

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: Slovenia

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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 that is 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 that was carried out in 2022. 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 Slovenia the CMPF partnered with Marko Milosavljevic and Romana Biljak Gerjevic (University of Ljubljana), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

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

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of 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/>.

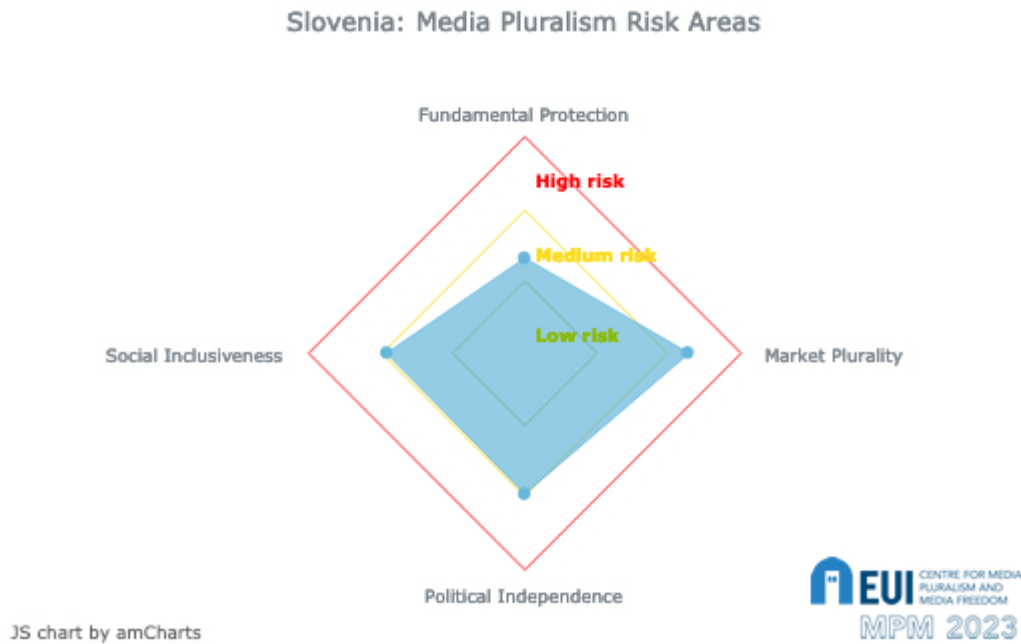
2. Introduction

- **Country overview:** The Republic of Slovenia covers an area of 20.271 km² and has a population of 2.110.547 (SURS 2022).
- **Languages:** The official language in the country is Slovenian. Italian and Hungarian are also official languages in areas where the Italian and Hungarian national minorities are densely populated.
- **Minorities:** There are three officially recognised minority groups: Hungarian (0.3%), Italian (0.1%) and Roma group (0.1%). Ethnic communities from the former Yugoslavia are also present, but they do not enjoy minority rights, even though their share of the population is larger than the share of officially recognised minority groups, i.e. Serbs (2%), Bosnians (1,6%) and Croats (1.8%).
- **Economic situation:** The national GDP increased by 5.4% in 2022 compared to 2021 (SURS 2022b). The economic growth was attributed to the first half of the year and the recovery after the COVID-19 epidemic (UMAR 2023). Inflation averaged 9.3%, and even though it was lower in the final quarter of the year than in the third, the European Commission noted only energy inflation decreased, while prices of industrial goods, food, and services were "increasing faster than before" (European Commission 2023).
- **Political situation:** Slovenia held parliamentary, local and presidential elections in 2022. The newly formed party Gibanje Svoboda, led by political novice Robert Golob, won the parliamentary election with 34.5% of the vote (DVK 2022). Golob, who had been the head of a major electricity company in Slovenia before his campaign, formed a coalition with the Social Democrats and the left-wing party Levica and replaced the head of the Slovenian Democratic Party (SDS) Janez Janša as Prime Minister in early June. SDS formed an opposition with the New Slovenia Christian Democrats (NSi). End of 2022, lawyer and ex-Information Commissioner Nataša Pirc Musar won over Anže Logar, former Minister of Foreign Affairs and member of the National Assembly from SDS, and became Slovenia's first female president (DVK 2022b).
- **Media market:** Reporters without borders (RSF), which ranked Slovenia 54th out of 180 countries in the 2022 World Press Freedom Index, described the Slovenian media market as small but diverse (RSF 2022). Eurostat's data shows 89.5% of households are covered by broadband, the average internet connection speed is 38.15 Mbps, and 50% of the population have basic or above basic overall digital skills (Eurostat 2022). Data also shows almost eight out of ten Slovenians (79.5%) now access online content via mobile phone (iPROM 2022).
- **Regulatory environment:** The Mass Media Act, which is one of the most important media laws in Slovenia, was adopted in 2001 and has not been subjected to major changes lately. The audiovisual law was reviewed and aligned with the 2018 Audiovisual Media Services Directive (AVMS) in December 2021, and the new law entered into force in January 2022. The new government amended the Act on RTV Slovenia, and after 62.8% of voters supported the legislative changes on a national referendum (DVK 2022c), the law came into power in late December. Some of the procedures of the new law will still be checked and proven in 2023, for instance, the consideration of the law at the Constitutional Court (Škerl Kramberger 2023). In November 2022, the Law on electronic communications (ZEKom-2), which transposes the EU Directive on the European Electronic Communications Code (2018/1972), came into power. After a slow process with many setbacks in December 2022, the new Personal Data Protection Act (ZVOP-2), which implements certain aspects of

the GDPR, was also adopted, and it entered into force in January 2023.

- **COVID-19:** End of May 2022, the last restrictions related to COVID-19 were lifted (STA 2022). The health crisis nevertheless affected the sale and revenues of Slovene media and journalism mostly through disturbances and obstacles in distribution, changing consumer habits and shortages of advertising revenues. Media and journalism did not receive any additional support related to the health crisis from the government, Ministry of Culture or other relevant institutions.

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



While the general findings of the Media Pluralism Monitor implementation in 2022 indicate a small improvement in some monitored areas, there are several indicators among all areas where the risk remains alarmingly high. Slovenia scored high risk in one monitored area (Market Plurality) and medium risk in the remaining three (Fundamental Protection, Political Independence, Social Inclusiveness). None of the monitored areas or indicators scored low risk to media pluralism, which has been the case since the 2020 monitor implementation.

The area of **Fundamental Protection** scored a medium risk of 44%, compared to 47% in 2021. The highest risk to media pluralism within this area is indicated in Independence and effectiveness of the media authority (57%) and the lowest risk is indicated in Protection of right to information (38%). This is also an indicator with one of the two lowest risks of all the monitored indicators. Changes to Article 135 of the Criminal Code, adoption of the Law on the Protection of Whistleblowers and the new Data Protection Act, the transposition of the EU Audiovisual Media Services Directive and the Directive on the European Electronic Communications Code were among the biggest changes within this area.

