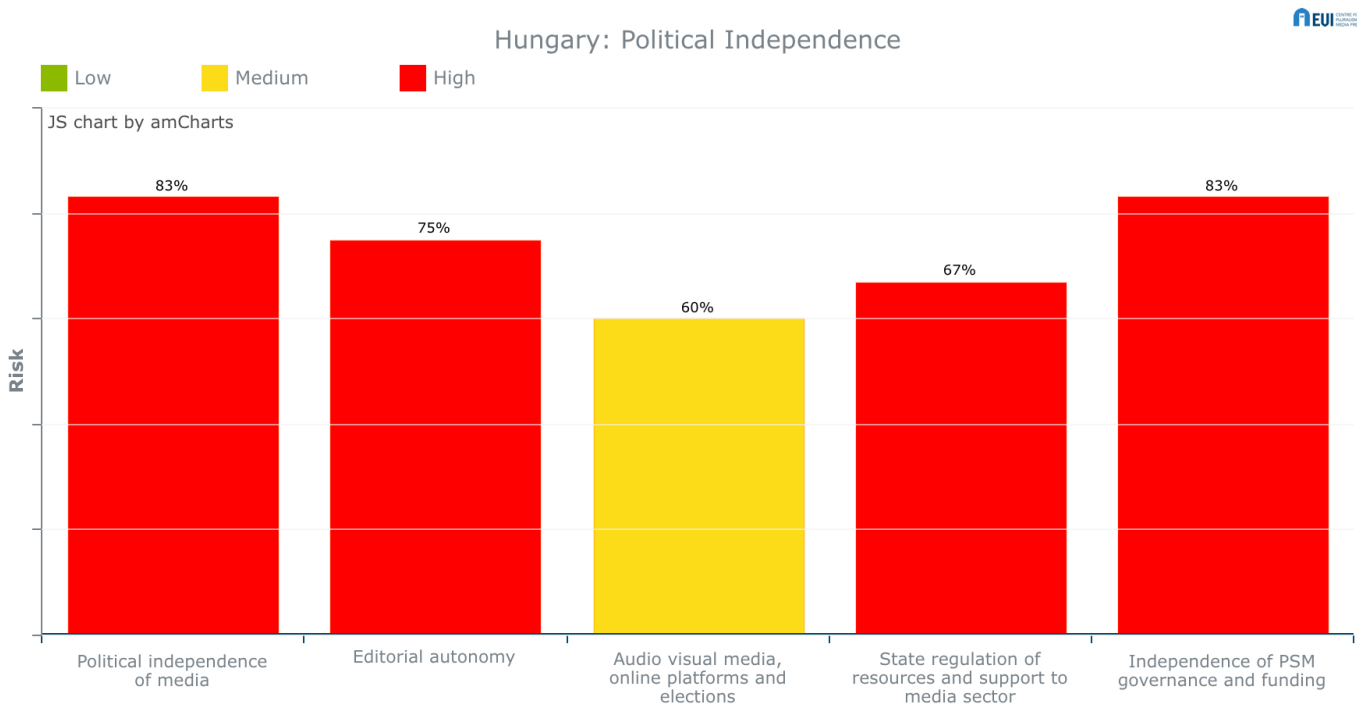
Article 30 of the 2010 Media Law permits “product placement” only for audiovisual media, the Hungarian Association of Content Providers’ (online media) and the Hungarian Association of Publishers’ (print media) codes of ethics deal with “paid content”, “advertorial” and “conflict of interest”, and the National Association of Hungarian Journalists’ code of ethics include sections on “covert advertising” and “unmarked advertising”. Nevertheless, there have been several examples of misconduct and unethical practices in the print and online media.

On the other hand, there is indirect governmental pressure on commercial advertisers to increase their expenditures in pro-government outlets and decrease it in independent news media. Some seemingly (or at least on the ownership level) independent news outlets design their reporting and voice in favor of State advertising, like in the case of *ATV*, the leftist *Népszava*, or the free *Pesti Hírlap* (Rényi 2021). The latter was campaigning on the side of the government, amongst others through front covers that were attacking the leader of the opposition, Péter Márki-Zay. Because these frontpages were designed without the consent of the staff, many journalists, including the editor-in-chief, resigned. Considering this, direct pressure is still rare in Hungary, but the risks are clear.

3.3. Political Independence (74% - 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 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.

In this edition, we recorded a slight decrease from 78% to 74%, as the year 2021 didn't see the kinds of politically motivated take-overs of independent news media as was the case in 2020 with Index.hu. Still, the risk remains high, as the space for independent media is very limited in Hungary, journalists are subject to surveillance, regulators, the news agency and PSM are under governmental control. Political independence is the only area where the risk in the digital sphere is visibly higher than the overall risk: 86%. This is, among others, due to authorities' use of the Pegasus spyware against journalists.



Political independence of media (83% - high risk)

The Media Act sets up certain provisions restricting political parties and politicians from providing audiovisual media services (Act CLXXXV of 2010 on Media Services and on the Mass Media, sections 43 and 46). But political parties and politicians (except members of local governments) can own newspapers and online news sites without any restrictions. Almost all political parties have their own, mostly online, news outlets that provide commentaries that are clearly shaped by the party line. In addition, there are some politicians who own professional news outlets too, like Péter Ungár, a member of parliament for the green party LMP (Politics Can be Different), who owns different small, local news sites, and the Budapest-based web startup Azonnali.hu; at the same time, he also used to have a share in the pro-government weekly newspaper Figyelő (now part of KESMA) through a company owned by him and his family members. Many

municipalities (both governing-party- and opposition-run) publish their own newspapers, often run by journalists who made a name in the political press; so far there has been no research that looked at the content of these media, thus it is hard to determine to what extent they provide factual news and how much of their content is shaped by party interests or political agendas (see, for example, Transzparens Újságírást Alapítvány, 2021b).

