

# MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

## APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2022

Country report: Greece

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**Research Project Report**

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# 1. About the project

## 1.1. Overview of the Project

## 1.2. Methodological notes

### Authorship and Review

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

*In Greece the CMPF partnered with Lambrini Papadopoulou (National and Kapodistrian University of Athens), Dr Ioannis Angelou (National and Kapodistrian University of Athens; University of Western Macedonia), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.*

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

<b>Fundamental Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate 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 digitally specific risk scores, and the report contains a specific analysis of the risks that 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 the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default,*

in order to avoid an assessment that offers a total absence, or certainty, of risk.

### **Methodological Changes**

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. For the MPM 2023, no major changes were made to the questionnaire, except for the Indicators Transparency of Media Ownership, Plurality in Digital Markets and Editorial Independence from Commercial and Owners Influence (Market Plurality area), and Protection Against Disinformation and Hate Speech (Social Inclusiveness area). The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

In the Market Plurality area, the names of three Indicators have changed. The former indicator on "News Media Concentration" is now named "Plurality of Media Providers"; "Online Platforms and Competition Enforcement" has been renamed as "Plurality in Digital Markets"; "Commercial & Owners' Influence Over Editorial Content" has been renamed as "Editorial Independence from Commercial and Owner Influence".

**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 who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2023 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 MPM2023, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

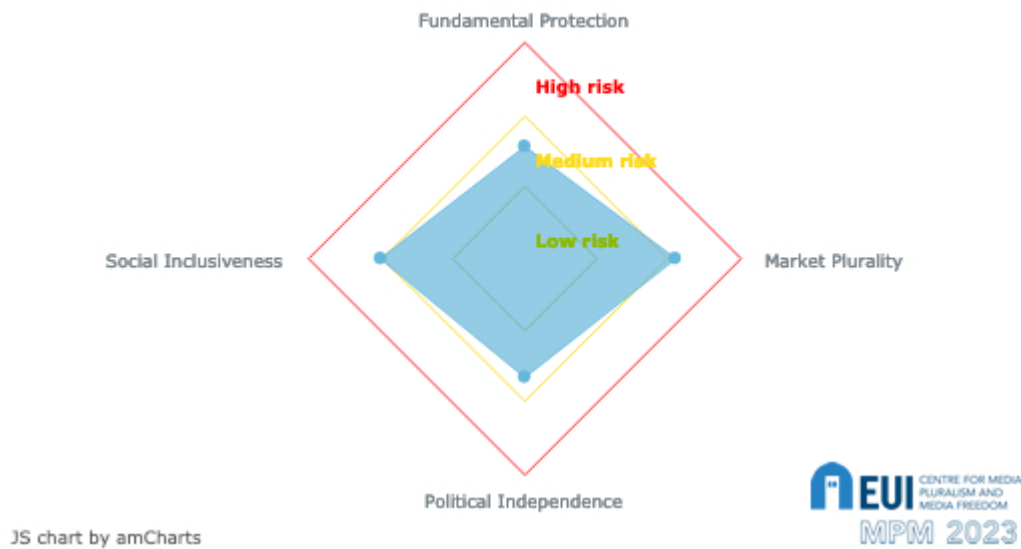
## 2. Introduction

- **Country overview:** The total population of Greece, according to the 2021 census, is estimated to be 10.48 million inhabitants<sup>[1]</sup>. The territory comprises around 132,049 square kilometers. More than one-third of the population (35,4%) lives in the capital region of Attica.
- **Languages:** Modern Greek is the official language spoken in the whole territory.
- **Minorities:** Based on the 2011 census<sup>[2]</sup>, in Greece there are around 912,000 permanent foreign residents, including Albanians (480,851), Bulgarians (75,917), Romanians (46,524), Pakistanis (34,178), Georgians (27,407), Ukrainians (17,008) as well as smaller groups from other countries. The only officially recognized minority in Greece is the Muslim minority of Thrace, with an estimated population of 100,000 persons.
- **Political situation:** Since the 2019 elections Greece has been governed by the right-wing party of New Democracy (ND) that won 158 seats in the 300-seat Hellenic Parliament, allowing the party to form a government on its own under Prime Minister Kyriakos Mitsotakis. The Greek parliament currently is made up of six parties<sup>[3]</sup>.
- **Economic situation:** According to the Hellenic Statistical Authority (ELSTAT) GDP for 2021 in volume terms amounted to 192.6 billion euro<sup>[4]</sup> compared with 181.7 billion euros for 2020<sup>[5]</sup> recording an increase of 6%. The increase in GDP was primarily driven by growth in investment and consumption<sup>[6]</sup>. The annual inflation rate for 2022 in Greece was 7.2%<sup>[7]</sup>. Despite the increase in the GDP, the overall situation for the country's working force doesn't seem to improve much, since in December 2022 the unemployment rate in Greece was estimated at 11.6% and was considered to be (together with Spain) the highest in the Eurozone with the amount of jobless people amounting to 545,000<sup>[8]</sup>.
- **Media market:** According to the latest Reuters Institute for the Study of Journalism Report (2022), the media market in Greece is characterised by digital fragmentation, lack of trust in news, high perceptions of undue influence, and high use of social media for news. The majority of Greece's audience (90%) gets the news through online media (including social media) and only 21% replied getting the news by print outlets. 42% of the respondents said that they share news via social, messaging or email. Trust in news further decreased by five percentage points in Greece (27%) and the country is well behind most other countries in trust (42th place out of 46 countries). According to the Standard Eurobarometer 94 (Winter 2020 - 2021), the proportion of respondents reporting they watch TV on a TV set every day or almost every day is estimated at 73%, the proportion of people listening to the radio every day or almost every day has risen particularly and is estimated at 42%. Levels of trust in television were lowest in Greece (25%), whereas trust in the Internet has grown notably (54%, 12 percentage points). 60% of the respondents consider that the national media does not provide trustworthy information. Finally, regarding public media, 52% of the respondents believe that the statement that public service media are free from political pressure does "not at all" reflect the situation in their country (Eurobarometer 94, 2020-2021).
- **Regulatory environment:** While the Greek government has issued new laws to improve media

ownership transparency, limited access to ownership details and opaque regulations remain a concern. However, Greece has transposed the Audiovisual Media Services Directive to protect against incitement to violence or hatred. Despite a well-developed legal framework, Greece lacks a self-regulatory code on online hate speech or racist crimes. Nevertheless, existing mechanisms to report such cases are efficient and follow clear rules. The main media authority in Greece, the National Council for Radio and Television (ESR), is facing challenges due to abstract legal provisions, limited resources, and political interference risks. The ESR's malfunctioning has been also pointed out by the 2022 World Press Freedom Index.

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

Greece: Media Pluralism Risk Areas



Media pluralism and press freedom in Greece are in a state of constant crisis as depicted for one more year in the current report. This year, journalists' digital safety saw a dramatic deterioration as Greek journalists were digitally surveilled with the use of spyware Predator, in a scandal dubbed the "Greek Watergate"<sup>[9]</sup>. Also, various investigative journalists working at small and independent media became targets of SLAPP lawsuits, some of which were filed by Greek PM's former general secretary<sup>[10]</sup>. Media capture continued to promote an one-sided narrative in favour of the government and exclude opposition or dissident voices. Various journalists pointed out that they are facing retaliation by the country's government for reporting on issues deemed harmful to Greece's reputation<sup>[11]</sup>. With regards to issues of media ownership transparency, although there were a few steps towards this direction with the enforcement of new laws, their effectiveness remains to be seen. This year the Greek government initiated a new program to provide financial support to national, regional, and local media outlets in Greece. In the present report, Market Plurality scored once again in the high-risk category. Moreover, out of the 20 indicators, 18 reached the medium risk category and seven the high risk.