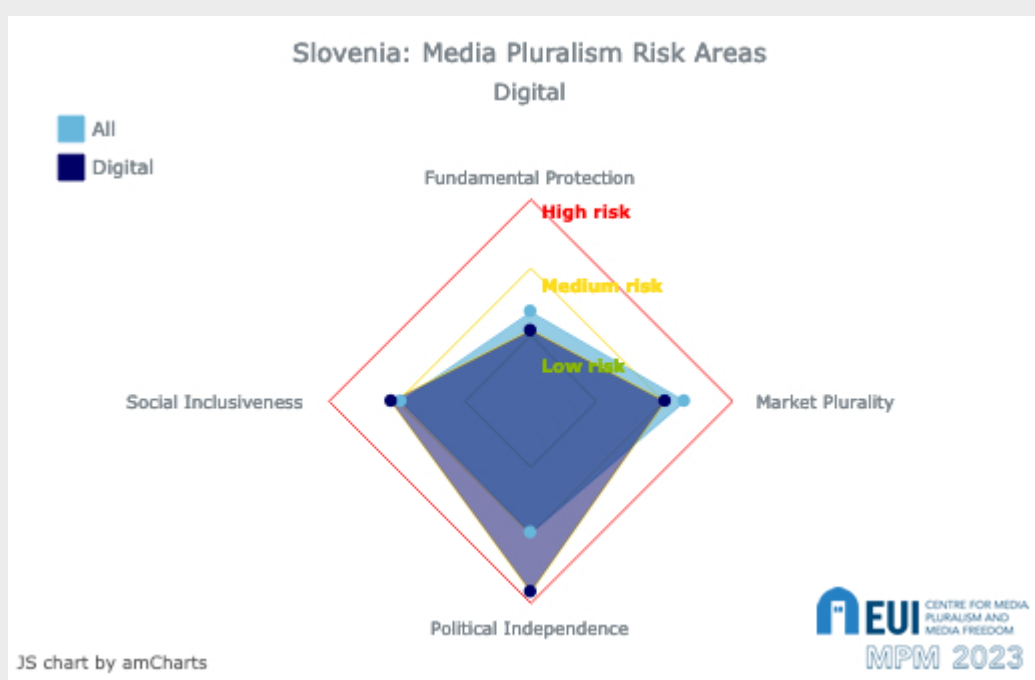
The area of **Market Plurality** scored a high risk of 76%, slightly above the level reached in 2021. The highest risk to media pluralism within this area is indicated in Editorial independence from commercial and owners influence (90%), which received the second-highest risk of all the monitored indicators. The lowest risk to media pluralism within this area is indicated in Media viability (60%), although it still presents a very high medium risk. The transposition of the EU copyright directives and dismissals of journalists at several media outlets were among the biggest changes within this area and there is a lack of improvements regarding transparency and concentration of media ownership.

The area of **Political Independence** improved to the medium risk zone (65%). Although the area scored a lower risk than Market Plurality, two indicators, which scored the highest and the third-highest risk, fall under its domain, namely Independence of public service media (96%) and Political independence of the media (89%). The lowest risk to media pluralism within this area is indicated in State regulation of resources and support to the media sector (38%), which is the second indicator to score the lowest risk of all monitored

indicators. Financing of the Slovenian Press Agency (STA), media coverage of the election campaigns, the escalation of pressures and controversies surrounding the public service broadcaster and the amendment to the law on RTV Slovenia were in the foreground in this area.

The area of **Social Inclusiveness** scored a medium risk of 64%, compared to 65% in 2021. The highest risk to media pluralism within this area is indicated in Protection against disinformation and hate speech (88%) and the lowest is indicated in Media literacy (50%). The government's increased promotion of digital inclusion and attention to hate speech online and its announcement of criteria changes in future allocation of funds to the media were among the biggest changes within this area, while the status of minorities and gender equality in media scored (almost) the same risk as a year before.

Focus on the digital environment



The digital variables within the area of **Fundamental Protection** scored a medium risk of 34%, which is lower than the overall risk of the area (44%). The issue of fundamental protection was primarily seen in several cases, which again exposed the need for a comprehensive anti-SLAPP legal framework to prevent the abuse of law and reduce the negative impact of SLAPP lawsuits. While the new Data Protection Act (ZVOP-2), which implements certain aspects of the GDPR, was adopted in December 2022, its effect will be felt only in 2023, as the law came into power in January 2023.

The digital variables scored a lower risk compared to the overall risk of the area also in **Market Plurality** with 66% (medium risk), compared to the overall high risk of the area of 76%. In terms of regulation, digital media is not defined by current Mass Media Act and thus there are no legal provisions protecting market plurality within the digital media landscape in Slovenia. There are no provisions protecting the dangers of concentration, as well as no provisions regarding takeover of digital media. Even more there are also no current measures ensuring the transparency of the digital media market, including subscription, advertising and other sources of revenues. One of the main outlets in the digital native environment is Siol.net, which is owned by state-controlled Telekom

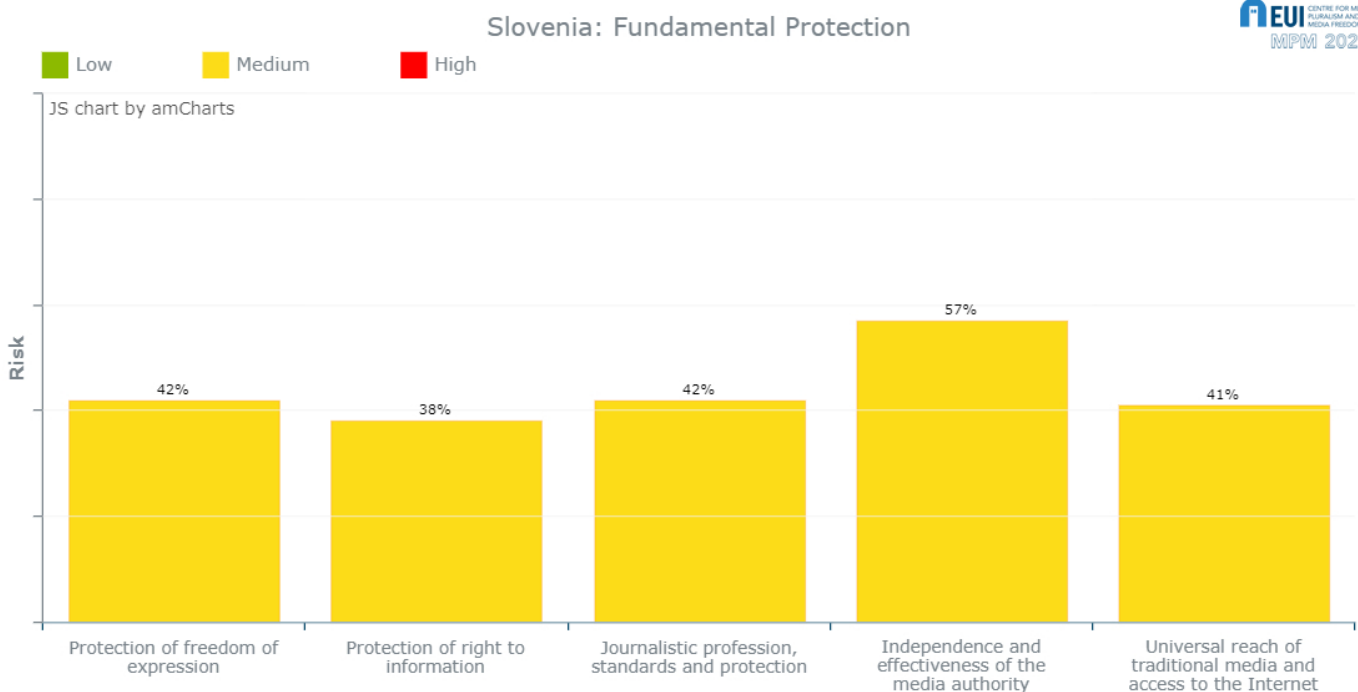
Slovenije, as described in detail in the following chapters.

