



Uncovering news deserts in Europe

Risks and opportunities for local and community media in the EU

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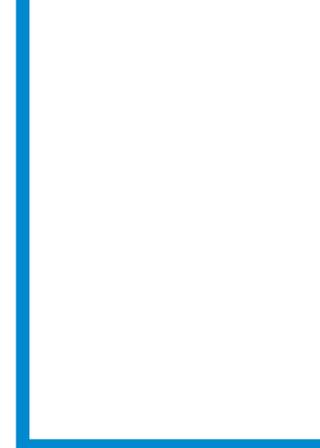


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Executive summary

This research is focused on detecting challenges and opportunities for local and community media and identifying news deserts in the 27 EU Member States. It entails a holistic approach towards **the concept of news desert**, interpreting it as an area that is lacking sufficient, reliable and diverse information from trustworthy media sources.

The risk for local and community media has been assessed through several indicators which are related to the number of media outlets, economic and political conditions, as well as degree of safety of local journalists and the social inclusiveness of local and community media towards minorities, marginalised communities and the capability of engaging with the audience. This investigation also identified examples of best innovative practices in the local and community media sector that could be deemed beneficial for a vibrant and open public sphere. The study's holistic approach considers the complexities and specificities of local media markets in each EU Member State. In some countries, the issues and challenges for local media are widespread across the entire country – while in others, these challenges are limited to specific regions or even cities – leaving certain communities without access to local media that disseminate public interest information. This assessment is not fixed in time and requires continuous monitoring.

Looking at the existence of local media and local journalists on the ground, the situation for news services in rural areas is increasingly problematic, due to both issues related to distribution and a decreasing number of points of sale, as well as to the digital shift coupled with an ageing rural population. Furthermore, newsrooms and journalists are increasingly centralised in the main regional cities, reaching the most remote areas only occasionally or conducting desk journalism exclusively. Public service media, often entrusted with covering the entire national territory, has proven to be crucial in guaranteeing an adequate coverage of regional and local areas, both geographically, and in terms of offering services in minority languages.

Regarding the economic situation for local and community media and their editorial independence, the most pressing issue concerns the intertwining of decreasing advertising revenues and a biased allocation of state advertising and subsidies to local media. Furthermore, problems are related to the rapid digital transition paired with the unwillingness of the audience to pay for news, exacerbating the challenges to the sustainability for local and community media across the EU. Political and commercial control over local media is mostly affecting areas of Central and Southeastern Europe (CEE and SEE), thus having a detrimental effect on trustworthiness and diversity of information sources. Looking at the safety of local journalists, unsatisfactory working conditions for especially freelancers and self-employed journalists and online attacks against them are on the rise. Social inclusiveness appears to be particularly problematic with regard to the coverage of marginalised groups, such as women, the LGBT+ community, the elderly, and people with disabilities. This is due, firstly, to their specific and in some cases smaller audience. Secondly, little research has been conducted in many EU countries on this topic.

Some shining examples of successful local and community media practices were noted specifically related to audience engagement and participation, slow journalism, newsletters, and podcasts, to name a few. The aim of using alternative formats is to proactively involve the public, restore trust, and to attract an audience that previously was not interested in news content and increase subscriptions.

The conclusions of this study are accompanied by recommendations for improvement in each specific area; it is important to note that an urgent issue to be addressed relates to the lack of data related to the economic and financial information for both local and community media, as well as locally focused audience measurements and more detailed research on trust, audience perspectives, perceptions and engagement within local media markets. The community media sector is particularly affected by this issue compared to local media. In order to assess the issue of news deserts in Europe adequately, efforts should be made for these data to be made public and accessible.

The final recommendations are based on the comparative results of this research and inspired by the suggestions of the research teams involved throughout the EU. We would like to take this opportunity to particularly thank the LM4D researchers of their respective countries for doing an impressive job of documenting their local and community media situation. The results of this study will enable more detailed and locally focused future research on this often-neglected topic, strengthen the position of local and community media representatives to further advocate for their interests, as well as offer guidelines to policymakers to support and enable a favourable environment for this media sector, considering its crucial democratic role for local communities.



Introduction

Local Media for Democracy (LM4D)¹ is a multidisciplinary research project aimed at assessing the state of play for local and community media in Europe, identifying news deserts in the areas and/or communities where these outlets are at high risk of experiencing challenges in the dissemination of diverse and quality information. An additional aim of this study is identifying which are the relevant dimensions for studying the phenomenon of news deserts in a European context, and offering examples of best practices in the organisation and innovation of local newsrooms throughout Europe.

The theoretical part of the project – concerning the main definitions used across the research, such as ‘news deserts’, ‘local media’ and ‘community media’ applied to the European Union context, but also ‘minority’ and ‘marginalised community’ – has been developed through bibliographical and desk research.²

Dominant methodological approaches for studying the news deserts phenomenon in local contexts have been developed in the United States since the late 2000’s, laying the foundation for addressing the issue on a “multi-level analytical framework.”³ However, no comprehensive attempt has been developed for the European Union so far, a region that is composed of a great variety of socio-political contexts, languages, and media systems. As demonstrated in the following sections, the definitions of local and community media are highly contested, characterised by a “lack of consensus on the meaning of key terms, which are often taken for granted or defined only implicitly.”⁴ Moreover, definitions need to be looked at through the prism of the various national media systems, since their meaning can be quite specific⁵.

These differences relate, for example, to the size and demographics of a country and/or the number of minorities or marginalised communities; the size and characteristics of the media market, the assurances provided to local journalists in terms of working and physical safety; the independence from political and economic pressures; the professionalism of local journalists; and investments in innovation. This research ultimately aims to develop a ‘news deserts’ definition that is context-based, considering the actual situation of local and community media in the European Union.

There is no consensus on a common definition of local media, either from a legal or academic perspective. As suggested by Gulyas, this term is subject to several interpretations and could, in-

1 <https://cmpf.eui.eu/local-media-for-democracy-project/>

2 See the preliminary theoretical study for the LM4D research: T. Blagojev, D. Borges, E. Brogi, J. Kermer, M. Trevisan, S. Verza, ‘News desert in Europe: Assessing risks for local and community media in the 27 EU Member States’, Centre for Media Pluralism and Media Freedom, European University Institute, 2023: <https://cadmus.eui.eu/handle/1814/75762?show=full>; See the “Glossary” <https://cmpf.eui.eu/local-media-for-democracy-project/local-media-for-democracy-methodology/>.

3 L. Friedland, P. Napoli, K. Ognyanoba, C. Weil and E. J. WilsonIII, Review of the Literature Regarding Critical Information Needs of the American Public, 2012, https://transition.fcc.gov/bureaus/ocbo/Final_Literature_Review.pdf

4 A. Gulyas and D. Baines, The Routledge Companion to Local Media and Journalism, 2020, Routledge, p. 2.

5 A. Gulyas and D. Baines, The Routledge Companion to Local Media and Journalism, 2020, Routledge; R. K. Nielsen, Local Journalism: The Decline of Newspapers and the Rise of Digital Media, 2015, I.B. Tauris.

deed, represent print media with an audience of millions of individuals in large capitals, but also digital editions that target several hundred in rural areas of a country.⁶ The difficulty in defining what local media is, stems from several factors: for example, the relevance a particular news might have in a specific context. An outlet that can be considered local in geographical coverage terms, might produce news that is not about the community or also significant for a national audience. Due to digital transformation and the process of digitisation of local media outlets, opportunities for new forms of local news and communication have widened; however, as evidenced by Napoli, the consequences of rapid technological developments may provide the means to deceive and obfuscate what qualifies as genuinely 'local'.⁷ Another concept to consider, in this context, is that of **"hyperlocal" media**. Despite its frequent use in the literature, as in the case of "local" and "community" media, there is no agreement on a common definition.⁸ Hyperlocal media can be considered as independent entities which are unrelated to large corporate media companies or conglomerates⁹ as well as "a special brand of alternative local news businesses: local online initiatives that aim to produce news gathered in, and focused on, a designated local area."¹⁰

Jangdal has argued that this term is primarily used to describe new (often online) independent approaches to providing local news.¹¹ Nonetheless, other researchers have proposed not to provide a too strict and ultimate definition of this type of media due to rapid changes in the hyperlocal sphere.¹² Research on hyperlocals is particularly developed in Northern Europe.

In addition to spatial or demographic considerations, one also has to consider the socio-political dimension of local media, their relations with the communities they serve, and the role of these outlets in the wider media environment. The definition is, therefore, also related to how local media relate to society at large: local, in this sense, "is a concept that connects geography and place with a sense of belonging"¹³ and local media, with their reporting, are essential in providing "social cohesion", connecting members of the community and developing a sense of communal "solidarity".¹⁴

While there is no common definition on what local media is, it can be reasonably argued that local media are "primarily oriented towards covering more circumscribed geographic areas than national and international media."¹⁵ Moreover, there is a general agreement on the social relevance of the existence of local media: local media are important in today's society as "such media can offer important opportunities for fostering participatory deliberative democracy at the regional or local level and for the development of regional or local identities, including those of national minorities."¹⁶

This research defines local media as outlets operating across various sectors (print, audiovisual, radio and digital) at different sub-national levels, and catering to local and more geographically circumscribed audiences.

- 6 A. Gulyas, 'Local and community media in Europe. A comparative analysis of the Media Pluralism Monitor data between 2020 and 2023', Centre for Media Pluralism and Media Freedom, European University Institute, Research Project Report, 2023. <https://cadmus.eui.eu/bitstream/handle/1814/75950/QM-07-23-384-EN-N%5b84%5d.pdf?sequence=1&isAllowed=y>
- 7 P. M. Napoli, 'Place/Space and the Challenges Facing Local Journalism and Local Journalism Research', *Journalism & Communication Monographs*, 21(2), pp. 147-151, 2019
- 8 D. Harte, R. Howells and A. Williams, 'Hyperlocal Journalism: The decline of local newspapers and the rise of online community news', Routledge, 2018.
- 9 S. Barnett and J. Townend, J., 'Plurality, Policy and the Local'. *Journalism Practice*, 9(3), pp. 332-349, 2015.
- 10 M. van Kerkhoven, M., 'I've Started a Hyperlocal, So Now What?', in A. Gulyas and D. Baines (Eds.), 'The Routledge Companion to Local Media and Journalism', Routledge, p. 250, 2020
- 11 L. Jangdal, 'The Importance of Being Nearest: Audience Perceptions of Hyperlocal Media in Sweden', *Problemi dell'Informazione*, 1, pp. 3-27, 2021.
- 12 C. Lindén, M. Grönlund, J. Hujanen, O. Dovbysh, K. Lehtisaari, and C. Tenor, 'Resilience of Hyperlocal Media in a Global Media Environment'. In K. Jan and P. Tassilo (Eds.), 'Handbook of Media and Communication Economics: A European Perspective'. Springer, 2022.
- 13 K. Hess and L. Waller, 'Local Journalism in a Digital World'. Palgrave, p. 6, 2017.
- 14 The Future of Media Commission, 'Report of the Future of Media Commission', 2022.
- 15 R. K. Nielsen, 'Local Journalism: The Decline of Newspapers and the Rise of Digital Media', I.B. Tauris, p. 53, 2015.
- 16 OSCE (HCNM), The Tallinn Guidelines on National Minorities and the Media in the Digital Age & Explanatory Note. OSCE High Commissioner on National Minorities (HCNM), 2019, p. 53, <https://www.osce.org/files/OSCE-Tallinn-guidelines-online%203.pdf>.

The **definition of community media** is also contested. Community media represent one more type of subnational media where their focus on serving a particular community is key for understanding their role in the media system. The Council of Europe considers this type of media as working on specific communities, sometimes together with them. Thus, when considering the term “community” more generally, it can be viewed either as a geographically defined entity or as a social group unified by a common “identity or experience.”¹⁷ Considering that community media are crucial in a media system characterised by pluralism and diversity,¹⁸ the Council of Europe and the European Parliament pointed out that states should legally recognise these media and ensure their financial sustainability.¹⁹ Furthermore, it has been observed that community media are particularly beneficial for specific minority or marginalised communities that feel isolated by the absence of mainstream media covering certain issues or offering biased and inaccurate coverage.²⁰ To further corroborate the difficulties in finding common standards, the data retrieved from the Media Pluralism Monitor 2023 reveal how the legal recognition of community media is still fragmented across Europe. Moreover, in some countries, the definition is subsumed under other media typologies. This, in turn, has consequences in terms of availability and potential support to the community media sphere.²¹

Despite the different definitions local and community might have, a common agreement is that they play a special democratic role due to proximity and the closer relationship that these media usually establish with the people from the areas or communities they cover compared to national media. Trust is facilitated through these channels of communication because place-based and community-based identities facilitate recognition with these outlets and their stories.²² Moreover, they usually cover issues, such as local politics and other critical local information, that are under-represented or absent from the national media content.²³ However, the local media sector in the EU is experiencing a crisis, arguably even more accentuated than the general crisis of the traditional media sector, not only from the point of view of its market viability and sustainability, but also from the point of view of political independence, the capability of offering a socially inclusive coverage of news and events, including the coverage of minorities and marginalised communities, and the risks for local journalists’ safety.

For these reasons, this research considers a

News desert as a geographic or administrative area, or a social community, where it is difficult or impossible to access sufficient, reliable, diverse information from independent local, regional and community media.

17 H. Peissl, J. Purkarthofer, N. Bellardi, S. Scifo, ‘Community media, contributions to citizens’ participation’, 2022: <https://rm.coe.int/community-media-contributions-to-citizens-participation-en/1680a94cd5>

18 S. Buckley, ‘Community Media: A Good Practice Handbook’. UNESCO, 2011

19 Council of Europe, Recommendation CM/Rec (2022)4 of the Committee of Ministers to member States on promoting a favourable environment for quality journalism in the digital age. https://search.coe.int/cm/pages/result_details.aspx?objectid=0900001680a5ddd0; European Parliament resolution of 25 November 2020 on strengthening media freedom: the protection of journalists in Europe, hate speech, disinformation and the role of platforms (2020/2009(INI)): https://www.europarl.europa.eu/doceo/document/TA-9-2020-0320_EN.pdf.

20 A. R. Arguedas, S. Banerjee, C. Mont’Alverne, B. Toff, R. Fletcher and R. K. Nielsen, ‘News for the Powerful and Privileged: How Misrepresentation and Underrepresentation of Disadvantaged Communities Undermine Their Trust in News’, Reuters Institute for the Study of Journalism, 2023.

21 A. Gulyas, 2023.

22 A. Wenzel, ‘Community-Centered Journalism: Engaging People, Exploring Solutions, and Building Trust’. University of Illinois, 2018.

23 See the definition of Critical Information Needs (CINs) in the ‘Glossary’ of this study: “CINs refer to the essential information that allow members of a community to make informed decisions on the topics that affect the quality of their lives and take appropriate actions. This can include information related to their health, safety, well-being, education, employment, public transport, voting procedures, budget issues, infrastructure, and other areas of concern. The critical information needs of a local community may include access to accurate and timely information about local events, emergency alerts, public health issues, environmental hazards, and other relevant topics”. <https://cmpf.eui.eu/local-media-for-democracy-project/local-media-for-democracy-methodology/>



Methodology

For the mapping of ‘news deserts’ in the European Union, the LM4D Project has counted on the collaboration of country-based researchers who analysed the situation of local and community media in their respective countries, indicating the level of risk for local and community media outlets, and consequently signalling the existence or potential emergence of ‘news deserts’ across the 27 EU member states. For this part of the research, the main method used was the collection of data and information on a country basis through the answering of a structured questionnaire by the researchers.²⁴ The methodology builds on the 10 years of experience of the Media Pluralism Monitor project by CMPF.²⁵

The questionnaire consists of **55 questions (variables)** of legal, economic and socio-political nature, clustered into 6 indicators. It is built in a way that allows for the gathering of both quantitative and qualitative data, and for cross-comparative analyses between EU member states. The data gathered with the questionnaire have been reviewed by the CMPF researchers and finally compiled in this final report, divided into country sections, by the respective authors.

The questionnaire is composed of 12 **contextual variables**, considered as independent variables for the purpose of this research.²⁶ They cover general questions about the country size, population, general state of play in the local and community media sector. No risk score is associated with these questions. Following the above-mentioned section, the questionnaire is composed of 6 indicators aimed at evaluating the risks for local and community media, in the countries under study. These indicators are:

- **Granularity of the infrastructure of local media:** This indicator assesses the presence and offer of local and community media services in a country, for rural suburban and urban areas, as well as the presence of local journalists, both in private media and in the PSM.
- **Market and reach:** This indicator assesses the economic conditions, the viability and sustainability for local and community media in the country. It investigates revenues, supply distribution levels, subsidies, state advertising and market shares. It is composed of 13 variables.
- **Safety of local journalists:** This indicator assesses the situation for local journalists when it comes to their working and physical safety, also assessing the presence of SLAPPs or other forms of harassment. It is composed of 6 variables.
- **Editorial independence:** This indicator assesses the independence of local and media from political and commercial pressures. It investigates the risks of conflict of interest, the fairness and transparency in the allocation of state subsidies and state

24 See the “Questionnaire” <https://cmpf.eui.eu/local-media-for-democracy-project/local-media-for-democracy-methodology/>

25 Media Pluralism Monitor: <https://cmpf.eui.eu/media-pluralism-monitor/>

26 See the “Methodology” <https://cmpf.eui.eu/local-media-for-democracy-project/local-media-for-democracy-methodology/>

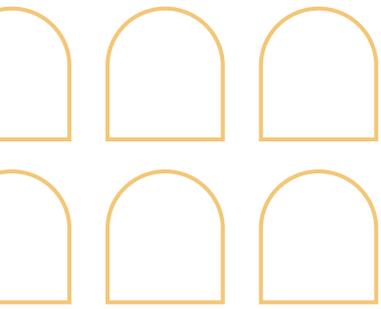
advertising, the governance of the local branches of the media authority and of the PSM, the diversity of news content. It is composed of 8 variables.

- **Social inclusiveness:** This indicator assesses the extent and quality of news offered for and about minorities and marginalised communities, and whether local and community media meet the critical information needs of the community they serve, and if they offer public interest news. It is composed of 7 variables.
- **Best practices and open public sphere:** this indicator assesses the actual existence of innovative practice for enhancing an open and thriving public sphere in specific communities, not only by professional media services but also, for example, through citizens' initiatives and social media²⁷. It is composed of 2 variables, and no risk score is associated with these questions.

The preliminary report “News desert in Europe: Assessing risks for local and community media in the 27 EU Member States”, published in July 2023 as part of the LM4D Project, explains the reasons why – considering the existing literature on the state of local and community media in Europe – these dimensions have been identified as worthy and relevant of investigation.²⁸ The following chapters will delve into the findings for each of the countries under study.

27 “Other media actors”, as defined in the Glossary.

28 T. Blagojev, D. Borges, E. Brogi, J. Kermer, M. Trevisan, S. Verza, ‘News desert in Europe: Assessing risks for local and community media in the 27 EU Member States’, Centre for Media Pluralism and Media Freedom, European University Institute, 2023: <https://cadmus.eui.eu/handle/1814/75762?show=full>.



Austria

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Context

Local and regional journalism has moved onto Austrians' political agenda as relevant to democracy and as a locus of public connection¹ against the backdrop of digital transformation and changing democratic practices. In this project, news deserts are understood as areas where the citizens do not receive public interest information. According to this definition, Austria does not (yet) have to contend with the phenomenon of news deserts. Local and regional media cater to the rural, suburban, and urban areas; typically, with at least one daily newspaper, a number of local titles (print and online), several commercial private and non-commercial community broadcasters (radio and TV) and one regional studio of the PSM in each federal state. However, each region is characterised by a dominant media outlet, prominently represented in all sectors, which raises concerns about plurality, particularly when considering current funding practices and structural conditions.

Around two out of Austria's nine million residents live in the capital Vienna, which is also one of the nine federal states. The other larger cities, with around 130,000 to 300,000 inhabitants, are the provincial capitals of Graz, Linz, Salzburg and Innsbruck. GRP per capita in the NUTS2 regions are below average in the east and south (with the exception of Vienna) and above average in the west. This coincides with regions of lower media coverage. Internet usage penetration is 94% with a less pronounced east/south-west gradient, while the download speed in rural regions is lower than in Vienna.²

The media are mainly a national responsibility. Notably there is no legal definition for "local media", but one can proceed on the legal guidelines for the allocation of subsidies.³ It is common practice for regional media to refer to the federal provinces and local media to one or more municipalities or districts. The law⁴ anchors community media as "non-profit" acting "in the local or regional area".

There are currently no "local news deserts" in Austria that could be binary coloured mapped for the purpose and according to the definitions of this project. However, it was clearly revealed that major closures of local media outlets, which would lead to "news deserts" in several areas of Austria,

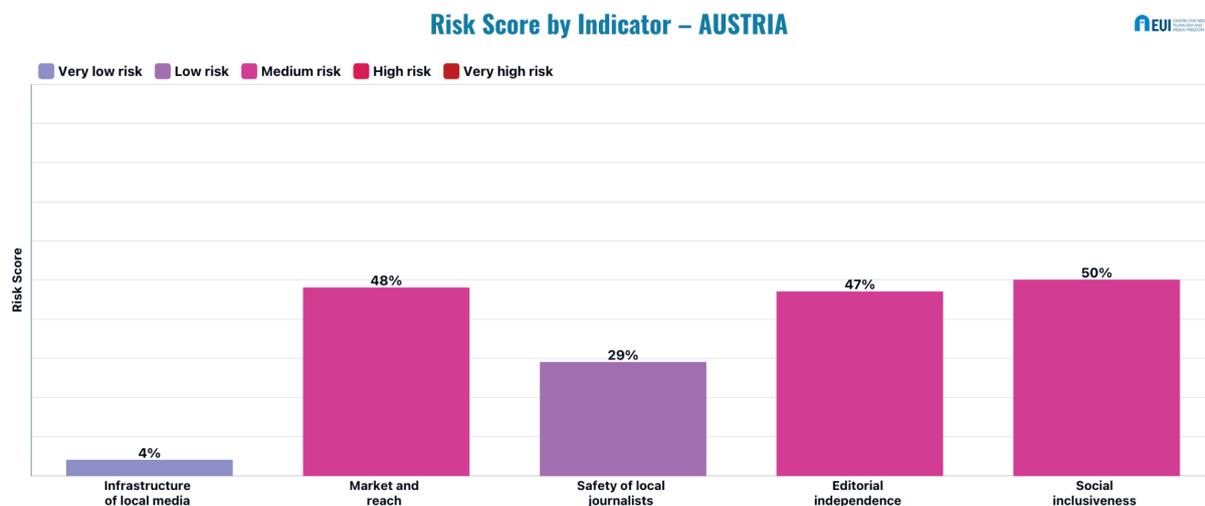
1 N. Couldry and T. Markham, Public connection through media consumption: between oversocialization and de-socialization? *The Annals AAPSS*, 608(1), 2006, p. 251-269.

2 Statistik Austria: www.statistik.at; 94% avg in 2022 ranging from 82% to 98% in the federal states

3 www.rtr.at/medien/was_wir_tun/foerderungen/Startseite.de.html.

4 *KommAustria Act*, §29. www.ris.bka.gv.at.

are imminent in the medium term. An adequate response is needed: on the one hand by reorganising structural conditions (e.g. reducing concentration; supporting accountability) and on the other hand by transforming the funding logic towards journalistic quality and democratic relevance (in terms of content, proportionality and fair allocation rules), favouring also the local and regional media environment including smaller, innovative outlets.



Granularity of infrastructure of local media - Very low risk (4%)

In Austria, there is a historically grown, relatively dense and well-developed local and regional media landscape; the connection with the communities they serve is often close. There are differences between the provinces regarding coverage and reach as they are lower in the Eastern provinces than in the West of the country, with the exception of and partly because of the closeness to Vienna.⁵

TV-News are the main sources of information in Austria.⁶ The regional PSM stations and their correspondents are located in the capitals of the nine provinces, recording top ratings in terms of reach and market share: ORF radio stations account for three in four of the radio minutes listened to.⁷ Promoting national and regional identity is one focus of the PSM's core mission, which is implemented through nine regional radio channels and regular regional TV-news.⁸ Additionally, there are about 25 private TVs and 60 radio stations in the regional markets, showing typically significantly lower reach,⁹ as well as 14 licensed community radios and three TV-stations (plus some online titles outside the Association of Community Media), seven of which are located in rural areas.¹⁰ Their *Cultural Broadcasting Archive* became Austria's largest podcast provider.

The dominant major media outlets produce dailies and cross-media content with a high regional reach of 40% up to over 60%, similar to the hundreds of mostly weekly local print and online titles.¹¹ Most of the latter prioritise entertainment or local events rather than news. Tabloids and free newspapers in Vienna achieve comparable reach,¹² while their clones attract large communities in the provinces. Daily newspaper supply in the Eastern provinces is dominated by Viennese titles, as its suburban regions are located in these surroundings.¹³ In addition to a wide range of city newspapers and magazines, providing innovative multimedia contents, most nationwide media have their headquarters in Vienna, offering coverage on local

5 VÖZ, 2022, www.medienhandbuch.at.

6 Reuters Digital News Report - Details for Austria 2020, 2023: <https://digitalnewsreport.at>.

7 About 1.36 million daily viewers, and 2.1 million listeners daily on ORF regional TV & radio. ORF is obliged by law to operate broadcasting studios in all nine federal states.

8 ORF Act, §§ 4, 3, 5, 31. Austrian parliament: www.parlament.gv.at/aktuelles/pk/jahr_2021/pk1320.

9 VÖZ, 2022, www.medienhandbuch.at. Market entry of private broadcasters: mid 90s.

10 www.freier-rundfunk.at. VFROE, 20 Jahre on air, 2018: Technical reach: 6,923,000.

11 Media-Analyse, 2022, www.media-analyse.at. The Association of Regional Media in Austria represents around 240 regional newspapers.

12 There are also nationwide quality newspapers that reach a percentage of the tabloids: 5%-11% in Vienna, 1%-5% in the regions. VÖZ, 2022, www.medienhandbuch.at.

13 Media-Analyse, 2022, www.media-analyse.at.

issues. Compared internationally, regional journalistic online services are (still) underdeveloped, particularly regarding digital natives.¹⁴ However, the print and broadcast legacy media operate websites and social media channels. Correspondents of the Austrian Press Agency (APA) are located in all provincial capitals.

Market and reach - Medium risk (48%)

Based on the available data, a mixed picture emerges regarding the financial situation of Austria's local media sector. In recent years, the majority of media companies have seen their revenues decline, while others have recovered after a slump during the first year of the pandemic. In general, stagnating sales figures coupled with rising costs (distribution, paper price, etc.) have heightened economic pressures; certain politicians and audiences are also calling for austerity measures concerning PSM (in terms of structures and also referring to the regional stations). Although, there have not yet been significant closures in any of the sectors, a wave of closures is expected in the medium term.

Austria provides a wide range of media subsidies on the national level;¹⁵ some of them are focused on regional diversity, others are available in particular for those who are not only of local interest and are distributed in more than one federal state. Funding from the federal states is rather low and indirect subsidy means tax reduction in Austria. Subsidies for all media sectors increased from around 37 million euro in 2018 to 124 million euro in 2023 (state advertising from 170 million euro to 200 million euro, while the provinces (-9%) and the national government (-38%) reduced payments in 2023). The top 20 beneficiaries include regional players as well as the Association of Community Media.¹⁶ State subsidies are typically distributed transparently but not fairly, because the funding logic does not support journalistic quality and democratic relevance (in terms of content, proportionality and fair allocation rules), it rather favours large legacy media with high reach or circulation, while small, innovative outlets are not supported sufficiently. This is also true for the new well-endowed fund to promote digital transformation, as digital natives cannot apply and the funding rate is 50%. This practice encourages mergers: regional publishing houses currently operate—after highly complex joint ventures—in an increasingly concentrated form and with constantly changing business models. Four of them hold a total market share of around 16%, and over 70% in the regional market.¹⁷

The market share of the largest private TV-broadcaster is 4.3%,¹⁸ while the PSM holds more than one-third of the TV-market. ORF's total radio market share is about 75% (PSM regional radios: 35%); the one of the private commercial radios is about 25%. According to the "Radiotest" slight losses or stagnation in reach occurred in recent years, with some exceptions.¹⁹ More than 60% of the PSM is financed by programme fees, replaced by a household levy from 2024. In addition, the ORF finances itself with advertising and other sales.²⁰ Commercial broadcasting is financed by advertising and funding, recording stagnating or declining advertising revenues that, according to VOEP²¹ are rather flowing to international online platforms. Compared to the ORF, the Commercial Broadcasting Fund corresponds to around 3%. Experts consider this to be sufficient, as long as "the journalistic output of local private-commercial media tends to focus on entertainment rather than local information, culture or identity."²² The leeway of private commercial media is large, when contrasted with that of community media: They receive significantly lower funds (one quarter) and lack advertising revenues as they are by definition "non-commercial". Nevertheless, the

14 Kaltenbrunner et. al., *Der Journalismus Report VII*, 2022. This field is emerging.

15 www.rtr.at/medien/was_wir_tun/foerderungen/Startseite.de.html.

16 Community Media only in the case of subsidies. Calculations based on: www.medien-transparenz.at.

17 Calculations based on access-restricted data provided by H. Fidler, <https://diemedien.at>.

18 4.3% Servus TV; all national private TV-stations together hold around 10%.

19 Daily reach 2018 to 2022. Calculations based on access-restricted data provided by H. Fidler, 2022, <https://diemedien.at>/ VÖZ, 2019, 2020, 2021, 2022, www.medienhandbuch.at.

20 In general, there are restrictions, while regional ORF-stations are allowed for their own advertising activities. ORF, 2023, <https://der.orf.at>.

21 Managing director of the Association of Private Broadcasters Drumm, 15.06. 2023 (email); while radio marketer RMS Austria reported a steady increase in revenues.

22 Expert Medienhaus Wien Kaltenbrunner, 16.06.2023 (in-person).

Non-Commercial Broadcasting Fund has recently been substantially increased²³ and community media also benefit from EU-funding or other funds (for minorities, digital transformation, etc.). Still, without many volunteers, non-profit community broadcasting would not be able to fulfil their democratic role for economic reasons.

Austria's local and regional print titles are mainly distributed by subscriptions or advertising-financed free content to all households. The number of sales outlets ("Trafiken") has declined sharply.²⁴ Instead, the postal service monopoly acquired a crucial structural role as well as increasing costs for distribution. The current recovery trend has not yet reached pre-pandemic levels²⁵ and the reach of regional print titles is dropping.

Particularly small, innovative digital natives face poor funding conditions. According to the available data the reach of larger regional platforms and of PSM's orf.at increases (from 55.6% in 2018 to almost 70% in 2022).²⁶ The wider use of paywalls for online content coincide with increasing willingness to pay (at least for digital services of regional legacy media that is considered trustworthy).²⁷

Safety of local journalists - Low risk (29%)

The journalistic centre of the country is Vienna, where about 56% of all full-time journalists live and work. One third of all (about 5350) Austrian journalists are salaried local journalists, plus around 20% freelancers.²⁸ Access to the journalistic profession is open, i.e. there are no legally mandatory educational requirements. While the average age is increasing, local journalists are sometimes very young, with significantly more female part-time contracts. The salary of local journalists is below the nationwide average;²⁹ many freelancers practise journalism as a sideline (and little is known about the conditions and social protection, although legislation guarantees minimum wages) and regarding community media, most contributors are volunteers.

Perceived job security decreases as technological change, the pandemic and distrust of journalism in general are causing uncertainty.³⁰ Although independent journalism and the safety of journalists is advocated by professional associations³¹ and the Austrian Press Council, the boundaries between sales and editing are difficult to keep, especially in small (local) editorial offices. While attacks on physical safety decreased, there have been more verbal threats online.³² Of the 16 SLAPP-lawsuits since 2010³³ only two were against local media.³⁴

Editorial Independence - Medium risk (47%)

Regarding the audio-visual and radio sector, none of the outlets is owned or controlled by governmental actors. While no legislation in place supplies provisions related to controlling media by politically affiliated actors

23 From three to five million Euro annually from 2022.

24 NÖN, A. Kiefer, 2018, www.noen.at/niederosterreich/politik/trafiken-sterben-der-kampf-ums-ueberleben-trafiken-sterben-josef-pirischl-85996825

25 No data access, information by Dir. of Association of Regional Media Henrich, 13.08.2023 (zoom-call).

26 Calculations based on VÖZ, 2019, 2020, 2021, 2022, www.medienhandbuch.at; Media-Analyse, 2022, www.media-analyse.at.

27 From 9,1% in 2019 to 13.5% in 2022. Own calculation based on Reuters Digital News Report - Details for Austria 2020, 2023, <https://digitalnewsreport.at>.

28 Kaltenbrunner et. al., *Der Journalismus Report VII*, 2022

29 Average salary of Austrian journalists: 3,800 Euro (gross); average Austrian employee: 2,400 Euro.

30 Union of Private Employees-Printing, Journalism, Paper Wolf, 16.06.2023 (in-person); Kaltenbrunner et. al., *Der Journalismus Report VII*, 2022; T. Hanitzsch, J. Seethaler and V. Wyss, *Journalism in Germany, Austria and Switzerland*, 2019, <https://link.springer.com/book/10.1007/978-3-658-27910-3>

31 Professional associations do have regional representations but suffer from a decline in members

32 J. Seethaler, M. Beaufort and A. Schulz-Tomancok, Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report : Austria, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, <https://cadmus.eui.eu/handle/1814/75714>; no detailed data for the local market

33 SLAPPs in Europe (CASE): www.the-case.eu/slapps.

34 European Centre for Press and Media Freedom, 2022, www.mappingmediafreedom.org/#/; Council of Europe, Safety of Journalists Platform, <https://fom.coe.int/pays/detail/11709480>.

(with the exception of PSM), legal entities under public law and political parties are precluded from providing broadcasting.³⁵ Community media are legally part of “private broadcasting” and according to their charter they are independent from influencing actors. The ORF Act (theoretically tries, but) in practice fails to guarantee independence from political influence at the national as well as at the regional level, which is partly about the rules that enable the government to appoint at least a simple majority of the Foundation Council, sufficient for most of its decisions. This “politics-in-broadcasting system” engenders politically motivated entanglements. The weight of the regional directors is remarkable: “Anyone who wants to become head of ORF needs the federal states.”³⁶ In the print sector, no legislation regulates ownership matters regarding their entanglement with the political realm. Yet, there seem to be close ties between certain newspapers and political parties,³⁷ which has led to several resignations of politicians (including the Federal Chancellor). The situation at the regional level can only be surmised. The number of digital native media with a more or less transparent closeness to political actors is growing, like a revival of the “media-party parallelism”, typical of democratic-corporatist countries,³⁸ but without adequate awareness of the influencing potential. There is only one big news agency in Austria whose statutes commit it to political independence.

In terms of state advertising, all political actors are obliged to disclose their media collaborations fully,³⁹ but the law does not prevent preferential treatment, so that supporting the largest tabloids in the country has become an issue.

As only broadcasters are obliged to have editorial statutes, professional associations and the Austrian Press Council are essential in advocating professional standards. The latter, however, may only include print titles, their online platforms, news agencies and community media and its Code of Ethics focuses on economic influence. Several local outlets are committed voluntarily to the Council's Code, but there are no general standards binding all Austrian journalists and the given sanctioning powers are weak. Cases of commercial influence in the advertising-financed processes are reported on the local level. There are no local branches of the media authority, however, it works independently, and its sanctioning powers are usually considered as effective.⁴⁰ But in general, accountability mechanisms at all levels—industry, sector, and company—are underdeveloped, as recent incidents have shown.

Regarding content diversity there are no comprehensive analyses considering the local market. Only one regional print title, highly relevant in two federal states, was analysed recently⁴¹ with the outcome that it devotes significantly more attention to the governing parties than to the parliamentary opposition, while NGOs receive less attention than state actors. Women have a representation of 13%, similar to national Austrian media. These results are consistent with an audience study concerning suspected political independence of the PSM stating that 53% of Austrians doubt that ORF's regional studios can report freely and without political pressure.⁴²

Social Inclusiveness - Medium risk (50%)

Local journalists' professional self-conception not only keeps them in close contact with their audience, they aim to monitor and inform the widest possible audience in the region as well as to point out grievances. Clearly important is “giving `ordinary people` a voice” and “standing up for the disadvantaged”, indicat-

35 J. Seethaler, M. Beaufort and A. Schulz-Tomancok, Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report : Austria, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, <https://cadmus.eui.eu/handle/1814/75714>; ORF Act, Private Radio Broadcasting Act and AVMD (exceptions): www.ris.bka.gv.at.

36 Der Standard, 2022, www.derstandard.at/story/2000141979899.

37 Like the high-circulation tabloid *Oesterreich* and the quality paper *Die Presse*, as exposed by some details of the Economic and Corruption Prosecutor's Office's corruption investigations.

38 D. C. Hallin and P. Mancini, Comparing media systems: Three models of media and politics. Cambridge university press, 2004.

39 Media Transparency Law, www.ris.bka.gv.at. In the past (until 2023), crucial restrictions have resulted in up to half of state advertising not transparent.

40 KommAustria Act, §6, and Art 20 (2) 5a B-VG as amended by BGBl. I 50/2010, www.ris.bka.gv.at.

41 Kleine Zeitung (Styria Media Group for Styria and Carinthia); M. Beaufort, Media in democracy – Democracy in the media, 2020, <https://ediss.sub.uni-hamburg.de/handle/ediss/8998>.

42 Market Institute Linz/Der Standard, 2023, derstandard.at/story/2000142255876/. Additional results: 45% of Austrians think: “Regional politics has too much influence on the ORF regional studio in my province” (29% disagree); 43% miss critical statements in ORF's regional news, for example, from opposition politicians (34% don't).

ing that advocacy journalism is aspired to more strongly than among the entirety of Austrian journalists.⁴³

Nevertheless a study assessing the regional studios of the PSM found that despite a large market share, 45% of Austrians in all provinces think that the "ORF's regional news always focus on the same people."⁴⁴ In contrast, non-profit community media act locally and inclusively through rich participation and are by definition deeply engaged with their audiences, describing their democratically relevant characteristics in their charter.⁴⁵ Aiming on building modern societal and educational media centres, becoming—also physically—forums of inclusive regional togetherness, they are able to develop local discourses that lack attention in the classical media environment. Therefore, the relatively low reach is not the most relevant value when it comes to community media, but the multiplier effect created by the activities in and for a region.

Applying to the entire Austrian audience and its comprehensive information diets, a recent study revealed that news users have distinct expectations of democratic news performance to satisfy their critical information needs.⁴⁶ A comparison of these expectations with the actual news supply in terms of contents showed that especially people who have a participatory understanding of democracy (and thus about one third of the population) do not sufficiently find what they need in Austria's news supply.

Many small newspapers, magazines, blogs and websites address marginalised groups, as well as some prominent outlets, which is either relatively new or niche. Non-profit community media integrate a wide range of minorities into their activities and operate through 41 languages. The PSM is obliged to provide linguistic diversity and representation only regarding the six Austrian legally recognised minorities.⁴⁷ Additionally, a few English and French-language programmes are available. Giving access for persons with disabilities is mandatory to ORF; even private broadcasters have recently been tasked to improve accessibility, but often start at zero (like with minorities).⁴⁸ Because, in the past, the legal provisions were formulated in a non-binding and hardly measurable way,⁴⁹ the overall DARE⁵⁰ only rated 67.5%. However, a recent report notes positive developments in Austria, although there are still gaps in the implementation.⁵¹ Finally, there is a relatively hidden migrant mass media market. Unofficially recognised minority groups are also eligible for media production and occupy a significant part of this market, without governmental support.⁵²

Best practices and open public sphere

A small range of innovative concepts can be found at all levels of the journalistic process. Some projects focus on diversity and inclusion (text-to-speech, etc.) or develop integrative and participatory concepts (e.g. citizen participation, collaborative investigative journalism), others are concerned using new business models (paywalls, user loyalty, etc.). Recently, highly endowed funds were created that provide space for innovation, as they are not tied to content or specific sales models,⁵³ albeit they are primarily available to sizable legacy media. Thus, local journalism is using its potential, as examples from large regional players and some smaller projects show, but a change in funding logic and innovative financing (such as crowdfunding) could bring more innovation.

43 84% of local journalists (vs. 78% of the entirety of Austrian journalists) resp. 83% (vs. 62%). Kaltenbrunner et. al., Der Journalismus Report VII, 2022.

44 Market Institute Linz/Der Standard, 2023: derstandard.at/story/2000142255876.

45 Charta of Austria Community Broadcasters: www.freier-rundfunk.at.

46 Namely according to users' personal notions of democracy. M. Beaufort, *Media in democracy – Democracy in the media*, 2020, <https://ediss.sub.uni-hamburg.de/handle/ediss/8998>; J. Seethaler and M. Beaufort, Community media and broadcast journalism in Austria: Legal and funding provisions as indicators for the perception of the media societal roles, *The Radio Journal*, 2017.

47 Croats, Slovenians, Hungarians, Czechs, Slovaks, Roma. *ORF Act*, §4: www.ris.bka.gv.at. During the pandemic there were special activities in many languages.

48 *ORF Act*, §5; AVMD, § 30: www.ris.bka.gv.at.

49 E.g. "economic reasonableness" (*ORF Act*); "gradual improvement of accessibility" (*Audiovisual Media Services Act*)

50 DARE (Digital Accessibility Rights Evaluation) index

51 J. Seethaler, M. Beaufort and A. Schulz-Tomancok, Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report : Austria, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, <https://cadmus.eui.eu/handle/1814/75714>.

52 Y. Andakulova, Minority Media in Austria: Case Study Analysis of the Status Quo of Linguistic Diversity in the Austrian Media Landscape, *Global Media Journal*, 2023.

53 See for details www.rtr.at.



Belgium

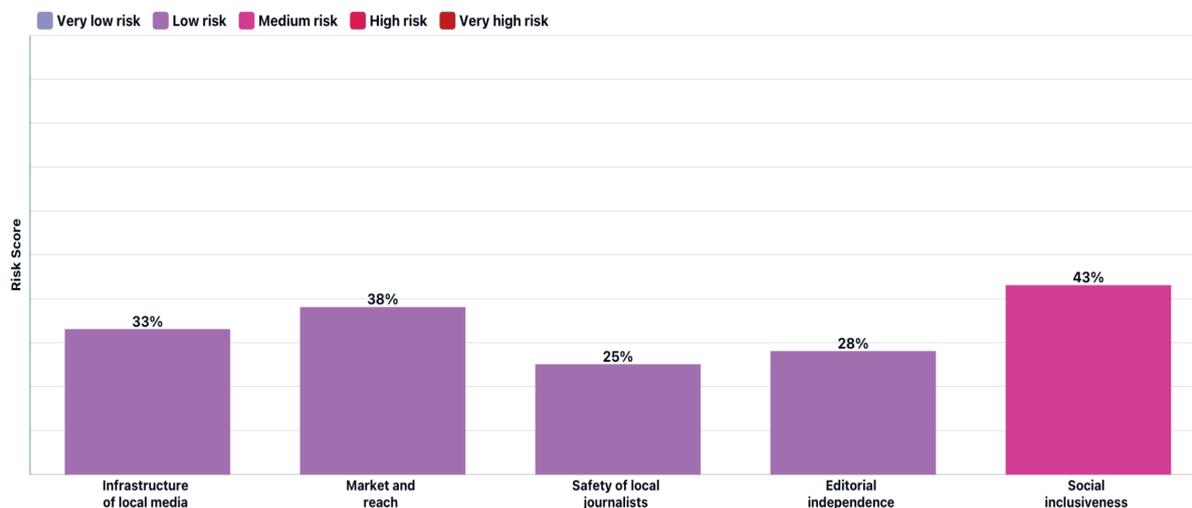
Olivier Standaert, Observatory for Research on Media and Journalism (ORM - UCLouvain)

Context

In Belgium, there is no regular debate on the question of news deserts, but instead discussions and debates exist on the viability of news organisations (revenue and business models), the diversity and quality of news, the way young people consume news and their news diet. The accessibility of news is discussed with regards to the progressive disappearance of physical points of sales and the decline in sales of print journals, however, high internet penetration compensates for this trend. Regarding the local news media, which are by definition close to their audience, it can be argued that some regions/provinces, especially in the south of the country (Luxemburg) do not benefit from the same offer in terms of numbers of news outlets and coverage by journalists, in particular because they are less densely populated or less accessible and further from the political, cultural and economic epicentres.

There is no legal definition of local and community media, except a legal framework for the local television stations in the French and Flemish communities (respectively, 12 and 10 channels). Both of them provide a broad definition framework for the local television (and radio) stations that cover their territory, in cases when, for example these stations are subsidised by public money and fall under the category of (partly) public service media. This framework defines the coverage area, the main missions, the funding rules, etc. In practice, other local news media, that is private media, are basically defined according to two criteria: their anchorage in a defined part of the national territory (geography) and its targeted population (audience).

Risk Score by Indicator – BELGIUM



Granularity of infrastructure of local media - Low risk (33%)

The typical/most common media formats for local media in Belgium are local radio stations, local television stations, newspapers and some online only outlets. Local radio stations are numerous in Belgium, be they stand-alone small stations or bigger ones, attached to a major player (PSM for instance) or not. The Flemish Media Regulator lists 231 local radio stations or local branches of national ones. In French-speaking Belgium, there are currently 60 web radio outlets and 85 independent radio stations, PSM (RTBF) local networks and 10 radio outlets organised in a network. They offer a fine coverage of the territory, and although not all these stations have journalists or news programmes (due to the smallness of their structure), they nevertheless create social links on a local, or even hyper-local scale.¹

Local television stations cover the whole territory according to a geographical distribution plan defined by the public authorities². There are 12 local television stations for Brussels and Wallonia, and 10 Flemish stations covering Flanders and Brussels as well. The print sector, despite a global decline in the number of local editions/titles, remains a non-substitutable player due to the high number of journalists and freelancers who cover communities in rural areas. *L'Avenir* and *Sudinfo* each have many local editions in Wallonia, and Flanders localities are covered by different Flemish titles such as *Het Belang Van Limburg*, *Gazet van Antwerpen* and local editions of big titles such as *Het Laatste Nieuws* (the country's best-selling newspaper) and *Het Nieuwsblad*. Rural communities are sometimes less served and covered than urban communities and if the budget is cut, it is feared that outlying areas and rural communities will be more likely to lose their local correspondents because their economic weight is smaller. It is quite clear that there are no local media for each of the suburban areas, but as a general rule they are covered by the local or national media, when current events require it or depending on editorial lines. There are also hyperlocal media, sometimes run on a voluntary basis or by semi-professionals, notably via Facebook or other social media pages. The two main public service media (VRT and RTBF) do not neglect the challenges of local information and their local missions: a number of investments in studios and/or buildings; and the number of journalists dedicated to local coverage is fairly stable, although it can vary from one region to another. *Belga* is the main news agency in Belgium, relying on some 80 permanent journalists working in the two main national languages, as well as on around 50 (local) correspondents.

The map you can find at the [following link](#) refers to the local and regional radio coverage in Belgium. The data for this visualisation was obtained from [Conseil Supérieur de L'Audiovisuel \(2022\)](#) and [Vlaamse Regulator voor de Media - Lijst van de particuliere lokale Radio's](#).

Market and reach - Low risk (38%)

Although interest in local information is strong in Belgium, this does not always translate into purchases or subscriptions to local news media, particularly because free content is substantial. The Belgian market is characterised by relative stability (few new media, few closures these last five years) but there is no guarantee that the (near) future will be that stable. Between 2018 and 2022, this research registered very few closures in the daily press, radio and TV stations. The free newspaper *Metro* was closed in 2023, after 20 years of publication. The local title *De Nieuwe Gazet* (local to Antwerp) was closed in 2022. In a longer view (1990-2020), the Belgian landscape of daily newspapers has faced a number of closures, but the current number of titles remains stable. Finally, even if many weeklies and monthlies do not fit the definition of local news media, it is worth noting that this sector has probably been the most affected by closures these last ten years.

1 Le secteur de la radio en Fédération Wallonie-Bruxelles, Conseil supérieur de l'audiovisuel, 2023, <https://www.csa.be/radio/>; Rapport over de mediaconcentratie in Vlaanderen., Vlaamse Regulator voor de media, 2023, https://www.vlaamseregulatormedia.be/sites/default/files/pdfversions/rapport_mediaconcentratie_in_vlaanderen_2023.pdf; Lijst Van De Particuliere Lokale Radio's, Vlaamse Regulator voor de Media, 2023, <https://www.vlaamseregulatormedia.be/nl/radio-tv-en-netwerken/radio/particuliere-radio-omroeporganisaties-lokale-radio-omroeporganisaties>; T. Evans and K. Raeymaeckers Profes, Media Landscapes: Belgium, 2019, <https://medialandscapes.org/country/belgium/>; M. Libert et al., Le portrait des journalistes belges en 2023, 2023, https://lapij.ulb.ac.be/wp-content/uploads/2023/06/Journalistiek_BW_FR_digitaal_metCover.pdf; S. Van Leuven et al., Le portrait des journalistes belges en 2018, 2018, https://www.ajp.be/telechargements/profil-des-journalistes/2018_etude.pdf; O. Standaert, Le journalisme flexible. Insertion professionnelle et marché du travail des jeunes journalistes de Belgique francophone, 2016, <https://www.peterlang.com/document/1113799>.

2 <https://www.mediasdeproximite.be/le-reseau-des-medias-de-proximite/>

Local daily newspapers belong to four publishers (*DPG, Mediahuis, Rossel, IPM*), each of them facing common challenges in different organisational contexts. The same is true for other actors (PSM, local radio and television). However, where available, analyses show a decline in the number of employees, all categories taken together, not especially and not only journalists. Sales figures show contrasted views, with the main challenge consisting in securing and amplifying the digital shift of subscribers.³ The Flemish market is nonetheless bigger and more robust than the French-speaking one, which also suffers from a greater penetration of French news media.

Regarding the distribution chain, the number of physical points of sale has decreased dramatically; it is a problem for the print press, whether newspapers or magazines, although their digital shift is making progress.⁴ The phenomenon is the same everywhere in Belgium, but more pronounced in small localities and towns where there are fewer shops and points of sale.

As for financial support provided by the government, there is regular and crucial support of public bodies for local television stations, and, to a (much) lesser extent, for private actors. Print press, including local newspapers also receive some subsidies (depending on many variables) and the “national” PSM (VRT, RTBF and BRF), largely subsidised, are also strongly engaged in local coverage. The Federal authorities help the press (daily or otherwise) with a 0% VAT rule. They also subsidise *bPost*, the Belgian operator for postal services, for the distribution of newspapers and magazines to subscribers (but this mechanism will progressively disappear from July 2023 onwards and will be replaced by an alternative system until 2026).⁵ At the time of finalising this report, this issue, which has been the source of much tension between the parties involved, is still likely to evolve in various directions. Next, most of the financial support depends on the Communities. The French Community operates with direct aid in the form of various types of subsidies. The total amount in 2021 was 11 million euro for the daily press. In the case of the 12 local public television services covering the French-speaking Community, it can be stated that the financial support increased in 2021 (15.4 million euro), after having been stable between 2018 and 2020 (13 million each year). The same kind of stability is to be noted for the Flemish local television services. Under the terms of the agreement, the support amounts to 185,100 euro per broadcaster per year. Flemish local television broadcasters also receive an outreach fee from the service distributors *Proximus, Telenet, Orange* and *Nethys*.⁶ In Flanders, support for the press operated via co-financing between the Flemish Community and “Mediacademie Journalistiek”, but this was suspended in 2020 by the minister responsible for the media (Cools, 2022). In 2021, the Flemish government released 35 million euro for a post-pandemic media recovery plan (until 2024). Finally, the German-speaking Community is providing direct aid to the German-language daily *Grenz Echo*, the only daily newspaper in this language.⁷

Data from empirical cases analysed show a relative stability in the eligibility criteria and the amount of financial support. But the amount of money provided (fixed in most cases) depends on the number of news outlets applying for funding, and the latter might vary from one year to another. 2024 will be a crucial electoral year in Belgium, with elections at all possible levels of government. The new majorities that will be formed to govern the various entities might modify these systems of direct and indirect financial support for the news media.

3 B. Cools, *Presse quotidienne belge : passé, présent et futur*, 2022, <https://www.crisp.be/librairie/catalogue/2097-presse-quotidienne-belge-passe-present-et-futur-9782870753002.html>; Vlaamse regulator voor de media, *Rapport Mediaconcentratie in Vlaanderen 2023*, 2023, <https://www.vlaamseregulatormedia.be/nl/mediaconcentratie>.

4 O. Standaert, S. Mertens, L. d'Haenens and B. Grevisse, *Analyse stratégique de la situation actuelle et de l'avenir des diffuseurs de presse indépendants*, 2019, p. 63, <https://economie.fgov.be/fr/publications/analyse-strategique-de-la>.

5 *Le Soir*, *Distribution des journaux : un accord a été trouvé, la concession abandonnée*, 2023, <https://www.lesoir.be/555050/article/2023-12-12/distribution-des-journaux-un-accord-ete-trouve-la-concession-abandonnee>.

6 Vlaanderen Departement Cultuur, Jeugd & Media, 2023, <https://www.vlaanderen.be/cjm/nl/media/subsidies/regionale-televisieomroepen>.

7 B. Cools, *Presse quotidienne belge : passé, présent et futur économiques*, 2022, <https://www.crisp.be/librairie/catalogue/2097-presse-quotidienne-belge-passe-present-et-futur-9782870753002.html>; Le service général de l'Audiovisuel et des Médias (SGAM) en Fédération Wallonie-Bruxelles, *Subventions accordées aux Télévisions locales*, 2023, <https://statistiques.cfwb.be/culture/audiovisuel-et-medias/subventions-accordees-aux-televisions-locales>; P. Ballon and H. Van den Bulck, *Doorlichting van het Vlaams audiovisueel beleid 2021*, 2021, Universiteit Antwerpen, <https://publicaties.vlaanderen.be/view-file/50765>.

The Belgian advertising market was stable in 2022. Advertisers invested around 1.2 billion euro. While some growth was expected, the war in Ukraine and its impact on the economy appears to have had a dampening effect on advertisers. Digital now accounts for over 35% of the market but remains less profitable than offline investment and the GAFAM take a large part of the global investment on the web. Local news media face different situations depending on their status: newspapers are part of larger groups, others (public local televisions) are sometimes contractually limited in their investments in advertising because they benefit from public subsidies. Some of the record talks show that commercial advertisement revenue for local media outlets remain under constant pressure and that digital ads are hard to make profitable. Many private media therefore invest more in the growth in their subscriber basis.⁸

Regarding ownership concentration, the situation depends on the type of media considered. There are still two (local) newspaper publishers in Flanders (DPG and *Mediahuis*) and the same number in the French-speaking Community (*Rosel* and IPM); this is the result of a slow evolution towards a duopoly market in each of the two language communities. The situation is more contrasted for radio and television, where there are more public or semi-public players. The magazine market, which publishes few local titles, is the most diversified sector in terms of ownership concentration.

As for the willingness to pay, the daily press faces a significant gap between the number of users as measured by audience figures and the volume of sales. So, the tricky question of willingness to pay remains a hot topic and a source of concern for publishers.⁹ The Reuters Institute for the Study of Journalism stated in 2023 that, “clearly, relying on higher subscription revenues alone is not enough, and might not be in the future, as according to this year’s Digital News Report data, paying for news is declining slightly – with 16% of Flemish and 14% of Walloon news users paying for news in the last year, down from 18% in both regions in 2022”. The same source, in its 2022 report, claimed that 62% of Belgian respondents are interested in local news (about a city, a region, etc.), which is the highest percentage of all the 18 categories (international, sports, politics, coronavirus, etc.).¹⁰ All in all, the total paid audience of French-speaking local newspapers (offline and online) is in decline in 2022, after a “bump” due to the pandemic. In Flanders, the trends are also negative for local newspapers (comparison 2022-2023).¹¹

Safety of local journalists - Low risk (25%)

The working conditions of journalists in Belgium are well documented¹². Local news media do not represent a particular (nor homogeneous) market in this regard. Journalists working as freelancers generally work without the same contractual guarantees and protections as their colleagues with an employee contract. This situation differs partly from one organisation to another.

Regarding remuneration, some local media, among others in the daily press, pay their staff below the average of other players in the market, and potentially with average salaries below the national average in the journalism market. In 2022, an employed journalist earned just over a third (36.9%) more than a freelance

8 United Brands Association (UBA), Le benchmark média UBA-UMA révèle à nouveau les dépenses média nettes en Belgique, 2023, <https://www.ubabelgium.be/fr/news-resources/item/2023/03/14/Le-benchmark-média-UBA-UMA-révèle-à-nouveau-les-dépenses-média-nettes-en-Belgique>; B. Cools, Presse quotidienne belge : passé, présent et futur, 2022, <https://www.crisp.be/librairie/catalogue/2097-presse-quotidienne-belge-passe-present-et-futur-9782870753002.html>; Media Marketing, Comment va le marché publicitaire belge ? Ça dépend..., 2023, <https://www.mm.be/news-fr-69032-intelligence-seen-from-space-comment-va-le-marche-publicitaire-belge-ca-depend>; L'Echo , J-F Sacré, Le digital pèse 35% du marché publicitaire mais la télé reste leader, 2023, <https://www.lecho.be/entreprises/media-marketing/le-digital-pese-35-du-marche-publicitaire-mais-la-tele-reste-leader/10454356.html>.

9 B. Cools, Presse quotidienne belge : passé, présent et futur, 2022, <https://www.crisp.be/librairie/catalogue/2097-presse-quotidienne-belge-passe-present-et-futur-9782870753002.html>.

10 I. Picone, Digital News Report 2023: Belgium, Reuters Institute for the study of Journalism, 2023, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2023/belgium>; B. Cools, Presse quotidienne belge : passé, présent et futur, 2023, <https://www.crisp.be/2023/04/presse-quotidienne-belge-passe-present-et-futur/>.

11 CIM, Etude audience presse du CIM, 2023, <https://www.cim.be/fr/presse?date=2023-March&universe=National&title=gaz&page=1>; Digital News Report, 2023; Le Soir, P. Laloux, 2022, <https://www.lesoir.be/470818/article/2022-10-12/le-belge-lit-moins-de-journaux-sauf-le-soir>; Médias de proximité, Idem, 2021, <https://www.mediasdeproximite.be/nos-audiences/>.

12 See national surveys from UGent and ULB in 2013, 2018 and 2023 UGent-ULB, Le journaliste belge en 2013. Un autoportrait, 2013. https://lapij.ulb.ac.be/wp-content/uploads/2019/04/Enquete_journalistes_2013_FR.pdf; S. Van Leuven et al., Portrait des journalistes belges en 2018, https://www.ajp.be/telechargements/profil-des-journalistes/2018_etude.pdf; M. Libert et al., Portrait des journalistes belges en 2023, <https://lapij.ulb.ac.be/lenquete-portrait-des-journalistes-belges-en-2023-est-en-ligne/>

journalist.¹³ Freelancers are not entitled to labour and/or social security protection, such as unemployment or pension schemes: they must contribute to these protections by themselves. The tax regime for self-employed workers, which, in particular, allows them to invoice authors' rights, was recently amended by the competent minister. This threatens and penalises self-employed journalists who invoice using this system.

There is a legal framework in place to guarantee the prosecution of perpetrators of crimes against journalists: the effectiveness of this framework is to be discussed, since the cases treated by the PFS Justice can be very different. The number of physical attacks remains low and the pandemic was a particular time of higher social tensions; online harassment, intimidation or attacks happen more frequently and not all of them are reported. An important question is how journalists are supported and protected by their employer when such attacks happen.¹⁴

Local journalists may be subject to specific pressures or influence due to their geographical proximity and relationships with some of their sources. Those pressures are most often small remarks, warnings and comments, not more, and media professionals can deal with them, but it happens, and journalists must have this in mind. Because of the evolution of some local news media, which were seen/perceived, in the past (last third of the 20th century), as "sociocultural" actors dedicated to supporting local life in its various dimensions, journalists were not systematically seen as independent and expected to hold politicians (and other actors) accountable. There is an evolution towards more liberty in this regard.¹⁵

SLAPP cases occur rarely but there is no anti-SLAPP legal framework in place in Belgium. Although the real dimension of this phenomenon within the EU is unknown, a 2022 report by the *Article 19* organisation found an increasing number of SLAPP cases targeting journalists, non-governmental organisations (NGOs) and activists, and highlighted that none of the countries analysed (including Belgium) had specific domestic legislation on SLAPPs. The European anti-SLAPP directive applies to SLAPPs that have cross-border implications with at least one EU country involved, but EU member states should still pass their own anti-SLAPP laws to address purely domestic cases.¹⁶

Editorial independence - Low risk (28%)

In terms of legal limitations to direct and indirect ownership control, audio-visual media are more regulated than other legacy media such as newspapers and magazines.¹⁷ This requirement of independence from the political sector is also extended to professional associations and trade organisations, for instance regarding the local TV stations that cover Flemish territory. The legal text regarding the French-speaking community globally goes in the same direction and defends the independence of the audio-visual sector in the same way. Radio and television outlets have long been a state monopoly and the state has established a legal framework, while newspapers and magazines were mainly controlled by private actors.¹⁸

13 M. Libert et al., Portrait des journalistes belges en 2023, <https://lapij.ulb.ac.be/enquete-portrait-des-journalistes-belges-en-2023-est-en-ligne/>

14 MFRR, Mapping Media Freedom | Monitoring Report, 2022, 2022, <https://www.mappingmediafreedom.org/wp-content/uploads/2023/02/MFRR-Monitoring-Report-2022.pdf>; Conseil de L'Europe, Rapport annuel des organisations partenaires de la Plateforme du Conseil de l'Europe pour renforcer la protection du journalisme et la sécurité des journalistes, 2020, <https://rm.coe.int/rapport-annuel-final-fr/16809f03aa>.

15 J. Furnémont, Les Médias De Proximité, 2023: <https://regulation.be/2023/06/28/les-medias-de-proximite-des-medias-qui-sadapent-evoluent-innovent-echangent-mutualisent-au-benefice-des-citoyens-de-la-federation-wallonie-bruxelles>; C. Glesner, TV Lux mis sous pression par les élus communaux à travers la Sofilux, 2021, <https://www.sudinfo.be/art/884141/article/2021-12-16/tv-lux-mis-sous-pression-par-les-elus-communaux-travers-la-sofilux>.

16 Article 19, SLAPPs against journalists across Europe, 2022, <https://www.article19.org/wp-content/uploads/2022/03/A19-SLAPPs-against-journalists-across-Europe-Regional-Report.pdf>; European Parliament, Strategic lawsuits against public participation (SLAPPs), 2022, [https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/733668/EPRS_BRI\(2022\)733668_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/733668/EPRS_BRI(2022)733668_EN.pdf); E. Behrens, Center for data innovation, The European Commission's Anti-SLAPP Directive is a Step in the Right Direction, But Member States Need to Pass Anti-SLAPP Laws Too, 2023, <https://datainnovation.org/2023/02/the-european-commissions-anti-slapp-directive-is-a-step-in-the-right-direction-but-member-states-need-to-pass-anti-slapp-laws-too/#:~:text=The>.

17 For instance, the main guidelines of the Flemish legal text regulating the audio-visual sector state that "Linear radio broadcasters must be independent of any political party" (art. 130). The same is said of linear television broadcasters, and further, of non-linear players (art. 174). <https://www.vlaamseregulatormedia.be/nl/radio-tv-netwerken>

18 F. Jongen and A. Strowel, Droit des médias et de la communication, 2017, <https://www.larcier-intersentia.com/fr/droit-medias-communication-9782804461171.html#product.info.tab.details>; Communauté française de Belgique, Décret relatif aux services de médias audiovisuels et aux services de partage de vidéos, 2021, <https://www.csa.be/document/decree-relatif-aux-services-de-medias-audiovisuels-et-aux-services-de-partage-de-vidéos>; Vlaamse Gemeenschap, Décret Betreffende Radio-omroep En Televisie, 2009, https://www.vlaamseregulatormedia.be/sites/default/files/mediadecreeet_27_maart_2009_26_versie_01122022.pdf; H. Messoudi, IPM rachète l'Avenir à Nethys, 2020, <https://www.rtf.be/article/ipm-rachete-l-avenir-et-moustique-a-nethys-les-syndicats-sont-inquiets-10539771>; RSF, Reporters Sans Frontières - Belgique, 2023, <https://rsf.org/fr/pays/belgique>.

Criteria for state subsidies are defined, and direct and indirect subsidies are distributed to all the news media both in a fair and transparent manner. Types of subsidies and criteria for distribution can be consulted online, with no source indicating that these criteria are applied unfairly. In Flanders, some local media also get funding from their municipality (3,2% of the 251 that have been listed by the Flemish Media Regulator).¹⁹

Legal texts say nearly nothing about the criteria of distribution of state advertising, or their fairness. Confidential data shows that there are no precise rules regarding state advertising.²⁰ Moreover, the amounts and their breakdown lack transparency and consideration.

On paper, Belgium benefits from a variety of guarantees to preserve the independence of the press, from both political and commercial influences.²¹ Experts in the field have pointed out however, that these “paper guarantees” do not always unequivocally apply in practice.

In terms of commercial influence over editorial content, the private media in Belgium (*DPG, Roularta, Rossel, Mediahuis, Roularta, MediaNation* and IPM) belong to family shareholdings, which raises the question of commercial influences in other terms. Gathering tangible evidence on this subject remains difficult. It is not impossible that certain pressures are exerted from time to time, and it is true that some confusion or “mixing of genres” are possible between sponsored content and editorial content, which is sometimes written by the same people, while needing to be clearly differentiated (which is generally the case). It has to be acknowledged that situations where media groups promote their own products happen frequently. At the same time, local news media are able to protect themselves from external commercial entities.

There is general constitutional protection of freedom of expression and press freedoms, and self-regulatory codes of ethics for journalists. The Belgian survey of the Worlds of Journalism Study states that 67% of the respondents say that they have complete or a great deal of freedom in their selection of stories. The pressure exerted by politicians and government officials is amongst the lowest in the list of perceived influences.²² In Belgium, the journalistic culture, the normative conceptions and concrete practices, foster resilience against potential pressure.

This remit of the media authority concerns, in variable degrees, the public media and the audio-visual market, and local radio/TV stations are included. Laws and principles that apply to the national PSM also apply to local branches, and no data was found suggesting that there is a particular vulnerability in this respect.

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- 19 Vlaamse regulator voor de media, Mediaconcentratie in Vlaanderen, 2023, <https://www.vlaamseregulatormedia.be/nl/nieuws/2023/medi-aconcentratierapport-2023-gepubliceerd>; Vlaamse Gemeenschap, Subsidies voor de audiovisuele sector, 2023, <https://www.vlaanderen.be/subsidies-voor-de-audiovisuele-sector>; Vlaamse Gemeenschap, Subsidie voor bijzondere journalistiek, 2023, <https://www.vlaanderen.be/subsidie-voor-bijzondere-journalistiek>; Communauté française de Belgique, Aides aux médias, 2023, <https://audiovisuel.cfwb.be/aides/aide-medias/>; Communauté française de Belgique, Décret relatif aux aides attribuées à la presse quotidienne écrite francophone, 2004, https://www.galillex.cfwb.be/document/pdf/28687_003.pdf; J. Sacré, LN24 sollicite un prêt auprès de la Fédération Wallonie-Bruxelles, 2023, <https://www.lecho.be/entreprises/media-marketing/ln24-sollicite-un-pret-aupres-de-la-federation-wallonie-bruxelles/10493714.html>.
- 20 F. Jongen and A. Stowel, Règlements de la publicité, in Droit des médias et de la communication, 2017, https://www.larcier-intersentia.com/fr/droit-medias-communication-9782804461171.html?utm_source=google&utm_medium=paid&utm_campaign=FR_Search_DSA&utm_id=19789595402&utm_term=&utm_content=Search_DSA_Books&gclid=EAlaIqobChMI7oT79cDpggMVLrZoCR2BDaEYEAAYASAAE.
- 21 There are many institutions and structures able to monitor these issues and to deal with them, both inside the news media (societies of journalists, internal structures) and outside: Conseil Supérieur de l’Audiovisuel, Vlaamse Regulator voor de Media, Professional Unions such as VVJ and AJP, and media councils (Raad voor de journalistiek / Conseil de déontologie Journalistique).
- 22 I. Lambrecht and P. Valcke, Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report: Belgium, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, <https://cmpf.eui.eu/mpm2022-results/>; O. Standaert and S. Mertens, Country report from the Worlds of Journalism Study: Journalists in Belgium, 2016, https://epub.ub.uni-muenchen.de/29698/1/Standard_Mertens_Country_report_Belgium.pdf; P.Valcke, P. Ombelet and I. Lambrecht, Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2015. Country report: Belgium, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2016, https://cmpf.eui.eu/media-pluralism-monitor/mpm-2016-results/belgium/#_ftnref9; J. De Keyser, Journalistieke autonomie in Vlaanderen: onderzoeksrapport in opdracht van het Kabinet van de Vlaamse minister van innovatie, overheidsinvesteringen, media en armoedebestrijding, 2012, <https://biblio.ugent.be/publication/3039856/file/3039872.pdf>.

Social inclusiveness - Medium risk (43%)

Regarding the representation of minorities in local news content, there is a lack of diversity in both the north and south of the country. It would be especially important to be able to study these representations exhaustively, for all the media, which is not currently possible. There is very little data on the content of local media, so it is difficult to establish to what extent they differ from other media, but it is most likely that their proximity enables them to make visible and give voice to people and actors that are almost never seen in media with a wider geographical scope. A recent study from the Audio-visual Council highlights the lack of visibility of people from diverse backgrounds in the various audio-visual programmes. This representation only increased by 1% between 2011 and 2021, and even showed a downward trend between 2017 and 2021. The report also notes that the area in which diversity is most present is that of organised crime, terrorism and justice. In terms of media roles (such as experts, scholars, economic or cultural leaders, people with political responsibilities) the more prestigious these roles are, the less people perceived as foreign are represented.²³

Beside the issue of the quality of the coverage, is the quantity, which could also be a matter of concern. In the last Barometer of the *Conseil Supérieur de l'Audiovisuel* (which includes PSM), 11.31% of all speakers observed in programmes were perceived to be from a diverse background. This has affected the majority of programmes over the last 10 years, with some significant drops (-17.78% in drama and -10.35% in entertainment, etc.). In Flanders, a scientific study pointed out that the ethnic diversity of actors and sources was not sufficient in any of the news brands under study. Ethnic minorities are often portrayed in traditional roles and contexts such as that of a politician or a criminal in news stories about national politics and law. The PSM newscast showed more ethnic minorities both as actor and as source than the commercial news broadcaster (VTM).^{24 25}

There are some private media offering contents for some minorities, there are also some news outlets whose editorial line and contents are focused on one community (*Arabel*, a radio station for the Muslim community, with some programs in Arabic, or Radio Judaïca for the Jewish community).²⁶ There is no regular news or programmes in minority languages in Belgian PSM.

There are programmes or newspaper sections aimed specifically at certain categories of audience. As an example, RTBF and VRT are gradually increasing their broadcasting time for disabled sports and women's competitions. It is much more difficult to find entire news outlets addressing marginalised groups in the country. A number of programmes are translated into sign language (for the hearing-impaired), sometimes simultaneously with the live broadcast.²⁷

23 H. Vandenberghe, L. d'Haenens and B. Van Gorp, Demografische diversiteit in het Vlaamse perslandschap, 2015, <https://www.aup-online.com/content/journals/10.5117/2015.043.002.169>; CSA, Dix ans du baromètre du Csa : Un peu plus de femmes, une diversité qui stagne ou régresse dans les médias, 2023, <https://www.csa.be/117734/10-ans-du-barometre-du-csa-un-peu-plus-de-femmes-une-diversite-qui-stagne-ou-regresse-dans-les-medias/>.

24 H. Vandenberghe, L. d'Haenens and B. Van Gorp, Diversiteit in de Vlaamse nieuwsmedia: een longitudinale en mediavergelijkende kijk., 2017, <https://researchportal.be/nl/publicatie/diversiteit-de-vlaamse-nieuwsmedia-eeen-longitudinale-en-mediavergelijkende-kijk>; CSA, Baromètre diversité dans les médias, 2021, <https://www.csa.be/egalitediversite/barometre-2021-accueil/barometre-2021-lorigine-en-bref/>; F. Saeys, M. Lits, I. Devroe, J. Desterbecq and D. Grammens, Association des journalistes Professionnels, La Représentation Des Minorités Ethniques Dans Les Médias Belges, 2007, <https://www.ajp.be/telechargements/Rapportfinalfr3001.pdf>.

25 H. Vandenberghe, L. d'Haenens and B. Van Gorp, Diversiteit in de Vlaamse nieuwsmedia: een longitudinale en mediavergelijkende kijk., 2017, <https://researchportal.be/nl/publicatie/diversiteit-de-vlaamse-nieuwsmedia-eeen-longitudinale-en-mediavergelijkende-kijk>; CSA, 10 Ans Du Baromètre Du Csa : Un Peu Plus De Femmes, Une Diversité Qui Stagne Ou Régresse Dans Les Médias, 2023, <https://www.csa.be/117734/10-ans-du-barometre-du-csa-un-peu-plus-de-femmes-une-diversite-qui-stagne-ou-regresse-dans-les-medias/>.

26 Radio Judaica, Landing page, <https://radiojudaica.be/>; Arabel, Landing page, <https://www.arabel.fm/>; The Brussels Times, Landing page, <https://www.brusselstimes.com/>.

27 VRT, Extra aandacht vrouwencompetities bij VRT zorgde deze zomer voor groot bereik en hoge waardering, 2022, <https://www.vrt.be/nl/over-de-vrt/nieuws/2022/11/03/extra-aandacht-vrouwencompetities-bij-vrt-zorgde-deze-zomer-voor/>; F. Collin, Le sport féminin est l'un des nouveaux piliers de la RTBF, 2023, <https://www.rtf.be/article/le-sport-feminin-est-l-un-des-nouveaux-piliers-de-la-rtbf-11141422>.

Best practices and open public sphere

Some media are currently experimenting with innovative responses to improve reach and audience, proposing new forms of work, journalistic products or services, and committing resources to it. Despite a willingness to address these issues, and some very promising initiatives, local news media that implement them in both an intra-organisational and strategic way remain rare. These initiatives and innovations for better links, more trust, more proximity, and dialogue exist, but they are rarely integrated in the core of the organisational structure of local news outlets. The most striking examples of this have been summarised in the LINC research project, which shows how local media are creating initiatives, using digital or physical devices, to renew and improve their links with their audiences: the LINC research project shows four modalities for engaging with audiences, going from the most passive to the most active: listening, dialoguing with its audiences, involving its audiences and finally, co-constructing content and sharing it with subscribers/audiences.²⁸

There are some innovative initiatives, in Flanders, to improve reach and audience, proposing new forms of work, journalistic products or services (subsidised by public funding).²⁹ Citizens' initiatives emerge from time to time, but they are rarely permanent or structured. These initiatives echo the definition of hyperlocal media: "geographically based, community oriented, original news reporting operations, indigenous to the web and intended to fill perceived news gaps in coverage of an issue or region and to promote civic engagement."³⁰ As stated previously, municipalities and some cultural or social associations sometimes launch initiatives to inform and create debates around their fields of interests. These media can fit with the definition of hyper-local news outlets and citizen initiatives because they employ many volunteers and citizens who devote a part of their time to produce content. The Flemish Media Regulator notes that almost every municipality also publishes its own news media. Certain non-profit associations also launch their (web) media. In these cases (non-profit associations or municipality initiatives), there are more means and resources than something created "from scratch" by a group of citizens. The comparability of these initiatives must be carefully examined and not all of them have the same impact, the same resources and the same goals.³¹

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- 28 N. Pignard-Cheynel, L. Amigo et al., LINC Research project, 2020, <https://www.unine.ch/ajm/linc#cid30c1bf9d-9675-4a67-8d25-a1f32491503b>; N. Pignard-Cheynel, and L. Amigo, (Re)connecting with audiences. An overview of audience-inclusion initiatives in European French-speaking local news media, 2023, <https://journals.sagepub.com/doi/10.1177/14648849231173299>; O. Standaert, N. Pignard-Cheynel and L. Amigo, European French-Speaking Local Media's Relationship with Audiences. A Strategic Challenge between Diluted and Integrated Organizational Modalities, 2023, <https://www.tandfonline.com/doi/full/10.1080/21670811.2023.2234410>; B. Dalle, Flemish Minister for the media, Bijna 12 miljoen euro voor digitale transformatie van de Vlaamse mediasector, 2022, <https://www.benjamindalle.be/post/bijna-12-miljoen-euro-voor-digitale-transformatie-van-de-vlaamse-mediasector>.
- 29 B. Dalle, Flemish Minister for the media, Bijna 12 miljoen euro voor digitale transformatie van de Vlaamse mediasector, 2022, <https://www.benjamindalle.be/post/bijna-12-miljoen-euro-voor-digitale-transformatie-van-de-vlaamse-mediasector>.
- 30 J. De Meulenaere, C. Courtois and K. Ponnet, Bottom-up hyperlocal media in Belgium: Facebook-groups as collaborative neighbourhood awareness systems, In A. Gulyas & D. Baines (Eds.), *The Routledge companion to local media and journalism*, 2020, pp. 398–407, <https://biblio.ugent.be/publication/8625438>.
- 31 Régulation, De Radio Pirate À Webtv, 2021, <https://regulation.be/2021/03/10/de-radio-pirate-a-webtv/>; Régulation, Zam Tv, Une Vision Libre De La Diversité, 2019, <https://regulation.be/2019/03/04/zam-tv-une-vision-libre-de-la-diversite/>; Régulation, Une Webtv Se Bat Pour Le Droit D'informer, 2021, <https://regulation.be/2021/04/09/une-webtv-se-bat-pour-le-droit-dinformer/>; J. De Meulenaere, C. Courtois and K. Ponnet, Bottom-up hyperlocal media in Belgium: Facebook-groups as collaborative neighborhood awareness systems, 2020, <https://biblio.ugent.be/publication/8625438>.



Bulgaria

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Context

The term “news deserts” is not in use in public debate on the state of the media in Bulgaria. Nonetheless, problematic developments in the local media sector are frequently discussed, mostly in research carried out by journalistic organisations,¹ by NGOs,² in academic research,³ and sometimes by media industry professionals. However, there is no structured discussion in the country aimed at promoting policy measures to enhance the condition of local and regional media.

Bulgarian legislation does not provide clear definitions for regional, local, and community media. Article 110 of the Radio and Television Act (RTA) stipulates that any radio and television broadcasting licence must state the range of distribution: national, regional, or local.⁴ There are no legal provisions on the licensing or the functioning of community media, which do not exist in practice.

Since the transformation of the media landscape after 1989, the general state of local media in Bulgaria has been largely unsustainable. In the early 1990s, there was a rapid and unregulated development of the private sector and many local media outlets were established. Financial instability, however, has led to market changes (closures, mergers, short-lived projects, etc.), job insecurities and compromises in journalistic standards. In the context of economic and political weaknesses in the country, local and regional medias’ editorial independence has been seriously challenged, with susceptibility to external influences, initially reserved to the traditional media but subsequently expanding into the online sector.