Indirect influence via proxies, government-aligned investors and business ties is one of the main characteristics of the Hungarian media market (Dragomir, 2017; Szeidl & Szucs, 2021; MFRR, 2021). The traditional duopolistic division of the media market between the left and the right was dismantled by the Fidesz-KDNP government after 2010. At present, the Fidesz government has a dominant footing over the commercial TV and radio markets, primarily through indirect ownership by a group of Fidesz-linked business moguls, and the Central European Press and Media Foundation (KESMA), which was established in November 2018. The government-supportive media empire consists, among others, of the second-largest nationwide commercial tv-channel (TV2), one news channel (Hír TV), the largest commercial radio (Retro FM), the country's only national commercial radio network (Radio 1-network), a string of local radios (Karc FM, Gong FM, Trend FM, Best FM), and (since 2010) the public service media. The government's control over these media outlets means that older, lower educated and/or rural audiences have less access to critical information, as the media most accessible to (or most widely used by) these groups act as amplifiers of government messages, without any internal pluralism in their content.

The national news agency MTI offers newscast services to radio stations, so that they don't have to engage in the costly production of their own news segments. These segments, however, are widely seen as biased. As an assessment of radio news content by Hargitai (2020), in the aftermath of the 2018 national election, found, some degree of (external) pluralism was only observable in the capital city. Apart from that, "radio news bulletins dominantly broadcasted pro-government messages across the entire radio spectrum, across almost all talk and music formats, interrupting classical, pop or folk music every hour, for target demographics from young to elderly listeners, across the country, in both the state and private sectors. News supporting government ideology is almost unavoidable for those who wish to listen to music or any Hungarian talk over the air. This lack of choice, unlike in a filter bubble media model, creates a radio content continuity in which the ideological frame of the news may be sharply different from what the listener would choose" (Hargitai, 2020:144).

At the Budapest special meeting of the US Conservative Political Action Conference (CPAC) organised in May 2022, the prime minister admitted that control over the media and the establishment of mouthpieces is part of his strategy to hold on to power. According to reports, he made the following recommendation to American conservatives: "Have your own media. It's the only way to point out the insanity of the progressive left [...] The problem is that the western media is adjusted to the leftist viewpoint. Those who taught reporters in universities already had progressive leftist principles" (Garamvölgyi, 2022).

Even some government-critical outlets are captured by the government (Bódis, 2021). ATV, for example, is owned by the "Hit Gyülekezet" (The Faith Church, an evangelical community) whose leadership is seen as close to the government. Despite being captured, the outlet still employs a number of journalists who are critical of the government (one of the channel's talk show hosts, for example, joined the campaign team of opposition PM-candidate Péter Márki-Zay). There are also outlets dedicated to promoting the positions of specific opposition parties and platforms that openly convey left-wing values and support leftist candidates during elections (Fábián, 2021). In some cases, this support is rewarded financially: the government-critical weekly Jelen, for example, received funding from an opposition-controlled municipality, which is also

worrying for political independence (MN, 2022). At the same time, there are some outlets in print, online and broadcast (the television RTL Klub) that are keeping a distance from political actors and are dedicated to providing unbiased and critical information, including investigative journalistic articles.

Editorial autonomy (75% - high risk)

Many newsrooms are directly controlled by the governing party's proxies, and thus publish content that is heavily biased towards the government. The public service media is widely considered as being under governmental control, and the news agency, the state-owned Hungarian News Agency (MTI), is a subsidiary of the Hungarian PSM. Investigative articles were published that prove that the PSM management requires employees to be supportive of the Fidesz government (Keller-Alánt, 2020), and the journalists and editors of the news agency take direct orders from politicians (Wirth, 2022a&b).

At the same time the government makes it difficult for independent media to exist at all. The fierce competition for a declining amount of advertising, the often politically motivated decisions by regulators and courts, as well as the fabricated, "kompromat" campaigns against independent journalists and owners contribute to an atmosphere of fear and intimidation. This has a visible chilling effect on critical journalism. Self-censorship is common in Hungary (Schimpfössl & Yablokov, 2020) and self-regulatory measures are not followed by journalists. In the case of the independent online news outlet Index in the summer of 2020, the increased political influence led to the resignation of the whole newsroom. There are signs that in the new Index newsroom, editorial decisions are made under the influence of the governing party. The weekly Magyar Hang published a short article about the reason why Balázs Gabay, a former editor at Index, quit his job. Gabay reportedly felt increasing political pressure within the newsroom, articles were written under aliases, and made-up investigative articles were published about the alleged plans to sell (the opposition-run) Budapest City Hall. As Gabay wrote: "somebody used Index as a political platform to attack their political enemies" (Bodacz, 2022). The same occurred at Pesti Hírlap, owned partly by a close friend of Antal Rogán, head of the Cabinet of the Prime Minister, and head of campaign communication of the government parties Fidesz-KDNP during the elections. In October 2021, when the daily free newspaper published issues with frontpages attacking the leader of the opposition, Péter Márki-Zay, without the consent of the editor-in-chief and the staff, the editor-in-chief, István Pion, and some editors and journalists resigned a couple of days later (Nagy, 2021).

Audio visual media, online platforms and elections (60% - medium risk)

According to the Media Act of 2010 and the Code of Ethics of the Public Service Media, the PSM channels and services are expected to provide fair, balanced and impartial representation of political viewpoints in news and informative programmes (Act CLXXXV of 2010 on Media Services and on the Mass Media. Section 96). This key principle, however, is not implemented in practice. Even the Media Authority has on several occasions found that the PSM is gravely biased and uncritical towards the government.

The Act on Election Procedures obliges media service providers to give all contesting political parties equal opportunity. At the time of data collection, the latest national election took place in 2018 (the April 2022 election is not yet captured in the scores); in that year the OSCE reported a lack of a level playing field in the media: "Throughout the campaign there was a ubiquitous overlap between the ruling coalition's campaign messages and the government's anti-migration, anti-Brussels, anti-UN, and anti-Soros information campaigns, evident, in particular, in outdoor and online advertising. The widespread government information campaign was largely indistinguishable from Fidesz campaigning, giving it a clear advantage.

The social media accounts of government and Fidesz actors often made little distinction between official information and political campaigning. Campaigning also coincided with unexpected distributions of public funds. On 7 March, the prime minister announced that the government would provide all pensioners with vouchers worth HUF 10,000 and reduce household utility bills by HUF 12,000. The government ran advertisements promoting the latter decision. Such instances undermined the level playing field for campaigning and raised questions with regard to the abuse of administrative resources and the blurring of the line between state governing and party campaigning, which is at odds with OSCE commitments” (OSCE, 2018).