In other monitored areas, the digital variables scored a higher risk than the overall risk of the area. The area of **Political Independence**, which scored an overall medium risk of 65%, registered a high risk of 94% in the digital environment. The lack of transparency of political advertising and techniques used in the digital environment was noted as an issue also by international observers of the parliamentary elections, which took place in 2022, and the lack of data on the misuse of personal data in the broader electoral context is considered to be a very high risk. The issue of several online media, which are affiliated with or influenced by open supporters or members of political parties and have been described in previous MPM assessments, is ongoing.

The area of **Social Inclusiveness** scored a medium risk of 64%, while the digital variables scored a high risk of 69%. Hate speech is a continuing issue in Slovenia over the past decade and more, however the previous years during the government of Janez Janša were particularly controversial in terms of hate speech, as the vulgar and aggressive as well as discriminate speech from Twitter, similar to the speech of Donald Trump in the USA, was implemented in Slovenian right wing politics in a much more aggressive and hateful manner than over the previous decades. In 2022, speech that was particularly aggressive towards minorities, women, journalists, political opponents and public intellectuals was produced and distributed not just by former Prime Minister Janez Janša, but also by former Minister of Interior Affairs Aleš Hojs, as well as by a number of other representatives of government and ruling coalition member's of the parliament until the government of Robert Golob took place.

3.1. Fundamental Protection (44% - 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 area of Fundamental Protection scored the lowest risk to media pluralism among all areas. However still a medium risk of 44%. The score is a three percentage points decrease from 2021 when the risk was 47%. The biggest risk in this area is indicated in the Independence and effectiveness of the media authority (57%), followed by Protection of freedom of expression and Journalistic profession, standards and protection (both 42%), Universal reach of traditional media and access to the internet (41%) and Protection of right to information (38%).

The indicator on **Protection of freedom of expression** scored a medium risk of 42%, which is nine percentage points less than in 2021. According to Reporters without Borders (RSF), press freedom is protected by a solid legal framework. However, defamation, which remains a criminal offence, allows politicians to launch muzzling legal actions against the media (RSF 2022). Criminal offences against the honour and reputation of an individual are punishable by a fine or imprisonment (KZ-1) and include insult, slander, defamation, calumny and malicious false accusation of crime. Pursuant to Article 27 of KZ-1, these criminal offences qualify as such if committed intentionally, and if they are committed via media or similar public platforms, they are punished with a higher fine or imprisonment. The government led by Robert Golob eliminated the controversial amendment of Article 135 of the Criminal Code (KZ-1), which stipulated that threats against the highest representatives of the state, a member of parliament, a member of the Council of State, a member of the government, a judge of the Constitutional or Supreme Court or their relatives will no longer be prosecuted at the request of the injured party, but ex officio. The amendment was adopted by Janša's government in 2021 (M. R. 2023). Visible judicial decisions regarding defamation in the past year include a case against a local mayor (V.H. 2022) and several cases against ex-Prime Minister Janez Janša (M. R. & N. P. 2022; STA 2022b; K. K. 2022).

The indicator on **Protection of right to information** scored a medium risk of 38%, compared to 50% it scored in 2021. After receiving a warning from the European Commission for “failing to fulfil their obligations” to pass a new whistleblower protection law (Worth 2022), the Slovenian government adopted the Law on the Protection of Whistleblowers (EVA 2021-2030-0052) in October 2022 and the law was passed by the National Assembly in favour in January 2023. As stated in the previous reports, the right to information is explicitly recognised in the Constitution, Article 39, para 2. The Slovenian Constitution provides a higher level of protection of rights in this area compared to the European Convention on Human Rights (ECHR) and the case law of the European Court of Human Rights (ECtHR) concerning Article 10 of the ECHR. The sectoral law, i.e. the Access to Public Information Act (ZDIJZ, last amended in 2015), put in place appeal mechanisms and defined restrictions on the right to information. However, they are often misused, especially the confidentiality provision.

With 42%, the indicator on **Journalistic profession, standards and protection** scored the same level of medium risk as a year ago. The preliminary results of a survey conducted by the Slovenian Union of Journalists and the Center for Social Communication at the Faculty of Social Sciences showed more than a quarter of the surveyed workers at the public RTV Slovenia (RTVS) feel burnout several times a week and approximately three-quarters of the respondents perceive excessive workload (Jakopič 2023). Throughout the year, 20 attacks on journalists were reported on the online platform run by the Slovene Association of Journalists, including verbal and physical attacks (Društvo novinarjev Slovenije 2022). Mapping Media Freedom reported at least ten threats and physical attacks against journalists in the country (European Centre for Press and Media Freedom 2022). An anti-SLAPP legal framework is still needed. The Slovene Association of Journalists called for legislation again in July 2022 and described strategic lawsuits against public participation (SLAPPs) as a serious threat to journalism and public interest (Društvo novinarjev Slovenije 2022b). In November 2022, the trial for the first 15 lawsuits, initiated by tax adviser Rok Snežič against journalists from the portal Necenzurirano, was supposed to begin. However, it began only in January 2023 (STA 2022c; STA 2023). Online portal Siol reported that the specialised state prosecutor's office demanded the names and personal registration numbers of three journalists who reported on threatening letters to politicians (Siol 2022).

The indicator on **Independence and effectiveness of the media authority** scored a medium risk of 57%, which is an eight percentage points increase from the year before. The Act Amending the Audiovisual Media Services Act (ZAVMS-B) came into power in January and transposed the EU Audiovisual Media Services Directive. In September, the Law on electronic communications (ZEKom-2), which transposed the EU Directive on the European Electronic Communications Code, was adopted and came into power in November (Služba Vlade Republike Slovenije za digitalno preobrazbo 2022). The European Commission filed a lawsuit against Slovenia at the Court of Justice of the EU before that due to the untimely transposition of this directive (Al. Ma. 2022). The scope of responsibilities of the Agency for Communication Networks and Services (AKOS), which is the designated media authority, remains broad and varied, making it possible for media issues to be marginalised. During its assessment of the parliamentary elections, the Organization for Security and Co-operation (OSCE) wrote the oversight of media conduct during the campaign is split between two institutions (namely AKOS and the Culture and Media Inspectorate of the Ministry of Culture), whose “tasks are generic, resources inadequate and sanctioning power limited” (OSCE 2022). In November 2022, AKOS recognised incitement of violence and hatred against a group of persons or a member of such a group on the basis of belief, political or other opinions, which is a violation of the Law on Audiovisual Media Services, in the inspection of broadcaster Nova24TV (STA 2022d).

The indicator on **Universal reach of traditional media and access to the internet** scored the same medium risk as a year before with 41%. Universal coverage of the public service media (PSM) is safeguarded by the law. However, there is a lack of data on the exact share of the population covered. Data from the first quarter of 2022 shows the top four internet content providers are Telemach Slovenije (31.39%), Telekom (27.58%), T2 (21.30%) and A1 Slovenija (15.10%) (AKOS 2022).