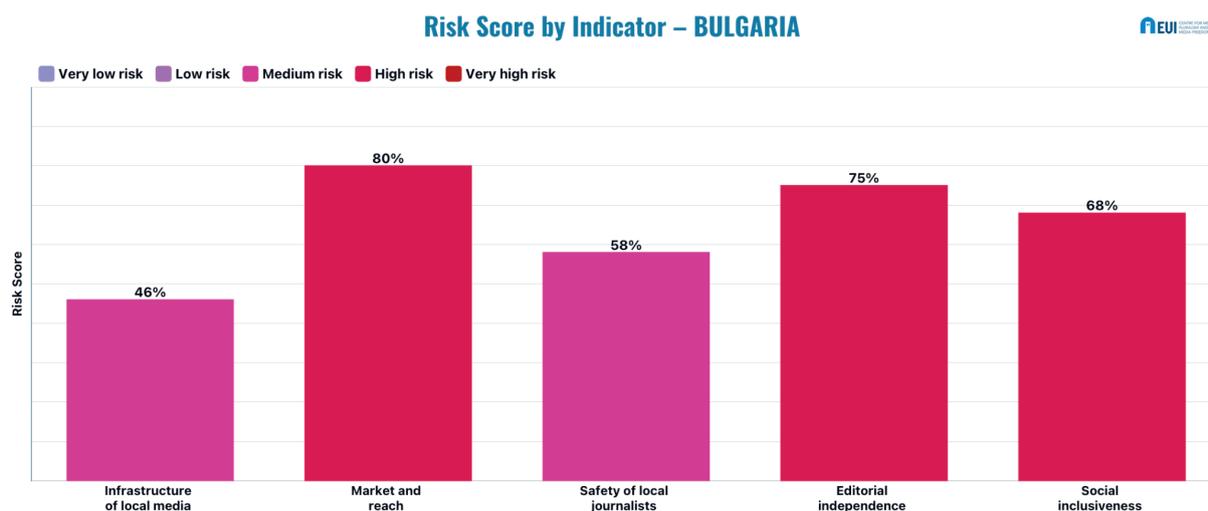
1 I. Valkov, “Media Under Fire. For More Editorial Responsibility. 2022 – Annual Survey of Freedom of Speech in Bulgaria”, Sofia: AEJ – Bulgaria, 2022. https://aej-bulgaria.org/wp-content/uploads/2022/10/Media-under-fire_EN.pdf

2 CSD, “Regional Media in Bulgaria: Limits of Survival”, Policy Brief No. 57, *Center for the Study of Democracy*, 2015, <https://csd.bg/publications/publication/policy-brief-no-57-regional-media-in-bulgaria-the-limits-of-survival/>

3 Л. Симеонова, “Местната и регионална преса в България – между упадъка и надеждите на читателите”, *Медиите на 21 век. Онлайн издание за изследвания, анализи, критика*, 10 април 2023, https://www.newmedia21.eu/izsledvaniq/mestnata-i-regionalna-presa-v-balgariya-mezhdu-upadaka-i-nadezhdite-na-chitatelite/#_edn14

4 Radio and Television Act (promulgated, State Gazette No.138, 24 November 1998), Council for Electronic Media, Council for Electronic Media, Bulgaria, Council for Electronic Media, https://www.cem.bg/files/1684834811_radio_and_television_act.pdf, 1998

The Severoiztochen (Northeastern) region is the area with the lowest number of local and regional media outlets in the country,⁵ and among the regions with lower internet penetration. However, there is no distinct correlation between economically deprived areas⁶ and news deserts.



Granularity of infrastructure of local media – Medium risk (46%)

The evaluation of the infrastructure of local and regional media in Bulgaria points to a medium-risk situation. Most deprived of local news are communities in suburban areas (very high risk); media in these areas existed only exceptionally, over the past thirty years, and in the few known cases they were not sustainable.⁷

Rural areas are the second most problematic (high risk) in terms of access to local news. In the context of a lack of detailed data, Vesela Vatseva of the Bulgarian Association of Regional Media explains: “In Bulgaria, there are very few and rare print media in small towns. Rather, newsletters are printed on the occasion of significant events in the settlement. Also, the so-called *radiotochka* (local cable radio network) are used, through which the local municipality informs the population.”⁸ Journalist Spas Spasov, founder of *Za istinata* online media platform for local and regional journalistic investigations, comments: “In the most common case, rural communities do not have local outlets, they are ‘covered’ by regional/local print media produced in the nearest town. As a result of distribution difficulties, newspapers in villages are often delivered directly by their publishers.”⁹

The local media landscape in urban areas in Bulgaria is very fragmented (medium risk). The presence and diversity of local media is uneven. Existing data indicate that newspapers are the most typical local media, available in all districts and regions. However, the total number of regional newspapers has decreased over the past 5 years: 127 in 2018, 113 in 2019, 111 in 2020, 106 in 2021, and 100 in 2022.¹⁰ Most illustrative is the case of *Varna*, the third largest city in Bulgaria, where there is no longer a local daily fol-

5 Aggregated data on local and regional TV and radio (licences for local or regional range of distribution and polythematic profile) and number of regional newspapers. Sources: CEM, “Public Register: Linear Services: Cable and Satellite Bulgarian”, Council for Electronic Media, Bulgaria, Council for Electronic Media, n.d., https://www.cem.bg/linear_reg.php?cat=1&lang=bg; CEM, “Public Register: Linear Services: Terrestrial Broadcasting”, Council for Electronic Media, Bulgaria, Council for Electronic Media, n.d., https://www.cem.bg/linear_reg.php?cat=2&lang=bg; NSI, “Issued newspapers by statistical regions, districts and type in 2022”, National Statistical Institute, Bulgaria, National Statistical Institute, 27 June 2023, <https://www.nsi.bg/en/content/3598/issued-newspapers-statistical-regions-districts-and-type>

6 Eurostat, “Regional gross domestic product (PPS per inhabitant) by NUTS 2 regions”, Eurostat, European Union, Eurostat, last update 22 February 2023, <https://ec.europa.eu/eurostat/databrowser/view/TGS00005/default/table>

7 Л. Гергова, “Еманципиране на квартала. Вестник за Люлин”, LiterNet, Bulgaria, LiterNet, 8(117), 2 August 2009, https://litenet.bg/publish25/l_gergova/emancipirane.htm; Безплатен вестник Люлин (last update 9 April 2021) Facebook page, <https://www.facebook.com/bezplatenvestnik/>

8 Vesela Vatseva, Executive Director of the Bulgarian Association of Regional Media, 30/06/2023, online interview.

9 Spas Spasov, journalist, *Za istinata*, 19/06/2023, online interview.

10 NSI, “Issued newspapers by statistical regions, districts and type in 2022”, National Statistical Institute, Bulgaria, National Statistical Institute, 27 June 2023, <https://www.nsi.bg/en/content/3598/issued-newspapers-statistical-regions-districts-and-type>

lowing the closure of the *Cherno More* in April 2020.¹¹ In many cases online media outlets provide an alternative to the decline in print media offers. A lack of data, however, hinders the mapping of the online media landscape. At the same time, it is noteworthy that 11.8% of the individuals in the country have never used the internet, with the highest percentage recorded in the Severozapaden (Northwestern) region (16.7%).¹²

Aggregated data on the number of regional newspapers¹³ and local and regional TV and radio programmes with a polythematic profile¹⁴ show that the region with the smallest number of local and regional media is Severoiztochen, with 36, and the district with the smallest number of local and regional media outlets is Razgrad, Severen tsentralen (North central) region, with 4.

In the absence of accurate data, media professionals and experts have observed a downward trend in the number of local journalists.¹⁵ According to Vatsева, “[n]ewsrooms with 15–20 people are now down to 5–10 people.” Against this background, the level of risk is lowest with regard to the public service media (BNT and BNR) and the main news agency (the state-owned BTA), which keep networks of local correspondents across the country.

The map you can find at the [following link](#) refers to the coverage of local and regional media in Bulgaria in 2023. The data for this visualisation was collected by the LM4D Bulgarian Country Team (Orlin Spassov, Nelly Ognyanova, Nikoleta Daskalova).

Market and reach – High risk (80%)

The highest risk for Bulgaria is identified in the market and reach indicator, with an overall risk score of 80%. Most problematic (very high risk) is the situation regarding revenue trends, the declining number of media outlets, and the lack of financial support provided by the government. Amidst the backdrop of a lack of precise data on local media revenues, media experts and professionals have repeatedly pointed to the deterioration of the local media market. The COVID-19 crisis in particular has had a very negative effect, leading to the reduction in volume and frequency of local newspaper publishing and even to the closure of some papers.¹⁶ The Bulgarian research team confirmed the trend of decreasing resources in the local media sector, a shrinking local advertising market, and an unhealthy dependence of the media on local parties and administrations as a source of funds (mainly through advertising contracts and the provision of information services to local authorities).

Print media distribution has been curtailed in recent years. The number of points of sale for newspapers has decreased significantly since the bankruptcy of Lafka in 2020, until then a leading distribution chain of questionable reputation.¹⁷ The distribution of paid TV (the most widespread form of TV consumption) is at

11 Л. Симеонова, “Местната и регионална преса в България – между упадък и надеждите на читателите”, Медиите на 21 век. Онлайн издание за изследвания, анализи, критика, 10 април 2023, https://www.newmedia21.eu/izsledvaniq/mestnata-i-regionalna-presa-v-bulgariya-mezhdu-upadaka-i-nadezhnite-na-chitatelite/#_edn14

12 NSI, “Individuals who have never used the internet”, National Statistical Institute, Bulgaria, National Statistical Institute, 8 December 2023, <https://www.nsi.bg/en/content/2828/individuals-who-have-never-used-internet>

13 NSI, “Issued newspapers by statistical regions, districts and type in 2022”, National Statistical Institute, Bulgaria, National Statistical Institute, 27 June 2023, <https://www.nsi.bg/en/content/3598/issued-newspapers-statistical-regions-districts-and-type>

14 CEM, “Public Register: Linear Services: Cable and Satellite Bulgarian”, Council for Electronic Media, Bulgaria, Council for Electronic Media, n.d., https://www.cem.bg/linear_reg.php?cat=1&lang=bg; CEM, “Public Register: Linear Services: Terrestrial Broadcasting”, Council for Electronic Media, Bulgaria, Council for Electronic Media, n.d., https://www.cem.bg/linear_reg.php?cat=2&lang=bg

15 I. Valkov, “Media Under Fire. For More Editorial Responsibility. 2022 – Annual Survey of Freedom of Speech in Bulgaria”, Sofia: AEJ – Bulgaria, 2022. https://aej-bulgaria.org/wp-content/uploads/2022/10/Media-under-fire_EN.pdf; E. Dimitrova in AEJ, “New Horizons in Journalism Conference 2022 (live)” video, YouTube, 1 December 2022, <https://www.youtube.com/watch?v=nDUVWbJRT8w>

16 В. Антонова, “Пандемията COVID-19 и размерите на медийната криза”, АЕЖ – България, 8 май 2020, https://aej-bulgaria.org/covid_media_crisis/; В. Dzhambazova, “Press Freedom Doesn’t Come Free”, in V. Berger et al (ed.), A Lockdown for Independent Media? Effects of the COVID–19 pandemic on the media landscape and press freedom in Central and Southeast Europe (Friedrich Ebert Stiftung, June 2020), pp. 7–9, <https://library.fes.de/pdf-files/bueros/budapest/16392.pdf>; 24 часа, “И Варна остана без вестник, местните медии умират, кои оцеляха”, 24 часа, 1 февруари 2021, <https://www.24chasa.bg/bulgaria/article/9468362>; И. Везенков, “Трагично”. Как COVID-19 доубива регионалната журналистика в България”, Свободна Европа, 9 април 2020, <https://www.svobodnaevropa.bg/a/30543872.html>

17 Н. Стайков, “От шум на пазара до фалит за три дни. Чия беше Lafka?”, Свободна Европа, 27 февруари 2020, <https://www.svobodnaevropa.bg/a/30457585.html>

the lowest level, but not necessarily declining, in the Severoiztochen region and in villages; in both cases, paid TV is used by 88.9% of households.¹⁸ A subject of particular controversy has been the role of small cable TV and internet providers – which argue that they provide essential services to underserved communities¹⁹ – amidst allegations they operate in the grey market, disrespecting tax and copyright obligations.²⁰ At the same time, their market positions have deteriorated due to the concentration and aggressive pricing offers of the big telecoms.²¹

The state does not provide specific support to local and regional media through subsidies, except for public service media. The provision of state advertising to the media is excluded from the regime introduced for public procurement. This allows the provision of state funds in return for favourable coverage, which has been one of the most serious problems in the local media sector in the past decade. In the presence of severe shortages of commercial advertising revenues,²² financial difficulties, a shortage of human resources and outdated equipment, the majority of local media depend on the municipalities' budgets for media services and on the budgets for publicising the EU projects implemented at the local and regional level.²³

Disaggregated data on audience or market shares in local media sectors and geographical areas are not available. In practice, all districts are served by national media, which dominate the media market as a whole, with a high concentration in the TV and radio sectors.²⁴ The Reuters Digital News Report indicates that the weekly reach (offline) of regional or local newspapers in Bulgaria was 18% in 2019, 16% in 2020, 15% in 2021, 13% in 2022, and 8% in 2023.²⁵

According to The European Media Industry Outlook, the proportion of consumers paying to access news content in Bulgaria in 2022 is 15.3%.²⁶ The Reuters Digital News Report also indicates that a small number of online users in Bulgaria pay for online news content: 7% in 2019, 10% in 2020, 15% in 2021, 12% in 2022, and 11% in 2023.²⁷ The overall low willingness of Bulgarians to pay for news content affects the consumption patterns of local news as well.

Safety of local journalists – Medium risk (58%)

The indicator on the safety of local journalists in Bulgaria points to medium risk (58%), with a high risk identified in the variables on working conditions of employed and freelance journalists. General labour and social security legislation in Bulgaria covers the media sector and regulates minimum rates of pay, open-ended and temporary contracts, termination of contractual relationships, including dismissal proce-

18 БАБТО, "Резултати от национално представително количествено проучване", Браншова Асоциация на Българските Телекомуникационни Оператори, 2020, <http://babto.bg/study>

19 OffNews, "Кабелни оператори: КРС работи за унищожаването на малкия бизнес и по-високи цени за клиентите", OffNews, 20 януари 2020, <https://offnews.bg/medii/kabelni-operatori-krs-raboti-za-unishtozhavaneto-na-malkia-biznes-i-p-719797.html>

20 Ю. Арнаудов, "Лъч светлина в сивия сектор на пазара за платена телевизия в България", Tech Trends, 31 март 2021, <https://www.techtrends.bg/2021/03/31/grey-sector-tv-bulgaria-10069/>

21 Ibid.

22 Information validated by the interlocutors of the Bulgarian research team.

23 Transparency International Bulgaria, "Местна система за почтеност: Индекс 2022", *Transparency International Bulgaria*, 2022, <http://iisi.transparency.bg/years/2022/#>

24 O. Spassov, N. Ognyanova and N. Daskalova. *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia & Turkey in the Year 2022*. Country Report: Bulgaria. Florence: European University Institute, 2023, https://cadmus.eui.eu/bitstream/handle/1814/75716/Bulgaria_results_mpm_2023_cmpf.pdf?sequence=1&isAllowed=y

25 Reuters Institute for the Study of Journalism, "Digital News Report 2023: Bulgaria", *Reuters Institute for the Study of Journalism*, 14 June 2023, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2023/bulgaria>; Reuters Institute for the Study of Journalism, "2022 Digital News Report: Bulgaria", *Reuters Institute for the Study of Journalism*, 15 June 2022, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/bulgaria>; Reuters Institute for the Study of Journalism, "2021 Digital News Report: Bulgaria", *Reuters Institute for the Study of Journalism*, 23 June 2021, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/bulgaria>; N. Newman et al., *Reuters Institute Digital News Report 2020* (Oxford: Reuters Institute for the Study of Journalism, 2020), p. 65, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf Top of Form

26 PPMI, KEA and Oliver & Ohlbaum Associates, quoted in *EC, The European Media Industry Outlook* (Brussels: European Commission, May 2023), p. 90, <https://digital-strategy.ec.europa.eu/en/library/european-media-industry-outlook>

27 Reuters Institute for the Study of Journalism, "Digital News Report 2023: Bulgaria"; Reuters Institute for the Study of Journalism, "2022 Digital News Report: Bulgaria"; Reuters Institute for the Study of Journalism, "2021 Digital News Report: Bulgaria"; N. Newman et al., *Reuters Institute Digital News Report 2020*, p.65.

dures, unemployment benefit systems and maternity or parental leave. Employees of the public BNR and BNT benefit from additional protection as a result of collective labour agreements between the employer and the respective trade unions. For years, however, the private local media sector has been facing poor working conditions, low wages (close to the minimum wage), a lack of trade union protection, delayed or unpaid wages for months and other violations of labour and social security legislation in practice.²⁸ Freelance journalists face serious challenges in their working environment, including self-financing of work trips and buying their own work equipment.²⁹

The Mapping Media Freedom index³⁰ and the Council of Europe's Platform to promote the protection of journalism and safety of journalists³¹ report on five cases of attacks and threats to the physical safety of local journalists in the period 2018–2022, showing a downward trend. Conversely, perpetrators of crimes against journalists are rarely prosecuted; impunity has been a widespread systemic problem, causing distress among journalists.³²

In the past few years, journalists' associations have issued statements of support, including for local journalists, in response to threats, attacks, assault, political, administrative or economic pressure. However, journalists' organisations have limited impact on editorial independence at the local level.

SLAPPs are not yet defined in Bulgarian law. A study on SLAPP cases in Bulgaria has identified 57 cases in the period from 2000 to March 2023. The number of cases against local media and journalists is 15 (26% of all identified cases).³³

Editorial independence – High risk (75%)

In Bulgaria, political parties and party leaders can legally own the media. In the past few years, politicians and family members have had ownership over local and regional media outlets (TV, online, print), often providing positive coverage of the corresponding political subject.

Although there are legal (Article 11 of the RTA) and self-regulatory (Chapter 3 of the Code of Ethics of the Bulgarian Media) provisions for editorial independence, pervasive political and commercial influences over local media editorial content often result in self-censorship among journalists.³⁴ Political actors, including local government institutions, are among the leading sources of external pressure in all local media sectors. In parallel, local media are reluctant to investigate issues that could affect local advertisers or the non-media business interests of their owners.

While in Bulgaria there are no state subsidies distributed to media outlets other than PSM, the distribution of state advertising, including funds for information campaigns under EU programmes, has long been a disturbing issue (very high risk). There are no publicly accessible criteria on the allocation of state advertising. As the 2023 Rule of Law report on Bulgaria outlines, "[t]he lack of a clear framework to ensure transparency in the allocation of state advertising remains a concern despite the creation of a working group

28 О. Спасов, Н. Даскалова & В. Георгиева, *Да бъдеш журналист: състояние на професията* (София: АЕЖ – България, Фондация Медийна демокрация, 2017), pp. 62–73, 111–112, <http://fmd.bg/wp-content/uploads/2017/10/JournalistProfessionBG2017.pdf>; Valkov, *Media Under Fire. For More Editorial Responsibility. 2022 – Annual Survey of Freedom of Speech in Bulgaria*; АЕЖ, "АЕЖ призова съда в Стара Загора да разгледа без ненужни отлагания казуса с неизплатени заплати на журналисти", *АЕЖ – България*, 27 февруари 2023, <https://aej-bulgaria.org/27022023/>

29 Valkov, *Media Under Fire. For More Editorial Responsibility. 2022 – Annual Survey of Freedom of Speech in Bulgaria*, p.46; Spas Spasov, online interview.

30 ECPMF, *Mapping Media Freedom: Bulgaria: 2018–2022*, European Centre for Press and Media Freedom, <https://www.mappingmediafreedom.org/#/>

31 Council of Europe, *Safety of Journalists Platform: Bulgaria: 2018–2022*, Council of Europe, <https://fom.coe.int/en/pays/detail/11709492>

32 ФРГИ, "Тревожно е състоянието на журналистиката в България", *Фондация Работилница за граждански инициативи*, 28 юли 2023, <https://frgi.bg/bg/articles/aktualno/trevozhno-e-sastoyaniето-na-zhurnalistikata-v-bulgariya>

33 Л. Георгиева – Матеева & С. Желева, *Цента на свободното слово* (София: Фондация Антикорупционен фонд), https://acf.bg/wp-content/uploads/2023/04/cenata_na-svobodnoto_slovo_web.pdf

34 The problem has been repeatedly reported in research and monitoring evaluations in the last decade, as well as confirmed by the experts interviewed by the Bulgarian country team for the purpose of the Local Media for Democracy project.

which is meant to start working [...] on this topic.”³⁵ There is only partial transparency on the part of the allocating authorities with regard to funds already distributed.³⁶ Public funding has provided local authorities with the opportunity to influence local and regional media, as this funding is a substantial part of media income.³⁷

Under the Radio and Television Act, the Council for Electronic Media (CEM), the media authority, has three main sets of powers, including in the field of regional and local media: market structuring (licensing, registration, implementation of a notification regime for online platforms), monitoring of compliance with the law and licences, and powers in relation to public service broadcasting. In the past two years, there have been growing concerns regarding the independence of the CEM.³⁸

The regional branches of the BNT and the BNR share the weaknesses commonly associated with regional media in general such as close ties with local authorities and a high level of self-censorship in reporting on local government issues.³⁹ Thus, more serious local political affairs are usually covered by journalists with the broadcasters’ national channels.

The lack of resources and challenges to editorial independence have had strong negative effects on content diversity in local and regional media. The Local Integrity System Index 2022 states: “With the exception of Sofia [...] and some larger cities, the palette of media that cover the full spectrum of significant viewpoints, political and social stances is shrinking. Significant issues for society are absent from media politics.”⁴⁰ Copy-paste journalism and uncritical coverage of local authorities are common.⁴¹

Social inclusiveness – High risk (68%)

The indicator on social inclusiveness scores high risk for Bulgaria, 68%. Medium risk is identified only in terms of PSM coverage. The BNT and the BNR provide minority-related content,⁴² albeit with some significant deficiencies. The BNT broadcasts a daily 9-minute news bulletin in Turkish, catering to the Turkish minority, the country’s largest minority group. Additionally, since June 2023, the BNT has been offering Ukrainian-language news bulletins, primarily aimed at Ukrainian refugees. The BNR and the BNT are predominantly neutral in reporting on minority groups.⁴³ Coverage of migrants, on PSM as well as on private media outlets, is mainly in the context of illegal trafficking of migrants from the Middle East and North Africa, with the authorities being the main spokespersons on the issue.⁴⁴

The leading private media outlets do not provide regular content dedicated to minority and marginalised groups. News reporting is predominantly on migrants, followed by Roma and LGBTQ people, with very scarce coverage of the Turkish minority.⁴⁵ Most affected by negative coverage, including hate speech and

35 European Commission, “2023 Rule of Law Report. Country Chapter on the rule of law situation in Bulgaria”, *European Commission*, 5 July 2023, p. 1, https://commission.europa.eu/system/files/2023-07/10_1_52568_coun_chap_bulgaria_en.pdf

36 According to Article 6a (3) of the Tourism Act, the Minister of Tourism publishes monthly on the Ministry’s website a report with information on the funds spent, as well as on the effectiveness of advertising according to data provided by the platforms or search engines. Закон за туризма (обн. ДВ. бр.30 от 26 Март 2013), *Lex.bg*, <https://lex.bg/bg/laws/ldoc/2135845281>.

37 See e.g., С. Спасов, “Предизборно и “на калпак” община Варна отново раздаде хиляди на медии”, *Дневник*, 19 март 2021, https://www.dnevnik.bg/bulgaria/2021/03/19/4186479_predizbornno_i_na_kalpak_obshtina_varna_otново_razdade/, Transparency International Bulgaria, “Местна система за почтеност: Индекс 2022”.

38 O. Spassov, N. Ognyanova & N. Daskalova. *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia & Turkey in the Year 2022. Country Report: Bulgaria*, p.13.

39 Information provided for the purpose of the Local Media for Democracy project by journalists working in the public media.

40 Transparency International Bulgaria, “Местна система за почтеност: Индекс 2022”.

41 Information validated by interviews with journalists (Spas Spasov, online interview; interview with a journalist under the condition of guaranteeing their anonymity, 17 July 2023, in person), as well as by a survey among local civil society organisations (15–30 June 2023) and sample media monitoring, conducted by the Bulgarian research team for the purpose of the Local Media for Democracy project.

42 Republic of Bulgaria, “Fifth Report submitted by Bulgaria Pursuant to Article 25, paragraph 2 of the Framework Convention for the Protection of National Minorities – received on 22 October 2021”, *Council of Europe*, <https://rm.coe.int/5th-sr-bulgaria-en/1680a4495f>.

43 И. Инджов, *ЛГБТИ – Новата медийна мишена вместо ромите? (Образът на малцинствените и уязвимите групи в българските медии)* (София: БХК, 2023), <https://www.bghelsinki.org/web/files/reports/173/files/2023-indjov--the-image-of-minority-groups-in-the-media.pdf>

44 *Ibid.*; also monitoring by the Bulgarian country team.

45 According to a study on media representation of minorities and vulnerable groups in the online content of 13 leading media outlets in January–February 2023, see Инджов, *ЛГБТИ – Новата медийна мишена вместо ромите? (Образът на малцинствените и уязвимите групи в българските медии)*, p.8.

disinformation, are Roma and LGBTQ people.⁴⁶ There are outlets that address marginalised groups in particular (people with disabilities, women, youth etc), but they have limited impact and reach.

Local and regional media content does not adequately meet the critical information needs of local communities. The most serious problem in this respect stems from the close ties of the local press with the local government, as a result of which critical coverage of political life is severely limited.⁴⁷ Political and economic dependencies of local outlets prevent them from sufficiently protecting the public interest and undermine readers' trust in them.⁴⁸

Best practices and open public sphere

Legacy media outlets make efforts to expand their reach by migrating online, offering online access to their print archive, encouraging local communities to report news, and publishing audience-generated content (photos, videos, and opinions). Some local and regional media disseminate their editorial content on their social media channels. Against the background of widespread problems with editorial independence and critical coverage, the *Za istinata* online media platform has a network of journalists across the country and publishes investigations on local matters.

In addition, there are popular social media groups where local communities report and discuss information relevant to the community. In some areas, including rural areas and neighbourhoods, some of these groups are particularly effective in communicating and discussing local issues. In other areas, participants are more passive. Usually, the content of such groups is very eclectic in regard to media content, user-generated content, anecdotes, advertisements and the promotion of private services. However, misinformation also takes place. Overall, the picture in the country is mixed, and such initiatives are only partially and not consistently effective in tackling the problems associated with the provision of local news.

46 *Ibid.*; see also: C.E.G.A Foundation, *Care for Truth – Against Fake News and Anti-Roma Disinformation* (Sofia: C.E.G.A Foundation, 2022), https://cega.bg/wp-content/uploads/2022/07/EN_CARE-4-TRUTH_book_web.pdf

47 Information validated by interviews with journalists (Spas Spasov, online interview; interview with a journalist under the condition of guaranteeing their anonymity, 17 July 2023, in person) and a survey among local civil society organisations (15–30 June 2023), conducted by the Bulgarian research team. See also Transparency International Bulgaria, “Местна система за почтеност: Индекс 2022”.

48 Симеонова, “Местната и регионална преса в България – между упадъка и надеждите на читателите”.



Croatia

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Context

The concept of news deserts has yet to be recognised in the Croatian public discourse, and as a subject in media and communication research.¹ The discourse and research have been focusing on local and community media, which allows us to describe and define vulnerable communities in “news deserts”.

In Croatia, the legal framework does not explicitly define local media. However, there are some special provisions in the Electronic Media Act for media that operate with a broadcasting license with a regional or local reach.² These media are also recognised as beneficiaries of public subsidies, supported by the Fund for Media Pluralism, operated by the regulatory agency (Agency for Electronic Media, AEM).³

The idea of community media and their goals and purpose are often misunderstood.⁴ Community media are labelled as non-profit media by national legislation and defined as either broadcast or digital media established by civil society groups, educational or religious organizations, unions, and other non-profit organisations.⁵ In this sense, this media sector is defined by the type of ownership; the legal definition excludes print media.

The local and regional press and radio stations have a rather long tradition in Croatia, many local media outlets emerged in the mid-twentieth century. According to the AEM, there are currently 19 television channels and 140 radio stations with a regional or local broadcasting license (14 of them are non-profit). There are currently six daily regional and local newspapers and numerous weekly and monthly newspapers and magazines dedicated to a particular local community, also catered for by regional and local outlets of public service media (HRT).

Although there is a larger number of local media on the media market, some areas are poorly covered and could be described as news deserts, which most often overlap with weaker economic development and lower internet penetration.⁶

1 The exception is M. Skender, *Medijske pustinje*, 2023, https://public.tableau.com/app/profile/melisa7395/viz/medijske_pustinje_EN/Dashboard1

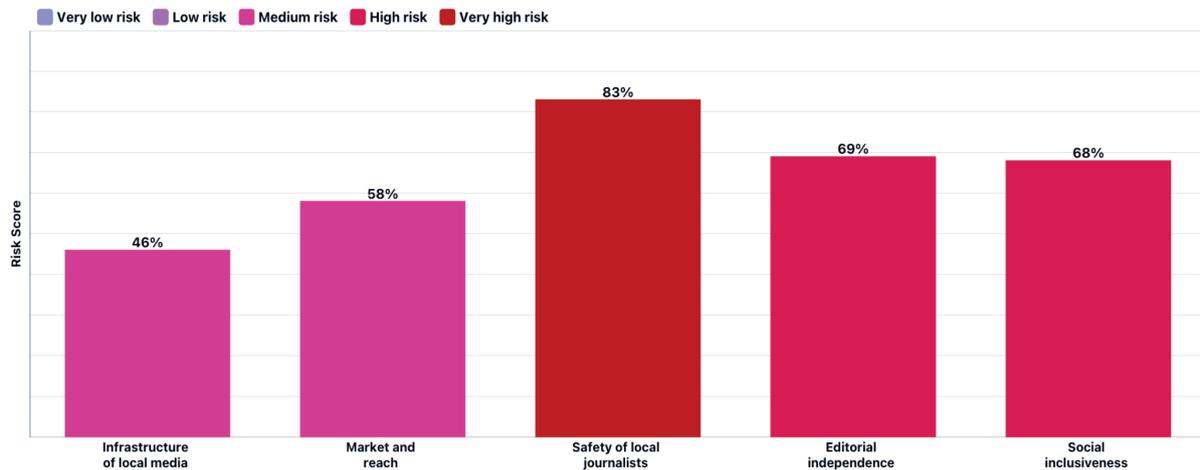
2 Articles 38 and 39 of the Electronic Media Act (OG 111/21).

3 Details about the Fund can be found here: <https://www.aem.hr/kategorija/fond-za-pluralizam/>

4 D. Vozab, Z. Peruško and A. Čuvalo, ‘Treći medijski sektor iz perspektive demokratski angažiranih publika’, *Politička misao*, vol. 54/3, 2017, 108–131.

5 Article 55 of the Electronic Media Act (OG 111/21).

6 For example, regions such as Ličko-senjska, Karlovačka, Sisačko-moslavačka and parts of Slavonia.



The granularity of infrastructure of local media - Medium risk (46%)

In Croatia, more than 40% of the population lives in rural areas, most of whom are older than 65. The most common local media is (commercial) radio. There are 140 local FM radio stations out of which 16 cover rural areas in Northern, Pannonian, and Adriatic Croatia (all in Dalmatia) but none of them are located in rural areas.⁷ Several local internet radio stations are located in rural areas. Twenty regional commercial radio stations cover rural, urban, and suburban areas in the same areas and Zagreb County. However, local and regional radio stations broadcast mostly music (65% local and 70% regional).⁸

There were 9 registered local print outlets in rural areas in 2019.⁹ Three regional daily newspapers cover rural, suburban, and urban areas and one national daily (*Večernji list*) publishes local/regional news.

All local and regional radio stations covering suburban areas are commercial and none of them are located in suburban areas. Suburban regions are addressed mostly by regional radio stations and somewhat by local or regional print, combined print, and online or only online media outlets. Therefore, there are no specific suburban print, combined, or online media outlets addressing suburban audiences. Most of the local suburban radio stations are located in Zagreb. According to a 2017 study, around 33% of all Croatian online publications address local audiences (cities or municipalities), 15% for regional audiences and 1% Croatian diasporas and international regional audiences.¹⁰

Urban audiences in Croatia have access to the most diverse media infrastructure: local print media, local commercial radio stations, combined print and online media, and online media outlets. The great number of local and regional media is located in Zagreb and the towns in Zagreb County. Local urban media are diverse in terms of the number of media outlets and types of media, yet there are indications that they lack diversity in content.¹¹ Most of the local online media copies information from the official web pages of local authorities.¹² One national daily newspaper (*Večernji list*) has 10 regional newsrooms in all regions. Croatian PSM (HRT - Croatian Radiotelevision) has 9 regional centres, most of them in Adriatic Croatia. There are also 14 PSM correspondents from 12 Croatian cities and 2 in Bosnia and Herzegovina. The main national news agency, HINA, registered 9 full-time correspondents in 6 counties and in the largest cities.¹³ In

7 Croatian Chamber of Economy, Register of Print Media, 2019; AEM, Register of Electronic Media, 2023; and Skender, Medijske pustinja, 2023.

8 Croatian Bureau of Statistics, Radio i televizija u 2022, 2023, <https://podaci.dzs.hr/2023/hr/58157>

9 Croatian Chamber of Economy, Register of Print Media, 2019. Although these data should be public and updated, they are not easily accessible. The authors of this chapter asked for it to the Croatian Chamber of Economy and received data for 2019 for print media.

10 P. Bilić, I. Balabanić, J. Primorac, K. Jurlin and R. Eterović, *Analiza tržišta elektroničkih publikacija*, 2017, Institut za razvoj i međunarodne odnose. No more recent study on the topic is available.

11 I. Toma, Portali u Hrvatskoj: sredstvo za informiranje ili manipuliranje? Association for the Protection of Journalists' Authorship Rights, 2023, https://dznep.hr/wp-content/uploads/2023/02/Istrazivanje-o-portalima_livanka-Toma.pdf; H. Šimičević, Kesica presica, Portal Novosti, 2023, <https://www.portalnovosti.com/kesica-presica>.

12 Toma, Portali u Hrvatskoj.

13 HINA, Izvješće o radu Upravnog vijeća HINE, 2019

smaller cities, HINA's network consists of around 40-50 correspondents on some kind of temporary contract and around 100 full-time journalists, photo reporters, editors, and other employees within the newsroom.¹⁴ The data show a constant decrease in the number of employed local media journalists from 2008 to 2018.¹⁵

The map you can find at the [following link](#) refers to the number of local and regional media in Croatia in 2023. The original data source for this visualisation is Croatian Journalists Society (HND) and Syndicate of Croatian Journalists (SNH) and you can access it [here](#).”

Market and reach- Medium risk (58%)

In 2022 the media sector showed a general increase in revenues from commercial advertising in the TV and online media sectors, and a decrease in print and radio.¹⁶ A decrease in advertising revenues makes local radio stations especially vulnerable due to a fragmented market. An increase in internet advertising revenues is sustainable only for the few biggest publishers. Most of the print media faced a decrease in income from subscriptions in 2021.¹⁷

There is no published data on state financial support to media but several studies show that local media depend on local state financial support, which is not transparent and is often used as a tool of political pressure on media.¹⁸ Local authorities continuously subsidise certain privileged media, even not local but national media.¹⁹ Municipal media funding and State Treasury media funding in local media for 2020 and 2021 show a significant decrease.²⁰ Support from the Fund for Media Pluralism for local televisions and radio varies but it decreased in the last two years. Print media is supported through tax reduction.²¹

Community (or non-profit) media can apply for the financial support of the Fund for Media Pluralism, support from the Ministry of Culture and Media (public calls), and the support of EU Funds. The non-profit minority media are financed from the state funds for minorities.²² If we broaden the definition of community media to local media aimed at specific local communities, there are some indications of an increase in revenues²³ in radio sectors before the COVID-19 pandemic. Analyses of local media financial models²⁴ show that the existing model is unsustainable due to changes in the regulatory environment.

Three media companies dominate the local/regional print market. The first two have 40–60% market shares in circulation. The concentration on the online local media market is smaller but with the same media companies present online. The radio market is relatively regionally fragmented and out of 103 private local radio stations, 32 were owned by 8 people.²⁵ Though all electronic media should send data about ownership structure, the real owners (those with influence) are unknown.

14 HINA, Izvješće o radu Upravnog vijeća HINE, 2020

15 M. Gregurević, Odumiranje lokalnih medija, Faktograf.hr, 2021, <https://faktograf.hr/2021/07/30/odumiranje-lokalnih-medija-doprinosi-sirenju-dezinformacija/>

16 The Ministry of Culture and Media, Croatian Media Sector Analysis, 2022.

17 Croatian Competition Agency, Print Market Research Report, 2022.

18 S. Paparella, O. Ivković Novokmet and M. Skender, Državno financiranje bez jasnih kriterija- alat za cenzuriranje medija?, Gong, 2022, <https://gong.hr/wp-content/uploads/2022/10/Drzavno-financiranje-bez-jasnih-kriterija-Alat-za-cenzuriranje-medija.pdf>; M. Skender, Analiza financiranja lokalnih medija javnim novcem, 2022, <https://www.hnd.hr/uploads/files/0Analiza%20financiranja%20lokalnih%20medija%20javnim%20novcem.pdf>

19 M. Skender, State Treasury Media Funding, 2022, <https://public.tableau.com/app/profile/melisa7395/viz/Statetreasurymediafunding20202021/Dashboard3> and M. Skender, Municipalities Media Funding, 2022, <https://public.tableau.com/app/profile/melisa7395/viz/Municipalitiesmediafunding/Dashboard1>

20 Skender, Municipalities Media Funding.

21 The lowest VAT, 5% is for daily newspapers with the statute of media (Act on the Tax on Added Value).

22 Article 15 of the Constitutional Law on Minorities Rights (OG 155/02).

23 S. Paparella, Radio postaje - unosan biznis koji je privukao i moćne tajkune, 2019, <https://hnd.hr/radio-postaje-unosan-biznis-koji-je-privukao-i-mocne-tajkune>

24 Skender, Analiza financiranja lokalnih medija javnim novcem.

25 N. Mirković and D. Žagar, Pluralizam i vlasništvo medija u Hrvatskoj – slučaj tržišta lokalnih radija, GONG, 2013, https://www.gong.hr/media/uploads/20140212_analiza_uska_grla_lokalnih_radija_u_hrvatskoj_finalno.pdf

The distribution of print media faced a decrease in the physical points of sale and sales.²⁶ Most of the radio and TV stations have web pages with selective online streaming. IPTV and internet services are provided by 3 telecom companies²⁷ with a growing number of employees.²⁸ Around 37% of households have access only to public terrestrial TV, 32% of households are IPTV users, 10% are cable TV users, and 9% are SAT TV users. Internet penetration in Croatia is 86%, lower than the EU average (93%).²⁹ The gap between cities and rural areas in household internet access is around 10%.³⁰ In rural areas in Croatia, only 47% of households have access to fast broadband.³¹ Less than 50% of citizens have contact with local TV, print, and online media while radio is the most popular local media.³² Pay TV share is higher in Croatia than the EU average.³³ Pay TV revenues grew 3,8% and on-demand consumer revenues grew 33,6%. At the same time, only 8% of digital news audiences are willing to pay for online news.³⁴

Safety of local journalists - Very high risk (83%)

The safety of journalists is the highest risk for local journalism, with the very high risk posed by the working conditions of freelance journalists and SLAPP cases. Although full-time employed journalists are relatively well protected under the Labour Act, a large share of journalists are not employed full time, and are thus far less protected (e.g. with unregulated parental or sick leave, and no unemployment benefits). The Labour Act and the Media Act are often not respected when it comes to journalistic work, and self-regulatory measures by the media are also weak.³⁵ The wages in the sector are very low and even lower in local journalism. Available data show that the wage among local journalists is between 500 to 700 euro for journalists and between 700 to 900 euro for editors.³⁶ One survey demonstrated that almost two-thirds of freelancers in media receive below the average net monthly wage.³⁷ For comparison, since January 2023, the minimum wage has been set to 560 euro, and the average net monthly wage in January 2023 was 1,094 euro.³⁸ The working conditions of journalists are also poorly protected by collective agreements, and only two media companies have collective agreements that are regularly renewed, both of which are public service media.³⁹

Most of the reported attacks on journalists are in the form of verbal attacks and threats, but there have also been cases of physical assaults on journalists over the last five years.⁴⁰ The nature of the attacks on journalists has been changing, with fewer physical attacks, but more threats directed toward journalists.⁴¹ Online threats are very common, but rarely reported.

26 Croatian Competition Agency, Print Market Research Report, 2022

27 Croatian Regulatory Authority for Network Industries, Testiranje kvalitete mreže (Net Check), 2023.

28 Lj. Božić, Sektorske analize: Telekomunikacije, 2023.

29 Eurostat, Digital Economy and Society, 2023, <https://ec.europa.eu/eurostat/web/digital-economy-and-society>

30 Eurostat, Digital Economy and Society.

31 Croatian Regulatory Authority for Network Industries, Three-monthly report for the first trimester of 2023. https://www.hakom.hr/UserDocsImages/2022/e_trziste/Tromjese%C4%8Dni%20usporedni%20podatci%20za%20tr%C5%BEi%C5%A1te%20elektroni%C4%8Dkih%20komunikacija%20RHQ12022.pdf?vel=440635

32 I. Burić, I. Desović, P. Ivišić and A. Šalinović, Analysis of the Social Impact of the Fund for the Promotion of Pluralism and Diversity of Electronic Media, AEM, 2018, https://www.aem.hr/wp-content/uploads/2019/02/AEM_Studija-utjecaja-Fonda-2013.-2015..pdf

33 European Audiovisual Observatory Yearbook, 2022

34 Z. Peruško, Digital News Report for Croatia, 2023, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2023/croatia>

35 Safe journalists, Western Balkans Journalists' Safety Index, Narrative Report [Croatia], 2021, <https://safejournalists.net/safejournalists-index-zagreb/>.

36 Safe journalists, Western Balkans Journalists' Safety Index.

37 D. Vozab, Status of atypical workers and freelancers in Croatian media, Trade Union of Croatian Journalists, 2022, <http://www.snh.hr/wp-content/uploads/2022/12/Media-Freelancers-Report-on-working-conditions.pdf>

38 Croatian Bureau of Statistics, Data on average wages, 2023, <https://dzs.gov.hr/vijesti/prosjecna-mjesečna-neto-plaća-za-sijecanj-2023-iznosila-je-1-094-eura/148>

39 Maja Sever, President of the Trade Union of Croatian Journalists and the European Journalist's Federation, June 2023, phone interview.

40 European Centre for Press and Media Freedom, Mapping Media Freedom, <https://mappingmediafreedom.org/#/>

41 Melisa Skender, the Chief Secretary of the Croatian Journalist's Association, June 2023, online interview.

According to the data from the Croatian Journalists Association, there were 945 active lawsuits against media and journalists on damage to reputation and honour in 2023.⁴² Lawsuits are especially dangerous for the local media because they threaten their economic viability and bring great financial and psychological toll on local journalists, who usually live close to people who filed the lawsuit against them. The Ministry of Media and Culture announced it is developing a National Plan for Media and Culture Development from 2023 to 2027, in which one of the measures is protecting journalists from SLAPP lawsuits.⁴³ However, these measures still need to be set up and only when implemented the results of these policies will be visible.

Professional associations are active and vocal in promoting ethical standards in the profession. However, they are less effective in ensuring professional standards on the local level because of the shrinking number of local newsrooms, and an inadequately regulated media system. Self-regulatory measures are also weak in ensuring editorial independence.

Editorial independence - High risk (69%)

This is the indicator with the second highest risk score (69%), with great risks coming from political influence on local media, through measures such as state advertising.

Regional and local administrative units are sometimes the only owners, or a part of the ownership structure, of regional and local media. There are instances of indirect political control over local media with owners having close ties to political parties.⁴⁴

There are many cases of the unfair and non-transparent allocation of subsidies and state advertising on the local level, which allows for strong political interference in local media autonomy. Local and regional media receive subsidies from the European funding programmes and the Fund for Media Pluralism operated by the regulatory agency in a rather transparent manner. However, regional and local administrative units also subsidise regional and local media from their budget, which is often criticised as non-transparent, without clear criteria, and with the decision on fund allocation often being made discretionary by the head of the local government. The analysis found that contracts between some regional and local governments and media after the public calls for subsidies specify that the media are obliged to report and promote the activities of local governments to receive a subsidy.⁴⁵ For example, a local television channel made contracts with local governments offering “production, filming, and broadcasting of specialised interviews” in their news and current affairs programmes.⁴⁶ Therefore, local budget subsidies are often a way of covert state advertising.

State institutions and state-owned entities are obligated to allocate 15% of their annual budget for the promotion of their activities in regional and local media.⁴⁷ The legal framework does not define criteria and procedures to ensure transparency and fairness in state advertising, and research suggests that state advertising is mostly done in a non-transparent manner and used for political influence.⁴⁸ There are many examples of state-owned enterprises, ministries, and other state institutions making contracts either with media outlets or PR agencies, which serve as intermediaries in distributing promotional content in media.⁴⁹

42 Croatian Journalists' Association, Istraživanje HND-a: broj tužbi protiv novinara i medija ne jenjava, aktivno najmanje 945 tužbi, 2023, <https://www.hnd.hr/istrazivanje-hnd-a-broj-tuzbi-protiv-novinara-i-medija-ne-jenjava-aktivno-najmanje-945-tuzbi>

43 Croatian Journalist's Association, Panel- SLAPP, oružje za cenzuru: cilj je da ne bude niti jedne SLAPP tužbe, 2023, <https://www.hnd.hr/panel-slapp-oruzje-za-cenzuru-cilj-je-da-ne-bude-niti-jedne-slapp-tuzbe>

44 There were cases of local television stations whose owners had ties to political parties. For example, people and companies in the ownership structure of the local television Z1 were reported to be connected with the party Domovinski pokret, see S. Paparella, Godinu dana nakon kupnje, misteriozni vlasnik već prodaje Z1, Zagrebi.hr, 2022, <https://zagrebi.hr/godinu-dana-nakon-kupnje-misteriozni-vlasnik-vec-prodaje-z1/>. Osječka televizija was bought by a owner connected to the party HDZ in a famous corruption case in 2010- although the ownership changed in the meantime, there is still a possibility of political control, see H. Šimičević, Gradonačelnika ima tko da snima, Portal Novosti, 2022, <https://www.portalnovosti.com/gradonacelnika-ima-tko-da-snima>.

45 Skender, Analiza financiranja lokalnih medija javnim novcem.

46 Šimičević, Gradonačelnika ima tko da snima.

47 Article 38 of the Electronic Media Act (OG 111/21).

48 Paparella, Ivković Novokmet, Skender, Državno financiranje bez jasnih kriterija.

49 Paparella, Ivković Novokmet, Skender, Državno financiranje bez jasnih kriterija.

Many promotional articles are not clearly labelled as such, which is a violation of the Media Act. These practices threaten local journalism, which is being replaced by local government PR.

Research demonstrates that journalists recognise strong commercial pressures,⁵⁰ and that pressure towards sensationalism and profit-making has increased over time.⁵¹ When asked to rank sources of influence on journalistic work in a survey, journalists ranked advertisers in second place.⁵² Although the Media Act and the Electronic Media Act⁵³ regulate advertising in media—advertising in media should be clearly stated, should not be misleading, and hidden advertising is forbidden—some analyses of local media found that promotional content was not always labelled as such, thus breaching this legislation.⁵⁴ Regulatory and self-regulatory safeguards prove ineffective against political influence over editorial content, with systematic cases of influence.

The regulatory agency (AEM) has a remit over all local television channels, radio stations, and digital media, but not over local print media, nor does it have its local branches. Although there was a case of a controversial decision on the license allocation to a local radio station in 2021, there was no clear evidence that it was caused by political or economic influence.⁵⁵

Because management boards of public media are usually appointed in parliament, the political majority currently in charge has great political influence over public service media, and therefore also on the local branches. However, this is different from the private local media outlets, which are usually also funded by local governments and are dependent on them financially. The local branches of public service media do not depend on local governments financially, but political influence is present at the national level, which has repercussions on the local level as well.⁵⁶ Overall, local media content can be assessed as just partially diverse.

Social inclusiveness- High risk (68%)

The Constitutional Act on the Rights of National Minorities in the Republic of Croatia requires that national minorities should have access to media content in their language at least once a week, but this is not implemented well in practice.⁵⁷ The amount of PSM broadcasting in minority languages is not enough to achieve interculturalism. Minorities are underrepresented in the news but when they are represented, they are usually in the news about crime, or accidents. When members of minorities are involved in crime, the media sometimes emphasise ethnicity. There has been less media emphasis on ethnicity in recent years, but ethnicity is revealed and becomes an issue in social media, and this transfers to mainstream media. Besides (partly) public service broadcasters, only minority media (print and online) offer informative content in minority languages (based on the preliminary analysis of the registered media).⁵⁸

There are few electronic media targeting marginalized groups (e.g. LGBT, women), yet there is no data on their reach or content.⁵⁹ Mainstream media either do not represent marginalised groups, or represent them in negative news, or frame them as a problem. There are still problematic terms used by the media concerning members of the LGBT community. Persons with disabilities are mostly invisible in the media,

50 H. Popović, 'Commercialization and Privatization of Media in Southeast Europe: A Wolf in Sheep's Clothing?' *The Political Economy of Communication*, v. 3, n. 1, 2015, ISSN 2357-1705. <https://www.polecom.org/index.php/polecom/article/view/49/240>

51 Z. Peruško, A. Čuvalo and D. Vozab, *Journalists in Croatia, Worlds of Journalism Country Report*, 2016, https://epub.ub.uni-muenchen.de/29703/1/Country_report_Croatia.pdf

52 Ž. Ivanuš, *Novinarska etičnost pod pritiskom interesnih skupina- iskustva hrvatskih novinara*, *Media, culture and public relations*, 12, 1, p. 73-90, 2021, <https://doi.org/10.32914/mcpr.12.1.4>

53 Article 5 of the Media Act (OG 59/04, 84/11, 81/13, 114/22) and articles 21 and 22 of the Electronic Media Act (OG 111/21, 114/22).

54 D. Vozab, *Lokalni mediji za bolje društvo. Nacionalni izvještaj-Hrvatska*, 2022, <https://www.snh.hr/wp-content/uploads/2022/09/Istrazivanje-Hrvatska.pdf>; Paparella, Ivković Novokmet, Skender, *Državno financiranje bez jasnih kriterija*.

55 P. Bilić, M. Valečić and T. Prug, *Monitoring media pluralism in the digital era- Country report: Croatia*, *Centre for Media Pluralism and Media Freedom*, 2022, <https://cadmus.eui.eu/bitstream/handle/1814/74684/MPM2022-Croatia-EN.pdf?sequence=1>

56 Interview with Maja Sever, June 2023.

57 The exception is Prizma on Croatian public television (HRT), which publishes weekly reports in national minority languages. A local radio branch of the public broadcaster, Radio Pula, regularly broadcasts programmes in the Italian language.

58 Croatian Chamber of Economy, *Register of Print Media*, 2019; AEM, *Register of Electronic Media*, 2023.

59 Libela, *Portal o rodu, spolu i demokraciji*, <https://www.libela.org/>; Crol, *LGBT News portal*, <https://www.crol.hr/>; *Vox Feminae*, <https://voxfeminae.net/>

present only when they are advocating for their basic rights. They are never invited to speak as experts in the field or to express their opinions on topics not connected to their disability.⁶⁰

Local media have a local focus and cover local actors, but there is less diversity in covering different themes and actors; mostly they cover crime stories, economy, health, and local politics. The main actors are mostly men, and elites, local politicians currently in power. Some actors with importance for the local community are rarely covered, like oppositional politicians, civil society actors, trade unions, religious actors, and people from culture, arts, and education.⁶¹ The most common sources of news are the official sources. Local media audiences (except local radio audiences) interact with local media usually by chance. Another challenge for local media is the lack of sustainable resources, which is one of the main reasons why local programme content is perceived as dull, outdated, and non-innovative.⁶² The most consumed content on local media (television, radio, and online) is news and current affairs, culture, and content about national minorities. Audiences found local media to be the most trusted source of information,⁶³ evaluating as best in local media the amount of content about local issues, reliable information, diversity, and quality in content. They are dissatisfied with the way local communities and citizens are represented in content by local radio stations.⁶⁴

Best practices and open public sphere

There is not much data concerning innovation in news media organisations to improve reach and audiences. The analysis found that journalists do not use social media that much for audience participation,⁶⁵ and Croatian universities do not adequately support innovation in media and journalism.⁶⁶ Journalists and editors accept some innovative approaches, like constructive journalism, but there are several obstacles to the implementation of innovation.⁶⁷

Croatian media are not keen to experiment with new forms of reporting, media production or distribution, newsroom organisation, or audience engagement, often considering such innovations as a risk in which a lot of resources would be invested, but with unpredictable results. Innovations in Croatian news media organisations mostly happen sporadically, as part of particular projects. A good example is the Croatian public broadcaster (HRT) which, as part of several projects, usually hired external production companies for some innovative projects, but these would not continue after the project ended.⁶⁸

There is some innovation present in community media, but as this media sector struggles with financial sustainability, these innovation projects are also mostly sporadic and depend on certain funding schemes. Besides the activities of professional journalists' associations, there are no visible citizen or civil society initiatives addressing media withdrawal from the local level.

60 Gordana Vilović, full-time Professor of Journalism at the University of Zagreb, October 2023, phone interview.

61 Vozab, Lokalni mediji za bolje društvo. Nacionalni izvještaj-Hrvatska.

62 Burić, Desović, Ivišić, Šalinović, Analysis of the Social Impact of the Fund for the Promotion of Pluralism and Diversity of Electronic Media.

63 Z. Peruško, Digital News Report for Croatia.

64 S. Kunac and V. Roller, 'Lokalni mediji i demokracija u Hrvatskoj: neiskorišteni potencijal', *In medias res : časopis filozofije medija*, 4(6), 2015, 860 - 880.

65 I. Nenadić, Twitter and changing journalistic practice in Croatia, doctoral thesis, Osijek, Sveučilište Josipa Jurja Strossmayera u Osijeku, 2020, https://bib.irb.hr/datoteka/1090929.Nenadic_dissertation_FINAL_29062020.pdf

66 T. Perišin and P. Mlačić, 'Studij novinarstva: Digitalni kurikulum za digitalno novinarstvo', *Medijska istraživanja*, 20 (1), 2014, 25-45.

67 P. Kovačević and T. Perišin, 'The potential of constructive journalism ideas in a Croatian context' *Journalism Practice*, 12(6), 2018, 747-763.

68 Petra Kovačević, Department of Journalism and Media Production at the Faculty of Political Science in Zagreb, June 2023, phone interview.



Cyprus

Nicholas Karides, Institute for Mass Media, IMME

Christophoros Christophorou, Independent expert

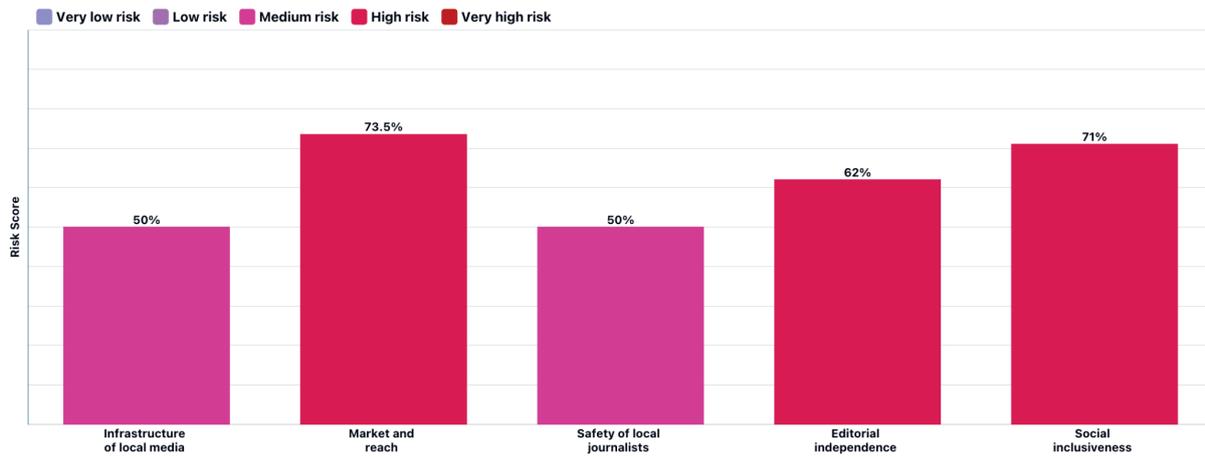
Context

The first newspaper in Cyprus was launched in 1878 at the beginning of British colonial rule. Public Broadcasting was launched under British rule in 1953 (radio) and the first TV programmes came in 1957. With independence in 1960 the Cyprus Broadcasting Corporation was established; private broadcasting followed in 1990. The term "local" is included only in the 1998 Law on Radio and Television Organisations to designate radio and television, but the term has been retained in the Law only for radio¹; after the shift to digital television in 2011, local television stations either disappeared or were turned into national coverage channels. Community media is not recognised in any law. The first de facto community media were bulletins published mainly by municipalities.

Television licences are for nation-wide coverage. Some local radio stations became national after the digital shift in 2011 and modified their content. While there are 17 local stations only five offer news and current affairs programmes, with the rest offering mostly music or religious content². However, while five local channels offer editorial content, as noted above, it cannot be confirmed that the daily needs of local communities are being addressed. In urban and suburban areas in Paphos and Limassol there are only a couple of print media, but no daily; numerous online media outlets and a limited number of local radio stations airing news and current affairs programmes are operating in the Larnaca, Limassol, Paphos and Famagusta (the district's free part) areas. Print weeklies with local content offer limited coverage of rural communities. In assessing whether rural areas in Cyprus are well served by local media outlets this research considers that Cyprus is at high risk as only some local media exist in its rural areas, but these cannot be said to reach the population living in the most remote areas of the country.

1 The Radio and Television Broadcasters Law 7(I)/1998 [https://crta.org.cy/en/assets/uploads/pdfs/FINAL%20CONSOLIDATED%20LAW%20up%20to%20Amendment%20197\(I\).2021.pdf](https://crta.org.cy/en/assets/uploads/pdfs/FINAL%20CONSOLIDATED%20LAW%20up%20to%20Amendment%20197(I).2021.pdf)

2 Cyprus Radio Television Authority, List of Radio Television Organisations, <https://crta.org.cy/katalogos-organismon/>



Granularity of infrastructure of local media- Medium risk (50%)

There is generally limited availability of local media except for what is online, which appears to have shown a relative increase over the past five years. However, due to the lack of metrics, there is no information on the reach they might have. Located in the main towns, these online media may not necessarily reach the population living in remote areas of the country. The geographical peculiarity and small size of Cyprus allow for national media (especially PSM) to provide news and topics about local and regional communities. This does compensate—to some degree—for the absence or incapacity of the local media sector to respond to existing needs; the overall score for the country is therefore judged at medium risk (50%).

Equally, given again the size of the country and the capacity of national media newsrooms to quickly address local issues and events (when necessary or when attractive from a newsworthiness perspective) it can be said that local communities are fairly well covered despite most local correspondents being stationed in the main cities. Their number has remained stable in recent years³ and, considering expectations are low, this is considered to be a low risk in the case of Cyprus.

The same low risk finding applies for the PSM, the Cyprus Broadcasting Corporation and the state-supported Cyprus News Agency, which maintain correspondents in each of the main cities.⁴ Given that distances are small and the radius of coverage for their correspondents is fairly short, rural communities are served well when necessary.

Market and Reach - High risk (73.5%)

As there is no data about local media revenues (except for local radio stations, which are overwhelmingly music related), given their limited role and marginal financial significance, it has not been possible to draw solid conclusions as to their market and reach or to identify trends. Based on an ad hoc research conducted by the authors of the present report, an increase in media outlets' online presence can be discerned—however, crucially, there is no digital law in force which means that there is no public data available or public oversight mechanisms in place to assess Market and Reach of media online. Combined with the absence of any state support for local media in any form, including the absence of state advertising, this is an area that can literally be described as a dangerous information desert for the whole territory. Similarly, no local television channels or local press exist, except for some rare manifestations of weekly or monthly but mostly irregularly printed newspapers⁵.

³ Interview with officials from the Cyprus Union of Journalists, 3/01/2024.

⁴ KYΠΕ., n.d.. <https://www.cna.org.cy/about>

⁵ Although many media are missing from the list published by the Press and Information Office, the following source offers a picture of the situation: Press and Information Office, "MEDIA/ NEWS AGENCIES LIST - PIO", n.d., <https://www.pio.gov.cy/en/media-list/>.

In terms of distribution there is just one press distribution agency in Cyprus, *Kronos*, which distributes 85% of the national (and local) press (and 100% of the international press) reaching 850 selling points (kiosks) on a daily basis with a fleet of around 60 vehicles. The agency reported that the volume of work has dropped significantly in the last 5 years⁶, given the considerable—but undefinable—fall in circulation of newspapers and magazines, but could not provide details given restrictions imposed by publishers. It can be said that the supply distribution chain adequately meets the needs of the local media market in certain media sectors and the risk here is at medium level.

More relevantly, the government does not provide any financial support, and local media outlets can be said to operate within an unfavourable business environment. They cannot be considered to be viable in the long term. A *de minimis* scheme has been in place for the press since 2017⁷ but does not cover local outlets. State advertising in local media is non-existent. As a result, the unavailability of sources of funding for the sector renders it at very high risk.

In terms of a community media sector—except within the confines of the education realm, i.e., at universities—Cyprus cannot be said to have one, and therefore no concept of a support system for it exists. As regards the viability of the local and community sector and the prospect of alternative ways of financing, given that national media are themselves struggling financially and their advertising support models are inadequate (just two have subscription models) the local sector cannot itself be deemed sustainable. The few online local media, which operate on a one to two journalist-based newsroom, are reliant on national news, copy-pasting from other news sources (usually by affiliation) and on adding the odd local story, local profile or local event to their output.

Safety of local journalists - Medium risk (50%)

There are no substantive issues with regard to the physical safety of journalists in Cyprus generally but in terms of safety of employment, journalists in small local media are susceptible to unfair treatment and changes in ownership.

An ad hoc survey by the authors of the report, has revealed that the number and size of local media in Cyprus are such that this research can only refer to a very limited number of journalists in total, even "one-person-shows" in some cases. It is considered that the operations of these tiny outlets are done through external collaborations and not necessarily within the context of a functioning newsroom. On issues of SLAPPs, for example, it could be said that local media are too small and insignificant in terms of reach and effect to be the target of SLAPPs but there is limited information available (this applies on a national level as well).

As to the risk of attacks and threats, including online, to the physical safety of journalists, this occurs rarely and there has been no increasing trend over recent years, despite one incident in 2021⁸. There is a legal framework in place to guarantee the prosecution of perpetrators of crimes against journalists, and it is generally effective, so the level of risk here is low. The Union of Cyprus Journalists is the only trade union representing journalists, both at national and local level.⁹ It remains vocal and ever present, fighting a valiant battle, but risks are still deemed to be at medium level as it is only partially effective in guaranteeing editorial independence and/or respect for professional standards.

In terms of evaluating whether local journalists and newsrooms are committed in practice to independent, fair, impartial and accountable journalism, and adherence to codes of ethics or conduct, it must be repeated that the main online outlets are small and do not operate full newsrooms in the conventional sense. Although they do carry locally specific news, these newsrooms are heavily reliant on the main

6 Information received from an unnamed source.

7 A. Charalambous, "Additional €310,000 state financial support for island's print media in 2022", *Philenews*, 4 October 2022, <https://in-cyprus.philenews.com/local/additional-e310000-state-financial-support-for-islands-print-media-in-2022/>

8 Gabriella, "Five people to appear before court in connection with attack against SIGMA TV", *Philenews*, 19 July 2021, <https://in-cyprus.philenews.com/local/five-people-to-appear-before-court-in-connection-with-attack-against-sigma-tv/>

9 See the Union of Cyprus Journalists' website: 'Ένωση Συντακτών Κύπρου (ESK), 'Ανακοινώσεις' [announcements], <https://esk.org.cy/>

Cyprus News Agency and other international agencies (mainly Greek) with which they are affiliated for a large chunk of their output. Dependent too on advertorials and limited advertising revenues, which affect their overall professional standards, they are assessed at medium risk (50%).

Editorial Independence - High risk (62%)

In a heavily online reliant local media, the most significant feature in this section is the absence of a national digital media law, which impacts the context in which these currently operate. It follows that the owners of these small media units define and influence editorial content, which is likely to be skewed towards media proprietors' businesses or other commercial interests. A major feature of local media of all forms is that much of their content is mere reproduction of news from other media.

It is important to highlight here that in July 2023 an amendment to the Law on Radio and Television Organisations abolished shareholding ceilings and other provisions on control /ownership, allowing the prospect of even one person (and potentially a politician, in office or not) controlling a media outlet as a shareholder. This allows also to control even many media outlets, through participation in the managing board of such outlets, provided the person does not own shares in the business¹⁰. While political control of media in general is regulated by the law on conflict of interest, making it incompatible to hold political office and be involved in other activities that present such a conflict, the specific provision is neither clear nor comprehensive. This new development, the amendment of the broadcasting law, therefore, renders the political control of local media by ruling parties, partisan groups or politicians as high risk.

Local media receive no state assistance in any form, not even advertising. State de minimis grants are only offered to dailies or weeklies, with specific criteria, and only to the existing press agency¹¹.

In terms of editorial content of local media being independent from commercial influence in practice this was deemed as high risk given that—as is the case on a national level—journalistic content is often blended with marketing, advertising and other commercial activities. Even when carrying locally specific news, the main online local outlets are small and may rely on bigger media for content.

The Cyprus Radio and Television Authority is the only existing regulatory body, limited to radio and television. The Authority's licensing remit covers all outlets in an independent and relatively effective way. It is governed by the Law on Radio and Television Organisations 7(I)/1998 and Regulations Normative Administrative Acts (KDP) 10/2000, which provide guarantees of its independence; its decisions can be executed immediately, even when a recourse to Court overview is made. The Authority has no local branches, all its activities are centrally located. Jurisdiction on local radio stations is exercised independently and there was no evidence of any political interference or bias in any decision.

With regard to the PSM, the Cyprus Broadcasting Corporation, a regulation framework does exist and is in fact in the process of being updated—expected in 2024—but as things stand both when it comes to the appointment and dismissal of relevant governing board positions the government's political influence is widespread, as is the board's own editorial interference. When it comes to funding, the influence of the political establishment is also prominent; the political parties decide on the PSM's budget on an annual basis. On the ground, the PSM has no local branches, operations are centralised in Nicosia with local correspondents in the main cities. The annual report of the Radio Television Authority about the PSM's mandate as public service (defined narrowly in the law) finds little that is problematic, as it focuses mainly on metrics on information, culture and entertainment programmes and not on obligations to social, political and other groups in society or other issues¹².

10 Law on Radio and Television Organisations L. 87(I)/2023 amending Law L. 7(I)/1998, https://www.cylaw.org/nomoi/arith/2023_1_087.pdf

11 Ministry of Finance, Open call for participation to the 2023 scheme, <https://mof.gov.cy/assets/modules/wnp/articles/202312/1524/docs/anoikti-prosklisi-ekdilosi-endiiferontos-2023.docx>

12 Cyprus Radio Television Authority, *Quality Control Report on RIK for 2022*, Nicosia, 2023, https://craa.org.cy/assets/uploads/pdfs/EKTHESI_RIK_2022_FINAL_compressed.pdf

Social inclusiveness - High risk (71%)

The PSM does provide news in minority languages but only for some languages, such as bulletins in English and Turkish on a daily basis. Its second TV channel RIK2 also carries news bulletins for the hearing-impaired and one of its radio stations provides news bulletins and other programmes in Turkish and Armenian¹³. But, ignoring the existence of minorities from forty different countries, representing approximately 20% of the population, can be seen as a considerable gap in the coverage of minorities. Minorities resulting from the wave of immigration over the last decade cannot be said to be represented in the PSM at all, and when they are referenced in the news, most of the time the coverage is biased and misleading. Migrants are rarely given a voice and the narratives that accompany reporting about them have mostly been those promoted by the government and its policy on immigration as well as by politicians in general. The same applies to communities of foreign national workers who are legally resident in Cyprus for work purposes.

The situation is worse when it comes to private media outlets. Here too when there is coverage it is mostly on the basis of stories that relate to national policy and difficulties in handling immigration or incidents involving migrants¹⁴. While the PSM is obliged and is expected to provide some coverage of recognised minorities¹⁵, private media are not and, unlike the PSM, minorities are generally not represented in news reporting. When represented they are usually shown in a negative light (ghetto, crime, ill feeling by locals to increasing number of immigrants in their areas).

There are no specific outlets or channels addressing marginalised groups in Cyprus. Predictably, such groups maintain a strong presence on social media and only when exposure and publicity acquire traction on those platforms, does the matter spill over into other media (and even then, it is into national and not necessarily local media). The reverse side of the coin are telethons and radio marathons, which, according to organisers, aim at promoting the cause of specific communities (i.e., people with disabilities). The latter, however, according to their representatives denounce such events as following a patronising style that humiliates them.

In terms of whether local media provide sufficient public interest news to meet the critical information needs of the communities they serve, the situation warrants a high risk rating because of the number and location of local media, because the communities and the topics covered are very limited and because the content rarely meets CINs. It must, however, be said that there is no research on this topic. Equally, as there are no news media organisations in Cyprus experimenting with innovative responses to improve reach and audience, or any proposing new forms of work, journalistic products or services, or any discernible best practices in the sector, the risk is very high at 71%.

Best practices and open public sphere

Unfortunately, there are no examples of news media organisations in Cyprus experimenting with innovative responses to improve reach and audience, or proposing new forms of work, journalistic products or services. The fact that no study on the subject has ever been done is coupled with the lack of awareness on the importance of local media. However, there seem to exist various 'communities' that organise and communicate information on social media channels, either publicly or privately, but it is not possible to verify and assess this trend. Similarly, it was not possible to find any citizen or civil society initiatives providing innovative responses to tackle the problem posed by the decline of local and community news provision. Even in the case of print local media that also have online editions, there are no indications of exploiting the possibilities offered by digital technology.

13 Cyprus Radio Television Authority, 2023, pp. 20-21 and pp.38-39.

14 "Συνελήφθη ο Σύρος που απειλούσε ότι θα μπει στα σπίτια κατοίκων" [Syros was arrested for threatening to enter residents' homes], *Pafos Press*, 29 October 2023, <https://pafospress.com/synelifthi-o-syros-poy-apeiloyse/>

15 Law on Cyprus Broadcasting Corporation, Ch. 300A, https://www.cylaw.org/nomoi/enop/non-ind/0_300A/full.html



Czech Republic

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Context

The Czech Republic is a country in the centre of Europe with 10.8 million inhabitants.¹ The structure of sub-national media information follows the traditional structure of the press before 1989 as part of the socialist media structure: regional media, most often printed daily newspapers, were and still are traditionally published in regional towns and cover the territory of the region; local media, most often printed weeklies, are traditionally published in district towns and cover the territory of the district.² However, this structure is slowly emptying out and news deserts are emerging; the decrease in the number of local newspapers is steady.³ Moreover, there is no increase in online local media.⁴

Czech local newspapers fit the definition⁵ for small-market newspapers: they are mostly weeklies distributed within the boundaries of a district; their number of copies sold per issue is, in most cases, from 1,500 to 6,000; their audience numbers have never been audited, so there is no publicly available data. Even so, local newspapers still wield power within the print media market.⁶

There are no community media in the Czech Republic: Local TV and radio stations do not deliver their own independent news, but reuse news from print and online media and create practically only paid and entertainment content.

In the Czech societal and media structure, the central role of the capital city of Prague and the centralising tendencies in the media sphere are clear. This is probably the strongest reason for the emergence of local news deserts, because from a national/Prague perspective, local and regional media are not visible. There are also significant economic disparities between the capital of Prague and the rest of the regions.⁷

1 Czech Statistical Office, September 2023, <https://www.czso.cz/csu/czso/population>

2 There were 14 regions, 76 districts and 6,258 municipalities in Czechia in January 2022. European Commission, 'Eurydice', 2023, <https://eurydice.eacea.ec.europa.eu/national-education-systems/czech-republic/main-executive-and-legislative-bodies>, OECD, Czech Republic 2016, <https://www.oecd.org/regional/regional-policy/profile-Czech-Republic.pdf>

3 L. Waschková Císařová, 'Backed Into a Corner: Structural Changes That Lead to Local News Deserts', *Media and Communication*, 2023, [Lokalnik.cz/localmedia.cz](https://lokalnik.cz/localmedia.cz).

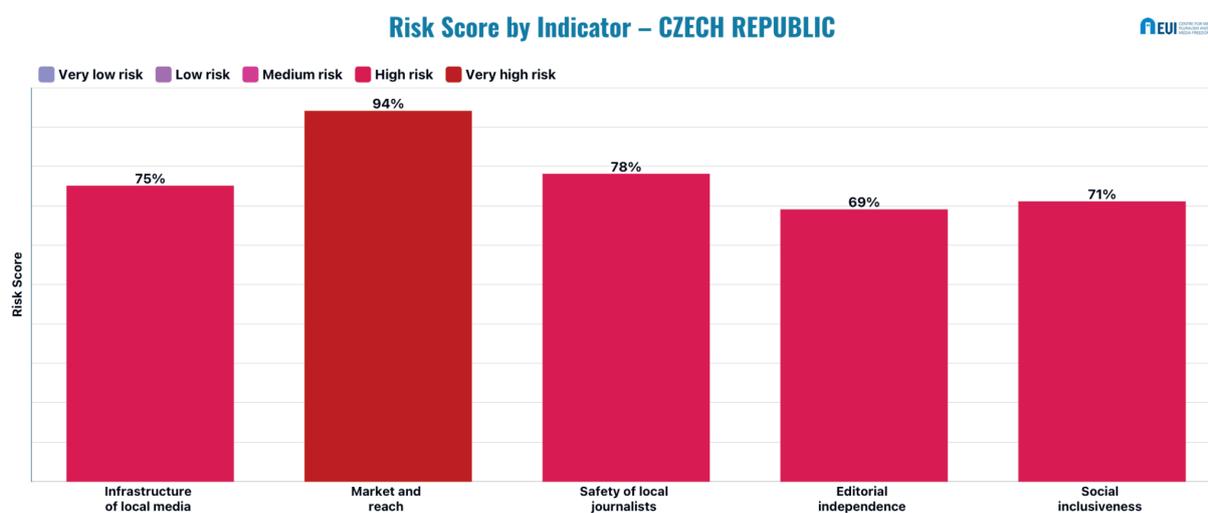
4 L. Waschková Císařová, 'We Were Innovators, but We Gave up: The Muted Digital Transition of Local Newspapers', *Digital Journalism*, 2023.

5 Ali et al., 'The Digital Life of Small Market Newspapers. Result from a multi-method study', *Digital Journalism*, 2018.

6 L. Waschková Císařová, 'Backed Into a Corner: Structural Changes That Lead to Local News Deserts', *Media and Communication*, 2023.

7 Eurostat, https://ec.europa.eu/eurostat/databrowser/view/nama_10r_2gdp/default/table?lang=en, accessed 10 November 2023.

There is no significant public debate regarding local news deserts in Czechia. One of the first sources of information on the state of local media coverage was the research of local newspapers conducted since 2009 by Lenka Waschkova Císařová.⁸ Later, information about the slowly disappearing local newspapers leaked to the national media, both as analyses⁹ or interviews.¹⁰ Only now, when, for example, among local newspapers in the Czech Republic, half of the titles have ceased publication in ten years,¹¹ the topic of local news deserts is also appearing in the analyses of NGOs¹² and in policy proposals.¹³



Granularity of infrastructure of local media- High risk (75%)

Within the Czech Republic, it is difficult to distinguish between rural and suburban areas, the most excluded locality in the Czech Republic is considered to be the Sudetenland, the historical territory on the border areas of the Czech Republic. And as visible from the local newspapers database,¹⁴ local newspapers disappeared from most of these areas. Therefore, the main local information sources in rural and suburban areas and in competition with private local media are municipally owned press or television, which are considered political mouthpieces.¹⁵ The Czech media system is very centralised, local media are only sporadically found in smaller municipalities than the district. Moreover, all print local media struggle with infrastructural problems, such as problematic distribution¹⁶ or slow digital transition.¹⁷

On the regional level, there are almost no specifically regional media (except the media chain *Vltava Labe Media*), but there is a more varied media offer in general: from regional versions of national daily newspapers and their online websites; to regional coverage of public service media, television, radio, news agency and private television stations.

The areas where journalists live reflects the centralised tendencies of the Czech media: most of the Czech journalists are based in Prague, followed by smaller regional newsrooms of national media in

8 L. Waschková Císařová, *Český lokální a regionální tisk mezi lety 1989 a 2009*, Masarykova univerzita, Brno, 2013, Lokalnik.cz/localmedia.cz.

9 T. Trumpeš, 'Lokální novinařina zmizela jako kůrovcové lesy. Stav je katastrofální', *Hlidacipes.org*, 2021, <https://hlidacipes.org/lokalni-novinarina-zmizela-jako-kurovcove-lesy-stav-je-katastrofalni/>; V. Boháč, 'Neviditelné pouště v regionech, které dusí českou demokracii', *Voxpot*, 2020, <https://www.voxpot.cz/neviditelne-pouste-v-regionech-ktere-dusi-ceskou-demokracii/>; J. Boček, 'Analýza: za 10 let zanikla polovina regionálních novin. „Můžou za to i radniční zpravodaje, říká expertka', *iRozhlas.cz*, 2020, https://www.irozhlas.cz/zpravy-domov/regionalni-lokalni-noviny-media-denik-lenka-cisarova_2002030630_jab?fbclid=IwAR3RZxwPYIhEeuwqhpOyftHGxaxCfa06yk7xYTb1N7EsNizY4T2Xk34dbH0.

10 L. Waschková Císařová, 'Lokální média mizí: Když jednoho z nás srazí auto, skončili jsme', *Deník N*, 2019, <https://denikn.cz/241514/kdyz-jednoho-z-nas-srazi-auto-skoncili-jsme-lokalni-media-jako-spolecensky-relevantni-krehke-zbozi/>.

11 L. Waschková Císařová, 'Backed Into a Corner: Structural Changes That Lead to Local News Deserts', *Media and Communication*, 2023.

12 Oživení, *Mouthpiece*, 2015, <https://hlasnatrouba.cz>.

13 Rekonstrukce státu, *Sít' k ochraně demokracie*, Média, 2019, <https://www.ochranademokracie.cz/temata/media>

14 Lokalnik.cz/localmedia.cz

15 L. Waschková Císařová, 'Comparing Czech and Slovak Council Newspapers' Policy and Regulation Development', *Media and Communication*, 2015; Oživení, *Mouthpiece*, 2015, <https://hlasnatrouba.cz>.

16 L. Waschková Císařová, 'Backed Into a Corner: Structural Changes That Lead to Local News Deserts', *Media and Communication*, 2023.

17 L. Waschková Císařová, 'We Were Innovators, but We Gave up: The Muted Digital Transition of Local Newspapers', *Digital Journalism*, 2023.

regional towns, and some local journalists in smaller (mostly district) towns. The number of these local journalists is declining, just like the number of local media.¹⁸ PSM keeps its own regional correspondents and branches, but solely in the regional towns: their reach to the localities is therefore minimal. The PSM networks have been shrinking over time and are mainly insufficient to cover the localities. Czech Radio and the Czech News Agency have no legal obligation to provide local or regional information, although the radio has established branches in regional towns and has regional broadcasting. Czech Television has a legal obligation to provide regional broadcasting, which, in the area of news and current affairs, must “include a balance of contributions from the whole of its territory”.¹⁹ Thus, public service media contribute to information at the regional level of large regional cities, but only occasionally at the local level.

The map you can find at the [following link](#) refers to the coverage of local newspapers in the Czech Republic in 2019. The original data for this visualisation was collected by Lenka Waschková Císařová - Masarykova univerzita - Fakulta sociálních studií (2019).

Market and reach - Very high risk (94%)

The Market and reach indicator was rated as a very high risk, showing the highest score among all five indicators (94%). According to local newspaper publishers, local newspaper revenue has decreased significantly in recent years, especially since the 2008 financial crisis, but also in relation to the recent energy crisis.²⁰ Most local media are built on a traditional business model and derive their main income from advertising. Nevertheless, there are no aggregate statistics regarding revenue in the Czech Republic.

Compared to the overall media economy, local newspaper publishers reflect that they are under so-called “sandwich economic pressure”: a regional chain with print and online titles Vltava Labe Media on one side, and on the other, the municipal press, taking potential advertisers and competing with private newspapers at the local level. Local publishers mentioned that after the economic crisis, and also now in the context of the energy crisis, local entrepreneurs, who advertised the most in local media, have often completely stopped spending on advertising, which is the main income of local newspapers.

According to Czech TV research, the Covid-19 pandemic led to a general decrease in the advertising revenue of media houses of up to 40 %.²¹ At the same time, the media industry is the only industry that did not receive any compensation in the time of the pandemic. Another advertising decrease came after the beginning of war in 2022.²²

There is a very high-risk level in variable assessing trends regarding closures of local media outlets and a decreasing number of local journalists. The decrease in the number of local newspapers brings a reduction of 50 percent in a decade: in 2009 there were 60 local newspapers; in 2014 there were 45; and in 2019 there were 30. Since 2019, 4 more newspapers have closed.²³ Moreover, this trend hasn't been at all offset by the growth of online local media outlets.²⁴

18 L. Waschková Císařová, 'Backed Into a Corner: Structural Changes That Lead to Local News Deserts', *Media and Communication*, 2023; 'VLM slučuje titulní strany desítek regionálních novin Deník', *MediaGuru*, 2023: <https://www.mediaguru.cz/clanky/2023/01/vlm-slučuje-titulni-strany-desitek-regionálních-novin-denik/>

19 *The Czech Television Act*, 1991, <https://www.zakonyprolidi.cz/cs/1991-483>

20 L. Waschková Císařová, 'We Were Innovators, but We Gave up: The Muted Digital Transition of Local Newspapers', *Digital Journalism*, 2023.