**Fundamental Protection** is characterized- just like last year- by a medium risk (52%) showing that the necessary preconditions for media pluralism and freedom were once again not respected in practice. For instance, journalists' right to information was violated numerous times as many government ministers stopped in-person press conferences -due to the pandemic- and chose speeches and announcements from television, instead of answering directly to journalists' questions. Moreover, journalists from certain media were regularly being blocked from asking questions at press conferences<sup>[12]</sup>. Greece's main media authority in broadcasting field (The National Council for Radio and Television-ESR) continued to malfunction, an issue also pointed out by the 2022 World Press Freedom Index<sup>[13]</sup>. It is of particular concern that "journalistic profession, standards and protection" continues to be the indicator with the highest risk score in this area, (69%) as various journalists were subjected to digital surveillance, harassment, intimidation, and physical attacks -mainly by police authorities- because of their investigative work.

Greece's **Market Plurality** is at high risk, with a score of 70%, mainly due to two high-risk indicators, namely Plurality in digital markets and Editorial independence from commercial and owner influence, while



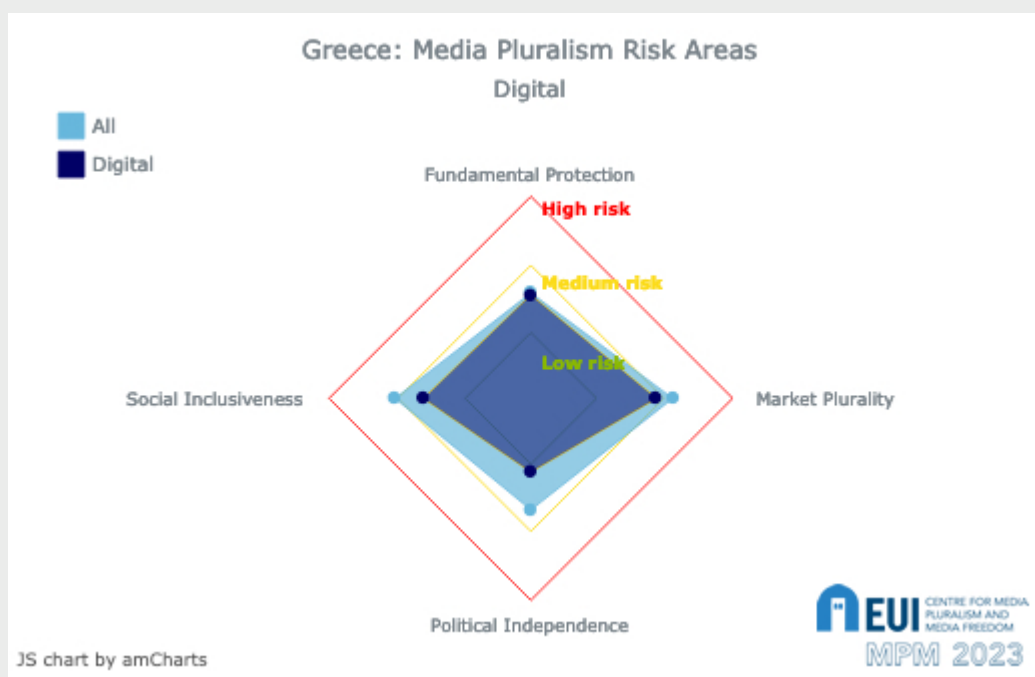
the other three indicators, Transparency of media ownership, Plurality of media providers, and Media viability, present a medium risk. Greece's media ownership transparency remains a concern as there is limited access to ownership details and opaque regulations regarding this issue. Although recent laws and initiatives may help improve transparency in the future, their full impact is yet to be seen, and current limitations on public access to ownership registries may hinder progress. The indicator that measures horizontal and cross-media concentration (Plurality of Media Providers) scores medium risk, at 62%, as the legal anti-concentration framework does not cover all media. Moreover, data transparency seems problematic. The Media viability indicator in Greece decreased from a high-risk assessment of 74% to a medium-risk assessment of 57% compared to the previous year. Based on the data provided by Media Services upon request, the revenue of radio, newspapers, and press agencies was stationary in the past year, but precise estimates of total revenues for the audiovisual and local media sectors are unavailable due to a lack of publicly available data. The indicator for editorial independence from commercial and owner influence has increased to 92%, indicating a high risk. Overall, the lack of legal and self-regulatory measures presents significant risks to editorial independence and protection of journalists from commercial influence. Greece shows a high risk of 86% for the Plurality in digital markets indicator due to the lack of publicly available data on online advertising and audience shares of top online players. Although the recent incorporation of EU Directives provides guidelines for copyright and related rights, it does not include specific provisions for digital news media concentration. Financial agreements between digital intermediaries and media providers are not publicly accessible, which indicates the ineffectiveness of the law. Greece has a serious lack of official data on news media concentration, and most legislation applies only to specific media. Digital native media is not covered by Law 3592/2007.

The **Political Independence** area shows a medium level of risk (55%) which is lower than last year (66%). This change can be attributed to the Greek government's various efforts to regulate resources to media in a fair and transparent way, after the scandal with the so called 'petsas list'<sup>[14]</sup>. Nevertheless, this year the Greek government further strengthened its control on the country's one and only news agency, the Athens-Macedonian News Agency (ANAMPA), by adding two more members at its Board both of which would be appointed by the government. The indicator 'editorial autonomy' shows the second highest worrying risk score in this report (88%) which is directly connected with the occasional political interferences in the editorial content and the appointing and dismissing of editors-in-chief in various media.

**Social inclusiveness** in Greece is the second-highest risk area with a risk score of 67%, mainly due to three high-risk indicators, namely Representation of minorities in the media, Gender equality in the media and Media literacy. Specifically, Greece shows a high-risk score of 79% for the representation of minorities in media, indicating that the Muslim minority in Thrace and historical minority populations such as the Vlachs, Arvanites, or Slavic-speakers lack national news in their languages. Furthermore, the policy on accessibility of media content for people with disabilities is underdeveloped in Greece. The risk score for local/regional and community media has decreased significantly from last year, indicating that the introduction of a new funding program for national, regional, and local media outlets in Greece has been a step forward. However, the effectiveness of the funding program and the registration process cannot be evaluated until they have been in operation for some time. Community media is not recognised as a distinct media group alongside private and public service media in Greek media. Nevertheless, in recent years, we have seen the emergence of a few media that are independent and are trying to hold those in power accountable (Papadopoulou, 2019;2020)<sup>[15]</sup>. Greece also shows a high-risk score of 83% for gender equality in the media, indicating that women are underrepresented in executive positions and management boards. Moreover, male experts are more often invited by media to comment on political and relevant matters than female experts, reflecting a lack of formal rules on gender balance in reporting and news content. On top of

that, women are portrayed in a highly stereotypical and sometimes derogatory manner in news, particularly in far right-leaning media (Siapera and Papadopoulou, 2021). Media literacy is an underdeveloped or poorly implemented policy in Greece, with a high risk score of 67%. Although media literacy is widespread in non-formal education, it is not yet widely recognized as a key skill and is often overlooked. More efforts are needed to promote media literacy and integrate it into the education system. Last, the medium risk score of 54% for the indicator Protection against disinformation and hate speech, indicates that Greece is one of the most vulnerable countries in Europe to misinformation and fake news. The country's fight against disinformation is still at an early stage and self-regulatory frameworks to counter hate speech online are not widely implemented. Greece is ranked fourth in the lowest category in Europe and lacks specific provisions to tackle disinformation. More efforts are needed to combat disinformation and fake news in Greece.