Focus on the digital environment

The digital variables within this area scored a medium risk of 34%. Slovenia did not take immediate action towards the Russian media outlets at the beginning of the Russian invasion in Ukraine in February 2022, however it followed the Council of the EU decision and regulation effectively banning RT, its subsidiaries and Sputnik based on Article 215 of the Treaty on the Functioning of the European Union (TFEU), which came into force on 2 March 2022. AKOS informed on the EU regulation and decision on its website (AKOS 2022b).

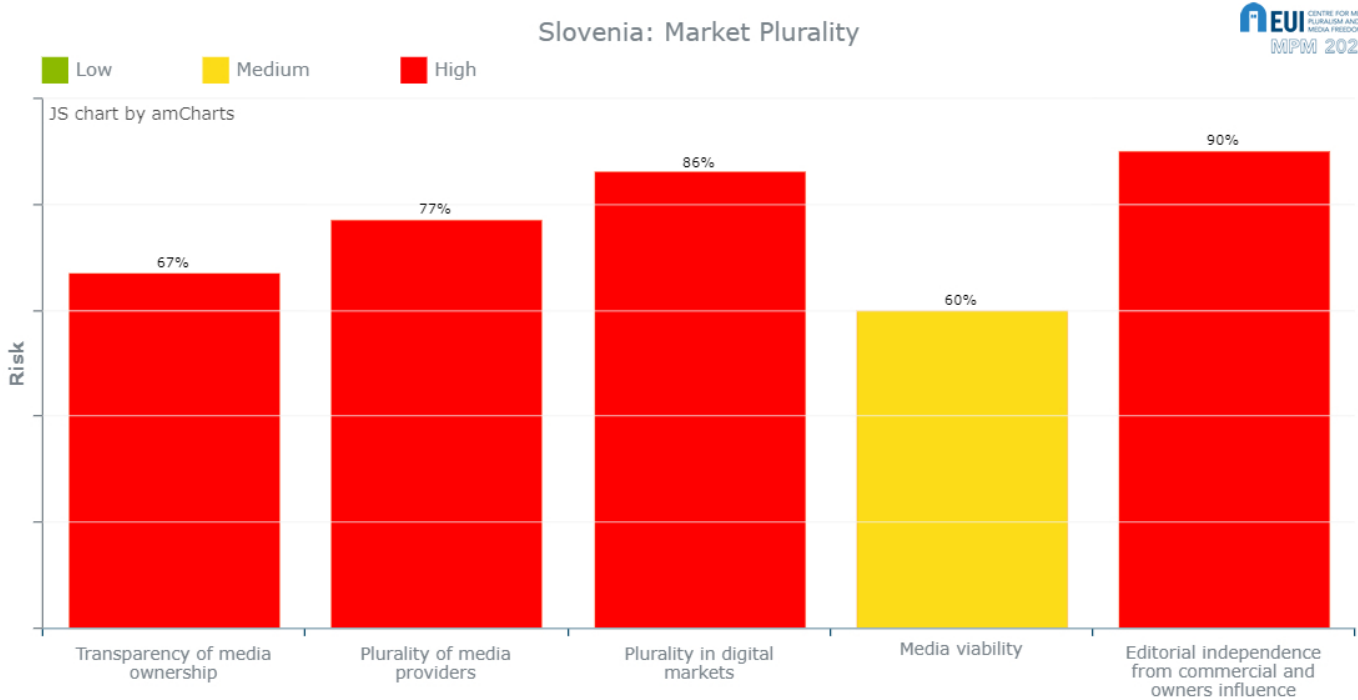
Based on the Facebook and Instagram Transparency Reports, the company Meta restricted access to "162 items that represented Russian state-controlled media sources due to European Union-imposed sanctions" in the first half of the year in Slovenia and implemented additional 14 global restrictions. That is 127 restricted pages on Facebook and 49 restricted accounts on Instagram (Meta 2022). The last available data for Twitter is from the second half of 2021 and it shows the company had not received any legal removal requests from Slovenia during that time (Twitter 2022).

The Personal Data Protection Act (ZVOP-1) was in force throughout 2022. The new Data Protection Act (ZVOP-2), which implements certain aspects of the GDPR, was adopted on December 15th 2022. It was published on December 27th 2022 and it entered into force on January 26th 2023.

As stated in previous MPM assessments, attacks against journalists and media outlets in the online environment are still common. They appear mostly in the form of hate speech, harassment and bullying, also vulgar and sexist comments, which are more often aimed at women journalists than male journalists. Social media channels, where perpetrators can remain anonymous, are common environments for attacks against journalists, however they are exercised also by visible politicians and public figures.

3.2. Market Plurality (76% - 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 Market Plurality scored the highest risk to media pluralism among all areas with 76%. The indicator on Editorial independence from commercial and owners influence scored the highest risk with 90%, followed by Plurality in digital markets (86%), Plurality of media providers (77%), Transparency of media ownership (67%) and Media viability (60%).

The indicator on **Transparency of media ownership** scored a medium risk of 67%, almost the same level scored in 2021. The stipulations of the Mass Media Act remain the same. Media are obliged to disclose information of 5% or higher individual ownership or management stakes in the publishing or broadcasting company to the Ministry of Culture and the information is published in the Media Register, which is public. The law does not contain any provisions requiring media to disclose ownership details to the public by themselves. The current legislation makes it possible for different publishers to connect in complex ownership networks and hide their concentration on the market.

The indicator on **Plurality of media providers** scored the same high risk as in 2021 with 77%. As stated in the previous assessments of the Media Pluralism Monitor, the media market is small and horizontal concentration is generally high. It is most present in the radio sector, followed by the magazine and audiovisual services sector. There have been no efforts to improve and shorten procedures of relevant agencies related to media concentration and anti-competitive practices. To prevent cross-media concentration, the Mass Media Act establishes a threshold of an ownership stake of more than 20%, when a publisher of a daily informative printed medium needs the approval of the Ministry of Culture to also publish

or co-found a broadcaster of a radio or television programme service. Approval is needed also vice-versa. The law also states performing radio and television activities, advertising, radio and television activities or telecommunications and radio and television activities is incompatible, however in some cases an appropriate licence can be obtained. In June 2022, a district court ruled in favour of the Slovenian Bank Assets Management Company (DUTB), which filed a lawsuit against the company Dolenjski list regarding the ownership stakes in Salomon company, arguing also the media legislation was violated. Both are connected to the media conglomerate of Martin Odlazek, however the judgement was not final in 2022 (Kos 2022). Data for December 2022 shows the audience share of the top 4 online news media in Slovenia is around 44% (MOSS 2022). Data for the first half of 2022, gathered by agency Mediana, shows the top 4 radio owners share 63% of the audience (Mediana 2022).