In 2018, during the campaign of Parliamentary elections, it was ordered by the PSM owner Duna Médiaszolgáltató Nonprofit Zrt. that each political party has to receive 5 minutes of airtime to present their political program. The PSM channel M1 did exactly that: oppositional parties received not more than 5 minutes of airtime, which took place in form of a short interview during the campaign period. In 2022 again, the PM candidate of the united opposition only received 5 minutes of air-time on the PSM (hvg.hu, 2022). The Curia (Highest Court) has deemed unlawful that for two weeks, no oppositional politicians were invited to the PSM’s morning programmes, while pro-governmental individuals and governmental politicians were regular guests (Haszán, 2018). In November 2020, Radio Free Europe published recordings leaked from PSM newsrooms, where two editors threatened journalists in the run-up to the 2019 EP election. They said: in case some colleagues do not feel comfortable making reports and analyses of situations according to the governmental standpoint, they are free to leave. The Media Council refused to deal with this revelation.

Private channels can decide whether they want to provide airtime to political advertising or not. The price of individual ads can be found on the website Asz.hu, and outlets have to publish a detailed list of ads ran during the campaign period (Szalay, 2022). The rest of online political advertising mainly takes place on Facebook and is thus unregulated and non-transparent. The data provided by Facebook have raised some questions on methodology in Hungary. Political advertising outside of the electoral campaign period is not allowed for political parties. But the government can advertise. This practice was criticised by the opposition and NGOs. However, the Media Authority ruled that government’s adverts do not count as political advertising, but have to be regarded as “public interest” messages – even though much of the government’s advertising is clearly political in nature.

During the opposition’s primary elections of 2021, there was little to no coverage on PSM channels about the event that involved 633 thousand voters (almost 10% of the population). The Hungarian News Agency published no news pieces about the results and partial results of the vote count of the first round on 30th September 2021. After the second round of the primaries, Péter Márki-Zay, Mayor of Hódmezővásárhely, Chairman of Mindenki Magyarországa Mozgalom (Hungary is for Everybody) was nominated the opposition’s candidate for prime minister. PSM channel M1 did not invite him in any of its programmes, no interviews were made with the winner (Szily, 2021). In its assessment of the news segments of the PSM, Mertek (2021) found that the PSM was used as an “audiovisual propaganda tool of the government”. The coverage of the opposition was biased, and the reports were based almost exclusively on the content of the government-aligned media. In a recently published documentary, the Five Lessons on the Eradicating the Reality (Öt lecke a valóság felszámolásáról), former journalists and editors of the PSM tell that during their time at the MTVA the modus operandi was a constant pro-government campaign (Máté & Szentpéteri 2022). In the run-up to the April 2022 national elections, the right-wing Observatory of Journalism (OJIM) found that both the government-aligned and the critical outlets were biased towards one or the other political camp, still, the government-critical news outlets are more likely to criticize the opposition’s candidate, while government-aligned outlets won’t publish any article that is critical of the prime minister (see Bakró-Nagy,

2022a&b). During the campaign, Mertek's (2022) content analyses of television news programmes found that only the private RTL Klub was capable of providing balanced coverage.

There is no regulation on online campaigns on social media, but the Facebook Ad Library and the Google Transparency Report make it possible to track spending. Hungarian journalists and researchers often make use of these databases. Bene et al. (2021) found that during the elections of 2018 and 2019, the opposition was more actively campaigning on Facebook, in part due to a lack of access to traditional media. There are indications that the governing party is planning to increase its presence on social media for the 2022 campaign: in an investigation of one week's online spending in December, Pető (2021) found that the most prominent government-supportive entities (in this case including spending by the government as well) spent 12 times as much on Facebook political advertising as those who were critical of the government. Political campaigns in late 2021 and in 2022 in the social media sphere saw an unprecedented shift towards political influencers – government-paid actors who share the ideology and topics of the government, with slight changes to better suit their certain audience. Many targeted ads appear on Facebook, and most of them are paid by Megafon, a media body funded by governmental actors. They spend tens of millions of forints (thousands of EUR) per ad, which inflates the average prices for social media advertisements, thereby making it virtually impossible for smaller online actors (for example independent politicians) to target their ads properly (ATLO, 2022).

State regulation of resources and support to media sector (67% - high risk)

There is no legislation regarding the distribution of direct state subsidies or state advertising to private media, reduced value-added tax (indirect subsidy) is available to all print publications. The state is the largest advertiser in Hungary (Bátorfy and Urbán 2019), past research has estimated that up to one-third of total advertising revenue comes from the state (Bátorfy 2020). State advertising is distributed unevenly, favouring government-aligned news outlets. The share of state advertising in the revenue mix of government-aligned daily newspapers was estimated to be, on average, 75% of all their income. For weekly newspapers, this number was 92%, for television stations 95%, for online news media 90%, and for radio 90%. State advertising is often used for propaganda purposes or to campaign for the governing party under the disguise of public interest information (such as praising the government's achievements or demonising entities who allegedly try to meddle in Hungarian politics, like George Soros or Jean-Claude Juncker).