### Focus on the digital environment



Regarding **Fundamental Protection** in the digital environment, the risk is 51%, more or less the same with the previous report (49%). This year journalists' digital safety was assigned a high risk (100%) as various Greek journalists said to have been targeted by the spyware Predator, which has been reportedly acquired by the Greek intelligence services <sup>[16]</sup>. Moreover, online threats and attacks against journalists -and specifically women journalists- represent a significant problem in the country. At the same time, however, initiatives against hate speech are limited and somehow inefficient. Following the EU ban on Russia media, Greece banned "Russia Today" and "Sputnik" news networks.

The **Market Plurality** area in the digital environment currently has a medium risk score of 62%, marking a 13-percentage point decrease from the previous year's score of 75%. The absence of publicly available data on online advertising and the audience shares of the top online players continues to be a significant issue. Additionally, the regulatory framework has lagged in keeping pace with the rapidly evolving digital markets and their influence on the media environment, which is a major concern. To address this, Law 5005/2022 has been introduced to establish two registries that would disclose media ownership to the public. Nevertheless, the effectiveness of these registries

remains uncertain as they are not yet available.

At the time of the reports' final draft, sufficient and updated information to identify the beneficial and ultimate owners of digital native news media outlets were not publicly accessible. Furthermore, no data on the audience shares of the top4 Greek online players is publicly available. **Political Independence** in the digital context shows a risk of 36%, significant higher than last year (21%). The subindicator political advertising online, shows a risk of 58% as domestic legislation does not contain provisions mandating national political parties to make available on their websites information specifically on their expenditure for online platforms. As a result, there is a lack of transparency on spending and on techniques used in political campaigning. Moreover, there were some issues with the implementation of transparency policies on political advertising by online platforms. Turning to access to internet, 91.7% of households are covered by broadband and the average Internet connection speed is 39.31 mbps. Finally, 52% of the population has basic or above basic overall digital skills and according to the Media Literacy Index 2022, Greece is one of the most vulnerable countries in Europe to misinformation and fake news as it ranks in 30th place among 41 countries. The subindicator Digital competencies shows a risk of 50%. Greece has a good legal framework against hate speech, but lacks a self-regulatory code for online media. Existing mechanisms to report hate speech are efficient but not widespread. Greece is vulnerable to misinformation and fake news, and despite the existence of three fact-checking initiatives the extent of disinformation in the country remains problematic.

The **Social Inclusiveness** area in Greece's digital environment shows a medium risk score of 53%. The country is regarded as one of the most vulnerable to misinformation and fake news in Europe, and the public has limited fact-checking abilities and understanding of the negative consequences of sharing fake news. Furthermore, only 52% of Greece's population has basic or above basic digital skills (Eurostat, 2022). The country lacks specific measures to address disinformation, and self-regulatory frameworks to counter online hate speech are not commonly used. Greece is ranked fourth in the lowest category in Europe, along with Turkey and other Balkan countries. However, there is a positive development as MedDMO in Greece has been chosen by the European Digital Media Observatory as one of six new hubs to combat disinformation, and the disinformation monitoring initiative is scheduled to start in early 2023.

### 3.1. Fundamental Protection (52% - medium risk)

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



The general risk score for the **Fundamental Protection** area in the MPM 2023 is 52%, which is in the medium-risk range, the same risk score as last year (Papadopoulou, 2022). Except for “Journalistic profession, standards and protection”, which is once again assessed as high risk (69%), and “Universal reach of traditional media and access to the internet”, which shows a low risk (33%), the rest of the indicators present a medium risk.

The indicator **Protection of freedom of expression** is assessed with a medium risk (55%), which is slightly higher compared to last year (49%). Freedom of expression enjoys good levels of protection *de jure*. In practice, however, several issues continue to remain problematic. For starters, defamation continues to constitute a criminal offence. Moreover, in the case of an alleged violation of fundamental rights, there is no specialized court to which one can resort. Various cases against Greece found a violation of Article 10 European Convention on Human Rights (ECHR) <sup>[17]</sup>. In December 2022, the Greek government withdrew and reformed the provision of article 191 of the Penal Code <sup>[18]</sup>. However it is not yet possible to estimate whether there has been any improvement in practice.

The indicator **Protection of right to information** shows a medium risk (42%), which is higher compared with last year (35%). The right to information is explicitly recognised in the Greek Constitution. However, this right was not respected in practice. Specifically, many government ministers seem to have used the pandemic as a pretext to pause in-person press conferences, a practice followed by various other governments all around the world that aimed at limiting the right to information and silencing critical reporting (Papadopoulou and Maniou, 2021) <sup>[19]</sup>. Moreover, critical media <sup>[20]</sup> were excluded from posing

questions to the PM during a presentation of his political program. A significant development was the transposition of the 2019/1937 EU Whistleblowing Directive in the Greek legal order<sup>[21]</sup>. However, it is not possible yet to value its effectiveness. Moreover, there have been no general awareness-raising activities about the available whistleblowers' protection.

The situation of the **Journalistic profession, its standards and protection** presents a high risk (69%) which is lower than last year (74%). Last year's worse risk assessment was connected with the assassination of a Greek journalist, Giorgos Karaivaz<sup>[NOTA\_2598]</sup>. During 2022, several violent incidents took place as journalists were assaulted, arrested and detained, and media premises were attacked<sup>[22]</sup>. Moreover, as Greece has no legal framework against strategic lawsuits against public participation (SLAPPs), multiple journalists and independent media became targets<sup>[23]</sup>. PM's Secretary General filed defamation lawsuits against several journalists and publications shortly after resigning<sup>[24]</sup>. Other journalists that covered the Greek government unfavourably became targets of slander. Some of them admitted that the country's government is retaliating journalists who report on issues deemed harmful to Greece's reputation<sup>[25]</sup>. Finally, working conditions remained unsatisfactory this year and according to various journalistic associations they are to be worsened, as a new law is about to create a more unfavourable environment for media professionals. Specifically, the law states that national licensed television stations of general content should employ 400 employees, of which only 240 will be direct employees and the rest will be able to be employed from affiliated and production companies.

**Independence and effectiveness of the media authority** presents a medium risk (63%) which is exactly the same as last year. The National Council for Radio and Television (ESR) is the main media authority in Greece's broadcasting field. Abstract legal provisions, combined with limited resources and personnel, hamper the effective discharge of the authority's monitoring duties, although the tasks and responsibilities of the media authority are defined in law. Moreover, the appointment procedures for its members cannot preclude the risk of political interference. It should also be noted that ESR was granted the new responsibility of imposing sanctions on the press, which was highly criticised as it could also be considered unconstitutional<sup>[26]</sup>. The malfunctioning of ESR was also recognised by the 2022 World Press Freedom Index<sup>[27]</sup>. In 2021, ESR issued 209 decisions<sup>[28]</sup>.