The indicator on **Media viability** scored a medium risk of 60%, compared to 43% it scored in 2021. We can attribute the change to the economic context in 2022; considering inflation forecasts of media revenues scored a high risk in the audiovisual, radio and newspaper sector. Assessing figures for advertising only is very complex for Slovenian media, as it is difficult to separate sources of income in a specific media company, it is also difficult to separate income of specific sectors within a company, which is offering services in different media branches, e.g. broadcasting, newspapers and magazines. There were several reports about the deep crisis of print media; circulation and revenues of daily newspapers have been falling for several years in a row, the country is also facing problems in distribution infrastructure and services (Kos 2023, Krušič 2023). Media reported local media are specifically "burdened by a lack of financial resources" (Zupan 2022). End of the year lay-offs have been announced at daily newspaper Večer (Kos 2023, Krušič 2023), which was opposed by all the main journalistic organisations (STA 2022e, Upravni odbor Društva novinarjev Slovenije & Izvršni odbor aktiva novinarjev Večera 2022), and before that several journalists lost their jobs at television network POP TV as well (K. A. 2022).

The indicator on **Editorial independence from commercial and owners influence** scored the highest risk within this area with 90%. The Mass Media Act and The Code of Journalism Ethics include some measures to prevent commercial influence on journalists and content (for instance, paid publications must be clearly distinguished from journalistic texts and journalists must refuse rewards or favours), however these are not always effective (Mass Media Act 2016). Advertorials often and mostly appear in print and online media. Multiple journalists from daily newspaper Dnevnik stated in September 2022 it is generally known, how they should report about certain issues (Lah 2022). There are no specific mechanisms safeguarding social security of journalists in case of changes of ownership or editorial line.

Focus on the digital environment

The digital variables within this area scored a medium risk of 66%. As mentioned, digital media is not defined by the current Mass Media Act in terms of regulation and thus there are no legal provisions protecting market plurality within the digital media landscape in Slovenia. One of the main outlets in the digital native environment is Siol.net, which is owned by state-controlled Telekom Slovenije. This means that one of the main Slovenian digital news outlets is almost directly controlled by each government, making it a potential prolonged arm of government media communications and promotion. Siol also doesn't have any measures to ensure its editorial independence from its owner – both Telekom Slovenije and the government of Slovenia. This makes Siol even more vulnerable to political interferences, which makes the digital landscape even more vulnerable to improper interventions.

The indicator on **Plurality in digital markets** scored a high risk to media pluralism of 86%. Slovenia transposed the EU Directive 2019/790 and EU Directive 2019/789 in an urgent legislative procedure in September 2022 with *Zakon o spremembah in dopolnitvah Zakona o avtorskih in sorodnih pravicah (ZASP-I)* and *Zakon o spremembah in dopolnitvah Zakona o kolektivnem upravljanju avtorske in sorodnih pravic (ZKUASP-A)*. Both came into power on October 26th 2022. The Ministry of Commerce justified the urgent procedure as necessary, because of the sanctions threatened by the EU Commission (Communia 2022).

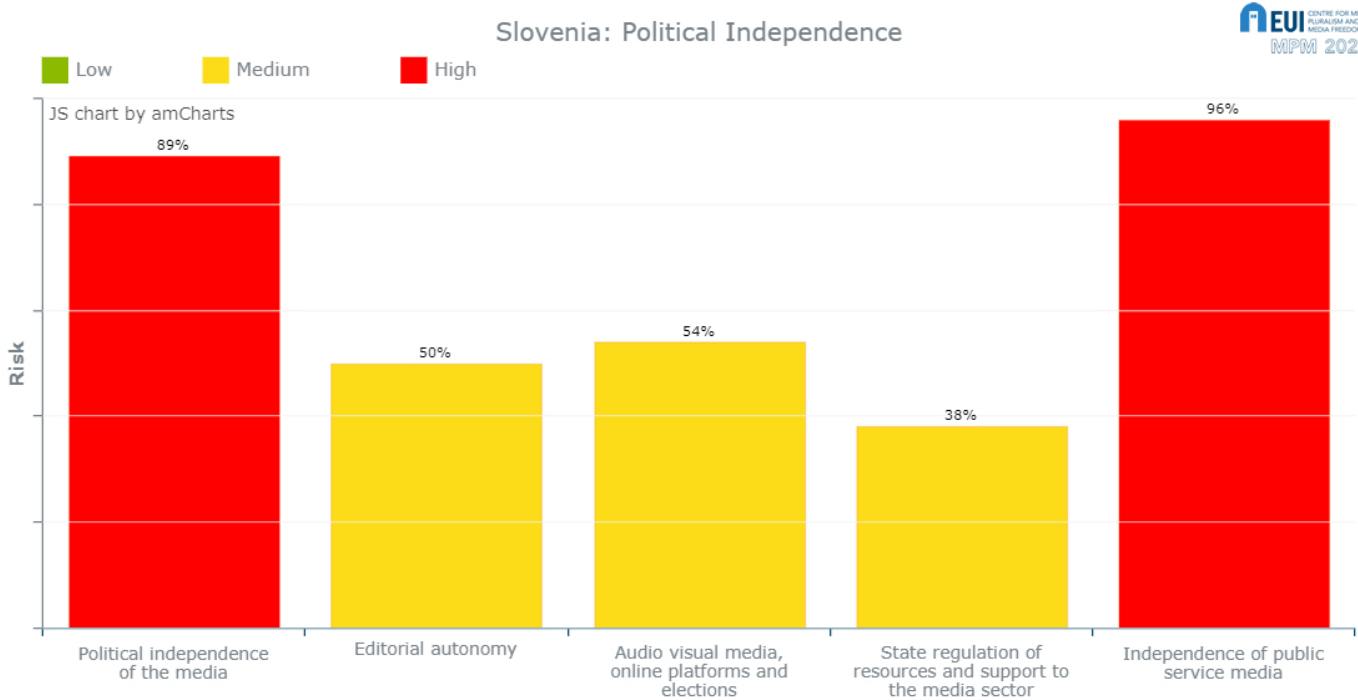
In December 2022, Google launched Google News Showcase in Slovenia, signing agreements with six national, regional and local news organizations: Delo, Časnik Finance, Siol.net, Slovenske novice, Slovenska tiskovna agencija and Styria Media si (Mrndze 2022). There is no public knowledge on any other negotiations between commercial news media and the digital platforms who disseminate their content online (such as search engines, social media, news aggregators).

Measuring online audience concentration and revenues in the market of online advertising, while including content providers and digital intermediaries, is complex due to a lack of data. There is also a lack of comprehensive data on revenues of digital native media considering all revenues (such as advertising, subscriptions, crowdfunding, donations, state funding), which presents a high risk. There are still no indications that concentration in the digital environment is being monitored at all and the legislation regarding concentration in the media sector remains outdated for the digital environment.

In February 2022, a new online platform called Nov dan was established. Its goal was to "allow readers to monthly directly support independent media, working in the fields of investigative journalism, active citizenship and a critical view of today's society" (Oštro 2022). It included smaller centers and online portals Oštro, Državljan D, In media res, Mešanec and Agrument.

3.3. Political Independence (65% - medium risk)

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



The area Political Independence scored the second-highest risk among all areas, with 65% (medium risk). The highest risk to media pluralism was indicated in the indicator Independence of public service media (96%), followed by Political independence of the media (89%), Audio visual media, online platforms and elections (54%), Editorial autonomy (50%) and State regulation of resources and support to the media sector (38%).