21 'Vydavatelé tisku loni přišli na inzerci kvůli covidu o 2,3 miliardy korun, poklesl rovněž i prodej', *Lidové noviny*, 2021, https://www.lidovky.cz/byznys/vydavatele-tisku-loni-prisli-na-inzerci-kvuli-covidu-o-2-3-miliardy-korun-poklesl-rovnez-i-prodej.A210107_150711_In-media_lihem.

22 'Inzerenti stahují reklamu kvůli válce, média ale ztrácejí příjmy', *MediaGuru*, 2022, <https://www.mediaguru.cz/clanky/2022/03/inzerenti-stahuji-reklamu-kvuli-valce-media-ale-ztraceji-prijmy/>

23 L. Waschková Císařová, 'Backed Into a Corner: Structural Changes That Lead to Local News Deserts', *Media and Communication*, 2023, Lokalnik.cz/localmedia.cz.

24 L. Waschková Císařová, 'We Were Innovators, but We Gave up: The Muted Digital Transition of Local Newspapers', *Digital Journalism*, 2023.

There is no direct subsidy system for Czech media, just an indirect subsidy through a lower VAT rate for newspapers, which will be increased by 2 % (from 10 % to 12 %) based on the current government decision.²⁵ Municipality outlets are paid by local/regional taxes through the local/regional municipalities.

There are no aggregate statistics regarding audiences' willingness to pay for local news in the Czech Republic. The subscriber's loyalty was there traditionally for print media. However, now the numbers of subscribers and newspaper sales are declining 10-20 % every year and the trend is even accelerating. Only numbers for bigger dailies operating on a national and regional level are available.²⁶

According to the research of the Association of Online Publishers (2022), more than 91 percent of respondents consider it necessary to have independent regional journalism in the Czech Republic, but two-thirds of them don't want to pay for news.²⁷

There are no aggregate statistics regarding weekly audience reach for local media outlets in the Czech Republic. According to Reuters Digital News Report 2022,²⁸ weekly reach of the regional online news website iDnes.cz is 36 %, Denik.cz 15 %, regional or local newspaper websites 8 %. Offline: regional MFdnes 14 %, regional Denik 9 %, regional or local newspapers 18 %. MFdnes and Denik are the only 2 regional newspapers publishing in all regions. There is no comparable data available on audience reach of regional (local) and national outlets.

Safety of local journalists - High risk (78%)

The indicator safety of local journalists received a high-risk score (78%). There is no current data on the working conditions of local journalists. As there is no active professional organisation to map the situation in the media, there are no such reports either. The problem of the absence of a professional organisation for the sector is mentioned in research²⁹ from 2007, and there have been no significant changes since then: "Czech journalism is characterised by the absence of a respected professional organisation that would represent an authoritative platform for a significant part of the journalistic community (...) In this respect, Czech journalists as a whole stand well outside the mainstream, especially of Western European journalism. At the regional level, this key professionalisation parameter is even lower than for journalists operating at the national level."

There is only one traditional professional organisation, Syndikát novinářů (Syndicate of Journalists), which is practically inactive.³⁰ A new organisation, the Association of Regional Journalists, was set up in 2021 without resources and therefore its development is very difficult.³¹

However, it is obvious that more and more journalists, especially at the local level, are forced to work as freelancers with contracts that do not secure them any employment protection and social security benefits. According to research from 2017, up to one fifth of journalists in the Czech Republic work externally, which is a significantly higher share than in Western or Southern European countries.³²

25 VAT Law 235/2004 Sb., 2023, <https://www.podnikatel.cz/zakony/zakon-c-235-2004-sb-o-dani-z-pridane-hodnoty/f2551483/#aktualni-zneni>

26 'Prodej deníků v pololetí klesal rychleji než v loňském roce', *MediaGuru*, 2023, <https://www.mediaguru.cz/clanky/2023/08/prodej-deniku-v-pololeti-klesal-rychleji-nez-v-lonskem-roce/>

27 Association of Online Publishers, 2022: <https://www.asociaceonlinevydavatelu.cz/media/drtiva-vetsina-cechu-stoji-o-nezavislou-zurnalistiku-dve-tretiny-z-nich-ale-za-zpravodajstvi-nechteji-platit.html>.

28 V. Štětka *Reuters Digital News Report 2022: Czech Republic*, 2022 <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/czech-republic>.

29 J. Volek, *Regionální žurnalisté v post-transformační etapě: vybrané socioprofesionální charakteristiky*, 2007, https://www.researchgate.net/publication/288004635_Regionalni_zurnaliste_v_post-transformacni_etape_vybrane_socioprofesionni_charakteristiky

30 P. Vodrážka and D. Píhová, *Mezi novináři rostou příkopy. Syndikát dlouhodobě nefunguje a chybí, říká šéfka fondu pro nezávislou žurnalistiku*, *Deník N*, 2022, <https://denikn.cz/790822/mezi-novinari-rostou-prikopy-syndikat-dlouhodob-nefunguje-a-chybi-rika-sefka-fondu-pro-nezavislou-zurnalistiku/>

31 J. Jetmar, 'Regionální novináři zakládají vlastní asociaci', *Mediář*, 2021, <https://www.mediar.cz/regionalni-novinari-zakladaji-vlastni-asociaci/>.

32 J. Volek and M. Urbánková, *Čeští novináři v komparativní perspektivě: hybridní, virtuální a mizející žurnalisté v post-transformační fázi*, 2017, https://www.researchgate.net/publication/320618422_Cesti_novinari_v_komparativni_perspektive_hybridni_virtualni_a_mizejici_zurnaliste_v_post-transformacni_fazi/link/62b5fea9dc817901fc78fc89/download.

This research also shows that 48,1 % of journalists are not satisfied with their remuneration. Those who still have proper employment contracts are subject to general labour law legislation and their contracts usually include regulation on the termination of contractual relationships, including dismissal procedures. The general labour law legislation also secures them unemployment benefit systems and maternity or parental leave. No minimum rates of pay are determined for journalists and workers in private media since there are no unions to represent journalists and attend to their working conditions. The exception applies to media workers in Public Service Media, which have unions and a collective agreement.

According to Mapping Media Freedom, over the last five years (2018-2022), there have been 20 attacks on media and journalists, 13 of them legal.³³ On the Council of Europe platform there were only 8 incidents recorded.³⁴ It is important to notice that the local level is especially underrepresented as local journalists are not organised and usually do not know about the possibilities of reporting threats. However, it is known in the journalism community that online attacks in particular are on the rise.

There is no anti-SLAPP legal framework in place. SLAPP cases have not been monitored, so there is no evidence of them. But along with economic pressures, the fear of legal threats is one of the main reasons (together with economic pressures) that have silenced critical journalism at the local level. Regional and local media are also weak economically and in terms of personnel and they could not afford to face SLAPP cases. There is no organisation in the Czech Republic that would provide assistance to journalists in such a situation. Most of the local journalists also have no information at all about foreign organisations who provide such support.

Editorial independence- High risk (69%)

According to an amendment to the Law on Conflict of Interest in force since 2024 public officials including local politicians must not be radio or TV broadcasters owners or publishers of periodicals. However, this does not apply to online media, nor does it apply where the publisher is a political party, political movement or political institute or companies controlled by them, nor to media whose operators are not required to publish an annual financial report.³⁵

Hence, the risk of dependency of editorial/decisional lines on the political activity of owners is high, and this is accompanied by strong evidence. For example, in the region of Pilsen, there is just one private local TV station (ZAK TV), and this is owned directly by a local politician, with a significant part of its income from the town hall, regional council and other public institutions. Similar projects are in several other regions as well, like RTM+, which was in 2023 fined by the regulator for threatening editorial independence.

While it is noted that, outside of 14 regional cities, there still exist some independent print media which stick to professional standards and are not under political influence, these projects are, rather, exceptions³⁶ and most of them are seriously struggling financially. Notably, there is a range of projects declaring themselves as media (“junk media”), but in fact those are usually instruments of local political-business groups and should not be called as such.³⁷ There is no official evidence of the situation in the local online environment, no overview of the ownership or monitoring of influencing the content by owners.

There are no direct state subsidies for local news media. Some local authorities support online projects misused by politicians and local businessmen through purposeful marketing projects, paying them high amounts of money for different services. There is an indirect subsidy through a lower VAT rate for newspapers³⁸, which will be increased by 2% (from 10% to 12%) from 2024 based on the current government decision. So, the distribution proves fair and transparent only in one typology (indirect).

33 ECPMF, *Mapping Media Freedom*, 2023, <https://www.mappingmediafreedom.org>, accessed 10 November 2023.

34 CoE, *CoE Safety of journalists platform*, 2023: <https://fom.coe.int/en/pays/detail/11709502>, accessed 10 November 2023.

35 ČTK, ‘Sněmovna schválila zprísňení zákona o střetu zájmů, tzv. lex Babiš’, 2023, <https://www.ceskenoviny.cz/zpravy/snemovna-schvalila-zprisneni-zakona-o-stretu-zajmu-tzv-lex-babis/2378285>, accessed 10 November 2023.

36 Lokalnik.cz/localmedia.cz

37 EFJ and consortium, *Fact finding mission to Czech republic*, 2019, <https://europeanjournalists.org/wp-content/uploads/2019/10/Czech-Republic-fact-finding-mission.pdf>

38 L. Waschková Císařová and M. Metyková, *Better the devil you don't know: post-revolutionary journalism and media ownership in the Czech Republic*, Medijske studije, 2015.

Commercial and political influences over editorial content are widespread. Regional media must constantly strive to survive economically and rely heavily on advertisers for that. As the media cannot afford withdrawal by advertisers, they refrain from publishing stories with a negative effect on their market. This ultimately leads to violations of basic journalistic rules. The same applies to politicians from local authorities when it comes to reporting on their positions. In such a context, there are only a few exceptions among local media projects that stick to professional ethics and standards (Ohlasy.info, orlickytydenik.cz), those named in the research of Lenka W. Císařová, and the regional chain Drbna.cz. As already anticipated, the violation of ethical standards happens very often in “junk media”, especially if it's about advertisements from the municipality or other regional authorities. This also confirmed by the research carried out by NGO Oživení, which observed how “Changes in the media market have led to the disappearance of independent regional newsrooms and the survival of entities that operate in symbiosis with regional or government politicians”.³⁹

All this is backed by the lack of common self-regulatory rules, which would efficiently protect editorial independence from the commercial or political interests of owners. There are codes of ethics even in media houses operating on a regional level (Denik, MFdnes), however often not being enforced or even broken. There is no functional press council for private press and online media, there is no instrument for complaints. The audio-visual regulator for TV and radio (RRTV) does not have local branches, and its activity is deemed as inefficient, in the local sphere.

With regards to PSM, it does not invest much in local newsrooms and the education of local reporters and there is no pressure to deliver any high-quality or even critical content. Therefore, the content is very similar to the content of “so-called media” and regional media, which is totally missing investigations, critical journalism, and audience engagement. While no official evidence / research of that is found, the impression is that regional branches of PSB don't deliver any critical, in-depth, or analytical journalism on regional/local issues, the content is not of high quality, and actually very similar to the low-quality content of private regional media. Finally, it can be argued that diversity of local media content is severely limited.

Social inclusiveness - High risk (71%)

Social inclusiveness has high risk score (71%). For the PSM, service to minorities is part of the public service as stipulated by law, however, there is no legal provision as to the extent and form. Czech Television for example provides content in sign language; news in Polish for a Polish minority in Silesia; news for the Ukrainian minority. Czech Radio also has a news and magazine programme for Romani people and several programmes for other minorities. Both Czech TV and Czech radio provide several programmes and documentaries on minorities, however not all minorities are represented regularly in news. Moreover, the representation of minorities in the news coverage is not always correct.⁴⁰ There are several minority media published by minorities themselves. However, most of them do not have daily news, and most of the recognised minorities do not have any news media in their language.⁴¹

Only sporadic information is available on whether local media provide sufficient public interest news to meet the critical information needs of the communities they serve. For example, data from one case-study based on focus groups and interviews with local audiences in a specific locality, where local media meet some of the community's critical information needs.⁴² Based on interviews with local journalists in a specific locality, local journalists do not have a clear idea of their audience and are not in close contact with them.⁴³

39 Oživení, *Regionální média v zemích V4 – divoký západ bez pravidel*, 2023, <https://www.oziveni.cz/2023/02/regionalni-media-v-zemich-v4/>.

40 Media Tenor, *Analýza zpravodajství českých televizí a ČRo (rok 2022)*, 2022, <https://img.ceskatelevize.cz/boss/document/1996.pdf?v=1>; Český rozhlas, *Pro národnostní menšiny*, 2023, <https://temata.rozhlas.cz/mensiny>; Česká televize, *Společenské menšiny*, 2023, <https://www.ceskatelevize.cz/ivysilani/kategorie/4093-spolecnost/4105-mensiny/>; Sedláková, 'Media construction of deviance – othering of Roma in television news discourse,' *Social Pathology and Prevention*, 2021, https://spp.slu.cz/artkey/spp-202102-0001_media-construction-of-deviance-8211-othering-of-roma-minority-in-television-news-discourse.php.

41 Multikulturní centrum Praha, *Menšinová média (a menšiny v médiích) v ČR*, 2006, <https://migraceonline.cz/cz/e-knihovna/mensinova-media-a-mensiny-v-mediich-v-cr>

42 L. Waschková Císařová, "I see myself as Batman: I'm doing it in the name of the local community." Addressing the complexity of the relationship between the local, the local audience and local journalists', *Local Journalism. Critical Perspective*, 2023.

43 Ibid, 2023.

The fact-finding mission of EFJ in 2019 reports: “Free independent and impartial private media (*on local level*) hardly exist as they are more or less instruments for either businessmen and oligarchs for marketing or for politicians running their campaigns. Journalists and editors gave information that regarding political news they are limited in topics they can write and tell about, which is caused especially by rising dependence of media on the money from advertisers. Some local websites are simply reduced to be media for press releases. Advertisers will block stories with a negative effect on their market and so will politicians from local authorities when it comes to their positions. Furthermore, the lack of real independent media will lock journalists to stay at such ‘marketing media’ as they won’t have any other choice. It was significant that local journalists were afraid to meet the mission as they believed that the owners could consider such a meeting as disloyalty to an extent that it could lead to dismissals.”⁴⁴

Best practices and open public sphere

At the local level, there are only very few local media organisations innovating.⁴⁵ There are exceptions, which try to actively find new technology development and audience engagement.⁴⁶ At regional level the chain *Drbna.cz* is open to innovations. Last year the media house completed a project mentored by the Financial Times focused on innovations. *Drbna.cz* has its own application, which allows to turn off advertising, or contains a function “Drbni to” - the reader can send current events from the city or can write a whole article.

In 2021 a group of local journalists founded the Association of Regional Journalists, which is willing to share the knowledge with other initiatives.⁴⁷ But the organisation is struggling financially as there are no grant opportunities for capacity building.

Citizen journalism practically does not exist. If such initiatives appear they are not sustainable and usually exist only when there is a big local case and again disappear when the problem is over regardless of whether it was solved in favour of citizens or not. Such initiatives usually appear on social media, typically Facebook.

However, there is a dangerous phenomenon on social networks at the local level. Facebook groups declaring themselves as community info-sharing groups are sometimes managed by anonymous admins and discussions are moderated in a very biased way. Critical voices are deleted, some profiles expressing unwanted opinions are blocked. In addition, some Facebook pages or groups are directly administered in favour of specific political-business groups and mislead the audience by providing biased and strictly selected information, which is not always obvious to the audience. Unfortunately, this phenomenon is not yet documented or officially described.

44 EFJ and consorcium. *Fact finding mission to Czech republic*, 2019, <https://europeanjournalists.org/wp-content/uploads/2019/10/Czech-Republic-fact-finding-mission.pdf>

45 L. Waschková Císařová, ‘We Were Innovators, but We Gave up: The Muted Digital Transition of Local Newspapers’, *Digital Journalism*, 2023.

46 E.g., online local outlet *Ohlasy dění na Boskovicku*, <https://ohlasy.info>, or a start-up *Apel-plzen.cz*.

47 J. Jetmar, ‘Regionální novináři zakládají vlastní asociaci’, *Mediář*, 2021, <https://www.mediar.cz/regionalni-novinari-zakladaji-vlastni-asociaci/>.



Denmark

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Context

In the 2022-2025 Media Agreement,¹ the Danish government acknowledges the growing issue of local news decline. To address this, funding is redirected from national news outlets to local media. Despite this initiative, there is a lack of substantial debate among politicians, journalists, and intellectuals regarding the current state and future of local journalism and the potential risks of news deserts. However, a 2021 report "Det Sander Til: Sådan undgår vi Nyhedsørkener i Danmark"² (How To Avoid News Deserts in Denmark), by journalist Anders C. Østerby indicates that while news deserts are not yet prevalent in Denmark, there is a discernible trend in that direction in some regions, signalling a cause for concern. Despite efforts to address the question of news deserts, the issue has not gained significant attention in the public debate or Danish media research beyond Østerby's report. The research that forms the basis of this report is overall consistent with the findings of Østerby.

In a Danish context, local media refers to outlets serving specific geographic areas, encompassing print newspapers, online platforms, radio, television, and social media. These outlets focus on providing relevant news, information, and entertainment tailored to local communities. Community media, owned or operated by specific communities, serves the interests and needs of distinct groups, manifesting in various forms such as print and online news, radio, television, podcasts, and social media.

Examining the correlation between potential news deserts,³ economic performance,⁴ and internet penetration,⁵ there is no apparent link between news deserts and regions experiencing lower economic performance. Similarly, no connection is observed between news deserts and reduced internet access in these areas. This lack of correlation emphasises the intricate interplay of factors influencing news deserts, economic well-being, and internet availability, underscoring the need for nuanced considerations when addressing information gaps, economic disparities, and digital connectivity in diverse regions.

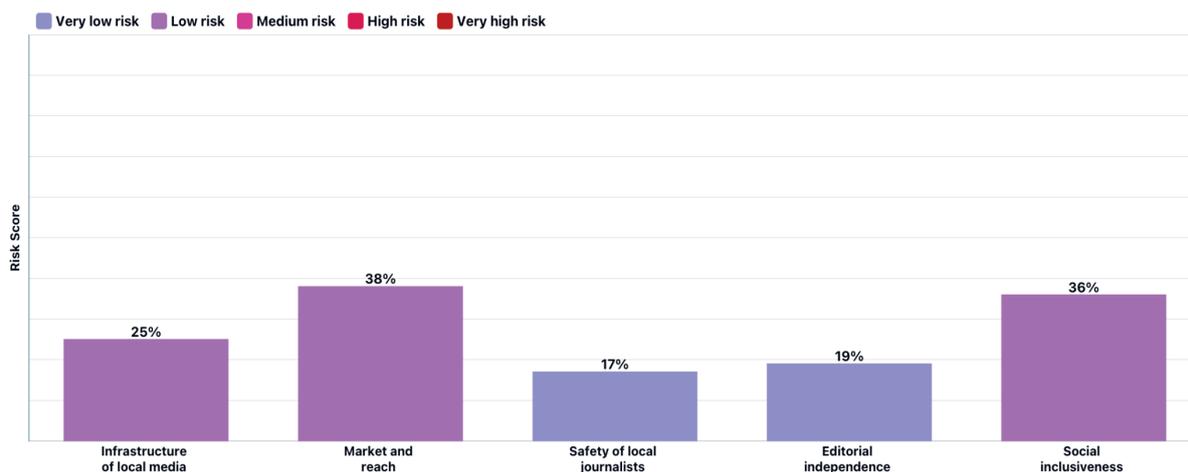
1 Danish Ministry of Culture, The Danish Media Agreement 2022 – 2025, 2022, https://kum.dk/fileadmin/_kum/2_Kulturomraader/Medier/medieaftaler/2022-2025/Medieaftale_for_2022-2025_Den_demokratiske_samtale_skal_styrkes_21maj.pdf.

2 A. C. Østerby, Det Sander Til: Sådan undgår vi nyhedsørkener i Danmark, 2021, https://www.sdu.dk/da/om_sdu/institutter_centre/c_journalistik/om-center-for-journalistik/fyens-stiftstidendes-fellowship/2020.

3 A.C. Østerby, 2021

4 Statistics Denmark, Regionalfordelt nationalregnskab, 2021, <https://www.dst.dk/da/Statistik/emner/oekonomi/nationalregnskab/regionalfordelt-nationalregnskab>.

5 Agency for Data supply and Infrastructure, 2022, <https://sdfi.dk/digital-infrastruktur/tal-paa-teleomraadet>.



Granularity of infrastructure of local media - Low risk (25%)

In Denmark, both rural and suburban areas are well-served by local media outlets, primarily consisting of privately-owned local newspapers in print and online formats. National public service media, such as The Danish Broadcasting Corporation⁶ and TV2,⁷ also contribute to local coverage through departments focusing on smaller regions. Local media in rural areas, according to Østerby's 2021 report, is generally thriving, with no evidence of actual news deserts. Suburban areas primarily rely on privately-owned local newspapers, complemented by national public service media outlets with local branches, ensuring comprehensive coverage.

However, despite this overall positive outlook, there are concerning trends in the decline of local newsrooms. In October 2023, *Jysk Fynske Medier* (JFM), the second largest privately owned media group in Denmark, opted to shut down 11 out of its 53 weekly newspapers in response to challenges in the advertising market. The decision, however, will not lead to any layoffs among the commercial or editorial staff.⁸ Over a decade, from 2010 to 2020, there was a 24% reduction in local newsrooms, with the largest decline observed in Central Jutland. Additionally, the number of local journalists has decreased, reflecting a broader national trend in the decline of written news and current affairs media employees. Moreover, in 2010, there were 111 newsrooms distributed over 24 different local, daily newspapers. Ten years later, in 2020, there were a total of 84 newsrooms spread over 22 daily newspapers. This is a decrease of 27 local newsrooms or 24 percent. In other words, almost every fourth local newsroom has closed during the last 10 years. The Central Jutland region has gone from having 35 newsrooms in 2010 to 23 in 2020. 12 newsrooms have disappeared, which is the biggest drop in absolute numbers, corresponding to 34 percent of the region's daily newsrooms.⁹

Furthermore, there are generally fewer local journalists to cover the same geographical areas compared to previous years. According to The Danish Agency for Culture and Palaces,¹⁰ the media companies that primarily publish regional and local written news and current affairs employed 3,557 full-time employees in the first half of 2019, 618 fewer than in the first half of 2016, corresponding to a decline of 15 percent.¹¹

6 Danish Broadcasting Cooperation, DR: DR's hovedadresser og telefonnumre, 2023, <https://www.dr.dk/om-dr/drs-hovedadresser-og-telefonnumre>.

7 TV2, Her finder du indholdet fra TV 2s regioner, 2023, <https://play.kundeservice.tv2.dk/hc/da/articles/6351435812881-Her-finder-du-indholdet-fra-TV-2s-regioner-p%C3%A5-TV-2-Play>.

8 Media Watch, JFM lukker 11 ugeaviser og sparer etcifret millionbeløb, 2023, <https://mediawatch.dk/Medienyt/Aviser/article16547222.ece>.

9 A. C. Østerby, 2021. Det Sander Til: Sådan undgår vi nyhedsrøkener i Danmark. p. 14.

10 The Danish Agency for Culture and Palaces provides professional advice to the Minister of Culture and contributes to the implementation of the government's objectives in the field of culture.

11 Agency for Culture and Palaces, Mediernes udvikling i Danmark. Medievirksomheders beskæftigelse, 2020, p. 26, https://kum.dk/fileadmin/mediernesudvikling/2020/Medievirksomheders_beskaeftigelse.pdf

The PSM is required by the legal framework to keep local correspondents or branches, and the provision is implemented in practice, in all the country's provinces and on a consistent level of geographical granularity. The public service institutions, Danish Broadcasting Cooperation and TV2, are required by their legal framework to provide local and regional coverage for "the entire country"¹² according to the Act on radio and television business. In practice, their geographical distribution is considered adequate and sufficient, and these outlets do not rely on material obtained from news agencies. The main news agency has its only venue and all its workers based in the capital city; local areas are covered by sending correspondents on the ground only in the case of exceptional events taking place. The main news agency in Denmark, *Ritzaus Bureau*, does not have local or regional correspondents or branches on the ground.¹³ The variable measuring this issue obtained a high-risk assessment.

The map you can find at the [following link](#) refers to the number of local and regional newspapers in Denmark in 2021. The original data for this visualisation was obtained from Anders C. Østerby's report: *Det Sander Til. Sådan Undgår vi Nyhedsørkner i Danmark*, Syddansk Universitet (2021) and you can access it [here](#).

Market and reach - Low risk (38%)

In recent years, Denmark has witnessed stability or a slight decrease in local and community media revenue, aligning with the overall economic trends in the country.¹⁴ Ministry of Culture data¹⁵ reveal a decline in local media revenues from 2016 to 2019, particularly in written news and current affairs media, as well as magazines and weekly newspapers. Revenues have decreased particularly for written news and current affairs media (with -784 million DKK, -105,10 million €) and magazines and weekly newspapers (- 225 million DKK, - 30,16 million €).

The media agreement for 2019-2023 has increased subsidies for non-commercial local radio and TV, reaching DKK 45.8 million annually, up from DKK 43.8 million in the previous agreement.¹⁶ Despite a rise in closures of local media outlets in certain sectors, this has been balanced by growth in other sectors, particularly online outlets.

Between 2010 and 2020 there has been a significant reduction in local editorial offices for daily newspapers, with a 24% decrease in newsrooms. Notably, local TV and radio outlets, being largely under public service media and subsidised, have not experienced the same decline as local newspapers. The most affected region is Central Jutland. Despite these challenges, the supply distribution chain generally serves the local media market well, with stable points of sale, distribution companies, and workers. The closure or merging of 80 local weekly newspapers since 2018 is partly due to acquisitions and mergers.¹⁷ However, this has not resulted in a complete loss of coverage, as some publications have continued in different forms. Moreover, positive developments include the emergence of eight new local weekly newspapers and 63 new local web media since 2018, particularly initiated by smaller and newer publishers.¹⁸

12 Danish Ministry of Culture, 2022. Act on radio and television business, 2002/1 LSF 40, Chapters 3, 4, and 6, <https://www.retsinformation.dk/eli/ft/200212L00040>

13 Ritzau, Redaktionen, 2023, <https://ritzau.com/redaktioner/>

14 Lange, Bureauer forventer lokalavisers annonceralg vil falde yderligere i år, 2023. <https://mediawatch.dk/Medienyt/article15189341.ece>

15 Danish Ministry of Culture, Mediernes Udvikling, 2021, https://kum.dk/fileadmin/_mediernesudvikling/2021/Omsaetning_og_beskaeftigelse_i_danske_medievirksomheder_-_Hovedkonklusioner.pdf

16 Danish Ministry of Culture, The Danish Media Agreement 2022 – 2025, 2023, https://kum.dk/fileadmin/_kum/2_Kulturomraader/Medier/medieaftaler/2022-2025/Medieaftale_for_2022-2025_Den_demokratiske_samtale_skal_styrkes_21maj.pdf

17 P. Fahlström, Analyse: Hvad sker der egentlig på markedet for lokale medier? 2020, <https://www.medietrends.dk/2020/05/12/analyse-hvad-sker-der-egentlig-paa-markedet-for-lokale-medier/>.

18 *ibid.*

The variable measuring ownership concentration, however, received a high-risk score, as there are areas where a range of major media outlets own local media outlets. A case of example is Jyllands-Postens Lokalaviser A/S is a Danish newspaper publisher based in Aarhus that publishes 12 local newspapers in East Jutland. Also, in terms of local TV news, the ownership concentration is high, as the only providers of local news are the Danish Broadcasting Corporation and TV2 which has local branches.

Although there has been a net decrease of 57 local weekly newspapers in the past three years, the emergence of new web media and government support, as outlined in the 2022-2025 Media Agreement, suggests a nuanced landscape. Stability in the number of publishers, distributors, and retailers, along with favourable government support and business conditions, contributes to sustaining local media outlets. The government's financial backing, including a pool for promoting local journalism and increased subsidies, indicates recognition of the crucial role played by local media in citizen engagement and local democracy. While commercial advertising revenue has declined, mainly affecting print media, government support ensures stability and viability for local media outlets.

In some media sectors, however, there is a very low percentage of people who are willing to pay for local news.^{19 20} In fact, the variable measuring whether audiences are willing to pay for local news, obtained a high-risk assessment. While local news on TV and radio is heavily subsidised by the state through the public service institutions, and since there is no public criticism or even debate regarding these issues, it can be argued that many people are indeed willing to pay for local news through taxes. Most people do expect written journalism (print as well as digital) to be freely available and financed through advertising, they are not willing to pay via subscription-based models, pay-per-article models, newsstand sales, voluntary donations, crowdfunding, or other methods.²¹

Safety of local journalists - Very low risk (17%)

In Denmark, journalists working for local media outlets benefit from excellent working conditions, supported by robust labour and social security legislation that ensures minimum pay rates, efficient representation through journalists' unions, and regulations governing both open-ended and temporary contracts.²² The termination of contractual relationships, including dismissal procedures, is governed by legislation, and provision for unemployment benefits and maternity or parental leave contributes to a favourable working environment.²³ The average pay for journalists in local media outlets is comparatively high in comparison to other European countries.²⁴ The employment protection afforded by unions and social security benefits in the event of unemployment enhances the overall social conditions of their work. For freelancers or self-employed journalists, remuneration aligns with the country's average salary, and they are entitled to certain labour and social security protections, including unemployment and pension schemes. The salaries of freelance journalists are generally consistent with those in permanent employment, and freelancers enjoy access to social security protection.²⁵

19 Statistics Denmark, Statistikdokumentation for Kulturvaneundersøgelsen 2021, 2022, <https://www.dst.dk/da/Statistik/dokumentation/statistikdokumentation/kulturvaneundersogelsen>.

20 A. Andreassen, Medieforsker: Danskere tror, journalistik skal være gratis 2020, <https://journalisten.dk/medieforsker-danskere-tror-journalistik-skal-vaere-gratis/>.

21 M. Mikkelsen, Stor generationskløft: Danske unge vil ikke betale for nyheder, 2022, <https://www.kristeligt-dagblad.dk/kultur/stor-generationskloeft-danske-unge-vil-ikke-betale-nyheder>.

22 K. C. Schrøder, M. Blach-Ørsten and M. K. Eberhols, Reuters Institute Digital News Report: Denmark, 2022, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/denmark>.

23 Danish Association of Journalists, Overenskomst, 2023, <https://journalistforbundet.dk/arbejdsplads/konsulentklubben-i-dansk-journalistforbund>.

24 Journalisten.dk, A. S. Jørgensen, Se tallene: Her tjener DJ's medlemmer mest og mindst, 2021, <https://journalisten.dk/se-tallene-her-tjener-djs-medlemmer-mest-og-mindst/>

25 Danish Association of Journalists, Overenskomst, 2023, <https://journalistforbundet.dk/arbejdsplads/konsulentklubben-i-dansk-journalistforbund>.

Despite an incident in 2022 involving a local journalist, where a bucket of water was thrown, direct physical attacks on local journalists have been rare and perpetrators prosecuted.²⁶ However, there is a growing trend in online threats against journalists, as indicated in the Danish Association of Journalists' survey,²⁷ though the survey does not distinguish between local and national journalists.

While journalists' organisations are not much present at the local level, those at the national level effectively ensure editorial independence and uphold professional standards at the local level. Strategic Lawsuits Against Public Participation (SLAPP) cases are infrequent, and the existing anti-SLAPP legal framework is deemed effective. While SLAPP cases against local journalists in Denmark are rare, there is recognition that this trend requires attention.²⁸ Initiatives are underway to implement the European Union's anti-SLAPP directive into Danish legislation.²⁹

Editorial independence - Very low risk (19%)

The indicator Editorial independence scores a very low risk of 19%. Although there is no law explicitly prohibiting partisan control of local media through ownership means, no instances exist of politicians, political parties, or partisan groups owning major local or domestic media companies.³⁰ Initially, the Danish press operated as a politically aligned party-press, but it has evolved to become politically independent, with an emphasis on media subscribing to various ideologies (omnibus).

State subsidies, both direct and indirect, are distributed to private local media outlets in a fair and transparent manner. Clearly defined criteria ensure equitable distribution, fostering a business environment that is supportive towards local media operations.³¹ Private local media outlets receiving state subsidies are annually disclosed in the Media Council's report.³² At the same time, state advertising is not regulated, and it is not possible to locate any criteria when it comes to its distribution.

Editorial content in local media is independent from commercial influence in practice. Laws and self-regulatory instruments effectively prevent media owners and commercial entities from exerting undue influence. The Danish Press Council, through its Code of Conduct (Presseetiske Regler), emphasises the importance of truthfulness and societal relevance in journalistic reporting.³³ While these guidelines do not explicitly address commercial influence, the integrity of journalists is considered crucial, with social sanctions, such as reputational damage, acting as deterrents.

Hidden advertising is prohibited under the Law of Advertisement no. 58 of 20 January 2012³⁴ (Markedsføringsloven). Both the law and the Consumer Ombudsman guidelines mandate that advertisements be clearly perceived as such, irrespective of their form or medium. The Ombudsman's self-regulatory scheme ensures a clear separation between editorial and commercial activities, with effective implementation and potential fines for non-compliance.³⁵

26 Ritzau, Par kastede en spand vand i hovedet på journalist, 2022, <https://nyheder.tv2.dk/krimi/2022-06-22-par-kastede-en-spand-vand-i-hovedet-pa-journalist>

27 R.S. Jørgensen, FN-rapport: Tre fjerdedele af kvindelige journalister bliver chikaneret, 2021, <https://journalisten.dk/fn-rapport-tre-fjerdedel-af-kvindelige-journalister-bliver-chikaneret/>

28 B. Larsen, SLAPP snude, journalisten er ude, 2022, <https://kforum.dk/article197510k.ece>

29 The Danish Parliament, Europaudvalget, 2023, https://www.ft.dk/samling/2022/udvda/EUU/20222_EUU_M1916523.pdf

30 Freedom House, Freedom in the World: Denmark, 2022, <https://freedomhouse.org/country/denmark/freedom-world/2022>

31 Danish Ministry of Culture, Lov om Mediestøtte, 2013, https://www.retsinformation.dk/eli/ta/2013/1604#:~:text=LOV nr 1604 af 26/12/2013,-Kulturministeriet&text=§ 1.,5, som projektstøtte, jf; Danish Ministry of Culture, Mediaaftale for 2022-2025: Den demokratiske samtale skal styrkes, 2022, https://kum.dk/fileadmin/_kum/2_Kulturomraader/Medier/mediaeftaler/2022-2025/Mediaaftale_for_2022-2025_Den_demokratiske_samtale_skal_styrkes_21maj.pdf

32 Medienævnet. Medienævnets årsrapport 2022, 2023, https://slks.dk/fileadmin/user_upload/SLKS/Omraader/Medier/Medienaevnets_aarsrapporter/Medienaevnets_a_rapport_2022.pdf

33 The Danish Press Council, N.d. Press Code of Conduct, revised 2013, <https://www.pressenaevnet.dk/press-ethical-rules/>

34 Ministry of Industry, Business and Financial Affairs, Act of Advertisement no. 58 of 20. januar 2012, <https://www.retsinformation.dk/eli/ta/2013/1216>

35 The Ombudsman, N.d. The Ombudsman's Guidelines for Advertisement, <https://www.forbrugerombudsmanden.dk/media/49158/vejledning-reklameidentifikation.pdf>

Editorial content in local media overall remains independent from political influences. While there is no explicit legislation ensuring political independence, democratic culture, media norms, and non-explicit state rules guide the local media's autonomy, and no public cases could be found when it comes to a vast range of potential sources of influence. The media authority, comprising The Radio and Television Board and the Media Board, has a remit over local media, acts independently and can sanction transgressions, reinforcing editorial independence.

PSM's local branches are also independent, with transparent appointment procedures and no known instances of political interference. The law mandates the inclusion of political views on the board but does not compromise editorial autonomy (Radio and TV Act, §16).³⁶ In 2023, the Radio and Television Board strengthened its efforts with regards to local radio and television stations, despite already intensified efforts.³⁷

With regards to the diversity of content in local media, according to the most comprehensive empirical analysis in recent years,³⁸ topics in local news media are rather diverse: crime, emergencies and risks, health, education, transport, environment and planning, economy, civil society politics, sport, demography, consumption and lifestyle and more. Research shows almost a third of the articles and features are about civil society, which includes private institutions, associations (not competitive sports), libraries, culture and art, religious institutions, and media. Economic and political topics are furthermore well represented on the local media agenda according to this research study. However, in recent years there are indications that the decrease in financial resources is resulting in less critical journalism³⁹ and investigative journalism.⁴⁰

Social inclusiveness - Low risk (36%)

The public service media, the Danish Broadcasting Cooperation, is obligated to provide news in Greenlandic, a minority language, per their public service contract.⁴¹ However, there is no corresponding obligation to provide news in Arabic for another minority group, Muslim Arabs. Private media outlets rarely offer news services in minority languages, with the exception of *Nab el Danmark*, an Arabic-Danish newspaper.⁴² In fact, the variable that measures this issue obtained a high-risk assessment.

With regards to representation of minorities in PSM, in 2022, Roskilde University Lecturer Hanne Jørndrup found that while migrants constitute 14% of Denmark's population, they contribute to only 3.5% of news sources.⁴³ However, the study's scope suggests it is somewhat indicative rather than representative of Denmark's media landscape. However, Dr. Mehmet Ümit Necef expressed scepticism about such studies.⁴⁴ He argues that assumptions about minority discrimination may influence research design and findings. Dr. Necef, though not having read the specific report, emphasises the need for distinguishing the relative importance of sources in quantitative studies. Private media coverage of minorities tends to be factual-based and fair. E.g. Simonsen's PhD project found that news representation of migrants in Danish media aligns with certain socioeconomic trends, resulting in mainly factual-based and fair coverage.⁴⁵

36 The Ministry of Culture, Bekendtgørelse af lov om radio- og fjernsynsvirksomhed, 2020, <https://www.retsinformation.dk/eli/lt/2020/1350>.

37 K. Høivang, Nævn styrker særlig indsats mod lokale radio- og tv-stationer, 2023, <https://mediawatch.dk/Medienyt/article16282666.ece>.

38 F. Svith, P. Jacobsen, S. Rasmussen, L. J. Linaa Jensen, and H. Andersen, Lokal- og regionalmediers indhold, rolle og betydning i lokalområder, 2017.

39 J. Albrecht and K. Bruun-Hansen, Den kritiske lokaljournalistik er under pres her er Joy Mogensens forslag til en løsning, 2021, <https://journalisten.dk/den-kritiske-lokaljournalistik-er-under-pres-her-er-joy-mogensens-forslag-til-en-loesning/>.

40 D.Hansen, Hvorfor laver lokale medier ikke mere undersøgende journalistik?, 2022, <https://www.dmjx.dk/aktuelt/forsknings-og-udviklingsprojekt/hvorfor-laver-lokale-medier-ikke-mere-undersoegende>.

41 The Danish Broadcasting Cooperation, DR's PUBLIC SERVICE-KONTRAKT FOR 2019-2023, 2019, https://www.regeringen.dk/media/5684/dr_s_public_service-kontrakt_for_2019-2023.pdf

42 A. Bidstrup, Arabisk avis hitter i Danmark: Over 100.000 besøgende i oktober, 2020, <https://navisen.dk/blog/arabisk-avis-hitter-i-danmark-over-100-000-besoegende-i-oktober/>

43 H. Jørndrup, Dem vi stadig taler om: Etniske minoriteter i danske nyhedsmedier, 2022, Roskilde Universitet, https://rucforsk.ruc.dk/ws/portalfiles/portal/80823620/RapportMEDbilagsrapport_1_.pdf

44 S. Simonsen, Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report: Denmark, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, p. 24, <https://hdl.handle.net/1814/75719>.

45 S. Simonsen, Media Securitization: How National Media Cover Migration and its Empirical Conditions, 2022, The Hebrew University of Jerusalem, https://scholar.google.com/citations?view_op=view_citation&hl=en&user=TIBx7DkAAAAJ&citation_for_view=TIBx7DkAAAAJ:Y0pCki6q_DkC.

Prominent media outlets, including The Danish Broadcasting Corporation, are producing content for specific social groups. Since the 80s, they have produced quality content for youth, a part of their public service contract, covering topics like music, lifestyle, and dating. TV Glad, an example of a community media outlet by and for people with disabilities, covers topics like lifestyle, love, fashion, politics, gaming, and personal relationships.

Research suggests that local media meet some critical information needs, covering topics like education, health, public transport, voting procedures, budget issues, and infrastructure.⁴⁶ However, there is room for improvement, with experts emphasising the need for more critical and investigative journalism.⁴⁷ However, local and community media are noted for successfully connecting with their audience and conducting meaningful audience studies. Ejvind Hansen, lecturer in media philosophy at the Danish School of Media and Journalism, writes about the embeddedness of local journalists “living” in the local community, which gives access to completely different types of stories.⁴⁸

In general, Danish culture is characterised by high levels of trust and social solidarity, which is reflected in the relationship between local journalists and their local communities. According to a recent survey, local media outlets would be missed in all parts of the country. Overall, two out of three respondents would miss their local media outlet, but this varies in different parts of the country. 69% of Copenhageners would miss their local newspaper or its website, while the same applies to a full 75% of the people of North Jutland.⁴⁹

Best practices and open public sphere

News media organisations are exploring innovative strategies to enhance reach and audience engagement by introducing new forms of work, journalistic products, and services. The MediaTrends report, conducted by the Danish Association of Journalists, The Danish School of Media and Journalism, and the Association of Danish Media,⁵⁰ highlights the transformation of media organisations and the emergence of numerous micro-media outlets facilitated by the cost-effectiveness of creating online platforms and modest endorsements from users. Platforms such as Substack and Revue empower journalists to operate independently. Diversification of revenue sources includes paywalls, subscribers paying self-defined fees, increased microcasting due to new social media laws, membership events, commercial partnerships, product placements, redefined traditional sponsorships, and altering formats, including less frequent publishing to enhance exclusivity and perceived value. While citizen and civil society initiatives are limited in number, there are noteworthy efforts. AarhusVest.dk, a news site initiated by local citizens in Aarhus, primarily focuses on event information and local business advertisements, lacking in-depth news content.

Moreover, the media landscape sees a new centre for investigative local journalism established with funds from the Media Agreement. A dedicated sum of 15 million DKK allocated to the Danish School of Media and Journalism for 2023-2025 aims to strengthen local media by assisting them in investigating suspicions of scandals and addressing corruption, errors, and failures in the local community. This initiative is part of broader efforts to enhance the journalistic resources available to local and regional media.⁵¹

46 F. Svith, P. Jacobsen, S. Rasmussen, L. J. Linaa Jensen, and H. Andersen, Lokal- og regionalmediers indhold, rolle og betydning i lokalområder, 2017.

47 J. Albrecht and K. Bruun-Hansen, Den kritiske lokaljournalistik er under pres her er Joy Mogensens forslag til en løsning, 2021, <https://journalisten.dk/den-kritiske-lokaljournalistik-er-under-pres-her-er-joy-mogensens-forslag-til-en-loesning/>.

48 E. Hansen, Den fjerde statsmagt, 2019, <http://offentligheder.dk/at-vaere-et-landsdaekkende-medie-forudsætter-aegte-lokal-journalistik/>.

49 Association of Danish Media, Danskernes brug af nyhedsmedier: Stabil tillid og stigende betalingsvillighed, 2020, <https://danskemedier.dk/aktuelt/analyse-og-trends/danskernes-brug-af-nyhedsmedier-stabil-tillid-og-stigende-betalingsvillighed/>.

50 Birkemose, MediaTrends, 2021, <https://www.medietrends.dk/wp-content/uploads/2020/12/MEDIETRENDS-2021-PRINTVENLIG.pdf>.

51 D. Hansen, DMJX får center for graverjournalistik, 2022, <https://www.dmjx.dk/aktuelt/nyhed/dmjx-faar-center-graverjournalistik>



Estonia

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Context

“News deserts” are occasionally discussed in Estonia, which has a land area of 42,750 km (45,339 km²)¹ and a population of 1,365,884,² but they are not in a sustained focus. The issue of insufficient coverage in the outskirts arises periodically, as evidenced by an analysis conducted by the University of Tallinn.³ This discussion revolves around the closure of numerous local news outlets, exemplified by cases like *Koit* or *Meie Maa*.⁴ Some local media, such as *Hiiu Leht*, undergo changes in ownership, when acquired by businessmen or investors.

A recent study contributes to the discourse, emphasising that even regions deemed “covered by a local newsroom” may be considered news deserts.⁵ This is attributed to the fact that journalists lack the necessary resources to fulfil their professional watchdog role, a concern echoed by journalism professor Halliki Harro-Loit.⁶ Though not consistently at the forefront, these discussions shed light on the challenges within Estonia's local media landscape.

The legal framework in Estonia does not provide a specific definition for “local media” and “community media”. In practice, however, local media is commonly associated with specific regions and municipalities. Local outlets typically focus on issues of relevance for the area of their municipality or region. Community media, on the other hand, are hyperlocal outlets initiated by community members out of enthusiasm. Despite the absence of a regulatory or legislative definition, community media thrive at the local level. The hyperlocal nature of these media outlets is attributed to the size of Estonia and its distinctive communities. Given the country's population density of 31.4 people per km² ⁷ covering larger regions becomes challenging due to a lack of enthusiastic contributors and the distances between larger municipalities.

1 ‘World Bank Open Data’, *World Bank Open Data* <<https://data.worldbank.org>>

2 Estonia Statistics, ‘Avaleht | Statistikaamet’ <https://www.stat.ee/et>

3 U. Rohn et al, ‘Eesti sõltumatu kohaliku ajakirjanduse loodavad väärtused, väljakutsed ja arenguvõimalused’, 2019.

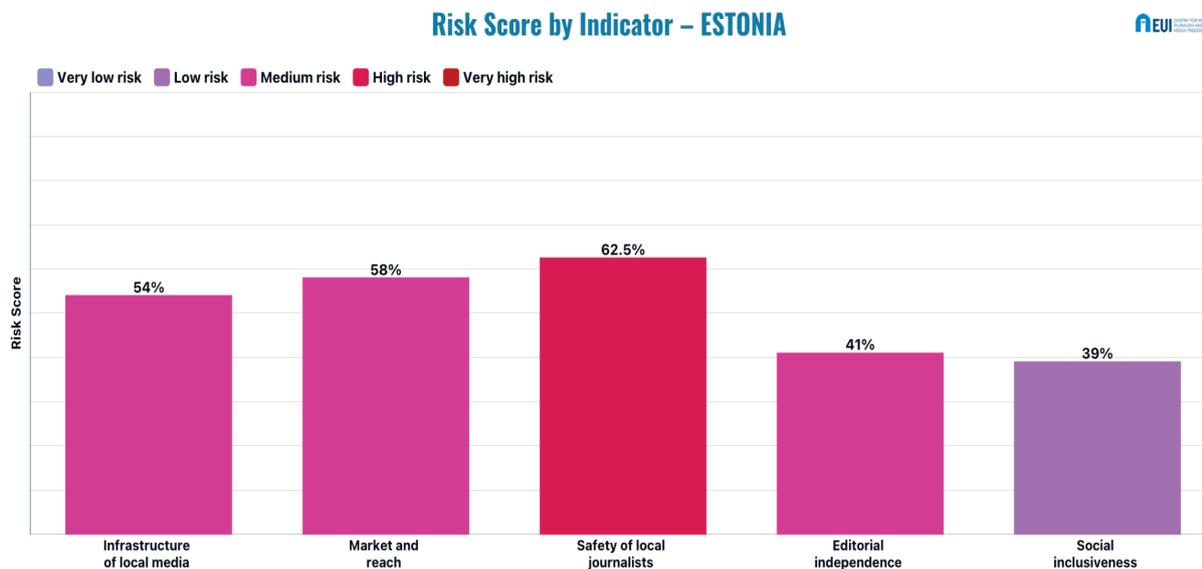
4 ‘Ajaleht Meie Maa lõpetas ilmumise: “Parem õudne lõpp, kui lõputu õudus,” ütleb lehe tegevjuht’, *Saarte Hääl*, 2022 <https://saartehaal.postimees.ee/7506255/ajaleht-meie-maa-lopetas-ilmumise-parem-oudne-lopp-kui-loputu-oudus-utleb-lehe-tegevjuht>

5 S. Ivask and L. Waschková Čísařová, ‘Locked Up: Local Newsrooms Managing a Digital Shift at the Centre of the Covid-19 Outbreak’, *Journalism Practice*, 0.0 (2023), 1–17 <https://doi.org/10.1080/17512786.2023.2266483>

6 A. Harrik, ‘Ajakirjanduse Professor: Võim Peab Ikka Ajakirjandust Natuke Kartma | Ühiskond | ERR’, 2023 <https://novaator.err.ee/1609107689/ajakirjanduse-professor-voim-peab-ikka-ajakirjandust-natuke-kartma>

7 ‘Rahvastik | Statistikaamet’ <https://www.stat.ee/et/avasta-statistikat/valdkonnad/rahvastik>

Regarding internet penetration, Estonia boasts a high rate of 92.4%.⁸ However, 92,255 people lack bandwidth connection.⁹ Notably, small islands and areas in North-East, South-West, and North-West Estonia face challenges in bandwidth connectivity.¹⁰ As data collected for this report shows, these areas are potential news deserts.



Granularity of infrastructure of local media - Medium risk (54%)

The landscape of local media, spanning television, radio, press, and their online counterparts, reflects a rich tapestry influenced by a unique historical context. However, there is a lack of local TV channels.¹¹ The radio scene is diverse, featuring stations such as *MartaFM*, *Kesk-Eesti Tre Raadio*, *Nõmme Raadio*, *Tallinna Pereraadio*, *Raadio Kadi*, *Raadio Tallinn*, *Ruut FM*, *SSS-Raadio*, *BFBS Radio*, and *BFBS Radio 2*.¹² Regarding the press, there are 151 local media outlets, encompassing citizen initiatives, local government publications, and cultural movements' information brochures, with 25 dedicated journalistic outlets contributing to the media landscape.¹³ Delving into the nuanced sphere of community media, religious stations like *Kuressaare Pereraadio*, *Narvskoje Semeinoje Radio*, *Tallinna Pereraadio*, and *Radio Eli* play integral roles.¹⁴ However, community-led initiatives, as identified by Associate Professor of Journalism Sociology (University of Tartu) Ragne Kõuts-Klemm, pose a nuanced challenge to categorisation. Entities like *Nõmme Raadio*, *SSS-Raadio*, and *Tõrva Raadio* exist in a grey area, straddling community and alternative forms of media, sometimes opposing the mainstream media and dispersing conspiracy theories.¹⁵

The print media in the community sphere features publications like *Uma Leht*, *setomaa.ee*, *Viimsi uudised*, *Peipsirannik*, *Põltsamaa Valla Sõnumid*, *läänlane*, and *Elva elu*. Notably the only local TV channel, *AloTV* in Tartu, functions solely as a music channel without information dissemination.¹⁶

Community radio faces regulatory hurdles, with temporary frequency licences available; the acquisition of a permanent frequency licence proves elusive due to a lack of adequate resources and a viable business model. Social media platforms, while hosting local conversations, lack journalistic ambition or curated editorial interventions.

8 'Eestlased Kasutavad Internetis Enim E-Mail'i Ja Internetipanka, Kasvab Ettevõtete Turvateadlikkus | Statistikaamet' <https://www.stat.ee/et/uudised/infotehnoloogia-ettevotetes-ja-leibkondades-2022>

9 E. Lauk, 'Digitaalne lõhe lairibaühenduse kättesaadavuse näitel Eestis, unpublished Bachelor's Thesis, University of Tartu, 2021.

10 'Sideteenuste Katvuse Rakendus' <https://www.netikaart.ee/tsaApp/>

11 'NETI: /INFO JA MEEDIA/Ajalehed/Kohalikud' https://www.neti.ee/cgi-bin/teema/INFO_JA_MEEDIA/Ajalehed/Kohalikud/

12 'NETI: /INFO JA MEEDIA/Ajalehed/Kohalikud'.

13 S. Ivask and L. Waschková Čísařová, 2023.

14 'NETI: /INFO JA MEEDIA/Ajalehed/Kohalikud'.

15 Ragne Kõuts-Klemm, Associate professor of Journalism Sociology (University of Tartu, Estonia), face-to-face interview on Local Media in Estonia, 9.10.2023.

16 'NETI: /INFO JA MEEDIA/Ajalehed/Kohalikud'.

Moving away from bigger towns in Estonia, to rural areas, local media outlets exist, but their distribution faces challenges, including a decreasing number of selling points¹⁷ and low internet penetration.¹⁸ Rural areas are prevalent on both the islands and the mainland of Estonia, for example, in Northern-Western Estonia or certain areas within the Western regions, but they can also be found in the middle of Estonia as well as in the Eastern parts (e.g., the coast of lake Peipsi). These areas exhibit a strong correlation with the local populace and are positioned distantly from larger municipalities or cities, lacking shops and kiosks in the area. Suburban and urban areas also show medium-risk scenarios, with limited diversity in local media outlets.¹⁹

Common forms of local media include print and online, but the overall risk level suggests potential gaps in coverage. In the last five years, there has been a medium-risk decline in the number of local journalists, particularly those based in rural or small urban areas.²⁰ This trend may impact the coverage of local communities and events.

The Public Service Media (PSM) - ERR (*Eesti rahvusringhääling*) maintains a stable network of local correspondents or branches, ensuring widespread coverage.²¹ However, the main news agency BNS²² poses a higher risk, as it operates primarily from the capital city.

Market and reach – Medium risk (58%)

In certain regions, community outlets primarily serve as advertising mediums, playing a minimal journalistic role. This further complicates the assessment of advertising revenues within the media sector. Adding to this lack of clarity is the absence of a clearly defined community media sector, which hinders discussions on advertising revenue trends. Therefore, there is a pressing need for a more nuanced understanding of the media landscape in this unique context.²³

Estonia's local media revenue landscape is characterised by medium risk, indicating a delicate balance between stabilisation and decline. Ragne Kõuts-Klemm's²⁴ research underscores the impact of changing ICT dynamics and digitalisation requirements on independent news outlets, exacerbating financial constraints. Despite national-level revenue stability, local outlets face unique challenges, emphasising the nuanced nature of the economic landscape.

A high-risk trend emerges with a significant increase in closures of local media outlets, particularly in the print sector²⁵. However, the surge in online outlets offers a partial offset to this trend. Print media, being the primary local journalism platform in Estonia, bears the brunt of closures, underscoring the need for adaptive strategies.²⁶

The medium-risk assessment of the supply distribution chain underlines adequacy in certain sectors but exposes vulnerability in others. Concerns over decreasing points of sale, distribution companies, and workers, especially in rural areas, reflect challenges in ensuring timely newspaper delivery.²⁷

17 Ragne Kõuts-Klemm, face-to-face interview, 9.10.2023.

18 'Sideteenuste Katvuse Rakendus'.

19 U. Rohn et al., 2019.

20 S. Ivask and L. Waschková Císařová, 2023.

21 'Korrespondendid | Korrespondendid | ERR' <https://info.err.ee/988701/korrespondendid>

22 'BNS Cover Contacts' https://www.bns.ee/en/contacts_en.html

23 Ragne Kõuts-Klemm, Associate professor of Journalism Sociology (University of Tartu, Estonia), face-to-face interview on Local Media in Estonia, 9.10.2023.

24 *Meediapoliitika Olukorra Ja Arengusuundade Uuring*, ed. by Ragne Kõuts-Klemm and others (Tartu : Tallinn: Tartu Ülikooli ühiskonnateaduste instituut ; Tallinna Ülikool, 2019).

25 'Põlvamaa ajaleht Koit lõpetab juulist ilmumise', *Uudised*, 2019 <https://lounapostimees.postimees.ee/6562732/polvamaa-ajaleht-koit-lopetab-juulist-ilnumise>

26 S. Ivask and L. Waschková Císařová, 2023.

27 Lauri Habakuk, Local journalist of Pärnu Postimees (Estonia), face-to-face interview on Local Media in Estonia, 5.10.2023.

Ragne Kõuts-Klemm's assessment underscores a challenge in defining community media in Estonia. Despite the presence of community-led outlets, they fall short of meeting the criteria due to the lack of a sustainable business model and adequate financing. Attempts to establish community publications have been short-lived, hindered by financial constraints. For instance, publications like *Setomaa* or *Uma Leht*, sustained by state support through *SA Kultuurileht*, do not align precisely with the community media definition, which typically requires independence from state-provided support.²⁸

Regarding government financial support, there is a partial agreement on sufficiency, acknowledging measures like VAT reduction, home delivery grants, and COVID-19 crisis funds.²⁹ However, concerns persist due to irregular provision and anticipated changes in VAT rates.³⁰ Notably, the support predominantly benefits print journalism, leaving gaps in support for TV and radio, underscoring potential imbalances.

The medium-risk assessment regarding the situation for commercial advertisement revenue recognises a decline in specific sectors, aligning with broader economic trends. Ragne Kõuts-Klemm³¹ underscores the formidable challenges posed by global internet giants, diverting advertising revenue away from local media outlets. The scenario calls for strategic adaptations in response to changing advertising dynamics.

Insufficient data on community media outlets leads to challenges in assessing trends and financial support. According to Ragne Kõuts-Klemm,³² Estonia lacks community media per se, with limited sustained outlets. The absence of a defined business model and financing hampers community media's growth. This gap is notable in the absence of diversified voices in the local media landscape.

Ownership concentration poses a very high risk, with *Eesti Meedia* affiliation covering a significant portion of local outlets, influencing the largest municipalities.³³ While some outlets, like *Pärnu Postimees*,³⁴ maintain autonomy, the overarching influence raises concerns about diverse media ownership.

Regarding audience willingness to pay for local news, a medium-risk assessment indicates disparities across sectors. Subscription-based models for print and larger online outlets show promise, with growing willingness to pay for digital content.³⁵ However, challenges persist, especially for TV and radio, which largely operate on a free model.

The existence and effectiveness of funds for innovation was scored high risk, signalling challenges in accessing resources for local newsrooms. While public funds from the European Commission are available, the application process poses barriers.³⁶ Smaller newsrooms without extensive project presentation skills face difficulties accessing these grants.

Finally, the lack of data on local media's audiences (as it is considered a trade secret) prevents a comprehensive analysis of the related recent trends.

28 Ragne Kõuts-Klemm, face-to-face interview, 9.10.2023.

29 Väino Koorberg, Estonian journalism expert, E-mail exchange on Local Media in Estonia, 9.10.2023.

30 'Meedialiidu juht: ajakirjanduse käibemaks nulli!', *Äripäev* <https://www.aripaev.ee/arvamused/2021/12/09/meedialiidu-juht-ajakirjanduse-kaibemaks-nulli>

31 Ragne Kõuts-Klemm, face-to-face interview, 9.10.2023.

32 Ragne Kõuts-Klemm, face-to-face interview, 9.10.2023.

33 'Margus Linnamae to Become Sole Owner of Eesti Meedia', *Estonian News*, 2015 <https://news.postimees.ee/3307051/margus-linnamae-to-become-sole-owner-of-eesti-meedia>

34 Lauri Habakuk, Local journalist of Pärnu Postimees (Estonia), face-to-face interview on Local Media in Estonia, 5.10.2023.

35 Lauri Habakuk, Local journalist of Pärnu Postimees (Estonia), face-to-face interview on Local Media in Estonia, 5.10.2023.

36 Anonymous editor in Estonian Local outlet, face-to-face interview on Opportunities of Local Media, 2021.

Safety of local journalists – High risk (62.5%)

In evaluating the working conditions of journalists in local media outlets, this report relies on the author's research.³⁷ The overall assessment indicates a medium risk level, reflecting generally acceptable conditions. The consistency in working conditions between regional and national journalists is acknowledged,³⁸ with some variations observed among less successful local outlets. Changes in the hiring systems, such as reliance on freelancers, raise concerns as freelancing lacks social security benefits, leaving journalists responsible for their own well-being.³⁹ Some newsrooms offer psychological counselling and additional health insurance, while others provide perks like lunch discounts, albeit not universally.⁴⁰

For freelancers or self-employed journalists, the evaluation indicates a high-risk scenario. The remuneration for freelancers is often below the country's average salary, and they lack social security protection⁴¹. Establishing a company requires meeting minimum salary levels, which presents financial challenges. Former freelancer Tiina Kaukvere emphasises the struggle for a stable income, with monthly earnings fluctuating significantly. The social tax structure adds complexity, making access to social benefits contingent on paying specific amounts to the tax office.⁴²

Concerning physical safety, the assessment suggests a medium risk, with occasional attacks and threats, particularly online.⁴³ The COVID-19 outbreak highlighted safety equipment shortages,⁴⁴ impacting local journalists. Instances of online hostilities are on the rise, posing challenges, especially for younger and less experienced journalists. The legal framework to prosecute perpetrators is in place but may not be entirely effective, with limitations noted in protecting journalists from SLAPP cases and online hostility.⁴⁵

The presence and effectiveness of journalists' organisations at the local level are deemed to be at very high risk. Critical perspectives, including those from practitioners, highlight scepticism toward existing associations.⁴⁶ The lack of clear actions and trustworthiness raises concerns, and meetings predominantly occur in larger cities, leaving many local journalists isolated.

Professional standards are identified to be at medium risk. Larger local news outlets are generally committed to ethical journalism, adhering to codes of conduct.⁴⁷ Smaller regional outlets may not consistently follow professional standards, sometimes disseminating unedited information from local governments without performing a watchdog role.⁴⁸

Overall, the comprehensive assessment highlights nuanced challenges in Estonia's local media landscape, emphasising the need for targeted interventions to address poor working conditions, safety concerns, organisational support, adherence to professional standards, and legal protections for journalists.

37 S. Ivask and A. Lon, "‘You Can Run, but You Cannot Hide!’ Mapping Journalists' Experiences With Hostility in Personal, Organizational, and Professional Domains", *Journalism & Mass Communication Educator*, 78.2 (2023), 199–213 <https://doi.org/10.1177/10776958231151302>

38 Lauri Habakuk, Local journalist of *Pärnu Postimees* (Estonia), face-to-face interview on Local Media in Estonia, 5.10.2023.; Raul Vinni, Local journalist of *Hiiu Leht* (Estonia), face-to-face interview on Local Media in Estonia, 6.10.2023; Väino Koorberg, Estonian journalism expert, E-mail exchange on Local Media in Estonia, 9.10.2023; Ragne Kõuts-Klemm, Associate professor of Journalism Sociology (University of Tartu, Estonia), face-to-face interview on Local Media in Estonia, 9.10.2023.

39 'Law of Obligations Act–Riigi Teataja' <https://www.riigiteataja.ee/en/eli/506112013011/consolide>

40 Väino Koorberg, Estonian journalism expert, E-mail exchange on Local Media in Estonia, 9.10.2023.

41 Tiina Kaukvere, Freelance journalist in Estonia, face-to-face interview on freelancing in Estonia, 5.10.2023; Väino Koorberg, Estonian journalism expert, E-mail exchange on Local Media in Estonia, 9.10.2023.

42 Tiina Kaukvere, Freelance journalist in Estonia, face-to-face interview on freelancing in Estonia, 5.10.2023.

43 S. Ivask, L. Waschková Císařová and A. Lon, "‘When Can I Get Angry?’ Journalists' Coping Strategies and Emotional Management in Hostile Situations", *Journalism*, 2023 <https://journals.sagepub.com/doi/10.1177/14648849231199895>

44 S. Ivask and L. Waschková Císařová, 2023.

45 Lauri Habakuk, Local journalist of *Pärnu Postimees* (Estonia), face-to-face interview on Local Media in Estonia, 5.10.2023.

46 Raul Vinni, Local journalist of *Hiiu Leht* (Estonia), face-to-face interview on Local Media in Estonia, 6.10.2023.

47 Bruno Lill, 'Liikmed', *Eesti Meediaettevõtete Liit*, 2023 <https://meedialiit.ee/liikmed/>

48 S. Ivask and L. Waschková Císařová, 2023.

Editorial independence – Medium risk (41%)

In Estonia, there is no regulation preventing political control of the media through direct or indirect ownership. This results in cases where political control is evident, prompting a medium-risk evaluation of this specific indicator. In an interview conducted for this study, Associate Professor Ragne Kõuts-Klemm discussed the cases of *Vooremaa* (owned by politician Aivar Kokk), *Tre radio* (owned by politician Siim Pohlak), and *Postimees* (a national news outlet, which also owns local outlets; the extent of political influence is still undetermined).⁴⁹ At the same time, political party media are considered as a separate phenomenon, not adhering to journalistic criteria, and publicly disclosed in the business register.

Regarding state subsidies to private local media, the risk is considered low. Media expert and experienced editor-in-chief Väino Koorberg, outlined the presence of various types of subsidies, including VAT exemptions, home delivery support, and unemployment fund wage compensation. The distribution of grants for Russian-language news outlets is deemed fair and transparent, with explanations provided by recipients.⁵⁰

Advertising by the state is limited to the dissemination of crucial information during crises, and only in public broadcasting, where a legal obligation to broadcast official announcements of constitutional state bodies, maintaining transparency, is in place.⁵¹ At the same time, state-owned companies can advertise themselves in other channels, including in local media. However, no data could be found regarding the distribution of advertising by state-owned enterprises.

The independence of local media editorial content from commercial influence is assessed as medium-risk. While Estonia has a code of ethics for journalists and self-regulatory institutions, not all outlets, especially small regional ones, have signed it.⁵² Laws exist to prevent misleading advertisements, and public broadcasting cannot show commercial advertisements.⁵³

The independence of local media from political influence is also medium-risk: while there is a code of ethics, there are some cases where politics is very close, and signs of interference are observed. Still, local media is generally considered independent, with efforts made to keep politics out of editorial offices.⁵⁴

In Estonia there is no general media authority as such. The Consumer Protection and Technical Monitoring Authority⁵⁵ (TTJA) regulates the audio-visual media sector, but their competencies do not extend to print and online media. These authorities have a remit over local media, and their actions do not raise elements of concern, prompting a low-risk evaluation.⁵⁶

The Estonian PSM *ERR* does not have local branches, but rely on correspondents displaced at the local level. In terms of independence, its Board consists of politicians or politically motivated individuals⁵⁷, allowing for occasional interference. The budget dependency on the government and parliament also raises concerns.⁵⁸

Experts perceive the content diversity in local media as moderate. Observers point out a tendency towards "comfort zone" reporting, where journalists tend to steer clear of conflict with local leaders⁵⁹.

49 Ragne Kõuts-Klemm, face-to-face interview, 9.10.2023.

50 Väino Koorberg, Estonian journalism expert, E-mail exchange on Local Media in Estonia, 9.10.2023.

51 'Ringhäälinguseadus–Riigi Teataja' <https://www.riigiteataja.ee/akt/831359>

52 Bruno Lill, 'Liikmed', *Eesti Meediaettevõtete Liit*, 2023 <https://meedialiit.ee/liikmed/>

53 'Consumer Protection Act' <https://www.riigiteataja.ee/en/eli/521012014011/consolide>

54 Ragne Kõuts-Klemm, face-to-face interview, 9.10.2023.

55 'Private Client | Consumer Protection and Technical Regulatory Authority' <https://ttja.ee/en>

56 However, it is worth noticing that TTJA operates under the governance of Economic Affairs and Communications

57 Eesti Rahvusringhäälingu Nõukogu | Juhtimine | ERR <https://info.err.ee/981730/eesti-rahvusringhaalingu-noukogu>

58 ERR | ERR, 'Budget 2024: Who Gets What?', *ERR*, 2023 <https://news.err.ee/1609117022/budget-2024-who-gets-what>

59 Editor in Estonian Local outlet, face-to-face interview on Opportunities of Local Media, 2021; Raul Vinni, Local journalist of Hiiu Leht (Estonia), face-to-face interview on Local Media in Estonia, 6.10.2023

Social inclusiveness – Low risk (39%)

The risk associated with PSM broadcasting in minority languages is considered medium. The Broadcasting Law mandates contributions to the preservation and development of the Estonian nation, language, and culture⁶⁰. While there is no specific regulation about broadcasting in other languages, the government supports the development of Russian-language outlets and programmes⁶¹. Russian is the primary focus, with the dedicated TV channel *ETV+* and *Raadio4* under the PSM, along with *news.err.ee* providing Estonian news in English. However, languages like Finnish and Ukrainian are not covered.

The representation of minorities in PSM's news reporting is deemed low risk. The PSM is praised for precise, factual coverage, and there is a high level of trust among the audience.⁶² An ethics counsellor oversees the coverage.⁶³

Private media outlets, as assessed, pose a low risk in offering news services in minority languages. Russian-language journalism is actively developed, and there are also Finnish-language and Ukrainian news services.⁶⁴

The representation of minorities in news reporting by private media outlets is assessed as very low risk. Ukrainians and Russians in Estonia receive substantial coverage, with factual reporting in national dailies and TV shows.⁶⁵ The Press Councils oversee accuracy.⁶⁶

There are no available data on the question of outlets or channels addressing marginalised groups (e.g. women, youth, elderly, people with disabilities); according to Ragne Kõuts-Klemm,⁶⁷ there are no specific outlets in Estonia targeting marginalised groups. The PSM has focused on providing news accessibility for people with hearing disabilities.

Regarding the provision of sufficient public interest news by local media, the risk is assessed as medium. Some local media outlets may prioritise softer topics or avoid conflict-related issues due to business-related pressures, such as external influences or the pursuit of higher online engagement.⁶⁸

Media experts say that the extent to which local media outlets engage with their audience and local communities is moderate. Estonian local journalists are closely connected to the communities they serve, often engaging in direct communication. However, interaction fluctuates, and audience research is infrequently conducted due to resource constraints.⁶⁹ Despite this, trust in Estonian journalism remains high, with over half of the population relying on the media for information.⁷⁰

Best practices and open public sphere

The landscape of news media organisations reveals a medium risk level of experimentation with innovative responses to improve reach and audience engagement. Several newsrooms are undergoing a process of digitalisation, incorporating remote work for journalists, integrating artificial intelligence (AI) into their workflows, and exploring new journalistic products, such as long reads with audio and audio-visual elements. Social media storytelling and the implementation of new business models, including paywalls, are also

60 'Ringhäälinguseadus-Riigi Teataja'.

61 'Riik Toetab Eesti Venekeelset Erameediat Miljoni Euroga' <https://www.postimees.ee/7721173/riik-toetab-eesti-venekeelset-erameediat-miljoni-euroga>

62 ERR | ERR, 'Survey: Trust in Estonian Media Growing', ERR, 2022 <https://news.err.ee/1608540526/survey-trust-in-estonian-media-growing>

63 'Eetikanounik | ERR' <https://info.err.ee/k/eetikanounik>

64 'Естонська продукція потрапила в Україну', *Україна*, 2022 <https://ukraina.postimees.ee/7471463/estonska-produkciya-potrapila-v-ukrajinu>

65 Väino Koorberg, Estonian journalism expert, E-mail exchange on Local Media in Estonia, 9.10.2023.

66 Bruno Lill, 'Pressinõukogu', *Eesti Meediaettevõtete Liit*, 2023 <https://meedialiit.ee/pressinoukogu/>

67 Ragne Kõuts-Klemm, Associate professor of Journalism Sociology (University of Tartu, Estonia), face-to-face interview on Local Media in Estonia, 9.10.2023.

68 S. and L. Waschková Císařová, 2023.

69 S. Ivask and L. Waschková Císařová, 2023.

70 'Uuringud | Riigikantselei' https://www.riigikantselei.ee/uuringud?view_instance=0¤t_page=1

observed in certain local newsrooms.⁷¹ News media in Estonia are actively seeking ways to understand their audience better and tailor content based on audience metrics. Notable attempts at innovation include *Ekspress Group's* conference, where journalists shared their stories, aiming to bring journalistic work closer to the audience. *Levila*, in particular, is acknowledged for efforts to break out of the elitism trap, creating repetitive stories for the community and extending its presence beyond Tallinn. However, significant success stories in terms of experimentation are limited, with relatively little ground-breaking exploration occurring, especially at the local media level.⁷²

There is a lack of citizen or civil society initiatives addressing the decline of local and community news provision. The only notable effort mentioned is that of the Journalists' Association, which is advocating for the recognition of journalism as a creative industry, aiming to secure more funds. Despite their focus on this matter, they have not yet succeeded in making it a reality.

71 S. Ivask and L. Waschková Císařová, 2023.

72 Ragne Kõuts-Klemm, face-to-face interview, 9.10.2023.



Finland

Carl-Gustav Lindén, University of Bergen, Norway

Mikko Grönlund, University of Turku, Finland

Context

Finland has one of the EU's most robust media systems despite its relatively large size and small population. It ranks number 5 out of 180 countries on the press freedom list and attempts by politicians to influence media content are rare and not tolerated.¹ The foundation of the Finnish news landscape lies in highly professionalised and independent journalism, an arm's-length principle in media policy, institutionally strong public service media and commercial newspapers, bolstered by a dynamic local press. According to Nielsen,² local and regional media play an important role in the media ecosystems. In this respect, Finland is no exception and regional newspapers, supplemented by a diverse local press, can be characterised as key or keystone media. However, the commercial news media rely heavily on advertising revenue from their printed editions, rendering them sensitive to advertising volume and targeting.³

Although, Finland still houses a considerable number of print newspapers, both the variety of titles and their circulation have dwindled since the early 1990s. Consequently, concerns arise regarding people's access to local news, posing risks to diversity.⁴ Concurrently, emerging social media groups, notably on platforms like Facebook, and hyperlocal initiatives offer online news or content tailored to specific communities.⁵

Yle, the public service media company, stands as another keystone in the media ecosystem. Yle boasts a network of 31 regional news offices across Finland: 25 serving Finnish-speaking audiences, 8 catering to Swedish speakers, and two dedicated to the Sámi community.

Presently, there are a little over 50 commercial radio channels operating in Finland. State owned media is absent.

1 Reporters Without Borders: Country Report: Finland, 2023, <https://rsf.org/en/country/finland>

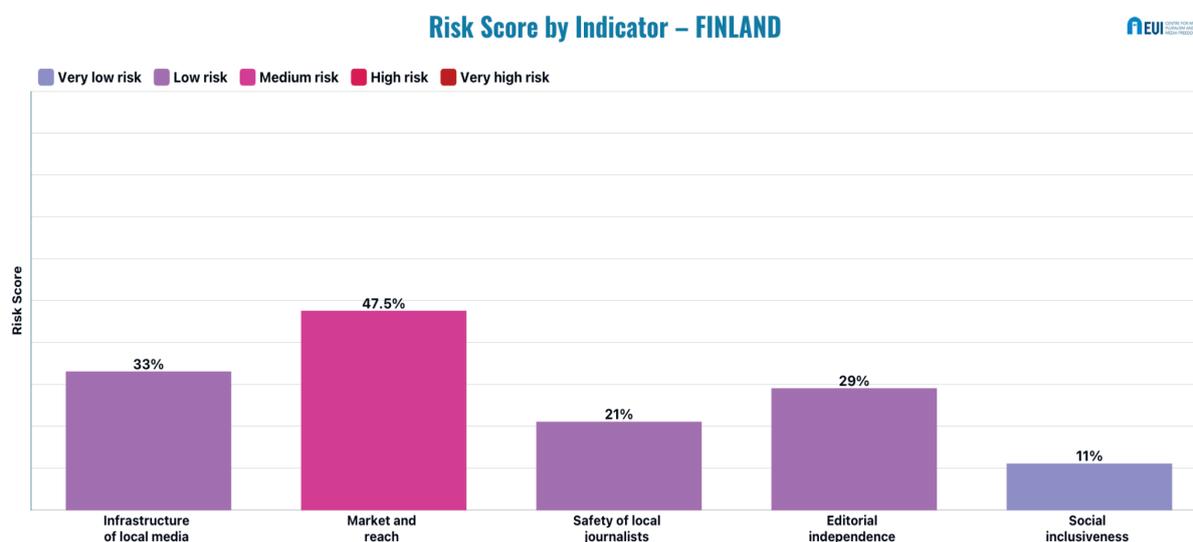
2 R. K. Nielsen, Local Newspapers as Keystone Media: The Increased Importance of Diminished Newspapers for Local Political Information Environments, 2015, pp. 51-72 in R. K. Nielsen (ed.) Local Journalism. The Decline of Newspapers and the Rise of Digital Media. London/New York: I.B.Tauris.

3 M. Ala-Fossi, M. Grönlund, H. Hellman and K. Lehtisaari, Media and Communication Policy Monitoring report 2019, 2020, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162144/LVM_2020_04.pdf?sequence=1&isAllowed=y

4 M. Ala-Fossi, A. Alén-Savikko, M. Grönlund, P. Haara and H. Hellman, The state of media- and communications policy and how to measure it Final report, 2018, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/160714/04_18_Media- ja-viestintapolitiikan-nykytila.pdf?sequence=1&isAllowed=y

5 J. Hujanen, M. Grönlund, J. Ruotsalainen, K. Lehtisaari and V. Vaarala, The ethics of journalism challenged The blurring boundary between local journalism and communications, *Journalistica*, 2022, pp. 1-25

Community media do not legally exist. In 2008, the European Parliament approved a resolution, where member states were recommended to legalise community media and to set up a funding mechanism for non-profit citizen media. However, in terms of legal status, community media are not recognised in Finland or in nine other member states.⁶⁷ However, hyperlocal media, i.e. initiatives that offer an online news, communication or content service pertaining to a small community such as a village or neighbourhood, is a small feature of the Finnish media ecosystem and mainly consists of around 30 hyperlocal media outlets⁸ as well as a few small hobbyist television stations, mainly focused on the Swedish speaking population in Ostrobothnia. The highest risk based on the bar chart below is for the Market and reach indicator.



Granularity of infrastructure of local media- Low risk (33%)

While there is a rich offering of media content in Finland, in recent years there has been talk of news deserts from time to time, for instance feelings expressed by journalists, fearing the shutdown of newsrooms and the loss of workplaces.⁹ However, among policymakers, industry professionals and the public the threat has not been recognised as a problem or discussed regularly. News Media Finland, a trade association for newspaper publishers, has clarified the matter. They found that almost all of the 309 municipalities in mainland Finland are covered by newspapers or other media such as public service. Most Finnish municipalities (94%) belong to an area covered by a local or city newspaper. Only 18 municipalities remain outside media coverage. According to the assessment, some regional or provincial newspapers do cover these municipalities as well, albeit maybe not on a regular basis. So, according to this information there are no completely white spots in journalism on the map.¹⁰ However, looking at the home locations of the 14,000 journalists who are members of the Union of Journalists in Finland, there are 61 municipalities out of 309 where no journalist lives and another 57 municipalities with only one residing journalist.¹¹ The areas most populated by journalists can be found in the Helsinki region. One can of course at the same time argue that municipalities where none or only one journalist lives (40%) are also locations with a very small population.

6 M. Nermes, Yhteisömedia: Yli 40 vuotta kansalaisviestintää Suomessakin. Turku: Nomerta, 2013, <https://kansalaisareena.fi/wp-content/uploads/2016/10/YhteisömediakirjaNermes2013NomertaSelailukappale.pdf>.

7 K. Bleyer-Simon, E. Brogi, R. Carlini, D. Da Costa Leite Borges, I. Nenadic, M. Palmer, P. L. Parcu, M. Trevisan, S. Verza, and M. Zuffova, Monitoring Media Pluralism In The Digital Era, Application of the Media Pluralism Monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022, 2023, Centre for Media Pluralism and Media Freedom, European University Institute.

8 J. Hujanen, K. Lehtisaari; C. Lindén and M. Grönlund, Emerging forms of hyperlocal media. Nordicom Review, 2019. 40(s2), 101-114.

9 J. Räninä, Mitä seuraa, kun alueen ykköslehti lopetetaan ja uutisseuranta kuihtuu? Tutkija arvelee, että kun uutisointi vähenee, kansalaiset vieraantuvat hallinnosta ja politiikasta. Journalisti, 2022, <https://journalisti.fi/artikkelit/2022/10/mita-seuraa-kun-alueen-ykkoslehti-lopetetaan-ja-uutisseuranta-kuihtuu-tutkija-arvelee-etta-kun-uutisointi-vahenee-kansalaiset-vieraantuvat-hallinnosta-ja-politiikasta/>

10 R. Virranta, Onko Suomessa uutiserämaata? Suomen Lehdistö, 2021, <https://suomenlehdisto.fi/onko-suomessa-uutiseramaata/>

11 A. Waronen, O. Ponto and J. Pohjavirta, Where do the journalists in Finland live? Katja Mabrouk and three others explain how they work away from others. Journalisti. 2023, <https://journalisti.fi/artikkelit/2023/03/missa-asuvat-suomen-journalistit-katja-mabrouk-ja-kolme-muuta-kertovat-tyostaan-etaalla-muista/>

The media coverage is complete in Finland but there is no data on how "well served" suburban or rural areas are by print and online newspapers, public service media or commercial radio stations. This is difficult to evaluate/not very relevant in a country like Finland with a small population, where the cities are also generally small. Local newspapers, as well as regional newspapers, together with various free and city newspapers, report on events in the different suburbs of the city where they are published. In some of the largest cities, such as Turku, free and city newspapers may also have editions from different regions. In the capital region, several free newspapers focus on the issues of a certain part of the city.