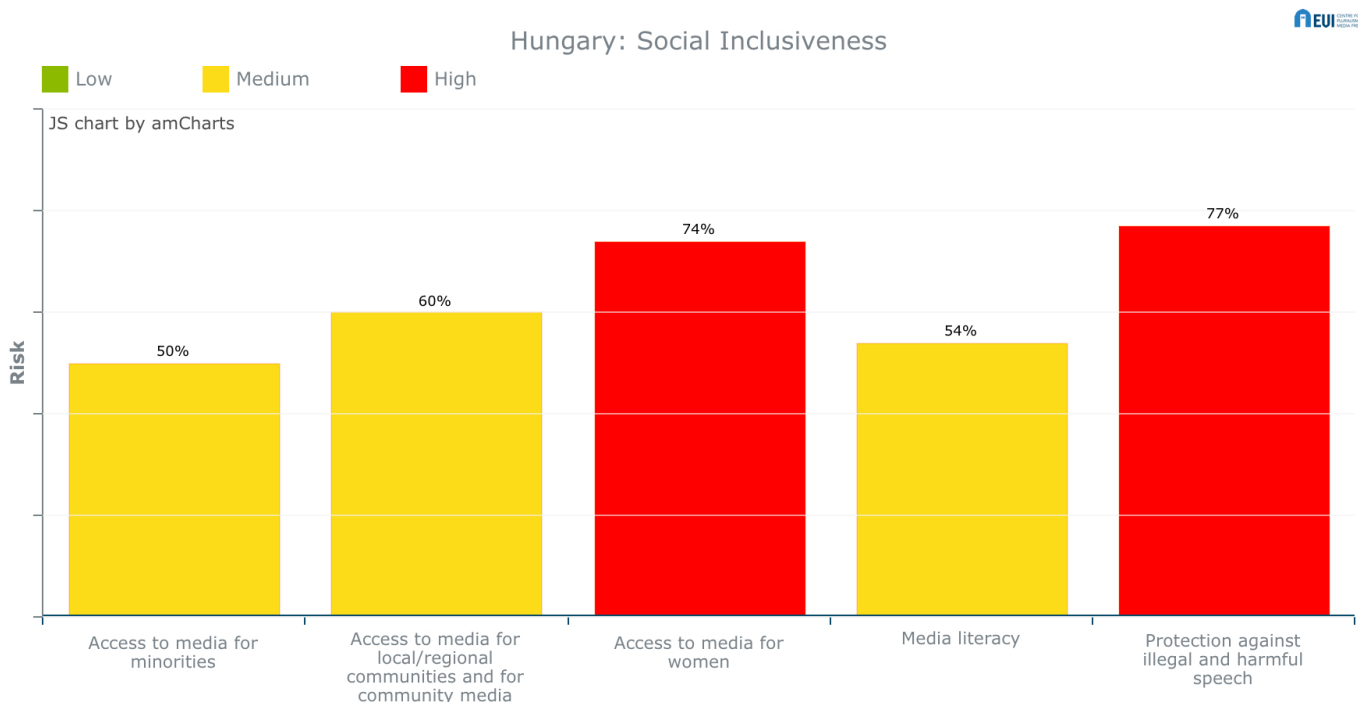
Independence of PSM governance and funding (83% - high risk)

State support provided to the PSM is growing annually. In 2021 the publicly funded budget of the PSM was HUF 118 billion (close to EUR 300 million, see Parlament.hu, 2020). This means that the PSM is the largest media company in Hungary. The Media Council is responsible for approving the Media Services and Support Trust Fund's (MTVA) annual plan and subsidy policy and for determining the rules governing how MTVA's assets can be used, managed, and accessed by the public media. The Fund's annual budget is approved by the Parliament. There is a lack of transparency, civil control and oversight over the budget of the Fund. The PSM is supervised by a single body, the MTVA, which is managed by the Media Council, a body composed of five members who were all appointed and elected by the governing majority. The chairperson of the Media Council appoints, sets the salary for and exercises full employer's rights over the MTVA's director general, deputy directors, as well as the chairperson and all four members of its Supervisory Board (see Venice Commission, 2015).

3.4. Social Inclusiveness (63% - 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** continues to score medium risk, very close to high risk (63%). As highlighted in the previous editions of the MPM, it is very difficult to evaluate the risk associated with the issues covered in this area, partly because there is a limited amount of relevant or recent data. The lack of available data can be explained by the fact that research in this area is hardly ever conducted in Hungary due to a lack of resources.



Access to media for minorities (50% - medium risk)

The 2010 Media Act guarantees access to the public media for various groups, including ethnic, religious, local and regional communities, as well as for people with disabilities (Sections 39, 73, 74, 75, 83). However, minorities which are not recognised by law do not have access to airtime, especially on private television and radio channels. According to the National Media and Telecommunications Authority, neither the thirteen recognised minorities, nor any other minority have their own programmes and airtime on commercial, private television channels (NMHH, 2017). In recent years, there have been numerous civic initiatives aimed at producing minority programming as well as at providing education for minority journalists. The PSM has a weekly Romani programme the Roma Magazin, and in March 2019 a private company launched the first Romani television channel, the Dikh TV, which produces not only television shows, but also music videos for Roma popstars. However, Dikh TV was bought by a government-aligned interest group in 2020.

Modern Roma popular culture is not represented in the PSM, neither on large private television and radio channels, but Romani pop music videos are extremely popular on Youtube and their viewership largely

overperforms most of the Hungarian popular music production. The representation of Romani people is very poor in the national culture (see, among others, Messing & Bernáth, 2017). Their roles in Hungarian movies, television series and talk shows are limited, stereotypical and highly caricaturised. The usual role for Romani actors is the criminal, the deviant, the drug addict, or the loud, the harsh, and the “Gypsy musician” (see, among others, Munk, 2013). The diverse, modern, high-quality Romani culture is thriving on Youtube and on Facebook - such as *QRTV* (Queer Romani Tv), *TV Baxtale* (stands for “lucky” TV in Romani) and its independent live talk show, *Ame Panzh* (The five of us) (see Bleyer-Simon, Benedek & Rácz, 2022).

Access to media for local/regional communities and for community media (60% - medium risk)

Access to media for local/regional communities and for community media poses medium risk, and it increased from 59% to 60%. All the regional newspapers are owned by the KESMA. Some free newspapers are published at the local level, but they are not independent from the local municipalities (neither in the opposition-run municipalities). Community media are awarded access to media frequencies through tender procedures and decisions carried out by the Media Council. The 2010 Media Act specifies a range of programming provisions and obligations for linear community media. According to these provisions (Section 66), community media are: “a) intended to serve or satisfy the special needs for information of and to provide access to cultural programmes for a certain social, national, cultural or religious community or group, or b) are intended to serve or satisfy the special needs for information of and to provide access to cultural programmes for residents of a given settlement, region or reception area, or c) in the majority of their transmission time such programmes are broadcasted which are aimed at achieving the objectives of public media services.”

Since new media laws (Act CLXXXV of 2010 on Media Services and Mass Media and Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content) were passed in 2010, the community media sector has undergone significant changes that have radically reduced the diversity of Hungary’s community media sector. Community radio licensing has been highly politicised since 2010, due to the National Media and Telecommunications Authority (NMHH’s) tendering practices which have generally favored outlets that provide government-friendly, conservative and/or religious programming. On December 21, 2019, one of the oldest community radios in Hungary, the Civil Radio was closed down after 24 years of existence, because the Media Authority did not give them the license to broadcast. The non-political Civil Radio was the only radio station dedicated to representing civil, non-governmental organizations. Another worrying development for community media in Hungary took place after the data collection for the MPM2022 (thus it didn't affect the risk score). On 14 April 2022, the Media Council decided to block the license renewal of one of the country's oldest independent community radio stations, the Tilos Rádió. The Media Council justified its decision by referring to four instances since 2015 when hosts or guests used inappropriate language, two failures in the radio's data provision to authorities, and two minor irregularities in the radio's annual reports (MFFR, 2022).