The indicator **Political independence of the media** scored a high risk of 89%. Legal safeguards against political interference in editorial policies and regulations of the conflicts of interests between owners of media and the ruling parties, partisan groups or politicians are still needed. The general Integrity and Prevention of Corruption Act (Integrity and Prevention of Corruption Act, 2010) applies, however it does not mention media in specific terms. The media associated Zavod Iskreni, publisher of web portal and weekly Domovina until June 2022, with the NSi party of the current opposition (Cirman, Modic & Vuković 2022). The national TV station Nova24TV was started by SDS party members and their members have been affiliated with other – mostly online – media as well (Škapin 2022, Bulatović 2022). The media reported Radio City was sold to Hungarian companies associated with the circles of the Hungarian Prime Minister Viktor Orban in 2022 (Peršak 2022). The former editor of Demokracija Jože Biščak was questioned by the commission, investigating suspicions of illegal financing of the election campaign before the parliamentary elections (STA 2022f). In February 2022, the STA and the Government Communication Office (UKOM) signed a contract which, instead of a guaranteed annual amount of state funds, envisaged a monthly allowances based on a submitted list of outputs, i.e. according to the number of published news and photos.

The contract was based on the then government's Decree on the implementation of public service by the Slovenian Press Agency from 2021, which defined payment according to the volume of production (Škerl Kramberger 2022). In December 2022, the government under Robert Golob abolished the decree, stating the financing in 2023 will again be regulated with an annual contract between STA and UKOM, as defined in the Law on STA (Ministrstvo za kulturo 2022, D. P. & STA 2022).

The indicator on **Editorial autonomy** scored medium risk (50%). Several examples in the past show there is occasional interference concerning appointments and dismissals of editors-in-chief. In March 2022, Igor Pirkovič was appointed temporary editor of the editorial office for new media at the online outlet MMC of RTV Slovenia, which was strongly opposed by the journalists of MMC, RTVS and the Slovene Association of Journalists (T. K. B. & M. Z. 2022). While the media laws refer to autonomy in provisions related to appointing and dismissing editors-in-chief, these provisions often have no real effect. The role of freelancers and permanent contributors is not defined in terms of their participation in decision-making in the newsrooms. The general Code of Journalism Ethics (2002) applies to all journalists and media and the Journalist Court of Honour handles complaints from the public. Based on public information the court has decided on at least 16 cases in 2022 (Novinarsko častno razsodišče 2022).

The indicator on **Audio visual media, online platforms and elections** scored a medium risk of 54%. The public service broadcaster must guarantee equal time for candidates and political parties represented in the National Assembly and European Parliament and one-third of the total election programmes time for candidates and political parties that are not represented in the National Assembly or European Parliament. Before the April parliamentary election the RTV included the party Naša dežela with its leader Aleksandra Pivec in the pre-election confrontations of parliamentary parties, namely on the basis of the legal succession of party DeSUS, even though its members were not in the parliament at that time (A. S. 2022). Before the election the national television also held a confrontation of presidents and representatives of parliamentary parties, which resonated loudly in the public, as six out of twelve political guests left the confrontation prematurely due to disagreement with the way the discussion was conducted. Several journalistic organisations, politicians and the collective of RTV journalists called for the resignation of the responsible editor of TV Slovenia's informative programme Jadranka Rebernik and the then acting director of TV Slovenia Andrej Grah Whatmough (Eržen & Vrabc 2022, La. Da., T. K. B., A. S. & M. R. 2022). There is no specific regulation or self-regulation governing the access to airtime on commercial channels for political actors during election campaigns, except for the general stipulation that published advertisements must clearly indicate the entity funding it. The legislation does not regulate expenses related to third party campaigning and campaigning on social or other online networks, which was noted also by OSCE and is further explained in the digital snippet below. OSCE nevertheless wrote "campaign coverage by the public television and some private media was criticised as politically biased, but the overall pluralism of the media let voters have informed opinions about the contestants' political platforms" (OSCE 2022).

The indicator on **State regulation of resources and support to the media sector** improved to the medium risk area, scoring 38%. The risk drop can be attributed to the already mentioned changes of the Law on electronic communications, which regulate in more detail the general principles of radio frequency spectrum management and the strategic planning and (cross-border) coordination of radio frequency spectrum policy. The approximate value of the annual call for co-financing media content for the year 2022 was a maximum of 3.1 million euros. In area B, the Ministry of Culture allocated the highest amounts to the projects of Radio Ognjišče, Radio Robin, Tele-TV, Television Novo mesto, TV Idee and VTV Velenje, while in area A, to Beletrina, Planet TV, Mangart group and TSmedia projects (La. Da. 2022, Ministrstvo za kulturo 2021). In November 2022, the Ministry of Culture published the call for 2023 and announced it will impose renewed

criteria for evaluating submitted projects (STA 2022g). The main issues are still observed within the allocation of the regular public funds for media projects in the public interest, which appears highly prone to political interference, and the distribution of the so-called state advertising. This advertising paid by national, regional or local governments or state-owned companies continues to be distributed without a clear set of rules and in a non-transparent way. There is a general lack of data on media, which received advertising from state companies.

The indicator on **Independence of public service media** scored the highest risk within this area with 96%. The Programme Board of RTV Slovenia appointed the director-general Andrej Grah Whatmough for this position for the next four years in March (La. Da. 2022b) and a few months later he appointed the former director of UKOM Uroš Urbanija as director of the Television (Jereb 2022). End of May journalists and media workers at RTV Slovenia went on strike, demanding journalistic autonomy, social dialogue and that the government fulfils its financing commitments (Sindikat novinarjev Slovenije 2022). In the months before they were alerting to the escalation of pressures both inside and outside the public media house, problematic staffing, deteriorating working conditions, insults and the increasing involvement of politics (M. Z. & Al. Ma. 2022). In July 2022, members of the Parliament adopted the government's amendment to the law on RTV Slovenia (ZRTVS-1, 2005), which proposed that the management and control of the public service would be transferred from the Programme and Supervisory Board to the unified council of RTVS (La. Da. & Al. Ma. 2022). Members of the SDS collected the 40.000 voter support signatures needed to call a national referendum (M. V., M. R. & M. O. 2022), which was organised in November. The voters supported the law with 62,80% in favor (DVK 2022c) and a new law on PSM came into power on December 28th 2022 (A. K. K. 2022). Until then the previous law was in power and in 2023 the transparency and procedures of the new law will still be checked and proven, namely by the Constitutional Court (Škerl Kramberger 2023). In September, Grah Whatmough called on the Prime Minister to increase the RTV contribution or to make a generous budget contribution due to the energy crisis and the resulting difficult financial situation (R. K. 2022).

Focus on the digital environment

The digital variables within this area scored a high risk of 94%. Political parties are generally not transparent on spending and techniques used in social media. Several parties used TikTok before the spring parliamentary elections and some of them used outside agencies to manage their account, the media reported (M. Smajila 2022, M. Smajila 2022b). The media outlet Nova24TV leased the names of the party Gibanje Svoboda and party coalition KUL on Google before the election and the media reported they ensured users will come across an ad, which will take them to their website (M. Smajila 2022c).