According to The Finnish Transport and Communications Agency (*Traficom*) roughly half of Finnish households watch television via the terrestrial network, which means using rooftop antennas. The terrestrial TV network reaches over 99.9% of the people in Finland.¹² In 2022, only about 4% of Finns did not have an internet connection. A little over half of Finns use both fixed and mobile broadband at home. 42% use only mobile broadband, i.e. a phone's network connection, a mobile router and/or a mobile phone.¹³

There might be "news deserts" but they are placed in locations where very few people live. Looking specifically at Lapland, an area covering 25% of Finland or 100,367 km², it has around 179,000 inhabitants, slightly less than the number of reindeer. However, a large part of the population – more than 60% – is concentrated in four cities, Rovaniemi, Tornio, Kemi and Kemijärvi. There is only one daily newspaper, *Lapin Kanssa*, which has journalists in three out of 21 municipalities. The PSM *Yle* has two newsrooms in Lapland and, in addition, there are seven local papers that are members of the industry association News Media Finland.

Market and reach - Medium risk (47,5%)

Finns' reading of paid-for newspapers and tabloids (print + digital) has remained stable and regular throughout recent years. According to the National Media Survey,¹⁴ 95% of Finns over the age of 15 read newspapers. In numbers, this means more than 4.1 million people. Digital reading is most common in the 35-44 age group, 94%. Those over 65 use the digital channels of newspapers the least, although even three out of four of them (74%) read digital newspapers either in addition to paper newspapers or only in digital form. 55% of all Finns read a printed newspaper. According to Nielsen,¹⁵ local and regional media play an important role in the media ecosystems. Newspapers have also helped people feel attached to their local communities, providing a relevant source of information and space for debate and supplementing the national news arena sustained by the large newspapers, i.e. national and regional newspapers.¹⁶

Challenges persist in attracting new paying subscribers, particularly among younger demographics.¹⁷ Compared to several Western nations, Finns exhibit slightly lower willingness to pay for digital news.¹⁸ In Finland, newspapers, radio, and television are all heavily concentrated media sectors. Newspaper publishing is presently characterised by frequent mergers and consolidation. Most of the remaining regional newspapers have reached a monopoly-like position in their markets, as they own the majority if not all the

12 Traficom, Broadcasts in terrestrial TV network, 2023a, <https://www.traficom.fi/en/communications/tv-other-audiovisual-services-and-radio/broadcasts-terrestrial-tv-network>

13 Traficom, Monitori service, 2023b, <https://eservices.traficom.fi/monitori/area>

14 Media Audit Finland, KMT 2022 LEHTIEN LUKIJAMÄÄRÄT, 2022, <https://mediaauditfinland.fi/wp-content/uploads/2022/11/KMT-2022-lukijamaarat-liite.pdf>

15 R. K. Nielsen, Local Newspapers as Keystone Media: The Increased Importance of Diminished Newspapers for Local Political Information Environments, 2015, pp. 51-72 in R. K. Nielsen (ed.) Local Journalism. The Decline of Newspapers and the Rise of Digital Media. London/ New York: I.B.Tauris.

16 T. Syvertsen, O. Mjøs, H. Moe and G. Enli, The media welfare state: Nordic media in the digital era, 2014, p. 165, Ann Arbor: University of Michigan Press.

17 M. Ala-Fossi, A. Alén-Savikko, M. Grönlund, P. Haara and H. Hellman, The state of media- and communications policy and how to measure it Final report, 2018, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/160714/04_18_Media- ja-viestintapolitiikan-nykytila.pdf?sequence=1&isAllowed=y

18 N. Newman, R. Fletcher, K. Eddy, C. T. Robertson and R. K. Nielsen, Reuters Institute Digital News Report 2023, 2023, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf

local papers and even free sheets in the surrounding area.¹⁹ According to data provided by Statistics Finland²⁰, the number of newspaper titles (1-7 days a week) have steadily declined during the past decade, going from 320 in 2013 to 274 in 2022.

Public service media Yle reaches a large part of the population, 94%, and even among under 15 year olds the reach is 75%. Local and regional newspapers are among the most trusted media outlets (81% and 79%) but their weekly reach is only 17% and 16% offline, and even less, 12% and 14% online. Finland is also one of the few countries where interest in news has gone up between 2015 and 2023 while a very small proportion of the population is disengaged (2%). This, in combination with the fact that most news consumers prefer to access content directly from news websites and not through aggregators or social media, shows a very strong engagement with news.

Compared to Sweden and Norway, there is very little direct state support for media in Finland, instead the state relies on tax subsidies. Since 2010, the total cumulative amount of indirect aid received through reduced VAT has been around €1.5 billion. In their 2020 report, the VATT Institute estimated the benefit derived from the tax subsidy to be around €125 million.²¹

Safety of local journalists- Low risk (21%)

Minor or serious physical violence is rare in Finland. There are a few instances where journalists have been attacked during demonstrations. On 4 February 2022, at least five Finnish journalists and media workers from Yle (reporter and camera person), Iltalehti (reporters) and MTV3 (reporter) were attacked during the convoy protest, a rally against pandemic restrictions and the increase in energy prices, which took place in Helsinki. In 2023, a journalist working for the newspaper *Karjalainen* was hit by a person interviewed.²² However, monitoring and following while conducting journalistic work or disruptions of work such as heckling and interfering during interviews is more common. According to Hiltunen²³ 13-14% report that they have encountered this once a year or less. Physical pressure against journalists may include violence, physically interfering with the performance of journalistic work and tampering with or destroying working equipment. In a 2016 survey²⁴, 16% of working members of the Union of Journalists reported having received threatening messages in recent years. Instances are few and seem to be random, no trend can be identified. Despite relative gender parity in society, female journalists are most at risk of online harassment and intimidation.²⁵

There is no legal framework in place in line with the initiative SLAPP (Strategic Lawsuit Against Public Participation) and the Finnish parliament is sceptical towards several parts of the proposed legislation, which are foreign to the context of law in Finland.²⁶ However, there are some examples of right-wing politicians using defamation appeals in courts to silence journalists. Two recent court decisions show that, even though the process is slow, defamation appeals do not endanger the freedom of speech in Finland. Finland's journalists' union has created a support fund to cover loss of income, therapy and other expenses that can result from stress of this kind.²⁷

Editorial independence- Low risk (29%)

The indicator editorial independence scores a low-risk level of 29%. Finland follows the Nordic tradition of self-regulation and recorded instances of abuse are few, with no signs of political control exerted through direct or indirect ownership means found in the country.

19 H. Hellman, Lehdistön alueelliset valtiat: Sanomalehdistön kilpailu ja keskittyminen merkityksellisillä markkinoilla. *Media & Viestintä*, 2022, 3:1-29.

20 Statistics Finland, Mass Media Statistics, 2023, https://view.officeapps.live.com/op/view.aspx?src=https://pxhopea2.stat.fi/sahkoiset_julkaisut/joukkoviestintatilasto/data/t202.xlsx&wdOrigin=BROWSELINK

21 M. Ala-Fossi, M. Grönlund, H. Hellman and K. Lehtisaari, Media and Communication Policy Monitoring report 2019, 2020, https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162144/LVM_2020_04.pdf?sequence=1&isAllowed=y

22 Reporters Without Frontiers, Country report: Finland, 2023, <https://rsf.org/en/country/finland>.

23 I. Hiltunen, Experiences of External Interference among Finnish Journalists, 2019, <https://sciendo.com/es/article/10.2478/nor-2018-0016>

24 M. Marttinen, "Hakkaan sinut paskaksi". *Journalisti*, 17 March 2016, <https://journalisti.fi/artikkelit/2016/03/hakkaan-sinut-paskaksi/>.

25 Reporters Without Frontiers, Country report: Finland, 2023, <https://rsf.org/en/country/finland>.

26 M. Fredman, Eduskunnan lakivaliokunta kriittinen EU:n suunnitelmille kiusantekomielessä nostettuja SLAPP-kanteita vastaan, 2022, <https://asianajajaliitto.fi/2022/09/eduskunnan-lakivaliokunta-kriittinen-eun-suunnitelmille-kiusantekomielessa-nostettuja-slapp-kanteita-vastaan/>

27 Reporters Without Frontiers, Country report: Finland, 2023, <https://rsf.org/en/country/finland>.

When considering the distribution of state subsidies, a very low risk is detected. The Government issued a decree on discretionary government grants for supporting communications and news media in 2023. In addition to national media operations, the aim is to ensure adequate regional and local media services and to prevent the emergence of news wastelands. The discretionary government grants would be targeted especially at local operators.

In terms of state advertising, there is no data available. No overviews are published of who advertises in the media or how much money the media receives from different types of actors through advertising revenue. While this might be seen as a transparency issue, no actual evidence that would suggest concern is found.

By analysing the extent of commercial and political influence over editorial content, it can be stated that self-regulatory safeguards are generally in place and effective. The ethical guidelines for journalists summarise the journalists' and publishers' view according to what kind of ethical principles they should operate. In some cases, the journalists' instructions are stricter than the laws governing mass media. The Council for Mass Media in Finland (JSN) interprets the guidelines, but it is not a court and does not exercise public authority.

At the same time, it has to be highlighted that local commercial media in Finland are still dependent on advertisement - as digital subscriber revenues only grow slowly and mainly go to national media companies. Hence, newsrooms need to balance the watchdog ideal to scrutinise local companies with the need to have a sustainable business model. Furthermore, according to a 2020 survey by the Finnish Newspapers Association (currently News Media Finland²⁸), four out of five (79%) newspaper editors had experienced attempts to influence the journalistic content within the last couple of years. Four-fifths (82%) of editors-in-chief said that politicians had tried to influence the content of their publication. In addition, three quarters of editors faced attempts to influence from either readers (75%) or advertisers (72%). Nevertheless, the fact that influential people want to have an impact on editorial decisions, does not mean that editors have no choice but to agree: negotiating attempts to influence editors is considered part of the daily journalism routine.²⁹

All national authorities implied in media regulation also have a remit over the local sphere. No signs of concern are detected in this context. With specific regard to the Finnish PSM, Hiltunen notes that the effects of direct political pressure are very limited, but there might be indirect pressures related to politically controlled funding and internal desires to please political parties.³⁰ Yle's news and current affairs regional operations include ten Finnish-language and one Sámi-speaking regional operation. Through these, YLE is present in nearly 30 locations across the country.

Finally, in terms of content diversity, it can be argued that local media provide diverse scope of stories to an extent and viewpoints and tone are sometimes non-diverse.

Social inclusiveness- Very low (11%)

Yle enjoys a high level of trust (85%) while more than half feel that Yle is important to society, and a third consider Yle a significant part of their personal media use.³¹ Finland remains the country with the highest levels of overall trust in news (69%) according to the Digital News Report 2023 from the Reuters Institute.³²

Finland is a tri-lingual country with Finnish, Swedish and Sámi (regional status) as official languages. In total, Yle offers content in twelve languages, including sign-language, Romani, Karelian, English, Russian, and Ukrainian.

28 Uutismedian liitto, Vaikuttamispyrkimykset ovat arkipäivää uutismedian päätoimittajille, 2020, <https://www.uutismediat.fi/ajankohtaista/vaikuttamispyrkimykset-ovat-arkipaivaa-uutismedian-paatoimittajille/>.

29 P. Kivioja, Joka kuudes sanomalehden päätoimittaja kokenut vaikutusyrityksiä oman talon johdosta, 2020, <https://suomenlehdisto.fi/joka-kuudes-paatoimittaja-kokenut-vaikutusyrityksia-oman-yrityksen-johdosta/>.

30 I. Hiltunen, External Interference in Finnish Professional Journalism, 2022, <https://trepo.tuni.fi/bitstream/handle/10024/141075/978-952-03-2486-5.pdf?sequence=5>.

31 Yle, Annual Report 2023: Yle's customer relationships in 2022, 2023, https://drive.google.com/file/d/1qcIF-XellYAdZgDFXj_WeDyGwjHXflu/view

32 N. Newman, R. Fletcher, K. Eddy, C. T. Robertson and R. K. Nielsen, Reuters Institute Digital News Report 2023, 2023, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf.

The Swedish speaking commercial media sector is vibrant and public service media guarantees services in Sámi. For instance, the media on the Swedish speaking Åland islands, with only 30,000 inhabitants, is exceptional: two daily newspapers, a public service radio and a commercial radio station. YLE has services in Russian and Ukrainian, servicing the largest migrant communities. However, neither public service nor privately owned media serve other minority groups effectively.³³

National minorities recognised by law, the Swedish speaking Finns and the native Sámi, are served relatively well in terms of airtime; public service media covers national minorities, and the amount of available media content is proportionate to the minorities' populations.³⁴ Yle has 32 regional news offices in Finland: 25 Finnish speaking, 8 Swedish speaking and three Sami regional offices, correspondents and assistants around the world. Content in thirteen languages: in Finnish, Swedish and three Sámi languages, in sign language, in plain Finnish and plain Swedish, Romanian, Karelian, English, Russian and Ukrainian.³⁵ During the COVID-19 pandemic Yle started publishing pandemic-related news in other minority-languages on their website and social media but this initiative ended in May 2021. Overall, unofficial minority languages other than Russian and English were served only through the Yle website and social media, not in broadcasts.³⁶

There is no media authority supervising or measuring respect for internal pluralism principles in Finland. Officially news reporting in PSM is steered by the Yle Code of Conduct³⁷, which is based on the Act on Yleisradio Oy (the Finnish Broadcasting Company; 1380/1993). Yle personnel are expected to comply with Yle's values and ethical principles in their daily work and all operations. Yle promotes equality, non-discrimination and fairness and is committed to the principles enshrined in the UN Universal Declaration of Human Rights.

Best practices and open public sphere

When discussing to what extent Finnish news media are experimenting with new ways of attracting readers who are willing to pay, innovation is hard to measure. The data are anecdotal and drawn from industry news. As LM4D focuses on local media it unfortunately has to conclude that there is very little innovation taking place in that field. In a Nordic comparison, Finnish media companies are behind when it comes to certain features such as winning INMA (International News Media Association) awards or getting people to pay for digital news, 21% in Finland compared to neighbours such as Norway at 39%. However, there are a few positive examples, for instance the business daily *Kauppalehti* has been able to reduce subscriber churn with data analytics³⁸ and a more inclusive business model³⁹, while *Keskisuomalainen* reduced churn with newsletters⁴⁰, and the dailies *Helsingin Sanomat* and *Ilta-Sanomat* experimented with big stories to attract more paying subscribers.⁴¹

33 M. Mäntöjoja and V. Manninen, Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2021. Country report: Finland, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2022, <https://cadmus.eui.eu/bitstream/handle/1814/74688/MPM2022-Finland-EN.pdf?sequence=1&isAllowed=y>.

34 Act on the Finnish Broadcasting Company, 1380/1993, Section 7, <https://www.finlex.fi/sv/laki/kaannokset/1993/en19931380.pdf>.

35 In yearly reports, Yle has special section listing services for special and minority groups, <https://yle.fi/aihe/s/10002647>

36 M. Mäntöjoja and V. Manninen, Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2021. Country report: Finland, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2022, <https://cadmus.eui.eu/bitstream/handle/1814/74688/MPM2022-Finland-EN.pdf?sequence=1&isAllowed=y>.

37 Yle, Yle Code of Conduct, 2022, <https://yle.fi/aihe/s/yle-code-conduct>

38 International News Media Association, L. Tuomela, Kauppalehti's FOMO page proactively reduces churn, saves 30% of subscribers entering flow, 2023, <https://inma.org/blogs/digital-subscriptions/post.cfm/kauppalehti-s-fomo-page-proactively-reduces-churn-saves-30-of-subscribers-entering-flow>.

39 International News Media Association, J. Suhonen, Kauppalehti details its journey of building a more inclusive business model, 2023, <https://inma.org/blogs/digital-subscriptions/post.cfm/kauppalehti-details-its-journey-of-building-a-more-inclusive-business-model>.

40 International News Media Association, M. Niskanen, Keskisuomalainen Group reduced subscriber churn with newsletters, 2023, <https://inma.org/blogs/ideas/post.cfm/keskisuomalainen-group-reduced-subscriber-churn-with-newsletters>

41 International News Media Association, Helsingin Sanomat, SML model, 2023, <https://inma.org/best-practice/Best-Innovation-in-Newsroom-Transformation/2023-340/SML-model>



France

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Context

Strictly speaking, there is no debate about news deserts in France. Independent online titles such as *Mediacités* have raised the issue of the closure of local branches of daily regional press (*Presse Quotidienne Régionale*- PQR) titles, and the merger of *France 3* and *France Bleu* newsrooms within the public audio-visual service is causing a stir, but it is not possible to call this a public problem at this stage. Specialised newspapers such as the *Courrier des maires et des élus locaux*¹ (a journal for locally elected representatives) are trying to open the debate about news deserts, but without any mention in the political debate or in the mainstream media.

However, there is a debate on media concentration, which strangely spares local media, even though it is the most concentrated media sector.² In many areas, there is even a monopoly of certain players.

France being a highly administratively centralised country, the notion of local media is not defined, and "local" media are considered to be those whose territory of coverage is smaller than the national territory. Community media have no legal recognition; they are assimilated to associative media.

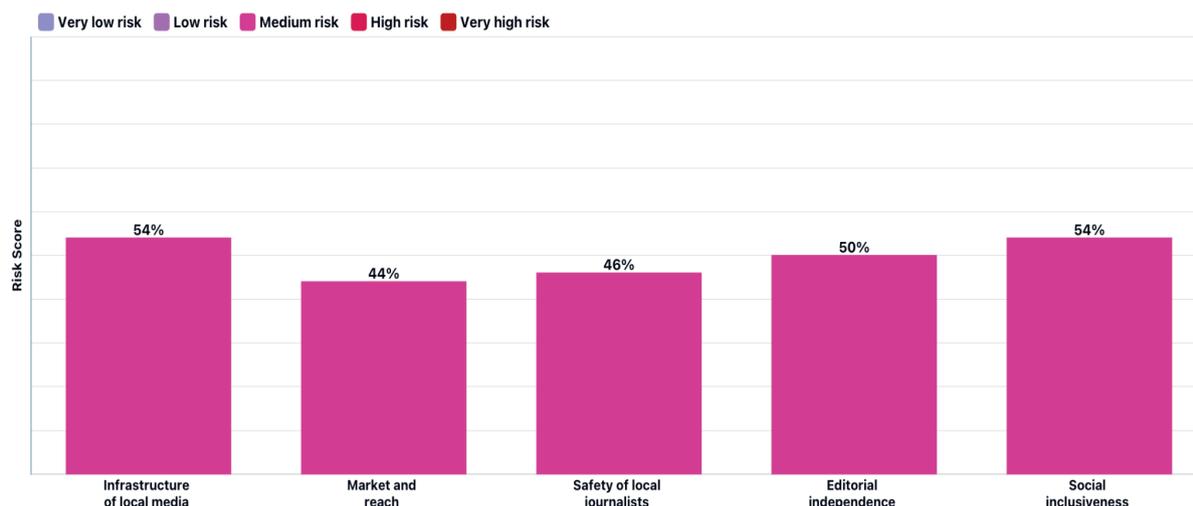
In France, until the 1980s, 3 players offered local information: the regional daily press; the local and regional weekly press; state-owned public television, with its regional stations, and state-owned radio, with the *France Bleu* network. In the early 1980s, these media were joined by community and commercial radio stations and television channels, first on cable and then on terrestrial networks at the end of the 1980s.

Online media added to this landscape since the mid-2000s. However, in terms of audience and turnover, today the landscape is still dominated by the traditional players, i.e. the PQR, the *Presse Hebdomadaire Régionale et Locale* (PHRL) and state-owned public television, the only ones to cover the whole country, even if the granularity of the content they offer does not extend to all territories.

Unsurprisingly, the least economically advantaged areas (peri-urban and rural zones) are also those that suffer most from a problem of local information supply or distribution of existing supply.

1 Gare à l'appauvrissement de l'information locale, Le courrier des maires et des élus locaux, n°361, 12 novembre 2021.

2 À l'heure du numérique, la concentration des médias en question ? - Rapports de commission d'enquête Rapport n° 593 (2021-2022), tome I, déposé le 29 mars 2022.



Granularity of infrastructure of local media- Medium risk (54%)

In France, urban areas are the best served by local media outlets. They benefit not only from several daily pages in the PQR titles but also from local television channels that cover news related to these areas. Similarly, regional public television devotes a significant proportion of its news to these areas. Furthermore, pure players are generally concentrated in urban areas where they exercise investigative journalism and the national news media concentrate their coverage on urban areas.

As far as the print media are concerned, more than one journalist in ten has become redundant since 2009 in the regional daily press newspapers (PQR). In ten years, according to a 2019 survey by *Mediacités*³ staff numbers have fallen by 12.5% in local dailies. A total of 108 local branches of PQR have closed over the last ten years in mainland France, according to the same survey. Most closures concern agencies in rural areas.

The general picture is slightly different for the local and regional weekly press. According to the 2022 figures from the *Observatoire des métiers de la presse*⁴, the number of journalists in PHRL has been stable for ten years, despite the disappearance of at least 9 weeklies and 19 local agencies.

In radio and television, with around 400 and 1,400 journalists respectively working in the regions, the public service media *France Bleu* and *France 3* have achieved stable figures over ten years. There are currently 33 local editorial offices for *France Télévision*, including 9 in the French overseas territories, and 44 *France Bleu* stations and as many editorial offices⁵.

The 44 *France Bleu* stations do not, however, provide perfect coverage of mainland France. Most stations have between eight and twelve journalists working at the station's head office, and sometimes one or two reporters in residence (RER) in another town in the area. In the absence of a RER, some departments are covered only sparingly. This is, for example, the case for Saône-et-Loire, Aisne, Oise, Allier and Cantal. The situation is similar for *France 3*, but in addition the journalists are all based in the regional agencies and have to travel to cover stories outside the metropolises.

3 K. Augeart, 'Au moins 108 agences locales de presse quotidienne régionale ont fermé en dix ans', *Mediacités*, 26 June 2019. <https://www.mediacites.fr/enquete/national/2019/06/26/au-moins-108-agences-locales-de-presse-quotidienne-regionale-ont-ferme-en-dix-ans/>

4 Observatoire des métiers de la presse, 'La comparaison du nombre de journalistes par tranches d'âge et par sous-secteurs de la presse écrite en 2022' <https://data.metiers-presse.org/explore.php#bar/alljournalists/journalistNumber/ageSlice/pressSubSectors/none/2022/none>

5 Ministère de la Culture, 'Contrats d'objectifs et de moyens 2020-2023 entre l'Etat et les entreprises audiovisuelles publiques', 22 August 2023 <https://www.culture.gouv.fr/Thematiques/Audiovisuel/Publications/Contrats-d-objectifs-et-de-moyens-2020-2023-entre-l-Etat-et-les-entreprises-audiovisuelles-publiques>

1,200 journalists work for *Agence France Presse* (AFP). The agency has bureaus in France's major cities, but not in all regions. There are offices in Nice, Marseille, Toulouse, Bordeaux, Rennes, Lyon and Lille. AFP then calls on freelancers to cover events in areas where it is not permanently present⁶.

Once again, however, the French news network is highly centralised in urban areas. It is organised in a “hub-and-spoke” pattern from the centre of Paris, with a similar structure in the main cities.

The map you can find at the [following link](#) refers to the local media coverage in France in 2019, that is, local media outlets established in France, by administrative department. The original data source for this visualisation is *Ouest Médialab / Festival de l'info locale* and you can access it [here](#).

Market and reach- Medium risk (44%)

France's leading local media, PQR saw its revenues fall from 2,544,633 to 2,064,607 euros between 2015 and 2020. Revenues from physical sales have fallen steadily (1,613,182 to 1,431,649 euros), as have advertising revenues (931,452 to 632,959 euros). Digital revenues (sales and advertising) have risen steadily (73,664 to 120,625 euros), but this has not offset the losses recorded for the print press⁷.

There was a collapse in 2020 due to the pandemic and as a result, the figures for 2021 and 2022 are higher than those for 2020, but they continue the downward trend observed since the early 2000s. Community media with advertising resources have suffered the same difficulties. For television and radio, the trend is different, even though 2020 was also synonymous with a significant decline. Advertising revenues for local television and radio have tended to remain stable over a 10-year period. In 2022, local radio returned to the level of advertising revenue achieved in 2019 before the health crisis although radio audiences are tending to decline. Despite this situation, the number of local media outlets in France has remained stable over the last five years.

It must be said that there is considerable and long-standing state support for the media in general (from which local media benefit) and for the press in particular. Support for the press meets one or other of three major objectives: the development of distribution, the defence of pluralism, and the modernisation and diversification towards multimedia of press companies. In total, this aid amounted to 110 million euros by 2022⁸.

In addition, there is specific aid for local social information media (€1.8m euros in 2021 for publications, press websites, radio, television, web TVs, web radios, etc.), a support fund for community radio stations (€ 32m in 2021, shared between 720 radio stations) and support for online press services as part of the support for pluralism (€8m shared by local and national online media).

However, the major regional press groups continue to capture the lion's share of direct aid and distribution aid (the top 12 groups share € 24m in 2021). In recent years, these amounts have remained stable or even increased slightly.

In addition to these figures, the state and local authorities purchase advertising space in the media. In the case of the state, 465 million euros are spent each year on advertising campaigns, but details of this expenditure are not public, and it is not possible to assess the share of local media in this total.⁹ The state puts the entire amount out to tender with an agency that purchases the advertising space itself. For local

6 Rapport annuel AFP 2021, AFP - 2022: https://www.afp.com/communication/report_2022/AFP_RapportAnnuel_2021_FR_web.pdf

7 Ministère de la Culture, 'Données sur la presse écrite': <https://www.culture.gouv.fr/fr/Thematiques/Presse-ecrite/Donnees-sur-la-presse-ecrite>

8 Ministère de la Culture, 'Tableaux des titres de presse aidés', 8 September 2023: <https://www.culture.gouv.fr/Thematiques/Presse-ecrite/Tableaux-des-titres-de-presse-aides2>

9 Rapport sur les dépenses de communication de l'État, Cour des comptes - 2011: <https://www.ccomptes.fr/sites/default/files/EzPublish/Depenses-de-communication-des-ministeres.pdf>

authorities, it is even more opaque. There is no transparency on the amounts involved, but the main local authorities regularly buy space in the most widely distributed newspapers.

Finally, the principal method the French choose to pay for local news is by subscription, and this applies to the regional daily press, the local weekly press and the online press. This is followed by payment per issue, and then participatory financing.

Subscriptions account for 64% of PQR circulation, particularly through home delivery, which accounts for 54% of paper copies. Newsstand sales account for 21% of sales. This is followed by individual digital copies (13%) and digital subscriptions (2%)¹⁰.

The digital subscription model favoured by the new local news players born on the internet has still not stabilised. The main players using it (*Mediacités*, *Marsactu*, *Rue89 Strasbourg*, etc.) are not in a comfortable economic situation and are regularly forced to launch calls for participatory funding.

Safety of local journalists- Medium risk (46%)

A number of aspects of the conditions under which journalists work in France are governed by the collective agreement¹¹, which also applies to freelance journalists, who have benefited from the presumption of salaried status since 1974. The status of journalists is protected by the Brachard law of 1935, which guarantees professional benefits shared by the entire profession, including the conscience clause, the assignment clause and one month's salary per year of seniority in the event of dismissal.

But, today, for local media, the trend matches that of national media, with a declining number of journalists, even though the demand for production has continued to increase as media have decided to invest more and more in digital media (audio-visual production, writing, podcasts, digital social networks, etc). As a result, actual working conditions have tended to deteriorate. The closure of certain local agencies and the decline in the number of journalists have reinforced the practice of desk-based journalism, even though local journalists are still working in the field.

As far as social security benefits and job protection are concerned, the rules are those set out in the collective agreement. However, local journalists are paid less than journalists working in national media. A minimum salary scale is set by decree, regulating remuneration according to the duties performed.

Open-ended contracts are still the rule for most local journalists¹², although precarious contracts, particularly long internships, are on the rise.

With regards to the physical and psychological safety of journalists, a significant number of the 432 incidents reported between 2018 and 2023 by Mapping Media Freedom¹³, more than half, concern local journalists. This is explained in particular by their proximity to the subjects covered and their visibility in the local community. Not all incidents are of the same severity, and they range from insults and tags on vehicles to physical threats or attempted physical harm, or even attempted murder.

The main trade union in the country, the *Syndicat National du Journalisme* (SNJ) frequently denounces situations where the situation imposed on journalists makes it impossible for them to respect professional ethics. The SNJ is present in all companies with more than 50 employees but less so in smaller companies, where the law does not require a trade union presence¹⁴.

Investigative journalism is the most affected by SLAPP procedures, with new online media spearheading the trend. These outlets are regularly taken to court through SLAPP proceedings that force them to incur

10 ACMP, OBSERVATOIRE 2023 DE L'ACPM (SYNTHÈSES 2022) <https://www.acpm.fr/Les-chiffres/Observatoire-2023-de-l-ACPM-Syntheses-2022>

11 SNJ, 'Convention collective de travail des journalistes': <https://www.snj.fr/convention-collective-de-travail-des-journalistes/présentation>

12 La PQR, éditions La Découverte, Franck Bousquet Pauline Amiel - 2021: https://www.editionsladecouverte.fr/la_presse_quotidienne_regionale-9782348057939

13 Mapping Media Freedom, European Centre for Press and Media Freedom - 2023: <https://www.mappingmediafreedom.org/#/>

14 Article L2143-6, Code du travail - 2023: https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006072050/LEGISCTA000006195667/#LEGISCTA000006195667

financial costs and spend energy defending themselves. This is the case in Brittany, for example, with the agri-food industry¹⁵. It is also the case with *Le Poulpe* in Rouen being sued by a pollution control company, and *Mediacités*, which is sued by local authorities and businesses in every town where it produces investigative reports.

Editorial independence- Medium risk (50%)

In France, there is no law regulating the possibility of a local or national political leader, or an elected official in general, controlling one or more media outlets. In terms of ownership control, only one press group, the family-owned *La Dépêche du Midi*, which has a monopoly on daily written news in many parts of the Occitania region, can be said to have a mix of political and media interests.

The criteria for direct and indirect subsidies are transparent; the amounts given have been published since 2013. But the criteria are numerous, as are the exceptions, which are difficult to understand. What emerges is that the groups receiving the most support are invariably the biggest, those that own the most media outlets and have the largest circulation.

It is a different story when it comes to the various subsidies and purchases of advertising space by local authorities, which are much opaquer, and more easily interpreted as instruments of influence, as demonstrated by the controversy over the subsidies granted by the region to certain newspapers on Reunion Island¹⁶, or *Marsactu's* call for transparency in local authority subsidies¹⁷.

The two main instruments for combatting political influence are the journalist's statute¹⁸ and editorial charters¹⁹. But these are not enough to prevent the co-management of local affairs and an economic situation that makes the media dependent on announcements from the local authorities in the hands of politicians, a situation that affects almost all local and regional titles.

Commercial interference is regulated by a law prohibiting editorial advertising.²⁰ However, in reality, commercial contingencies are omnipresent in the local media, their dependence on the advertising market and partnerships increasing as income from readers decreases. From this point of view, only advertisement-free titles, those that exist solely on subscriptions or diversified advertising revenues, are safe. For PQR titles, as for local television, dependence is strong.

Similarly, PQR titles have diversified their activities, and are increasingly organisers of sporting, cultural and business events, most often in partnership with local authorities. Even though the editorial teams are formally independent, they are not able to take a critical look at these events. What can be said initially is that the PQR tends to favour the voice of the most powerful, those who make the agenda and who are at the same time its advertisers and partners. At the same time, there are editorial differences between the various PQR titles.

In France, the media regulatory authority is ARCOM, which has jurisdiction over the audiovisual sector alone. It is an independent public authority, but its members are appointed by the country's main political authorities. However, the questioning of the independence of ARCOM seems to be less prevalent today than it was a few years ago. Locally, its role is limited to frequency allocation. As the dominant local media is the press, it is not within its remit.

The directors of *France Télévision's* local stations are appointed by the President of *France Télévision*

15 S. Foucart, 'Dans l'ouest de la France, les violences et intimidations contre des défenseurs de l'environnement se multiplient', *Le Monde*, 29 March 2023: https://www.lemonde.fr/planete/article/2023/03/29/dans-l-ouest-de-la-france-les-violences-et-intimidations-contre-des-defenseurs-de-l-environnement-se-multiplient_6167468_3244.html

16 E. Lauret, 'Configuration contemporaine du journalisme local de La Réunion. Ruptures et continuités dans les pratiques professionnelles et dans les représentations sociales des journalistes', Thèse de doctorat, 2023.

17 'Demandons la transparence sur les aides aux médias des collectivités locales', Marsactu - 2021: <https://marsactu.fr/agora/demandons-la-transparence-sur-les-aides-aux-medias-des-collectivites-locales/>

18 The Brachard law of 1935.

19 LOI n° 2016-1524 du 14 novembre 2016 visant à renforcer la liberté, l'indépendance et le pluralisme des médias, Journal Officiel - 2016: <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000033385368>

20 Article 10 of the amended law of 1 August 1986 on the legal status of the press.

on the recommendation of the director of the *France 3* regional network, who is himself appointed by the President of *France Télévision*. The same system applies to the local public radio station, *France Bleu*. The presidents of *France Télévision* and *Radio France* are appointed on the recommendation of ARCOM. There is no direct influence, but their appointment is not made without political consideration, as the members of ARCOM are appointed by elected representatives and the appointment decree depends directly on the Presidency. In France, the influence of other political bodies - regional, departmental or local - on PSM's local branches is limited.²¹

Social inclusiveness- Medium risk (54%)

The French doctrine is that of a Republic that is “One and Indivisible”. There is therefore no official recognition of minority groups, or even a list of them.

However, Radio France broadcasts programs in regional languages in all the regions concerned. For its part, France 3 contributes several hundred hours a year to the expression of the main regional languages spoken in France. Radio France Outre-Mer, for its part, is pursuing its policy in favor of regional languages, both in its programming and in its news programs. On the other hand, no programs in immigrant languages are broadcast on the French public service.

Minority languages spoken by immigrant populations are mainly present on associative radio or media produced abroad, which are now easily accessible via the internet or satellite²².

The only offline media available in immigrant languages are private Arabic-language radio stations (e.g. Radio Gazelle in Marseille, Radio Orient in several French cities).

For most of the country, i.e. municipalities with fewer than 50,000 inhabitants, rural areas, suburban areas and suburbs, the situation is one of coverage by PQR correspondents, by private or community radio stations with very small editorial teams, by local weeklies producing mirror information and by information scattered across social networks and local authority websites. In other words, there is virtually no information available for in-depth analysis of local issues, public policies or debates on the future of the region. It is true that the regional daily press is not a unitary one, and some titles such as *Ouest-France* or *Sud-Ouest* try to cover the public problems of the regions, but with limited journalistic resources. For most of the other titles, the local pages are filled with mirror news, information services and the relay of institutional communication. In the larger towns, political issues are better covered²³. First, in the PQR, because the editorial teams are larger and informed journalists are present on a long-term basis. Second, because local public radio and television newsrooms work on these issues, and third, because the new players in local investigation focus on these areas. As a result, public information in France, which enables citizens to be informed and make informed choices about local life, seems to be reserved for the country's major cities.

Best practices and open public sphere

There are two categories of innovative practices for enhancing an open and thriving public sphere: those coming from traditional media, in particular the PQR, and those coming from new entrants to the market. The former aim to offer new products (such as podcasts, specialised newsletters, solution journalism articles, themed supplements or supplements aimed at a well-targeted audience, event organisation, videos on social networking sites or live tweets of certain events) or to reorganise their services to better meet the demand (by creating cross-functional posts for engagement managers, such as at *La Montagne*). Through these innovations, these players are trying to encourage the engagement of their readers, which can often be measured by metrics.²⁴

21 CSA. Présidence de France Télévisions: procédure de nomination, CSA - 2020: <https://www.csa.fr/Cles-de-l-audiovisuel/Connaitre/Liberte-des-medias-audiovisuels-et-regulation/Comment-sont-nommes-les-presidents-de-l-audiovisuel-public>

22 D. Diminescu, 'Les langues de l'immigration dans les médias en France', 2023: <http://www.e-diasporas.fr/#workingpapers>

23 P. Amiel and F. Bousquet, 'Les enjeux de l'information et de la communication. La presse quotidienne régionale : un modèle informationnel sous tension', *Les Enjeux de l'information et de la communication*, 23 (1), pp. 81-92, 2022: <https://www.cairn.info/revue-les-enjeux-de-l-information-et-de-la-communication-2022-1-page-81.htm&wt.src=pdf>

24 N. Pignard-Cheynel and L.a Amigo, '(Re)connecting with audiences. An overview of audience-inclusion initiatives in European French-speaking local news media', *Journalism*, 24(12), pp. 2612-2631, 2023: <https://journals.sagepub.com/doi/full/10.1177/14648849231173299>

The latter, while also resorting to these new products, sometimes offer more radical innovations, as they have built their editorial models on new formats and new ways of reaching news consumers. For example, online newspapers such as *Mediacités* involve their readers in the choice of certain surveys and also offer them the chance to hold shares in the publishing company; they also offer innovative formats that involve readers, such as monitoring the election promises of mayors elected in 2020. Their aim is to establish a real proximity and relationship of trust with their readers.

However, the most enduring formats and the most innovative ways of providing local information come from more or less organised non-professional Facebook groups, which relay, centralise, reformat and comment on information at local or department level²⁵.

Entirely free of charge, these groups act as a social link and provide information that is often essential for organising daily life.

25 O. Tredan and P.Gestin, 'La presse locale sous l'influence des plateformes numériques : l'influence de Facebook sur la circulation de l'information locale', *Études de communication*, 61 (2), pp. 113-131, 2023.



Germany

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Context

Over recent years there has been a growing debate on local media in Germany. However, the term “news deserts” does not play a prominent role in this debate. To highlight the problems of plurality in local news, the term "Einzeitungskreis" is commonly used.¹ This refers to districts with only one editorial outlet producing local news. In its ruling on local radio in North Rhine-Westphalia in 1991, the Federal Constitutional Court stated that the legislator must also ensure media diversity in the "local" sector. However, the State Media Treaty (2020) has largely omitted the topic of local media but identified it as a key issue for the future in an additional protocol.² The State Media Authority of Thuringia³ and the Bündnis 90/Grüne party⁴ have published legal studies, addressing the active preservation of local media diversity. Recently, the Federal Government⁵ and the Federal Ministry for Economic Affairs issued detailed studies dealing with possible types of direct financial support for the press.⁶

Regarding the definition of local and community media, German media legislation lacks a specific legal definition.⁷ Since media legislation is the responsibility of individual federal states, there are thirteen distinct media laws, each establishing different frameworks for local radio.⁸ Notably, not all laws provide specific regulatory frameworks for local media, with a primary focus on regulating local radio.

Media concentration laws in most states set limits for the capital and voting rights of local publishers in local radio stations. These rules were primarily intended to implement the case law of the Federal Constitutional Court and prevent local "double monopolies", i.e., local newspapers and local radio stations in a distribution area coming from the same "hand".

1 H. Röper, "Zeitungsmarkt 2022: Weniger Wettbewerb bei steigender Konzentration," Media Perspektiven, 2022, https://www.ard-media.de/fileadmin/user_upload/media-perspektiven/pdf/2022/2206_Roeper.pdf

2 Protokoll zum Medienstaatsvertrag, 2020, https://www.ard-media.de/fileadmin/user_upload/media-perspektiven/Dokumentation/Protokollerklaerung_zum_Medienstaatsvertrag.pdf

3 J. Ukrow, et al., "Aktive Sicherung von lokaler und regionaler Vielfalt" (VISTAS Verlag, 2020).

4 M. Cornils, "Möglichkeiten öffentlicher Förderung von Lokal- und Regionaljournalismus bei Wahrung der Staatsferne, Gutachten im Auftrag der Bundestagsfraktion BÜNDNIS90/DIE GRÜNEN", Bundestagsfraktion BÜNDNIS90/DIE GRÜNEN, 2021, https://www.gruene-bundestag.de/fileadmin/media/gruenebundestag_de/themen_az/medien/pdf/210512-gutachten-journalismusfoerderung.pdf.

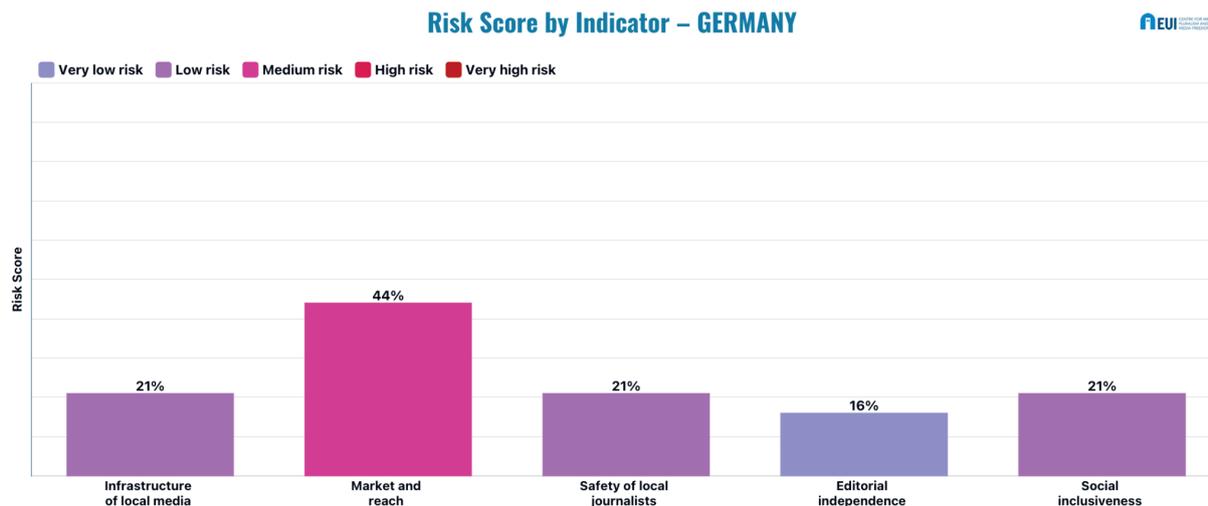
5 DIW ECON, "Die Situation der lokalen Presse in Deutschland und ihre Herausforderungen im Zeitalter der Digitalisierung", 2023, <https://www.bundesregierung.de/resource/blob/974430/2182890/36596999f2fe36061b335f262c3799b6/2023-03-31-gutachten-zur-situation-der-lokalen-presse-data.pdf?download=1>

6 A. Niederprüm et al., "Erforderlichkeit und Möglichkeit Presseförderung", 2022, <https://www.bmwk.de/Redaktion/DE/Publikationen/Technologie/erforderlichkeit-und-moeglichkeit-einer-bundesfoerderung-fuer-die-pressewirtschaft.html>

7 J. Kalbhenn, "Digitalisierung lokaler Medien", Mohr Siebeck, Tübingen. 2024.

8 Only the Bavarian Media Act contains a special regulatory framework for local TV.

The connection between economically deprived areas and news deserts, as well as low internet penetration and news deserts, remains an ongoing concern.



Granularity of infrastructure of local media - Low risk (21%)

Germany still has a robust media landscape, also in terms of the availability of local media. These are primarily local newspapers, which are available almost everywhere, as well as local radios. That said, the landscape of local media services in Germany varies across rural, suburban, and urban areas, highlighting the complexity of media organisation in a federal structure. Notably, the federal states of North Rhine-Westphalia (NRW) and Bavaria have implemented intricate regulatory systems under media law to ensure the provision of "state-wide" local radio. Currently, 44 local radio stations operate in NRW, but the digital challenges are putting pressure on these systems, leading to discontinuation in sparsely populated regions.⁹ State media laws, however, play a pivotal role in dividing federal states into local/regional distribution areas (FM/DAB+), safeguarding local radio coverage.

The press, traditionally present in major centres and even remote corners, has encountered changes.¹⁰ For quite some time, it was considered normal for two competing local newspapers to be available. *FUNKE Verlag*, in a pioneering move in early 2023, decided to supply a rural area in Thuringia solely with EPaper, providing free iPads and training as part of an innovative approach.¹¹ Profitability in rural regions is no longer a given. The variable investigating these issues therefore was assessed as a medium risk.

However, challenges persist, particularly in regions with poor broadband internet provision, hindering the shift to digital formats like ePaper. The public service offerings, accessible via VHF throughout Germany, have strong regional and national coverage but lack a mandate for local coverage. The Eastern parts of Germany, with lower population density, face the highest risk for the press and TV due to these challenges.¹²

The ground-level presence of local journalists is crucial, but the number of journalists employed by local newspapers has seen a decline of 17% from 2010 to 2020.¹³ This variable therefore was assessed as medium risk. This trend is accompanied by changes in work patterns, with publishers centralising editorial functions in larger cities, impacting local newsrooms.¹⁴ Local radio in NRW mandates that editorial offices be located in their respective distribution areas.

9 Medienkommission NRW, "Abschlussbericht des Ad-hoc-Ausschusses Lokalfunk NRW", 2021, https://www.medienanstalt-nrw.de/fileadmin/user_upload/NeueWebsite_0120/Ueber_Uns/Abschlussbericht_MK_final_210510.pdf

10 DIW ECON, "Die Situation der lokalen Presse in Deutschland und ihre Herausforderungen im Zeitalter der Digitalisierung", 2023, <https://www.bundesregierung.de/resource/blob/974430/2182890/36596999f2fe36061b335f262c3799b6/2023-03-31-gutachten-zur-situation-der-lokalen-presse-data.pdf?download=1>

11 D. Hein, "Das ist das Ergebnis von Funkes E-Paper-Modellprojekt in Thüringen," *Horizont*, 2023, <https://www.horizont.net/medien/nachrichten/zeitungszustellung-das-ist-das-ergebnis-von-funkes-e-paper-modellprojekt-in-thueringen-212152?crefresh=1>

12 J.Ukrow et al., "Aktive Sicherung von lokaler und regionaler Vielfalt", *VISTAS Verlag*, 2020.

13 A. Niederprüm et al., "Erforderlichkeit und Möglichkeit Presseförderung," Bundesministerium für Wirtschaft und Klimaschutz, 2022, <https://www.bmwk.de/Redaktion/DE/Publikationen/Technologie/erforderlichkeit-und-moeglichkeit-einer-bundesfoerderung-fuer-die-pressewirtschaft.html>

14 H. Röper, "Zeitungsmarkt 2022: Weniger Wettbewerb bei steigender Konzentration," *Media Perspektiven*, 2022, https://www.ard-media.de/fileadmin/user_upload/media-perspektiven/pdf/2022/2206_Roeper.pdf

The risk for press journalists is particularly pronounced due to these tendencies. Additionally, the presence of local branches and correspondents of public service media (PSM) and the main national news agency, *Deutsche Presse Agentur* (DPA), play a vital role in maintaining local news coverage. DPA has 12 regional offices and 58 locations, indicating a comprehensive effort to cover various regions.¹⁵

While the federal German Constitutional Court has ruled that local PSM coverage could be constitutional under certain conditions, current legislation prevents PSM from entering local news markets. This is intended to protect the existing diverse local pressing landscape from economic competition. Under constitutional law, it would be perfectly possible for PSM to also report locally in order to ensure the basic supply there. It would even be conceivable to establish a new PSM institution for local reporting.¹⁶ Despite having local correspondents or branches across the country, PSMs adhere to a consistent level of geographical granularity, maintaining a broad regional focus.

The map you can find at the [following link](#) refers to number of local and regional newspapers across the different federal states of Germany in 2023. The original data source for this visualisation is *Drehscheibe- Die Deutschlandkarte und Lokaljournalismus* and you can access it [here](#).

Market and reach - Medium risk (44%)

Local newspapers have experienced a steady decline in revenues from sold copies and advertisements, further accelerated by falling advertising revenues.¹⁷ Therefore this variable shows a very high risk. Digital advertising has not been able to compensate for this decline.¹⁸ Similar trends are observed in local radio, where decreasing revenues are expected to result in job cuts.¹⁹ The local media landscape has seen no outlet closures, but has witnessed mergers and “efficiency improvements” through team consolidations.²⁰ Few new local online outlets have emerged, indicating limited overall growth in the number of local media outlets.

Most state media laws aim at local media plurality. To ensure supply distribution levels, the legal regulations focus on ensuring coverage of local radio broadcasting via FM. However, adjustments in newspaper delivery methods, such as rising prices due to the introduction of the minimum wage, have led to changes.²¹ Alternative delivery methods, like central pick-up points and postal delivery, have been introduced in rural areas, triggering subscription cancellations.²²

Germany has traditionally been very sceptical of direct financial support (subsidies) for the media.²³ This instrument was only used briefly during the COVID-19 pandemic. While indirect support for the press includes reduced value-added tax, postal tariff reductions, and exemption rules, community media, TV, and radio do not receive direct state funding. Calls for financial aid for local press have been widespread, with scholars and associations advocating for support. However, decisions on the exact form of support are pending.²⁴

15 Dpa, "Zahlen, Historie & Auszeichnungen", n.d., <https://www.dpa.com/de/ueber-die-dpa/historie-fakten>

16 J. Kalbhenn, "Digitalisierung lokaler Medien", Mohr Siebeck, Tübingen. 2024.

17 A. Niederprüm et al., "Erforderlichkeit und Möglichkeit Presseförderung", *Bundesministerium für Wirtschaft und Klimaschutz*, 2022, <https://www.bmwk.de/Redaktion/DE/Publikationen/Technologie/erforderlichkeit-und-moeglichkeit-einer-bundesfoerderung-fuer-die-pressewirtschaft.html>

18 *ibid.*

19 Medienkommission NRW, Abschlussbericht des Ad-hoc-Ausschusses Lokalfunk NRW, 2021, https://www.medienanstalt-nrw.de/fileadmin/user_upload/NeueWebsite_0120/Ueber_Uns/Abschlussbericht_MK_final_210510.pdf

20 H. Röper, "Zeitungsmarkt 2022: Weniger Wettbewerb bei steigender Konzentration," *Media Perspektiven*, 2022, https://www.ard-media.de/fileadmin/user_upload/media-perspektiven/pdf/2022/2206_Roeper.pdf

21 DIW ECON, "Die Situation der lokalen Presse in Deutschland und ihre Herausforderungen im Zeitalter der Digitalisierung", 2023, <https://www.bundesregierung.de/resource/blob/974430/2182890/36596999f2fe36061b335f262c3799b6/2023-03-31-gutachten-zur-situation-der-lokalen-presse-data.pdf?download=1>

22 *ibid.*

23 Wissenschaftlicher Dienst des Deutschen Bundestags, "Modelle zur Förderung lokaler Medienvielfalt in EU-Mitgliedstaaten", 2019, <https://www.bundestag.de/resource/blob/651774/78e41173fcbca7309f9ca78b060d8c19/WD-10-038-19-pdf-data.pdf>

24 See introduction of this report for recent studies in this regard.

Commercial advertising revenue has clearly decreased across all media sectors (press, TV, and radio) in recent years. The variable, therefore, shows a high risk.

Regarding Market Shares, the Commission on Concentration in the Media in its current report concludes: "The newspaper market in Germany can basically be described as diverse with regard to the market positions of titles and publishers."²⁵ The newspaper market in Germany is diverse at the national level as well as at the local level. In broadcasting, statutory maximum limits exist for cross-media mergers, particularly between broadcasting and local publishers.²⁶

The audience reach for local newspapers has decreased from 27% to 19% in the last three years. Local/regional radio and TV have lost 4% and 5%, respectively, during the same period.²⁷ However, local FM radio continues to maintain a consistently robust listenership.²⁸ The variable therefore shows a high risk.

The willingness to pay for local news varies across media types. Traditional printed weekly newspapers face declining purchases, and users are generally sceptical about paying for digital news.²⁹ Local TV and radio news are ad-financed and do not have a pay offer. However, some native, online, local news offers in the form of newsletter subscriptions show signs of success with private investments.

In conclusion, the economic landscape for local media in Germany is challenging, marked by declining revenues, changes in distribution methods, limited subsidies, reduced advertising revenue, and shifts in audience reach and willingness to pay for news. Despite these challenges, some innovative models, such as native online news subscriptions, provide potential avenues for sustainability and growth.

Safety of local journalists - Low risk (21%)

While there are no reported SLAPP cases on a local level, the recent ruling coalition has expressed a consensus on transposing the SLAPP directive into German law, highlighting a commitment to address these issues.³⁰

Examining the working conditions of employed and freelance journalists for local media outlets, salaries and access to social benefits vary. The statutory minimum wage, at 12 euros per hour since October 2022, aims to ensure fair compensation for all workers, including those in journalism.

In terms of *physical safety*, the European Centre for Press and Media Freedom (ECPMF) reports that after setting two negative records in a row, the number of attacks on media professionals in Germany fell in 2022, recording 56 assaults throughout the year; 27 fewer than in 2021. Local journalists are particularly vulnerable as they lack the anonymity enjoyed by colleagues in larger cities. The study also highlights online and offline intimidation, including demonstrations outside editorial offices. In 2022, demonstrations, particularly those related to COVID-19, emerged as the most dangerous context for journalists, constituting 80% of all reported attacks. The variable therefore shows a high risk.

While the number of attacks decreased in 2022, there is a continued need for vigilance. The effectiveness of journalists' unions, associations, and organisations at the local level plays a crucial role in protecting the journalistic profession. These unions maintain specialised departments for media with regional repre-

25 Kommission zur Ermittlung der Konzentration im Medienbereich, Siebter Konzentrationsbericht, 2023, https://www.kek-online.de/fileadmin/user_upload/KEK/Publikationen/Medienkonzentrationsberichte/Siebter_Konzentrationsbericht/Konzentrationsbericht_2022_Web.pdf

26 *Ibid.*

27 Reuters, Reuters Digital News Report, 2021, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-06/Digital_News_Report_2021_FINAL.pdf; Reuters, Reuters Digital News Report, 2022, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2022-06/Digital_News_Report_2022.pdf; Reuters, Reuters Digital News Report, 2023, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf

28 RadioNRW, "MARKTFORSCHUNG GEKAUFT WIE GEHÖRT: DIE IFAK-STUDIE 2023", n.d., <https://radionrw.de/media-marketing/marktforschung/>

29 C. Buschow, "Zahlungsbereitschaft für digitaljournalistische Inhalte", 2021, https://www.medienanstalt-nrw.de/fileadmin/user_upload/lfm-nrw/Foerderung/Forschung/Zahlungsbereitschaft/LFMNRW_Whitepaper_Zahlungsbereitschaft.pdf

30 J. Kalbhenn et al., "Der Kommissionsentwurf zu einer Richtlinie zum Schutz vor strategischen Klagen gegen öffentliche Beteiligung ('SLAPP')." *Zeitschrift für Urheber- und Medienrecht*, 2022.

31 European Centre for Press and Media Freedom, 'Enemy Image Journalist:in 7: Occupational Risk Proximity', 2023: <https://www.ecpmf.eu/feindbild-journalistin-7/>

sentatives in all federal states advocating for minimum wage regulations, collective bargaining, and other labour rights, and try to ensure the well-being of journalists in both permanent and temporary positions.

Despite legal protections, challenges persist, and the role of unions in advocating for journalists remains essential. The situation in Germany regarding legal frameworks against SLAPPs is evolving, with a consensus on addressing the issue at the legislative level. This ongoing commitment reflects a broader effort to safeguard the rights and safety of local journalists.

Editorial independence - Very low risk (16%)

In the broadcasting sector, the State Media Treaty imposes strict prohibitions on parties and voter associations obtaining licences. This regulation is effectively implemented by state media authorities, ensuring a barrier against direct or indirect political control. There have been no reported cases of attempts by political actors to manipulate broadcasters through ownership or intermediaries.

In the press sector, the legal situation regarding ownership differs. Political parties are allowed to financially engage in the press. Most prominently, the Social Democrats (SPD) hold a media holding company (DDVG) with stakes in various local newspapers. However, DDVG predominantly maintains minority interests, emphasising its commitment to internal press freedom and contributing to the financial independence of the SPD without exerting a controlling influence. Such an influence has not yet been reported; the press also enjoys constitutional protection against such tendencies.³²

Concerning state subsidies and advertising, private press products in Germany receive indirect subsidies through privileged VAT rates and subsidies for newspaper delivery. While this support is constitutionally acceptable, funding must avoid influencing content and journalistic competition. Direct aid during the COVID-19 pandemic was distributed transparently and fairly. No content criteria were used.

To safeguard editorial independence, the Press Code and Media State Treaty establish guidelines for recognised journalistic principles, independence, factual reporting, and the separation of advertising from editorial content.³³ There is no evidence or case law of commercial or political influence over editorial content in practice, although some publishing houses might tend towards the interests of advertising customers.³⁴ Media companies, classified as tendency enterprises, are allowed certain political convictions but maintain editorial independence.

Media regulators, represented by 14 state media authorities in Germany, operate independently under state media laws. These laws grant authority over licenses, concentration laws, journalistic due diligence, protection of minors, and programming regulations, ensuring the general public's interest. The German Federal Supreme Court affirmed the independence and effectiveness of state media authorities.³⁵ The variable therefore shows a very low risk.

Public service broadcasting is considered independent of politics. This is ensured by laws on the composition of supervisory bodies, where only a maximum of one-third may be made up of people with close ties to the state. There are also incompatibility rules that exclude high-ranking politicians from these offices.

Concerning the diversity of news content, researcher Horst Röper notes a growing concentration in the German press, leading to more similar offerings within publishing groups.³⁶ The centralisation of reporting from large publishing groups contributes to a reduction in the diversity of local reporting, impacting the uniqueness of circulation areas. However, local TV and radio are legally obligated to provide diverse content, mitigating concerns related to news content homogenisation. There is no recent empirical study on diversity of news content in local media.

32 Bundesverfassungsgericht, Judgment of the First Senate of 6th November 1979, <https://www.servat.unibe.ch/dfr/bv052283.html>.

33 B. Holznapel et al., "Festschrift für Jürgen Taeger. Journalistische Sorgfaltspflichten auf YouTube und Instagram," *R&W online Datenbank*, 2020, https://www.rw-online.de/artikel/rw_Journalistische-Sorgfaltspflichten-auf-YouTube-und-Instagram.html

34 Ralf Heimann, Local journalist, 12/6/2023, interview conducted by e-mail.

35 Bundesverfassungsgericht, Judgment of the First Senate of 18th July 2018, https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/EN/2018/07/rs20180718_1bvr167516en.html.

36 H. Röper, "Zeitungsmarkt 2022: Weniger Wettbewerb bei steigender Konzentration," *Media Perspektiven*, 2022, https://www.ard-media.de/fileadmin/user_upload/media-perspektiven/pdf/2022/2206_Roeper.pdf

Social inclusiveness - Low risk (21%)

The evaluation of the extent and quality of news offered for and about minorities and the role of local and community media in meeting critical information needs (CINs) lacks recent empirical studies. However, in German media law, this responsibility is deeply ingrained in media legislation, guided by Article 5 of the Basic Law and upheld by the Supreme Court's case law. The core mission of all media outlets, whether national, regional, or local, and across various branches such as TV, radio, press, and online, is to report on Critical Information Needs (CINs).³⁷ Constitutionally, this is the central justification for privileges granted to the media and must be fulfilled and monitored.

For PSM, this commitment to CINs is explicitly outlined in their missions and overseen by supervisory boards. Private broadcasters, governed by the State Media Treaty and state media laws, are obligated to contribute to the presentation of diversity in the German-speaking and European area, with specific attention to information, culture, and education. Compliance with these regulations is monitored by the media authorities. Press outlets adhere to the high standards set by the press code, supervised by the press council.

Although there are radio stations in minority languages (Turkish, but also Frisian and Sorbian) in the larger cities, there are only a few private media outlets that offer news services in minority languages, which is why this variable indicates a high risk.

Local media play a crucial role in engaging with their audience. Traditionally, local journalism has maintained a strong connection to communities, interacting (via call-ins and letters from readers) closely to meet their information needs.³⁸ This practice extends to the online sphere, where social media platforms enable behind-the-scenes glimpses, community actions, programme information, personality building, connections between different content, competitions, and polls.³⁹

Best practices and open public sphere

Academic literature highlights a lack of substantial innovation from established publishing houses.⁴⁰ PSM exhibits higher degrees of novelty but faces limitations due to legal constraints. For-profit and nonprofit journalistic startups show potential but encounter barriers during the start-up phase, including team composition and funding challenges.

Notable examples of digital local media outlets, such as *RUMS*, *Karla*, *Viernull*, *Katapult Greifswald*, and *Correctiv.Lokal*, showcase innovative approaches. These projects, although small and in their early stages, face audience growth challenges. RUMS, for instance, relies on private funding and has gained recognition for its investigative stories in national news.⁴¹

The German media landscape reflects a mix of traditional and innovative practices. Established outlets face challenges in fostering substantial innovation, while emerging digital local media projects demonstrate potential, albeit with hurdles in audience growth and profitability.

37 Medienstaatsvertrag, *Bayern.Recht*, <https://www.gesetze-bayern.de/Content/Document/MStV>

38 W. Möhring, "Lokaljournalismus im Fokus der Wissenschaft", 2015, https://www.medienanstalt-nrw.de/fileadmin/user_upload/lfm-nrw/Foerderung/Forschung/Dateien_Forschung/L171_Lokaljournalismus-im-Fokus-der-Wissenschaft_LfM-Doku51.pdf

39 T. Kabitz, "Digitale Community im lokalen Kommunikationsraum. Journalismus auf Zwei Säulen", In Kurp/Lenzian/Milbret: *Journalismus auf Zwei Säulen*, 2020. Springer. Wiesbaden. pp. 237-245.

40 C. Buschow, "Die Innovationslandschaft des Journalismus," *Landesanstalt für Medien NRW*, Düsseldorf, 2020, <https://www.medienanstalt-nrw.de/>; C. Buschow & C.-M. Wellbrock, "Die Innovationslandschaft des Journalismus in Deutschland." Düsseldorf: Landesanstalt für Medien NRW, 2020, <http://nbn-resolving.org/urn:nbn:de:0168-ssoar-69718-6>

41 C. Opphoven, "Newsletter mit Lokaljournalismus," *Deutschlandfunk*, 2021, <https://www.deutschlandfunk.de/newsletter-mit-lokaljournalismus-konkurrenz-fuer-die-100.html>



Greece

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Context

In Greece, the debate regarding news deserts is non-existent; policymakers, industry professionals and the general public do not engage in discussions on the matter. There is, however, a wider concern about the viability of local media. There is no general definition of local media in Greek law, and they are usually classified into local and regional media, depending on the medium.

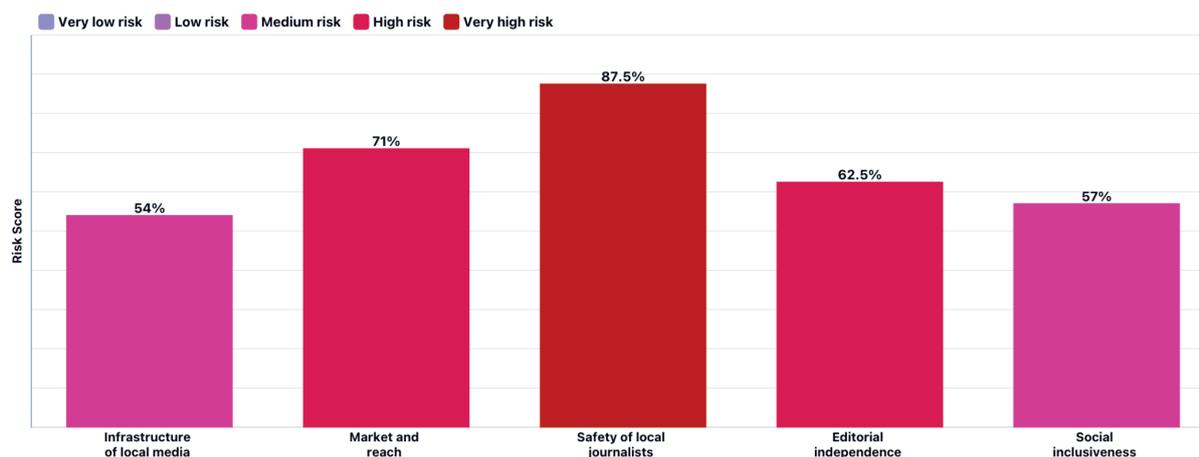
Newspapers first emerged at the end of the 18th century and some of the local news outlets that first circulated during this period continue to play a role in Greece's media ecosystem. Local radio stations were permitted in 1987 and regional television stations in 1989¹. It is also worth noting that many local media journalists tend to work as freelancers and are generally considered underpaid. Moreover, they frequently find themselves at the receiving end of various threats.

Community media are not officially recognised in Greek law. One approach to understanding them is to view them as alternative media that are independent from political and economic elites, with the primary objective of serving citizens².

News deserts do not overlap with the most economically deprived regions. An exception is the NUTS2 region of the North Aegean, which has the lowest GDP per capita (13,500). The islands of Samos and Chios within this region have been identified as news deserts due to the absence of daily newspapers. Ipeiros, which is the third most economically deprived area in Greece also includes a news desert, Thesprotia, which has only one news radio station. Looking at the risk level assessment bar chart, the highest risk is related to the indicator on the safety of local journalists.

1 K. Mayer, "History of Greek press" (Athens: Dimopoulos, 1957); N. Demertzis, and A. Skamnakis, ed., "Local/regional Media and journalism in the New World Communication Order" (Athens: Papazisis, 2000); S. Papathanassopoulos, A. Karadimitriou, C. Kostopoulos, and I. Archontaki, "Greece: Media concentration and independent journalism between austerity and digital disruption," in J. Trappel and T. Tomaz (eds.), *The Media for Democracy Monitor 2021: How leading news media survive digital transformation* (Vol. 2, Nordicom, University of Gothenburg, 2021), pp. 177–230.

2 E. Siapera, and L. Papadopoulou, "Radical documentaries, neoliberal crisis and post-democracy", *TripleC: Communication, Capitalism & Critique. Open Access Journal for a Global Sustainable Information Society*, 16/1, 2018, pp.1-17, <https://doi.org/10.31269/triplec.v16i1.851>; L. Papadopoulou, "Alternative hybrid media in Greece: An analysis through the prism of political economy", *Journal of Greek Media & Culture*, 6/2, 2020, pp.199-218, https://doi.org/10.1386/jgmc_00013_1



Granularity of infrastructure of local media - Medium risk (54%)

Greece's media terrain unfolds with unique challenges and opportunities across rural, suburban, and urban spheres, weaving a tapestry of distinct characteristics and risks.

The rural expanses of Greece grapple with distribution challenges for local media outlets; diminishing selling points and the constraint of low internet penetration. The primary mediums in these areas include radio, television, online platforms, and print media, showcasing both local and national editions. Remarkably, there is a uniformity across regions in the effectiveness of local media services. Even though media operate at a regional level, the challenges faced by rural areas are mirrored in their suburban and urban counterparts. Prefectures like Boeotia, Zakynthos, and Laconia lack local TV stations, emphasising the nuanced risk assessment conducted through interviews with journalistic unions³.

Contrasting the rural scenario, suburban areas paint a low-risk picture. Local media outlets thrive, employing radio, television, online platforms, and frequently print media, catering to a population well-served by the media spectrum. Despite media offices clustering in urban centres, a noteworthy number of journalists choose to live in suburban or rural areas. This spatial choice fosters a more intimate connection with local news, ensuring that suburban areas find substantial inclusion in news coverage⁴.

The urban landscape unfolds with local media leveraging radio, television, online platforms, and print media. However, significant disparities emerge between Athens and Thessaloniki, elevating the risk level to medium. As Athens enjoys a surplus of media offerings, Thessaloniki faces a scarcity, exemplified by the shutdown of news radio stations, which are transitioning their programmes into musical formats⁵. This asymmetry underscores the varied dynamics within urban regions, revealed through interviews with representatives from the Union of Editors of Macedonia Thrace⁶.

The journalistic domain presents a high-risk scenario as most journalists find their base in centralised offices. Some reside in rural or small urban pockets but report intermittently on local affairs for national news outlets. The decline in the number of rural journalists can be traced back to the economic crisis of 2008, compounded by low wages and challenging working conditions, leading to a significant exit from the profession. Online media, while present, operate with smaller teams, and instances of dedicated local media in rural areas are scarce. This high-risk scenario prompts concern, with information dissemination primarily centralised in major cities.

3 Vasilis Peklaris, President of the Union of Editors of Macedonia Thrace, 2/6/2023, phone interview. Themis Beredimas, President of the Union of Magazine and Electronic Press Editor, 3/6/2023, phone interview; Georgios Tsiglifysis, President of the Union of Editors of Thessaly, 2/6/2023, phone interview; Kyriakos Kortesis, President of the Union of Editors of the Daily Newspapers, 3/6/2023, phone interview.

4 Vasilis Peklaris, President of the Union of Editors of Macedonia Thrace, 2/6/2023, phone interview. Themis Beredimas, President of the Union of Magazine and Electronic Press Editor, 3/6/2023, phone interview; Georgios Tsiglifysis, President of the Union of Editors of Thessaly, 2/6/2023, phone interview; Kyriakos Kortesis, President of the Union of Editors of the Daily Newspapers, 3/6/2023, phone interview.

5 Esiemth, "The closure of Real FM 107.1 discredits journalistic work", Journalists Union of Macedonia and Thrace, 2022, <https://esiemth.gr/to-klisimo-tou-real-fm-1071-apaxioni-to-dimosiografiko-ergo>

6 Vasilis Peklaris, 2/6/2023, phone interview.

Public service media (PSM), Hellenic Radio Television (ERT), scored a high risk in terms of its local and regional news offer. Not bound by law to maintain local correspondents, ERT's intentional reduction of its network, following a strategic plan, raises questions about comprehensive local coverage. The restructuring of the 19 regional radio stations⁷ aligns with streamlining regional offices, potentially compromising the mission to cover the entire geographic territory. The main news agency (Athens-Macedonian News Agency) encounters a medium-risk scenario as local/regional correspondents are declining. More flexible work forms are being adopted, although precise figures remain elusive.

The map you can find at the [following link](#) refers to the number of local and regional media in Greece in 2023. The original data source for this visualisation was provided by the non-profit journalism organisation iMEDD (incubator for Media Education and Development) and you can access it [here](#). Additional note: Athens/Attica region is excluded from the iMEDD mapping as the project was focused on local media outside of Athens/Attica region.

Market and reach - High risk (71%)

Although there are no data or statistics available on local media revenues, insights from interviews with experts and relevant stakeholders point to the conclusion that the last five years have been economically devastating for local media⁸. This is also evident in the number of closures of local news outlets. The risk is very high since, based on data from the National Council for Radio and Television ESR⁹ and interviews, 10 local TV stations closed down over the last five years, 13 radio stations ceased operations in 2021, while newspapers also shrank in number. A worrying trend concerned the abundance of radio stations that changed content (and licence) so as to feature only music and no news at all. There are no official data about local online media but all sources agreed they have increased in number over the last five years.¹⁰

Local newspapers have their own distribution companies and there is no decrease in the number of workers. However, a large number of newspaper kiosks have closed down over the last decade due to the economic crisis, and many local newspapers are now sold at a few supermarkets and bookstores. Regional television media distribute their signal through the company DIGEA, owned by nationwide channels, under conditions of complete dependence on both economic factors and signal quality.

Regarding subsidies, the Greek state provides indirect subsidies for daily and weekly local and regional newspapers through reduced postal service rates. Print media (newspapers and magazines) enjoy a lower value-added tax (VAT) rate than standard goods.

For many years there have been no direct state subsidies given to the media. Direct subsidy schemes for local/regional media were first introduced with Law 4674/2020.

Regarding state advertising, there is no specific legislation for local media outlets. All owners of local media agreed that the government provides an insufficient amount of financial support, and local media outlets operate within an unfavourable business environment.

The risk is also very high for commercial advertising in local media since national news outlets tend to absorb most of the available commercial advertising. When it comes to community media, if understood as an alternative, it is safe to say that the danger is very high as these kinds of outlets receive no financial aid from the state. The concentration of local media ownership is generally insignificant, except for a few cases that can be detected. Regarding people's willingness to pay for local news there are no available data.

7 ERT, "Strategic and Operational Plan 2020 – 2024", 2020, https://company.ert.gr/wp-content/uploads/2020/05/EPT_ΣΤΡΑΤΗΓΙΚΟ_ΕΠΙΧΕΙΡΗΣΙΑΚΟ_ΣΧΕΔΙΟ_2020-2024-.pdf

8 Antonis Grigoropoulos, President, Panhellenic Union of radio station owners, 3/6/2023, phone interview; Antonis Dimitriou, President, Union of Regional Informative TV stations of Greece, 7/6/2023, phone interview; George Mixalopoulos, President, Association of Daily Regional Newspapers (SIPE), 10/6/2023, phone interview.

9 ESR, "Annual Report for the Year 2021", <https://www.esr.gr/wp-content/uploads/EP2021.pdf>

10 Antonis Grigoropoulos, 3/6/2023, phone interview; Antonis Dimitriou, 7/6/2023, phone interview; George Mixalopoulos, 10/6/2023, phone interview.

However, it should be noted that local radio and TV stations are free of charge.

Concerning the weekly audience reach of local media, Reuters Digital News Report (2023)¹¹ documented a slight fall compared to last year. However, representatives from unions of local media argued that the reach of local radio shows a general increase, local newspapers maintain a stable reach, while local TV stations have increased their reach¹². It should also be pointed out that local media seem to be the most trusted among Greek citizens, according to the Reuters Digital News Report (2023).

Safety of local journalists - Very high risk (87,5%)

In Greece, local journalists face significant threats, notably poor working conditions due to the absence of labour and social security legislation. Journalists in local media often face lower salaries, flexible employment terms, and unfilled working hour conditions. A substantial number operate as freelancers, thus experiencing financial vulnerability due to lower net pay after taxes and a lack of social security protection. Those officially classified as part-time workers but working full-time hours face additional challenges, creating an environment where labour rights are inadequately protected.

Freelancers and self-employed journalists in local media receive remuneration considerably below the national average, exposing them to financial precarity. Misclassification as freelancers, despite full-time commitments, further undermines their financial stability and deprives them of social security protection, as emphasised by union representatives in interviews¹³, underscoring the urgent need for improved working conditions and legal safeguards.

Physical safety is another pressing concern, with a notable surge in threats and attacks against local journalists, especially online. Despite existing legal frameworks, their ineffectiveness in curbing this trend is apparent. Threats from local actors, including public figures and far-right organisations, persist. The absence of a robust legal framework to guarantee the prosecution of perpetrators exacerbates the risks faced by local journalists, who increasingly find themselves targeted online.

While journalists' unions at the local level play a crucial role in supporting local journalists and maintaining legal departments, their effectiveness is questionable. Not all journalists are union members, and incidents may go unreported due to various concerns. The unions advocate for state intervention to ensure better working conditions, proposing increased government oversight and transparency measures such as tying state advertising to jobs in local media.

Local journalists often adhere more strictly to codes of ethics due to their close-knit communities. However, interventions at the management level in local media outlets pose challenges to maintaining these standards.

An alarming aspect is the common occurrence of SLAPP cases against local journalists, with no anti-SLAPP legal framework. The increase in such cases, as evidenced by incidents involving journalists like Stavroula Poulemini,¹⁴ underscores the urgent need for government intervention to establish legal safeguards against these attacks. Cases like the one in Chios, where a journalist faces a hefty financial demand from a hospital administrator, highlight the vulnerability of local journalists to legal harassment¹⁵.

11 Reuters Institute for the Study of Journalism, "Digital News Report. Greece", 2023, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2023/greece>

12 Antonis Grigoropoulos, 3/6/2023, phone interview; Antonis Dimitriou, 7/6/2023, phone interview; George Mixelopoulos, 10/6/2023, phone interview.

13 Vasilis Peklaris, 2/6/2023, phone interview; Themis Beredimas, 3/6/2023, phone interview; Georgios Tsiglifysis, 2/6/2023, phone interview; Kyriakos Kortesis, 3/6/2023, phone interview.

14 Efimerida ton Syntakton, "Support of Unions to the journalist Stavroula Poulemini for the SLAPP lawsuit", 2023, https://www.efsyn.gr/tehnese/media/385692_stirixi-enoseon-sti-dimosiografo-stayroyla-poylimeni-gia-tin-agogi-slapp

15 Efimerida ton Syntakton, "SLAPP lawsuit against journalist in Chios", 2022, https://www.efsyn.gr/tehnese/media/365569_slapp-agogi-enantion-dimosiografoy-sti-hio

Editorial Independence - High risk (62.5%)

The Greek constitution prevents individual MPs and MEPs from directly owning certain types of media. Domestic legislation does not contain limitations to direct media ownership by political parties. There are also no provisions limiting indirect control (e.g., through the use of intermediaries) by political parties or MPs. According to ownership data maintained by the National Council for Radio and Television (ESR), there are currently no TV channels directly owned by members of parliament or political parties represented in parliament¹⁶. However, information as to whether any members of regional/local governments own media is not publicly available, while it has not been possible to assess indirect ownership of audio-visual media by members of parliament and political parties through the use of intermediaries (e.g., family members).

State advertising is not distributed in a fair and transparent way. At least 30% of the annual advertising plans of public bodies for each type of media should be allocated to regional media (Art. 4(2) of Presidential Decree 261/1997 as in force). In practice however, according to the sources interviewed, national media tend to receive the majority of state advertising, leaving only a small portion for local media¹⁷.

The Greek state provides indirect subsidies for daily and weekly local and regional newspapers through reduced postal service rates (Art 68(4) of Law 2065/1992 in conjunction with Art 2 of Law 3548/2007 and Ministerial Decision 16682/2011). 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). Direct subsidy schemes for local/regional media were firstly introduced with Law 4674/2020 that introduced a provision for supplying cash grants to newspapers.

Regarding local media and editorial independence from commercial influence, it should first be pointed out that there is no specific legislation on this matter apart from the journalists' self-regulatory code. According to participants in this study, laws and self-regulation are ineffective, particularly in smaller societies, where commercial influence on editorial content is more prevalent.

Similarly to commercial influence on editorial content, local journalists believe that laws and self-regulation are ineffective in countering political influence. Research into the Greek media system has forcefully demonstrated the existence of political interference in news media, attributable to the close ties that have developed between established private media owners and political elites.¹⁸

Moreover, the absence of effective self-regulatory safeguards results in journalists being pressured by political and commercial influences.

The National Council for Radio and Television (ESR) is the country's independent administrative authority that supervises and regulates the radio/television market. It has a remit over all national media, including local media. According to various sources, ESR lacks the necessary resources that would allow it to supervise the media market in a timely and effective manner. Most importantly, there have been various complaints about its dependence on the government and its inability to act in a non-biased manner.

With regard to the political independence of PSM, various articles stipulate that its programmes should be governed by the principles of objectivity, completeness and pluralism, respecting different viewpoints, and be objective and accurate (e.g. Art. 15(2) of the Constitution, Law 4173/2013, Presidential Decree 77/2003). When it comes to independence from political parties, however, the picture is quite different. It should be noted that with the election of New Democracy to the government in 2019, the responsibility for ERT as well as for the public news agency passed to the prime minister himself. The PSM maintains a small network of local correspondents or branches in practice. However, the size of the network has been shrinking over time and is insufficient to cover the whole country. It is also worth noting that New

16 TV ownership data is available at: <https://www.esr.gr/τηλεόραση/>

17 Antonis Grigoropoulos, 3/6/2023, phone interview; Antonis Dimitriou, 7/6/2023, phone interview; George Mixelopoulos, 10/6/2023, phone interview.

18 L. Papadopoulou, "Alternative hybrid media in Greece: An analysis through the prism of political economy," *Journal of Greek Media & Culture* 6, no. 2, 2020: pp.199-218, https://doi.org/10.1386/jgmc_00013_1; S. Papathanassopoulos, A. Karadimitriou, C. Kostopoulos, and I. Archontaki, "Greece: Media concentration and independent journalism between austerity and digital disruption," in J. Trappel and T. Tomaz (eds.), *The Media for Democracy Monitor 2021: How leading news media survive digital transformation* (Vol. 2, Nordicom, University of Gothenburg, 2021), pp. 177–230.