Access to media for women (74% - high risk)

The public service media doesn't have a gender equality policy. Only a third of the PSM's department heads are women and only one out of eight executives is female (MTVA 2022a and 2022b). The situation isn't better in private media, but at least the most popular independent commercial television company RTL Group is led by a female CEO, Gabriella Vidus. The latest research of the NMHH (2021b, covering the year 2020, published in May 2021) shows that women are still underrepresented in news and current affairs broadcast media content, accounting to approximately 25% of the persons shown in either public service or

private media. There is no research on women's representation in other media.

Media literacy (54% - medium risk)

It is difficult to assess the level of media literacy in Hungary due to the lack of extensive research and reports. Therefore, the medium risk level associated with the media literacy indicator can be misleading. The insufficient degree of media literacy is one of the biggest problems in Hungary - at a time when the government's official communications often include misleading statements, and at the same time government-controlled private news outlets and the public service media (normally a requirement to build resilient and informed societies) regularly spread disinformation (see Bayer et al. 2021, Szicherle & Krekó, 2021).

At present, media literacy is mainly addressed under the National Curriculum, the country's new educational policy launched in 2013. The objective of media literacy is to enable students to responsibly participate in the global public sphere and to understand the use and language of both new and conventional media. According to a 2015 study (Neag, 2015), efforts to centralize and homogenize media education along with the whole education system may hamper the above stated objectives. In addition, while the National Curriculum addresses digital literacy, poor IT infrastructures in schools combined with significant reductions in the number of IT classes under the National Curriculum threaten to exacerbate the digital divide among low income students and other social groups. The 2010 Media Act also obliges the Media Council to promote media literacy. The legislation specifies that it is the obligation of the PSM to "promote acquisition and development of knowledge and skills needed for media literacy through its programmes and through other activities outside the scope of media services" (§82(2)(c)). In 2014, the Media Council launched a media and literacy education centre called the Magic Valley - the initiative is listed by ERGA (2021) as one of the "good examples" in the EU, "which on the one hand educates students in order to develop their media literacy and on the other hand provides lesson plans and infographics for teachers". The Council has also hosted at least one major international conference (Decoding Messages- Best Practices in Media Literacy Education) that involved input from a range of international experts. In addition, the Council has published a book and an educational film package on media literacy that can be used in educational programs and schools. There is no data available on the impact or success of the Council's media literacy program. In the past few years some non-profit news organizations (like Átlátszó), and several NGOs (like Mérték, Televele, Független Médiaközpont, Urban Legends) launched media literacy programs for teachers, students and journalists. The workshops focus on "fake news", digital tools, child-protection and surveillance. It is very difficult to measure their impact, but one of the very few pieces of research on media literacy in Hungary (Neag & Koltay, 2019) pointed out that finances for such civil society programmes are uncertain, and as such their reach is limited. We must also highlight the ambiguous role the PSM and the Media Council plays in media literacy programs. On the one hand, they organise good workshops and their Magic Valley project is popular, but on the other hand, the PSM often spreads disinformation, and its editorial practices are highly questionable.

Protection against illegal and harmful speech (77% - high risk)

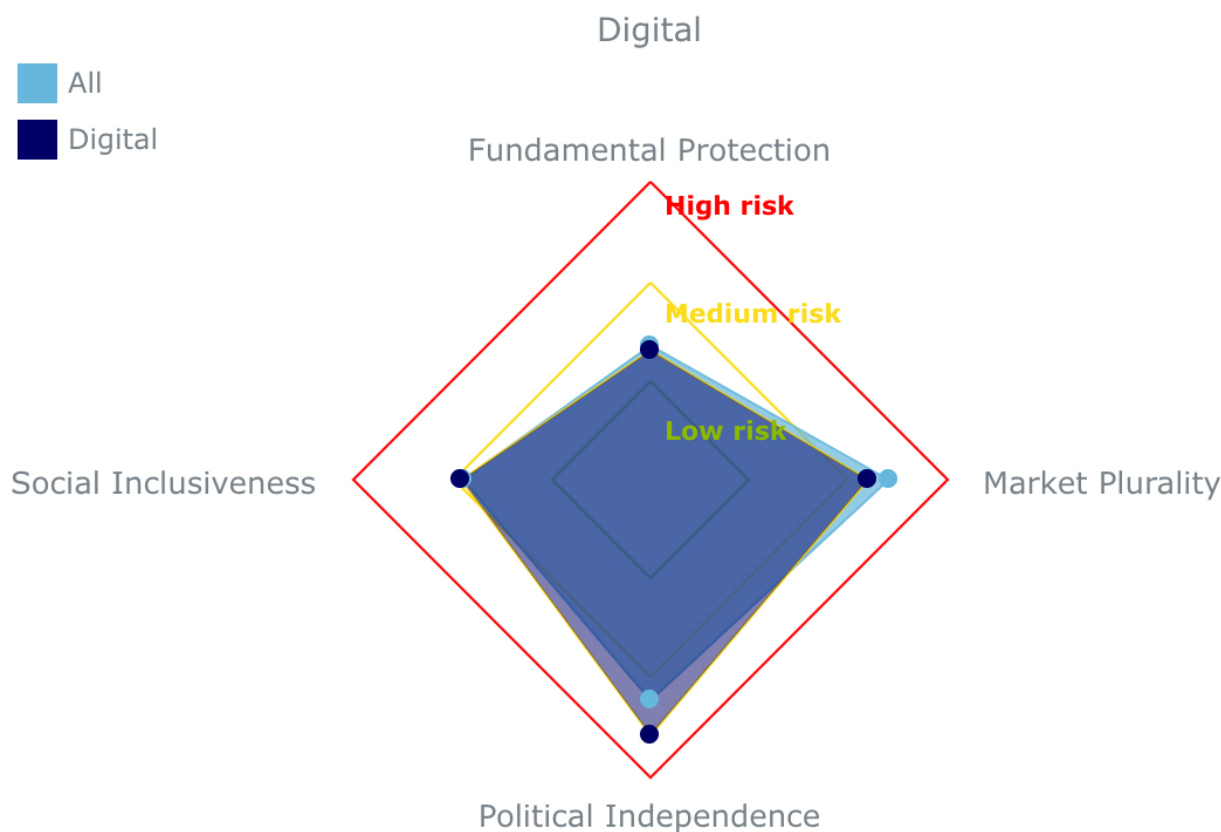
Regulations that harmonise with national and international conventions should, in theory, provide enough protection against several variations of illegal and harmful content. An example is Section 332 of the Criminal Code (Act C of 2012 on the Criminal Code) which regulates hate speech ("Incitement Against a Community"). However, in practice, the law is not capable of stopping the spread of these sorts of messages and media content, and the government itself is often actively stigmatising minority groups in its