A low-risk score of 33% is attributed to the indicator of **Universal reach of traditional media and access to the Internet**, which is slightly lower than last year (38%). Domestic legislation guarantees universal coverage of public service media (PSM), and according to the EETT 2021-2022 Open Internet Report<sup>[29]</sup>, net neutrality is overall respected. Moreover, 91.7% of the population is covered by broadband, while the average Internet connection speed is estimated at 39.31 Mbps. Mobile operators publicised interactive speed maps through which the user can search by address and find out the maximum speed in the area of interest.

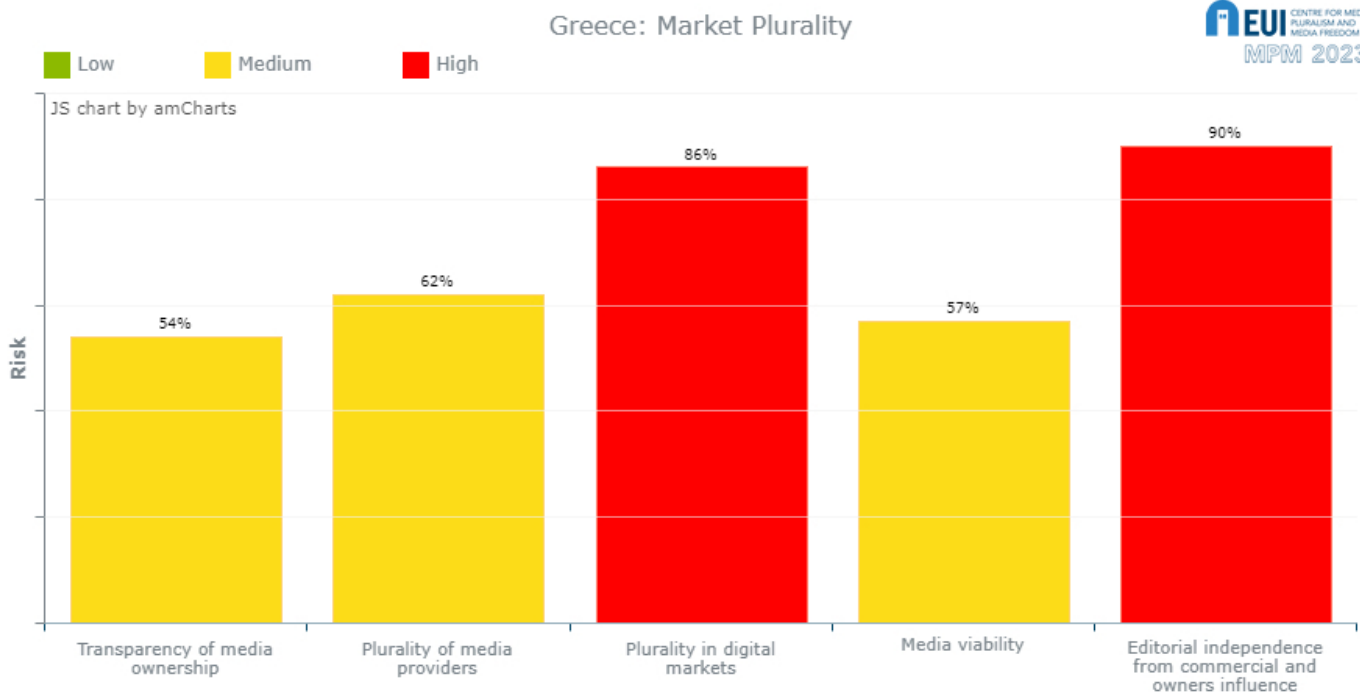
### Focus on the digital environment

The risk assessment for **Fundamental Protection** in the digital environment is 51%, showing a slight increase compared to the previous report (**49%**). Specifically, Guarantees for freedom of expression (FoE) online are assigned a medium risk (50%) as Art. 14(1) of the Constitution provides that 'every person may express and propagate his thoughts orally, in writing and through the press in compliance

with the laws of the State'. The article does not expressly refer to the online environment but applies to it. With regards to the effects of the EU ban on Russian media, Greece banned the transmission of "Russia Today" and "Sputnik" news networks. Journalism and data protection received a low risk (33%). There is evidence that online platforms have occasionally violated freedom of expression online <sup>[30]</sup>. Journalists' digital safety saw a dramatic deterioration during 2022 and was assigned a high risk (100%) as various Greek journalists said they had been targeted by the spyware Predator, which has been reportedly acquired by the Greek intelligence services <sup>[31]</sup>. This situation led to the publication of Law 5002/2022. However, as pointed by various press freedom organizations, the bill was drafted in haste and in an irregular manner; thus, it suffers from major defects and offers only largely cosmetic improvements <sup>[32]</sup>. With regards to GDPR, the derogations are implemented in a way that ensures the proper exercise of journalistic protection.

### 3.2. Market Plurality (70% - high risk)

The Market Plurality area considers the economic dimension of media pluralism, assessing the risks deriving from insufficient transparency in media ownership, the concentration of the market in terms of both production and distribution, the sustainability of media content production, and the influence of commercial interests and ownership on editorial content. The actors included in the assessment are media content providers, with indicators including Transparency of media ownership, Plurality of media providers, Media viability, Editorial independence from commercial and ownership influence, and digital intermediaries (with the indicator on Plurality in digital markets).



The area of **Market Plurality** is assigned the highest risk in this report (70%). Two indicators show a high risk ("Plurality in digital markets" and "Editorial independence from commercial and owners influence") whereas the other three present a medium risk ("Transparency of media ownership", "Plurality of media providers" and "Media viability").

The indicator on **Transparency of media ownership** scored medium risk – 54% presenting a decrease of 2pp from last year (56%). Greece's media ownership transparency remains a concern, as there is limited access to ownership details and opaque regulations regarding this issue. While recent laws and initiatives<sup>[34]</sup> may help improve transparency in the future, their full impact is yet to be seen. For the time being current limitations on public access to ownership registries may hinder progress. Greek law currently requires disclosure of ownership details only for some medial<sup>[35]</sup>. Recent initiatives have been introduced to improve transparency in the media sector, such as the Registers of Law 5005/2022 and the UBO Register, but the public still cannot access these platforms. Article 12 of the Ministerial Decision 01.11.2022 set the start of productive operation of access to the UBO Registry for obliged persons on 01.12.2022 and for the general public. However, the most recent Ministerial decision<sup>[36]</sup> suspended public access to the UBO from December 2022 until 31 January 2023, and this notification was still visible on the relevant website even two months later.

The indicator on **Plurality of media providers** scored medium risk – 62%. This is due to media legislation that aims to prevent high ownership concentration in the news media sector<sup>[37]</sup>. The National Council for

Radio and Television (ESR) oversees compliance with ownership limitations and dealt with 105 cases in 2020 and 2021. Law 4779/2021 introduced changes regarding the license procedure of media providers, and Article 40 regulates the transfer of radio companies and their obligations in a similar manner to Law 2328/1995. Radio stations included in the relevant Register of the ESR can continue to broadcast legally until the completion of the process of granting radio licenses with a deadline set for 30.6.2023. However, there is a serious lack of official data regarding news media concentration in Greece, and most of the legislation applies only to specific media. For example, the readership concentration of the Top 4 newspaper owners is not available as the agency responsible for distribution and official data, Argos, is owned by the media owner Evangelos Marinakis<sup>[38]</sup> and as a result various newspaper owners have asked that Argos excludes their readership from relevant data as they believe that it is biased.