Democracy's press officer was appointed as ERT's president. These practices are quite common as every new government tends to appoint a new person to these positions.

Finally, with regard to the issue of content diversity, contrary to national media, local media tend to present a variety of issues and allow different voices to be heard.

Social inclusiveness - Medium risk (57%)

Greece's media landscape presents a complex picture of social inclusiveness with varying risks across different dimensions. The risks associated with public service media (PSM) providing news in minority languages are notably high. Specifically, the radio stations in the region of Western Thrace, such as ERA Komotini, do not offer national news in the languages spoken by the Muslim minority in this area (e.g., Turkish). Moreover, there is a dearth of national news in languages spoken by non-legally recognised minorities like Vlachs, Arvanites, or Slavic-speakers. This gap is not only evident in legal frameworks but also in practical implementation, emphasising a substantial deficit in the representation of linguistic and ethnic minorities in the media¹⁹.

While the PSM's approach is relatively commendable, with a low risk, as per representatives of ERT journalists, it is crucial to note that the primary focus appears to be on protecting minorities rather than actively representing them. Although the coverage is fair and fact-based, extending to various minority groups, including the Muslim community and immigrants, it suggests a commitment to factual representation while falling short of actively providing a robust platform for minority voices²⁰.

Moving to private media outlets, a medium risk is associated with their news services in some minority languages, which are delivered in a limited and irregular manner. Local private radio stations in regions with a concentration of minorities, such as Xanthi and Komotini, predominantly broadcast in Turkish, addressing the legally recognised Muslim minority²¹. A higher risk is linked to the representation of minorities in private media, raising concerns about potential bias and misleading reporting. Most minorities receive inadequate airtime, leading to distorted narratives, particularly concerning refugees and immigrants. Stereotypical language use and negative associations, such as linking immigrants to increased crime, contribute to a skewed representation, fostering fear and division²².

The risk escalates to a very high level when considering that there are no specific outlets or channels addressing marginalised groups in the country. This is a stark indication of a significant gap in media representation and engagement for marginalised communities, essentially denying them a voice and perpetuating their exclusion.

However, the scenario changes when assessing local media. Generally, they meet the community's Critical Information Needs (CINs), with low risk, and very few sporadic cases of failure. Interviews with local journalists affirm that local media are closely connected to their communities, fostering high levels of trust. Occasional lapses are attributed to resource constraints, especially the lack of personnel.

Best practices and open public sphere

In Greece, the media landscape contains commendable initiatives but also entails several risks. In terms of innovation, high risks prevail, with few organisations engaging in innovative practices²³. Notable exceptions include IMed Lab, collaborating with Aristotle University for advanced data journalism, and Inside Story, an investigative news media which champions slow journalism and which has also been interviewed

19 Prof. Konstantinos Tsitselikis, University of Macedonia, 1/6/2023, mail interview

20 Vasilis Peklaris, 2/6/2023, phone interview; Themis Beredimas, 3/6/2023, phone interview; Georgios Tsiglifysis, 2/6/2023, phone interview; Kyriakos Kortesis, 3/6/2023, phone interview

21 Prof. Konstantinos Tsitselikis, 1/6/2023, mail interview

22 Vasilis Peklaris, 2/6/2023, phone interview; Themis Beredimas, 3/6/2023, phone interview; Georgios Tsiglifysis, 2/6/2023, phone interview; Kyriakos Kortesis, 3/6/2023, phone interview

23 Reuters Institute for the Study of Journalism, Newman, N., Fletcher, R., Robertson, C. T., Eddy, K., & Nielsen, R. K., "Digital News Report 2022", 2022, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2022-06/Digital_News-Report_2022.pdf

within the LM4D project.²⁴ PressProject and Reporters United contribute to independent investigative journalism, while Efsyn stands out for its cooperative ownership. Despite these, the majority stick to conventional methods, focusing on social media for wider reach.²⁵

It is of concern that Greece lacks local citizen and civil society initiatives, with low visibility exacerbating the issue. IMEdD's Local News programme identifies 'news deserts' and probes journalists' working conditions²⁶. PressLocal, of the Journalists' Union of Macedonia & Thrace, enhances digital trade unionism²⁷, and the Regional Press Institute (RPI) promotes journalism education and research in regional press history²⁸. Limited visibility underscores the need for increased awareness and audience engagement in supporting these initiatives.

24 U. Reviglio and D. Borges, "Newsletters, Podcasts and Slow Media: Successful News Media Strategies to Engage Audiences in the Attention Economy." *Centre for Media Pluralism and Freedom*, 2023, <https://cmpf.eui.eu/newsletters-podcasts-and-slow-media/>.

25 I. Angelou, V. Katsaras, D. Kourkouridis, & A. Veglis, "Social Media Followership as a Predictor of News Website Traffic." *Journalism Practice*, 14(6), 2020, pp. 730-748. <https://doi.org/10.1080/17512786.2019.1635040>.

26 iMEdD, The Regional Press in Greece, 2023, <https://www.imedd.org/local-news/>.

27 #Press_local, "An initiative of the Union of Editors of Macedonia Thrace for work in the local media, Union of Editors of Macedonia Thrace", 2023, <https://press-local.gr/press-local>

28 The Regional Press Institute, 2023, <https://www.rpi.gr/?lang=en>



Hungary

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Context

Local government in Hungary is made up of local municipal governments, county municipalities, the metropolitan municipality and district municipalities: a total of 3,178 municipalities, each with its own mayor and representative body. The local governments operate with narrow powers, further reduced since the COVID-19 pandemic, and are economically at the mercy of the central government. Local media are essentially a budgetary issue for municipalities, with the annual budget decree setting the operational framework for municipal media.¹

There are no debates about local news deserts. However, the state of local media became the focus of professional debate after 2016, when all the county newspapers were taken over by Fidesz oligarchs and in 2018 became part of Fidesz's media conglomerate, KESMA.² The problem of "news desert" in the Hungarian media system appears in the context of the one-party dominance of Fidesz over the entire media landscape, in which freedom and diversity of information are severely limited. In the case of local media, the one party-dominance means that readers have very limited access to independent information on issues of local relevance.

Local media and community media are defined in the Media Act³, as only radio and television. There is no definition in Hungarian law applicable to the print press, online and social media. The definition of local media is based on the audience coverage, i.e. it is solely based on the geographical area covered and the size of the audience reached. The differentiation based on audience does not affect the content broadcast only the media service fee payable by the media service provider to the media authority.

Based on the Media Act, community media services are media services serving a specific social, national, cultural, or religious community or group, or serving the specific needs of the population of a particular locality, region or catchment area, to give information and access to cultural programmes, or broadcasting programmes serving the objectives of the public service media as defined in the Media Law for the majority of its broadcasting time. The community media provider does not have to pay a service fee. After 2010, when the current government first won the national election, pro-gov-

1 Law, 2011. évi CLXXXIX. törvény Magyarország helyi önkormányzatairól, 2011, <https://net.jogtar.hu/jogszabaly?docid=a1100189.tv>.

2 Mertek Media Monitor, Media Landscape after a Long Storm. The Hungarian Media Politics since 2010, Mertek.eu, 2021, <https://mertek.eu/wp-content/uploads/2021/12/MertekFuzetek25.pdf>.

3 Law, 2010. évi CLXXXV. törvény a médiaszolgáltatásokról és a tömegkommunikációról, 2010, <https://net.jogtar.hu/jogszabaly?docid=a1000185.tv>.

ernment community radio networks were created (Lánchíd Rádió, after 2015 Karc FM, since 2023 Hír FM), and churches were given radio broadcasting opportunities in this form (Catholic Radio, Maria Radio, Europe Radio). There is hardly any real community radio serving the needs of local or cultural groups.

After the regime change of 1989-1990 the state privatised county newspapers very quickly and the first foreign investors appeared in the Hungarian media market. By the early 2010s, all the county newspapers were owned by foreign investors (Axel-Springer, Ost Holding, Russmedia, Radio Bridge Media Holdings Ltd). From 2014 onwards, these publishers and newspapers were bought up by pro-government entrepreneurs, and since 2018 all county newspapers have been owned by the Central European Press and Media Foundation (KESMA).

Another traditional group of local newspapers is the local municipality-owned and financed newspaper. In many cases, these are newspapers serving local political propaganda purposes, regardless of the political colour of the municipality concerned. Although their operation is financed exclusively or predominantly from public funds, there are no guarantees, either in law or in local regulations, that impartial local information can be provided. This does not mean, of course, that all municipal newspapers serve party-political purposes.

The municipality also owns other media. The 1996 Media Law, which regulated the media framework for the first time after the regime change, still explicitly prohibited the creation of local media holding companies. Nevertheless, local television stations run by municipalities were already in operation in the 1990s. In the Hungarian market, local television does not operate commercially, which is explained by the small size of the market.

The newest players in the local news media are the small local online news sites, many created after 2016 with the help of journalists dismissed from county papers. The oldest independent local news site that has been funded through advertising and grants is Nyugat.hu. Journalists who were let go from local newspapers launched the news site Szabad Pécs in 2017 and Debreciner.hu in 2019. The importance of independent local news sites has been recognised by donor organisations, as most of the local media's funding comes from grants and donations from readers. In 2023, eight local news sites (Borsod24, Debreciner, Kecsup, Nyugat.hu, Enyugat, Szabad Pécs, Szegeder, Veszprémkukac) started closely cooperating, including content exchange (on the website szabadhirek.hu which has currently 13 members), joint tenders and other activities.⁴

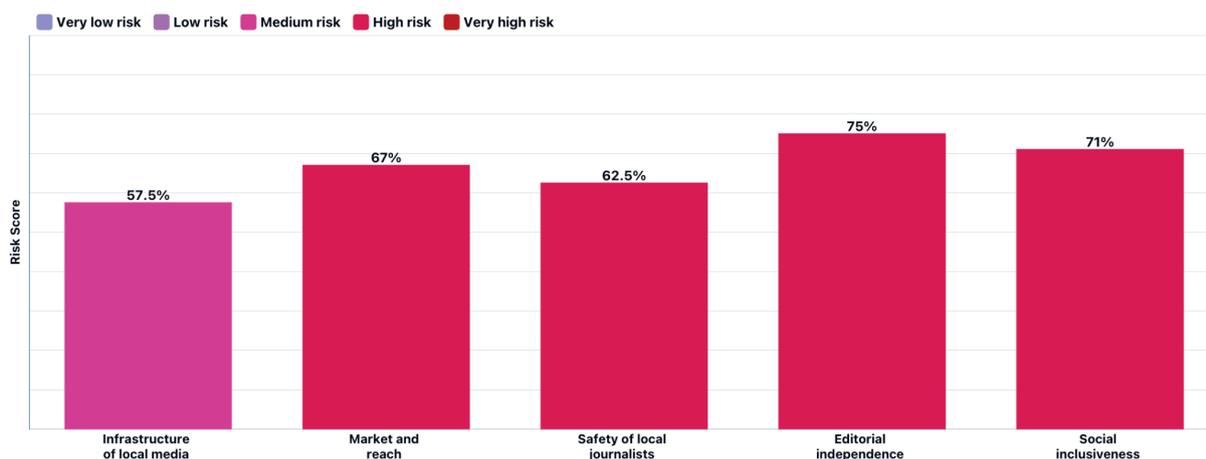
Local radio, on the other hand, started out as a very vibrant market. The first radio networks were music radio stations (Juventus Radio, Radio 1), which became real competitors of national commercial radio stations. In the second half of the 2000s, Klubrádió started operating as a networked political talk radio station. However, its network was completely shut down in 2011 under the new media law and the new media authority, and in 2020, it lost its Budapest frequency, and can only operate as an online radio.

In 2010, community radio lost its original function, and the Media Council authorised networks of political and religious radio stations under this designation.

After 2010, the new media authority, the Media Council, completely redrew the radio map. The previously well-established music networks lost their frequencies, and a growing network of religious and political radio stations took over the frequencies of the former local radio stations. The new music radio network Rádió 1 and the political talk radio network Karc FM were established in this period. In contrast, the expansion of two new music networks, Best FM and Gong FM, has been visible in recent years. These radio stations are government-controlled; *Karc FM* (since 2023 *Hír FM*) and *Gong FM* are directly owned by KESMA.

In the Hungarian local media, the phenomenon of news deserts is, therefore, not fundamentally the result of the lack of coverage of local news services in certain municipalities or regions but rather of the fact that much of the local media is under strong political influence. This is true not only for the pro-government media but also for most of the local newspapers in opposition-led municipalities. Only in those municipalities with an independent news portal or where the local government has created the conditions for the independence of the media it owns can residents find a non-partisan source of information.

⁴ Media1.hu, Összefogtak a vidéki független lapok, 2023, <https://media1.hu/2023/07/06/osszefogtak-a-videki-fuggetlen-lapok>



Granularity of infrastructure of local media - Medium risk (57,5%)

In the Hungarian media market, county newspapers are available everywhere. Most municipalities and all the districts of the capital have their local newspapers. There is no public database for municipal newspapers/websites. Still, as the number of municipalities is stable and municipalities are trying to maintain their existing media, it can be assumed that their number is relatively stable.

According to the media authority, 385 cable and 37 terrestrial local TV stations are operating in the country⁵, a low number compared to the 3,100 municipalities. Local TV is available everywhere except in the smallest municipalities. The media authority's register lists 94 local radio stations and 44 district stations. Of the local radio stations, 60 are linked to a Fidesz-affiliated or a church-owned network, i.e. only 34 are independent local radio stations.

On the local media market as a whole, there are very few independent services and press products that are not the product of a complex media company, i.e., non-municipal, non-networked services. Except for a few independent local radio stations and local online newspapers, most local media are in a situation of dependency. While this may be positive regarding the range of content, as it provides a more sustainable economic basis for local media, it is highly problematic regarding diverse and impartial local coverage.

The end of newspaper sales at post offices, the government's drain on local government resources, and significant regional disparities in internet penetration and digital literacy also significantly limit rural residents' access to local news. Outside Budapest, the county newspapers and music radio networks close to the government have the best chance of reaching audiences.

Outside Budapest, it is typically challenging to find journalists.⁶ The local editors of county newspapers tend to be older journalists, and it is difficult to find replacements.

Municipal newspapers have a small editorial staff of 3-6 people, and even fewer journalists work for independent online newspapers. In case of some municipal television stations, the municipality outsources all content production to an external company. Smaller local television stations produce very few programmes with small crews. Networked local radio stations largely maintain a technical staff, while independent local radio stations have their news editors.

In 2011, the PSM—now the Duna Media Service Provider Company providing television, radio, and

5 NMHH, Register of the National Media and Infocommunications Authority, 2023, [https://nmhh.hu/szakmai-erdekelt/nyilvantartasok?HNDDTYPE=SEARCH&name=doc&page=1&fac_provider_theme=mediafelugyelet&fld_keyword="médiaszolgáltatások nyilvántartása"&_clearfacets=1&_clearfilters=1](https://nmhh.hu/szakmai-erdekelt/nyilvantartasok?HNDDTYPE=SEARCH&name=doc&page=1&fac_provider_theme=mediafelugyelet&fld_keyword=)

6 Oživení, z.s., Transparency International, Sieć obywatelska, Mertek Media Monitor, The Crisis of Local Journalism in V4 Countries and the Specific Role of Municipal Newspapers, 2023, https://www.oziveni.cz/wp-content/uploads/2023/03/Booklet_2_interaktivni_strany_V4.pdf; Mérték Médiaelemző Műhely, Az értelmes beszéd kis szigetei – Helyi nyilvánosságok és helyi média Magyarországon, 2021, <https://www.youtube.com/watch?v=L96wqfomMA>; Mérték Médiaelemző Műhely, Büszkék lehetünk arra, hogy még létezik a helyi média, 2022, <https://mertek.atlatszo.hu/buszkek-lehetunk-arra-hogy-meg-letezik-a-helyi-media/>

online services, as well as running the only Hungarian news agency⁷—restructured by the Fidesz government, unexpectedly closed most of its regional studios.⁸ The PSM has since sourced local coverage to local television stations. It has no correspondent network of its own.

Market and reach - High risk (67%)

There is only sporadic data about the overall revenues of local media. No separate database is available for local media companies, the data can be checked by individual searches. Based on random company checks, revenue trends are rather mixed; some are decreasing, and some are increasing.⁹

The distribution of local newspapers is outsourced, at least in the larger settlements, and local newspapers are usually distributed together with commercial leaflets. In smaller municipalities, the municipality typically handles distribution itself.

The government supports local media in several ways.¹⁰ The Media Council Funding Programme (Médiatanács Támogatási Programme) sponsors local and regional television and radio stations in a tender scheme to cover their overhead costs, technical improvements or the costs of their radio or television programmes.¹¹ There were no dramatic changes in the subsidy between 2018 and 2021. 2019: +6,1% (compared to 2018) 2020: -1,1% (compared to 2019) 2021: +12,3 (compared to 2020).¹² The Media Council is not an independent organisation; all five members of the Media Council were delegated by the ruling party Fidesz.¹³ Municipalities fund or subsidise local media, and there is very mixed practice on how much political loyalty is expected. Some mayors expect loyalty from local media, and others respect the independence of local media outlets. The distribution of government advertising at the national and local levels is completely opaque. The real problem is not the amount of financial support but the lack of transparency.¹⁴

For community radio, the role of state advertising is as important as for commercial media – especially in the case of Karc Fm/Hír FM, which is owned by the pro-government KESMA conglomerate. In the case of church radio, state support is indirect through the funding of churches.

Independent local news portals are active in international competitions. Many foreign donor organisations support the work of these small, non-profit organisations. This project-based support is risky, and the implementation of projects can be to the detriment of the outlets' core activity. In addition, the media receiving these grants have been exposed for years to smear campaigns and were stigmatised by government communication as “dollar media” representing foreign interests.

No advertising data is available for the local market. Based on the national advertising data (2018-2022), only digital revenues increased in real terms (+57,2%). The decline in the print newspaper market was very strong (-33,8%), but there was also a decrease in the radio (-14,8%) and television (-5,5%) sectors in real terms.¹⁵ Paywall and crowdfunding are prevalent in national media, but local media brands are not

7 G. Polyák and Á. Urbán, Funding of the Hungarian Public Service Media - 2015, in Iris Plus, Online activities of public service media: remit and financing, <https://rm.coe.int/iris-special-online-activities-of-public-service-media-remit-and-finan/1680945613>.

8 Nyugat.hu, Leépítik az MTV regionális stúdióit, 2011, https://www.nyugat.hu/cikk/mtv_regionalis_musorok_megszunes; Delmagyar, Szegedi körzeti stúdió: “utolsó bástya voltunk”, 2015, <https://www.delmagyar.hu/szeged-es-kornyeke/2015/03/szegedi-korzeti-studio-utolso-bastyavoltunk>.

9 State, Database for annual financial reports of the companies, 2023, https://e-beszamolo.im.gov.hu/oldal/beszamolo_kereses.

10 Oživení, z.s, Transparency International, Sieć obywatelska, Mertek Media Monitor, The Crisis of Local Journalism in V4 Countries and the Specific Role of Municipal Newspapers, 2023, https://www.oziveni.cz/wp-content/uploads/2023/03/Booklet_2_interaktivni_strany_V4.pdf.

11 Media Council, Media Council Funding Programme, 2023, <https://tamogatas.mtva.hu/>.

12 National Media and Communication Authority, Parliamentary Reports of the Media Council, 2022, <https://nmhh.hu/mediatanacs-orszagguylesi-beszamolok>.

13 K. Bleyer-Simon, G. Polyák and Á. Urbán, Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report: Hungary, 2023, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), <https://cadmus.eui.eu/handle/1814/75725>.

14 K. Bleyer-Simon, G. Polyák and Á. Urbán, Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report: Hungary, 2023, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), <https://cadmus.eui.eu/handle/1814/75725>.

15 Advertising Association (MRSZ) and its co-associations, Press release of the Hungarian Advertising Association (MRSZ) and its co-association, 2023, https://mrsz.hu/cmsfiles/f0/52/MRSZ_sajtokozlemeny_2022_media-komm-tortak_FINAL_230320_EN.pdf.

strong enough to follow this model. A few independent local online sites have tried this in recent years, but background interviews show they have not generated significant revenue from these sources.

The local media market is too fragmented to calculate market share and concentration ratio (very high risk). At the same time, the county's daily newspapers are all owned by a single owner, the Fidesz-affiliated KESMA. The local radio market is dominated by pro-Fidesz radio networks. Local newspapers and local television stations are owned and maintained by the municipalities. Thus, overall, local media markets are fairly concentrated, with real competition only in those markets where independent local news portals operate.

Mérték Media Monitor and the Median Public Opinion and Market Research Institute have conducted several surveys on the Hungarian public news consumption and information patterns. In 2020 and 2023, these also included questions about how respondents inform themselves about local affairs. This shows that in 2023, 11% of respondents would be informed at least weekly by local radio, with a further 5% less frequently (same figure in 2020: 10% at least daily, 10% at least weekly and 8% at least monthly). In the case of local (municipal) newspapers, 9% were informed at least monthly and 2% less frequently (same in 2020: 33% and 10% respectively).¹⁶

The local media markets in Hungary are economically quite high-risk, as they are characterised by: the concentrated ownership of county newspapers and local radio stations; the governmental party affiliation of these dominant or monopoly owners; the discriminatory distribution of state advertising; the weak economic strength and advertising potential of the vast majority of local markets; the unpredictability of municipal funding; and the scarcity of domestic funding coupled with the constant political attacks on foreign funding.

Safety of local journalists - High risk (62.5%)

The situation for journalists working in local media is not uniform. KESMA's county newspapers guaranteed existential security until the 2022 elections, but serious cutbacks were made afterwards. No quantitative data on journalists' salaries and other working conditions was found. According to market reports, pro-government county newspapers and radio network employees work in good working conditions for competitive salaries. Local self-government owned media offer more modest opportunities, and working conditions vary with the ever-changing funding of local governments. Independent local news portals typically have editorial teams of 2-5 people. Working conditions are significantly influenced by the availability and extent of current tendering opportunities and foreign funding. Neither project-based grants nor crowd-funding allow for long-term planning and development.¹⁷ Overall, almost all local media segments are characterised by serious political and economic instability, and journalists' working conditions are unstable.

The media outlets affiliated with KESMA are just as heavily biased servants of government policy at the local level as they are at the national level. Analyses of county newspapers have also confirmed the bias of local news published in these newspapers.¹⁸

The county papers also publish national news. In this case, the content is centrally edited, and literally, the same news item appears in the county papers as in the national *Magyar Nemzet* newspaper or the free *Metropol*. These news items exclusively convey the governing party narrative. Even among municipality-owned media outlets, impartial reporting tends to be the exception, regardless of whether the municipality is controlled by the governing parties or the opposition parties. Especially in politically charged situations, the municipality's leadership uses these media outlets for political purposes, typically to promote the

16 E. Hann, K. Megyeri, Á. Urbán, K. Horváth, P. Szávai and G. Polyák, News Islands in a Polarized Media System, 2023, Mérték Media Monitor, https://mertek.eu/wp-content/uploads/2023/07/Mertek-fuzetek_30.pdf; E. Hann, K. Megyeri, G. Polyák and Á. Urbán, An Infected Media System, 2020, https://mertek.eu/wp-content/uploads/2020/12/Infected_media_system.pdf.

17 Oživení, z.s., Transparency International, Sieć obywatelska, Mertek Media Monitor, The Crisis of Local Journalism in V4 Countries and the Specific Role of Municipal Newspapers, 2023, https://www.oziveni.cz/wp-content/uploads/2023/03/Booklet_2_interaktivni_strany_V4.pdf.

18 Mérték Médiaelemző Műhely, Megyejáró: megyei napilapok elemzése – összegzés, 2019, <https://mertek.eu/2019/02/04/megyejaro-megyei-napilapok-elemzese-osszegzes/>.

mayor.¹⁹ Despite these media outlets being publicly funded, no legislation or other document guarantees impartial, balanced editorial activity. As previously analysed, the exceptions to this rule are some local newspapers (mainly Budapest district papers) where the mayor is not affiliated with any political party.²⁰ Independent local online newspapers are the most impartial forums for local information, respecting professional and ethical standards of journalism. These media outlets have been created precisely to provide an alternative to partisan local reporting, and they are fulfilling this commitment.

Physical attacks and threats against Hungarian journalists are rare. There is one such documented case involving local journalists: the staff of Nyugat.hu were threatened in a Messenger message that "on their way home, they will be hit from behind with a blunt object and then the knife will appear". The case was investigated by the prosecutor's office.²¹ Political attacks and smear campaigns have been reported by several journalists.²²

Only a few SLAPP cases are known on the local level. Requests for rectification do occur, but the number is not very high. As in national politics, the local political leadership prefers to ignore published information and opinions and is not interested in debating dubious issues. At the same time, there is no anti-SLAPP legal framework in the country, and thus meritless lawsuits can tie up considerable resources for news media.

The most significant risk for journalism is that journalists working in the ruling party media are under constant political pressure; in the municipality-owned media, there is also political pressure, coupled with economic uncertainty; and independent local news portals lack any predictable, stable funding. Journalists in the independent media face severe difficulties in obtaining information from the government and even from municipalities.

Editorial independence - High risk (75%)

The Media Law contains some conflict-of-interest rules for all media services, including for local media services. However, while formal conflict of interest rules are not violated, there is no genuine guarantee of avoiding political interference.

No rules apply to the impartial coverage in local print and online newspapers or the use of public funds.²³ As part of KESMA, the county newspapers openly and unilaterally convey the government narrative, supported by a significant amount of public advertising. This means that they have a secure funding base compared to other local media players, such as independent local media outlets, which instead are largely dependent on donations and grants. In the case of the KESMA county papers, political and economic influence are intertwined, and potential commercial advertisers—which are typically few in the Hungarian local market—often place ads in these papers for political reasons. According to the same Media Law, local media service providers must also provide balanced information in their programmes about local, national, and European events and controversial issues of public interest. However, the Media Council's parliamentary reports submitted over the last five years do not mention local media cases.

Overall, the Media Council acts in relation to infringements committed by local media. The Media Council and the National Media and Infocommunications Authority have some regional offices, but they mainly deal with telecommunications issues or supervise a specific area. They have no links with the local media in their respective cities. Problems have been detected over the years regarding the overall independence of the regulator's action.

19 K-Monitor Blog, Így használták kampányra köztisztviségüket politikusaink, , K-Monitor, 2022, https://k.blog.hu/2022/04/02/_kormanyzati_hirvel_es_polgarmesteri_tajekoztatas_koztisztssegek_es_kampany?layout=5; 24.hu, N. Gergely Miklós, Megszületett a NER-t idéző balos propaganda, de van más is – milyen tömegsajtót csinál az ellenzék közpénzből?, 2021: <https://24.hu/belfold/2021/05/28/kerulet-lap-ellenzek-kozpenz-baloldal/>.

20 D. Dercsényi, Felmérte lapunkat a Mérték, 2022, <https://jozsefvarosujzag.hu/felmerte-lapunkat-a-mertek/>.

21 Nyugat.hu, Ügyészégi határozat született a Nyugat.hu-t ért fenyegetés ügyében - a Facebook is segített megtalálni az elkövetőt, 2022, https://www.nyugat.hu/cikk/amp/ugyeszegi_hatarozat_szuletett_a_nyugat.hu_t_ert_a?fbclid=IwAR2Xp0iTryq5c6oreEziJo8hYHFvn_oRklscvhVsdgIiAX2nAyTkvSYdk.

22 I. Lozovsky (OCCRP), They Tried to Frame Us': New Assault on Hungarian Journalists Highlights Media Freedom Crisis in the Heart of Europe, 2023, <https://www.occrp.org/en/37-ccb/ccb/17408-they-tried-to-frame-us-new-assault-on-hungarian-journalists-highlights-media-freedom-crisis-in-the-heart-of-europe>

23 I. Codreanu, L. Ganea, I. Godársky, E. Hanáková, M. Klíma and K. Ras'to, Media market trends and distortions in the Czech Republic, Hungary, Romania and Slovakia, 2021, https://mertek.eu/wp-content/uploads/2021/11/Mertek-fuzetek_20.pdf.

The Hungarian PSM has no local branches, as they were closed by the Fidesz government between 2011 and 2015²⁴. Since then, local media under contract with the PSM have been delivering local news. As the political independence of the PSM as a whole has been severely compromised,²⁵ the editing of local news is not impartial.

While this is the basis for continuous political interference in editorial decisions, thanks mainly to independent local online newspapers in a few large cities, and the few remaining independent local and community radio stations, diversity has not disappeared completely from the local media.

Social inclusiveness - High risk (71%)

Based on the news programme analysis of the Media Authority, minority actors accounted for 2.5% of the news programmes (this corresponds to long-term proportions).²⁶ The proportion of Roma is the lowest in public service media (5.9%), which is much higher in commercial channels. The proportion of other national minorities in Hungary is also low (3.3%). The public service media mainly focuses on Hungarian minorities living in neighbouring countries and immigrants – the coverage of the latter being predominantly negative. The refugee crisis was portrayed in the public service television channel M1 as a security threat, the humanitarian crisis aspect was neglected. Public media programmes use the term “migrant”, not “refugee”. Migrants are portrayed in a highly negative light in public service news programmes.²⁷

The presence of minority languages in private broadcasting is not typical. There is a television with a Roma theme (Dikh TV), mainly with a musical focus. This is also in Hungarian, but there is also a Lovari language programme. Radio Dikh is a Roma radio, but news service is not included. Tilos Radio (independent community radio available on local frequency in Budapest and online) has a public affairs and cultural magazine for Roma every second week (Cékla).

Some local media outlets give a high priority to local community issues, while other media outlets do not. The municipality newspaper of Budapest 8th district was analysed in 2022.²⁸ It found that public issues (politics, local affairs, social issues) covered 55% of the content. A recent analysis²⁹ of two local newspapers in Debrecen about a planned battery factory showed the differences between municipal media and independent media. The local government news site published more articles emphasising the issue's economic, technological, or environmental aspects, and several articles were published about similar battery plants in Germany. The independent *Debreciner* covered local civic groups' opinions and reported the factory's possible consequences for the whole town. A comparative content analysis of three municipality newspapers in the campaign period before the April 2022 parliamentary election showed different editorial practices. One newspaper (in Debrecen) was seriously biased in the municipality; only the viewpoints of politicians from the ruling party could appear. The other two newspapers provided the possibility for all candidates to introduce their positions. To conclude, local media only exceptionally become the main forum for public debate, even on local issues. It is only the very few independent news portals that can address local issues effectively.

24 Delmagyar, Szegedi körzeti stúdió: “utolsó bástya voltunk”, 2015, <https://www.delmagyar.hu/szeged-es-kornyeke/2015/03/szegedi-korzeti-studio-utolso-bastya-voltunk>.

25 K. Bleyer-Simon, G. Polyák and Á. Urbán, Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report: Hungary, 2023, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), <https://cadmus.eui.eu/handle/1814/75725>.

26 NMHH, National Media and Communication Authority, 2023, https://nmhh.hu/cikk/236654/Tarsadalmi_sokszinuseg_a_hirmusorokban_2022_januar_1_december_31_.

27 É. Bognár, P. Kerényi, E. Sik, R. Surányi and Z. Szabolcsi, Migration narratives in media and social media. The case of Hungary (BRIDGES Working Papers #07), 2023: https://www.bridges-migration.eu/wp-content/uploads/2023/07/WORKING-PAPERS-BRIDGES_07_FINAL_OK_with-doi_v2.pdf; V. Messing and G. Bernáth, Infiltration of political meaning- production: security threat or humanitarian crisis? The coverage of the refugee ‘crisis’ in the Austrian and Hungarian media in early autumn 2015, 2016, https://cmds.ceu.edu/article/2016-12-13/report-coverage-refugee-crisis-hungarian-and-austrian-media-published-cmds_.

28 Mertek Media Monitor, Quantitative content analysis of Jozsefvaros municipality newspaper, 2022, <https://jozsefvaros.hu/otthon/hirdetotabla/hirek/2022/09/elkeszult-a-jozsefvaros-ujzag-ujabb-mediaelemzese/>.

29 J. Bódi, K. Horváth, I. Kovács, and Á. Urbán, Distinctive local media markets - one story, multiple perspectives, 2023, https://mertek.eu/wp-content/uploads/2023/07/Mertek-fuzetek_32-2.pdf.

Best practices and open public sphere

There are independent local online sites that are trying to play a watchdog role in challenging political and economic circumstances. Cooperation has already started between them. Nyugat.hu is the biggest independent local site, it has already launched its podcast. Debreciner, another independent local site, has regular events for the readers to enhance audience engagement.

There is an exceptional initiative, the Nyomtassteis movement, whose founder has also been interviewed for this project and discussed in a blog post.³⁰ It aims to distribute content rather than produce it. The idea was inspired by the fact that in rural areas, especially in villages, and small towns, many elderly people live without internet access: they are mainly reached by government propaganda, as most printed newspapers, radio and television are linked to the governing party. Every week, Nyomtassteis puts together a short news summary of the most essential news and tries to get it into as many people's mailboxes as possible. The system is based on volunteering: anyone can print an A4 news sheet and put it in their local mailboxes. Nyomtassteis does not focus on local news but is distributed in rural areas. Independent local media outlets are active in social media and try to be as innovative as possible. Podcasts are already relatively widespread (e.g. *Nyugat*, *Debreciner*, *Szabad Pecs*, *Veszprem Kukac*), and some media also have YouTube channels (*Nyugat*, *Kecsap*). Mecseki Muzli has a rather unique concept. It is not a news portal but provides a high-quality weekly newsletter about the city of Pecs.

30 U. Reviglio and D. Borges, Newsletters, podcasts and slow media: successful news media strategies to engage audiences in the attention economy (Blogpost published at the website of the Centre for Media Pluralism and Media Freedom), 2023, <https://cmpf.eui.eu/newsletters-podcasts-and-slow-media/>.



Ireland

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Context

Local media are an important feature of Irish life, which is reflected in high levels of public trust. Unsurprisingly, there is considerable concern about threats to local media and the implications for social cohesion and democracy. The potential for "news deserts" has been raised at parliamentary hearings, at academic conferences, and by the National Union of Journalists.¹

In 2020, a Future of Media Commission was established to investigate how media can remain "viable, independent and capable of delivering public service aims."² Although the term "news deserts" is not used in the final report, it makes specific recommendations for funding schemes for coverage of local councils and local courts.³ However, the recommendations are underpinned by a "platform neutral approach to supports for media",⁴ which means the schemes may not necessarily deliver benefits for local media outlets.

Despite its recognised role in Irish life, it is notable that local media are not formally defined. In contrast, the media regulator has a policy on community media⁵, which are defined as community-owned and not-for-profit outlets. Local media occupy an ill-defined space between community and national media and the concept is further complicated by the rise of news-oriented websites and social media. Arguably, the failure to define local media may impede recognition of emerging news deserts.

Currently, there is little evidence of news deserts in Ireland. Typically, local media cover a specific county and cater to the rural, suburban, and urban areas of that county. The Future of Media Commission noted that each county is served by a local newspaper and, outside Dublin, local radio often accounts for the majority-share of radio listenership. While this situation sounds positive, the reality may not be so healthy as local media encounter many challenges. Nevertheless, it is the rapidly growing suburbs of Dublin city that are at most immediate risk of being news deserts. These suburbs lack a media presence commensurate with their size. Many were served by "free newspapers" that often prioritised entertainment and local events rather than news. In the suburbs of North County Dublin, these and related outlets have closed down, which makes this area a news desert.

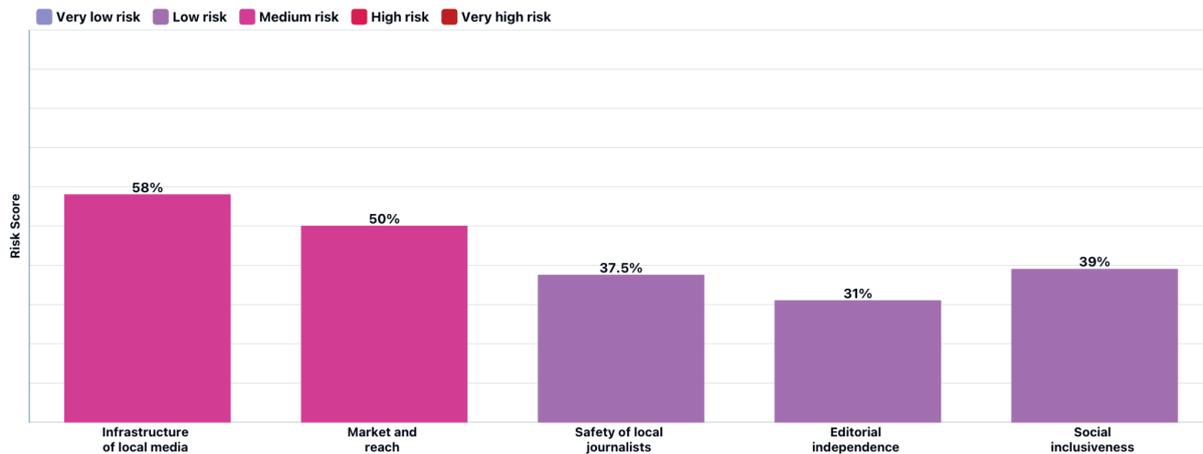
1 National Union of Journalists, DM2023: News Recovery Plan, 2023, <https://www.nuj.org.uk/resource/dm2023-news-recovery-plan.html>.

2 The Future of Media Commission website, <https://www.gov.ie/en/campaigns/54a35-the-future-of-media-commission/>.

3 All but one of the 50 recommendations are being implemented by the relevant government department and the media regulator.

4 Future of Media Commission, Report of the Future of Media Commission, 2022, <https://www.gov.ie/en/publication/ccae8-report-of-the-future-of-media-commission/>.

5 Broadcasting Authority of Ireland, Community Media Policy, 2021, <https://www.bai.ie/en/bai-launches-community-media-policy/>.



Granularity of infrastructure of local media - Medium risk (58%)

The granularity of infrastructure of local media is assessed as medium risk. Given the small size of Ireland, the infrastructure of local and community media is not overly granular. Local media are often aligned to a particular county⁶ and serve the rural, suburban, and urban areas of that county. Historically, there has been a deep connection between local media and the communities they serve. Consequently, the erosion of independent, locally-owned media is considered to be “a threat to community life.”⁷ Factors include: declining salaries for journalists, declining news coverage, and the high cost of accommodation and living. According to a 2022 survey, 60% of people under the age of 35 cannot afford to live in the community they would like to live in.⁸ These stark conditions have major implications for local journalism as it has been practised historically.

The public broadcaster, RTÉ, has failed to maintain regional correspondents at a time of population growth. Although it has a statutory duty “to establish, maintain and operate ... community, local, or regional broadcasting services”⁹, current and former staff claim insufficient resources were allocated for regional coverage and regional correspondent jobs have gone unfilled.¹⁰ Notably, the role of Dublin correspondent has remained unfilled for more than a year.

As noted, Dublin and its suburbs are potential news deserts given rapid population growth and a lack of dedicated news coverage. In 2015, a new online and print outlet, the *Dublin Inquirer*, was founded to address this gap. It represents a substantial effort to report on council meetings and issues of relevance. In contrast, some digital-only outlets operate as a subsidiary of a major UK media group to provide superficial “live news updates” for cities.

Market and reach - Medium risk (50%)

Market and reach is a medium risk. According to the Irish Media Ownership database¹¹ 26 of the 61 local titles (print and online) represented by the Press Council are owned by just two companies: the UK-based Iconic Newspapers and the Dutch-based Mediahuis. Mediahuis also operates a national weekday and Sunday paper. Of the 31 local and regional radio stations listed in the database, there is some concentration and cross-ownership. For example, Bauer Media Group and Wireless both operate six stations each.

6 The island of Ireland is divided into thirty-two counties with twenty-sixty in the Republic of Ireland. These counties are a major source of personal identity.

7 National Union of Journalists, Threat to diversity threatens community life, 2022, <https://www.nuj.org.uk/resource/threat-to-diversity-threatens-community-life.html>.

8 S. Murray, Almost two thirds of under-35s can't afford to live in their chosen community, *Irish Examiner*, 2022, <https://www.irishexaminer.com/news/arid-40947479.html>.

9 Irish Statute Book, Broadcasting Act, 18/2009, <https://www.irishstatutebook.ie/eli/2009/act/18/enacted/en/html>.

10 E. Dalton, RTÉ's regional reporting teams hollowed out at same time as secret payments, journalists claim, *TheJournal*, 2023 <https://www.thejournal.ie/rte-pay-scandal-staff-6104791-Jun2023/>.

11 Media Ownership database website, <http://www.mediaownership.ie/>.

Citing the representative body for local newspapers (Local Ireland), the Future of Media Commission reported that circulation has fallen by 55% since 2008. However, it noted that online reach has significantly expanded the audience in some cases. No comprehensive data is available on this. The past decade has seen restructuring and consolidation in the printing and distribution sectors. Mediahuis recently entered the Irish market and owns ten local titles. It closed printing operations, operates its own nationwide transport network, and plans to phase out all print within 10 years.¹² Other publishers note unfavourable retail conditions as retail multinationals have decimated local shops.¹³

Irish data for the Reuters Digital News Report indicate that the reach of local radio news has declined slightly from 14% in 2019 to 11% in 2023¹⁴. Overall, however, local radio remains popular and has featured consistently among the top-ten most popular sources of news. In contrast, local newspapers are the 18th most popular source of news. Since 2008, the number of employees in the local print sector has halved and 17 local newspapers have ceased publication. Representatives of the radio sector assert that it is challenging to fill roles in journalism in Ireland's current climate (full employment, high cost of living).

It is difficult to assess the financial sustainability of local media given the disrupting influence of Covid-19 and the unclear impact of planned measures and funding schemes for news media. Nevertheless, there are reports causing concern from the industry associations that represent local radio (Independent Broadcasters of Ireland) and local newspapers (Local Ireland). Local Ireland reports that more than 90% of all advertising revenue for local and regional newspapers comes from local businesses.¹⁵ There was a dramatic fall in revenue during the pandemic (a 22% decline on average), which was offset by Covid-related government advertising.

Local radio broadcasters reported comparable falls in advertising during the pandemic. The total Irish advertising market contracted by 40% between 2008 and 2012, with the radio market suffering a drop of 45%. They believe they are disadvantaged because they compete with the public broadcaster, which can raise money through commercial advertising and sponsorship. There are also restrictions on the volume of advertising that local broadcasters can carry. However, no local radio station has closed in the past five years, thanks in part to government support during Covid-19. The Future of Media Commission notes that: "while the loss of advertising revenues is a serious problem in itself for print, radio and TV media in Ireland, the wider implications are that significant revenues which previously would have been reinvested into content production and journalism in Ireland are now flowing out of the economy."¹⁶

According to the Reuters Digital News Report 2023, 15% of Irish respondents paid for online news. Of these, 6% reported paying for local news. Considering Ireland's position in the English language market, there is a very wide range of subscription media available and data indicates that a significant slice of digital media spend goes to US and UK titles.

The community media (radio and television) sector in Ireland is diverse in its size and reach and is typically not-for-profit. The Future of Media Commission described the sector as having a challenging financial situation and proposed the development of a Community Media Fund, which will be implemented in 2024.

Safety of local journalists - Low risk (37,5%)

Safety of local journalists is a low risk. Journalists in Ireland benefit from legislation that guarantees minimum wages, regulates open-ended contracts, and sets rules for dismissal procedures, unemployment benefits, and leave entitlements. However, amid soaring accommodation and living costs, the working

12 A. Healy, Mediahuis to phase out daily newspaper printing within 10 years, *Irish Examiner*, 2023, <https://www.irishexaminer.com/business/companies/arid-41107771.html>.

13 opic Newspapers, Submission to the Future of Media Commission, 2020, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/223520/a3691d25-b6e8-4ce8-9d88-5c26649138f3.pdf#page=null>.

14 C. Murrell et al, Reuters Digital News Report Ireland. Coimisiún na Meán, 2023, https://www.cnam.ie/wp-content/uploads/2023/06/20230609_DNR-Final-Report_STRICT-EMBARGO-00.01-14-June-23_FINAL.pdf.

15 NewsBrands Ireland and Local Ireland, Pre-Budget Submission to the Department of Finance, 2022, <https://newsbrandsireland.ie/im/2022/07/vat.pdf>.

16 Future of Media Commission, Report of the Future of Media Commission, 2022, p. 98, <https://www.gov.ie/en/publication/ccae8-report-of-the-future-of-media-commission/>.

conditions for journalists are not favourable. The National Union of Journalists¹⁷ represents workers across all media sectors including local, community, and freelance journalists. It appears effective in representing its members and is regularly called upon in media coverage to defend media freedom and the rights of journalists. The NUJ has highlighted pay disputes with employers and bogus self-employment contracts¹⁸.

There are no published figures to ascertain whether spurious legal cases (i.e., SLAPPs) against local media are common or occasional. However, given Ireland's strict defamation laws, SLAPPs are a recognised problem and a noted threat to media freedom. A report for the International Press Institute found that "legal intimidation affects the full range of Irish media, from the smallest shoestring podcasts and magazines to major broadcasters."¹⁹ All the Irish reports listed on the Platform to Promote the Safety of Journalists²⁰ concern defamation cases and the number of alerts has increased. In addition, there are significant reports of the online abuse of journalists, but not physical attacks. The government is implementing an anti-SLAPP legal framework as part of a wider (and long awaited) reform of defamation laws. A draft bill was published in 2023.

Editorial Independence - Low risk (31%)

There is currently no legislation aimed at preventing ownership control by political actors. However, there is no suggestion that the media are subject to political interference. This concurs with the assessment of the Irish chapter of the Media Pluralism Monitor.²¹ Nevertheless, in terms of risk, it is notable that government intervention in the media sector is increasing, which emphasises the need for transparent and fair procedures.

By looking at the reality of distribution of indirect state subsidies, from January 2023, newspapers and news periodicals, including digital editions, are subject to a 0% VAT rate. Previously, Ireland had one of Europe's highest rates of tax on newspapers (9%). There are some rules regarding what kind of entity qualifies for the 0% VAT rate. For example, electronic publications devoted to advertising are excluded. In terms of direct subsidies, the media regulator oversees the Sound and Vision²² funding scheme, which is open to all media producers, including local and community broadcasters. The scheme has rules about eligibility and publishes a list of the amounts awarded to different outlets and producers. This scheme specifically excludes news in favour of "programming that reflects Irish culture, history, language and diversity". For example, a local radio station could apply for public funds to make a documentary about gardening, but not about news or politics.

Arising from the recommendations of the Future of Media Commission, the media regulator will oversee two local reporting schemes. According to the government minister in charge of media, "the local democracy reporting scheme will help local media keep the public informed on areas such as regional health forums, joint policing committees and local authorities, among other areas. ... Likewise, the courts reporting scheme will enable improved reporting from local, regional and national courts."²³ However, the proposed schemes are "platform neutral", which means there is no guarantee the funding will go to local media or that local media will be well-positioned to apply. So far, it is not possible to report on fairness and transparency of their distribution.

17 The National Union of Journalists (NUJ) predates Irish independence from Britain. It represents journalists from both Britain and Ireland and includes a national council for Ireland.

18 National Union of Journalists, DM2023: Ireland, 2022, <https://www.nuj.org.uk/resource/dm2023-campaign-against-bogus-self-employment-in-ireland.html>.

19 N. O'Leary, Ireland: How the wealthy and powerful abuse the legal system to silence reporting, International Press Institute, 2023, <https://ipi.media/ireland-how-the-wealthy-and-powerful-abuse-legal-system-to-silence-reporting/>.

20 Council of Europe, Platform to promote the protection of journalism and safety of journalists, <https://fom.coe.int/en/accueil>.

21 R. Flynn, Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report: Ireland, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, https://cadmus.eui.eu/bitstream/handle/1814/75726/Ireland_results_mpm_2023_cmpf.pdf?sequence=1&isAllowed=y.

22 A. Molloy, Sound & Vision Broadcasting Funding Scheme Round 52 Open, 2024, <https://www.cnam.ie/category/sound-vision/>.

23 Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (Deputy Catherine Martin), Report of the Future of Media Commission: Statements, 2022, <https://www.oireachtas.ie/en/debates/debate/seanad/2022-09-15/13/>.

State advertising rules are unclear. There is no legislation defining the procedures for state advertising and no public register of how such advertising is distributed. The annual Liberties Rule Of Law Report 2023 notes that greater clarity is needed regarding the criteria and processes that determine which media outlets receive state/public advertising.²⁴ Moreover, the report raises concerns about the use of commercial brokers to place advertisements on behalf of the state and state agencies. In particular, “one agency is owned and controlled by a company which itself owns a significant number of regional newspaper titles.”²⁵

Although journalistic content is generally separate from advertising in many/most outlets, the local media sector is heavily dependent on local businesses for advertising. For example, Local Ireland, the body representing local newspapers, notes that before the pandemic, 91% of the advertising revenue for local and regional newspapers came from local businesses. There is no academic research to ascertain whether there is undue commercial influence. As such, one may conclude that there are risks, which could be mitigated by greater transparency, while self-regulatory mechanisms in place would benefit from more explicit safeguards.

While there are no laws to safeguard editorial independence, print/online media are subject to self-regulation if they are members of the Press Council. The Press Council upholds standards – set out in a Code of Conduct – and deals with complaints from the public. Of the 527 complaints reported by the Press Council in 2021²⁶ (the most recent report), only 25 are related to local news publications. Newspapers are not obligated to be impartial and some have political leanings, but political interference is not common. Journalists working for radio are bound to rules overseen by the media regulator, Coimisiún na Meán. It regulates all content by Irish-licensed broadcasters, both public and commercial. However, the PSM does not operate any local divisions.

In addition to processing complaints about broadcasts, the regulator monitors broadcast content for compliance with broadcasting codes and rules. For example, the Code of Fairness, Objectivity and Impartiality²⁷ deals with matters of fairness, objectivity and impartiality in news and current affairs content. Broadcasters are bound by strict impartiality rules during periods of elections or referendums. Of the 75 complaints made to the media regulator in 2022, only six concerned local/community radio and only one of these was upheld by the regulator. There is a general consensus that the regulator is fair and independent. While complaints alone are a crude measure of standards, it nevertheless appears that local journalists and local media generally adhere to good standards.

Given the small size of Ireland, there are no local branches of the PSM. The national PSM is bound to an impartiality code for news and current affairs. Complaints about breaches are heard by the media regulator. Currently appointments to PSM boards are exclusively determined by the Minister for Communications and partially subject to the advice of a government committee on media. It is not clear that these decisions are debated by the committee (i.e., on the public record) and there is little to no transparency surrounding how individuals are selected for appointment.

In general, local media provide a diverse range of content in terms of what is covered and whose voices are heard.

24 Liberties Rule Of Law Report 2023, 2023, <https://www.liberties.eu/en/campaigns/rule-of-law-report-2023/158>.

25 Liberties Rule Of Law Report 2023, 2023, p. 34, <https://www.liberties.eu/en/campaigns/rule-of-law-report-2023/158>.

26 Press Council of Ireland, 2021 Annual Report of the Press Council of Ireland and Office of the Press Ombudsman, 2022, <https://www.presscouncil.ie/press-council-of-ireland/press-releases-and-annual-reports/press-releases/2021-annual-report-of-the-press-council-of-ireland-and-office-of-the-press-ombudsman>.

27 Broadcasting Authority of Ireland, BAI Code Of Fairness, Objectivity And Impartiality In News And Current Affairs Implemented, 2013, <https://www.bai.ie/en/bai-code-of-fairness-objectivity-and-impartiality-in-news-and-current-affairs-implemented/>.

Social inclusiveness - Low risk (39%)

Social inclusiveness is a low risk. Historically, local media have played a central role in Irish life and demonstrated a strong connection to the communities they serve. This is reflected in high levels of trust.²⁸ Local media are among the top-five most trusted news outlets with 70% trusting local radio and 69% trusting local newspapers. This is especially notable given the wide range of national and international media available in the English-language market.

Maintaining this trusted connection between local media and communities is vital²⁹ at a time when the composition of communities is changing as the result of population growth, immigration, and housing developments. However, it is clear that resources (including personnel) are limited, which influences coverage of important issues. Many newsrooms are more dependent on press releases and stories that can be gathered cheaply. This comes at the expense of important, local stories that require time and the in-person presence of reporters on the ground.

There are statutory obligations on the PSM outlet, RTÉ, regarding the official languages of the state beyond English: Irish/Gaelic and Irish Sign Language. Radio stations in other languages, beyond PSM, are obligated to broadcast in Irish for a minimal amount of time. This often includes a news broadcast. Beyond Irish, there is no obligation to broadcast in the languages of minority groups. Nevertheless, non-profit community media tend to be more proactive; an online community station in County Galway operates through 11 languages³⁰. Notably, a Polish community group³¹ intended to set up community TV channel broadcasting in Polish, but opted to set up a YouTube channel instead of following the official licensing requirements. Beyond broadcasting, there are some free newspapers published in Russian (Nasha Gazeta), Lithuanian (Lietuvis), and Polish (Nasz Glos). These are distributed across towns and cities in different parts of the country. There is evidence of some local outlets publishing content in minority languages, although it is not required or widespread. In addition, research into the attitudes of first-generation Nigerian and Polish migrants highlighted issues with negative stereotyping (e.g., perceived racial stereotyping) and a desire for more space to have their voices heard in news media.³² Overall, the media were considered useful in helping some minority groups to understand events.

Community media often address marginalised groups in keeping with their ethos. Some national outlets do address marginalised groups with dedicated programming, but this is either relatively new or niche. The PSM no longer provides a dedicated weekly radio programme for people with disabilities and there is no programme dedicated to women, Travellers, or other marginalised groups. In contrast, traditional media have begun to offer more specialised content. For example, a national newspaper has recently developed a women's podcast, but the reach is not clear.

Campaigners in the areas of disability, gender, and ethnicity have focussed on increasing access to media including access to production jobs and access to exposure for expert sources. For example, Women on Air³³ is an initiative to increase the visibility of female experts and to provide media training for women.

The Future of Media Commission made a number of recommendations to promote equality, diversity and inclusion (EDI) in media, including: (i) Public Service Media should have a statutory obligation, by 2024, to gather and publish diversity data and (ii) diversity boards that advise producers on, and assist in, the co-creation of content should be created. These recommendations will be implemented in the coming year.

28 C. Murrell et al., Reuters Digital News Report Ireland, Coimisiún na Meán, 2022, <https://fujomedia.eu/digital-news-report-ireland-2022/>

29 National Union of Journalists, Threat to diversity threatens community life, 2022, <https://www.nuj.org.uk/resource/threat-to-diversity-threatens-community-life.html>

30 Galway Online Community Radio, <https://www.gocomradio.ie/about-us/>

31 K. Masterson, Lights, camera, action for the Midlands Polish Community, Changing Ireland, 2023, <https://www.changingireland.ie/lights-camera-action-for-the-midlands-polish-community/>.

32 D. Wheathley and L. Rubio, Attitudes towards news media in Ireland: Perspectives from Nigerian and Polish migrants, The Broadcasting Authority of Ireland, 2023, <https://www.bai.ie/en/new-research-explores-nigerian-and-polish-migrant-attitudes-to-news-media-in-ireland/>.

33 Women on air website, <https://womenonair.ie/>.

Best practices and open public sphere

It is difficult to collate the range and scale of innovation in the community and local media sectors. Innovations may not be documented or visible beyond the immediate environment. Innovations among hyperlocal media are even harder to observe. Consequently, efforts to map innovation are necessarily incomplete. For example, Project Oasis³⁴ identifies 10 independent, digital-native, news organisations in Ireland. Of these, only three cater to a local audience: *Dublin Inquirer* (Dublin), *Tripe+Drisheen* (Cork), and *Donegal Daily* (Donegal).

In some cases, outlets are experimenting with innovative ways to serve audiences. For example, Radio Kerry partnered with the Open Doors Initiative³⁵ to develop the Speak Up training programme for marginalised groups. More generally, innovation in the radio sector is aided by Learning Waves,³⁶ a training and networking hub for radio. In the print sector, the Dublin Inquirer³⁷ took the unusual step of launching a print edition. The outlet works with local artists to create striking cover images that capture aspects of city life.

34 Project Oasis website, <https://projectoasiseurope.com/>.

35 Open Doors Initiative, Radio Kerry and Open Doors Initiative Speak Up Training Programme for marginalised communities, <https://www.opendoorsinitiative.ie/Speak-Up-Training-Programme>.

36 Learning Waves website, <https://www.learningwaves.ie/>.

37 Dublin Inquirer website, <https://dublininquirer.com/>.



Italy

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Context

In Italy, there is no explicit debate focused specifically on local news deserts. There is a broader discussion concerning the state and the viability of local media outlets, but terms such as "desertification" or similar terminology are not commonly used in this context. The primary concern lies not in the sheer number of media outlets, but rather in their financial sustainability.

Policymakers and industry professionals recognise the importance of sustaining local media for the sake of democracy and pluralism. The debate, however, is sometimes blurred since Italian laws and regulations have rarely provided explicit and general definitions of "local media". The reason being that Italian local media can be municipal, provincial, regional or multi-regional media outlets.

Generally, experts describe the conditions of local media in Italy as "critical." Local media outlets fiercely compete for a significantly declining source of revenue. On the one hand, citizens traditionally show a relatively low willingness to pay for information. On the other, the majority of media activities have shifted online, where advertising serves as the primary source of revenue.¹ Consequently, fierce competition arises to secure a share of advertising investments crucial for the survival of media outlets.² Moreover, with most news companies transitioning to online platforms, the competition now extends to an inter-industry level.³ For example, the websites of local newspaper publishers compete with those of local broadcasting companies.

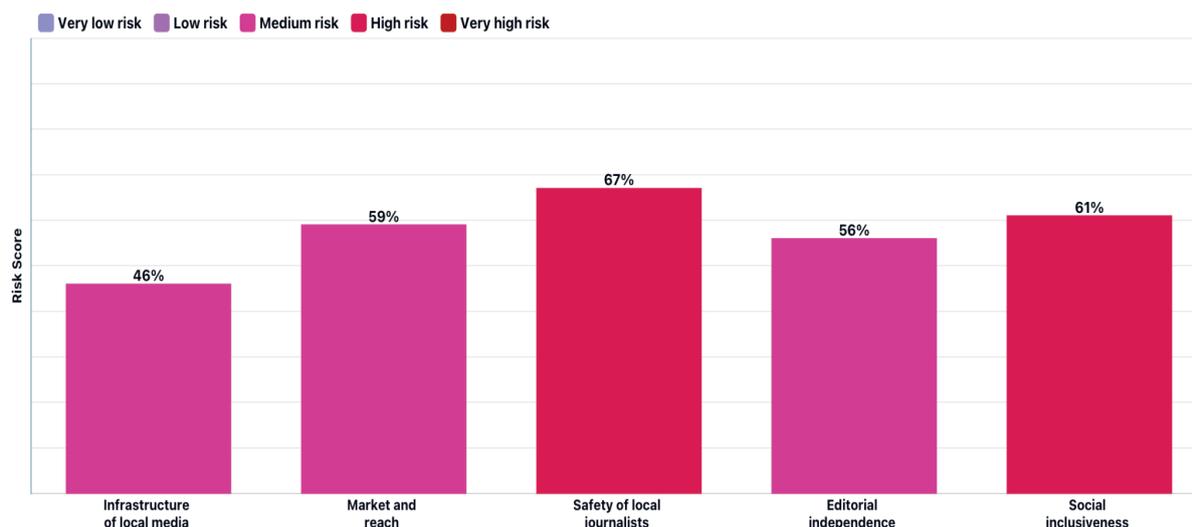
Community media are probably better defined in laws and regulations than local media,⁴ since the local or ultra local dimension of community media is quite established in both academic debates and institutional contexts. In addition, a clear definition of community media serves to project the public support of these outlets. Based on interviews with media experts, Italian community media have not developed in the last two decades. While a few successful experiences can be observed, they appear to be isolated cases amidst a sea of unsuccessful ventures.

1 AgCom, 'Indagine conoscitiva sull'informazione locale', 2018. <https://www.agcom.it/indagine-conoscitiva-su-informazione-locale->.

2 R. Carlini, M. Trevisan, E. Brogi, '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: Italy', Centre for Media Pluralism and Freedom, European University Institute, 2023. <https://cmpf.eui.eu/media-pluralism-monitor-2023/>.

3 Autorità per le Garanzie nelle Comunicazioni (2021). Sistema dell'informazione: documento conclusivo della prima fase di consultazione pubblica. <https://www.agcom.it/osservatorio-sul-giornalismo-iii-edizione>.

4 Art. 2, legislative decree n.117/2005.



Granularity of infrastructure of local media - Medium risk (46%)

The rationalisation of broadcasting services, including television and radio, has tended to favour larger and more established media companies. This process complicates the survival of small media outlets and raises concerns about certain areas being left without sufficient media coverage. However, the presence and offer of local media services varies greatly across both the national territory and different media formats.⁵

In general, urban areas have a wide range of media outlets available to residents, including newspapers, TV and radio stations, and community media in larger towns. However, the situation varies significantly, particularly regarding community media, which often face challenges in achieving economic and financial stability. Furthermore, the official data prevent a clear assessment of the viability conditions that these media face. In the case of online newspapers, there is an overabundance of information outlets, primarily concentrated in urban areas. This overabundance poses a risk of leaving rural areas without adequate news coverage and access to information. In certain regions like Trentino Alto Adige, rural areas are adequately served by local media outlets. However, in other areas such as Calabria, the number and reach of local media outlets are much more limited, leading to a critical situation.⁶

Suburban areas generally receive coverage from television and radio broadcasting outlets, as well as online media, due to the high internet penetration in the outskirts of towns and cities. However, the distribution of print press is diminishing, which is a trend not limited to suburban areas but also observed in the centres of towns and cities.⁷

The count of local media journalists has declined by approximately 50% since 2008/2009, following the global economic and financial crisis.⁸ Furthermore, there is a noticeable reduction in the presence of journalists in rural and small urban areas. Conversely, there has likely been an increase in the number of freelance or unregistered journalists operating in the field.

RAI (*Radiotelevisione Italiana*), the Italian PSM, operates terrestrial and subscription television channels as well as radio stations, and is legally mandated to ensure radio and television broadcasting across the entire country, including all regions and autonomous provinces such as Trento and Bolzano. In line with this, RAI has established 21 regional offices. However, it has been observed that the editorial content of

5 A. Mangani and B. Pacini, 'Technological transition and market structure: The switchoff and local television in Italy', *Journal of Digital & Media Policy*, 13 (2), pp. p. 297 - 316, 2022. https://intellectdiscover.com/content/journals/10.1386/jdmp_00067_1; A. Mangani, 'Come sta l'informazione locale?: le testate locali italiane dopo vent'anni di rivoluzione digitale', *Economia e società regionale*, v. 1, 2022, <https://www.torrossa.com/it/resources/an/5314580>

6 Anonymous sources, online interviews between May and September 2023.

7 Autorità per le Garanzie nelle Comunicazioni, 'Sistema dell'informazione: documento conclusivo della prima fase di consultazione pubblica', 2021 <https://www.agcom.it/osservatorio-sul-giornalismo-iii-edizione>

8 Anonymous sources, online interviews between May and September 2023.

RAI's regional information provision tends to be centred around the respective regional "capital" city.⁹ As a result, other provinces within the regions may not receive adequate coverage in terms of news and information.

The main Italian news agency, ANSA, also has considerable distribution across the national territory.¹⁰ They operate 22 regional offices (Italy having 20 regions), although there is a lack of information regarding specific changes in the number of journalists within each ANSA regional branch.

Market and reach – Medium risk (59%)

The number of local newspapers, both in print and online formats, has increased since the beginning of the century. On the other hand, there has been a steady decline in the number of kiosks: today, 25% of municipalities do not have a kiosk, and 30% have only one.¹¹ In the case of online media, the distribution of media products depends on the internet penetration in different areas. The number of local TVs and radio stations has declined. Following the switch off period between 2008 and 2012, the allocation of private and public resources has favoured more structured and larger companies to streamline the previously fragmented and dispersed local television services.¹²

Precise and reliable data regarding market shares are currently unavailable. In the case of print newspapers, most towns in Italy have one or two dominant newspapers, indicating a relatively high level of concentration. However, these oligopolistic players face competition from online information platforms. The television and radio broadcasting markets exhibit a similar level of concentration, but their significance as news providers is steadily diminishing as younger generations increasingly turn to online sources for information.¹³

There exists notable diversity within various media sectors in terms of demand. Regarding TV and radio services, the audience primarily comprises individuals born before 1970. Younger generations, though more inclined to invest in content, have gravitated away from conventional and local broadcasting platforms. In the case of the local press, recent estimates reveal a slight increase in the willingness to pay compared to previous years, but the reach of local press (both print and online) has experienced a significant decline in recent years.¹⁴

As a consequence, the revenues of local media have been experiencing a downward trend (high risk). While the situation remains heterogeneous across the industry, few local media outlets have witnessed a recent increase in revenues.¹⁵ In the local print and online press markets, the proliferation of new outlets has led to a reduction in advertising revenues for each individual outlet. On the other hand, advertising revenues in the TV and radio broadcasting sector have remained relatively stable between 2018 and 2022. In the advertising market, local media outlets face competition from platforms such as Google, Facebook, and Instagram, which offer advantageous conditions for advertisers, including the ability to reach their target audience and lower prices (high risk).¹⁶

9 Autorità per le Garanzie nelle Comunicazioni, 'L'informazione locale in Italia: il ruolo del servizio pubblico', 2021: https://www.agcom.it/documentazione/documento?p_p_auth=fLw7zRht&p_p_id=101_INSTANCE_FnOw5IVOIXoE&p_p_lifecycle=0&p_p_col_id=column-1&p_p_col_count=1&_101_INSTANCE_FnOw5IVOIXoE_struts_action=%2Fasset_publisher%2Fview_content&_101_INSTANCE_FnOw5IVOIXoE_assetEntryId=8188041&_101_INSTANCE_FnOw5IVOIXoE_type=document-

10 <https://www.ansa.it/>

11 Sindacato Nazionale Autonomo Giornalai, 'Oltre l'80% degli italiani ritiene importante l'informazione in edicola', 27 March 2023 <https://www.snagnazionale.it/default.php?t=news&id=1140>.

12 AGCOM, Elenco Pubblico degli Operatori di Comunicazione, <https://www.agcom.it/elenco-pubblico>. Confindustria Radio Televisioni, 'Studio Economico Settore Radiotelevisivo Privato Italiano 27° Edizione'. 2022 <https://confindustriaradiotv.it/studio-economico-tv-3/>; AGCOM, 'Sistema dell'informazione: documento conclusivo della prima fase di consultazione pubblica', 2021. <https://www.agcom.it/osservatorio-sul-giornalismo-iii-edizione>. A. Mangani, 2022; A. Mangani and B. Pacini, 2022.

13 R. Carlini, M. Trevisan, E. Brogi, 2023.

14 A. Cornia, 'Digital News Report- Italy', Reuters Institute, University of Oxford, 2023: https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf.

15 Autorità per le Garanzie nelle Comunicazioni (2023), Focus Bilanci 2017-2021, <https://www.agcom.it/focus>; R. Carlini, M. Trevisan, E. Brogi, 2023; Confindustria Radio Televisioni, 2022. R. Congiu, 'Cosa si stanno inventando i giornali locali', 11 February 2021, <https://www.ilpost.it/2021/02/11/giornali-locali-italia/>.

16 Confindustria Radio Televisioni, 2022; Autorità per le Garanzie nelle Comunicazioni, 2021, <https://www.agcom.it/osservatorio-sul-giornalismo-iii-edizione>

The support for local media can come from either the central state or the regional governments since each region has the autonomy to establish specific forms of support. In recent years, numerous Italian regions have provided various forms of support to local media, with the level of support remaining relatively consistent over time (low risk). Nevertheless, this support varies significantly across regions.¹⁷

In addition, the process to obtain public support involves high bureaucratic costs, appeals, complaints, and other factors that introduce uncertainty into the support system. This means that some media outlets, particularly those with limited staff, choose not to apply for public support. In general, the effectiveness of financial public support is questioned for two reasons. First, the objectives of public intervention are not clearly defined, leading to ambiguity. Second, the distribution of funds is based on the number of journalists in each outlet, which tends to favour larger metropolitan media outlets and increases concentration at the local level. This can disadvantage smaller media outlets operating at the provincial and municipal levels.

The central state's financial support for local media has experienced a slight increase in recent years. However, due to the highly fragmented nature of the editorial and broadcasting system, public support is also fragmented. Consequently, it becomes challenging to identify precisely which entities have benefited the most or encountered difficulties in this regard.¹⁸

Community media, like other local and national media outlets, face challenges in generating revenues. There is a lack of reliable data regarding their "private" sources of revenue, not least because community media are not obligated to file financial statements. The national government provides grants to community media, primarily TV and radio stations: 50% of the funding dedicated to community broadcasters is distributed equally among all eligible beneficiaries, while the other 50% is based on merit criteria concerning, in brief, the number of employees and journalists. In the last five years, the community radio and television stations that applied for support were, respectively, around 300 in each sector. The percentage of those that ultimately receive funding after evaluation typically hovers around 80% and the total amount of financial support hovers around five million euros for community televisions and community radio stations (each). Broadly speaking, the resources allocated may not always be sufficient to meet the needs of all community media organisations.¹⁹ Additionally, the dispersion of community media outlets across different regions and localities means that the support may not reach all the initiatives equally.²⁰

Generally, there are no substantial funding sources specifically dedicated to promoting innovation in local media. From this perspective, public funding is sometimes regarded as outdated, as it primarily focuses on digitising the production and distribution of media content. In addition, crowdfunding experiences have been deemed largely unsuccessful.²¹

Safety of local journalists - High risk (67%)

While there may be good working conditions for established journalists with a permanent position, there has been an increase in workload due to downsizing and a reduction in the division of labour. This situation has affected young journalists who often face poor working conditions and the competition of retired journalists who continue working without compensation. Freelance journalists play a crucial role in sustaining the local press, but frequently face unfavourable working conditions, especially in online media outlets (very high risk). Media outlets pay freelance journalists on a per-piece basis, which depends on the significance of the media outlet, the complexity of the journalistic task, the length of the piece, and numerous

17 Governo italiano, Dipartimento per l'informazione e l'editoria <https://informazioneeditoria.gov.it/it/attivita/misure-di-sostegno-alleditoria/contributi-erogati/>; <https://www.mimit.gov.it/index.php/it/contributi-emittenti-locali/graduatorie#tv-comunitarie>; R. Carlini, M. Trevisan, E. Brogi, 2023.

18 Camera dei deputati, Studi, 'Interventi per l'editoria', 8 marzo 2022 https://temi.camera.it/leg18/temi/t18_interventi_editoria.html <https://informazioneeditoria.gov.it/it/attivita/misure-di-sostegno-alleditoria/contributi-erogati/>; <https://informazioneeditoria.gov.it/it/notizie/bonus-una-tantum-edicole-2022-fondo-straordinario-per-gli-interventi-di-sostegno-all-editoria/>; Dipartimento per l'informazione e l'editoria, 'L'editoria da...i numeri' <https://www.informazioneeditoria.gov.it/it/approfondimenti-e-normativa/leditoriada-i-numeri/elaborazioni-grafiche/>.

19 <https://www.mimit.gov.it/index.php/it/contributi-emittenti-locali/graduatorie>; <https://www.aeranticorallo.it/dpr-23-8-17-n146-regolamento-concernente-i-criteri-di-riparto-tra-i-soggetti-beneficiari-e-le-procedure-di-erogazione-delle-risorse-del-fondo-per-il-pluralismo-e-innovazione-dellinformazione-in-fav-2/>; R. Carlini, M. Trevisan, E. Brogi, 2023.

20 R. Carlini, M. Trevisan, E. Brogi, 2023.

21 Anonymous sources, online interviews between May and September 2023.

other considerations. Several online platforms allow contributors to offer their work typically earning 3 to 5 euro per piece, although in some specialised sectors content can be rewarded with considerably higher fees. The average compensation for a freelance journalist can be estimated around 20,000 euro per year (while the average wage of a salaried journalist ranges from 19,000 to 32,000 euros per year, depending on the position held²²). Limited resources, increased workloads, and precarious employment situations can all contribute to potential limitations in content quality.²³

The statistics on attacks and threats against journalists can vary depending on the source collecting the data, although all sources agree on a slight increase of attacks in the last five years. The trend of both national and local media is similar. In the case of local media, the proximity between journalists and their potential audience can increase the risk of attacks, and there have been instances of attacks, particularly targeting local TV stations.²⁴

The influence and presence of professional associations can vary depending on the region under consideration. However, the main professional organisation (*Ordine dei Giornalisti*), which oversees their qualifications and ethical standards, has a branch in each Italian Region. Similarly, the primary national-level trade union organisation (*Federazione Nazionale Stampa Italiana*) has various regional associations and unions.²⁵ It is not uncommon for journalists' organisations at the local level to consist predominantly of retired individuals who may be more inclined to prioritise the interests of established members of the profession. This situation can create challenges in terms of adequately representing the diverse needs and concerns of all journalists, especially younger and freelance journalists.

In the case of local branches of national media, there is generally a good adherence to codes of ethics and conduct among local journalists. These branches often follow the ethical standards and guidelines set by their parent organisations, which helps ensure a level of professionalism in their reporting. National media outlets can sometimes be more superficial in reporting local events and stories compared to local media. Local media, being closer to the communities they cover, often have a better understanding of local dynamics and can provide more in-depth coverage of local issues. At the same time, the adherence to codes of ethics and conduct by strictly local and independent local media outlets may be more questionable, as they may not have the same level of institutional support and oversight (high risk).²⁶

As for many other issues regarding journalism, the statistics about SLAPP cases may vary across different sources. Broadly speaking, in recent years, there has been a rise in vexatious lawsuits and legal threats, raising serious concerns since journalists can potentially face up to 6 years in prison and a fine of up to €50,000.²⁷

Editorial independence - Medium risk (56%)

While legislative acts establish rules on the regulation and prevention of political control,²⁸ there are concerns about conflicts of interest and potential political pressure on editorial content for various local media throughout Italy. This situation can pose a risk of conflicts of interest and exert political pressure on editorial

22 M. Carraretto, 'Quanto guadagna un giornalista in Italia?', 26 ottobre 2023 <https://quifinanza.it/lavoro/stipendio-giornalista-italia/239516/>

23 Autorità per le Garanzie nelle Comunicazioni (2021). Sistema dell'informazione: documento conclusivo della prima fase di consultazione pubblica. <https://www.agcom.it/osservatorio-sul-giornalismo-iii-edizione>.

24 FNSI, 'Minacce', 2023 <https://www.fnsi.it/news-minacce>. Ministero dell'Interno, Atti intimidatori nei confronti dei giornalisti, 2023 <https://www.interno.gov.it/it/stampa-e-comunicazione/dati-e-statistiche/atti-intimidatori-nei-confronti-dei-giornalisti>. Council of Europe, 'Platform for the Protection of Journalism and Safety of Journalists (2023), Alerts- Italy', <https://fom.coe.int/en/accueil>.

25 <https://www.fnsi.it/associazioni>; <https://www.odg.it/ordini-regionali>

26 Anonymous sources, online interviews between May and September 2023.

27 F. Martone, 'SLAPP: tattiche diffuse di intimidazione a chi è impegnato nel diritto ad informare', 9 June 2021T <https://www.intersezionale.com/2021/06/09/slapp-tattiche-diffuse-di-intimidazione-a-chi-e-impegnato-nel-diritto-di-informare/#sdfootnote5sym>; P. Rosà, 'SLAPPs in Italy. A limited selection of cases from an ocean of lawsuits', 2021: <https://www.rcmediafreedom.eu/Dossiers/Thematic-factsheet-SLAPP-in-Italy-a-democratic-emergency>.

28 Autorità Garante della Concorrenza e del Mercato (2023), Conflitto di interessi.: <https://www.agcm.it/competenze/conflitto-di-interessi>.

content (high risk).²⁹ Although Corecoms (the regional branches of the national media authority, AgCom) claim to regularly monitor potential conflicts of interest in critical situations, there is no evidence of measures addressing dangerous connections between local politics and media. Available public databases do not clearly disclose ownership structures or actual owners of each media outlet.

In the case of local broadcasting (TV and radio stations), the distribution of subsidies and the requirements to access the contributions raise few concerns, especially in terms of transparency and fairness. In the press industry, the criteria for accessing subsidies can largely be met through the establishment of formal structures (primarily cooperatives), with no qualitative parameter for determining the allocation of contributions. This may lead to discrimination against fair competition: two identical media outlets (in terms of firm size, target audience, and content variety), have unequal resources solely due to their different legal statutes. In addition, some experts argue that there is still a web of interests and political and patronage-based divisions that influence the current distribution of subsidies to local media³⁰. Regarding indirect subsidies (tax benefits, tariff reductions, expense reimbursements, and tax credits), a significant portion of the granted incentives is geared towards traditional print products.

The distribution of state advertising is regulated by law. However, it is unclear what criteria are used to determine the media outlets targeted by advertising investments.³¹ The AgCom has intervened approximately twenty-four times due to alleged non-compliance with those criteria by local administrations. In 13 of these cases, AgCom determined a breach of the law.³²

Local media rely heavily on advertising investments, which can lead to commercial considerations influencing editorial content. For example, the media coverage of "big spenders" may be influenced to avoid negative portrayals. However, for very small media companies, advertisers are also small in scale, and their influence on editorial content is limited. On the other hand, numerous local media outlets, particularly those operating in the online sphere, rely heavily on "clickbait" tactics. This implies that the determination of news values (i.e., newsworthiness) often leans towards sensationalising events and stories for coverage.

While, at the local level, there are few tools to ensure the independence of journalists from political influences and pressures, in the local press industry media outlets demonstrate a commendable resilience. TV and radio stations maintain strong connections with local institutions, regardless of the political majority in power. At the same time, this does not necessarily imply that media companies are subjected to undue political pressure or influence. There are regional initiatives aimed at promoting, among other things, the independence of local information against potential external pressures.

The independence of local branches of AgCom is a matter of concern. This is because the members of the regional branches are appointed by the Regional Council, based on the proposal of the President of the Region. Consequently, the regional political majority holds the power to appoint the members of the local *Corecom* (the committee responsible for monitoring the independence of local information).³³

With regard to RAI, the Italian PSM, the availability of information on the local branches' independence from political influences is limited. RAI falls under the influence of the coalition holding the majority in the Italian Parliament, which often extends its control to the regional branches. In practice, there have been recent cases of questionable appointments in the regional public broadcasting service (high risk).³⁴

29 G. Faggionato, 'Giornalismo e potere, tutti gli intrecci tra stampa locale e interessi privati', *Domani*, 14 February 2022 <https://www.editorialedomani.it/politica/italia/giornalismo-patroni-media-kjz600wf>; L. Mosciatti, 'Tosinvest (Angelucci) vende il 100% del gruppo Corriere a Polimedia', 22 December 2022, <https://www.engage.it/media-industry/tosinvest-angelucci-vende-il-100-di-gruppo-corriere-a-polimedia.aspx>; <https://www.assemblea.emr.it/corecom/il-corecom/comitato/cosa-fa>; A. Mangani, 2022; A. Mangani and B. Pacini, 2022.

30 Anonymous sources, online interviews between May and September 2023.

31 P. L. Santoro, 'Ecco come zampillano i contributi statali ai giornali. Report Data Media Hub', 8 gennaio 2022: <https://www.startmag.it/economia/come-vanno-i-contributi-editoria-giornali/>; Il Post, 'I giornali che ricevono i contributi pubblici (seconda rata del 2021)', 3 February 2023, <https://www.ilpost.it/2023/02/03/finanziamento-pubblico-giornali-2021/>.

32 From the author's review of AGCOM's proceeding: <https://www.agcom.it>

33 <https://www.agcom.it/co.re.com>

34 G. Rossi, 'Rai: al TGR Lombardia promossa la moglie del condirettore', *Il Corriere*, 14 September 2023, https://milano.corriere.it/notizie/cronaca/23_settembre_14/rai-alla-tgr-lombardia-promossa-la-moglie-del-condirettore-giornalisti-in-rivolta-inopportuna-3d9f6d71-f020-405e-903a-a9640f3e4xik.shtml?refresh_ce; L. Di Giuseppe, 'Rai, il M5s vota con la maggioranza sul contratto di servizio, sullo sfondo la partita per la Tgr', *Domani*, 3 October 2023 <https://www.editorialedomani.it/politica/italia/rai-il-m5s-vota-con-la-maggioranza-sul-contratto-di-servizio-sullo-sfondo-la-partita-per-la-tgr-kg6r4ht7>; FNSI, 'Tgr Rai Sardegna, Usigrai e Cdr: «Da capo ufficio stampa Regione a caporedattore, fatto grave»', 19 September 2023: <https://www.fnsi.it/tgr-rai-sardegna-usigrai-e-cdr-da-capo-ufficio-stampa-regione-a-caporedattore-fatto-grave>

There is a lack of available data to measure content diversity at the local level. Since many local media outlets depend heavily on advertising investments and due to high concentration ratios in local media markets, local media often prioritise audience maximisation by minimising content and tone differentiation.