communications (for a detailed description, see Article 19, 2018). One of the reasons for the lack of effectiveness is the inconsequential practice of judiciaries, which take action against certain Facebook-posts, while dismissing others altogether. Another reason is that on social media platforms, there are a multitude of messages that count as illegal or harmful speech, and currently it is impossible to limit them, neither by law nor by technology. The typical disinformation in 2021 was related to the sources and effects of the pandemic, vaccination, 5G networks and the Qanon-theory. After the 2020 attempt to fight disinformation with a controversial amendment to the Criminal Code (Act XII of 2020, which amended Section 337 of the Criminal Code), no major legal or policy measures were taken against disinformation in 2021 (even though national elections were planned for early 2022). Facebook removed some online pandemic-skeptical, and anti-vaccine Facebook-groups, and recently banned the page of the radical right-wing party, Mi Hazánk Mozgalom's (Our Homeland Movement), for unknown reasons days before the elections. In 2022, the war in Ukraine sparked the spread of anti-Ukrainian disinformation (often originating from Russian media). While the NMHH pledged to take action against RT and Sputnik (in accordance with the European Council's regulation), Russia-friendly disinformation was rampant, and many government-aligned media channels reportedly embraced shared the same fabricated stories (Zöldi, 2022; Bayer, 2022, Political Capital, 2022). In March 2022, two non-governmental organisations (the Hungarian Civil Liberties Union and Political Capital) filed a joint complaint to the European Commission for the presence of Russian disinformation in the Hungarian public service media, with clear examples of RT and Sputnik quotes in the PSM (Kapronczay, 2022). In their assessment, Szicherle & Molnár (2022) found evidence of excessive inauthentic online behaviour in Hungary, with many fake accounts that spread content (often generated with online translation software) that resembled the official narrative of the Kremlin.

The country's first dedicated, independent fact-checking site, called Lakmusz.hu, was launched with the support of EDMO (the European Digital Media Observatory) and the European Commission, relying on the expertise of the French news agency Agence France Presse (AFP). AFP's Hungarian-language fact-checking site Ténykérdés is available since 2021. The Hungarian public service media has launched its own fact-checking service (Hirado.hu, 2022), which, however, is seen as providing politically motivated commentary instead of objective fact-checking (Diószegi-Horváth, 2022).

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

Hungary: Media Pluralism Risk Areas



JS chart by amCharts



Just as in the last two years, the MPM dedicates a separate section for assessing risks for media pluralism in the digital environment and amongst online media. Many issues emerged in the past few years, not only in academic but also in public discussions, as the challenges of the digital world are poorly addressed by Hungarian regulation and policy making. Certain topics, such as the regulation and taxation of digital platforms, or securing online privacy are on the political agenda, but most proposals are only seen as part of political rhetoric, and are not put in action. Regarding the entire media ecosystem, there aren't any specific regulations for online media, or any regulations which would try to deal with the challenges of the digital world specifically. This is true for almost all the areas and indicators of the MPM. In the year 2021, a new risk became public: a journalistic investigation revealed that well-known Hungarian journalists, as well as activists and politicians, were surveyed by Hungarian authorities with the Pegasus spyware. The highest risk is registered in the political independence area with 86%.

Most of the problems in the digital realm were discussed in length in the previous sections, in this section we describe the highlights, to show what factors lead to digital risks in Hungary.

Fundamental Protection (44% medium risk)

The indicators on fundamental protection online all score medium risk, which is more or less in line with the overall scores for this area: Protection of freedom of expression online scores 44%, Journalistic profession, standards and protection 50% and Universal reach of traditional media and access to the Internet is the lowest at 36%.

The internet penetration in Hungary is 91%, universal access to broadband has not been achieved yet. Hungary operates under EU legislation regarding net neutrality, and the Media Authority also published a decree on the Rules of Contracts of Electronic Telecommunications 2/2015, which specifies directives and rules regarding net neutrality. The decree rules that ISPs shall guarantee and secure the qualities and quantities quoted in the terms and conditions and the individual contracts. The decree also obliges the ISPs to publish in publicly available, tabulated form their tariffs and guaranteed speed and update them if changes occur. The introduction of the GDPR in Hungary caused minimal problems for most of the media companies. At the same time, digital platforms like Facebook regularly sell data on citizens to questionable companies and political parties. These issues are still not addressed on the political level in Hungary.

Protection of journalistic work is very weak in Hungary on many levels. Online bullying and harassment (often of a sexual nature) is common, especially against female journalists. While, formally, surveillance of citizens is very difficult for state security agencies, we have seen in the past few years that countries take giant steps towards total surveillance by connecting databases, digital fingerprints, CCTV footages, voice recordings. An international journalistic investigation exposed the use of the Pegasus spyware against journalists in Hungary, which may have a significant chilling effect on journalists in Hungary, as it may jeopardise the security of journalists and their sources, lead to self-censorship, and might create an additional financial and operational burden for news outlets that are involved in investigative journalistic activities. Libel and defamation could still be considered criminal acts in Hungary according to the Criminal Code's (Act C of 2012 on the Criminal Code) paragraphs 226, 227. In June 2021 a Hungarian blogger, Kristóf Marton was sentenced to 10 months in prison for a Facebook post shaming three police officers.