Greece shows a high risk of 86% for the **Plurality in digital markets** indicator, mostly due to the lack of publicly available data on online advertising and audience shares of top online players. In Greece, data on the market and audience shares of the online news media sector are not publicly available and digital native media is not covered by Law 3592/2007. As for copyright and related rights, although the recent incorporation of EU Directives<sup>[33]</sup> provides related guidelines, it does not include specific provisions for digital news media concentration. Financial agreements between digital intermediaries and media providers are not publicly accessible, which indicates the ineffectiveness of the law.

The **Media viability** indicator in Greece scored medium risk - 57%. Based on the data provided by Media Services upon request, the revenues of radio, newspapers, and press agencies were stationary in the past year, but precise estimates of total revenues for the audiovisual and local media sectors are unavailable due to a lack of publicly available data. The number of employed journalists in Greece remained the same, with some public media organizations hiring more journalists with flexible working relationships, while the largest journalistic unions condemned the layoffs of journalists. The economic conditions for freelance journalists did not present any significant improvement compared with last year. Several journalists experienced salary cuts and layoffs in 2022, with unions condemning the dismissals. In terms of media innovation, podcasts are becoming more popular in Greece, with both digital-born and legacy news organizations investing in them<sup>[39]</sup>. However, it should be noted that there is also a lack of transparency on media management, structure, and business model strategies in Greece (Leandros and Papadopoulou, 2020)<sup>[40]</sup>.

The indicator for **Editorial independence from commercial and owner influence** scored high risk - 90%. In Greece, no laws or self-regulatory measures are in place to protect journalists from changes in ownership or editorial line or to ensure that appointments and dismissals of editors-in-chief are not influenced by commercial interests. News organizations also lack clear separation between editorial and commercial activities, and media owners are not required to disclose any actual or potential conflicts of interests that may affect editorial content. Recent data from the National Council of Radio and Television has shown that there have been cases of commercial influence on editorial content. While the 1998 Code of Journalists' Professional, Ethical and Social Responsibility provides some safeguards for editorial independence, journalists must also adhere to standards of refusing payment from private funds, avoiding conflicts of interest, and upholding journalistic independence. However, violating the code can lead to a disciplinary offense. Overall, the lack of legal and self-regulatory measures presents significant risks to editorial independence and protection of journalists from commercial influence, with the Code of Journalists' Professional, Ethical and Social Responsibility providing some, but potentially insufficient, safeguards.

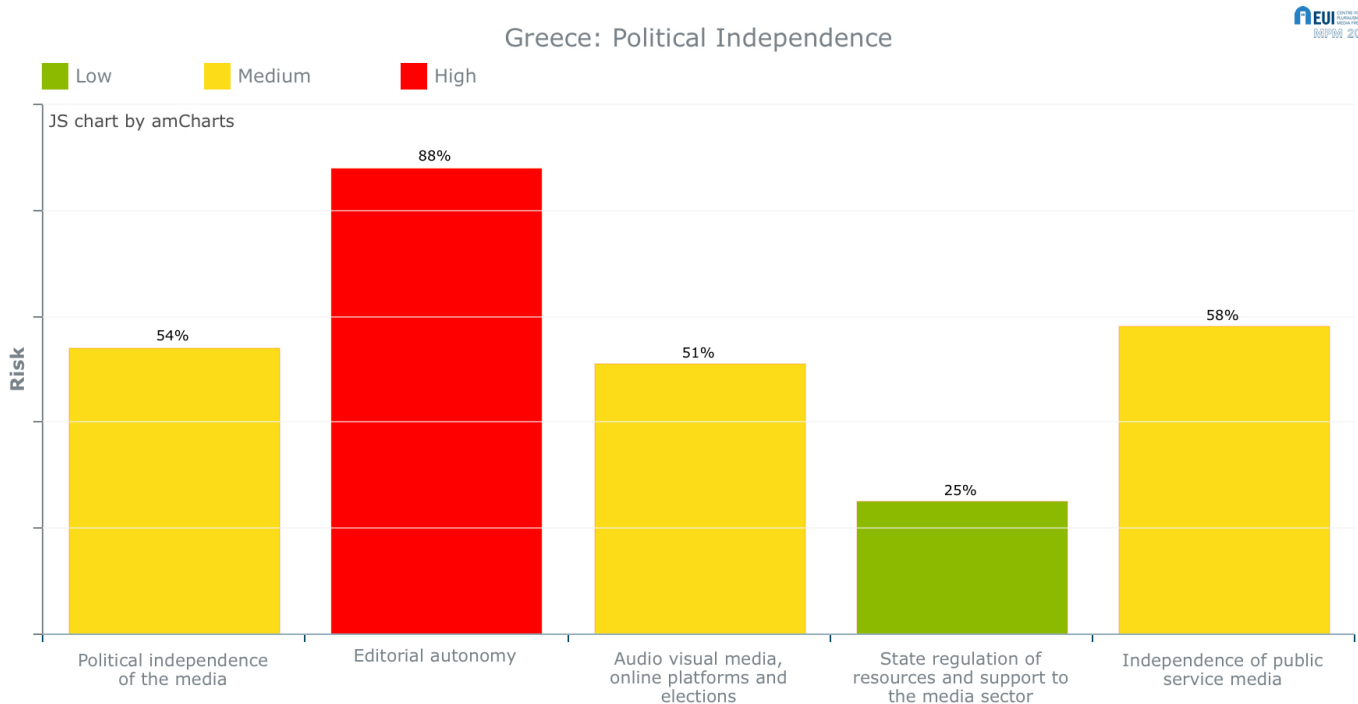


## Focus on the digital environment

The **Market Plurality** area in the digital environment, currently has a medium risk score of 62%, marking a 13-percentage point decrease from the previous year's score of 75%. The lack of publicly available data on online advertising and audience shares of top online players in Greece poses a high risk for the Plurality in digital markets indicator. This is due to the regulatory framework's lag in keeping up with the evolution of digital markets and their impact on the media environment. Digital native media are not included in the provisions of Law 3592/2007 to prevent high concentration of ownership. Instead, competition law (Law 3959/2011) is used to examine concentration in digital native media markets. Law 5005/2022 aims to establish two registries that will be available to the public to disclose media ownership, but their effectiveness cannot be evaluated yet as they are not yet accessible. Payment for online news is not culturally common. Alternative revenue sources are being developed by media organizations in Greece, including digital-only and alternative outlets relying on reader donations<sup>[41]</sup>. However, most news brands prioritize reach and page views (Angelou et al. 2020)<sup>[42]</sup> over building loyal audiences.

### 3.3. Political Independence (55% - medium risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



The general risk score for the **Political Independence** area in the MPM 2023 is 55%, which is in the medium-risk range, and is lower than last year (66%). With the exception of State regulation of resources and support to the media sector that received a low-risk score of 25% and Editorial autonomy that was once again assessed as high risk (88%), the rest of the indicators present a medium risk.

The indicator **Political independence of media** continues to show a medium risk (54%), indicating that in essence no significant progress has been achieved in this area. Greek media may not be directly owned by politicians, as this is prohibited by the law, however a strand of literature has recorded the existence of a relationship of interdependency between political elites and media owners (e.g. Papathanassopoulos et al., 2021; Papadopoulou, 2019). Another highly problematic situation concern Greece's one and only news agency, the Athens-Macedonian News Agency (ANAMPA), which functions under the "direct control of the State", a practice that has been condemned by the Council of State. In a recent development, the government decided to increase the number of members of the news agency's Board from 7 to 9 with the two additional members to be appointed by the government, thereby further strengthening its control over the news agency.