Social inclusiveness - High risk (61%)

The provision of news in minority languages by the public service media (PSM) is asymmetric, with some languages being excluded. RAI is committed to ensuring a television and radio programming offering for the German and Ladin language minorities (in the provinces of Bolzano and Trento), Slovenian language minority (in Friuli-Venezia Giulia), and French language minority (in Valle d'Aosta), while in 2021, agreements were finalised for the protection of the Sardinian and Friulian languages. On the other hand, PSM broadcasting fails in including other minority languages recognised and protected by law (Albanian, Catalan, Greek, and Croatian). Broadly speaking, the general representation of minorities in PSM appears stronger and coherent in regions such as Valle d'Aosta, Friuli-Venezia Giulia, and Trentino-Alto Adige, while in other regions minorities risk being inadequately represented (high risk)³⁵. With regards to the representation of minorities and the related tone and narratives, negative portrayals of Roma and Sinti communities remain widespread.³⁶

There are very limited examples of private news services in non-legally recognised minority languages (Chinese, Romanian and Arabic languages), predominantly in radio broadcasting, but information and data regarding this topic are relatively scarce, and it remains uncertain whether minorities are adequately represented in private media (high risk)³⁷. It appears that attention given to minorities fluctuates depending on other events that capture the interest of media, institutions, and citizens. However, over the past five years, press coverage of immigration has been decreasing, while television outlets have been showing an increase in attention³⁸. The language used to describe these phenomena is however not entirely appropriate. In addition, the phenomenon of migration, once characterised by its exceptional nature, has assumed a sense of normalcy within the media discourse, while still maintaining its central position with new nuances.³⁹

The attention towards other marginalised groups (for example LGBTQ+ communities and persons with disabilities) is generally decreasing in television news. In addition, in TV programmes, these topics are often superficially explored, presented in sensationalist or paternalistic tones, and accompanied by polarised debates (high risk). Streaming platforms and pay channels show better performance. Radio programmes, podcasts, and online content creators demonstrate better representation and exploration of diversity topics.⁴⁰

Apart from minorities, local media, particularly print and online news websites, tend to adequately address the critical information needs of the communities they serve. However, the same cannot be said for local TV and radio stations, which may fall short in providing sufficient information. Some possible reasons for this difference between news formats include resource constraints, audience preferences, journalistic priorities at the local level, and scarce community engagement.⁴¹

35 Aclif, L'offerta radiotv per le minoranze linguistiche, 2021 <https://www.youtube.com/watch?v=4BIOF5gSLWA>. Rai (2022), <https://www.rai.it/trasparenza/Rai-sociale-e-sostenibilita-725819b7-df44-402d-9e7e-2623f1b304e3.html>

36 Council of Europe, 'Resolution CM/ResCMN(2023)4 on the implementation of the Framework Convention for the Protection of National Minorities by Italy', 2023.

37 E. M. Palici di Suni, 'Conclusioni. 'La rappresentanza delle minoranze linguistiche: alcuni spunti problematici'. In La rappresentanza delle minoranze linguistiche (pp. 153-158). Università di Trento, 2023 <https://iris.unito.it/handle/2318/1895233>.

38 Associazione Carta di Roma, 'NOTIZIE DI TRANSITO VIII rapporto Carta di Roma', 2022 https://www.cartadiroma.org/news/in-evidenza/immigrazione-cresce-la-dimensione-dell'accoglienza-cala-l'attenzione-sui-flussi-migratori/?gl=1*ru0bn3*_up*MQ.*_ga*MTQ1MDk0OTY5My4xNjk1MjE2ODA5*_ga_JWT7JLRE91*MTY5NTIxNjgwOC4xLjEuMTY5NTIxNjgwMC4wLjAuMA. A. Pocecco, 'La costruzione dello straniero tra narrazioni medial e rappresentazioni sociali', *Studi di sociologia*, 8 (2), pp. 219-233, 2020. <https://www.torrossa.com/en/resources/an/4661929>. I. Matteucci, 'I frames della migrazione in Italia: rappresentazioni nei media e opinione pubblica', *Sociologia e Ricerca Sociale*, 125 (2), 2021 <https://www.torrossa.com/it/resources/an/5122646>

39 AGCOM, 'Pluralismo politico e sociale in radio', 2023 <https://www.agcom.it/pluralismo-politico-sociale-in-radio>. AGCOM, 'Pluralismo politico e sociale in televisione', <https://www.agcom.it/pluralismo-politico-sociale-in-televisione>.

40 Diversity Lab, 'Diversity Media Report 2023': <https://www.diversitylab.it/>.

41 Diversity Media Report 2023.

In relation to the last point, local media outlets in general show a genuine interest in engaging with the local community. When questioned, some local journalists affirm that the engagement and participation of local residents are evident. However, due to the limited number of journalists working in many of these outlets, it becomes challenging to adequately cover all areas comprehensively.⁴²

Best practices and open public sphere

There are numerous experiences of innovative responses to improve reach and audience, but evaluating their potential is challenging. Some initiatives focused on engaging with the audience through citizen journalism, although these endeavours often require more resources to thrive. Municipalities, on the other hand, tend to utilise social media platforms, such as Twitter accounts, as communication channels to inform the population about various topics, including transportation and public works.⁴³

The most important (and often unique, at the local level) initiatives that tackle the decline of local and community news provision are community media. These initiatives are spread across the entire national territory, including northern, central, and southern areas. Many community media are local radio stations (some examples: *Radio Bullets* in Naples, *Radio Città Fujiko* in Bologna, *Radio Blackout* in Turin; in addition, twenty local radios across the country are affiliated to *Popolare Network*, headed by *Radio Popolare*), because of the long tradition of radio stations in representing the specific characteristics of local areas and communities. Regarding TV stations, only a few attempts have been made to adopt innovative forms of information dissemination to enhance their reach and attract a wider audience. More innovative experiences are digital newspapers (e.g. those under the company *Citynews*, e.g. *Milanotoday*, *Baritoday*...), blogs (e.g., *Napoli Unplugged* in Naples), websites (e.g., *Piemonte Share* in the Piedmont Region), and podcast platforms (e.g., *Spreaker's* podcasts in various locations). These media outlets serve as a means for communities to express their unique perspectives, share local news and information, and engage in public discourse.

42 L. Leone, M. Della Mura, 'L'informazione locale social e il readers engagement'. *Problemi dell'informazione*, 47(2), 199-224, 2022. <https://www.ilpost.it/2021/02/11/giornali-locali-italia>; R. Congiu, 2021; Pascarella: 'Il giornalismo locale è il vero giornalismo, ma dobbiamo ritrovare i giovani', *VareseNews*, 28 October 2022. <https://www.varesenews.it/2022/10/pascarella-giornalismo-locale-vero-giornalismo-dobbiamo-ritrovare-giovani/1513319/>; 'I giornalisti locali? "Costretti ad essere i migliori": Diego Minonzio racconta La Provincia di Como' 26 October 2022 <https://www.varesenews.it/2022/10/giornalisti-locali-costretti-ad-migliori-diego-minonzio-racconta-la-provincia-como/1512197/>.

43 S. Blasi, E. Gobbo, and S. R. Sedita, S. R., 'Smart cities and citizen engagement: Evidence from Twitter data analysis on Italian municipalities', *Journal of Urban Management*, 11 (2), pp. 153-165 <https://www.sciencedirect.com/science/article/pii/S2226585622000206>. A. Perissinotto, 'Raccontare: strategie e tecniche di Storytelling', Laterza, 2022;



Latvia

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Context

In 2022 the Ministry of Culture commissioned a study into the regional and local media landscape in Latvia¹. Data from this report were used to draft the document "Latvian Media Policy Guidelines 2023-2027", which is currently available only to the stakeholders. The report has identified a shortage of local news provision in the capital city Riga and municipalities around it. While the report has been used by media policymakers, it has not triggered any wider debate, either among industry professionals or the public.

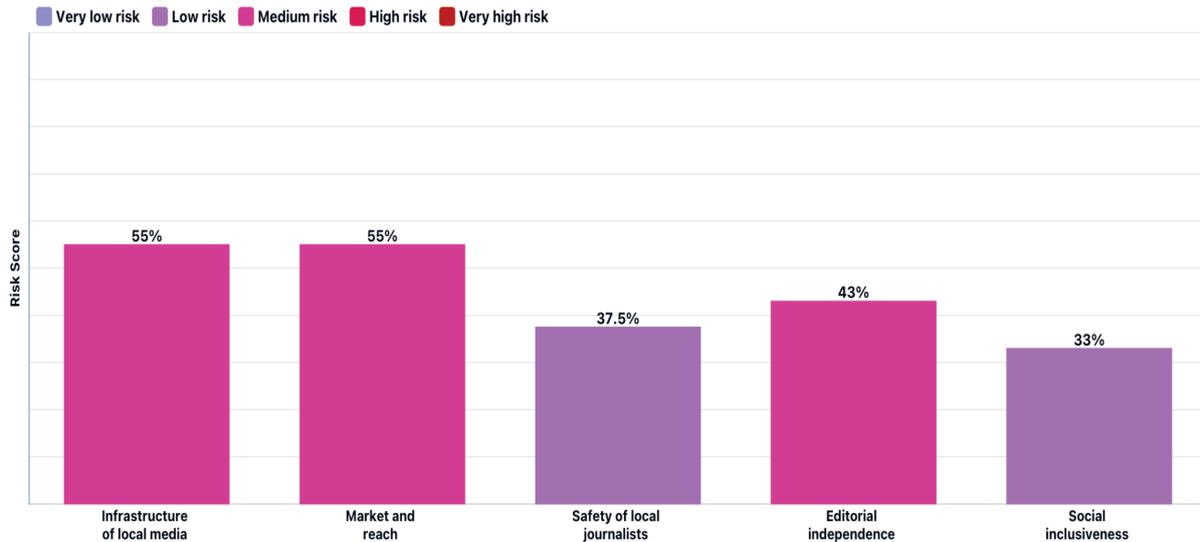
The Electronic Mass Media Law defines “regional electronic mass media” as “those whose broadcasting area of transmission of programmes is not less than 20 percent of the territory of Latvia”, while “local electronic mass media” are defined as “those whose broadcasting area of transmission of programmes is less than the area of transmission of regional electronic mass media”². There is no local or regional press, or community media defined by law in Latvia.

Due to the small and linguistically divided audience (on offer are local media in Latvian, the official language, and local media in Russian, spoken at home by nearly 35% of the population), and the lack of large advertisers, traditionally one to two local media outlets have been operating in the municipalities. There are only a few media groups owning several local / regional media outlets, leading to the assessment that the risk level is low for regional media. While almost all the municipalities have their own local newspaper, there is a limited number of local and regional radios and TV stations, mostly concentrated around the major cities. The readership of local print media continues to drop steadily, and the frequency of publication of local newspapers is in decline.

In the capital city Riga and the municipalities around it there is either none or only one local or regional media outlet present. For this reason, Riga and its surrounding municipalities have been identified in this study as news deserts. These areas are not economically deprived areas, nor do they suffer from low internet penetration.

1 Kantar. Report on the Latvian regional media market and audiences. Ministry of Culture. 2022. <https://www.km.gov.lv/lv/media/30558/download?attachment>

2 Electronic Mass Media Law 2010, <https://likumi.lv/ta/en/en/id/214039-electronic-mass-media-law>



Granularity of infrastructure of local media - Medium risk (55%)

The most common local and regional media outlets in Latvia are news websites and newspapers. Newspapers usually also run their own news sites, and there is a significant number of online-only media outlets. Less common are local and regional radio stations and TV channels. The key player in the audio-visual local and regional media market is free-to-air news and current affairs RE:TV channel. It unites 12 local and regional TV channels. In the second largest city of Daugavpils there are several popular city-based news sites. This makes Daugavpils’ local media ecosystem different from other cities and towns where, as a rule, local and regional media outlets cover both rural and urban areas. While socio-political events related to national institutions in Riga are covered by the national news media, there are no specific media outlets dedicated to news about Riga. Media structure analysis shows that the municipalities around the capital city are underserved by local and regional media.³

Offices of local media outlets are based in towns and cities, but they usually cover the events taking place both there and in the surrounding rural area. According to Ivonna Plaude, Chair of the Latvian Regional Media Association,⁴ the number of local journalists continues to gradually decrease. A shortage of editorial staff, scarcity of funding making it difficult to hire enough employees, ageing newsrooms, trouble attracting young journalists, low salaries, overwork, and burnout are idiosyncratic of the Latvian local and regional media scene.⁵

The public service media, Latvian television and Latvian radio, have only one regional branch and a limited number of regional correspondents, established by Latvian radio. The PSM does not run any local or regional radio stations or TV channels. This is assessed as a high risk situation. The only regional branch of Latvian radio is situated in the Latgale region and is run by Latvian public radio. It started its operations in 2016 and today has its own shows (e.g., current affairs, culture, and arts), as well as providing content for other programmes in Latvian, Russian and the Latgalian regional dialect. Public radio also has news correspondents in two other regions, Vidzeme and Kurzeme. Public television has only one regional news correspondent; she covers the Latgale region. To provide news of other regions, public television commissions content from the local and regional private TV stations. Bordering Russia, the bulk of the Latgale population speak Russian as their family language and are keen users of Russian-origin media content: Latvian media policymakers consider this a threat to social cohesion and national security. As a result, significant investments in the development of a commercial and public media presence in the Latgale region has been made at the expense of other regions.⁶

3 Kantar. Report on the Latvian regional media market and audiences. Ministry of Culture. 2022. <https://www.km.gov.lv/lv/media/30558/download?attachment>

4 Ivonna Plaude, Chair of the Board of Regional Media Association, phone interview, 19. 04. 2023.

5 I. Šulmane and L. Uzule, 'Views of national and regional media journalists', *Diversity of Latvian Media Environment*, V. Zelče (ed.), 117-135. Riga: University of Latvia Press, 2018.

6 Ministry of Culture. Latgale media will receive additional funding to strengthen the information environment. Ministry of Culture. 2023-06-21. <https://www.km.gov.lv/lv/jaunums/latgales-mediji-sanems-papildu-finansejumu-informativas-telpas-stiprinasanai>

There is one news agency in Latvia, LETA, which has correspondents in the major cities in all the regions of Latvia. It does not have correspondents in smaller cities. Yet, as the size of the country is small, if necessary, journalists can quickly get to the scene. At the same time, this means that the news agency can, in the main, cover events in the regions that are of interest to the national audience.

The map you can find at the [following link](#) refers to the local media coverage in Latvia in 2022. The city of Riga was not covered in the original study of the local media market (only the regions outside Riga). However, it should be also pointed out that, de facto, there are no local media present in Riga. The original data source for this visualisation is Kantar, *Pētījums par Latvijas reģionālo mediju tirgu un auditoriju* and you can access it [here](#).

Market and reach - Medium risk (55%)

In general, the existence of the local media market and reach is threatened by several risks related to falling income level, a decrease in the audience due to migration, and negative birth rates. The work of local media is hampered by limited opportunities to invest in digitisation and innovation projects.

The overall readership of local print media outlets is not high, and the number of subscribers is in steady decline. Only 36% of those surveyed in 2022 say they have read local print media over the last month.⁷ The overwhelming majority, 91%, have read printed versions while only 20% have read digital versions. Of those who read printed versions, 30% paid for a particular edition (newsstand sales) and 21% subscribed, while the rest obtained access to the outlet in other ways (via friends, at the workplace, library, school, etc.). Of those who read the digital version, 17% paid for a particular edition and only 5% subscribed, creating a high risk situation. It should be noted that less than half of the local print media outlets provide the opportunity to pay for a digital copy.

According to Ivonna Plaude, the total income of local and regional media has fallen by 20-30% over the past two years (2021-2023)⁸, creating a very high risk, while the turnover has increased as the subscription fees and retail prices have been raised. Due to inflation, the actual salaries of local/regional media employees have decreased.

The production costs of the print press have increased significantly; paper and printing services increased from 17% to 20% over one year. At the same time, the income from advertising decreased by 35%, shown in data collected by the Regional Media Association.⁹ Although digital advertising revenues are growing, income is still very low, and most, 75%, continues to be made from press subscriptions. Advertising revenues constitute 10% of income, creating a high risk situation, and state direct support (grants for quality journalism projects provided by the Media Support Fund) makes up 11%. The income for digital media has slowly increased, but in figures it makes up a very small part of media outlets' revenue. The same can be added about audio-visual media.

State advertising is not defined and regulated in Latvia.¹⁰ Commenting on the issue of state advertising, Ivonna Plaude emphasises that the advertising campaigns created by state institutions, which are distributed by professional media agencies based on commercial rather than social responsibility principles, reach the local media in a very small way. Another big problem for local media is the impact of global platforms on the advertising market. About 80% of the population of Latvia use social networking platforms, so local media with small audiences are not considered serious players in the eyes of national advertisers. A large part of social advertisements related to issues of public interest, such as nature and environmental protection, public health, traffic safety, are placed on social networks.

7 Kantar, pp. 26, 29-31, 2022. <https://www.km.gov.lv/lv/media/30558/download?attachment>

8 Phone interview with Ivonna Plaude, Chair of the Board of Regional Media Association, 2023-04-19.

9 Phone interview with Ivonna Plaude, Chair of the Board of Regional Media Association, 2023-04-19.

10 A. Rožukalne. Country report: Latvia. *Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022*. Florence: European University Institute, 2023. https://cadmus.eui.eu/bitstream/handle/1814/75728/Latvia_results_mpm_2023_cmpf%20%281%29.pdf?sequence=1&isAllowed=y

The situation of local media is affected by the general economic condition of the country, which showed signs of a mild recession in 2023.¹¹ Even more so, the global Covid-19 pandemic negatively affected the income of local and regional media: the number of subscribers fell and the income from newsstand sales dropped. Historically, the development of the local press was negatively affected by informative leaflets issued by local municipalities; for a considerable time these contained journalism-like content and were delivered to all residents of the region free of charge. In all regions, municipal information publications have been used to strengthen the influence of local political power. This has affected the culture of media usage in the regions, as part of the audience gets used to free information, thus undermining the local press,¹² leading to a high risk assessment in this regard for the sake of this study.

Plaude also complained about the poor quality of the postal delivery service. Because of the lack of resources, local newspapers are often delivered late or not at all. This, Plaude thinks, is the main reason for a decrease in the number of subscriptions.

The quality of postal delivery also affects the frequency of publication of local newspapers; only one newspaper continues to publish five times a week, while others have moved to less frequent publication, only two or three times a week.

Two media outlets have closed recently. In 2019 the *Alūksne* and *Maliēna* municipality newspapers merged, while a year later, in 2020, the newspaper *Kursas Laiks* in Liepāja city closed (its news portal *Rekurzeme*, though, continues to operate). This situation has been assessed as medium risk. In December 2023, the newspaper of the Dobele region (in the south of Latvia), *Zemgale*, issued twice a week, announced its closure,¹³ ceasing its subscription campaign, giving an insufficient number of subscribers and the unstable financial situation as reasons for its decision.¹⁴

Since 2017 local and regional media can obtain direct state support for the creation of quality journalism content. This is administered by the Media Support Fund (MSF). MSF has a separate programme dedicated to the support of regional and local media; thus, the risk level is assessed as low. According to an interview with Kristers Plešakovs, Head of the Media Policy Unit at the Ministry of Culture, support for the industry is quite high, accounting for up to 20% of media income.¹⁵ Ivonna Plaude estimated that state support creates between 10 to 20% of local and regional media income. Local media highly value the direct support of the state, while they are aware that it has not always contributed to innovation or higher quality.

Regarding indirect state support, local print media qualify for a reduced VAT (5%) and receive compensation for press delivery. This means that local media pay about 25% of the real press delivery costs, explained Plešakovs.

As for the local media viability, the Media Support Fund programmes provide opportunities for media companies to invest in innovations (formats, technologies, digitalised content etc.). In addition, the Baltic Centre for Media Excellence, a Riga-based NGO working in the field of media training and consultancy, provides support for local media management. Still, the opportunities described here are irregular and the media have to find alternative sources for innovations; thus, the state of funding sources for innovations is assessed as medium risk.

11 Latvijas Banka [Latvian Bank]. Prognozes [Forecasts]. *Latvijas Banka*. 2023-09-29. <https://www.bank.lv/darbibas-jomas/monetaras-politikas-istenosana/prognozes>.

12 Phone interview with Ivonna Plaude, Chair of the Board of Regional Media Association, 2023-04-19.

13 S. Leitāne. 'Pēc 56 gadu darbības laikraksts 'Zemgale' liek punktu' [After 56 years of operation, the newspaper 'Zemgale' ends]. *Delfi/ReTV*. 2023-12-25. <https://www.delfi.lv/55304686/retv-zinas-regionos/56218344/pec-56-gadu-darbibas-laikraksts-zemgale-liek-punktu>

14 Guntars Līcis, executive director of the Association of Press Publishers, face to face interview (2023-12-13).

15 Kristers Plešakovs, Head of Media Policy Unit at Ministry of Culture, face to face interview with (2023-04-19).

Safety of local journalists - Low risk (37,5%)

The safety of Latvian local media journalists is satisfactory, when considering that no physical attacks on journalists have been found. However, in line with the data of the Worlds of Journalism Study (WJS) (2021), local and regional media journalists admit receiving constant online threats.¹⁶ 41% of regional and local media journalists surveyed by WJS admit they have been subjected to humiliating or hateful speech (11% encountered it often or very often); 32% experienced public discreditation of their work (10% often or very often); persecution, 3 % of respondents; 13% have experienced other types of threats or intimidation; 8% have experienced legal actions against them because of their work.

The Regional Media Association and the Latvian Journalists Association are the professional organisations that defend the interests of their members. Not all local and regional journalists and media companies are members of these organisations, still, regional/local media employees are represented on the boards of both organisations mentioned above, they participate in all media related events and discussions protecting their interests in the working groups of Latvia's media policy development.

According to WJS survey data 2021, most local and regional media journalists have temporary job contracts and have access to social security benefits. The average salary of local media professionals is from 700 to 1,100 euros before tax; for about 60% per cent of the local media journalists this is less than the average salary in Latvia in 2021 (1,277 euro), thus the risk for local journalists' working conditions is assessed as medium.

In a 2018 study journalists working for national, local and regional media complained about a significant part of their income being made by royalty (authorship) payments, which in contrast to a salary do not include full social tax payments and means they are less protected in terms of social security.¹⁷

SLAPPs are not monitored and analysed in Latvia. No information has been collected regarding court cases against local journalists.

Editorial independence - Medium risk (43%)

General media regulation protects media freedom and editorial independence, applying also to local/regional media. However, the regulatory framework cannot be considered fully effective, as indirect political control still may appear. More specifically, there are two regions in Latvia in which the local press has been indirectly connected with the influence of local and national politicians for some time: Daugavpils (in the East of Latvia), which is the second largest city in Latvia; Ventspils (in the West of Latvia), where the city's only newspaper has long depended on the political position of the city municipality.

The criteria for direct and indirect state subsidies are clear, and the distribution of this kind of support is evaluated as effective. However, both the definition and the regulation behind state advertising are missing in Latvia, leading to a medium risk assessment. This is accompanied by a lack of data. The issue is actively discussed during meetings of the Ministry of Culture and media organisations on the development of brand-new media policy documents. Still, no decision has been made.

The financial and business environment described above makes local and regional media organisations vulnerable to commercial pressures. In a 2018 study journalists and editors of local media reported cases of major advertisers abandoning further cooperation because the media outlet had published material critical of them. Ivonna Plaude admitted in an interview that the small advertising income means that regional media try to adapt to the needs of commercial clients. There is no regulation, and local media admit sporadic and irregular commercial influence.

16 A. Rožukalne and L. Ozoliņa. 'Complicated shades of contemporary journalism: perception of professional roles of Latvian's journalists'. *The 28th Biennial AABS Conference: Baltic Studies at a Crossroads*. 2022-05-27. <https://aabs-balticstudies.org/aabs-2022-in-seattle/>

17 I. Šulmane and L. Uzule, pp.117-135, 2018.

It can be stated that most of the local media follow professional standards of independence, fairness, impartiality, and accountability. When describing their degree of freedom while doing their work, local/regional media journalists in the WJS survey¹⁸ show a high level of professional freedom. The Latvian Media Ethics Council rarely receives complaints about the ethical misconduct of local media outlets. Since 2018, when the Council was established, of 58 complaints it has reviewed only 6 cases dealing with the local media. Of these 6 cases, the Council ruled that its Code of Ethics had been violated in only 2 cases. Also, among audiences, local media are qualitative and trustworthy sources of information.

However, there are some local media outlets with close ties to the local business/political elites and cannot be considered independent, leading to a medium risk rating. In terms of political influence, ties between media and politicians can be explained through ownership; through financing/sponsoring by politically influential persons; and by treating journalists according to their attitude towards local politicians (e.g., information denied in cases of tricky questions).

When specifically considering the action of the media authority vis-à-vis local media, and the independence of PSM at the local level, the situation appears to be a positive one. In the first case, a low risk is selected due to the independent and neutral decision-making practice of the regulatory body, which is applied to all media organisations, including local/regional media. In the second, PSM has a branch only in the eastern region of Latgale, which is deemed as free from the government or other political interference.

Finally, the content diversity of local/regional media can be assessed as average. Local media suffers from a lack of resources and employees, as Ivonna Plaude and Ingemārs Vekteris attest. As representatives of media organisations Plaude and Līcis relate that the quality/diversity of content is influenced by a lack of resources: small number of employees, high workload, difficulties accessing independent experts in a field, and a conflictual relationship with communication staff members/leaders in some local municipalities.

Social inclusiveness - Low risk (33%)

Of its 1,875,757 inhabitants, 454,350 people living in Latvia are ethnic Russians, followed by Belarusians (57,319), Ukrainians (41,895) and Polish (36,276)¹⁹. 37.7% of the Latvian population report using Russian at home²⁰.

Public and private media provide news in Russian, which is the most common minority language in Latvia. This also includes news on local and regional affairs.

Public radio runs a Russian-language channel, which offers a wide range of content, including news and current affairs. Russian-language newscasts on weekday evenings are available on public television, and the PSM also offers a Russian-language news site. Nevertheless, public media struggles to attract Russian-speaking audiences, i.e., those audiences whose family language is Russian, and PSMs programmes are more popular among the Latvian audiences. Limited content is provided in other minority languages (e.g., Ukrainian, Belarusian, Polish) on PSMs' platforms, which includes news and current affairs, and news on the activities of related NGOs.

However, the kind of representation of minorities, in terms of tone and narratives, is assessed as medium risk. Many studies show that the representatives of ethnic minorities are not sufficiently represented as sources of information in the content of PSMs and other professional media, thus, minority representation practices lead to evaluating the media content as insufficiently diverse and pluralistic.²¹

18 A. Rožukalne and L. Ozoliņa, pp. 11-13, 2022.

19 CSB/LETA. Dažādu tautību iedzīvotāju skaits Latvijā 2022.gada sākumā [Number of inhabitants of various nationalities in Latvia at the beginning of 2022]. LETA. <https://stor1.leta.lv/za-feb3f20/ig/c/8/6/c869ffe0-f097-4bf7-afed-4292e55cb8e0/index.62974f18f33b4.html>

20 Statistics, Latvia, 2017 data.

21 S. Kruk and I. Skulte, 'The Perils of Defense in an Information War: Media, Minorities, and the Threat Next Door', in J. Chakars and I. Ekmanis, 'Information Wars in the Baltic States', Palgrave Macmillan, pp. 187 – 204. 2022. <https://doi.org/10.1007/978-3-030-99987-2>; M. Kaprāns and I. Mierīņa, 'Minority reconsidered: Towards a typology of Latvia's Russophone identity'. *Europe-Asia Studies*, 71(1), pp. 24–47, 2019.

Along with national private Russian-language media, there are also private local Russian-language media operating. This is especially the case in the Latgale region, including local Russian-language radio stations, TV offerings, news sites and print media outlets. Some of the local media outlets are bilingual, with editions in Russian and in Latvian.

Content for and about marginalised groups, such as the LGBTQ community, is offered by national media organisations, including some culture and philosophy-oriented national, niche media outlets aimed specifically at these groups, which reaches local and regional audiences.

Local media usually meet the critical information needs of audiences they serve. However, they often have insufficient financial and human resources to invest in quality, public interest journalism. Local print media outlets offer little news analysis and critical, watchdog type reporting.²² Grants provided by the government-run Media Support Fund partly compensate this shortage.

Local media engage with their audiences in various ways. Ivonna Plaude listed these activities: local media organise on-site discussions on important local social and political issues; participate in the civic activities aimed at the protection of local nature and the environment; provide support for local culture by publishing books and organising events for local authors. Local media usually lack financial resources to commission large-scale audience research. Instead, they get feedback from their audiences in other ways: e.g., in-person communication or phone conversations, audience commentaries on the media outlet's news site and social media accounts.²³ In line with a 2022 survey data, 55% of those surveyed say they trust regional media content.²⁴

Best practices and open public sphere

Only a few local media outlets experiment with innovative ways in content production, delivery, and audience engagement. The most common initiatives include participation in media development projects, offering consultancy with and mentoring by experienced national and international editors. This includes experimenting with their management/editorial procedures. Local media journalists often criticise local media managers of being conservative, resistant to change and, instead, preferring established, routinised ways of management. Young local media journalists, for instance, report resistance on the part of their managers to modernise (e.g., develop a web site, introduce new content) to attract young audiences.²⁵ There have been no citizen or civil society initiatives offering innovative journalism products and services in response to the decline of traditional local media.

22 For further discussion, see I. Šulmane and L. Uzule, 'Views of national and regional media journalists', *Diversity of Latvian Media Environment*, V. Zelče (ed.), 117-135. Riga: University of Latvia Press, 2018; Uzule 2018.

23 Uzule, pp. 156-188, 2018.

24 Kantar, p. 40, 2022.

25 I. Šulmane and L. Uzule, 2018.



Lithuania

Auksė Balčytienė, Vytautas Magnus University

Deimantas Jastramskis, Vilnius University

Context

In Lithuania, the debate about the viability and significance of regional, local and community media is dynamic and has been gradually evolving in the past few years. Likewise, the concept of “news deserts” has found its place in mediated discussions. Groups engaged in public discussions include representatives of minority group associations, regional journalists, experts from professional media organisations (such as the Lithuanian Union of Journalists), academics and researchers, freelancers, experts from different Think-Tanks (Vilnius Political Analysis Institute, Transparency International), policymakers, and representatives from the media regulatory authorities (such as the Radio and TV Support Fund).¹

The main media law “The Provision of Information to the Public”² contains the definition of “regional media”, whereas there are no institutionalised definitions for “community media” and “local media”. In academic studies, “community media” is most often described as media outlets produced by non-profit organisations accountable to the community they seek to serve.

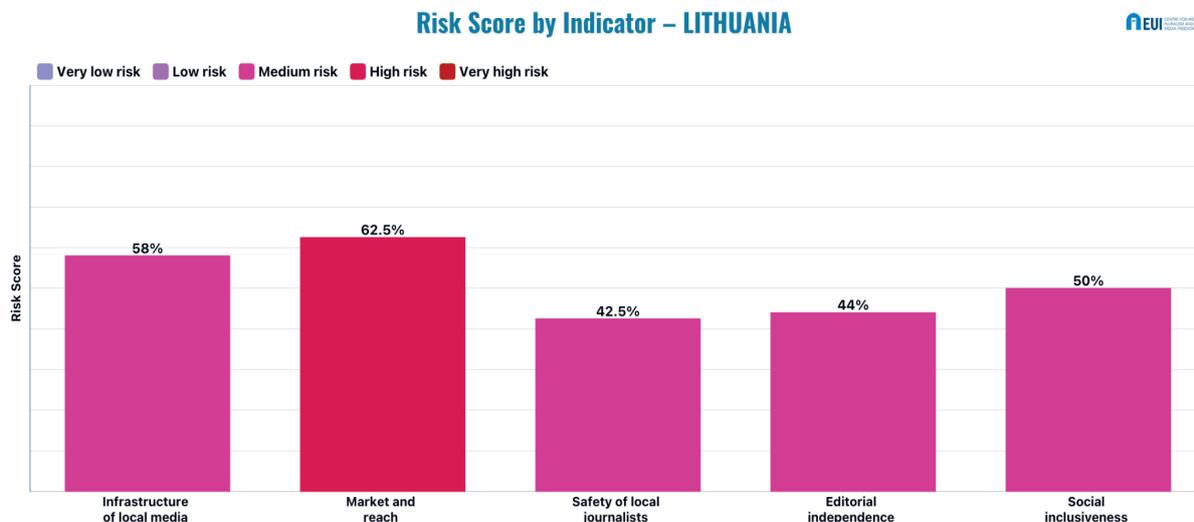
Lithuania consists of two NUTS2 regions: the Capital region and the Central and Western Lithuania region. The GDP per capita of the Capital region was almost twice (43,100 euro) as high as that of the Central and Western Lithuania region (23,200 euro) in 2021. In this analysis, three areas—Druskininkai Municipality, Širvintos District Municipality and Visaginas Municipality—were identified as exhibiting characteristics of “news deserts”. Political-business influence emerges as the most significant factor in determining news deprivation. At the same time, it is not possible to say whether the most economically or technologically deprived areas overlap with those regions identified as “news deserts”. This ambiguity also extends to technological advancements. Lithuania is evenly covered by internet access, which, according to the calculations provided by the Communication Regulation Authority, the RRT (*Ryšių reguliavimo tarnyba*), stands at 99%, with the few exceptions of border regions in Varėna, Ignalina, Šalčininkai, and Pagėgiai.³

1 Atsako žiniasklaidos ekspertai: ar Lietuvos regioninei žiniasklaidai gresia pasaulinė „žinių dykumų“ tendencija? [Media experts respond: is Lithuanian regional media threatened by the global trend of “news deserts”?], 2023, <https://www.delfi.lt/m360/medijos/atsako-ziniasklaidos-ekspertai-ar-lietuvos-regioninei-ziniasklaidai-gresia-pasauline-ziniu-dykumu-tendencija-93293091>; J. Naglienė and B. Sabaliauskaitė, Medijų ir informacinio raštingumo savaitė apnuogino skaudžią tiesą: Lietuvoje didėja žinių dykumos Skaitkite daugiau, 2023, <https://www.delfi.lt/m360/medijos/mediju-ir-informacinio-rastingumo-savaite-apnuogino-skaudzia-tiesa-lietuvoje-dideja-ziniu-dykumos-95002917>.

2 Sections 44 and 45 of Article 2 of the Law on Provision of Information to the Public define regional newspaper and broadcaster: “44. Regional newspaper – a newspaper that is distributed in the territories of the counties of the Republic of Lithuania and whose circulation is not less than 90 percent in the territory of one county; 45. Regional broadcaster – a broadcaster whose programme broadcast by terrestrial television or radio network is received in the territory where less than 60 percent of the population of Lithuania lives”. Legal act, Lietuvos respublikos visuomenės informavimo įstatymo pakeitimo, 2006, <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.280580>.

3 In 2023, three market participants (Telia Lietuva, Tele2 and Bitė Lietuva) were obliged to ensure the provision of universal electronic communication services in these districts. It was shown they covered less than 95 percent of all residential premises in the relevant municipality.

In essence, as revealed on the bar chart below, the risks in the decline of news affecting the local media landscape are more strongly linked to political and business alignments, a diminishing professional independence and infrastructural conditions (media viability and news distribution models), than being directly attributed to purely regional-economic⁴ matters or to those relating to accessibility to digital-technological information.



Granularity of infrastructure of local media - Medium risk (58%)

The critical question of serving the public interest in the local area has become increasingly relevant in the past five to seven years. In all types of public discussions in the media⁵, the objective of regularly serving regional and rural communities,⁶ especially during important times such as political elections, is often framed in the context of “existential questions” for regional media. The questions often revolve around ensuring the financial viability of regional news, maintaining an informed readership, which indirectly also affects journalistic professionalism, and upholding the political independence of the media.⁷ In the regions, subscription is a major guarantor of the financial sustainability of newsrooms, and editorial offices base all their sustainability and marketing activities around it.⁸

There are certain forms of media outlets in suburban areas of towns in Lithuania, among which radio (digital broadcasts) and online media are the most popular platforms. In the Kaunas region, the news portal Kas Vyksta Kaune⁹ is among the best examples of a regional media outlet which covers all suburban areas of the city by including citizen announcements. An example of collaborative partnerships in the development of news exchanges on a regional level is the weekly Etaplus. For over a decade, it has been overseeing the regional news exchange platform www.etaplus.lt, covering news from 60 outlets and drawing in over 60 thousand users per day.

4 Lithuania experienced successful economic growth until early 2022 but has since faced setbacks due to Russian aggression in Ukraine. In 2022, the Lithuanian economy slowed down, and quarterly growth was weak throughout the year, culminating in a negative growth rate of -1.7% in the fourth quarter. In 2022, inflation reached 18.9%, but the rate of price growth was projected to decrease in 2023. In response to inflation, the government has been supporting households and businesses to help them cope with the energy crisis. Infliacijos skaičiuoklė, <https://paslaugos.stat.gov.lt/>; According to the Bank of Lithuania, in 2022, the unemployment rate was 5.9%, which is less than in the previous year (2021 it was 7.2%).

5 Atsako žiniasklaidos ekspertai: ar Lietuvos regioninei žiniasklaidai gresia pasaulinė „žinių dykumų“ tendencija? [Media experts respond: is Lithuanian regional media threatened by the global trend of “news deserts”?], 2023, <https://www.delfi.lt/m360/naujausi-straipsniai/atsako-ziniasklaidos-ekspertai-ar-lietuvos-regioninei-ziniasklaidai-gresia-pasauline-ziniu-dykumu-tendencija-93293091>.

6 J. Naglienė and B. Sabaliauskaitė, Medijų ir informacinio raštingumo savaitė apnuogino skaudžią tiesą: Lietuvoje didėja žinių dykumos. Skaitykite daugiau, 2023, <https://www.delfi.lt/m360/medijos/mediju-ir-informacinio-rastingumo-savaite-apnuogino-skaudzia-tiesa-lietuvoje-dideja-ziniu-dykumos-95002917>.

7 R. Malychas, *Ryšių su skaitytojais konstravimas Lietuvos rajoninių laikraščių redakcijose* [Construction of relations with readers in the editorial offices of Lithuanian regional newspapers] MA Thesis. Vytautas Magnus University: Kaunas, Lithuania, 2022.

8 *Ibid.*

9 News portal Kas Vyksta Kaune official website, <https://kaunas.kasvyksta.lt/>.

It is becoming quite common for information to reach local communities online, since many urban, regional, and local media have restructured their operations to provide online news. However, the critical factor is the audience's ability to access news in such a manner. Lack of sufficient digital skills¹⁰ and the preferences for more conventional types of media among the older population might be one of the major factors preventing further operability of online media in the regions.¹¹

The number of regional media journalists varies across the country.¹² The largest concentration of media professionals is in the capital city where all the dominant news media are based.

As a tradition, regional and local news media aim to have journalists on the spot and many outlets strive to keep their newsrooms functioning, albeit the number of journalists and other professionals is very small.¹³ A further big problem is the age of a journalist; younger journalists are not keen on living in rural areas or localities further away from urban centres. Cooperation on initiatives and projects initiated by teams of journalists based in urban centres is a good possibility for the professional advancement of regional journalists.

Lithuanian National Radio and Television (the LRT, *Lietuvos radijas ir televizija*), the public service broadcaster, has a regional studio in Kaunas with radio and TV journalists and assisting personnel, and a network of correspondents in other bigger cities. This relatively limited arrangement reflects a long-standing tradition, rather than a newer strategy of the LRT, which focuses on maintaining a network of correspondents abroad, such as in Brussels and Washington.

Two news agencies, BNS (Baltic News Service) and ELTA (Ereto Lietuvos naujienų agentūra), operate in Lithuania and both are based in Vilnius. BNS has its correspondents in the second largest city, Kaunas. BNS maintains a platform of news exchanges with regional media. There is a growing need for news agencies to maintain a foundation of accurate information while keeping up with people's news preferences, expanding on news presentation styles and formats. Specifically, news agencies need to restructure themselves and "democratise from within," which means granting more accessibility to audiences and being more sensible to the audiences' needs.¹⁴

Market and reach - High risk (62,5%)

Conventional local media are slowly withdrawing from the market. This can be seen in recent years in the newspaper and audio-visual media sectors. There are only six local television stations in Lithuania, which broadcast news usually only once a day. Local radio stations also operate in less than a third of municipalities. Local newspapers, published in most municipalities, remain the dominant media. Media concentration in local markets is naturally high, as individual markets usually have only a few media outlets.

Most local newspapers are for sale and subscription; the tradition of paid press continues. The newsrooms of local newspapers and new market participants develop local websites. However, the digital press in municipalities is very difficult to commercialise (digital subscription rates in local media are still low), and newspapers remain the main media on the whole.

10 A. Balčytienė, et al. Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report : Lithuania, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, https://cadmus.eui.eu/bitstream/handle/1814/75729/lithuania_results_mpm_2023_cmpf.pdf?sequence=1.

11 R. Malychas, *Ryšų su skaitytojais konstravimas Lietuvos rajoninių laikraščių redakcijose* [Construction of relations with readers in the editorial offices of Lithuanian regional newspapers] MA Thesis, 2022, Vytautas Magnus University: Kaunas, Lithuania.

12 D. Jastramskis, Lithuanian journalism in the vortex of economic risks. The 15th Conference on Baltic Studies in Europe. Turning Points: Values and Conflicting Futures in the Baltics, 2023, Vytautas Magnus University.

13 *Ibid.*

14 V. Bruveris: naujienų agentūros turi plėsti savo stilius ir formatus [The news media must work to diversify their reporting style and format], 2023, <https://www.delfi.lt/projektai/elta-100-ziniasklaidos-veidu-ir-metu/v-bruveris-naujienu-agenturos-turi-plesti-savo-stilius-ir-formatus-93845315>.

The daily reach of local radio stations during the last five years (2018-2022) has been relatively stable.¹⁵ However, the total annual circulation of Lithuanian newspapers (including local outlets) decreased by a third from 2017 to 2021.¹⁶ The number of real users of regional/local websites increased in 2022-2023, and the audience shares of some regional websites also increased in 2019-2022.¹⁷

The revenue of most local media organisations decreased during the COVID-19 pandemic in 2020-2021 and increased in 2022.¹⁸ However, this revenue increase in many cases did not reach the inflation rate.¹⁹ It is possible to state a general decrease in advertising revenue in the local media, with a certain reservation, when evaluating the online-only sector.

The Lithuanian Government partly subsidises the distribution of the periodical press to rural areas. Five percent VAT exemption is applied for the sale and subscription of newspapers, magazines, and the electronic press.²⁰ Direct subsidies to local media are administered by the Press, Radio, and Television Support Foundation (the Media Support Fund since 2024). Although funding from the state budget for this fund in 2022 increased by 0.5 million euro compared to 2021, state support is insufficient to make local media more economically sustainable.²¹

The legislation does not provide universal rules for the advertising of state and municipal institutions in the media. State and municipal institutions, when organising tenders for the purchase of advertising in the media, determine the requirements for advertising in their separate decisions. Moreover, there are no available funding sources for local media outlets that aim to promote innovation.

Safety of local journalists - Medium risk (42,5%)

Most local media journalists work under employment contracts; about 20% are freelancers. The salaries of journalists working in the local media are, on average, lower than the average salary in Lithuania. Thus, the money allocated to social guarantees (especially unemployment benefits and pension insurance) is also lower than the national average. Local media freelancers earn similar incomes to contract journalists, but freelancers receive lower social guarantees.²²

In 2022, some local media organisations have had to reduce staff numbers, and salaries have remained significantly unchanged.²³ However, given approximately 20% inflation in Lithuania, the income (or purchasing power) of many journalists relatively decreased.

There are no registered cases of physical attacks and threats against local media journalists in Lithuania in 2018-2022. However, psychological harassment and online threats or other intimidation are occasional occurrences in the activities of local media journalists.²⁴ In recent years, investigative journalists from national organisations have faced vexatious lawsuits (SLAPPs) but there have been no similar cases in local organisations.

15 Kantar, Metinė media tyrimų apžvalga [Annual review of media research], 2023, <https://www.kantar.lt/lt/top/paslaugos/media-auditoriju-tyrimai/metine-media-tyrimu-apzvalga>.

16 LNB, Lietuvos leidybos statistika, 2023, <https://www.lnb.lt/istekliai/leidiniai/kiti-leidiniai/lietuvos-spaudos-statistika>

17 Gemius Audience, Websites, 2023, <https://e-public.gemius.com/lt/rankings/9791>.

18 Rekvizitai, Duomenų rinkmenos [Data files], 2023, <https://rekvizitai.vz.lt/>.

19 Oficialiosios statistikos portalas, Metinė infliacija [Annual inflation], 2023, <https://osp.stat.gov.lt/pagrindiniai-salies-rodikliai>.

20 Republic of Lithuania Law on the Value Added Tax, 2022, <https://www.e-tar.lt/portal/lt/legalAct/TAR.ED68997709F5/asr>.

21 R. Balčiūnaitė, Medijų rėmimo fondo biudžetu nepatenkinta žiniasklaida prašo institucijų didinti finansavimą [Unsatisfied with the budget of the Media Support Fund, the media ask the authorities to increase funding], Vz.lt, 2023, <https://www.vz.lt/rinkodara/medijos/2023/10/26/mediju-remimo-fondo-biudzetu-nepatenkinta-ziniasklaida-praso-instituciju-didinti-finansavima#ixzz8LgGZXz2G>.

22 D. Jastramskis, Lithuanian journalism in the vortex of economic risks. The 15th Conference on Baltic Studies in Europe. Turning Points: Values and Conflicting Futures in the Baltics, 2023, Vytautas Magnus University.

23 Sodra.lt, Įmonių paieška [Search for companies], 2022, <https://atvira.sodra.lt/imones/paieska/index.html>.

24 R. Juknevičiūtė, D. Donauskaitė and L. Tubys, Žurnalistų darbas interneto amžiaus pradžioje. Iššūkiai saugumui, privatumui, reputacijai [The work of journalists at the beginning of the Internet age. Challenges to security, privacy, reputation], 2020, <https://lzc.lt/wp-content/uploads/2020/09/Zurnalistu-darbas-internete.pdf>.

Some local media journalists are members of professional organisations. The Lithuanian journalists union has its branches in several major cities. However, most journalists do not belong to professional associations. Professional journalistic organisations assist their members in difficult work situations in individual cases, but this does not happen systematically. The activity of professional organisations in ensuring editorial autonomy and professional standards is quite limited. Therefore, journalists do not always trust professional organisations and try to solve the problems on their own.²⁵

Editorial independence - Medium risk (44%)

The indicator editorial independence scores 44% (medium-risk). Lithuanian politicians, civil servants, and spouses have ownership rights to over 100 media outlets.²⁶ Such media ownership is more common in municipalities where a large part of the local media is financially dependent on politicians. As a result, it is quite difficult for some local media organisations to apply journalistic professional standards related to editorial autonomy and impartiality.

The economic weakness of local media organisations and the insufficient state subsidisation efforts mentioned in the market and reach section, pose serious risks to the independence of local media content. At the same time, direct state subsidies to private local media outlets are distributed quite fairly and transparently. However, the distribution of state advertising to media organisations is not always fair and transparent. Unclear schemes for the distribution of state advertising money through communication agencies to the media outlets create conditions for corruption.²⁷

Survey data of Lithuanian journalists show that more than two-thirds of journalists working in the regions (local media) recognise the influence of advertising decisions on their journalistic activities.²⁸ Such dependence of journalistic work in local organisations on political and commercial influences shows that in most cases local media cannot professionally cover all important topics and adequately inform their audience about local political and social problems. The economic weakness of local private media often creates conditions for corrupting editorial offices through municipal advertising services. This way, some political opinions are highlighted, while others are belittled or silenced. In practice, there are cases when journalists of local newsrooms are bound by obligations to local authorities.

Lithuania has three media authorities: the Journalist Ethics Inspector, the Lithuanian Radio and Television Commission and the Public Information Ethics Commission. None of these institutions have local branches. However, they oversee both national and local media. These media authorities act independently.

From 2023, the Lithuanian public media service focuses its news strategy more on the regions and is committed to reflect the current affairs, issues, and opinions of the residents of all regions of Lithuania on LRT channels.²⁹ However, comprehensive information also requires appropriate resources, while a total of eight journalists work in the Lithuanian National Radio and Television branches (in the five largest cities of Lithuania excluding the capital).

It can be summarised that commercial local media experience significant political and economic constraints, often not being able to inform their communities more effectively; the public media service is not always able to fill the emerging information gaps in each region. There is a partial diversity of content.

25 D. Jastramskis, Lithuanian journalism in the vortex of economic risks. The 15th Conference on Baltic Studies in Europe. Turning Points: Values and Conflicting Futures in the Baltics, 2023, Vytautas Magnus University.

26 BNS, Pernai Lietuvoje kas aštunta žiniasklaidos priemonė buvo valdoma politikų [Every eighth media outlet in Lithuania was controlled by politicians last year], 2022, <https://www.vz.lt/rinkodara/medijos/2022/06/23/pernai-lietuvoje-kas-astunta-ziniasklaidos-priemone-buvo-valdoma-politiku>.

27 M. Aušra, LRT tyrimas. Milijonai eurų nuomonei pirkti – kalbama apie šešėlines schemas žiniasklaidoje [LRT investigation. Millions of euros to buy opinions - shady schemes in the media], Lrt.lt, 2019, <https://www.lrt.lt/naujienos/lrt-tyrimai/5/1094176/lrt-tyrimas-milijonai-euru-nuomonei-pirkti-kalbama-apie-seselines-schemas-ziniasklaidoje>.

28 D. Jastramskis, Lithuanian journalism in the vortex of economic risks. The 15th Conference on Baltic Studies in Europe. Turning Points: Values and Conflicting Futures in the Baltics, 2023, Vytautas Magnus University.

29 LRT, LRT 2023-2027 metų strategija [LRT 2023-2027 strategy], 2022, https://apie.lrt.lt/api/uploads/LRT_strategija_2022_horizontal_final_2022_11_23_ikelimui_93fed5d08f.pdf.

Social inclusiveness - Medium risk (50%)

Based on the 2021 general population and housing census, approximately 2 million 810 thousand people lived in Lithuania. Out of this population, 432 thousand representatives of national minorities were identified. This accounts for approximately 15 percent of all Lithuanian residents.

Lithuanian Radio and Television (the LRT) is obliged to provide news in minority languages as part of its programming strategy and mission. The programmes and types of news offered for minority communities on various channels vary based on their specificities: there are original TV programmes produced in Polish, Yiddish, Russian and Ukrainian. As for the internet media, the Lrt.lt website features dedicated pages in Russian, Polish, and English.

The LRT implements the strategy of inclusion, particularly on age groups such as children and seniors, as well as gender (assuring adequate representation of women in news programmes) and addressing minority issues.

The 2020 research data by a monitoring company “Mediaskopas”, indicates that the media’s efforts to change towards more fair representation are evident, but the emphasis on ethnicity, especially in the context of crime reporting, remains a pressing issue.³⁰ Cases of hate speech directed at national minorities tend to increase during important national events, such as parliamentary elections. Again, it is important to acknowledge that this trend is more characteristic of commercial media rather than public service media.

Some of the major commercial news outlets offer news coverage in minority languages. Among these are the internet media (Delfi.lt) which has a dedicated Russian-language newsroom, albeit with a smaller team of journalists. Nevertheless, they cover the main news and provide fact-checks.

The media support system, including the new model of media support, Media Support Fund (Medijų rėmimo fondas), does not identify marginalised people as an audience group with specific needs. Currently, the “Law on Provision of Information to the Public” stipulates that the Media Support Fund allocates support to the projects of registered public information producers and disseminators according to certain programmes and priority areas. Among these are education and culture-related themes, media literacy-related matters, investigative and educational journalism, and other programmes.

In most cases, local media outlets, if they are available in the region, are connected to their audiences and invest efforts to maintain community engagement. It is very often the job of local journalists and media professionals, librarians, teachers, museum workers and religious leaders to serve as core community centres around which local communities gather. Yet, many regional and local media face serious economic sustainability challenges. Therefore, political and business linkages might be problematic. Some critical regions, such as Širvintos and Druskininkai, face limited public scrutiny, while others perform well in terms of media coverage and provision of public interest type of information.

Best practices and open public sphere

Lithuania provides several examples of innovative local community media. One notable case is news portal Kas Vyksta Kaune: with over 10 years history, established as a civic initiative on social media (Facebook) for news exchanges among the people in the city, it has evolved into an online platform with an integrated news portal and social media channel. Over time, it has grown to set and shape the regional news agenda and actively participate in city events. Initially established to bridge news events and citizens in Kaunas, Kas Vyksta Kaune functions as a newsroom with approximately seven professional journalists, editors and IT specialists; additionally, it serves as a hub for internships for journalism, communications, and IT students.

30 National minorities such as Roma, Poles, Russians, and Jews can be found in up to 72 percent of all mentions of hate speech in Lithuanian media. Manoteises.lt, Ištyrė, kas sumažintų neapykantos kalbos srautą tautinių mažumų atžvilgiu, 2021, <https://manoteises.lt/straipsnis/istyre-kas-sumazintu-neapykantos-kalbos-srauta-tautiniu-mazumu-atzilgiu/>.

The Bendra.It project, initiated by the Media4Change organisation, is an innovative venture of “inclusive local journalism”. It provides an engaging hybrid platform which runs both digitally (as a news portal) and face to face meeting sessions for exchanges between citizens and a team of journalism professionals. The team’s task is to further develop ideas offered by citizens into journalistic products.

The third example comes from local suburban media outlets (*Gyvenukaune.lt*, *Gyvenujurbarke.lt*, *Gyvenuplungeje.lt*), initiated and produced by independent journalists directly accountable to their local communities. Traditionally, these media types do not rely on one funding scheme to guarantee their viability; instead, they operate on a project-basis, through crowd-funding initiatives, partnering with other local knowledge organisations (schools, libraries, museums) and using advertising.



Luxembourg

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Context

In Luxembourg, local and national information are intertwined in the media given the small size of the country and the ease of access for journalists, in particular the short distances between places and free public transport. There is no debate about the “deserts of local news” in Luxembourg. Policy makers, industry professionals and the general public don’t recognise that this is a problem and don’t discuss it regularly. The current land area of Luxembourg is 2,574.5 sq. km, with a population size of 640.06 thousand¹. Luxembourg is divided into two regions: Oesling in the north and Guttland in the centre and south. The five largest cities in population size are concentrated in the southern half of the country². In addition, the country's local information also goes beyond borders by devoting itself to news from neighbouring countries as well. This is due to the presence of cross-border workers but also of Luxembourgers who reside in border countries for economic reasons. Local information is thus made up of two local areas: the municipalities and districts of Luxembourg as well as the border territories of the Greater Region (Belgium, France and Germany). Almost half of the resident population is foreign and many of them do not speak Luxembourgish. In January 2022, 47,1% foreigners were living in Luxembourg and the ratio of foreigners is still increasing³.

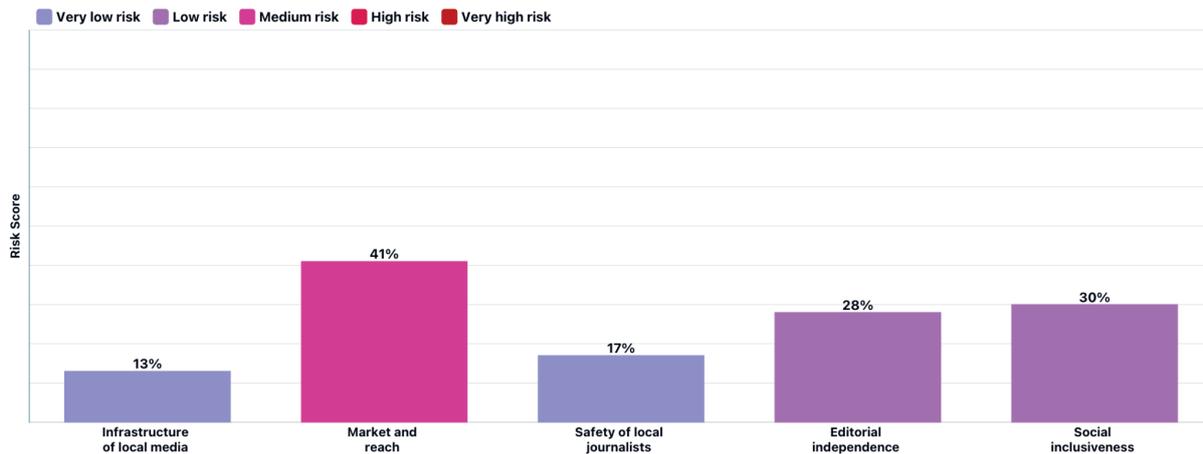
The legal framework of the law of 27 July 1991⁴ on electronic media provides a definition of “local media” in Luxembourg, but this definition only applies to radio. Luxembourg has 19 local audio-visual media according to the Luxembourg Independent Audio-visual Authority (ALIA). Beyond this list, there is no precise name for the written press as local media, except for a local print media named Forum, which is a monthly review founded in 1976 in the legal form of association (foundations and non-profit associations, ASBL). There is no definition in the law for “community media”. But in practice, given the Luxembourg context of multilingualism and multiculturalism with the significant presence of foreign communities within the country, some media can be considered as community media.

1 Land area (sq. km). (n.d.). World Bank Open Data. <https://data.worldbank.org/indicator/AG.LND.TOTL.K2> ; Population, total. (n.d.). World Bank Open Data. <https://data.worldbank.org/indicator/SP.POP.TOTL>

2 Luxembourg with 132 780 inhabitants, Esch-sur-Alzette with 36 625 inhabitants, Differdange with 29 536 inhabitants, Dudelange with 21 953 inhabitants and Petange with 20 563 inhabitants : Population density by municipality on the 1st of January 2023 - Public. (2023). *Statistiques.lu*. <https://statistiques.public.lu/dam-assets/fr/donnees-autres-formats/population-et-emploi/etat-de-la-population/EN-densite-population.pdf>

3 The main foreigner minorities are: The Portuguese 30.8% - The French: 16.1% - The Italian: 7.9% - The Belgian: 6.5% - The German: 4.2% : Nationalités, *Statistiques.lu*, 2023, <https://statistiques.public.lu/fr/recensement/nationalites.html>

4 Legilux. n.d. <https://legilux.public.lu/eli/etat/leg/loi/1991/07/27/n1/consolide/20220821>



Granularity of infrastructure of local media - Very low risk (13%)

The most common form of local media are audio-visual media (radio and television). Communities in rural areas of Luxembourg are well served by local media outlets. Luxembourg's 19 local audio-visual media are divided between 11 in the South of the country⁵ and 8 in the North⁶. This is why the infrastructure of local media represents a very low risk in Luxembourg (13%). In addition, *dok den oppene kanal* is a channel that operated a selection of programmes from local channels, allowing Luxembourgers to have easy access to local news coverage, but which ceased broadcasting on December 31, 2023. These local media are important for the population because, according to the most recent Eurostat data, 32.9% of the population in the country was living in rural areas in 2020⁷. Even if there has been a decline since 2015 (48.5% of the population then lived in rural areas), Luxembourg is still considered one of the most rural countries in Europe. However, the country is nevertheless very well equipped with infrastructure, and rural areas are not, strictly speaking, different from urban areas in terms of services. Concerning newspaper distribution, the country benefits from an offer of 72 kiosks⁸ (Valora group), of which 70% is dedicated to the press, with an expansion of news stands at the rate of two to three stores per year. However, there is an issue regarding mailing by post. The post offices are no longer sending subscribers' weekly newspapers directly, without address labelling, which generated additional costs for the print media. A discussion is underway with the press council and the postal service to try to find a solution.⁹

Given that there is only one PSM radio, 100.7, in Luxembourg and considering the small size of the country, one cannot talk about local/regional correspondents for the PSM, but the geographical distribution of the news is adequate in practice. For example, there are live broadcasts from Diekirch in the North of the country, even if the radio studios are in Luxembourg city. Additionally, taking into account the law of 12 August 2022 on the organisation of the public establishment "Public Service Media 100.7" and amending the law of 27 July 1991 on electronic media, one of the missions of the PSM radio is to provide the entire population of the Grand Duchy of Luxembourg with information on regional and local news.

5 Stengefort TV (channel of the municipality of Steinfort), Pétange Info TV, Esch TV, Dudelange TV, Radio Belle Vallée (Local Radio Bieles cultural association) (Belvaux), Radio Gutt Laun (Schiffange), Radio Diddeleng (Local radio of the City of Dudelange), LRB (Local radio Réiserbann -Betebuerg), Rádio Positiva Luxemburgo (universal reception center a.s.b.l) (Esch-sur-Alzette), Mamer TV, Radio Pétange/Péiteng on Air (Radio-Tele Gemeng Péiteng a.s.b.l).

6 Nordlicht TV (Bettendorf near Vianden and Diekirch), Diekirch TV, Radio ROM (Radioorganisatioun Miedernach a.s.b.l) (Medernach, Ernztal valley), Country Radio Gilsdorf (Country Radio Gilsdorf a.s.b.l), Radio Lora (Association for the creation and operation of radio broadcasts by antenna and cable) (Diekirch), Radio LNW (Radio du Lycée du Nord) (Wiltz), Radio Aktiv (Echternach), Miersch TV.

7 Of the 106 municipalities in Luxembourg, 80 municipalities are classified as in rural areas and occupy 82.2% (2,125.4 km²) of the national territory (2,586.36 km²). Source: "Luxembourg - Rural Development Programme (National)", *Ministère de l'Agriculture, de la Viticulture et de la Protection des Consommateurs*, n.d., <https://www.reterurale.it/downloads/RDP/rdp%20Luxembourg.pdf>

8 L'équipe (F). *Woxx*. n.d., <https://www.woxx.lu/lequipe-f/>; K Kiosk. "Treat Yourself." *Valora Holding AG.*, n.d., <https://www.valora.com/en/brands/kkiosk/>; Le K Kiosk de la Gare Vit SES Derniers Jours. *L'essentiel*. 2023. <https://www.lesentiel.lu/fr/story/le-k-kiosk-de-la-gare-vit-ses-derniers-jours-312058354061>

9 R. Graf, director of the *Woxx*, 8/2/2023, online via Teams.

Market and reach - Medium risk (41%)

The indicator market and reach is scored as a medium risk (41%). The majority of local media are non-profit organisations (ASBL). Given their status, they are not permitted to make a profit and are distinct from commercial companies. Their annual accounts are filed with the Register of Businesses and companies (RCS) and not published. It is therefore noted a lack of transparency regarding local media revenues. Furthermore, the only data concerning advertising revenue published by *adada.lu* in the Adreport is limited to national media¹⁰.

The financial support provided by the government at national, regional, local or municipal level to local media is existing but not sufficiently transparent and anchored in a long time frame. Yet, the local media largely contribute to maintaining pluralism in the Luxembourg media landscape. Funding through advertising is limited and only non-profit associations can obtain permission to open a local radio outlet (art.17 Law on Electronic Media of 1991). As an example, NORDLICHT TV is financed mainly by sponsorship, by advertising and by the support of the majority of the municipalities in the north of the country, as well as by the Ministry of State, Media and Communication department. Subsidies are regularly granted by the municipalities for this purpose (Bourscheid in 2019¹¹, Reisdorf, for the amount of 700 euros in 2018¹²). Several agreements have been signed, including an agreement in 2019 with the College of Echevinat and in 2018 with the municipality of Mertzig¹³. As for Radio ARA, an agreement has been reached with the state for the period 2021-2025, securing funding of one million and 200,000 euros spread over 5 years. Advertising revenue is in fact described as “limited” by the status of a non-profit association. Local audio-visual media do not benefit from the aid programme of the law of 30 July 2021, which concerns the printed and online written press. Audio-visual media are in fact excluded because they are considered broadcast programmes and are covered by the amended Law of 27 July 1991 on Electronic Media (Article 2, Point 24¹⁴). They therefore benefit from assistance on a case-by-case basis.

Luxembourgers have access to local news in the daily press media. Indeed, local news intertwines with national news. Among the 3 most widely read daily press newspapers (print and online version included), two newspapers have a fee: the *Luxemburger Wort* and the *Tageblatt*¹⁵. Although two paid newspapers are in the top 3 most read press in terms of local news, the free newspaper *L'Essentiel* ranks second in terms of readership. The majority of readers are not used to paying for local media, either for the audio-visual sector (local audio-visual media are free) or for the press sector. In addition, in 2019, the discontinuation of the weekly publication *Le Jeudi*, founded in 1997, reveals that the subscription and advertising-financed model is no longer viable since the digital transition. According to *Editpress* management, the advertising market has largely shifted from the print to the digital market and the revenue generated by voter subscriptions has not been able to compensate for the advertising deficit.

10 Adada, "Luxembourg ad'report 2022: Investissements publicitaires en Hausse de 4,3 millions par rapport à 2021, *adada*. 2023. <https://www.adada.lu/2023/03/luxembourg-adreport-2022-les-investissements-publicitaires-progressent-de-43-millions-par-rapport-a-2021/> .

11 Séance du conseil communal du 25 octobre 2019, <https://bourscheid.lu/wp-content/uploads/2020/10/Aide-memoire-2019.10.25.pdf> .

12 Conseil Communal Reisdorf - Séance publique du 22 mars 2018, <https://reisdorf.lu/wp-content/uploads/2021/07/Seance-du-conseil-communal-du-22-mars-2018.pdf>.

13 Administration Communale - SÉANCE DU CONSEIL COMMUNAL (Mertzig, 20 April 2018), <https://www.mertzig.lu/wp-content/uploads/2020/04/convocation-1.pdf>.

14 Law of 27 July 1991 on Electronic Media, art. 2, pt. 24: "a) any program, in particular broadcast radio, television or teletext, which is transmitted using a Luxembourg broadcasting frequency, as defined in paragraph (1), even if such a program occupies only part of the bandwidth of this frequency or only part of the available airtime, or if it uses other means of transmission in parallel; any program, in particular broadcast radio, television and teletext, which, without being transmitted using a Luxembourg broadcasting frequency, requests and obtains a concession in accordance with Article 9, paragraphs (1) and (3), by agreeing to submit to the provisions of this chapter".

15 The *Luxemburger Wort* (print and online) ranks first with 130,500 readers (i.e., 24.5% of the population), *L'essentiel* or e-paper *L'essentiel* is 2nd with 95,700 readers (i.e., 17.9% of the population), in 3rd position is the *Tageblatt* or e-paper *Tageblatt* with 32,300 readers (i.e., 6.1% of the population) and in 4th position *Le Quotidien* or e-paper *Le Quotidien* attracts 14,800 readers (i.e., 2.8% of the population). Source: TNS ILRES, "Communiqué de presse : Etude TNS ILRES PLURIMEDIA LUXEMBOURG 2022.I ", 2022, https://ilres.com/media/1824/communiqu_e_de_presse_etudeplurimedia_2022i.pdf (accessed 9 February 2024).

Generally, there has been a maintenance of the local media landscape over the past five years. For example, since 1992, Radio ARA has been broadcasting on the Luxembourg airwaves, despite a drop in audience for the local radio station Radio ARA in 2022. According to the Plurimedia study by the ILRES polling institute in 2021 for the first period of the study, Radio ARA lost audience numbers in 2021¹⁶. Conversely, the local media Nordlicht TV gained in numbers¹⁷. In 2022, the audience for this local media increased¹⁸.

Concerning the print press and online press, there has been an increase in the amount of financial support provided by the state to local media outlets in recent years, thus there is a very low risk reported for this variable. To maintain and support media pluralism, the government passed the law of 30 July 2021 on an aid scheme for professional journalism by granting 200,000 euro per media with the condition of hiring 5 journalists on permanent contracts. This allows for the maintenance and development of the press. Each year, the media must meet the conditions required to obtain aid, which is why the amounts over the years are not guaranteed and may vary¹⁹. For example, *contacto.lu*, which is a community media for the Portuguese community in Luxembourg, received 219,286.55 euro in 2021 compared to 387,082.93 euro in 2022 with the new press aid regime. The Mediahuis Luxembourg group was also able to develop *Virgule.lu*, a French-language information site for Luxembourg residents and inhabitants of the Greater Region. Even if it is not strictly speaking local media, due to its private for-profit economic model, the target audience is a well-defined local audience and responds to the particular nature of Luxembourg in terms of demand for local information.

For the market and reach area, which has the highest score, the most problematic issues are the lack of data and transparency. Even if local radio stations are limited in terms of advertising, public data on these potential earnings and access to the precise ownership of local media is not available. For example, when accessing the RCS (trade and companies register), there is only access to the name of the company, its registered office, the legal form, the NACE code and the date of registration. Data on the weekly audience of local media is unavailable. The only data obtained concerns a period of 5 months with the Plurimedia study by the polling institute ILRES. Moreover, Luxembourg is not analysed in the Digital News Report by the Reuters Institute.

Safety of local journalists - Very low risk (17%)

The conditions of employment of journalists in the media are quite good, in particular the stability of employment (hiring of journalists on permanent contracts). The new press aid regime also promotes this stability since the hiring of journalists on permanent contracts is one of the conditions for obtaining aid. To be a freelancer is a choice. Nevertheless, it should be noted that remuneration is quite low in comparison with the average income of Luxembourgers.

The only available list of journalists from the Press Council²⁰ does not mention either the evolution of the number of local journalists over five years, or their location. This lack of data constitutes a low risk for transparency for monitoring the conditions of journalists and journalism.

16 7,700 listeners listened to the radio (i.e., 1.7% of the Luxembourg population) compared to 4,900 listeners in 2022 (i.e., 0.9% of the population). Source: TNS ILRES, "Communiqué de presse : Etude TNS ILRES PLURIMEDIA LUXEMBOURG 2022.I", 2022, https://ilres.com/media/1824/communiquede_presse_etudeplurimedia_2022i.pdf; Ilres, "ILRES - Etude TNS ILRES PLURIMEDIA LUXEMBOURG 2021.I." *Ilres*, 2021, <https://ilres.com/news/ilres/2021/etude-tns-ilres-plurimedia-luxembourg-2021i/>

17 In 2021, 8,700 viewers (i.e., 1.7% of the Luxembourg population) followed the local channel in the north of the country. Source: Source: TNS ILRES, "Communiqué de presse : Etude TNS ILRES PLURIMEDIA LUXEMBOURG 2022.I", 2022, https://ilres.com/media/1824/communiquede_presse_etudeplurimedia_2022i.pdf; Ilres, "ILRES - Etude TNS ILRES PLURIMEDIA LUXEMBOURG 2021.I." *Ilres*, 2021, <https://ilres.com/news/ilres/2021/etude-tns-ilres-plurimedia-luxembourg-2021i/> (accessed 9 February 2024).

18 With 13,100 viewers, or 2.5% of the population. Source: TNS ILRES, "Communiqué de presse : Etude TNS ILRES PLURIMEDIA LUXEMBOURG 2022.I", 2022, https://ilres.com/media/1824/communiquede_presse_etudeplurimedia_2022i.pdf; Ilres, "ILRES - Etude TNS ILRES PLURIMEDIA LUXEMBOURG 2022.I." *Ilres*, 2022, <https://ilres.com/news/ilres/2022/etude-tns-ilres-plurimedia-luxembourg-2022i/>

19 *Data.public.lu*, 2022, <https://data.public.lu/fr/datasets/r/0116f309-36f4-40a7-bbdf-ee42180bb6cb>

20 *Press.lu*, "Liste des journalistes officiellement reconnus au grand-duché de Luxembourg". *Conseil de presse - press.lu.*, n.d., <https://www.press.lu/journalistes/liste-des-journalistes/>

The Association of Professional Journalists (ALJP) is present at the local level and is effective in guaranteeing editorial independence and/or respect for professional standards for local journalists. Local journalists and newsrooms are committed to ethical journalism principles and adhere to specific codes of ethics or conduct. According to interviews conducted for this research, local journalists respect the ethics and deontology of journalism in the same way as national journalists. The journalists interviewed²¹ working for local and community media make it a point of honour to respect professional journalistic standards because of the greater concern of the public and the importance of maintaining a closeness and a link of trust with their audiences.

However, there were 3 cases of threats to the physical safety of three journalists in Luxembourg. However, these three journalists work at the national newspaper *Tageblatt*, the investigative online platform Reporter.lu and radio 100.7, so they do not work for local media. Regarding the legal framework, Luxembourg is perhaps looking towards drawing inspiration from France²². Currently, it does not have a specific legal framework concerning the prosecution of threats against journalists²³, and the ordinary Criminal Code applies. According to the data obtained, there have been no cases of SLAPP involving local journalists. Only the national newspaper *Tageblatt* had received letters from a lawyer requesting a right of reply as well as demands for compensation amounting to 150,000 euro. Currently, Luxembourg does not have a specific legal framework concerning SLAPPs.

Editorial independence - Low risk (28%)

Political control of local media by ruling parties (local or national), partisan groups or politicians is unregulated, but effectively prevented in practice.

State subsidies (direct and indirect) are not distributed to private local media equally and transparently. They are made on a case-by-case basis and, in addition to not being distributed in the same way, the amount is also not transparently disclosed for all local media. For example, the precise total amount received by Nordlicht TV is not known. Admittedly, it is possible to observe that a certain number of subsidies are regularly granted by the municipalities.

No data on the distribution of state advertising to private local media is available, raising a medium-risk level in terms of transparency.

By looking at the extent of commercial influence over editorial content, it can be stated that this happens rarely. According to the legal framework of article 17 of the law of 27 July 1991 (amended and applicable on 21 August 2022) on electronic media, local radio services do not have the right to have a profit motive and must limit advertising messages. Local audio-visual media content is monitored by ALIA to check commercial influence. Journalists interviewed have confirmed that the content is clearly separated from marketing advertising and other commercial activities²⁴. The present research has observed a single decision DEC011/2023-P028/2023 of 9 October 2023 of the Board of Directors of the Luxembourg Independent Audio-visual Authority concerning a complaint against the .dok service regarding the dissemination of communication commercials in the 21 February 2023 broadcast of Dikrich TV.

According to the law of 27 August 2013 creating the public establishment "Luxembourg Authority audio-visual independent", the local media is independent from political influences. Local audio-visual media content is also monitored by ALIA to check political influence. However, despite this legislation and the self-regulation in place, some cases do occur, as demonstrated by a case of political pressure in the coverage of the news of a municipal council, which emerged thanks to the interviews conducted for the scope of this research²⁵.

21 Melody Hansen, editor-in-chief of *Letzebuurger Journal*, 21/06/2023, online via Teams. Franziska Peschel, journalist of *Radio Ara*, 22/06/2023, online via Teams.

22 Schnuer, C. "Une protection des journalistes d'inspiration française". *Paperjam News*. 2022, <https://paperjam.lu/article/protection-journalistes-inspir>

23 Sam Tanson a participé à la Réunion du Conseil 'Justice et Affaires intérieures' De l'union européenne à Bruxelles. *gouvernement.lu // Le gouvernement luxembourgeois*. 2022, https://gouvernement.lu/fr/actualites/toutes_actualites/communiqués/2022/12-decembre/09-tanson-jai.html

24 Melody Hansen, editor-in-chief of *Letzebuurger Journal*, 21/06/2023, online via Teams. Franziska Peschel, journalist of *Radio Ara*, 22/06/2023, online via Teams.

25 Melody Hansen, editor-in-chief of *Letzebuurger Journal*, 21/06/2023, online via Teams. Franziska Peschel, journalist of *Radio Ara*, 22/06/2023, online via Teams.

The Luxembourg Independent Audiovisual Authority (ALIA) has a remit over 19 local audiovisual media. ALIA's missions include the *a posteriori* monitoring of the contents of local audio-visual media. Strictly speaking, its mission is not to guarantee a safer environment for local media; this is more the responsibility of the Media and Communications Service according to the regulation of 14 September 2022 establishing the organisation of the Media and Communications Service. No cases of concern regarding the authority's independence were detected.

Radio 100.7, the only PSM radio in Luxembourg, is independent from the government or any other form of political influence in practice. Concerning the private media RTL, which also has public service missions, respect for autonomy and editorial independence are guaranteed by the supervision of the independent Luxembourg audio-visual authority ALIA, which receives complaints.

It can be stated that local media provide a diverse scope of stories, viewpoints and tone of reporting, although sometimes the respect for contradiction specific to professional journalism is not always respected (ALIA 2023²⁶).

Social inclusiveness - Low risk (30%)

Concerning social inclusiveness, the level of this indicator is at low risk (30%). In Luxembourg, the three official languages are Luxembourgish, French and German. Beyond these three official languages, there are many minority languages. The communities that do not understand Luxembourgish or that do not use it as their main language of communication constitute the biggest type of minority in Luxembourg²⁷. Luxembourg presents a very paradoxical situation in which the sum of its linguistic minority groups will soon become the "majority". Private media outlets and services (TV, radio, press, online) are offering news services in minority languages. PSM does not have national news available in minority languages. The only PSM, Radio 100.7, has a programme of national news essentially in Luxembourgish, thereby excluding half of the country's population. To offer its public service to a larger part of the population, the director of 100,7 wanted to create a French-speaking programme. The discussion is still ongoing between the director of 100.7 and the president of its board of governance, and ALIA and the government of Luxembourg.

It should be noted that this absence of airtime for linguistic minorities in PSM is partly compensated by the services offered by RTL television and the RTL website, within the framework of their public service missions. Indeed, RTL television offers a daily information programme in Luxembourgish with French subtitles and a short information programme (around 2-3 minutes) in French. In addition, a lot of effort has been made over the last few years to develop a digital product offering in French and English (RTL Infos & RTL Today). According to the director of RTL Luxembourg, these platforms are now within the scope of the public service agreement that came into effect on 1 January 2021. In this dynamic, RTL Today Radio, was transmitted in March 2022 to address the general public in English via the web. Chronicle.lu offers an online information service targeted towards the international community across Luxembourg and the Greater Region, and specifically at those who use English as a first or second language in their social and/or working lives. *Luxembourg Times* and *Delano* also offer news in English. For the French community, there are a lot of offers such as *L'essentiel* (free newspaper and radio), *Le Quotidien*, *Virgule.lu* (French speaking media from Luxemburger Wort), *Les frontaliers & residents*, *Paperjam*, *Woxx* (some articles are also written in French). For the Portuguese community, there is also a media outlet offer, such as *Contacto* and *Radio Latina* (Mediahuis group).

According to the interviewees and observations, the main Luxembourg media cover news about marginalised groups when there is news about them. However, they find that this should be considered more as the norm and no longer as something marginal.

26 L'Autorité luxembourgeoise indépendante de l'audiovisuel (ALIA), "Rapport sur la campagne électorale médiatique pour les élections communales du 11 Juin 2023", https://alia.public.lu/wp-content/uploads/2023/10/ALIA_Rapport_Campagne-electorale-Communes-2023.pdf.

27 La Diversité Linguistique. *Statistiques*. 2023, <https://statistiques.public.lu/fr/recensement/diversite-linguistique.html>

Since their audience is made up of a small, well-defined community, local media should meet the critical information needs of the communities that they target. Local journalists interviewed are aware of the importance of maintaining a closeness and a link of trust with their audiences²⁸. Plurimedia study shows that local media have a small audience (Radio ARA, 0,9%; Nordlicht TV, 2,5%; Uelzecht Kanal, 1.2%; .dok, 1,1%, see Plurimedia 2022.I). Local media therefore need to connect more with the public to maintain and perhaps increase their audience.

Best practices and open public sphere

In Luxembourg, there are indeed media organisations that are experimenting with innovative responses to improve audience involvement. This is the case of *Forum* magazine, which describes itself as an open and participatory media. *Forum*²⁹ regularly invites civil society to participate in debates on social issues. The local radio station Radio ARA participates in events like the Migrations Festival and International Bazar³⁰. Within these events, local radio is present to perform on live shows in order to get closer to people, get them involved and make the radio known to increase their reach. Regarding innovative journalistic formats, the implementation of podcasts and videos on demand is increasingly common in local media. According to our interviews, local media are connected to their community and in most cases, they interact with their audience³¹. Indeed, either individuals contact them directly to inform them of a subject to be treated or they go to the field in search of subjects that may interest their audiences. Social networks are also invested in uniting audiences, in particular through the creation of content specifically dedicated to social networks. For example, the *Lëtzebuenger* journal has started creating Tik-Tok content to be closer to young audiences.

28 Melody Hansen, editor-in-chief of *Lëtzebuenger Journal*, 21/06/2023, online via Teams. Franziska Peschel, journalist of Radio Ara, 22/06/2023, online via Teams.