Market Plurality (73% high risk)

For market plurality online, the situation is slightly (by 7 percentage points) better than in the analogue media market - in part because the digital media market is somewhat less concentrated and more competitive than traditional media, with many independent voices. The digital score for four of the indicators of Market plurality confirms the high level of risk: Transparency of media ownership (88%), News media concentration (77%), Online platforms concentration and competition enforcement (75%) and Commercial & owner influence over editorial content (75%). A key problem is the fact that Hungary does not have any platform-specific regulation for preventing online platform concentration. Enforcing competition in any market is the task of the economic competition authority, but its mandate does not extend to supranational actors, like Facebook or Twitter.

Media viability is medium risk (50%) which is below the indicator's overall score (75%), as the online advertising market is constantly growing. Still, risks persist: according to the Hungarian Advertising Association - around 65% of the online advertising revenues were skimmed by Facebook and Alphabet in 2021, and their share have been growing annually in the past years. As an alternative, online newsrooms are experimenting with new revenues. The role of crowdfunding, subscriptions and alternative sources of revenues continued to increase in 2021. In 2020, Telex, the news site founded by ex-Index journalists, started its operation with a crowdfunding campaign - its public report from late 2021 shows that the company managed to gather substantial revenues that can guarantee its sustainable operations for the years to come (Telex, 2021). The example of Telex and the successful paywalls launched by outlets like HVG and 444 show that it seems that an ever growing part of Hungarian society realises that without their help, the space to sound democratic public opinions would continue to shrink.

Political Independence (86% high risk)

Two digital indicators on political independence score high risk: Political independence of media (97%), and Independence of PSM governance and funding (97%) - the latter due to a lack of rules on the PSM's online mission. Audio visual media, online platforms and elections (63%) is somewhat under the threshold of high risk. Although online media is the most diverse segment in Hungary, and, in general, online outlets experience more political independence than in other segments, still the risks are quite visible. KESMA owns the top-4 news site Origo.hu, one of the most vocal pro-government sources (CEPMF, 2021) - other prominent sites owned by KESMA are Mandiner.hu and 888.hu. There are many other digital native outlets which are strongly pro-government, like Pestisrácok.hu. Since its capture in the fall of 2020, another top-4 online news outlet, Index.hu is also seen as "undoubtedly part of the government-linked media empire" (Helsinki, 2021) - in late 2021 an editor resigned after the outlet published a string of articles about the opposition's alleged corruption scandals, which were produced by entities outside the newsroom (Spirk, 2022). When it comes to outlets critical of the government, we can also find examples of clear political ties, such as Nyugati Fény (Democratic Coalition) or Ez a lényeg (Socialists).

Social media political advertising is getting more and more popular amongst political actors in Hungary. The data provided by Facebook on political advertising is still questionable and it is easy for political parties to evade rules by using proxies and intermediaries. Digital media, at the first glance, offer more equal, and democratic conditions for political parties in Hungary, because social media platforms are not influenced by the government. But this democratisation of the public sphere is a double-edged sword, because large social media platforms increase the voice of those who have financial means, regardless of the value and the truthfulness of their messages. According to news media reports, the governing party outspent the opposition on Facebook and Google (Youtube) during the election campaign. Aside from political parties, a number of government-aligned news publishers (some of which are part of KESMA) and a private organisation called Megafon are actively promoting political content on Facebook - the latter has spent more than EUR 10 million during the campaign (Tamás and Herczeg, 2022). In the past year, a politician of the governing party was scrutinised for exceeding the allowed campaign budget with her social media posts, however, the Hungarian State Audit Office (ÁSZ) found no sign of wrongdoing, as social media advertising is not considered political advertising in Hungary. According to a report by RTL, the ÁSZ has already raised the issue of regulating social media political advertising in 2020, but there was no political support (Vorák, 2021).

Social Inclusiveness (64% medium risk)

Digital-specific risks in the area of Social inclusiveness derive mostly from the assessment of digital competencies of the population (50% - medium risk) and from the limited effectiveness of measures taken to combat disinformation and hate speech against vulnerable groups online (77% - high risk). In Hungary, the percentage of the population that has basic or above basic overall digital skills is 49, which represents a medium risk, and 31% of the population has very low overall digital skills - just like last year (Eurostat, 2021).

While there are Hungarian laws that were introduced with the aim of countering hate speech (such as Section 332 of the Criminal Code, Act C of 2012; changes were made to the text in October 2016, in compliance with the EU Council Framework Decision on Combating Racism; this expanded the provision to include "incitement to violence" alongside "incitement to hatred", and it also included protections in cases

where individual members of protected groups are targeted, see Article 19, 2018).) Hate speech cases were ruled on very strictly both by the courts and the Media Council; For example, in 2017, the government-aligned Echo TV was given a HUF 500,000 fine for airing a report in which members of the Hungarian Islamic Community were described as criminals (Hirado.hu, 2017), the government-friendly pundit Zsolt Bayer had to pay a fine of HUF 250,000 for encouraging the forceful eviction of civil society activists from the parliament building (Index, 2017), in 2022 two editors of the government-friendly Magyar Nemzet received a one-year suspended prison sentence for describing an opposition politician as an “organism” that “spreads bacteria” in the parliament (Herczeg, 2022). Still, there is an alarming trend of hate speech against ethnic minorities (mostly Roma, and immigrants). Moreover, disinformation is a growing concern, both in the context of the COVID-19 pandemic and the war in Ukraine. Looking at these experiences in Hungary, we can conclude that the current state of the digital environment, despite all of its advantages, can be risky to the democratic public. As a positive development, it can be mentioned that the country’s first dedicated, independent fact-checking site, called Lakmusz.hu, was launched with the support of EDMO (the European Digital Media Observatory) and the European Commission, relying on the expertise of the French news agency Agence France Presse (AFP).

5. Conclusions

Media pluralism in Hungary has been degrading since 2010. Our assessment of the year 2021 shows slight improvements, but these are not due to reforms or a reversion of the trends of the last decade, but a slight recovery from the shock and the emergency measures of the COVID-19 pandemic. The greatest risk in the country was recorded in the Political independence area, with a 74% score - not just the area as a whole but all its indicators score high risk.