The indicator **Editorial autonomy** has a worrying high-risk score of 88%. The steady high risk is associated with the complete absence of safeguards that could guarantee autonomy and complete absence of political interferences when appointing and dismissing editors-in-chief in private and public media. This situation in combination with the ineffective implementation of the self-regulation has as a result the existence of systematic political influences on the editorial content in various news media.

A medium risk score of 51% is given to the indicator **Audiovisual media, online platforms and elections** which is higher than last year (35%). Despite the existence of specific rules<sup>[43]</sup> aiming at impartiality in news and informative programmes on PSM channels and service, there are problems as regards the monitoring of the implementation of these provisions by the ESR due to the lack of resources. With regards to PSM representation of political actors and political viewpoints in news and informative programmes, according to Greece's media authority (ESR) latest report<sup>[44]</sup>, during 2020 Greece's PSM represented different groups of political actors and/or political viewpoints in a biased way, clearly favoring some political actors and/or viewpoints over others. According to the same report, during the 2019 elections, Greece's tv stations (ERT included) dedicated 39,8% of their air time to the party of New Democracy, 31,53% to SYRIZA and 20,54% to the rest of the parties.

The indicator **State regulation of resources and support to the media sector** receives a low-risk score of 25%. Last year the risk was 67% and was attributed mainly to the lack of transparency and fair distribution of €20 million state subsidies to media outlets during the pandemic. This year, the Greek government tried to change this picture and took various initiatives aiming to support the country's media industry in a fair way. For instance, it ratified a new media law that aims to establish rules for the distribution of state advertising in the printed and electronic press<sup>[45]</sup>. Its effectiveness remains to be seen. Moreover, the government issued a new Joint Ministerial Decision<sup>[46]</sup> that regulated the distribution of direct subsidies. The list with the final beneficiaries was publicized with no complaints or negative reactions regarding the transparency of the procedures<sup>[47]</sup>. With regards to the indirect state subsidies, the Greek government implemented two support measures to contain the crisis of the TV sector. Nevertheless, there was once again a lot of criticism pointing out that the big TV stations received a preferential treatment and were funded with all sorts of "gifts"<sup>[48]</sup>. With regards to indirect subsidies to media outlets print media (newspapers and magazines) enjoy a lower value-added tax (VAT) rate than standard goods (Art. 21(1) of Law 2859/2000 as in force).

The last indicator on the **Independence of PSM** has a medium risk score of 58%, which is lower than last year (67%), mostly reflecting changes in the methodology. With regards to the safeguards concerning appointment procedures in ERT's management and board positions, despite the existence of relevant law provisions in practice, ERT's President, CEO and members of the Board of Directors are selected and appointed by decision of the relevant minister. It should be noted that ERT's president is the former manager of the Press Office of the leading party, New Democracy. Moreover, as relevant research has shown, ERT's editorial line is not totally independent from the government (e.g. Iosifidis, 2017). As regards funding, ERT enjoys financial autonomy and derives revenue through a mandatory license fee, advertising and other sources.

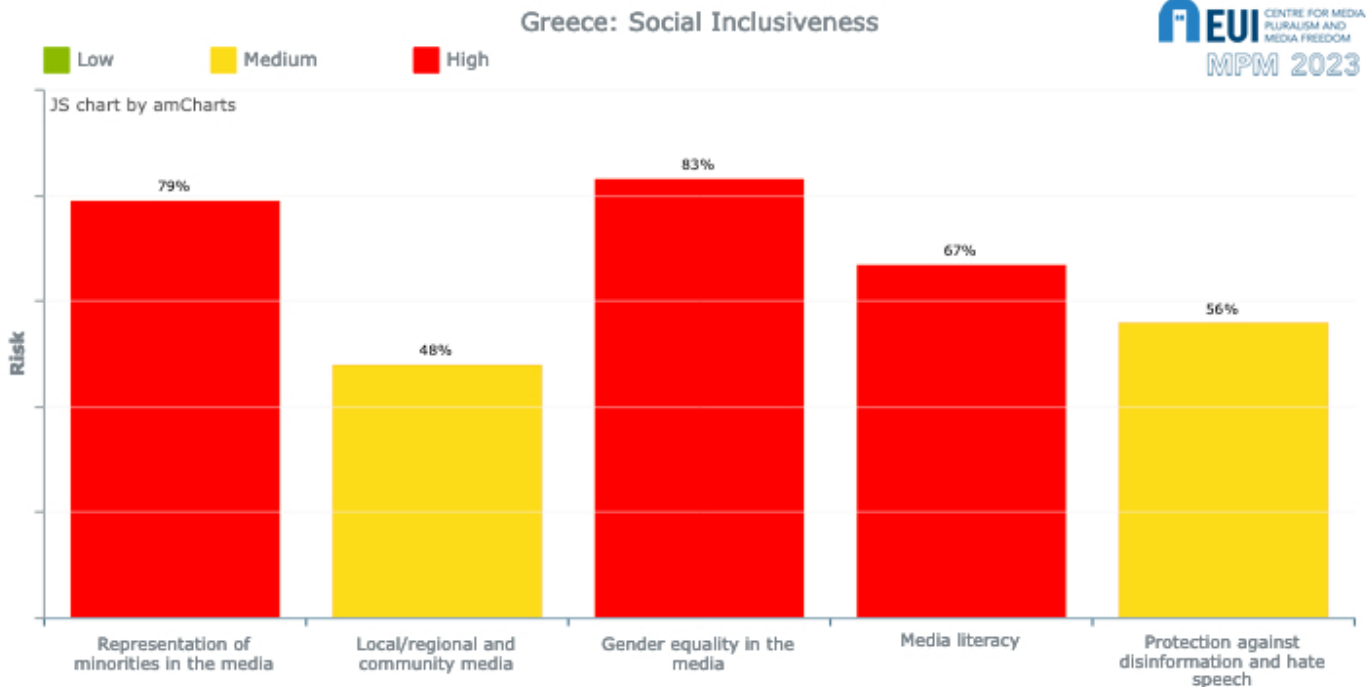
### Focus on the digital environment

**Political Independence** in the digital context shows a risk of 36%, significant higher than last year (21%). None of Greece's leading sites<sup>[49]</sup> is directly owned by Members of Parliament or political parties. However, it should be mentioned that it is estimated that there are more than 10,000 websites and blogs in Greece and only 1,137 are currently certified by the Secretariat of Information and Communications. These ownership data are not publicly available. Moreover, one should note that the digital media field seems not very different from the traditional one (Papathanassopoulos et al.,

2021). Rules on political advertising online shows a risk of 56%. While legislation foresees maximum campaign spending ceilings for candidates, provisions to ensure equal opportunities in political advertising in online media during electoral campaigns are not in place. Rules imposing transparency in campaign spending, including on advertising, do exist. Yet, domestic legislation does not contain provisions mandating national political parties to make available on their websites information specifically on their expenditure for online platforms.

### 3.4. Social Inclusiveness (67% - high 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 disinformation and hate speech.