29 Forum.lu. (n.d.). <https://www.forum.lu/fr/le-magazine-forum/objectif/>

30 Bazar International di Luxembourg, n.d., <https://www.bazar-international.lu/> ; Festival des migrations, des cultures et de la citoyenneté, *ARA City Radio*, 2023, <https://aracityradio.com/features-blog/2023/2/16/festival-des-migrations-des-cultures-et-de-la-citoyennete>.

31 Melody Hansen, editor-in-chief of *Lëtzebuenger Journal*, 21/06/2023, online via Teams. Franziska Peschel, journalist of Radio Ara, 22/06/2023, online via Teams.

Malta

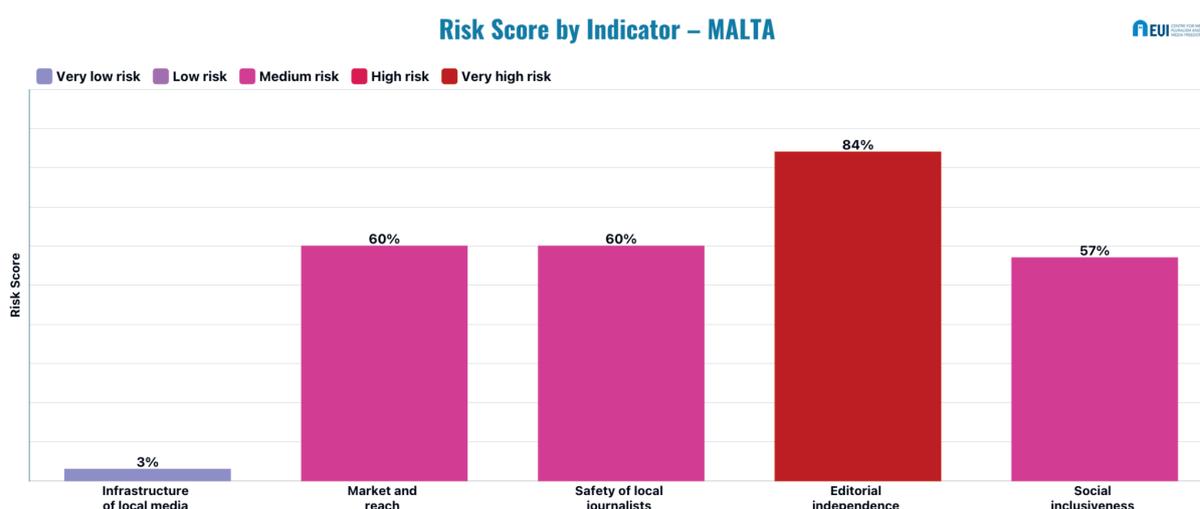
Louiselle Vassallo, Department of Media and Communications, Faculty of Media and Knowledge Sciences, University of Malta

Context

Malta is a Mediterranean island state and one of the smallest archipelagos in the world, with a total land area of 320 square kilometres¹ and a population of 531,113.² Only the 3 largest islands (Malta, Gozo and Comino) are inhabited, and It is the most densely populated EU member state, with an estimated 1,620 persons per square kilometre.³

In view of its geographical size and an oversaturated media landscape, there is no debate on local "news deserts" in Malta. It is a given that what are considered to be national media outlets are also local, since all the territory is reached by the news media. Additionally, what is "local" becomes national, since newsworthy content across the territory is covered on a national level by the leading news outlets for all media formats (press, TV, radio, online). Community radio stations are normally village or town based and serve to cover cultural aspects like religious village feasts or specific locality based events.

The most serious issue, as highlighted by the graph below, is the lack of editorial independence of a number of media outlets in Malta: the two main political parties in Malta own and operate multimedia outlets. In contrast, the variable granularity of the infrastructure of local media carries a very low risk, since the national media, as mentioned above, fulfil the obligations that, in a larger country, would be addressed by local or community media outlets.



1 World Bank Data, Surface Area (sq. km.) Malta, 2021, <https://data.worldbank.org/indicator/AG.SRF.TOTL.K2?locations=MT>.

2 World Bank Data, Malta Overview, 2022, <https://data.worldbank.org/country/malta?view=chart>.

3 World Bank Data, Population density (people per sq. km of land area) – Malta, 2021, <https://data.worldbank.org/indicator/EN.POP.DNST?locations=MT>.

Granularity of the infrastructure of local media - Very low risk (3%)

In Malta, local media are not defined in law, and there has been no development of "local media" as a concept, since the whole country is covered by national outlets, through all media formats. For the purposes of this research, the national media are to be understood as "local" as well, since they are one and the same in view of Malta's geographical size. There is, thus, no distinction made between local and national media in Malta. There are no "local" editions of the national media, and whilst Malta has a few community radio stations, regional media does not feature in the Maltese media landscape. This is also in view of the fact that all the territory is easily accessible to the news media, and the "local" is what makes up "national" news, and is covered by all leading outlets, including PSM:⁴ TVM, TVMNews+, TVMSports+, Radju Malta 1 and 2 and Magic Malta, all operated by Public Broadcasting Services (PBS)⁵ Limited, which is owned by the Government of Malta.

All media are available over the entire territory and communities in suburban areas in Malta are well served by the national media (TV, radio, print and online). Essentially, data pertaining to consumption on a national level apply, as confirmed by the Malta Communications Authority Annual Report, 2022, which states that 94% of the respondents expressed satisfaction with their experience when using internet and TV services.⁶ Additionally, with the advent of digital radio (DAB), previously problematic pockets of reception, where the radio signal was unavailable or of inadequate quality, have been reached, including all the islands of the Maltese archipelago.

Community media, on the other hand, are defined only as pertaining to radio: the "community radio service" is designed to cater for the needs of a particular community or locality and has a limited range of reception.⁷ These radio stations are normally village or town based and serve to cover cultural aspects like village religious feasts or specific locality based events. There are currently 20 community radio stations listed on the Broadcasting Authority's website, the majority of which are run by religious (Catholic) organisations. In the online sphere, the African Media Association Malta is an online community radio, web magazine, which also publishes video clips and podcasts. There are no community TV stations or print media publications, except ad hoc publications issued by local councils, or organisations like parish councils.

Market and reach - Medium risk (60%)

Anecdotally, most media outlets (national) report that they are struggling economically, however there is no data to refer to since financial information pertaining to media outlets, including revenue data, is not publicly available. The fact that there are no publicly available figures to compare, and that the financial stability of the media sector has not been monitored over a period of time, should be considered high risk, since there is no way of determining the level at which assistance is required and, thus, no policy is being designed to assist media outlets that need support. The only platforms that disclose their financial situation are The Shift News—which does not accept government funding; accepts direct advertising from reputable business entities; and also relies on crowdfunding and NGO grants—and blogger Manuel Delia, who has no affiliation to any organisation and no corporate or public funding, and operates by accepting donations and offering subscriptions.

The Broadcasting Authority, the Malta Communication Authority and the Malta Competition and Consumer Affairs Authority do not publish economic data for the media sector, and company accounts are not available publicly. The only source that may be referenced is WARC data, which show that, when it comes to radio revenue, there has been an increase from 3 million euro in 2021 to 3.2 million euro in 2022 in radio advertising expenditure; when taken into the context of GDP growth vis-à-vis the inflation rate, this was

4 TVMNews,Landing page, <https://tvmnews.mt/>

5 Registry of Companies, Public Broadcasting Services Limited - Involved Parties, 2024, <https://registry.mbr.mt/ROC/index.jsp#/ROC/companyDetailsRO.do?action=involvementList&companyId=C%2013140>.

6 Malta Communications Authority, Annual Report and Financial Statements 2022, 2023, [https://www.mca.org.mt/sites/default/files/MCA Annual Report 2022.pdf](https://www.mca.org.mt/sites/default/files/MCA%20Annual%20Report%202022.pdf).

7 Broadcasting Act, 2020, <https://legislation.mt/eli/cap/350/eng/pdf>.

evaluated as stationary.⁸ Furthermore, according to Statista⁹, the revenue for the digital market in Malta in the coming years "is expected to soar." However, unless financial data pertaining to the entire media market, as well as broken down according to separate media formats, are made public, there are no numbers or trends on which policy and potential assistance can be based.

Currently, there is no scheme that provides financial support to community media. These operate through volunteers and have an extremely limited reach, generally covering the territory of the village concerned.

If one rules out PSM, which are funded by the state, it is safe to say that the government does not provide enough financial support for media outlets, as there are no regular economic schemes designed to strengthen the media industry, bar a couple of initiatives: in view of the substantial increase in the price of paper and following lobbying by some news outlets a one-off, ad hoc grant¹⁰ of €500,000 was launched in 2022 and distributed amongst local print media; and a 2023 Arts Council Newspapers Support Scheme¹¹, totalling €400,000, aimed at promoting good use of the Maltese language and Maltese culture in newspapers. Only Maltese language newspapers are eligible. One cannot fail to note that 4 of the beneficiaries of the latter (2 dailies and 2 weeklies) are owned by the two main political parties (*Partit Laburista* (PL), in government, and the *Partit Nazzjonalista* (PN), in opposition), whilst the editorial line of the 3 remaining Maltese language newspapers is openly sympathetic towards the PL. Essentially, this scheme excludes all the independent print media, who publish in English. No similar funds have been announced for digital media or other modern variants in journalism.

During the Covid-19 pandemic, the government was also criticised for not distributing funds equally, with reports that political party media got the lion's share of the financial assistance offered. It was also not clear as to whether independent newsrooms had to agree to certain terms in order to receive funds, as reported by the International Press Institute.¹²

The only other route through which the Maltese government "supports" local media is direct advertising booked by ministries or state entities, however, allocation of this type of "funding" is not transparent, and there is no control or checks and balances to monitor fair distribution amongst outlets. This means that the state can choose to favour some media outlets over others, as was exposed in January 2022, when 18 ministers and parliamentary secretaries paid €16,700 worth of public funds for ads in a single edition of the *Partit Laburista's* Sunday newspaper *Kullhadd*.¹³

This lack of transparency has led NGO Repubblika to propose guidelines for public advertising.¹⁴ The NGO reports that "expenditure in the media, particularly print media, on a discretionary and discriminatory basis is rampant." This was further highlighted by The Shift News in an investigative piece about how the government favours advertising agencies with close links to the party in government with direct orders.¹⁵

8 L. Vassallo, Monitoring media pluralism in the digital era: application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report : Malta, EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, Country Report - <https://hdl.handle.net/1814/75731>

9 Statista, Market Insights: Digital Media – Malta, 2023, <https://www.statista.com/outlook/dmo/digital-media/malta>

10 M. Vella, Newspapers to get €500,000 fund as Ukraine war pushes up price of paper. MaltaToday, 2022, https://www.maltatoday.com.mt/news/national/116885/newspapers_to_get_500000_fund_as_ukraine_war_pushes_up_price_of_paper.

11 Arts Council Malta, Newspapers Support Scheme, 2023, <https://artscouncilmalta.gov.mt/pages/funds-opportunities/opportunities/newspapers-support-scheme/>.

12 International Press Institute, COVID-19 adds to press freedom challenges in Malta, 2020, <https://ipi.media/covid-19-funds-threaten-media-independence-in-malta/>.

13 T. Diacono, 18 Ministers Paid Labour €16,700 In Public Funds To Run Ads In A Single Newspaper Edition, 2022, <https://lovinmalta.com/news/18-ministers-paid-labour-e16700-in-public-funds-to-run-ads-in-a-single-newspaper-edition/>.

14 Repubblika, Draft guidelines on information and advertising campaigns by government, 2021, <https://repubblika.org/wp-content/uploads/2021/05/Draft-guidelines-on-public-advertising.pdf>.

15 E. De Gaetano, *Propaganda propping up a party*. The Shift News, 2023, <https://theshiftnews.com/2023/04/10/propaganda-propping-up-a-party/>.

Safety of local journalists- Medium risk (60%)

Malta is small, so all locations are within reach of all journalists. Where they are based has no consequence on access and they operate from all areas within the territory. There are no news agencies in Malta, only national news outlets.

When it comes to employment, and still considering the national media as local, the overall observation is that there is a slight increase in the number of journalists in employment, mainly because of the launch of new digital native news outlets. In contrast, though, the president of the Institute of Maltese Journalists (IGM) has confirmed that, overall, working conditions for journalists have worsened since spending budgets by media outlets have decreased, leading to the refusal of any employee requests for a salary increase.¹⁶ The consequences of this scenario are even more serious, when taken in the context of an ever-increasing cost of living.

In relation to the role of journalists' organisations, the Institute of Maltese Journalists does not (and cannot, in practice) ensure professional standards and editorial independence. They have guidelines, but these are not binding. Additionally, they had committed to updating their code of ethics some 2-3 years ago, but to date this has not happened.

When it comes to SLAPPs, a 2023 analysis by the Coalition Against SLAPPs in Europe (CASE)¹⁷ shows that, in 2022, Malta had the highest number of SLAPPs per capita in Europe, with 19.93 cases per 100,000 people. The data included multiple cases brought by a number of ministries and state agencies against the online investigative portal The Shift News, in relation to 40 Freedom of Information requests that had been denied. The gravity of the staggering number of cases faced by the Shift News is further highlighted by the case of the journalist Daphne Caruana Galizia, assassinated in 2017, who faced 43 civil and five criminal lawsuits at the time of her assassination.¹⁸ Malta's SLAPP score is even more significant when compared to Europe's second-most SLAPPED country, Slovenia, which had just 2.02 SLAPPs per 100,000 citizens in 2022.

Harassment of journalists and media entities, as reported by the ECMPF's Mapping Media Freedom, also include: a large-scale disinformation campaign¹⁹ targeting six independent media outlets and a news blogger, through the creation of spoof websites and the sending of fake emails to newsrooms, with the primary objective of spreading false facts; DDoS attacks from unknown actors; legal threats by members of the business community; and consistent denials of FOI requests made by newsrooms to the state and its entities.

Editorial independence - Very high risk (84%)

In Malta, political parties can legally own and operate media outlets. Both the two largest parties in Malta, the PL, currently in government, and the PN, in opposition, own and operate TV and radio stations, online news media formats and publish daily and weekly newspapers. This is problematic not only in terms of political control, but also because commercial entities have a strong influence on both the PL and the PN, in view of weak party financing regulations, resulting in both direct and indirect pressure on newsrooms.

In 2021, the Lovin Malta newsroom, a commercial, news and entertainment online site, gave notice that it was going "to start constitutional proceedings against the party-owned stations, arguing that a section of the Broadcasting Act concerning political party stations breaches the spirit of the constitution and must be declared null and void."²⁰ The case is still ongoing, and no developments have been registered.

16 M. Xuereb, President of the Institute of Maltese Journalists (IGM), 21 February 2023, Personal correspondence.

17 Coalition Against SLAPPs in Europe, SLAPPs: Increasingly Threatening Democracy in Europe, 2023, <https://www.the-case.eu/wp-content/uploads/2023/08/20230703-CASE-UPDATE-REPORT-2023-1.pdf>.

18 J. Balzan, Malta with highest number of SLAPPs per capita in Europe, Newsbook, 2023, <https://newsbook.com.mt/en/malta-with-highest-number-of-slapps-in-europe/>.

19 ECMPF, Mapping Media Freedom - Monitoring Report 2021, 2021, <https://www.ecmpf.eu/wp-content/uploads/2022/02/MFRR-Monitoring-Report.pdf>.

20 I. Martin, Court could decide on the future of ONE, NET, Times of Malta, 2021, <https://timesofmalta.com/articles/view/court-could-decide-on-the-future-of-one-net.843840>.

As outlined in the previous section, the government and its entities are a primary source of advertising income for all media outlets, which is an added risk to editorial independence. The state can use this as leverage to put pressure on newsrooms to report sympathetically on government affairs. Moreover, concerns are also detected when it comes to state subsidies, both in terms of fairness and transparency.

There is no self-regulation structure or mechanism in place. The Institute of Maltese Journalists (IGM) is an association and does not operate as a union. Moreover, "the Institute of Maltese Journalists has yet to find ways of enforcing its code of ethics or update it."²¹ The IGM's intention is to develop into a self-regulatory structure, but this has seen little progress, mainly in view of the fact that all members on the IGM board are volunteers, who are also full-time journalists, and struggle to put in enough hours to the running of the Institute.

The main characteristics attributed to the Maltese media landscape include "the dependence of the media on the state and major institutions, the tendency to favour advocacy journalism, lack of journalistic autonomy, a high level of political instrumentalization of the media, limited journalistic professionalism and a politicised public service broadcaster."²² As outlined by Reporters Without Borders (RSF)²³, "the ruling party wields a strong influence over the public broadcaster and uses public advertising to exert pressure on private media." Furthermore, RSF highlights how politicians favour specific journalists, for exclusive interviews, over others, who are considered "hostile" and are, consequently, ignored, as well as the fact that the government issues an "access card"²⁴ to journalists, also referred to as a *Press Card*, which gives the latter access to covering government events or press conferences. Some journalists refuse to subscribe to this system, arguing that it should not be up to the state to decide who is a journalist or not. However, these individuals are, in turn, not informed or invited to government press conferences, and instead have to rely on colleagues to let them know when such events are taking place. Assassinated journalist Daphne Caruana Galizia wrote about this system, describing it as an undemocratic and "offensive practice".²⁵

The long overdue media reform law, which is to protect journalists and the journalistic profession, amongst other things, is yet to be proposed, following a draft that had to be retracted.²⁶ Since then, all progress on the reform seems to have stalled completely.²⁷

The only dedicated media authority in Malta is the Broadcasting Authority (BA) which, as the name suggests, covers TV and radio formats. More recently, the Broadcasting Act was amended to include aspects of audio-visual content carried by online news outlets. The board of the BA is composed of 5 appointees, all nominated by the two main political parties, and excludes the participation of all other stakeholders, meaning that the political parties, essentially, regulate themselves. Added to this, the BA tends to focus primarily on PSM, with the view that political party-owned TV and radio stations balance each other out in the polarised content they broadcast, instead of applying the rules of objectivity and impartiality independently and equally to both entities. This stance was highlighted in the Daphne Caruana Galizia Inquiry report²⁸, and described as a misinterpretation of the concept of impartiality.

21 N. Vella, J. Borg and M. A. Lauri, *Ibid.*

22 N. Vella, J. Borg and M. A. Lauri, *Malta's Media System from the Perspective of Journalists and Editors in Journalism Practice*, 2023, DOI: [10.1080/17512786.2023.2199719](https://doi.org/10.1080/17512786.2023.2199719).

23 Reporters Without Borders, *RSF Malta Factsheet*, 2023, <https://rsf.org/en/country/malta>.

24 Department of Information, Department of Information (DOI) Access Card, 2024, <https://www.servizz.gov.mt/en/Pages/Other/Government-Information-Services/Media/WEB001/default.aspx>.

25 D. Caruana Galizia, *On the matter of press cards issued by the Department of Information*. Running Commentary, 2016, <https://daphnecaruanagalizia.com/2016/01/on-the-matter-of-press-cards-issued-by-the-department-of-information/>.

26 A. Taylor, *Maltese journalists up in arms over closed media reform*. Euractiv, 2022, https://www.euractiv.com/section/all/short_news/maltese-journalists-up-in-arms-over-closed-media-reform/.

27 ECPMF, *Malta: Press freedom groups urge PM to deliver strong media law reforms*, 2023, <https://www.ecpmf.eu/malta-press-freedom-groups-urge-pm-to-deliver-strong-media-law-reforms/>.

28 M. Mallia, J. Said Pullicino and A. Lofaro, *Public Inquiry Report Daphne Caruana Galizia - a journalist assassinated on 16th October 2017* (Courtesy translation, v20211024 provided by Daphne Caruana Galizia Foundation), 2021, <https://www.documentcloud.org/documents/21114883-public-inquiry-report-en>.

Social inclusiveness - Medium risk (57%)

There are no legally recognised minorities in Malta. Of course, minorities do exist in Malta and, over the last ten years, the number of third country nationals residing and working in Malta has increased exponentially. According to the latest census, more than one in five residents are foreign, with 115,449 non-Maltese persons residing in Malta, an increase of more than five times in the share of foreigners since 2011.²⁹ The *Times of Malta*³⁰ reports that, according to figures tabled in parliament in January 2024, as of July 2023, there were 68,755 workers in Malta from outside the EU, the largest number coming from India (13,158), followed by the Philippines (9,560), Nepal (8,157) and the United Kingdom (5,144). Countries that also have a significant number of workers in Malta include Serbia (4,106), Albania (3,418) and Colombia (3,149).

So, whilst minorities do exist in Malta, they are largely invisible or under-represented in the local media landscape. PSM broadcasts mainly in Maltese, with one short, daily news bulletin and the odd programme, possibly imported, in English, which is not a minority language, but the second official language in Malta. In a nutshell, the only languages used within the Maltese media landscape are Maltese and English, with the exception of some content to be found on the African Media Association³¹ site, which includes some content in French and Arabic, even if this is limited and not updated regularly.

In reference to the Fifth Opinion on Malta,³² Human Rights NGO Aditus highlights Malta's stance that "there are no national minorities in Malta", and expresses concerns about the lack of opportunities for individuals to receive information.

In essence, Malta seems to rely on the fact that all non-Maltese residents speak and understand English, and when it comes to broadcast formats, practically every station broadcasts mainly in Maltese, whilst English tends to be more dominant in print and online media. Furthermore, there is no obligation for PSM to represent minorities, specifically, in a fair and adequately representational manner and, according to the Broadcasting Authority, when it comes to the portrayal of minorities in broadcasting, there is no policy in place, except for general provisions of balanced, fair and impartial representation.³³ Ultimately, it follows that there is nothing legally binding the Broadcasting Authority to introduce regulations ensuring that minority languages are included in news content, since there is no legal framework upon which such measures can be based. Moreover, when minorities are represented, it is generally in relation to irregular immigration arrivals or deportations, or news that concerns accidents and crime.

There are no outlets or channels specifically addressing marginalised groups in Malta. This is not to say that women, members of the LGBTIQ+ community or persons with a disability are not represented. However, there is no measure available for this.

Malta, which is one of the few countries in the world to have made LGBT rights equal at a constitutional level, ranks high in LGBTIQ+ civil rights, and this is also generally reflected in most media formats.

Persons with disabilities are sympathetically portrayed, even if content is often in relation to the disability itself. Malta's 2021–2030 National Strategy on the Rights of Disabled Persons states that "accessing culture and leisure through the media require conformity with certain processes, and the inclusion of elements such as closed captioning, also in light of EU legislation binding Malta such as the European Accessibility Act and the Audio-Visual Media Services Directive. Finally, the ever-present challenge of ensuring correct, rather than tragedy-based and medicalised portrayal of disabled persons through the local media, is again brought up, with the aim of enabling disabled persons to both feel comfortable engaging in the media, and

29 National Statistics Office, Census of Populations and Housing - Final Report: Volume 1, 2023, <https://nso.gov.mt/wp-content/uploads/Census-of-Population-2021-volume1-final.pdf>.

30 D. Ellul, Identità increases work permit fees for non-EU workers, *Times of Malta*, 2024, <https://timesofmalta.com/articles/view/identita-increases-work-permit-fees-noneu-workers.1077309>.

31 African Media Association, Landing page, 2024, <https://www.africanmediamalta.com/>.

32 Aditus, Malta and national minorities: what does the Council of Europe say?, 2021, <https://aditus.org.mt/malta-and-national-minorities-what-does-the-council-of-europe-say/>.

33 Dr J. Spiteri, CEO Broadcasting Authority, 17 November 2022, Personal correspondence.

also participating in media experiences on the same basis as others." ³⁴ The report also includes a page about representation and captioning, however, beyond listing desired results, there is no concrete strategy as to how these will be achieved.

When it comes to accessibility, sign language is only used in broadcasts of national interest. In 2021, the PSM chairperson announced that the upcoming 2021-2022 schedule would include more sign language programmes to truly affirm inclusion, ³⁵ on observation of current content, this does not seem to be the case.

Overall, although national media provide sufficient public interest news to meet the critical information needs of the communities they serve, and there is no real need for additional "local media" outlets, the issue remains that the media landscape is dominated by PSM and political party-owned outlets, especially when it comes to broadcast and, more specifically, TV. ³⁶ Consequently, the editorial line of political parties dominates the narrative. A number of independent media outlets cover important stories that are of interest to the general public, as well as smaller communities that might be underrepresented, however, these are primarily online and print formats, and there is no official data that can gauge their level of engagement and reach.

Best practices and open public sphere

Maltese civil society has not felt the need to demand the strengthening of community (or local) media, since the media landscape is already oversaturated as it is, and the need for community media is not felt. However, initiatives that are worth noting are podcasts like the one launched by interviewer Jon Mallia, ³⁷ who conducts lengthy, one-on-one, in-depth interviews, and The SHE Word, ³⁸ a discussion programme dedicated to women's issues, both available on Patreon and social media platforms like YouTube and Instagram, as well as Repubblica LIVE broadcasts on Facebook. Repubblica is a Civil Society NGO, which, from time to time, organises online broadcasts in the form of discussion programmes, covering current affairs issues. Additionally, a newcomer to the blogging/in-depth reporting community is the online site the Critical Angle Project, ³⁹ launched by freelance journalist and activist Julian Delia, and which includes a highly visual and detailed timeline, presented as a repository of public domain information about Malta's most significant corruption scandals over the past decade.

Some news outlets, like *Newsbook*, have developed their own applications. The *Times of Malta* discontinued its dedicated app in favour of a more mobile phone-friendly design for their portal. Additionally, online formats linked to legacy media (the *Times of Malta*, *MaltaToday*, *The Malta Independent*, *Newsbook*) have increased their audio-visual content, and the majority of media outlets are present and active on social media platforms, so as to extend outreach.

Apart from straightforward advertising bookings, online outlets like Lovin Malta have a strong lifestyle component, since they target a younger demographic, with events like the Lovin Malta Social Media Awards.

34 Ministry for Inclusion and Social Wellbeing, *Freedom to Live | Malta's 2021 – 2030 National Strategy on the Rights of Disabled Persons Consultation Document*, 2021, p. 48, https://meae.gov.mt/en/Public_Consultations/MISW/PublishingImages/Pages/Consultations/Maltas20212030NationalStrategyontheRightsofDisabledPersons/Proposed%20National%20Disability%20Strategy%20%E2%80%93%20Standard%20English%20version.pdf.

35 A. Rossitto, PBS launches new news station, TVM News, 2021, <https://tvmnews.mt/en/news/il-pbs-iniedi-stazzjon-pbs-launches-new-news-station-tvmnews-tal-ahbarijiet-tvmnews/>.

36 Fsadni & Associates, Broadcasting Authority Audience Survey - May 2023, 2023, https://www.dropbox.com/sh/9oxo9v3ohs3tov0/AAAFZGy4vXoy-ZYeQ6ppqfr3a/B.A.%20Audiences/Audience%20Assessments/2023-May?dl=0&preview=Audience+Survey+May+2023.pdf&subfolder_nav_tracking=1.

37 Jon Mallia, <https://www.patreon.com/jonmallia>.

38 The SHE Word, <https://www.patreon.com/TheSHEWord>.

39 J. Delia, The Critical Angle Project landing page, 2024, <https://cap.mt/>.



Poland

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Context

Polish policymakers, as well as the public, seem to overlook the problem of “news deserts”, which until recently remained completely unrecognised. In response to the wave of bankruptcies and closures of local independent media, some civil society initiatives have been launched to identify them. In order to list this type of media and develop current maps of their coverage a call for applications was announced in the first weeks of 2023.¹ Apart from this project, led by Katarzyna Batko-Tołuć, the concept of “information deserts” is not included in Polish media legislation or the industry debate.

The map developed in the above-mentioned project shows regions where there are “news deserts”. In many areas of the country there are places where not a single type of independent media applied for the project, which can be interpreted as their complete absence. Interviews and analysis conducted as part of the LM4D project confirm the above data.

An important problem in the context of “news deserts” in Poland is that in many regions the only local media are local government media, most often at the service of politicians holding power in the region. These media belong to local government authorities (municipalities, counties, voivodeships), are financed by these local governments and are subject to their control and influence. Therefore, the local media function in these areas, but it cannot be said that it performs its basic functions, such as scrutinising local authorities or providing reliable information for the audience.

The definition of a local broadcaster does not exist in the Polish legal system², nor a local media definition. However, the national regulatory body, the National Broadcasting Council (KRRiT), according to the position on 10 June 2008, has qualified for broadcast on local issues topics such as: current events and problems concerning the local community; culture and history of a given region; useful local information.³ There is no definition of community media in media law, while there are many ambiguous, often misleading terms referring to this sector.

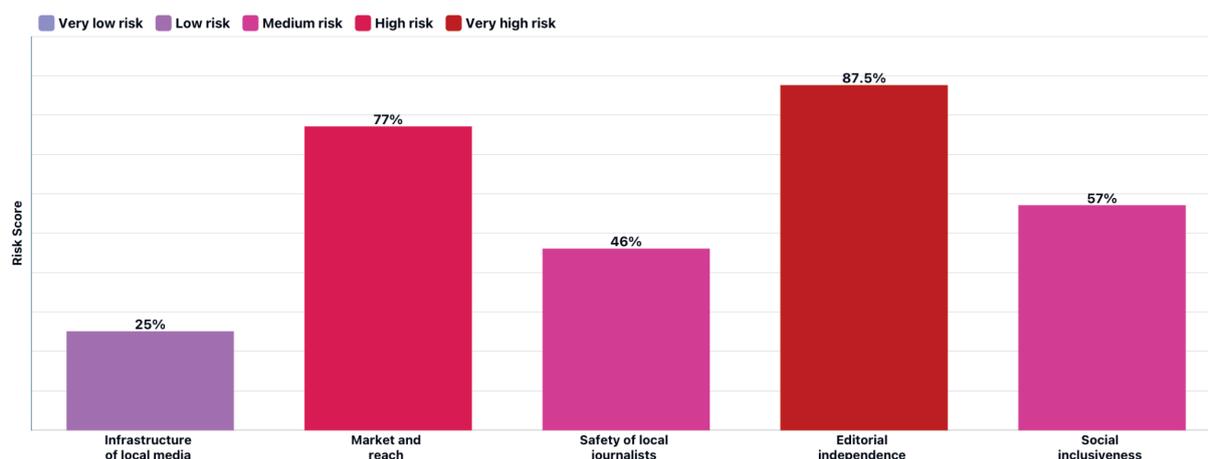
In media law exists the concept of community broadcaster (exempt from license fees, cannot broadcast advertising). However, this option is so unattractive that currently this role is performed by only nine broadcasters. All entities are church media.⁴

1 K. Batko-Tołuć, *Pustynie medialne - media niezależne, 2023*, <https://www.google.com/maps/d/u/0/viewer?mid=1KbrxGyPQSJ5RLB9e-WnKEa3FRFljSpd8&ll=52.87803907871886%2C20.229565266399156&z=7>

2 KRRiT, Response to the request for access to public information issued by the researcher, dated 25 May 2023, 2023.

3 M. Kornacka-Grzonka, *Media lokalne Śląska Cieszyńskiego. Historia i współczesność*, Wydawnictwo Uniwersytetu Śląskiego, Katowice, 2019.

4 Krajowa Radiofonii i Telewizji. *Wykaz nadawców społecznych (stan na dzień 30 września 2021 r.)*, 2021, <https://www.gov.pl/web/krrit/nadawcy-spoeczni>



Granularity of infrastructure of local media - Low risk (25%)

The local press in Poland is most often published in the main cities of the *poviats*⁵ to which individual rural areas belong. Media consumers using the paper edition of the local weekly regularly, are mainly inhabitants of villages (28.3%) and towns with a population of up to 50,000 (21.7%).⁶ Internet penetration in rural areas is systematically increasing.⁷

Local press titles are also published in small communes with a population of several thousand people, but the distribution and reach of the editorial offices are diverse and impossible to systematise. This is especially because there is also a group of publishers in Poland that are not affiliated at all, making it difficult to find them and recognise the reach of their media.

The data of the “Civic Network” show that about 58% of municipal governments run their own print media outlets. This is valid for 80% of local governments, counting for about 1,160 press titles.⁸

There are 118 independent local radio stations in Poland, according to a 2021 KRRiT report. Unfortunately, their area of influence can be considered small, as they cover only 18.75% of the country.⁹ According to the same report, local community radio only covers 3.5% of the country, local government radio 3.67%, academic radio 1.26%. The situation is different for so-called “socio-religious” radios, such as *Radio Maryja* and *Radio Plus*. Their range covers almost the whole country very thoroughly.¹⁰ The range of groups of individual radio stations is quite limited, but the combined range of local stations of *Eurozet*, *Agora*, *RMF* and *ZPR Media* cover the whole country, including rural areas, except for the Warmian-Masurian and Kuyavian-Pomeranian voivodeships.

Regional branches of public service media—TVP and Polish Radio—cover well the whole country. In the case of Polish Radio's regional stations, the north and north-east of the country are a relatively “empty” places. Population coverage of Polish Radio regional programmes comes to 36,969 thousand people.¹¹

5 The local self-government community (all inhabitants) and the appropriate territory, i.e. a unit of basic territorial division covering the area of several to a dozen or so communes or the entire area of a city with poviats rights (i.e. a commune with city status that has been granted poviats rights). GUS, https://stat.gov.pl/metainformacje/slownik-pojec/pojecia-stosowane-w-statystyce-publicznej/811_pojecie.html

6 Stowarzyszenie Mediów Lokalnych. *Stan i kierunki rozwoju mediów zrzeszonych w Stowarzyszeniu Mediów Lokalnych oraz wybranych mediów lokalnych w Polsce*, 2022.

7 IAB Polska. *RAPORT STRATEGICZNY Internet 2021/2022*, 2022, <https://raportstrategiczny.iab.org.pl/wp-content/uploads/2022/06/Raport-Strategiczny-2022.pdf>

8 Sieć obywatelska. Watchdog., Fundacja Wolności, *Media lokalne jako warunek zapewnienia praworządności na poziomie lokalnym. Jak budować ich odporność?*, 2023.

9 KRRiT. *Sprawozdanie Krajowej Rady Radiofonii i Telewizji z działalności w 2020 roku*, 2021, <https://www.gov.pl/web/krrit/sprawozdanie-z-dzialalnosci-krrit-za-2020-rok>

10 KRRiT. *Sprawozdanie Krajowej Rady Radiofonii i Telewizji z działalności w 2022 roku*. 2023, <https://www.gov.pl/web/krrit/krrit-przedstawi-la-sprawozdanie-z-dzialalnosci-w-2022-r>

11 KRRiT. *Sprawozdanie Krajowej Rady Radiofonii i Telewizji z działalności w 2020a roku*, 2021, <https://www.gov.pl/web/krrit/sprawozdanie-z-dzialalnosci-krrit-za-2020-rok>

The KRRiT granted 166 licences for programmes broadcasted on cable networks, and two licences are used to provide local programmes distributed in local multiplexes.¹² This number is changing, but in recent years a downward trend is observed.¹³ Virtually all local broadcasters broadcast their programmes on cable networks, which are trying to expand their reach.

In the largest Polish metropolises, apart from a few exceptions, there are no publishers of independent local press and local information portals. City dwellers can therefore draw information almost exclusively from the local titles of *Polska Press*, which belongs to the State Treasury Company PKN Orlen. In 2021, the number of local weeklies published by *Polska Press* fell to 94, and 2022 brought further closures (it is estimated that over 30 titles were liquidated). *Polska Press* also publishes 23 regional information services and has 109 editorial offices in Poland. Its publications are therefore widely available in cities, but they are largely influenced by political propaganda.

Market and reach - High risk (77%)

Data on local media market revenues are dispersed and only preliminary conclusions can be drawn based on partial sources. Local media in Poland have been facing increasing difficulties in recent years, worsened by financial problems after the pandemic: closed points of sale, a decrease in the number of advertisements or payment backlogs.¹⁴ There is no systemic financial and legislative support for them. This was fundamental for establishing a new order in the local newspaper market, because the German Verlagsgruppe Passau, hit by advertising revenue losses, agreed to sell the Polska Presse Group to the state-owned oil company Orlen in December 2020. Thus, a kind of nationalisation of many local editorial offices took place and, consequently, led to an increase in political media influence.

Basic problems are the drastic increase in costs and liquidation of distribution points for paper press.

The main difficulties for local media include factors such as the war in Ukraine and related inflation, rising energy and paper costs, but also labour shortages, and a structural decline in advertising revenues. The digital transformation and shift of readers online is also very significant. The greatest threat to local digital media has turned out to be municipal media, which also have a devastating impact on the local printed press sector. According to experts, this necessitates a public debate and legal clarification of how local governments should spend their money on promotion. Local government media are financed by local institutions directly and indirectly (e.g. local government employees write articles for them), while pretending to be independent and entering into unfair competition with local independent media.

Local independent publishers are struggling to maintain their position in the market, develop subscriptions, invest in digital tools and gain new users online, but the market shows that recipients are generally not willing to pay for local news. In Poland, there are practically no examples of large sales of local media with the help of a paywall or crowdfunding.

Local radio stations are also falling into crisis, which in their case is dictated, among other things, by a drastic increase in energy prices, even by 300%. Many stations, including those with a long tradition, had to stop broadcasting.

The pandemic has ultimately disrupted the local TV business model, leading to a 30 to 50% decline in advertising revenue across various local TV stations. Experts agree that the financial situation of local television stations can be described as "a state before agony"; many survive only because, in addition to their media activities, they generate income, e.g. from filming weddings¹⁵ In recent years the number of cable operators offering a local TV station has also decreased.¹⁶

One challenge is also represented by the arbitrary allocation of state or public entities' advertising. Media financial independence and press pluralism are described in the press law but not implemented in practice.

12 KRRiT. Response to the request for access to public information issued by the researcher, dated 25 May 2023, 2023

13 P. Różycki, Member of the Management Board of TV ASTA, 5 October 2023, phone interview.

14 P. Piotrowicz, president of the management board of the Local Media Association. 10 May 2023, online interview.

15 K. Pstrąg, Director General of the Polish Chamber of Electronic Communications, 10 October 2023, phone interview.

16 P. Różycki, Member of the Management Board of TV ASTA, 5 October 2023, phone interview.

Safety of local journalists - Medium risk (46%)

The vast majority of local journalists experience financial difficulties, face a lack of professional stability in the case of independent media, or need to accept political pressure in media related to the state or local government.

Many journalists work on mandate contracts and contracts for specific work, which provide almost no social benefits. Contracts of employment (with full social care) were used mainly for the oldest titles on the market, but this is changing, as publishers are trying to bind journalists with their media.

Freelance work is done mostly on the basis of self-employment or two types of contracts: a contract for a specific task and a mandate contract. Depending on the contract chosen, income varies greatly (e.g. paying social security contributions on their own). The last two forms are the so-called junk contracts and for many journalists these turned out to be particularly unattractive during the pandemic, which significantly limited their possibilities of professional activity while not providing any social support.

Local journalists, regardless of the type of employment, face the challenges of multitasking and the implementation of a whole range of editorial tasks by one person or a team reduced to a minimum. Earnings depend on the editorial office. There is no hard data. From publishers' reports, it seems that they are closer to the minimum wage than the national average.¹⁷

Publishers pointed to the low availability of journalists on the labour market, especially in smaller cities, the unsatisfactory preparation of graduates in the profession, and the ageing of journalism. Local media themselves prepare people for journalistic work, who usually come from other professions. Publishers notice that the profession of journalism has lost its prestige in society's eyes.¹⁸

The situation of journalists of local titles from Polska Press after its takeover by Orlen turned out to be particularly difficult, finding themselves in the face of political influence. Working conditions in local government media are a separate issue because in large part these media are not composed of journalists at all, but of local government officials.

Representatives of local media interviewed by a researcher report that they have not encountered physical attacks on local journalists, while as for online attacks, they are common, but they are not much of a hindrance to work. Journalists add that they are often victims of hate speech and have to deal with it on a daily basis.

A serious problem for local journalists are lawsuits, which are, even if they do not result in a court verdict, unfavourable to publishers and editors, because they still effectively engage their time and money resulting in chilling effects on their work. SLAPP cases are severely underestimated for several reasons: a lack of awareness that a pending case may be a SLAPP case and the reluctance of journalists to inform the public about having such a problem. An equally great threat to local media are private accusations of defamation, under Art. 212 of the Criminal Code. Poland regularly loses cases under Art. 212 before the European Court of Human Rights.

The Association of Polish Journalists and the Association of Journalists of the Republic of Poland are the largest organisations and gather mainly national media journalists, but also have regional branches. However, experts point out that none of them operate effectively at the local level, where two associations are currently the most important: the Association of Local Newspapers and the Association of Local Media. Expert states that journalistic organisations have minimal impact on the editorial independence of journalists¹⁹, which depends primarily on the editorial staff. Media concentrated in the two organisations mentioned above focus on control functions, so must pay attention to independence and professionalism.

17 A. Andrysiak, president of the Association of Local Newspapers, May 2023, email and phone interview.

18 Stowarzyszenie Mediów Lokalnych. *Stan i kierunki rozwoju mediów zrzeszonych w Stowarzyszeniu Mediów Lokalnych oraz wybranych mediów lokalnych w Polsce*, 2022.

19 P. Piotrowicz, president of the management board of the Local Media Association, 10 May 2023, online interview.

Editorial Independence - Very high risk (87.5%)

The indicator editorial independence scores a very high risk of 87.5%, representing the highest risk score across all the indicators under analysis.

In Poland, relevant legislation lacks regulatory safeguards to limit political control over the media through ownership. In these terms, an alarming element is the activity of Polska Press, which brings together a significant part of regional titles. It was bought by a state-owned company and key decisions are made from a political and not business point of view, which means, for example, personnel exchange in the acquired media or the issuing of central instructions regarding the editorial line. Daniel Obajtek, President of PKN Orlen, is a man so closely associated with the ruling party that he was even tipped to be prime minister. Immediately after taking over the media company, he introduced Dorota Kania—a journalist who positively highlights the actions of the authorities—to its management board.

Moreover, one of the most pressing problems on the Polish local media market in terms of political influence is that, according to various estimates, more than 55% to 60% of Polish communes run press (paper and online versions) that pretend to be part of the local media market. These are publications that are fully controlled by the authorities issuing them and which do not offer reliable information. At the same time, great care is taken to distribute such information, which is easily accessible and free. This destructive activity has already been indicated by The Ombudsman, the complaint was also sent to the Helsinki Foundation for Human Rights.²⁰

The first tool of political pressure on local media is money, and the unfair and non-transparent allocation of state subsidies and state advertising have become an everyday occurrence.

State advertising is not allocated to independent local media. Specialists and journalists of independent local media agree that they have not encountered such government support (in any sector).

Funds awarded through the National Institute of Freedom (state subsidies) are granted for the outlets close to the ruling party. The rules and procedures for granting them are unclear, unreliable and non-objective. Government subsidies granted to the media under the Government Program for the Development of Civic Organizations PROO are, to a large extent, granted for the media run by politicians of the ruling Law and Justice party. On the other hand, professional media at the local or regional level are supported on a discretionary basis - both by the government and local government.²¹ The situation of local PSMs is unique, as well as Catholic media, including, above all, radio Maryja and TV Trwam, which are intensively supported by the state (subsidies and advertising).

Moreover, as local journalists emphasise, close relationships in local communities do not facilitate independence; for example, one can take advantage of the situation of other people in the family (e.g. local authorities influencing the employment of family members, their working conditions in offices or local companies). There are also attempts to solicit / bribe journalists from independent media, offering them work in promotion departments or in newspapers run by local governments.

In terms of commercial influence over editorial content, sponsored materials are marked in a non-transparent way, especially when it comes to websites. The Media Ethics Council (REM) indicates that surreptitious advertising appears more often, because of the difficult financial situation of the media. In order to survive, they must publish, apart from advertising, paid texts, expressing only the views of those who finance them.²²

The National Broadcasting Council does not have local branches, but its statutory competence does cover matters relating to audio-visual, local media, including broadcasters of local radio and television programmes, operating both in the private (commercial) and public sectors. The Council's ability to fulfil its constitutional mission has been limited by the policy of the Law and Justice party, which deprived the Na-

20 Krytykapolityczna.pl, K. Woźnikowski, *Kto zdelegalizuje media samorządowe? PiS zabiera się za relikw z lat 90*, 2023, <https://krytykapolityczna.pl/kraj/pis-media-samorzadowe-wolne-media-andrysiak/>

21 K. Batko-Tołuć, Programme Director and a Board Member of the Citizens Network Watchdog Poland, 22 May 2023, email interview

22 REM, *Odpowiedź na skargę*, 2022, <https://www.rem.net.pl/data/20220720.pdf>

tional Council of influence on the management and supervisory boards of public media companies (TVP and Polskie Radio), as well as on the content of the articles of association of these companies.²³

The specific takeover of public media by the former ruling party had an impact on the situation of the regional branches of both TVP and Polish Radio. Shortly after the 2015 elections, layoffs of local public media journalists began. Government has systematically taken over the public media, "filling with its people" all important positions in the organisational structure of the public broadcaster, leading to internal censorship and loss of independence of the PSM regional branches.

Independent local media offer a message that is rich, diverse, and tailored to the needs of their local audience: local political and social information, local activities and events, supporting projects that help and mobilise local communities. They are an important element in the landscape of Polish culture at the local level because they convey a significant part of information about the culture of local communities. Editorial offices of press titles and local/regional portals belonging to Polska Press remain under political influence, manifested in the style of informing, the selection of experts and the selection of topics. The message of local public media is also under political influence, manifested in its frequent one-sidedness, despite the rich programme offer.

Social inclusiveness - Medium risk (57%)

PSM channel TVP broadcasts programmes for national minorities (Ukrainian, Russian, Belarusian, Lithuanian, German, Kashubian) in six of its local branches.²⁴ In 2021, the number of hours increased to 177. Programmes for national and ethnic minorities and for the community using the regional language are currently broadcast in the programmes of twelve regional radio stations, a total of 1,695 hours since 2021.²⁵

Due to the current political situation in the region, a minority that has become particularly present in the public media (and not only) in Poland is the Ukrainian minority. The offer of regional TVP branches includes programmes about the Ukrainians in their country and about Ukrainian refugees in Poland.

As for the situation of other minorities, their representatives themselves indicate that they do not feel sufficiently represented and some have the impression that "non-Polish" topics are not welcome on PSM. Their representatives have not been in the programming councils of public media for several years, even though they submitted their candidates at each recruitment.²⁶

The public service media relatively rarely broadcast programmes covering some aspects of the lives of non-recognised minorities.

The main problems of the media for marginalised groups remain small funds and lack of financial support.²⁷ They function mainly thanks to the help of donors and small advertising revenues. Often at its base is the volunteering of journalists. This translates into irregular releases, low frequency, and delays. The public broadcaster presents an offer specific to some group (seniors, people with disabilities), but it is small, and there is no offer for the LGBT group at all. The internet is an essential tool in formulating the message about these communities, whether in the form of thematic portals, information portals (also at the local level) or internet radio.

Independent local media offer their recipients a wide range of news, largely satisfying their information needs, however, it should be noted that the number of these media is insufficient, and a significant part of the recipients do not have access to them. Furthermore, the widely available media of local governments and of the Polska Press group are deprived of independence, therefore it cannot be said that they satisfy CINS at the appropriate level.

23 Press.pl, M. Niedbalski, *KRRiT wciąż bez wpływu na wybór władz mediów publicznych. Ponad 6 lat od wyroku TK*, 2023, https://www.press.pl/trzeci/76188_po-ponad-szesciu-latach-od-wyroku-trybunalu-konstytucyjnego-krrit-wciaz-bez-wplywu-na-wybor-wladz-mediow-publicznych

24 MSWiA, *VIII RAPORT dotyczący sytuacji mniejszości narodowych i etnicznych oraz języka regionalnego w Rzeczypospolitej Polskiej w latach 2019-2020*, 2022, <https://www.gov.pl/web/mswia/viii-raport-dotyczacy-sytuacji-mniejszosci-narodowych-i-etnicznych-w-rzeczypospolitej-polskiej-w-latach-2019-2020>

25 KRRiT, *Sprawozdanie Krajowej Rady Radiofonii i Telewizji z działalności w 2022 roku*, 2023, <https://www.senat.gov.pl/gfx/senat/userfiles/public/k10/dokumenty/druki/1000/1002.pdf>

26 J. Hassa, director of the office of the Association of German Social and Cultural Associations in Poland, 15 May 2023, email interview.

27 D. Mękariski, member of the Replika magazine team, June and October 2023, phone interview.

Best practices and open public sphere

The issue of the decline of local and community news seems to be clearly emerging in the social consciousness only now and is gradually beginning to arouse the interest of activists.

One major initiative undertaken in this dimension is the project to create an online map of independent media. The point is to stimulate social awareness, but also to draw the attention of the authorities and institutions in charge of the oversight of the problem.

A difficult financial situation is not conducive to searching for new solutions and forms of activity by the editorial offices themselves. Therefore, the initiatives of local media organisations are important, as they try to improve the quality and editorial independence of these media through training and helping local publishing houses in digital transformation, including using foreign grants, like the "Election Auditor of the Local Media Network" financed from the so-called Norwegian Funds²⁸, the "E-journalism university", expanding knowledge of online journalism, or "Locals for Democracy".²⁹

Very valuable are academic initiatives aimed at analysing community media, which are still very poorly defined and recognised in Poland. An important example is the Monitoring Centre for Online Citizen Journalism operating at the Institute of Journalism and Social Communication of the University of Warmia and Mazury, which creates the Catalogue of Online Citizen Media in Warmia and Mazury. The project was co-financed from the state budget under the programme of the Minister of Education and Science called "Science for Society".³⁰

28 Press.pl, Zaproszenie dla niezależnych mediów lokalnych, 2022, <https://www.press.pl/tresc/73884.zaproszenie-dla-niezaleznych-mediow-lokalnych>

29 P. Piotrowicz, president of the management board of the Local Media Association, 10 May 2023, online interview.

30 IDZIKS, 2023, <https://cmidzo.uwm.edu.pl/>



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Context

Portugal emerged from a dictatorial regime in 1974. From then on, there was a proliferation of local media, mainly radio, called “pirate radios”.¹ Local newspapers also increased, but often with solid ties to municipalities, which meant their independence was called into question². Television continued as a national trend, with some projects launched, but without much of a future. The international media crisis in the first decade of the 20th century led to many local print newspapers closing without being replaced by local online media³.

The topic of news deserts has yet to expand in the Portuguese political and societal agenda. The current debate about it is residual and confined to academia and newsrooms. In 2020, the first map of news deserts in Portugal was published informally by Giovanni Ramos, a PhD researcher, on his blog.⁴ In 2022, the MediaTrust.Lab project took over the study and published “News Deserts Europe 2022: Report from Portugal”, which received some media attention, mainly from local media.⁵ At the beginning of 2023, the launch of the European programme “Local Media for Democracy”, co-financed by the European Union and involving a consortium of four institutions, contributed to introducing the topic into newsrooms.

With around a 90,000 sq. km. land area and a population of about 10,5 million, Portugal has an internet penetration rate of 82%. In 2022, the highest rates were in the Lisbon Metropolitan Area (93.9%), the Autonomous Regions of the Azores (93.5%) and Madeira (90.8%), and Algarve (89.6%). The lowest rates are recorded in the central region: 84.4%. However, there is no clear correspondence between news deserts and the internet penetration rate. Similarly, there is also no correspondence between the most economically disadvantaged areas and the existence of news deserts.

1 L Bonixe, ‘As primeiras experiências de radiodifusão local em Portugal (1977-1984)’ (2019) *Media & Jornalismo*, 19(35) 183-195.

2 P Jerónimo, *Media e Jornalismo de Proximidade na Era Digital* (Labcom 2017).

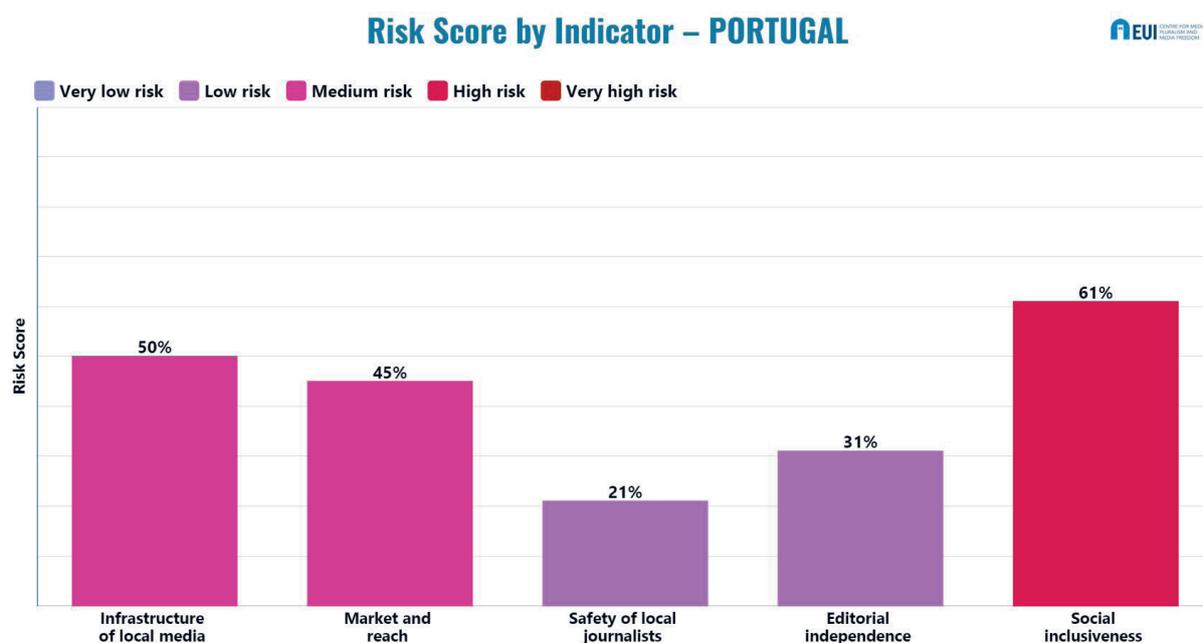
3 C Baptista, M. Torres da Silva, “Media diversity in Portugal: political framework and current challenges” (2017) *Media & Jornalismo*, 17(35) 11-28.

4 <https://gioramos.net/blog/desertonoticiaspt/>

5 P Jerónimo, G. Ramos, L Torre, *News Deserts Europe 2022: Portugal report* (MediaTrust.Lab 2022).

Finally, there are no legal definitions for “local media” and “community media”. “Regional media” are defined (Decree-law no. 106/88), and this includes all periodic publications of general information under the Press Law, which are predominantly aimed at the respective regional and local communities. Thus, this definition includes local media. In practice, the general public understands community media as journalistic projects that meet the needs of communities but are not registered as media outlets, primarily because their independence is questionable in some cases and just a hobby in others, or they are projects that arose from civil society, which would aim to be considered media, but do not include professional journalists on their staff.

Based on the results of this research, the highest risk has been noted for the social inclusiveness indicator, while the lowest is for safety of local journalists.



Granularity of infrastructure of local media - Medium Risk (50%)

Urban areas in Portugal are well covered by various media. Suburban areas (excluding the ones located in the metropolitan areas of Lisbon and Oporto) are covered mostly by local newspapers and radio stations. Suburban areas that surround big cities (such as Lisbon and Oporto) are usually covered by national newspapers, radio and TV, but not in a detailed way. These areas are usually misrepresented, and associated only with big headlines such as crime and poverty.⁶ This is why, according to the Media Trust.Lab 2022 study on news deserts in Portugal, more than half of the municipalities can be said to be in a “news desert situation” or on the way to becoming one. The authors of this study considered as “news desert” those municipalities without local news or with just one specialised news media. They considered as “semi-news deserts” the municipalities where the only medium is a newspaper with a frequency greater than biweekly or where the only medium is a radio located in the municipality but without any journalists based in that territory.⁷

People in rural areas have access to information mainly through local newspapers and radio stations or benefit from the news coverage of media located in the nearest cities.⁸ Radio plays an important role in this regard, as there are several programmes dedicated to rural populations. However, many radio stations have assigned frequencies but broadcast programming and information with little link to the regions in which they operate. Communication groups acquire the radio stations in suburban areas to increase their geographical coverage, but without prioritising local programming/information.⁹

6 *Ibid.*

7 *Ibid.*

8 B de Seixas Mendes ‘O Jornalismo local e regional – O caso do Fórum Covilhã’ (2021) Relatório de Estágio, Faculdade de Letras da Universidade de Coimbra, p. 8. Available at https://estudogeral.uc.pt/bitstream/10316/97017/1/BarbaraMendes_-versaofinal.pdf.

9 MJ Taborda, H Pestana, *A Rádio Local na Sociedade Portuguesa* (Estudo, ERC - Entidade Reguladora para a Comunicação Social, June 2023), p. 13. Available at <https://www.flipsnack.com/ercpt/estudo-a-r-dio-local-na-sociedade-portuguesa/full-view.html>.

According to the media authority (in Portuguese, *Entidade Reguladora para a Comunicação Social* - ERC), there were 1,710 active periodical publications at the end of 2022.¹⁰ Of these, around 700 have a regional or local scope (200 online only, around another 200 holding both print and online editions, and 300 print only). Still, when looking at the local and regional print newspapers with significant longevity this number drops significantly. There are only 18 daily regional and local newspapers. Concerning online media, there is a certain resistance from older printed newspapers to migrate online; there are local online editorial projects, but they are more recent.¹¹

Regarding radio, in 2018 there were around 320 local stations, particularly located on the coast, where there is greater population density. There is no local television regulation except for Web TVs.¹²

Besides the headquarters in Lisbon, the public service *Rádio e Televisão de Portugal* (RTP), has a production centre in Oporto, 5 regional broadcasting centres and 3 newsrooms. It also has editorial offices in the Autonomous Regions of Madeira and the Azores.¹³ *Lusa*, the Portuguese news agency, besides the main newsroom in Lisbon, maintains newsrooms and correspondents spread across all districts and autonomous regions, organised by regional editorial offices (North, Center, Alentejo, Algarve, Azores and Madeira).¹⁴

There are no specific data available about the number of local journalists in the recent period but, based on several studies¹⁵, it is possible to say that local media are fragile structures where journalists can take up many functions (not only journalism, but also managing and production, for example). Another 2018 report about local radio¹⁶ concludes that 9,8% of the local radio stations do not include any journalists on their staff, 46,1% of local radio stations employ one journalist only and 32,4% have two, which means that they are dependent on quoting other sources, like the national news agency. The same happens with local newspapers.

The map you can find at the [following link](#) refers to the number of local and regional media in Portugal in 2022. The original data source for this visualisation is Jerónimo P., Ramos G. & Torre L., *News Deserts 2022: Portugal Report* and you can access it [here](#).

Market and reach - Medium risk (45%)

Most of the variables in this indicator have been assessed as medium risk. In the period 2017-2021, the average growth of local media revenue was -0,01%. In the same period, the country's real GDP increased 1,2%.¹⁷ The comparison of these numbers shows that there is no major difference between trends in local media and trends in the economy (overall).

The supply distribution chain has some problems aggravated by the Covid pandemic. One leading press distribution company—VASP, retained by some large media groups—distributes around 4,500 titles to approximately 7,000 points of sale. It has 245 direct workers and 700 collaborators. In May 2021, VASP tried to apply an extra fee for daily delivery to share the costs of transport, delivery and collection of publications. This led to the boycott of several points of sale and several requests for a hearing by the government of

10 AT Esteves, C Martins, 'A Sustentabilidade do Setor da Comunicação Social' (2023) Study carried out by Entidade Reguladora para a Comunicação Social - ERC, p. 58. Available at <https://player.flipsnack.com/?hash=QjdGODIDNkQ3NUUraDNxbzVhM3RrNQ==>.

11 *Ibid.*, 29.

12 G Cardoso, V Baldi, T Lima Quintanilha, M Paisana, P Caldeira Pais, 'As Rádios Locais em Portugal. Caracterização, tendências e futuros' (*Relatórios Obercom, Observatório da Comunicação*, 2018) Available at <https://obercom.pt/wp-content/uploads/2018/04/CIUL-CV-OberCom2018-Rádios-Locais-Characterização-tendências-e-futuros-.pdf>.

13 Felisbela Lopes, *Serviço Público de Média: Livro Branco* (Ministério da Cultura 2023) Available at <https://www.portugal.gov.pt/download-ficheiros/ficheiro.aspx?v=%3D%3DBQAAAB%2BLCAAAAAAABAAzNDY3MQYAkFAjnQUAAAA%3D>.

14 Agência de Notícias de Portugal, S.A. LUSA, *Livro de Estilo* (LUSA 2019) Available at <https://www.lusa.pt/about-lusa/Livro-de-Estilo>.

15 J Miranda, R Gama, 'Os jornalistas portugueses sob o efeito das transformações dos media. Traços de uma profissão estratificada' (2019) *Análise Social*, 54 (230) 154–177. <https://doi.org/10.31447/AS00032573.2019230.07>

16 Cardoso, Baldi, Lima Quintanilha, Paisana, Caldeira Pais (n 12).

17 Eurostat, "Real GDP growth rate - volume, Eurostat - 2023." Available at <https://ec.europa.eu/eurostat/databrowser/view/TEC00>

the then newly created National Association of Press Vendors (ANVI). Meanwhile, steps are being taken to create two other national distribution companies.¹⁸

The Regional Development Coordination Committees manage the Incentive Schemes for Reading Periodical Publications and the state Incentives for Regional and Local Social Communication. The Incentive Scheme for Reading Periodical Publications (*Pay Postage*) consists of the state contributing to the costs of issuing periodical publications. Regarding the state Incentive Scheme for Regional and Local Social Communication, the following types of support are considered: digital development, technological modernisation, accessibility to social communication, development of strategic partnerships, literacy and education for social communication. The state is also obliged to carry out institutional advertising in the media. In the case of regional and local advertising, a percentage of no less than 25% of the expected global cost of each state institutional advertising campaign, with a unit value equal to or greater than 5,000 (euro), must be allocated. However, in 2022, the investment in state advertising dropped by six million euro.¹⁹ The amount allocated to regional and local media outlets, in 2022, was 2,384,267.78 euro, which corresponds to 36.9% of the total invested in the acquisition of advertising spaces. Compared to the previous year, there was a percentage increase of 37% in allocation to regional and local media; however, the overall investment reported was significantly lower.²⁰

The government has also announced plans to increase existing support for the mailing of the regional and local press. The minister for culture has recognised the need and pledged a 12.5% increase, since this funding has been frozen since 2015.²¹ The regional and local press see this increased support as essential to their future. Another—albeit controversial—response was the creation by the government in the spring 2020 of a Covid emergency financial media support scheme, based on compensating for the estimated revenue loss from cancelled corporate advertising. €11.25m was awarded to national media brands and €3.75m to local and regional outlets.²²

The most recent Media Pluralism Monitor (2023) stated that Portugal's risk regarding market plurality is 52% (4% less than in 2022).²³ This is essentially due to the concentration of media and digital markets, because five players control the media business: Impresa, Cofina, Media Capital, Global Media, and RTP (state owned). In the digital environment, large platforms have big market shares in advertising. The regulatory framework does not prevent market concentration, be it within traditional or digital media, which is cause for concern. These players also control some regional and local media.²⁴ The Catholic Church is also, directly or indirectly, one of the main owners of regional and local press.

Safety of local journalists- Low risk (21%)

Journalists working for local media are paid low wages and suffer from the fact that they work in newsrooms with a small number of journalists. According to a 2015 study, the local radio journalists who participated in the study were on average earning the national minimum wage and complained mainly about not being able to get out to report due to lack of human resources.²⁵

18 Madremedia/Lusa "Vai comprar o jornal ao quiosque ou papelaria? Pontos de venda iniciam hoje boicote de dois dias" (June 18, 2021) Available at <https://24.sapo.pt/atualidade/artigos/vai-comprar-o-jornal-ao-quiosque-pontos-de-venda-vao-boicotar-venda-hoje-e-amanha>.

19 Esteves, Martins (n 10) 60.

20 A Nobre, 'Relatório de Regulação: Publicidade Institucional do Estado 2022' (ERC - Entidade Reguladora para a Comunicação Social, 2023) Available at <https://www.filpsnack.com/ercpt/erc-relat-rio-publicidade-institucional-do-estado-2022/full-view.html>

21 A Pinto-Martinho, M Paisana and G Cardoso, "Digital News Report: Portugal" (Reuters Institute for the Study of Journalism, University of Oxford 2023). Available at <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2023/portugal>.

22 *Ibid.*

23 F Rui Cádima, C Baptista, M Torres da Silva, Patrícia Abreu, L Oliveira Martins, "Monitoring Media Pluralism in The Digital Era: Portugal (Media Pluralism Monitor 2023, European University Institute) Available at https://cadmus.eui.eu/bitstream/handle/1814/75734/portugal_results_mpm_2023_cmpf.pdf?sequence=1&isAllowed=y.

24 F Correia, C Martins, "Media Landscapes - Expert Analysis of the State of Media: Portugal (2019) Available at <https://medialandscapes.org/country/portugal>.

25 L Bonixie, 'A territorialização da informação: uma análise do jornalismo nas rádios locais portuguesas' (2015) *Novos Olhares*, 4(1), 67-80 <https://doi.org/10.11606/issn.2238-7714.no.2015.102239>

The lack of human resources in newsrooms is a reality in the local and regional press. This has been noticed in a report from the media authority (ERC) then in 2010²⁶ but continues to be a problem in the country: about 25% of the local and regional press report a lack of journalists and more than 70% of them employ part time journalists.²⁷ The low salaries earned and the lack of human resources are thus the main problems faced by local journalists, whether in radio or print.

There is no concrete data regarding the working conditions of local journalists working on a freelance basis. In general terms, journalists working freelance receive a fee for each job done, this amount is usually low; in addition, they do not have a work schedule. These are the general conditions of freelance journalists; they are not specific to local journalism, but it is possible to assume that they are also applied to this reality.

Attacks against the physical integrity of local journalists are not very frequent, although it cannot be said that they are non-existent. Some cases, in small numbers, have been reported and occur mainly to journalists who cover sports (football in particular). With regard to SLAPPs, between 2010 and 2022, there were 9 cases in Portugal (less than one per year), according to the recent report of the Coalition against SLAPPs in Europe (2023).²⁸ The existence of specific laws for the media sector, and the fact that freedom of the press is enshrined in the Portuguese Constitution, contribute to the low number of cases.

Editorial independence - Low risk (31%)

The Television Law (Law No. 27/2007) and the Radio Law (Law No. 54/2010) prohibit parties and politicians from exercising or financing, directly or indirectly, activities on these platforms. At the same time, the Transparency Law (Law No. 78/2015) obliges media companies to transmit to the ERC detailed information on ownership, financial data (including relevant customers and liability holders), corporate body holders, and corporate governance reports. There are, however, some cases of public knowledge in which candidates for local political office own media registered with the ERC.²⁹

State subsidisation is properly regulated³⁰, and no concerning issue is found with regards to its distribution. State subsidies consist of postage paid to local and regional press, as well as a set of funds available to companies managed by the Regional Development Coordination Commissions (CCDRs). In the last call for state Incentives for Regional and Local Media, which took place in 2022, 27 local and regional media outlets were granted support, divided into four types: digital development, technological modernisation, literacy and accessibility, with a total value of €395,214.70.

State advertising is also efficiently regulated.³¹ In 2020, in connection with the pandemic, a package of 15 million euros was exceptionally allocated in the form of advance purchase of institutional advertising. Of this amount, two million euro were allocated to regional publications and 1.7 million to regional/local radio stations.³² However, the government resolution did not identify which local and regional organs receive the approximately 3.7 million euro, determining only how the amount is distributed according to their frequency of publication.³³

26 ERC - Entidade Reguladora para a Comunicação Social, 'Imprensa Local e Regional em Portugal' (Report 2010) p. 25. Available at <https://www.erc.pt/documentos/ERImprensaLocalRegionalfinal.pdf>.

27 PA Leitão Monteiro, 'Imprensa regional: Globalização, localização e jornais de proximidade em Lisboa (2016) Master Dissertation, Universidade Autónoma de Lisboa. Available at <https://repositorio.ual.pt/bitstream/11144/2803/3/Disserta%C3%A7%C3%A3o%20PAULO%20vers%C3%A3o%20final%20para%20reposit%C3%B3rio%20da%20UAL.pdf>.

28 Coalition Against Slapps in Europe - CASE, "SLAPPs: Increasingly Threatening Democracy in Europe" (Report 2023, prepared by The Daphne Caruana Galizia Foundation on behalf of the Coalition Against SLAPPs in Europe, and published in August 2023, 2nd edition). Available at <https://www.the-case.eu/latest/how-slapps-increasingly-threaten-democracy-in-europe-new-case-report/>.

29 For example, there are some cases in which politicians were shareholders of a regional newspaper, like the former prime minister José Sócrates and the newspaper *Gazeta do Interior*. Sometimes former local journalists apply for municipal positions and use their credibility as former journalists.

30 According to Article 36 of Decree-Law n.º 23/2015, the entities competent for the allocation of incentives must submit a report to parliament containing: the identification of the beneficiaries, the total amount of support allocated, the levels of implementation of the incentive scheme, the degree of compliance of the projects supported and the impact of the support.

31 The transparency rules to which state institutional advertising campaigns are subject, as well as the rules that apply to their distribution through local and regional media are found in Law no. 95/2015, of August 17.

32 Obercom, 'Apoio financeiro aos media durante o período pandémico e análise ao estado do mercado publicitário 2019-2020' (Report, 2021) Available at https://obercom.pt/wp-content/uploads/2021/05/Apoio_media-2020_final.pdf.

33 Conselho de Ministros, Resolução n.º 38-B/2020, de 19 de maio - Presidência do Conselho de Ministros, 2020, Available at <https://diariodarepublica.pt/dr/detalhe/resolucao-conselho-ministros/38-b-2020-134021996>

According to Article 38 of the Constitution of the Portuguese Republic, the state assures the freedom and independence of the media from political and economic power. The Journalist Statute and the Code of Ethics of Journalism prescribe important provisions against commercial interference. The Code of Conduct for Advertising Self-Regulation in Advertising and Other Forms of Commercial Communication also presents relevant principles. The non-existence of proceedings brought by the Deontological Council of the Journalists Union appears to show that local journalists comply with the principles of the Code of Ethics of Journalism.

However, sometimes local news media are indirectly pressured by commercial entities, municipalities or sources because of their close ties. Moreover, other sources of concern have been identified, such as: the participation of politicians in the opinion spaces in newspapers, radio and television; measures to prevent newspapers from accessing public documents (as the former minister of infrastructures, João Galamba, did in June 2023 as a way to deny access to 105 documents by national newspaper *Público*); refusals to provide information to journalists (as happened in April 2023, when the municipality of Idanha-a-Nova refused to provide information to a journalist about a project of municipal interest; or defamation (for example, the president of Oporto City called a journalist a "perfect idiot", in September 2022). The above examples can be found in the online platform *Artigo 37*, reporting restrictions to freedom of information in Portugal.

The ERC regulates the entire media sector (TV, radio, press and online), including the Azores and Madeira. The ERC is a legal person governed by public law, with financial and administrative autonomy. It has independence regarding the exercise of its functions and is responsible to the Assembly of the Republic. The Commission of the Journalists' Professional Card and the Union of Journalists (with headquarters in Lisbon and delegations in Madeira and the north), do not have any authority over the media. The ERC and the Commission of the Journalists' Professional Card have no local branches.

Portuguese PSM (RTP, Portuguese Radio and Television) has 9 local branches, besides the headquarters in Lisbon: Oporto, Madeira and the Azores (function as national emission centres); Viseu, Vila Real and Bragança (in the north of Portugal); Coimbra (central region); Évora and Faro (the south of Portugal). These local branches do not have editorial and financial autonomy, except Madeira and the Azores. Regulatory safeguards exist and are generally effective in preventing governmental or other forms of political influence.

Problems are instead detected in terms of content diversity, as most local media cover the same subjects, usually linked to the cultural and associative agendas of the municipalities. Even covering different sections, the tone and the actors are usually identical.

Social inclusiveness - High risk (61%)

The reason for such high risk for this indicator is related to the representation of minority groups in both PSM and private media, the engagement of local media outlets with their audience and the lack of prominent media outlets that target marginalised groups.

PSM offers news and information to minority and marginalised communities, mainly news segments and some Portuguese shows: television programmes with Portuguese sign language; Teletext subtitling of programmes spoken in Portuguese; audio description and symbols used in programmes to facilitate accessibility; vocalisation and a version of Teletext RTP in text mode, accessible to screen reader software used by blind or visually impaired people. Regarding immigrants, PSM provides two channels dedicated to some segments: RTP International and RTP Africa.³⁴

When considering foreign minority languages, there is one single interesting experience developed by the local Lisbon newspaper, *Mensagem*³⁵, of journalism in Creole, within the *Newspectrum* project, in partnership with the blog Lisboa Criola. The texts are written by a journalist of Guinean origin and published in Creole from Guinea-Bissau and Cape Verde. There is also an international section with pieces available

34 See Concession Contract for Public Service Broadcasting between the Portuguese State and RTP (Rádio e Televisão de Portugal S.A.) Available at <https://media.rtp.pt/empresa/informacao/contrato-de-concessao-publica-radio-etelevisao/>. and <https://www.erc.pt/download/YToyOntzOjg6ImZpY2hlaXJvJltzOjM5OjIjZWRpYS9kZWNPc29lcy9vYmplY3RvX29mZmxpbmUvODYyOS5wZGZyO3M6NjoidGI0dWxvJltzOjI5OjIjZkZwXpYmVvYWVhby1lcmMyMDlyMjYxLW91dC10diI7fQ==/deliberacao-erc2022261-out-tv>.

35 *Mensagem de Lisboa* (Local newspaper), <https://amensagem.pt/crioulo/>

in English. Portugal does not have prominent media addressing minority groups, only niche experiences such as *Afrolink*³⁶, *Revista Gerador*³⁷, *Lisboa Criola*³⁸, *Buala*³⁹, *Revista Mulher Africana*⁴⁰ and other similar micro alternative digital media focused on Afro-descendant communities.

Since 2018 the ERC has monitored the cultural diversity of news content on public television and 3 private stations: SIC, TV and CMTV. The results do not reveal significant differences between public and private media in terms of representativeness, with all channels scoring low. Still, the public channel RTP2 scores best, standing out with the highest percentage of time and programme titles for minority groups and the promotion of cultural diversity.⁴¹ However, there are relevant differences in the framework. CM TV, the private TV channel of the COFINA group, broadcasts more images promoting stereotypes and ethnic discrimination. Moreover, according to the last regulatory report from the media authority (ERC), there is a low number of programmes promoting cultural diversity and minority interests on the main public broadcasting television channel and the two leading commercial TV media (SIC and TVI).⁴²

Finally, in terms of engagement, local media do not have the financial resources, the knowledge or the means to conduct audience studies or impact studies; any relation with the academics that could partner them is scarce. Engagement with the community and participatory journalism is something that is not yet secured in local newsrooms. Communities do not see added value in journalism (especially the younger groups who are used to social media alone) and do not engage easily with journalists.^{43,44}

Best practices and open public sphere

Portuguese news media organisations are experimenting with innovative responses, regarding new formats, storytelling, data journalism and even social innovation. As mentioned, *Mensagem de Lisboa* was the first to create a section written in Creole, the second most spoken language in Lisbon. *Divergente* has carried out investigative journalism, and has already received several international awards, such as the Online Journalism Awards⁴⁵. RDP, a public radio service, launched the first report with binaural sound in 2018.

36 Afrolink, <https://afrolink.pt/sobre/>

37 Revista Gerador, <https://gerador.eu/revista/>

38 Lisboa Criola, <https://www.lisboacriola.pt>

39 Buala, <https://www.buala.org>

40 Revista Mulher Africana, <https://www.revistamulherafricana.com/OnStage.asp>

41 ERC Entidade Reguladora para a Comunicação Social, 'Relatório de Regulação 2022' (Report 2023) Available at <https://www.erc.pt/pt/estudos/relatorios-de-regulacao/relatorio-de-regulacao-/>

42 *Ibid.*, 422.

43 D Santos Silva, C Carvalho, C Reis, A Brito Guterres, '(Un)désert the News' (fieldwork 2023).

44 Interviews with C Reis (editor of Mensagem de Lisboa); C Carvalho (Director of the Mensagem de Lisboa) and A Brito Guterres (community mediator) Conducted in person on 14 November 2024.

45 See <https://awards.journalists.org/entries/for-you-portugal-i-swear/>.



Romania

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Roxana Bodea, Median Research Centre

Context

Romania stands out among European countries in its relatively low news consumption across the board, contributing to a somewhat small and resource-poor news media market.¹ What is more, local media in Romania were hit particularly hard by the 2008 economic crisis and its aftermath, meaning many local publications never recovered.² Local publications were among the first to fold or retreat into online-only editions as a result of the crisis. There are now far fewer local print publications left, and their circulation numbers are low. Discussions on the problems facing news media outlets, both national and local, are mostly limited to small circles of industry and industry-adjacent professionals—in particular journalists, NGO observers, other media professionals—rarely reaching the mainstream public sphere. When they come up, local media markets and outlets tend to be talked about as contexts where the problems observed in the news media industry or market at large are exacerbated. Thus, the crisis of local media receives relatively little mainstream attention, and when it is discussed, possible policy solutions are, at best, an afterthought.

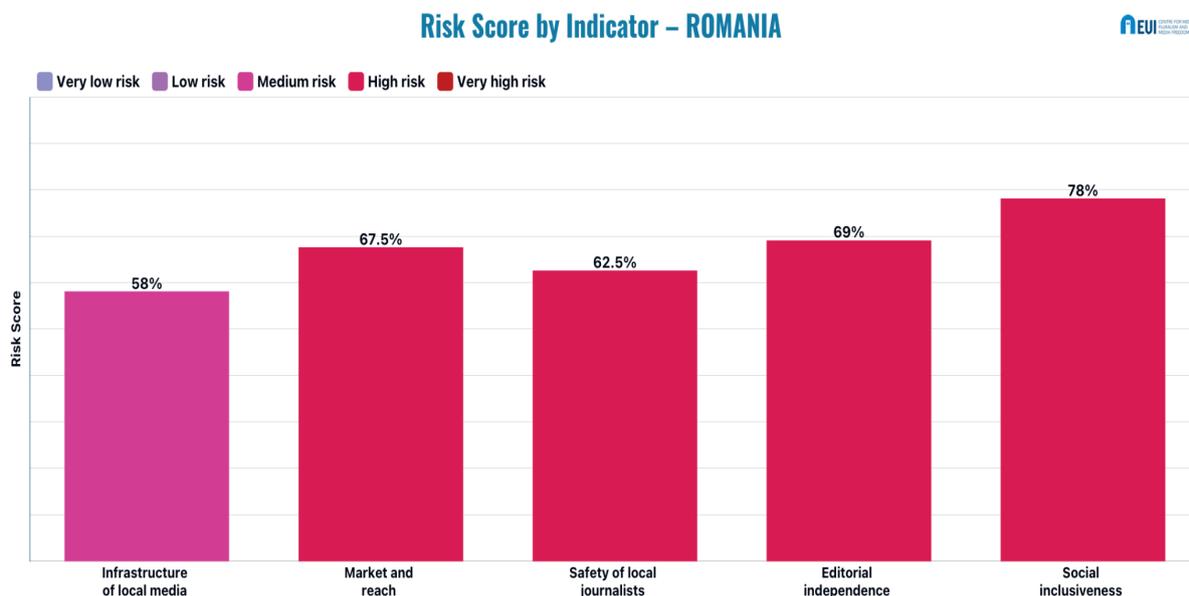
The available data suggest that online local media cannot compensate for the reduction in availability of local print news. According to our estimations, there are up to seven counties without specific online outlets focused on their area.³ Besides, the internet is not yet the main source of news for most citizens. Only around 20% of Romanians turn to the internet as a main source of news, according to Eurobarometer 92.⁴

Television and radio are still the main ways most Romanians get their news, yet it is unclear how much of the citizens' need for locally- and regionally-relevant news can be covered by these media.