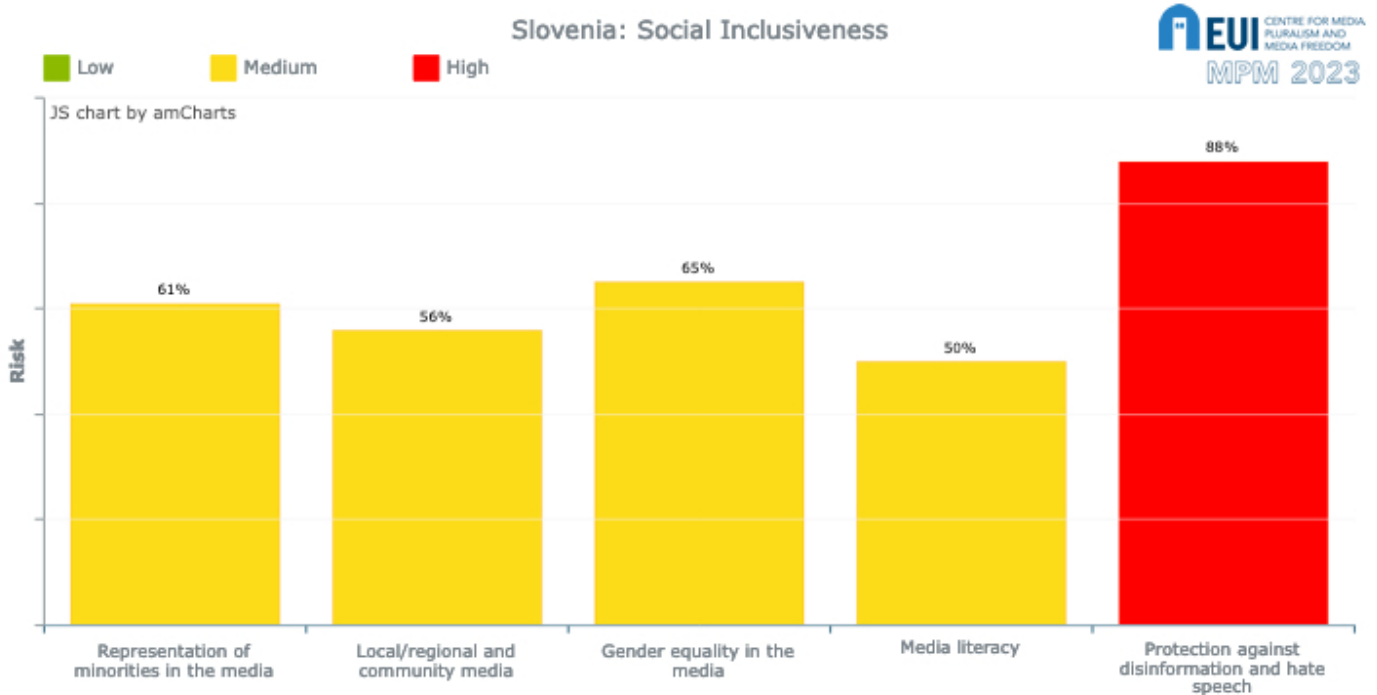
"According to public information, the parties participating in the campaign spent significant amounts on advertising on Meta and Google, and the private TV station Nova24TV, which is legally owned by SDS, also leased significant amounts of advertising on Meta and Google", OSCE wrote in their parliamentary elections' assessment report. The organisation stated some of their interlocutors expressed "concern about unmarked campaign ads that lack information about funding sources, especially online, mentioning possible financial support from some parties from Hungary" (OSCE 2022). The amount of financing specific parties dedicated to social media and Google Ads can be found on the ad transparency pages of Meta and Google, however political ads are also posted by non-official or fake pages, often practising hidden advertising.

Complaints about misuse of personal data are resolved, however there is no data on misuse, no one

officially complained about or is perhaps not aware of. Especially considering all actors active in the electoral context, such as European and national political foundations, platforms, data analytics companies, this lack of data is considered to be a very high risk.

3.4. Social Inclusiveness (64% - 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 disinformation and hate speech.



Social Inclusiveness is the area with the second-lowest risk for media pluralism in Slovenia with 64%, which is a 1 percentage point decrease from 2021. The indicator on Protection against disinformation and hate speech scored the highest risk to media pluralism with 88%, followed by Gender equality in the media (65%), Representation of minorities in the media (61%), Local/regional and community media (56%) and Media literacy (50%).

The indicator on **Representation of minorities in the media** scored the same medium risk as a year before with 61%. The level of participation of the minorities, recognised by law, is maintained at the PSM. The Italian and the Hungarian communities both have radio and television programs dedicated to them, so does the Roma community, although in a smaller scope. The results from the yearly tender for co-financing media programs by the Ministry of Culture indicate a project on Radio Romic by the Association of Roma of Slovenia received almost 30 thousand euros for 2022 (Ministrstvo za kulturo 2021). Minorities, which are not recognised by law, have no legal rights to airtime. A show dedicated to the Serbian minority *Kontrola leta* for instance received around a thousand euros on the mentioned annual call (Ministrstvo za kulturo 2021). The revised Audiovisual Media Services Act was adopted in December 2021 and became valid in January 2022, articles 14a and 14b, which encourage providers to "gradually and continuously" improve the accessibility of their services for the disabled and persons with visual or hearing impairment, transpose the article 7 of the AVMSD. While the PSM is increasing the range of accessible content yearly, the private providers are lagging behind.

The indicator on **Local/regional and community media** scored the same medium risk as in 2021 with 56%. Regional and local radio and television broadcasters, which meet the legally defined criteria (Articles

77-79 of Mass Media Act), have (together with public service broadcasting channels, student media and non-profit media) a status of broadcasters of special importance. In 2022, the approximate value of available funds of the yearly tender for co-financing media content was 3.1 million euros, from which 2,25 million was tentatively available for the area of co-financing of program content of radio and television programs with the status of local, regional, student or non-profit radio or television programs, known also as area B (Ministrstvo za kulturo 2021). When the government announced an adjustment in criteria for evaluating the submitted projects for 2023, it stated quality, originality, communicativeness and topicality of the author's treatment will gain by far the greatest weight, while the importance for an individual region or local community will be the criterion that follows (STA 2022g). After one of Europe's oldest community radio stations Radio Študent, which was established in 1969 by the Student Organisation of the University of Ljubljana (ŠOU), was fighting to retain its financing in 2021, a year later it succeeded to harmonise the Act on the establishment of Radio Študent with the Act on Non-Governmental Organisations. This allowed the radio station to maintain the status of a non-governmental organisation, which is a status a media of special importance needs for obtaining donations and participate in tenders (Bezljaj 2022, A. J. 2022).

The indicator on **Gender equality in the media** scored a medium risk of 65%, which is a 1% decrease from 2021. The share of women on PSM management boards was 30%, the share of women among executives of PSM 25%. The share of women among members of management boards of private TV companies was 44%. The share of women among editors-in-chief in the leading news media was 38%. Several monitorings indicated there are significantly fewer women than men among guests in Slovenian media with the ratio being approximately 24 versus 76% (Mayer 2022). Association Ona ve, which is also a platform for presentation of female experts, alerted to a specific programme on the second programme of TV Slovenia, dedicated to political discussions, was organised several times in a way, that there were no women among guests (Ona ve 2022). They also alerted to the lack of female guests on a talk show, which included female guests in 16,7% of the editions (Ona ve 2022b).