The area of **Social Inclusiveness** presents the second highest risk in this report, specifically a risk of 67% which has remained almost the same as last year (66%). Three indicators show an increase since last year (Representation of minorities in the media, Gender equality in the media and Media Literacy), while one showed a significant decrease (Local/regional and community media). With the exception of Local/regional and community media, the rest of the indicators within this area present high-risk scores. This suggests that Social Inclusiveness is a highly problematic issue that deserves much more attention and specific initiatives aiming to improve the access to media by specific groups in society.

The **Representation of minorities in the media** indicator in Greece has a high-risk score of 79%, slightly higher from the previous year (76%). The law requires the Public Service Broadcaster ERT to broadcast topics protecting minorities<sup>[50]</sup>, but there are no specific provisions to ensure the Muslim minority of Thrace's access to airtime on ERT channels or services. The Muslim minority of Thrace does not have any news, informative, or current affairs programs in their languages on any of ERT's TV channels, and local PSM radio stations also do not offer national news in any of their languages. Furthermore, the historical minority populations not recognized by law, such as the Vlachs, Arvanites, or Slavic-speakers, also do not have national news in their languages on ERT's TV channels. This lack of provisions and access to media highlights the marginalization of these groups and poses a significant risk to their representation and integration into society. Moreover, the policy on accessibility of media content for people with disabilities is underdeveloped in Greece. Article 10 of Law 4779/2021 requires audiovisual media services providers to increase accessibility but audio description is not fully offered.

The indicator **Local/regional and community media** has a medium risk score of 48%, which has

decreased 21pp from last year (69%). A new funding program has been introduced to provide financial support to national, regional, and local media outlets in Greece, even though it remains unclear whether it has been implemented effectively<sup>[51]</sup>. In addition, local and regional newspapers need to be registered with the Electronic Regional and Local Media Subregistry to be eligible for reduced postal service rates, but they must meet specific criteria such as ownership-transparency, original content, and minimum copies sold. The registration process requires applicants to provide relevant information annually to renew their registration. The effectiveness of the funding program and the registration process cannot be evaluated until they have been in operation for some time<sup>[52]</sup>.

The indicator measuring **Gender equality in the media** has a high-risk score of 83%, higher than last year, indicating persistent under-representation of women in executive positions and management boards. In the private sector, only 8% of members of management boards in private TV companies are women, while women make up 20% of executives. The public sector has not adopted policies and measures aimed at promoting gender equality, with executive positions in ERT's management board currently held by men. In addition, male experts are more often invited by media to comment on political and relevant matters than female experts, reflecting a lack of formal rules on gender balance in reporting and news content. Women are portrayed in a highly stereotypical and sometimes derogatory manner in news, particularly in right-leaning media (Siapera & Papadopoulou, 2021).

The indicator for **Media literacy** in Greece has increased from a medium risk score of 46% last year, to a high risk of 67% in 2022. While media literacy is present in various governmental bodies and actors, it is not explicitly stated and is considered an underdeveloped or poorly implemented policy. However, the new Greek Law 4779/2021, which implements the reformed Audiovisual Media Services Directive AVMSD 2018/1808, is a significant step towards promoting media literacy. Although media literacy is not taught as a separate course in the education curriculum, it is widespread in non-formal education. Several initiatives aimed at increasing media literacy are conducted in different settings, indicating that there is an awareness of the importance of media literacy in Greece. Nonetheless, it is important to recognise that media literacy is not yet widely recognised as a key skill and is often overlooked. In order to address this, more efforts are needed to promote media literacy and integrate it into the educational system. With the implementation of the new law, there is hope that media literacy will become a more prominent aspect of education in Greece.

### Focus on the digital environment

With regards to the digital dimensions of the **Social Inclusiveness** area, the risk is calculated at 53% whereas last year it was estimated at 59%. Greece's Protection against disinformation and hate speech indicator has decreased to a medium risk score of 56%, from 69% last year. According to the Media Literacy Index 2022, the country is considered one of the most vulnerable to misinformation and fake news in Europe<sup>[53]</sup>. Although Greece has some initiatives to combat disinformation, fact-checking skills are still lacking, and the understanding of the negative effects of sharing fake news is limited among the public. The country's fight against disinformation is still at an early stage, and self-regulatory frameworks to counter hate speech online are not widely implemented. Greece is ranked fourth in the lowest category in Europe, together with Turkey and other Balkan countries, and lacks specific provisions to tackle disinformation. Only one out of three fact-checking initiatives is self-standing, but two out of three have collaborated with Meta's Facebook fact-checking program and are

funded through it. The European Digital Media Observatory recently selected MedDMO in Greece as one of six new hubs to create a technology platform to serve research that will provide other national hubs with valuable information. The core of MedDMO's mission is media literacy activities aimed at raising awareness and developing critical thinking to combat disinformation, and the disinformation monitor initiative will begin in early 2023. In terms of overall digital skills, Greece's population with basic or above basic skills is not higher than 52%. Compared to other member states of the European Union, Greece's overall digital skills are scored as medium risk.

## 4. Conclusions

The MPM2023 results for Greece show that media pluralism and press freedom in Greece are in a state of constant crisis as most of the old problems remain while new challenges such as the allegations about the digital surveillance of journalists with Predator spyware have been added to the mix leading to an extremely worrying situation. The biggest risks are once again tied to the situation of Market Plurality (70%) and Social Inclusiveness(67%). Fundamental Protection shows the same risk as last year (52%) while Political Independence is lower than last year (55%).

With regards to the risks associated with **Fundamental Protection** [52%- MEDIUM RISK] they could be addressed with the following measures:

- Promote the decriminalisation of defamation.
- Implement effective Anti-SLAPP frameworks that could prevent arbitrary and unlawful attempts to hamper critical reporting.
- Forbid the use of spyware against journalists.
- Enhance the independence and effectiveness of Greece's media authority by establishing clear rules for appointment procedures and providing the necessary resources.
- Organise awareness-raising activities on the issue of whistleblowers' protection

**Market Plurality** is the area with the highest risk in this assessment [70%- HIGH RISK]. For the challenges in this area, the following policy recommendations are suggested:

- Improve transparency of media ownership by requiring full disclosure of ownership details for all media and ensuring public access to ownership registries such as the Registers of Law 5005/2022 and the UBO Register.
- Increase availability of official data on news media concentration, including readership concentration of the newspaper owners.
- Implement measures, such as developing laws or self-regulatory measures to protect journalists from the possible problems arising due to changes in ownership or editorial line.
- Introduce legislation that aims to prevent high ownership concentration in the news media sector to promote plurality of media providers.
- Enhance media viability by supporting local and audiovisual media and providing more funding opportunities and financial support to freelance journalists and media organizations.

Several risks pertain to **Political Independence** [55%- MEDIUM RISK] and could be addressed with the following measures:



- Safeguard Athens-Macedonian News Agency's autonomy and impartiality by changing the appointment procedures for the board positions to ensure their political independence.
- Enhance PSM's independence by applying specific rules regarding appointments and dismissals of journalists and editors in chief.

In the **Social Inclusiveness area** [67%- HIGH RISK], the following measures could be implemented:

- Create provisions to ensure that minority groups have access to airtime on ERT channels and services, particularly the Muslim minority of Thrace.
- Implement policies and measures aimed at promoting gender equality, particularly in the public sector and rules on gender balance in reporting and news content.
- Evaluate the effectiveness of the new funding program designed to provide financial support to national, regional, and local media outlets in Greece.
- Further promote media literacy and integrate it into the education system in Greece. Recognize media literacy as a key skill and create policies that aim to teach media literacy as a separate subject in the education curriculum.