The ruling party exploits its powers as it is supported by a two-thirds majority in Parliament, and is willing to override any law by decree in order to reach its political goals. Moreover, the ruling coalition is also able to use substantial amounts of public funds to organise communications campaigns or provide financial support to the aligned media, thereby distorting the public sphere and weakening media pluralism. The media regulator is under strong political control. In October 2021, the President of the Media Authority and its Media Council, Mónika Karas resigned one year early, so that a successor can be appointed by the Fidesz parliamentary majority prior to the election in 2022 (Vaski, 2021a). Her successor, for a 9 year term, is András Koltay, the former rector of the University of Public Administration (MTI-Hungary Today, 2022), a nominee of the prime minister. The Hungarian law does not include any regulation against the online harassment of journalists. Online harassment is common, especially against female journalists (Botás, 2021 and Rutai, 2021). In addition, an international journalistic investigation has proven that Hungarian authorities had used the Pegasus spyware to hack into the phones of investigative or political journalists who worked on issues related to political corruption (Koskinen, 2021). Many of the problems that were registered in Hungary started appearing in other European countries, such as Poland, Slovenia or Macedonia. This means that we are not experiencing an isolated phenomenon. To mitigate these risks and secure media pluralism in members and candidates, the Commission needs to act against problematic issues, such as the politically motivated allocation of state advertising or the competition distorting practice associated with the media conglomerate KESMA. We hope that the European Media Freedom Act will provide a solution to these problems.

Based on our MPM analysis we add some recommendations to the main areas discussed in the report. As the problems of last years persist, we reiterate many of our earlier recommendations.

Fundamental Protection

While we find that the regulatory framework regarding freedom of expression and freedom of information is generally acceptable, the implementation could be better, and in practice many state bodies simply fail to fulfill their obligations stipulated in the laws.

Recommendations:

- **The Hungarian government should find solutions to enforce the state bodies' and other state-related organizations' compliance with the laws.**
- **The Freedom of Information Act should be updated, and the law should stipulate how public information and data can be released, including the specification of file formats and clear definitions of readability and usability.**

Market Plurality

The Hungarian media market is still weak and the news media market is concentrated in the hands of a few entities dependent on the governing party - state advertising is used as a form of covert subsidy by the government. While the online advertising market is growing, most of its revenues are skimmed by Facebook and Google.

Recommendations:

- **One solution could be a European media funding or media support mechanism that covers operational costs for independent news outlets. Besides the EU institutions, we also would like to raise the attention of international donor organisations towards the state of Hungarian media, and ask them to consider the Hungarian public sphere when deciding on their funding strategies.**
- **Local and regional media should play a key role in media support decisions.**
- **EU rules related to anti-competitive behaviour should consider the market-distorting effects of KESMA and other dominant government-aligned media owners.**

Political Independence

In many cases, political dependency comes hand-in-hand with financial vulnerability. The governing party uses its financial position to capture independent outlets and to support its own mouthpieces. Many commercial advertisers depend on the government's sector-specific regulation as well as the government's stick-and-carrot strategy; thus, market players often include political considerations in their business decisions.

Recommendations:

- **The fairness of state advertising should be guaranteed on the European level. We ask the European Commission to look for solutions and means to regulate the use and abuse of state funds in the national media markets. If the current European regulation on fair competition is not sufficient enough to restrain these market distortion practices, then this practice might have to be addressed in a new regulation.**
- **The EU needs to put a greater emphasis on regulating political advertising online (including the targeting of political ads). The Hungarian government should take steps to put an end to the laissez-faire situation related to political campaigns on social media.**
- **Regulation of political advertising should also consider third-party ads and government messages that are often misused for political campaigning.**
- **The independence of the PSM, the state news agency and the media regulator should be guaranteed. The EU should think of measures that lead to the enforcement of the rules of objective journalism in PSM.**
- **Independent journalist associations and watchdogs should be supported.**

Social Inclusiveness

While the Social Inclusiveness area only shows medium risk, there are some issues that raise concern. Women are still underrepresented in the journalistic profession and women's access to the media is limited. At the same time, hate speech and disinformation cause great concern - including on mainstream media.

Recommendations:

- **In light of the emerging threats posed by disinformation as well as the unclear impact and limited reach of current efforts, the European Union should support larger-scale media literacy programs for all age groups.**
- **Further resources should be invested in media for minorities.**
- **The government needs to stop the production and financing of disinformation - even if its spread furthers its short-term political goals.**

In addition, the EU and the national government should encourage research and data collection on a number of issues related to the Hungarian media sphere, as a number of key issues are undercovered - and a lack of information adds to the risks to media pluralism. Research would be crucial, among others about:

- Media use and media representation of minorities and women.
- Media market trends and funding of news media.
- SLAPPs.
- Audience preferences, news consumption habits, and informedness about key issues of public life.
- Hate speech cases in the country.
- Media literacy levels and resilience to disinformation.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 CT Leader
<i>Attila</i>	<i>Bátorfy</i>	<i>MPM Hungary leader</i>	<i>Eötvös Loránd University, Media Department</i>	X
<i>Konrad</i>	<i>Bleyer-simon</i>	<i>Research Associate</i>	<i>European University Institute</i>	
<i>Krisztián</i>	<i>Szabó</i>	<i>Research Assistant</i>	<i>Eötvös Loránd University Media Department</i>	
<i>Eszter</i>	<i>Galambosi</i>	<i>Research Assistant</i>	<i>independent researcher</i>	

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 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>Péter</i>	<i>Bajomi-Lázár</i>	<i>Associate Professor</i>	<i>Budapest Business School - Department of Communication</i>
<i>Ágnes</i>	<i>Urbán</i>	<i>Associate professor</i>	<i>Corvinus University of Economics - Budapest</i>
<i>Krisztina</i>	<i>Rozgonyi</i>	<i>Associate professor</i>	<i>University of Vienna, Media Governance and Media Industries Research Lab</i>
<i>Tamás</i>	<i>Tófalvy</i>	<i>Assistant professor</i>	<i>Budapest University of Technology and Economics - Department of Communication</i>
<i>Károly</i>	<i>Nagy</i>	<i>Researcher</i>	<i>Transzparens Újságírókért Alapítvány</i>
<i>Levente</i>	<i>Nyakas</i>	<i>Head of Institute</i>	<i>Institute for Media Studies at National Media and Infocommunications Authority</i>

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