The indicator on **Media literacy** scored the same medium risk as in 2021 with 50%. In February 2022, the government adopted the Promotion of Digital Inclusion Act, which among other introduced digital vouchers for 150 euros to be used for buying computer equipment. Vouchers were awarded to elementary school students in the last three grades, high school students, students and seniors over 55, the latter only if they participate in (free) education in the field of digital literacy. Part of the public warned about the discrimination against the elderly in this conditioning and all activities related to the implementation of these trainings for adults were eventually stopped (Črnko 2022). In August 2022, the Ombudsman also stated he expects the amendment of the act introducing the vouchers to be prepared as soon as possible, according to which it will be possible to obtain the voucher even for those over 55 years of age without fulfilling the additional condition of participation in education (Varuh človekovih pravic 2022, La. Da. 2022c). The Ministry of Digital Inclusion announced an amendment of the law, stating vouchers will now be given only to the socially disadvantaged. Media education for radio, television or print is included in the primary school education curriculum as an optional course, so is computer science (Ministrstvo za vzgojo in izobraževanje 2023), while in the general secondary school it is neither a mandatory nor an optional course. There are of course certain vocational secondary schools, dealing with these topics (Ministrstvo za vzgojo in izobraževanje 2023b).

Focus on the digital environment

The digital variables within this area scored a high risk of 68%. Based on Eurostat data half of the population has basic or above basic overall digital skills (Eurostat 2022).

The indicator on **Protection against disinformation and hate speech** scored a high risk to media pluralism of 88%, while in 2021 it scored 92%. The Eurobarometer Media & News Survey conducted in Spring of 2022 showed almost a third of participating Slovenians (29%) believe they have "sometimes" been personally exposed to disinformation or fake news in the last 7 days. 24% answered this happened "often", while 17% answered it happened "rarely" and 13% answered it happened "very often". The percentage of answers "very often" and "often" were higher than the EU average (Eurobarometer 2022).

The research on the effects of the COVID-19 pandemic on the lives of people, conducted by National institute for public health, showed an increase of disinformation in the times of the epidemic (Hočevar Grom, Belščak Čolaković, Lavtar & Rehberger 2022).

In January, Oštro's project on fact-checking Razkrinkavanje was part of more than 80 editorial offices, which wrote to YouTube, warning the company to take action against the spread of disinformation on the platform (IFCN 2022).

There have been scattered campaigns ran by non-governmental organizations carried out to combat hate speech, however their efficiency has been very limited. Hate speech is very common online and carried out by visible politicians as well. A step forward was seen with the government ran by Robert Golob, as the government's Minister for Digital Transformation Emilija Stojmenova Duh announced a fight against online hate speech before the beginning of her mandate. In October 2022, the Prime Minister announced the government will declare war on hate speech and the area will be one of their priorities in the next six months (Vladžija & Roglič 2022).

4. Conclusions

In general, the findings of the MPM2023 implementation indicate an overall high risk to media pluralism in Slovenia. The highest risk to media pluralism was again indicated in the area of Market Plurality (76%), where Editorial independence from commercial and owners influence scored the highest risk with 90%. This area was followed by Political Independence (65%), where the highest risk for media pluralism was indicated in Independence of public service media (96%). The area Social Inclusiveness followed with 64% and the highest risk within this area was observed in Protection against disinformation and hate speech (88%). The area Fundamental Protection scored the lowest risk to media pluralism among all areas with 44%. The highest risk in this area was indicated in Independence and effectiveness of the media authority (57%).

The findings of the monitoring indicate several ongoing issues are still present. Such is the criminalisation of defamation and the legal provisions regarding the right of reply and correction, frequent attacks and harassment of journalists online and in person, which are often specifically directed at female journalists, the lack of an anti-SLAPP framework and the weak enforcement of the access to information legislation. Concrete policies aimed at countering the spread of disinformation and measures, which would efficiently address online hate speech, were still lacking in 2022. Both horizontal and cross-media concentration remain an issue, so does the transparency of media ownership, financing and state advertising. The lack of data on these issues presents an ongoing high risk to media pluralism in Slovenia and the need to comprehensively tackle these issues with up-to-date legislation is growing yearly. Despite certain legislative changes in 2022 key media laws still need to be adapted to the digital environment. Forecasts of media revenues scored a high risk in the audiovisual, radio and newspaper sector and several lay-offs of journalists, which were announced, and those that have already occurred indicate that the Slovenian media are on the verge of financial sustainability. The issue of political independence was primarily seen and felt through the discussions and controversies surrounding the public service broadcaster, as the former government prolonged its influence and control over the public broadcasting through the staff and management, which were appointed during the previous government or selected among the open supporters and members of the previous government. While the reform of the law regulating the national public service broadcaster was initiated by the new government, there are still issues with the law in 2023 and thus also continuing discussions about the political control over broadcasting, as well as the proper way to ensure political independence of media in Slovenia in general.

Recommendations

Fundamental Protection

- strengthening the enforcement of the access to information legislation;
- revising the legal provisions governing the right of reply and correction;
- there are still some geographic areas, which are relatively poorly covered with digital access, and immediate measures by the ministry of infrastructure, economy and other relevant ministries are needed. These ministries should adopt legal measures to enforce full coverage of all areas and thus provide full digital accessibility to all demographic and geographic groups;
- developing and implementing a comprehensive anti-SLAPP framework.

Market Plurality

- ensuring transparency of media ownership and financing in all media sectors;
- revising the legal provisions regulating horizontal and cross-media concentration to prevent a high degree of concentration;
- increasing the efficiency of the agency, responsible for the enforcement of antitrust and merger control rules, when deciding on media-related cases.

Political Independence

- finalisation of reform of ZRTVS-1 and ensuring autonomous and professional functioning of the public broadcaster;
- strengthening legal safeguards preventing political interference in editorial decisions;
- adopting legal measures preventing conflicts of interests between owners of media and the ruling parties, partisan groups or politicians;
- revising the legal provision regulating political advertising and campaigning and adapting them to the digital environment;
- regulating and ensuring transparency of state advertising.

Social Inclusiveness

- full implementation of the Criminal Code, which punishes also certain forms of hate speech, including the one in the media, should be provided by prosecution and the court as requested by the judicial judgement of the Supreme court from 2019;
- providing systematic long-term funding for media, devoted to different groups, without tenders and calls, that would help establish long-term functionality.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Marko</i>	<i>Milosavljevic</i>	<i>Professor</i>	<i>University of Ljubljana</i>	X
<i>Romana</i>	<i>Biljak Gerjevic</i>	<i>Research assistant</i>	<i>University of Ljubljana</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>Tanja</i>	<i>Kerševan Smokvina</i>	<i>Ex-State Secretary / Regulatory Expert</i>	<i>Faculty of Social Sciences, University of Ljubljana</i>
<i>Nika</i>	<i>Kunaver</i>	<i>Journalist / Management Board Member</i>	<i>POP TV / Slovene Association of Journalists</i>
<i>Cene</i>	<i>Grčar</i>	<i>Legal Expert</i>	<i>Pro Plus TV / Association of Broadcasters</i>
<i>Melita</i>	<i>Poler Kovačič</i>	<i>Professor of Journalism</i>	<i>Faculty of Social Sciences, University of Ljubljana</i>

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