## 5. Notes

- [1] Hellenic Statistical Authority, 2021 <https://www.statistics.gr/2021-census-res-pop-results>
- [2] Data from 2021 census is not yet accessible
- [3] <https://www.hellenicparliament.gr/en/news/links/political-parties/>
- [4] European Commission: Economic forecast for Greece – 2022
- [5] Hellenic Statistical Authority: The Greek economy (30 December 2022) – 2022
- [6] Strong growth in 2022 in Greece <https://www.newmoney.gr/roh/palamos-oikonomias/oikonomia/ischiri-anaptixi-to-2022-stin-ellada-alma-tou-aep-kata-59/>
- [7] Hellenic Statistics Authority (2022) CONSUMER PRICE INDEX: December 2022, annual inflation 7.2% -  
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- [8] Euro area unemployment at 6.6% -  
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- [9] <https://insidestory.gr/article/greek-state-and-spyware-vendor-intellexa-they-are-acquainted-after-all> and <https://rsf.org/en/greek-and-european-authorities-must-take-urgent-action-after-many-more-journalists-said-have-been> and <https://cpj.org/europe/greece/>
- [10] <https://europeanjournalists.org/blog/2022/10/21/greece-slapp-award-winner-grigoris-dimitriadis-urged-to-drop-defamation-lawsuit/>
- [11] <https://cpj.org/2022/10/in-greece-reporters-killings-unsolved-critical-journalists-complain-of-growing-threats/>
- [12] <https://www.mapmf.org/alert/25315>.
- [13] <https://rsf.org/en/country/greece>
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[https://doi.org/10.1386/jgmc\\_00013\\_1](https://doi.org/10.1386/jgmc_00013_1)
- [16] <https://www.reuters.com/world/europe/greek-intelligence-service-admits-spying-journalist-sources-2022-08-03/> and <https://rsf.org/en/greek-and-european-authorities-must-take-urgent-action-after-many-more-journalists-said-have-been>
- [17] The latest ECtHR ruling where a violation of Art. 10 ECHR was found was *Balaskas v. Greece* (Appl. no. 73087/17, 5/11/2020).
- [18] This article was deemed problematic due to the vague definition of what constitutes fake news which could lead to various misuses against journalists who could be jailed or fined for their critical reporting
- [19] <https://www.mapmf.org/alert/25315>.

- [20] Specifically Documento and Press Project <https://thepressproject.gr/mitsotakis-apo-ti-mia-milouse-gia-elftheria-tou-typou-kai-aptin-alli-ekove-tis-erotiseis-tou-documento-kai-tou-the-press-project/>
- [21] it includes stricter protection measures for those who wish to provide information on corruption cases
- [22] For example, Real24 media headquarters were set on fire and a female sound engineer’s life was threatened
- [23] <https://ipi.media/greece-journalists-targeted-in-several-slapp-lawsuits/>
- [24] <https://europeanjournalists.org/blog/2022/10/21/greece-slapp-award-winner-grigoris-dimitriadis-urged-to-drop-defamation-lawsuit/>
- [25] <https://cpj.org/2022/10/in-greece-reporters-killings-unsolved-critical-journalists-complain-of-growing-threats/>
- [26] <https://www.mapmf.org/alert/25509>
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- [29] [https://www.eett.gr/opencms/export/sites/default/EETT/Electronic\\_Communications/Telecoms/OpenInternet/AnnualReport/NN\\_report\\_2021-2022\\_EETT.pdf](https://www.eett.gr/opencms/export/sites/default/EETT/Electronic_Communications/Telecoms/OpenInternet/AnnualReport/NN_report_2021-2022_EETT.pdf)
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- [31] <https://www.reuters.com/world/europe/greek-intelligence-service-admits-spying-journalist-sources-2022-08-03/> and <https://rsf.org/en/greek-and-european-authorities-must-take-urgent-action-after-many-more-journalists-said-have-been>
- [32] <https://rsf.org/en/greece-s-predatorgate-draft-law-surveillance-falling-short-european-standards-must-be-amended>
- [33] Directives 2019/789, (EU) 2019/790, and 2006/115/E
- [34] For instance, Law 4779/2021
- [35] For instance, Art. 14(9) of the Constitution states that “the ownership status, the financial condition and the financing means of the information media shall be disclosed, as specified by law”. It also mandates national legislation to designate “the measures and restrictions necessary for fully ensuring transparency and plurality in information”
- [36] Ministerial decision 174950 EΞ 2022/29.11.2022
- [37] For instance, Law 3592/2007, Law 4339/2015 and Law 4512/2018
- [38] Argos was also sanctioned by the Hellenic Competition Commission <https://www.epant.gr/enimerosi/deItia-typou/item/1288-deltio-typou-apofasi-epi-tou-elegxou-symmorfosis-tis-etairias-argos.html>
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- [41] Reporters United, The Manifold, and Solomon gain revenue through grants provided by foreign organizations. Vouliwatch is an independent, non-profit open government initiative that relies on donations from its readers and offers monitoring and control tools for legislation, simple presentation of parliamentary work, and information campaigns on transparency and openness issues
- [42] Angelou, I., Katsaras, V., Kourkouridis, D., and Veglis, A. (2020) Social Media Followership as a Predictor of News Website Traffic, *Journalism Practice*, 14:6, 730-748, DOI: 10.1080/17512786.2019.1635040
- [43] For instance Law 4173/2013

- [44] ESR 2020 activity report - 2020
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- [49] According to Reuter's Institute latest report (2022) the four leading media in Greece are 1) In.gr 2) Newsbomb.gr 3) Dikaiologitika.gr, 4)ProtoThema Online
- [50] Article 3(2) of Law 4173/2013
- [51] The new funding program has been introduced in the form of Joint Ministerial Decision 81/24.5.2022
- [52] The deadline for submitting applications was 20 June 2022, and the final beneficiaries of the program have been published on Diavgeia. Although it is unclear whether the funding program has commenced or not, its effectiveness cannot be evaluated until it has been in operation for some time
- [53] Greece is included in the 4th worst of the 5 ranking groups in Europe, together with Turkey and other Balkan countries

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

## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Lambrini</i>	<i>Papadopoulou</i>	<i>Assistant Professor</i>	<i>National and Kapodistrian University of Athens</i>	X
<i>Ioannis</i>	<i>Angelou</i>	<i>Postdoctoral researcher; Adjunct lecturer</i>	<i>National and Kapodistrian University of Athens; University of Western Macedonia</i>	

## ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
<i>Giannis</i>	<i>Kotsifos</i>	<i>Director</i>	<i>Journalists' Union of Macedonia and Thrace Daily Newspapers (ESIEMTH)</i>
<i>Maria</i>	<i>Skagou</i>	<i>Head of Legal &amp; External Affairs</i>	<i>Vodafone Greece</i>
<i>George</i>	<i>Pleios</i>	<i>Member/Head of the Department of Communication and Media Studies</i>	<i>National Council for Radio and Television &amp; University of Athens</i>
<i>Nikos</i>	<i>Leandros</i>	<i>Professor</i>	<i>Panteion University of Social and Political Sciences</i>
<i>Elpida</i>	<i>Vamvaka</i>	<i>Director</i>	<i>Homo Digitalis</i>

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