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- 1 European Commission, 'Standard Eurobarometer 94 - Winter 2020-2021 - Media in use in the European Union – Report', 2022, pp. 16-19, <https://europa.eu/eurobarometer/surveys/detail/2355> (accessed 24 May 2022). R. Bodea and M. Popescu, 'Journalistic and Business Strategies of an Investigative Journalism Media Organization in Romania', Presentation at the World Media Economics and Management Conference, Cape Town, South Africa, 6-9 May 2018. R. Bodea, 'Turmoil and Transformation. A Comparative Study of Newspaper Market Adjustment (2008-2013)', M.A. Thesis, Faculty of Economic and Social Sciences & Solvay Business School, Communication Studies, Vrije Universiteit Brussel, 2018.
 - 2 M. Popescu, R. Bodea and R. Toma. 'Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor 2020 in the European Union, Albania and Turkey in the years 2018-2019. Country report : Romania', 2020, <https://cadmus.eui.eu/handle/1814/67815>. M. Popescu, R. Bodea, A. Marincea and R. Toma. 'The Online News Media Landscape in Romania', 2019.
 - 3 Pooling data from multiple sources, a total of 99 regional or local online news outlets were identified, covering 32 counties of the 40 counties of Romania. For 8 counties, no print or online titles were identified, in that particular county (Bistrita Nasaud, Buzau, Caras-Severin, Dambovita, Giurgiu, Gorj, Harghita and Hunedoara). Harghita can be considered to benefit from coverage by a regional online publication in Hungarian focused on Harghita and Covasna County (also dubbed "Szeklerland" sometimes). Sources: The Study of Online Audiences and Traffic (SATI), produced by BRAT, Similarweb and Media Cloud.
 - 4 European Commission. 'Standard Eurobarometer 92 - Autumn 2019 - Media use in the European Union', 2020, : <https://data.europa.eu/doi/10.2775/80086>

Eight in ten Romanians name TV as their number one or two source of news, and three in ten name radio.⁵ In addition to the public regional stations, there are 14 television stations with local reach, based in cities, as well as a number of private regional TV stations,⁶ and almost all counties have at least one local radio station.⁷ Yet it is not possible to ascertain how much—if any—news content is delivered.

Lack of data is a significant problem for understanding the Romanian local media landscape. In many cases there is no data whatsoever, and in others, data is not aggregated, only available on request, not updated regularly, or posted in formats that are not machine readable.



Granularity of infrastructure of local media - Medium risk (58%)

The overall risk score for the indicator on the granularity of infrastructure of local media is 58% (medium risk). All other areas have an even higher risk score, which illustrates the dire state of local media in Romania.

Rural areas are the most news-deprived, due to the limited number of locally—as opposed to regionally—relevant news outlets available, leading to a very high risk rating on this variable. Urban areas are better served, with more TVs and radio stations.

Public service media (PSM) have the most comprehensive reach. As mentioned in the previous section, TV is the number one or two source of news for most Romanians,⁸ and there are five regional PSM TV stations, broadcasting some regionally relevant news in 10-30 minute slots: *TVR Mures* (based in Târgu Mureș, covering the North West); *TVR Craiova* (based in Craiova, covering the South-West); *TVR Iași* (based in Iași, covering the North East); *TVR Cluj* (Cluj-Napoca-based, covering the Central Region); and *TVR Timișoara* (based in Timișoara, Western Region). Yet public television stations have a small audience: TVR1, the main television station of the public broadcaster, ranked 14 in prime time in 2023, per the

5 European Commission, 2020.

6 Consiliul Național al Audiovizualului. 'LICENȚE AUDIOVIZUALE pentru difuzarea serviciilor de programe de televiziune prin rețele de comunicații electronice (inclusiv prin satelit) și în sistem digital terestru [AUDIOVISUAL LICENSES for the broadcasting of television programme services via ...]'. 2023, https://www.cna.ro/IMG/pdf/Licente_audiovizuale_pentru_difuzarea_serviciilor_de_programeTV_SITE.pdf. Consiliul Național al Audiovizualului. 'Situatia Numarului De Licente / Societate - Televiziune [Status of License Number / Company - Television]', 2023, https://www.cna.ro/IMG/pdf/Situatia_numarului_de_licente_TV_SITE-3.pdf.

7 Consiliul Național al Audiovizualului. 'LICENȚE AUDIOVIZUALE pentru difuzarea terestră și prin rețele de comunicații electronice a serviciilor de programe de radiodifuziune [AUDIOVISUAL LICENSES for terrestrial and electronic communications network broadcasting of radio programme services]'. 2023. https://www.cna.ro/IMG/pdf/Licente_audiovizuale_pentru_difuzarea_serviciilor_de_programeRadio_SITE.pdf (accessed 1 October 2023). Consiliul Național al Audiovizualului. 'Situatia Numarului De Licente / Societate - Radiodifuziune [Status of the Number of Licenses / Company - Broadcasting]', 2023, https://www.cna.ro/IMG/pdf/Situatia_numarului_de_licente_Radio_SITE-3.pdf.

8 European Commission, 2020.

latest data.⁹ There are also nine regional public radio stations, covering the entire country,¹⁰ and the public news agency had an average of 37 local correspondents in the country, over the past five years.¹¹

The number of print publications has declined in the past 15 years. The National Audience Study (*Studiul National de Audienta - SNA*), ordered by the Romanian Transmedia Audit Bureau (BRAT), an industry group,¹² audited 54 print local and regional publications in 2008. By 2018 that number had gone down to 12, and in 2023, it covered only two local publications (*Crisana* and *Bihoreanul*).¹³

There are now only about a dozen daily or weekly local news print publications participating in BRAT's print audit. Most of these are found in the Central and Western part of the country.¹⁴ They have very small circulation numbers: mean circulation for this group was 2,800 in July-September 2023, per BRAT data.¹⁵

Internet penetration is not universal yet, and rural areas have a higher share of households without internet and of persons with fewer digital skills. In 2022, 26% of rural households had no internet connection, while only 11% of urban households lacked internet.¹⁶ In urban areas there are more local television and radio stations (although it is unclear how much news content they produce).¹⁷ Additionally, there are few local/regional print titles left, and their circulation is very low, as discussed in the introduction.

One of the major national outlets, *Adevărul*, has an established section on local news of significant size. *Adevarul.ro* was sixth among Romanian news websites in December 2023, with 4.7 million unique users, according to SATI. It has a network of local collaborators who publish almost daily, covering 39 counties, including the capital city.

Market and reach - High risk (67.5%)

Revenue trends are difficult to gauge due to lack of aggregate data. For companies owning the local print press, the trend appears to be downward.¹⁸ Of the online local media, four out of the five top performers are owned by the same companies owning the print publications and the fifth may not be representative

9 P. Obae, 'AUDIENȚE TV 2023 Prime-Time. Câți români s-au uitat seara la TV? Pro TV rămâne cel mai urmărit și singurul peste milion. Antena 1, singurul care crește și urcă peste Kanal D în țară. Surprizele FilmCafe și Cinemaron', 2024 <https://www.paginamedia.ro/audiente-tv/audiente-anuale/audiente-tv-2023-prime-time-seara-top-televiziuni-21449604>.

10 The national radio (Radio Romania) has nine regional branches. They are based in the following cities: Bucharest, Brasov (Brasov county), Cluj-Napoca, Constanta, Craiova, Iasi, Resita, Targu-Mures and Timișoara. It is however not possible to report on how much news content rather than music and entertainment they produce.

11 AGERPRES headquarters are based in eight cities: Botoșani, Cluj, Gorj, Harghita, Mureș, Olt, Vaslui and Bistrița-Năsăud. In the last five years it had 37 local "special" correspondents on average (with a high of 40 in 2019 and a low of 35 in 2020 and 2022), all of whom work full time (all but 4 work exclusively with the agency). All correspondents are based locally (Source: Freedom of Information Act request response).

12 The Romanian Transmedia Audit Bureau is an industry group of media publishers, advertising companies, advertising clients and other organisations connected to the business.

13 M, Popescu, R. Bodea, A. Marincea and R. Toma, 2019. Biroul Roman de Audit Transmedia. 'Rezultate de audienta SNA FOCUS [SNA FOCUS audience results]', 2023, <https://www.brat.ro/sna/livrare/sna-national-iun20-iun23>.

14 Bihor: Jurnal Bihorean, Bihari Naplo, Bihoreanul, Crisana; Harghita: Hargita Népe; Covasna: Observator de Covasna; Arad: Jurnal Aradean; Mures: Zi de Zi; Satu Mare: Gazeta de Nord Vest.

15 The highest circulation in July-September 2023 was 8,192 for Harghita Nepe, followed by 6,032 for Jurnal Aradean and the lowest 600 for Gazeta de Nord Vest and (preceded by OBServator de Covasna, with 892). Biroul Român de Audit Transmedia. 'Cifre de difuzare iulie septembrie 2023 [Circulation numbers July September 2023]'. 2024, <https://www.brat.ro/audit-tiraje/cifre-de-difuzare> (accessed 9 January 2024).

16 Institutul Național de Statistică. 'În anul 2022, ponderea gospodăriilor care au acces la rețeaua de internet de acasă a fost de 82,1%' [In 2022, the share of households with access to Internet at home was 82.1%], 2023, https://insse.ro/cms/sites/default/files/com_presa/com_pdf/tic_r2022.pdf (accessed 1 October 2023).

17 There are in fact 38 counties that have at least one radio company that holds only one licence (i.e. a licence for only one locality). Most of these licences are issued for broadcasting in urban localities, not rural ones.

18 The remaining print outlets are owned by a total of five companies. Inform Media Press SRL owns Jurnal Aradean, Bihari Naplo and Jurnal Bihorean. Szekely Hirmondo is owned by Profiton SRL; Observator de Covasna by Comparty SRL; and Crișana by Anotimp Casa de Presa si Editura SA. Between 2017 and 2022, the total revenue for these five (adjusted for inflation) went down by 90%. Ministerul Finanțelor. 'Agenți economici și instituții publice - date de identificare, informații fiscale, bilanțuri [Economic agents and public institutions - identification data, fiscal information, balance sheets]', 2023, [://mfinanze.gov.ro/domenii/informatii-contribuabili/persoane-juridice/info-pj-selectie-dupa-cui](https://mfinanze.gov.ro/domenii/informatii-contribuabili/persoane-juridice/info-pj-selectie-dupa-cui).

at all (but it had an extraordinary rise in revenue in recent years).¹⁹ The revenue evolution of the top radio and TV stations in the past five years involves wild variation, with no clear trend.

There is little information about the willingness of Romanian audiences to pay for news, but the existing information suggests a low willingness to do so. Arguably, both the available statistics and the lack of higher quality data justify the very high risk rating in this area. Survey data on willingness to pay for news in general offers a sense of a general trend that may apply to local news as well. In a 2023 online survey (n=2,017) conducted for the Reuters Digital News Report, 16% of respondents reported a willingness to pay for online news.²⁰ In a 2022 Flash Eurobarometer survey (n=2,110), of the survey participants who reported having read online news in the past year, only 20% reported having accessed any paid content (20% did not know and 60% said they only accessed free content).²¹

The number of local TV stations may be going down, if the number of local licences issued by the national regulator is a good indicator. It is however also possible that existing outlets narrowed their broadcasting range.²² The number of local radio licences has registered a very small increase, but it is not clear if the number of outlets increased, or the range of the existing ones did.²³

The print paper distribution chain has collapsed in the past few decades, especially after the 2008-2009 crisis. Local paper distribution and national publication distribution outside of the capital were particularly affected by the bankruptcy of printers as well as distribution companies, thus this variable was assessed as holding a very high risk score. Print distribution, historically done mainly through newspaper stands and—to a lesser extent—via mail distribution of print subscriptions, is still a challenge²⁴. In the years following the economic crisis, both the number of newsstands and of distribution companies halved. While in 2010 there were 6,500 newspaper kiosks in the country, by 2017 that number had gone down to 3,000.²⁵ Half of the distribution companies had reportedly gone bankrupt, and many others were in dire financial situations.²⁶

As written in the Media Pluralism Monitor country reports, in Romania there is essentially no support and no serious consideration given to supporting through subsidies the production of high-quality information on public interest affairs.²⁷ There are no direct subsidies, and the only indirect subsidy is a reduced Value Added Tax (VAT) rate for print, which has almost no impact on the media sector as a whole due to the low number of print outlets remaining in the country. This VAT reduction is automatically applied. As for state advertising, it is worth underlining that the aims and therefore the allocation criteria of state advertising projects differ significantly from state subsidies. Whereas state subsidies aim to support the production of (certain) kinds of media content, state advertising campaigns aim to get a particular message out to

19 Four of the top five online local news websites are owned by companies covered under print, above (overall loss in past few years). The remaining company, Prima Press SRL, registered a 3,000% growth in revenue between 2017 and 2022, but this is probably not representative of the online local news media landscape, considering this is a Hungarian language publication and, according to press reports, most of the funding of Prima Press came through projects they applied for abroad. Biroul Roman de Audit Transmedia. 'Rezultate trafic proprietati online [Online property traffic results]', 2023: <https://www.brat.ro/sati/rezultate/type/site/page/1/c/all>.

20 N. Newman, R. Fletcher, K. Eddy, C. T. Robertson and R. Kleis Nielsen. 'Reuters Institute Digital News Report 2023'. 2023, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf (accessed 1 October 2023).

21 European Commission. 'Media & News Survey 2022', 2022, <https://europa.eu/eurobarometer/surveys/detail/2832>.

22 One has to use this proxy because no aggregate numbers were provided. In 2019, there were 145 active local television licences and 52 regional ones (for private companies). The national TV company (TVR) had 5 regional TV channels. Four years later, in 2022, there were 94 active local TV licences and 56 regional ones (for private companies), and TVR had the same number of TV channels. Thus it appears that the number of outlets decreased, or existing outlets narrowed their broadcasting range. Consiliul Național al Audiovizualului. 'Raportul de activitate al Consiliului Național al Audiovizualului pe anul 2022 [The activity report of the National Broadcasting Council for 2022]', 2022, https://www.cna.ro/IMG/pdf/1_CNA_Raport_de_activitate_pe_anul_2022.pdf.

23 In 2019, there were 562 active local radio licences and 8 regional licences, issued to private companies. There were also 13 regional and one local licences issued for the National Radio Company (SRR). Four years later, in 2022, there were 565 active local licences and 15 regional licences, issued to private companies, and 12 regional and one local licence for SRR. Thus, it is possible that the number of outlets increased but it could also be that existing outlets expanded their range of localities.

24 Lupu, 2020, pp. 13, 20.

25 C. Tolontan. 'Sentinta. Un judecător i-a spus lui Daniel Băluță că ocupația sa ca primar nu e „încărcarea rolului instanțelor de judecată cu cereri lipsite de teme” contra jurnaliștilor' [Sentence. A judge told Daniel Baluta that his occupation as a mayor is not "to fill up the schedule of courts with baseless requests" against journalists]. *Libertatea*, 2023, <https://www.libertatea.ro/stiri/sentinta-judecator-spus-daniel-baluta-ocupatia-sa-ca-primar-nu-e-incarcarea-rolului-instantelor-de-judecata-cu-cereri-lipsite-de-temei-contra-jurnalistilor-4531663>.

26 Obae, 2016.

27 Toma et al., 2023. Popescu et al., 2021.

the highest share of people possible out of the target audience. Consequently, allocation criteria can and should be different.²⁸ A few private grant schemes are available, but none destined for local media specifically, so local media competes with national media.²⁹

Safety of local journalists - High risk (62.5%)

The assessment of working conditions is based on the (limited) information it is available about conditions for journalists in Romania in general. Salaries in the media—according to the limited data it was possible to gather—are quite low.³⁰ Moreover, several media outlets frequently do not pay salaries on time and sometimes for several months in a row. Many people who work in this field also have the kind of short-term, freelance-type contracts that do not come with medical insurance and social security by default and that offer less protection from sudden or arbitrary dismissal. Some of the journalists who do have classic labour contracts report that they are expected to work longer than the hours written into their contracts. For example they may have a half-time contract but be expected to work more than double than that. According to some research, long unpaid internships are common, and some young journalists see accepting precarious (or unpaid) labour as necessary to get one's foot in the door and earn experience.³¹

There are occasional attacks or threats against journalists, but there is no evidence of an increase in the number of cases. In 2022, a public radio journalist was the target of a public threat by a Hungarian far-right politician, a statement condemned by multiple political figures, including the Democratic Union of Hungarians in Romania (UDMR). The same year, the Directorate for Investigating Organised Crime and Terrorism raided the house of a local journalist who had been critical of the Braila police commissioner, in a raid that was ruled unjustified by a local court. In 2023, this research so far identified no attacks and one threat against local journalists.³²

28 For example, it makes sense for a state advertising campaign to fund media that are very popular among the target audience, whereas depending on the aim of a particular subsidy it may not (and probably does not) make sense for it to go to the most popular / lucrative outlets. Funds disbursed by the government in the second half of 2020 as public campaigns in the fight against COVID-19 were clearly advertised and transparently allocated. Some criticised this policy on the grounds that money went to commercial broadcasters, tabloid media, and even media spreading fake news, instead of supporting quality journalism. Although the observations were somewhat accurate, the critique was based on a misunderstanding of the principles of state advertisement and conflated it with state support for public interest news media. Even press reports acknowledge that the size of the audience was the main criterion of allocation. In the months after the ordinance 63/2020 was approved (modified by ordinance 86/2020 and by law 164/2020 which increased the total amount of the advertising budget from 40 million euros to 50 million and expanded the implementation period from end of October to end of December 2020) the biggest TV stations in the country attracted the biggest budgets, as did the biggest radio stations.

29 The Romania-based Foundation for the Development of Civil Society (FDSC) has some grant programmes (Civic Innovation Fund, e.g.) where media organisations can be eligible for project-based funding. Some smaller non-profit national media have used FDSC funding in the past few years (Recorder, Funky Citizens' Buletin de Bucuresti project); The Google Digital News Innovation Fund has awarded EUR 1,8 million to 16 entities in Romania, but none of them are local, except for Funky Citizens' Buletin de Bucuresti (a recent Bucharest-focused online outlet). The Romanian American Foundation awarded the niche narrative journalism (national) print and online magazine *Decat o Revista* (now defunct) a \$86,700 grant for May 2022 - April 2023; \$432,417 for 2019-2021.

30 According to data from Paylab.ro, a website comparing salaries from different branches, the range is between the equivalent of 525 EUR and 1,130 EUR (estimate based on June 2023 exchange rate). Cristian Lupsa, the editor of niche magazine and website *Decat o Revista*, reported in early 2019 that most of the people on his 30-some writing staff make between 410 EUR and 820 EUR, and that giving them all labour contracts (as opposed to collaborator contracts) was a significant financial effort for the organisation (EUR figures based on 30 April 2019 exchange rate). In early 2020, he was reporting that he had managed to raise salaries somewhat, such that the lowest salary band (juniors) in the organisation began at 512 EUR (at the time, he also reported that his most junior person was making 615 EUR) (EUR estimations based on 27 January 2020 exchange rate). Lupsa's publication closed in 2022 citing insufficient revenue to maintain operations.

31 R. Surugiu, 'Labor Conditions of Young Journalists in Romania: A Qualitative Research'. *Procedia - Social and Behavioral Sciences*, vol. 81, pp. 157-161, 2013; P. Bajomi-Lázár, 'A country report for the ERC-funded project on Media and Democracy in Central and Eastern Europe', 2011; H. Örnebring, 'Anything you can do, I can do better? Professional journalists on citizen journalism in six European countries'. *International Communication Gazette*, vol. 75, no. 1, 2013. <https://doi.org/10.1177/1748048512461761>.

32 Journalists from local outlet *Incomod* allegedly received online threats that are being investigated by local authorities: Incomod. 'Un fost polițist a amenințat jurnaliștii ziarului Incomod care au scris despre mafia gunoaielor din Prahova: "Vezi că te arzi"' [A former policeman threatened journalists from Incomod newspaper that wrote about the trash mafia in Prahova: "Be careful or you'll get burned"], 2023, <https://www.ziarulincomod.ro/un-fost-politist-a-amenintat-jurnalistii-ziarului-incomod-care-au-scris-despre-mafia-gunoaielor-din-prahova-vezi-ca-te-arzi/>.

Another very high risk factor refers to journalists' organisations, or rather, the lack thereof. There are no journalists' organisations of a significant size to speak of in Romania at the moment, despite some (relatively feeble) attempts in the past.³³

The Association of Media Professionals (APCC) is the only active and local membership-based organisation for journalists. It currently has 52 voting members according to its website (apcc.ro).

The information indicates that SLAPP cases occur occasionally, but it is worth stressing the lack of systematically collected and comprehensive data on this. There is no anti-SLAPP legislation at the moment. There are some cases where it is relatively plain to see that a high-profile figure is attempting to use the avenues provided by the courts and other Romanian institutions to inconvenience or intimidate journalists. For example, Daniel Băluță, the mayor of Bucharest's Sector 4, has filed more than 20 court cases against journalists (mainly from *Libertatea*) and was critiqued for baseless litigiousness by a local judge in 2023.³⁴ Finally, the public likely hears about only a minority of the cases of lawsuits against journalistic outlets.

Editorial independence - High risk (69%)

There are, arguably, significant shortcomings in the regulation. The Audiovisual Law regulating the ownership regime for radio and television media does not contain any reference to conflict of interests between media owners and political parties or partisan groups. There is no specific legislation conceived for the written press or digital media ownership, these being regulated only by the general law on commercial enterprises, which does not include such stipulations.

Previous research by civil society organisations has found complex "entanglements in the management and ownership of local television stations", contributing to a high risk assessment in this variable.³⁵

Other organisations, journalists and media observers have reported that local media are very vulnerable to political pressure that is exerted through means other than ownership, and some have characterised some local media as outright politically controlled.³⁶ For instance, journalists and former journalists interviewed by other organisations in the past and some experts have characterised local outlets as particularly vulnerable to political pressure because much of their advertising money comes from local authorities that are willing to disburse or withhold money on political grounds.³⁷ Additionally, the line between advertising and editorial content is often blurred, as contracts between local institutions and outlets appear to include not just the purchase of advertising space but also of featured interviews, appearances etc.³⁸

33 There is an organisation that mainly seeks to defend the interests of journalists working for public radio and public television (MediaSind). R. Toma, M. Popescu and R. Bodea. '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'. 2023, https://cadmus.eui.eu/bitstream/handle/1814/75735/romania_results_mpm_2023_cmpf.pdf?sequence=1&isAllowed=y. M. Popescu, R. Toma and R. Bodea. '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 2021. Country Report Romania'. 2022, <https://cadmus.eui.eu/bitstream/handle/1814/74702/MPM2022-Romania-EN.pdf?sequence=1&isAllowed=y>.

34 Tolontan, 2023; C. Radu, R. Luțac and C. Tolontan. 'Anul 2021, încheiat cu trei procese pierdute de primarul PSD Daniel Băluță, pe 17, 20 și 22 decembrie, în fața jurnaliștilor de investigație [The year 2021 ended with three trials lost by PSD Mayor Daniel Băluță, on December 17, 20 and 22, in front of investigative journalists]', *Libertatea*, 2021, <https://www.libertatea.ro/stiri/anul-se-incheie-cu-trei-proc-ese-pierdute-de-primarul-psd-daniel-baluta-pe-20-21-si-23-decembrie-in-fata-jurnalistilor-deinvestigatie-3907434> (accessed 1 October 2023):

35 A 2014 Active Watch report on the state of local televisions concluded that "[p]olitical or economic entanglements in the management and ownership of local television stations are often so complex that you cannot always clearly define the political colour of a television station. In addition, in many cases the data is missing. But according to the data we were able to collect, there are worryingly many cases where local television is a weapon of political and economic warfare sponsored by public money, directly or indirectly. Thus, almost half of the 56 televisions included in the research are directly or indirectly influenced by politicians". M. Popa, A. Mogoș, M. Pavelescu and Ș. Căndea. 'Harta politică a televiziunilor locale [The political map of local televisions]', *Active Watch*, 2014, https://activewatch.ro/documents/119/Harta_politica_a_televiziunilor_localeFINE.pdf. C. Lupu. 'Starea mass-media în România. 2020 [State of the Mass Media in Romania. 2020]'.

36 A 2020 report by the Centre for Independent Journalism, for example, based on interviews with dozens of journalists from the national and local level, asserted that "[t]he lack of money from the public makes the press remain captive to local interests, which arbitrarily finance media products, and the citizen's interest remains, most of the time, unrepresented" (Lupu, 2020, p. 19). Multiple journalists interviewed talked about political pressures, including at the local level, sometimes exerted via financial support through advertising money (Lupu, 2020, p. 27, 43, 51). Popa et al., 2014. C. Lupu. 'Starea mass-media în România. 2020 [State of the Mass Media in Romania. 2020]'. 2020 and 2021, https://cji.ro/wp-content/uploads/2020/04/STUDIU-PRESA-2020_roBT-rev-01.pdf and <https://cji.ro/wp-content/uploads/2021/06/Jurnalismul-in-2021.-O-cursa-cu-obstacole-si-cu-tof-mai-putini-castigatori-raport.pdf>.

37 Lupu, 2020, p. 51; Avădani and Lupu, 2015, p.7, 12, 15; Popa et al., 2014, p. 15. I. Marin. 'Presa locală, cumpărată cu bani publici: milioane de euro pe ode, emisiuni aranjate și felicitări [The local press, bought with public money: millions of euros for odes, arranged broadcasts and congratulations]'. *Recorder*. 2018, <https://recorder.ro/presa-locala-cumparata-cu-bani-publici-milioane-de-euro-pe-ode-emisiuni-aranjate-si-felicitari/>.

38 Lupu, 2021, pp. 23-24.

There are neither legal nor self-regulatory mechanisms in place to protect journalists and journalistic outlets from commercial pressures, in the form of arbitrary appointments or dismissals or threats thereof³⁹ or undue pressures to alter content / editorial policy.⁴⁰ Very few outlets have even adopted an ethical code, and some cases of abuse have been documented even in such places.⁴¹ Journalists and media observers also report that local media are under particularly high pressure due to the scarcity of funds, including the scarcity of advertisers.⁴²

In recent years, leaked documents and numerous anonymous sources have also revealed that many national news media have published political advertising content without signalling it as such, likely leaving their readers with the impression that they are looking at journalistic content.⁴³ Although there is no specific information about this occurring at the local level, the phenomenon speaks to the weakness of journalistic norms as well as to the impact of funding scarcity that local media experience just as much—if not more—than national media.

The media authority CNA (*Consiliul National Audiovizual* - National Audiovisual Council) has remit only over audio-visual media. As such, its remit does include local/regional televisions and radio. Decisions to issue penalties are based on the analysis of the staff controllers/inspectors but made by the same members of the Council that decide on penalties related to national broadcasters. Until evidence to the contrary is available one can therefore extrapolate from assessments of the overall decisional practice of the CNA: there is no evidence of systematic bias but in the past there were some cases where occasional partisan bias may have been at play on the part of some members.⁴⁴

As discussed in the section dedicated to the granularity of local media's infrastructure, public service television and radio have local branches, and the national press agency has local correspondents. No data is found on the degree of political independence displayed by the local coverage of public media. Moreover, there is a lack of systematic and professional analysis of the content diversity of local media, although given the limited options in terms of the number of outlets producing locally-relevant news content in many counties, content diversity itself is likely to be low. The lack of data on these aspects in itself constitutes a high risk.

Social inclusiveness - High risk (78%)

Lack of data posed many obstacles to the assessment of social inclusiveness in local and community media. Still, the conclusion is that this indicator has the highest risk score.

The available information suggests that the needs of many groups may be insufficiently met. For instance, public media broadcast very little news content in minority languages: the national television channel (TVR1) broadcasts its television news programme only in Romanian, and only one of its regional branches provides some (shorter) news shows in Hungarian.⁴⁵ *Radio România Actualități*, the national

39 Toma et al., 2023, p. 9.

40 Toma et al., 2023, p. 18-19.

41 Popescu et al., 2022, p. 15-16, 22.

42 Lupu, 2020, pp. 7-11.

43 V. Ilie, M. Voinea and C. Delcea. 'Prețul tăcerii. O investigație în contabilitatea presei de partid [The price of silence. An investigation into the accounting of party media]'. *Recorder*. 2022, <https://recorder.ro/pretul-tacerii-o-investigatie-in-contabilitatea-presei-de-partid>. C. Andrei. 'Agenția confidențială. Fost lider PNL: „Am plătit promovarea pe site-urile Antenelor, Digi24, Realitatea, B1, RTV, Hotnews” [The confidential agency. Former PNL leader: "We paid for promotion on the Antena, Digi24, Realitatea, RTV, Hotnews websites"]', *Europa Liberă România*, 2022, <https://romania.europalibera.org/a/lider-pnl-am-platit-site-urile-antene-digi24-realitatea-b1-rtv-hotnews-/32031503.html>. A. Crăițoiu. 'Recorder a publicat banii dați de PSD și PNL către unele televiziuni și site-uri, provenind dintr-o scurgere de documente [Recorder has published the money that PSD and PNL gave to certain TV channels and websites, coming from a leak]'. *Libertatea*, 2022, <https://www.libertatea.ro/stiri/recorder-a-publicat-banii-dati-de-psd-si-pnl-catre-unele-televiziuni-si-site-uri-provenind-dintr-o-scurgere-de-documente-4277301>.

44 Toma et al., 2023.

45 In January 2023, *TVR Targu Mures* had a Hungarian-language regional news broadcast at 9 am (10m), 4 pm (10m) and 5.30 pm (25m).

radio news channel, only broadcasts the news in Romanian over the airwaves, and the regional national radio stations also have little to no news in minority languages.⁴⁶ Looking at broadcasting licences awarded by the media regulator CNA, only a few private channels offer news content in minority languages.⁴⁷

There is little to no data on the coverage of minorities, especially outside of the Roma community.⁴⁸ A 2003 analysis of coverage of the Roma in the news media concluded that the media covered Roma mainly with a focus on conflicts—between the Roma and authorities—and with heavy use of negative stereotypes.⁴⁹ A 2021 study on coverage of the Roma amid the COVID-19 pandemic in Romania found that conflictual framings (still) abound and that (negative and stereotypical) presentations of the Roma and scapegoating continue to be a problem.⁵⁰

There are no media outlets specifically addressing marginalised groups in the country with news content, leading to a very high risk rating on this variable. Even women are not specifically targeted as an audience group with politics and public affairs-related content by any media of significant reach.

With regard to initiatives by local media to build audience trust, engage with the audience and the local community, this research did not identify any analyses on such efforts. This lack of data has been assessed to be high risk.

Best practices and open public sphere

Initiatives to experiment with innovative products, distribution models, reporting methods and team organisation modes are limited in number and in scope. One of the more successful examples—with a national scope in terms of subject matter—is *Dela0.ro*, founded in 2011 and currently employing a team of six, of whom four are reporters and two are editors.⁵¹ The niche narrative journalism magazine *Decat O Revista* experimented with novel products and revenue streams, such as courses and organising the “Power of Storytelling” conference for several years, but insufficient funding led to a decision to stop publication in 2023.⁵² A novel but ultimately unsuccessful example—also with a national scope—is the now-defunct *Inclusiv* initiative, which launched with a major and successful fundraising effort in 2019 but folded in 2021 without reaching its full journalistic potential.⁵³ In terms of civil society organisation-backed initiatives, a notable one that has been successful in securing some funding so far is *Buletin.de*, a project by the Bucharest-based CSO Funky Citizens. For now, *Buletin.de/Bucharest* covers news from the capital, and it has received EU funds during the COVID-19 pandemic as well as from the Google News Initiative.

46 According to our research, one of the regional radio channels has some news in minority languages, but they appear to cover only or mainly regional/local news as part of a one-hour slot that also includes music and other content (Radio Timisoara has a German slot from 7pm, a Hungarian slot from 8pm, and Serbian slot from 9pm).

47 The authors of this chapter identified one (local) news station ERD TV (registered in the county of Covana) that broadcasts news in Hungarian and no television stations broadcasting (Romanian) news in German or other minority languages. We have also identified four radio stations that provide news in Hungarian: *Plusz Radio* (registered and broadcasting in the county of Bihor), *Slager Radio* (registered and broadcasting in Sfantu Gheorghe in Covasna County), *Erdely FM* (registered and broadcasting in Miercurea Ciuc, Harghita County); *Szepeviz FM* (Miercurea Ciuc, Harghita). We found no radio stations broadcasting news in German or other minority languages. Looking at the databases for print publications and online publications signed up for monitoring by the Romanian Transmedia Audit Bureau (BRAT), we found a few news sites and print outlets in Hungarian.

48 G. Cretu. Roma Minority in Romania and its Media Representation. *Sfera Politicii*, 2014, <https://revistasferapoliticii.ro/sfera/180-181/pdf/180-181.11.Cretu.pdf>

49 Agentia de Monitorizare a Presei. 'Presa de la "Tigani" la "Romi" [The Press, from "Gypsies" to "Roma"]', 2003, <https://ro.scribd.com/doc/58171848/Imaginea-Romilor-in-TV>

50 I. Chiruta. 'The Representation of Roma in the Romanian Media During COVID-19: Performing Control Through Discursive-Performative Repertoires'. *Frontiers*. 2021, <https://www.frontiersin.org/articles/10.3389/fpos.2021.663874/full>

51 Dela0 supplements its written features with multimedia content and a podcast and is funded by donations and grants. It occasionally collaborates/partners with larger publications to pick up its materials.

52 A. Diură. 'Punct final. Decât o Revistă se încheie după 13 ani. Mesajul fondatorului Cristi Lușă: "Oricum aş scrie propoziția asta, tot greu e'. *Pagina de media*, 2022, <https://www.paginademedia.ro/stiri-media/se-inchide-decat-o-revista-dor-20877970>

53 Set up after a large crowdfunding campaign that collected around 100,000 euro, the *Inclusiv* platform was intended to include subscribers in the process of story selection, as well as tapping into expertise among its base in researching and developing their material, among other planned innovations. Ultimately, however, the project leaders struggled with intra-newsroom disagreements, organisational issues and the project only published around a dozen news stories before closing in 2021. *Inclusiv*. "Inclusiv se inchide" [Inclusiv is closing], 2021, <https://inclusiv.ro/inclusiv-se-inchide/>



Slovakia

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Context

Slovakia is a landlocked Central European country with a population that exceeds 5.4 million.¹ Significant economic disparities exist between the capital, Bratislava, and the rest of the country. The gross domestic product of the Eastern Slovakia region is three times lower than the Bratislava region.² In terms of internet penetration, 90.7% of households in Slovakia have internet access at home.³

Both local media (in the case of broadcasting media) and community media are defined in the Slovak legal framework. The Media Services Act stipulates that: "A local broadcast programme service is a broadcast whose reception is confined to a smaller geographical area, usually a town or city, and whose programmes focus on local information environments or resources and on common interests that create and deepen the intrinsic bonds of a community, leading to the maintenance of a sense of identity with the community."⁴ Furthermore, the Publications Act refers to a community periodical as a publication focusing on local information, resources or common interests, deepening community ties, and without a profit motive. A similar definition of community media can be found in the Media Services Act.⁵

To summarise the state and development of local media in Slovakia, it could be argued that the relatively richly developed local and regional press established during the Communist regime before 1989 remains a fragment today. The report by Transparency International Slovensko on local journalism in Slovakia concluded that print news deserts cover a third of Slovakia.⁶ Traditional local media offering standard journalism have largely been replaced by media (print and/or TV) owned or funded by local governments and by commercial advertising periodicals distributed free of charge. Interestingly, the occurrence of news deserts does not appear to be easily explained by economic deprivation or low internet penetration in the area. In addition, some minorities, especially the Romani people, lack sufficient media content and news coverage in their mother tongue. Community media as a sector is very underdeveloped in Slovakia. Despite this unfavourable situation, the public debate regarding local news deserts is almost non-existent.

1 The World Bank, "Population, total", *The World Bank*, <https://data.worldbank.org/indicator/SP.POP.TOTL>

2 Eurostat, "Regional gross domestic product (PPS per inhabitant) by NUTS 2 regions", *Eurostat*, <https://ec.europa.eu/eurostat/databrowser/view/tgs00005/default/table?lang=en>

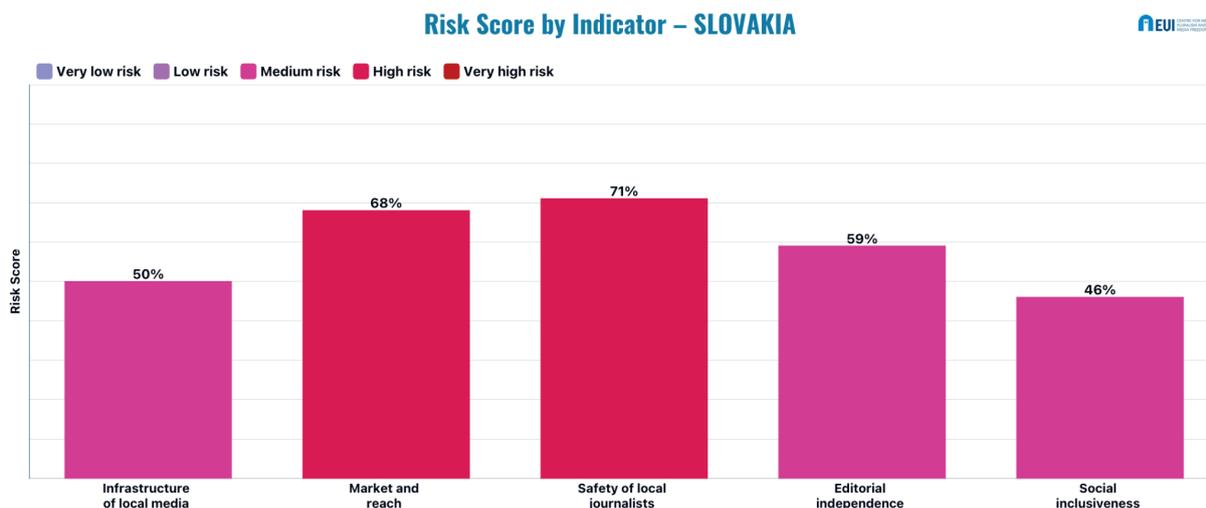
3 Statistical Office of the SR, "Survey on Information and Communication Technologies Usage in Households 2022", *Statistical Office of the SR*, <https://slovak.statistics.sk/PortalTraffic/fileServlet?Dokument=c323f3dc-be3b-470a-a999-8d5e86a90195>

4 Act No. 264/2022 Coll. on media services and on amendments and additions to certain acts (Media Services Act), § 19 (1) (5)

5 Act No. 264/2022 Coll. on media services and on amendments and additions to certain acts (Media Services Act), § 107 (2)

6 Ľ. Kostelanský & K. Kroková, "Kríza lokálnej žurnalistiky vo Vyšehradských krajinách a špecifická rola samosprávnych novín v nej", *Transparency International Slovensko*, Bratislava, 2022, p. 22, <https://transparency.sk/sk/kriza-lokalnej-zurnalistiky-narodna-studia-slovensko/>

In terms of the assessed risks, as shown in the following bar chart, the most critical areas include the safety of local journalists, mostly due to challenging working conditions and inadequate remuneration, coupled with the absence of a functional journalists' association. The market and reach indicator also poses significant concerns, primarily attributed to declining revenues, the closure of local newsrooms, and the absence of a dedicated subsidy system for local media. Both indicators achieve a high-risk score. The remaining three indicators—editorial independence, infrastructure of local media, and social inclusiveness—fall within the medium-risk category.



Granularity of infrastructure of local media - Medium risk (50%)

While basic data regarding local journalism in Slovakia are often lacking, the available information indicates a critical situation. The report by Transparency International Slovensko states that “Slovakia has found itself in a period when the map of regional media has critically emptied, quality journalism is abandoning even previously weak positions, while the space left vacant is often occupied by problematic actors. This situation is a direct threat to democracy at the local and regional level, for which public independent media scrutiny is as important as it is for democracy at the national level.”⁷ According to this report, approximately one-third of Slovakia is characterised as print news deserts, with these areas typically having the lowest population density.⁸ Rural and suburban regions are more underserved compared to urban areas.

The network of local journalists and newsrooms is primarily upheld by the two public service media entities. First, *Radio and Television Slovakia* (RTVS) maintains two regional studios, in Banská Bystrica (Central Slovakia) and Košice (Eastern Slovakia), along with a stable network of its own local/regional correspondents.⁹ Second, the *Press Agency of the Slovak Republic* (TASR) claims to have “the best network of editors, photographers, and video reporters in the regions”, covering a total of 18 cities in Slovakia.¹⁰

However, commercial media, particularly print media, both nationwide and local, have seen a reduction in the number of local journalists and the closure of local newsrooms in recent years. For instance, *Petit Press*, which owns the largest network of local print media, once published 30 local weeklies, but that number decreased to 19 by 2022; in addition, the number of journalists working at the weeklies declined from 58 in 2019 to 41 in 2022.¹¹

7 Ibid, p. 21.

8 Ibid, p. 22.

9 RTVS, “Výročná správa o činnosti a hospodárení RTVS 2022”, RTVS, Bratislava, 2023, p. 203, https://www.rtv.org/media/a542/file/item/sk/0002/vyrocná_správa_o_činnosti_a_hospodareni_rtv_2022.wy27.pdf.

10 TASR, “Najčastejšie otázky - FAQ”, TASR, <https://www.tasr.sk/o-agenture/FAQ>.

11 Kostelanský & Kroková, *Kríza lokálnej žurnalistiky vo Vyšehradských krajinách a špecifická rola samosprávnych novín v nej*, p. 5.

The map you can find at the [following link](#) refers to the local newspaper coverage in Slovakia in 2022. The original data source for this visualisation is Transparency International Slovensko and you can access it [here](#).

Market and reach- High risk (68%)

The indicator of market and reach scored high risk (68%). The systematic collection and publication of data on market shares and revenues for local and community media outlets are not in place, posing an inherent risk in itself. However, available evidence indicates a significant economic decline in the local media sector, with community media being generally very underdeveloped.

An analysis of revenues of local independent publishers (35 out of 44 independent local print media outlets in Slovakia) shows a 14% decline in publisher revenues between 2019 and 2021.¹² These challenges are further compounded by a high inflation rate, averaging 12.8% in 2022¹³, and the absence of any direct subsidy mechanism designed for local and/or community media (a situation applicable to media in Slovakia at large). However, cultural and national minority media, including local and community outlets, are eligible to receive grants from the state-funded Fund for the Promotion of National Minority Culture¹⁴ and the Slovak Arts Council¹⁵.

The sole indirect subsidy in place is the VAT reduction, which lowers the rate from 20% to 10% for the print press. This benefit applies exclusively to newspapers and magazines published at least four times a week.¹⁶ Consequently, this measure overlooks the majority of the local press, typically weekly periodicals, which continue to be sold at the standard VAT rate of 20%.

The availability of audience/circulation data is limited to selected media outlets, posing a challenge in evaluating the extent of ownership concentration in the local media market. Cases like that of the Petit Press publishing house, indicate that ownership concentration does not necessarily lead to economic dominance, given the continuous decline in sales and revenues of its local media outlets.¹⁷ Rather, it appears to be an economic necessity.

The willingness of audiences to pay for local news remains low, as evidenced, for instance, by the decline in sales of local weeklies and dailies experienced by the Petit Press publishing house.¹⁸ This trend is likely reinforced by the prevalence of free-of-charge media, including commercial advertising periodicals and print media outlets owned by local governments, which dominate the local media market.¹⁹

Safety of local journalists - High risk (71%)

The safety of local journalists was rated as a high-risk indicator, attaining the highest score of all five indicators (71%). This is attributed to the deterioration in working conditions for local journalists, coupled with the declining economic situation of local media. The number of local journalists is decreasing, and their wages are unattractive.²⁰ Although social security legislation is in place, a prevalent practice in Slovak journalism

12 Ibid, p. 14.

13 Reuters, "Slovak real wages drop most in 22 years amid high inflation", *Reuters*, 3 March 2023, <https://www.reuters.com/markets/europe/slovak-real-wages-drop-most-22-years-amid-high-inflation-2023-03-03/>.

14 Fund for the Promotion of National Minority Culture, "Výzva č. 1/2023 Fondu na podporu kultúry národnostných menšín", *Fund for the Promotion of National Minority Culture*, 2023, https://kultminor.sk/attachments/article/635/Vyzva%201_2023.pdf

15 Slovak Arts Council, "2.3 Vydávanie časopisov", *Slovak Arts Council*, <https://www.fpu.sk/sk/podprogramy/vydavanie-casopisov/>

16 Act No. 222/2004 Coll., Value Added Tax Act, § 27 (2)

17 Kostelanský & Křoková, *Kriza lokálnej žurnalistiky vo Vyšehradských krajinách a špecifická rola samosprávnych novín v nej*, p. 7.

18 Ibid, p. 7.

19 Ibid, p. 3 and p. 15.

20 Ibid, p. 5, p. 7 and p. 21.

involves circumventing employment contracts to reduce costs. Many journalists work as “self-employed” or “freelance” with limited social protection, even if they work exclusively for one newsroom for an extended period.

Furthermore, the Slovak Syndicate of Journalists, the main professional journalism association, does not effectively fulfil its role, either at the national or local level. It lacks authority, abstains from engaging in public debates on current issues related to journalists and journalism, and has an extremely low membership rate among active journalists.²¹

While there are no reports of attacks or threats specifically targeting local journalists, journalists in Slovakia as a whole frequently suffer attacks and intimidation, including instances of verbal abuse involving high-ranking politicians.²² The lack of reports of attacks against local journalists can be attributed to the challenging conditions faced by local journalism in Slovakia, which, among other things, are not conducive to investigative journalism, a common trigger for such attacks and threats. This could also be the reason why there are no reports of SLAPP cases against local journalists. In general, there is no anti-SLAPP legal framework in place.

Editorial independence - Medium risk (59%)

Political control of local media is not regulated; in general, public officials may not engage in business²³, but they are not prohibited from owning companies, including media companies. Traditional independent local media are being displaced by two types of local media with limited independence in terms of political and commercial interests, typically offering low journalistic value to society.

First, the local media market is dominated by outlets owned by local governments, i.e., municipalities and self-governing regions. This applies to the print press in particular, where the number of so-called “townhall periodicals”, distributed free of charge, is ten times higher than the number of independent local periodicals.²⁴ These periodicals are extensively utilized by local government leaders for self-promotion, resulting in a low diversity of viewpoints and opinions.²⁵ The legal obligation to maintain objectivity and balance, even though these townhall periodicals are funded by public resources, is not in place. Local governments also own a significant share of local broadcasters (26%)²⁶; other TV broadcasters depend on them financially²⁷.

Second, another significant source of competition for local print media comes from commercial advertising periodicals distributed free of charge, usually directly to household mailboxes; once again, the journalistic quality of these media outlets is problematic.

In general, state advertising is governed by general rules of the Act on public procurement (343/2015 Z. z.) and supervised by the Office for Public Procurement. However, this Act does not mention any specific rules regarding state advertising, and its distribution proves highly non-transparent. On a more positive note, while there is no direct subsidy system designed exclusively for local media, criteria for the distribution of indirect state subsidies (VAT reduction) are clearly defined and they are allocated to local media in both a fair and transparent manner.

21 M. Urbániková, "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: Slovakia, *European University Institute*, Florence, 2023, p. 12, <https://cadmus.eui.eu/handle/1814/75737>

22 ICJK, "Výskum: Cítia sa slovenskí novinári bezpečne?", *ICJK*, 2023, <https://www.icjk.sk/229/Vyskum-Citia-sa-slovenski-novinari-bezpecne>

23 Act No. 357/2004 Coll., Constitutional Law on the Protection of Public Interest in the Exercise of the Functions of Public Officials, Art. 5 (2)

24 Kostelanský & Kroková, *Kríza lokálnej žurnalistiky vo Vyšehradských krajinách a špecifická rola samosprávnych novín v nej*, 2022, p. 15.

25 Transparency International Slovensko, "Radničné noviny stále zostávajú najmä hlásnymi trúbami primátorov", *Transparency International Slovensko*, 2022, <https://hlasnetrubky.transparency.sk/aktuality/radnicne-noviny-stale-zostavaju-najma-hlasnymi-trubami-primatorov>

26 According to the analysis conducted by the author of this report for the LM4D project, based on data published by the Council for Media Services (the Slovak media regulatory authority), 26% of the local and regional broadcasters that held a TV broadcasting license in 2022 are directly owned or co-owned by a municipality or a self-governing region. See: Rada pre mediálne služby, *Správa o stave vysielania v Slovenskej republike a o činnosti Rady pre vysielanie a retransmisiu/ Rady pre mediálne služby za rok 2022*, Rada pre mediálne služby, Bratislava, 2023, https://rpms.sk/sites/default/files/2023-05/VS2022_web.pdf

27 Kostelanský & Kroková, *Kríza lokálnej žurnalistiky vo Vyšehradských krajinách a špecifická rola samosprávnych novín v nej*, 2022, p. 17.

There are no regulatory or self-regulatory mechanisms that grant protection to journalists in the event of changes in ownership or editorial direction at both the national and local levels. There are no regulatory safeguards, such as internal bodies or self-regulatory instruments, designed to ensure that decisions regarding the appointment and dismissal of editors-in-chief are not influenced by commercial interests.

With regard to the public service, there is no available information on the independence of RTVS local branches and regional studios. However, the recurring concerns²⁸ about the political independence of RTVS mean that political pressure cannot be ruled out.

Finally, the Council for Media Services (the Slovak media regulatory authority) has a remit over local broadcasters, and there are no reports suggesting that its decision-making practices have been compromised.

Social inclusiveness - Medium risk (46%)

Social inclusiveness has the lowest risk score of all the indicators at 46% (i.e., medium risk). This is mostly attributed to RTVS, the Slovak public service broadcaster, which consistently complies with legal requirements²⁹ and regularly broadcasts news in minority languages³⁰. The main commercial broadcasters do not allocate dedicated airtime to minorities, and it is not a legal obligation for them to do so. Nevertheless, a relatively high number of smaller private media outlets fulfil this role by offering news in minority languages.

However, there are significant differences in meeting the information needs of individual minorities. For the Hungarian minority, the largest in Slovakia (comprising around 8% of the population)³¹, there are commercial TV and radio channels broadcasting in Hungarian, along with a relatively large number of print and online news media in Hungarian, supported by both Slovak and Hungarian public funds. In contrast, the situation for the Roma minority (estimated to be around 8% of the Slovak population)³² is significantly worse. In 2022, there was no TV or radio station broadcasting in Romani.³³

Moreover, despite the absence of systematic data on the topic, the representation of minorities in commercial media outlets sometimes appears biased and misleading. For example, a recent analysis of media coverage concerning Muslims in print and digital media revealed an overall negative framing of topics related to Muslims.³⁴

In general, local media lack the capacity to adequately deliver sufficient public interest news to meet the critical information needs of the communities they serve. As explained in previous sections, the situation in the local media sector, particularly in local print media, is challenging, with more than a third of Slovakia covered by print news deserts.³⁵ This deficiency is partially alleviated by the provision of local news by RTVS, the Slovak public service broadcaster, and TASR, the public service news agency.

28 Urbániková, "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: Slovakia, p. 19.

29 Act No. 532/2010 Coll. on Radio and Television Slovakia, § 5 (1) (g)

30 The number of hours broadcast for national minorities on RTVS is regularly monitored by the Council for Media Services; see Rada pre mediálne služby, *Správa o stave vysielania v Slovenskej republike a o činnosti Rady pre vysielanie a retransmisii/ Rady pre mediálne služby za rok 2022*, p. 60-61.

31 ŠÚSR, "Počet obyvateľov podľa národnosti v SR k 1. 1. 2021", *Štatistický úrad Slovenskej republiky*, <https://www.scitanie.sk/obyvatelia/zakladne-vysledky/struktura-obyvatelstva-podla-narodnosti/SR/SK0/SR>

32 MVS, "Ábel Ravasz predstavil nový Atlas rómskych komunit - trendy sú pozitívne", *Ministerstvo vnútra Slovenskej republiky*, <https://www.minv.sk/?tlacove-spravy&sprava=abel-ravaszpredstavil-novy-atlas-romskych-komunit-trendy-su-pozitivne>

33 Rada pre mediálne služby, *Správa o stave vysielania v Slovenskej republike a o činnosti Rady pre vysielanie a retransmisii/ Rady pre mediálne služby za rok 2022*, p. 58-60.

34 Z. Hasna & N. Plulíková, *Framing: Mediálny obraz islamu a moslimov na Slovensku*, Islamská nadácia na Slovensku, Bratislava, 2022, <https://www.islamonline.sk/download/9574/>

35 Kostelanský & Kroková, *Kríza lokálnej žurnalistiky vo Vyšehradských krajinách a špecifická rola samosprávnych novín v nej*, p. 22.

Best practices and open public sphere

Due to the small market and challenging economic conditions, media in Slovakia have long been compelled to innovate. For instance, the two major national quality dailies, *Denník N*³⁶ and *SME*³⁷, publish newsletters, organise public discussions, offer a short message service with notifications and links to additional information (available on the web and in apps), produce podcasts, and publish books.

Denník N further contributes to education by publishing guides for teachers and students and organising lectures and discussions for schools. The daily has also developed the "Readers Engagement and Monetisation Platform", an open-source media subscription system that assists publishers in understanding and monetising their audience better.³⁸

There are very few civil society initiatives providing innovative responses to address the challenges posed by the decline of local and community news provision. The majority of such efforts are spearheaded by a single organisation, Transparency International Slovensko, which recently produced an in-depth report mapping the local media market in Slovakia.³⁹ Additionally, it regularly issues the quality assessment of the local print media outlets owned and published by local governments.⁴⁰

36 *Denník N*, 'O Denníku N', *Denník N*, 2022, <https://dennikn.sk/o-denniku-n/>

37 *SME*, 'SME Novinky', *SME*, <https://novinky.sme.sk/>

38 *Denník N*, 'O Denníku N', *Denník N*, 2022, <https://dennikn.sk/o-denniku-n/>

39 Kostelanský & Křoková, *Kříza lokálnej žurnalistiky vo Vyšehradských krajinách a špecifická rola samosprávnych novín v nej*.

40 Transparency International Slovensko, "Hlásne trúby", *Transparency International Slovensko*, n.d., <https://hlasnetruby.transparency.sk/>



Slovenia

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Context

There is not much debate on "news deserts" in Slovenia among policymakers, industry professionals or the public. In recent years, the media reported on the crisis of local print news media,¹ pointing mostly to the lack of financial resources and political pressures.² However, those reports and conversations were fragmented. There was, however, debate about so-called "white spots" as "areas where there is no adequate broadband infrastructure, but at the same time operators have no market interest in building it". The Ministry of Digital Transformation described white spots in Slovenia as "sparsely populated and remote settlements."³ In 2019, there were approximately 40,000 to 50,000 households in such areas⁴. White spots are scattered throughout Slovenia, however data suggest there are more of them in the eastern part of the country.⁵ The lack of adequate digital infrastructure influences the accessibility of news in those areas.

There is significant economic disparity between Eastern and Western Slovenia, with the former being richer.⁶ Slovenia's urban system is characterised by a highly dispersed settlement system with "small densities of urban population, which creates a specific socio-spatial context that is very connected to the local environment and small communities. The media are adapted to the Slovenian socio-spatial context and are, in terms of the geographical distribution of content, very local and regional."⁷

While local and regional media are somewhat legally defined⁸—local radio and television programmes serve residents of areas where no more than 10% of the Slovene population lives, while regional radio and television programmes serve residents of areas where more than 10 and not more than 50% of the population lives—community media do not have a legal definition. The Mass Media

1 D. Kos, Slovenski tiskani mediji v vse večjih težavah. Kje so rešitve?, *Siol.net*, 2023, <https://siol.net/novice/slovenija/slovenski-tiskani-mediji-v-vse-vecjih-tezavah-kje-so-resitve-596622>.

2 U. Zupan, Izzivi lokalnih medijev: pomanjkanje finančnih virov in politični pritiski, *24ur.com*, 2022, <https://www.24ur.com/novice/volitve/lokalne-volitve-2022/izzivi-lokalnih-medijev-pomanjkanje-financnih-virov-in-politichni-pritiski.html>.

3 Ministrstvo za digitalno preobrazbo, Bele lise imenujemo območja, ... [Facebook post], 2023, <https://www.facebook.com/digitalSLO/posts/pfbid06hknZsZnHe2DeyYEiCcak3Ajif6gomqBgQ7sfEKYxH6s8aKx4WcauJNdfzFmVDvTl>.

4 P. Malovrh, Novi milijoni za "digitalno avtocesto" do belih gospodinjstev, *Delo*, 2019, <https://www.delo.si/novice/slovenija/novi-milijoni-za-digitalno-avtocesto-do-belih-gospodinjstev/>.

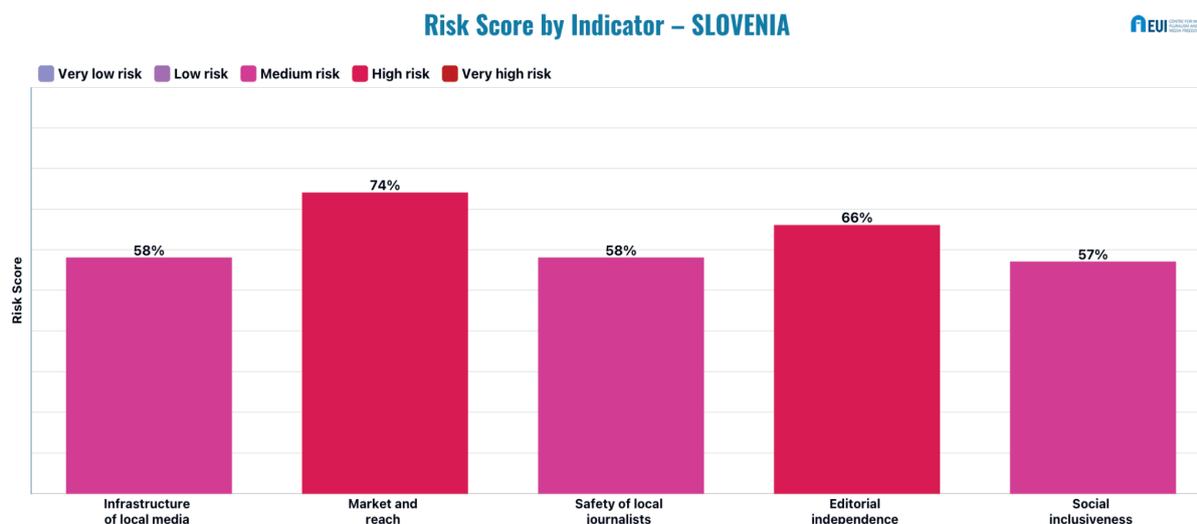
5 Ministrstvo za javno upravo, Pregledovalnik belih lis, https://eprstor.gov.si/isv-test/bele_lise.html.

6 Eurostat, Regional gross domestic product (PPS per inhabitant) by NUTS 2 regions, <https://ec.europa.eu/eurostat/databrowser/view/tgs00005/default/map?lang=en>.

7 M. Uršič, Online news media and local stakeholders in the urban development process – the case of renovating the Bežigrad stadium in Ljubljana, *Teorija in praksa*, 53/5, 2016, 1191, https://www.fdv.uni-lj.si/docs/default-source/tip/ursic_ok.pdf?sfvrsn=2.

8 Zakon o medijih (ZMed), 2001, <http://pisrs.si/Pis.web/pregledPredpisa?id=ZAKO1608>.

Act does however define student and non-profit radio and television programmes, a definition where some (but not all) community media can find their place. Local, regional, student and non-profit radio and television programmes are characterised as programmes of special importance, which are partially funded from the state budget.



Granularity of infrastructure of local media – Medium risk (58%)

Slovenia is composed of more than 87% rural areas, where around 75% of the entire population lives.⁹ Slovenian cities are small to medium-sized, “out of a total of 6,035 settlements, as many as 90% of them have less than 500 inhabitants and only two settlements have more than 50,000 inhabitants.”¹⁰ Rural and suburban areas therefore often correlate.

Media that reach those communities can be divided into local and regional, while the latter usually cater to a national audience as well. Regional radio stations (such as *Murski val*, *Radio Ptuj*, *Koroški radio*, *Štajerski val*, *Radio Celje*, *Radio Kranj*, *Primorski val*) and regional print media (such as *Gorenjski glas*, *Primorske novice*, *Vestnik*, *Dolenjski list*, *Štajerski tednik*, *Novi tednik*) reach the biggest population. Local and regional television programmes are less developed. Generally speaking, the national network of correspondents has shrunk in all media sectors compared to a decade or two ago.¹¹

In urban areas, digital only outlets, print outlets and their online versions are most common (for instance *Večer* and *Mariborinfo.com* in Maribor, *Dnevnik* in Ljubljana), and they also cover the political aspects of local governance. Community media are also present in bigger cities: neighbourhood magazines (for instance the local newspaper in Ljubljana *Savčan*); cultural websites and print outlets (*Koridor – križišča umetnosti*, *Outsider*); student and non-profit radio stations (*Radio Študent* in Ljubljana, *Neodvisni obalni radio (NOR)* in Koper, *Radio MARŠ* in Maribor).

The law regulating the national public broadcaster *RTV Slovenija (RTVS)*¹² specifies that broadcasting from the regional centres in Maribor (second-largest city) and Koper (fifth-largest city) is part of the public service, so is broadcasting programmes for the Hungarian, Italian and Roma ethnic communities. Based on public information, the public broadcaster has 9 local correspondent locations in Slovenia.¹³ However, *RTVS* has been experiencing financial difficulties. When measures for the financial hardship were considered in 2023 the cancellation of the

9 Ministrstvo za kmetijstvo, gozdarstvo in prehrano, Ministrica Šinko na forumu o oblikovanju prihodnosti podeželja, *Gov.si*, 2023, <https://www.gov.si/novice/2023-09-28-ministrica-sinko-na-forumu-o-oblikovanju-prihodnosti-podezelja/>.

10 Sektor za strateški prostorski razvoj, Mesta in urbana območja v Sloveniji, *Gov.si*, 2023, <https://www.gov.si/teme/mesta-in-urbana-obmocja-v-sloveniji/>.

11 P. Lesjak Tušek, (INTERVJU) Greta Kokot Rajković, Štajerski val: Verodostojna lokalna informacija bo preživela, *Večer*, 2023, <https://vecer.com/v-soboto/intervju-greta-kokot-rajkovic-stajerski-val-verodostojna-lokalna-informacija-bo-prezivila-10331765>.

12 Zakon o RTV Slovenija (ZRTVS-1), Uradni list RS, št. 96/05, 109/05 – ZDavP-1B, 105/06 – odl. US, 26/09 – ZIPRS0809-B, 9/14 in 163/22, <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO4461>.

13 RTV Slovenija, Televizija Slovenija, <https://www.rtvlo.si/rtv/kdo-smo/televizija-slovenija>.

regional programmes of radio and television in Koper and Maribor was also discussed.¹⁴ The only public press agency is the *Slovenian Press Agency (STA)*. The agency states on its website "more than 80 journalists and other colleagues are responsible for the fulfilment of tasks, both in the Ljubljana 'headquarters' and in correspondent offices around Slovenia and the world."¹⁵ However, a representative of STA described in 2021 that a "tenth of the team has left" the agency.¹⁶ During that time, the government led by *Janez Janša* suspended funding for performing the public service of STA for 312 days, which consequently left the agency financially exhausted and staff depleted.¹⁷

Market and reach – High risk (74%)

Assessing the economic conditions, viability and sustainability of local and community media in Slovenia is difficult, as there are no aggregate statistics publicly available, which would include (state) advertising, sales, licensing fees, circulation, subscriptions, affiliate marketing, donations, sponsorships and exclude public funding of local and community media. It is recommended that more monitoring of the local media market is done, stating "in this way, the responsibility of local media towards the public could be increased, risks to media existence and autonomy could be more easily identified, and knowledge and strategies for sustainable and autonomous local media could be provided."¹⁸

Local and community media outlets in Slovenia are "vulnerable to external influences and changes, such as the COVID-19 pandemic, due to a lack of diversity in sources of funding",¹⁹ the report also showed, stating many local media outlets rely on one source of revenue. The pandemic influenced the print sector specifically, as newsstands and kiosks were closed and many of them never reopened. Representatives of *Primorske novice* and *Dnevnik* for instance discussed difficulties in selling their newspaper in 2023, stating a drop in newspaper circulation is making it more difficult to find newspaper delivery men; combined with the rising costs of paper and fuel their activity is less and less economically sustainable.²⁰ This has led *Primorske novice* to reduce its publication frequency in 2024.²¹

The media legislation allocates a certain amount of state funding for the development of programme content of radio and television programmes with the status of local, regional, student or non-profit programmes. The funds are accessible in the form of a yearly public tender, published by the Ministry of Culture.

The figures indicate the value of available funds has been more or less stagnating. In 2023, the approximate value of available funds on the main public tender was 2.9 million euro, from which 2.1 million was available for the area of co-financing programme content of radio and television programmes with local, regional, student or non-profit status, also known as "area B".²² In 2022, the approximate value was 3.1 million euro, of which 2.25 million was available for area B.²³ In 2021 and 2020, the approximate value was

14 STA, Varčevanje na RTVS: bodo ukinili Panoramo, Radio Si, TV Koper in Maribor?, *N1 Slovenija*, 2023, <https://n1info.si/novice/slovenija/svetniki-rtvs-bodo-obravnavali-poslovanje-zavod-naj-bi-letu-koncal-z-dobickom/>.

15 Slovenska tiskovna agencija, O agenciji, <http://agencija.sta.si/o-agenciji>.

16 Svet delavcev STA, Zastopstvo Uredništva STA, Uredniški kolegij STA, Sindikat novinarjev STA, Pismo zaposlenih na STA vodjem EU institucij, STAagencija, 2021, <https://agencija.sta.si/2938641/pismo-zaposlenih-na-sta-vodjem-eu-institucij>.

17 Društvo novinarjev Slovenije, Upamo, da je agonija STA končana, *Društvo novinarjev Slovenije*, 2021, <https://novinar.com/novica/upamo-da-je-agonija-sta-koncana/>.

18 Društvo novinarjev Slovenije, V lokalnih medijih naj bo več raznolikih tem, izvernih zgodb in povezovanja, 2022, <https://novinar.com/novica/vec-raznolikih-tem-lokalni-mediji/>.

19 D. Jurčić, S. Kljajić, T. Turnšek, D. Vozab, Report on the Results of Local Media for Better Society and Recommendations for Local Media, 2022, <https://novinar.com/wp-content/uploads/2019/09/Report-LMBS.pdf>.

20 D. Kos, Mediji so steber demokracije. Ali je to tudi papir?, *Siol.net*, 2023, <https://siol.net/novice/slovenija/mediji-so-steber-demokracije-ali-je-to-tudi-papir-597628>; D. Kos, Slovenski tiskani mediji v vse večjih težavah. Kje so rešitve?, *Siol.net*, 2023, <https://siol.net/novice/slovenija/slovenski-tiskani-mediji-v-vse-vecjih-tezavah-kje-so-resitve-596622>.

21 S. Kos, Prvi časopis v Sloveniji ukinja tiskano izdajo, *Delo*, 2023, <https://www.delo.si/novice/slovenija/prvi-casopis-v-sloveniji-ukinja-tiskano-izdajo/>.

22 Ministrstvo za kulturo, Redni letni javni projektni razpis za sofinanciranje programskih vsebin medijev v letu 2023 (JPR-MV-2023), *Gov.si*, 2022, <https://www.gov.si/zbirke/javne-objave/redni-letni-javni-projektni-razpis-za-sofinanciranje-programskih-vsebin-medijev-v-letu-2023/>.

23 Ministrstvo za kulturo, Redni letni javni projektni razpis za sofinanciranje programskih vsebin medijev v letu 2022, *Gov.si*, 2021, <https://www.gov.si/zbirke/javne-objave/redni-letni-javni-projektni-razpis-za-sofinanciranje-programskih-vsebin-medijev-v-letu-2022/>.

2.67 million euro, of which 2.07 million was available for area B.²⁴ However, systematic long-term funding that would enable employment, guarantee independence from political and market pressures and help establish functionality of both community and local/regional media in the long run is needed.

The availability of sources to fund innovation presents a high risk, as there are no specific funding mechanisms for innovation in place. The originality of media content is, however, one of the criteria for selecting media outlets in the aforementioned tender.

The local media landscape is characterised by high levels of ownership concentration, which was recognised as a very high risk and standout issue in Slovenia. This research noted that a complex network of companies, associated with businessman *Martin Odlazek*, owns a huge share of Slovenian local media, which presents a “great risk for ownership influence and a threat to media pluralism.”²⁵

There is no data to indicate how willing Slovenian audiences are to pay for news. Some editors of print media have stated audiences “are no longer willing to pay for demanding and high-quality journalistic content”,²⁶ also indicating around 10% of the Slovene population is willing to pay for news.²⁷

Safety of local journalists – Medium risk (58%)

Representatives of journalistic organisations stated in 2023 that wages are no longer the biggest problem for Slovene journalists, overload of work has taken its place.²⁸ A survey provided by the Slovene Association of Journalists a few years ago also showed overwork is the biggest issue for journalists in Slovenia, followed by low salaries.²⁹

There were 2,306 fully employed journalists in Slovenia in 2022;³⁰ 2,574 persons fully employed in radio and television activity and 87 self-employed in this activity.³¹ The average gross pay cheque for people employed in the radio and television activity in 2022 was 2,351 euro.³² This is however national data and there is no available data with a focus on local journalists alone. The general minimum gross wage in the country in 2022 was 1,074.43 euro.³³ There is also no publicly available data on the remuneration of freelancers or self-employed journalists, either at the national or local level.

Freelancers and self-employed journalists do not have specific social security schemes, they fall under the general schemes provided for self-employed individuals, which include payment of contributions and salary compensation due to sick leave or care of a close family member under certain conditions.³⁴ Those with the status of “self-employed in culture” can apply for the right to pay social security contributions from

24 Ministrstvo za kulturo, Redni letni javni projektni razpis za sofinanciranje programskih vsebin medijev v letu 2021, *Gov.si*, 2020, <https://www.gov.si/zbirke/javne-objave/redni-letni-javni-projektni-razpis-za-sofinanciranje-programskih-vsebin-medijev-v-letu-2021/>; Ministrstvo za kulturo, Redni letni javni projektni razpis za sofinanciranje programskih vsebin medijev v letu 2020, *Gov.si*, 2019, <https://www.gov.si/zbirke/javne-objave/redni-letni-javni-projektni-razpis-za-sofinanciranje-programskih-vsebin-medijev-v-letu-2020/>.

25 D. Jurčič, S. Kljajić, T. Turnšek, D. Vozab, Report on the Results of Local Media for Better Society and Recommendations for Local Media, 2022, <https://novinar.com/wp-content/uploads/2019/09/Report-LMBS.pdf>.

26 D. Kos, Mediji so steber demokracije. Ali je to tudi papir?, *Siol.net*, 2023, <https://siol.net/novice/slovenija/mediji-so-steber-demokracije-ali-je-to-tudi-papir-597628>.

27 K. Komar, INTERVJU. Gregor Knafelc, Delo, o digitalizaciji medijev, *Goodlife* (poletje 2022), 2022, https://issuu.com/goodliferevija/docs/gl_58_issu/s/16166661.

28 K. Jakopič, Največja težava novinarjev v Sloveniji niso več slabe plače, ampak preobremenjenost, *MMC RTV Slovenija*, 2023, <https://www.rtvsllo.si/slovenija/najvecja-tezava-novinarjev-v-sloveniji-niso-vec-slabe-place-ampak-preobremenjenost/652915>.

29 Društvo novinarjev Slovenije, Anketa: Novinarji s(m)o preobremenjeni in premalo plačani, *Društvo novinarjev Slovenije*, 2020, <https://novinar.com/novica/anketa-novinarji-smo-preobremenjeni-in-premalo-placani/>.

30 SiStat, Delovno aktivno prebivalstvo po skupinah poklicev (SKP-08) in spolu, Slovenija, letno, *Statistični urad*, <https://pxweb.stat.si/SiStatData/pxweb/sl/Data/-/0764803S.PX>.

31 SiStat, Delovno aktivno prebivalstvo po dejavnostih (SKD 2008), Slovenija, letno, *Statistični urad*, <https://pxweb.stat.si/SiStatData/pxweb/sl/Data/-/0775321S.px>.

32 SiStat, Povprečne mesečne plače (EUR) po dejavnostih (SKD 2008) in kohezijskih regijah prebivališča, Slovenija, letno, *Statistični urad*, <https://pxweb.stat.si/SiStatData/pxweb/sl/Data/-/0711312S.px/>.

33 Direktor za delovna razmerja in pravice iz dela, Minimalna plača, <https://www.gov.si/teme/minimalna-placa/>.

34 M. Poredoš, “Ne moremo si privoščiti zbolet!” - Bolniška odsotnost v svetu prekarnega dela, *Zveza svobodnih sindikatov Slovenije*, 2023, <https://www.zsss.si/ne-morem-si-privosciti-zboleti-93/>.

the state budget.³⁵ Journalists' organisations are somewhat present on the local level, for instance journalists' unions and collective organisations at specific media outlets, which are broadly connected to the national organisations (mainly the Slovene Association of Journalists³⁶ and the Slovenian Union of Journalists³⁷). While these are an important voice for journalists against media owners and local, regional or national authorities, they are often also unsuccessful in ensuring editorial independence and the professional standards of local journalists, as their voice is easily ignored. Local journalists adhere to the same ethics code as national journalists.³⁸

Throughout 2023, the Slovene Association of Journalists reported 15 verbal or physical attacks on journalists (at the local, regional and national level), in 2022 the association reported 20 and in 2021, when the platform for reporting attacks was established, they reported 32.³⁹ There is no anti-SLAPP legal framework in place, despite several calls for it from civil society.⁴⁰ The number of SLAPP cases, which occurred in the local and regional environment, is unknown.

Editorial independence – High risk (66%)

Media laws do not regulate the conflict of interests between owners of media and political parties or politicians, there is a general law on integrity and prevention of corruption, which does not mention media companies or media in specific terms.⁴¹ Several digital only local media outlets are affiliated with major political parties, specifically the current opposition party, SDS.⁴²

Municipal magazines and outlets financed from public budgets are also problematic, as they often serve as public relations outlets for the local mayors and their parties. In several municipalities or even regions, they can be the most important or even the only source of information about what is happening in the municipality.⁴³

As mentioned, direct subsidies are distributed to media outlets based on a set of publicly available criteria. The distribution of advertising of national, regional or local governments and companies owned or controlled by the state is however lacking transparency and the lack of standards in this area “makes it impossible to sanction violations, since they are not actually violations.”⁴⁴

There are no specific legal provisions granting protection to journalists in the case of changes in ownership or the editorial line. The Slovenian Union of Journalists and other professional organisations offer free legal help and support. There are also no regulatory safeguards, including internal bodies or self-regulatory instruments, which seek to ensure that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests.

The journalists' unions of RTVS (including the regional centres in Maribor in Koper) went on strike in 2022 among other opposing arbitrary interventions in the programme and content, violations of programming and professional standards, non-transparent staffing and demanding journalistic, editorial, institutional autonomy.⁴⁵ That same year the government of *Robert Golob* passed the new law on RTVS, arguing the changes would depoliticize the public broadcaster, and the law entered into force after being confirmed on a referendum. There were still many issues with implementation in 2023, however, due to the provisions of the law the management

35 Zakon o uresničevanju javnega interesa za kulturo (ZUJIK), 2002, <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO3370>.

36 Društvo novinarjev Slovenije, <https://novinar.com/>.

37 Sindikat novinarjev Slovenije, <https://sindikar-novinarjev.si/>.

38 Društvo novinarjev Slovenije, Kodeks novinarjev Slovenije, <https://novinar.com/drustvo-novinarjev-slovenije/o-nas/dokumenti/kodeks/>.

39 Društvo novinarjev Slovenije, Prijavi napad, *Društvo novinarjev Slovenije*, <https://novinar.com/prijavi-napad/>.

40 Društvo novinarjev Slovenije, SLAPP postopki resna grožnja - zakonodaja nujna, *Društvo novinarjev Slovenije*, 2022, <https://novinar.com/novica/slapp-postopki-resna-groznja-zakonodaja-nujna/>.

41 Zakon o integriteti in preprečevanju korupcije (ZIntPK), 2010, <http://pisrs.si/Pis.web/pregledPredpisa?id=ZAKO5523>.

42 B. Vezjak, (Pre)poznate strankarske medije?, *Mladina*, 2020, <https://www.mladina.si/196476/pre-poznate-strankarske-medije/>.

43 L. J. Kučič, Občinska glasila: milijoni evrov javnega denarja za promocijo županov, *Pod črto*, 2019, <https://podcrto.si/obcinska-glasila-milijoni-evrov-javnega-denarja-za-promocijo-zupanov/>.

44 D. Savič, Državne oglaševalske pogodbe so naravne nesreče, *The L Files*, 2022, <https://www.dsavic.net/2022/09/13/drzavne-oglavsevalske-pogodbe-so-naravne-nesrece/>.

45 RTV Slovenija stavka, <https://rtvslo-stavka.si/>.

of the RTVS changed.⁴⁶ This research found that some topics, such as religion, science and technology, education, civil society and social issues, are underrepresented in Slovene local media. Another content analysis of five online local media also showed certain actors are underrepresented, for instance women, opposition politicians, trade unions and cultural workers, while others (for instance, politicians in power or men) are more represented. The study also found there is not enough variety of sources in local media stories, as most of the analysed articles were based on only one source. “The reasons can be found in the lack of staff in newsrooms, unreliable sources and political pressures, which make many sources inaccessible,” the authors wrote, reporting also on a widespread presence of economic, political and advertising pressures.⁴⁷ These issues combined with concentration of media ownership and political misuse are raising many questions about the plurality of local media in Slovenia.

The Agency for Communication Networks and Services of the Republic of Slovenia (AKOS), the Slovenian Competition Protection Agency (AVK) and the Culture and Media Inspectorate of the Republic of Slovenia have a remit over all media in the country, including local media.

Social inclusiveness – Medium risk (57%)

PSM radio and television channels provide regular national news in some minority languages, namely Hungarian and Italian, as members of those communities can follow channels especially dedicated to them. National news in other minority languages is not available on the PSM channels on a day-to-day basis.

The offer of news in minority languages on the most viewed private media with the biggest reach is generally rare. News programmes in minority languages are fragmented and on a few (community) media outlets, for instance radio stations *Študent*, *MARŠ* and *Romic*. The representation of all minorities on private media outlets and services therefore presents a high risk. The representation of minorities in PSM on the other hand presents a medium risk.

While the members of the legally recognised Hungarian and Italian minorities have access to their local government funds and can use them to carry out their own media activities, the members of the Roma community, which is also recognised by law, can only apply to the tenders of the Office for National Minorities and the Ministry of Culture, where they have to compete with established national media.

There is a limited amount of specific outlets or channels addressing marginalised groups, for instance online newspaper *Časoris* aimed at children, segments for youth on student radio stations, a street newspaper specialising in homelessness and related social issues *Kralji ulice*. The majority of content for marginalised groups is available on the public broadcaster, which is by law required to serve the whole population.

Generally speaking, local media meet some of the “critical information needs” of local communities, such as supplying information on topics that affect the quality of local residents’ lives, information that is useful to citizens in order to make informed decisions, and timely information about local events, emergency alerts, public health issues, environmental hazards. This was for instance evident in 2023, when Slovenia was hit by most severe floods to date.⁴⁸ However, local media outlets can also lack diversity because of the political and ownership issues described in previous parts of this chapter. The connection of local media with their audience and local communities is strong when considering outlets that “have decades of tradition and were founded by local residents.”⁴⁹

46 K. J. Constitutional Court stops implementation of new RTV Slovenija Act, *RTV Slovenija*, 2023, <https://www.rtv slo.si/radio-si/news/constitutional-court-stops-implementation-of-new-rtv-slovenija-act/658558>; Media Freedom Rapid Response, Slovenia: Media freedom groups welcome court ruling on RTV SLO reform, *Article 19*, 2023, <https://www.article19.org/resources/slovenia-media-freedom-groups-welcome-court-ruling-on-rtv-slo-reform/>.

47 Društvo novinarjev Slovenije, V lokalnih medijih naj bo več raznolikih tem, izvirnih zgodb in povezovanja, 2022, <https://novinar.com/novica/vec-raznolikih-tem-lokalni-mediji/>.

48 Društvo novinarjev Slovenije, Hvala novinarskim ekipam, ki informirate prebivalce!, *Društvo novinarjev Slovenije*, 2023, <https://novinar.com/novica/hvala-novinarskim-ekipam/>

49 P. Lesjak Tušek, (INTERVJU) Greta Kokot Rajković, Štajerski val: Verodostojna lokalna informacija bo preživela, *Večer*, 2023, <https://vecer.com/v-soboto/intervju-greta-kokot-rajkovic-stajerski-val-verodostojna-lokalna-informacija-bo-prezivila-10331765>.

Best practices and the open public sphere

There is a limited amount of innovative practices aimed at enhancing an open and thriving public sphere in specific communities. The public editorial meetings held regularly by the investigative centre *Oštro* are a good example, as their focus is connecting with readers.⁵⁰ *Neodvisni obalni radio (NOR)* can also be considered as an example of innovation. It is an independent online radio, launched in 2020, which also broadcasts for the Italian minority in Slovenia and the Slovenian minority in Italy. The radio's representatives founded the "Association of free community media" (*Neuvrščeni – Zveza svobodnih skupnostnih neodvisnih medijev tretjega medijskega sektorja*), with *Radio Študent* and *Radio MARŠ* in 2021. This association strives for greater recognition of the social value of free community media and their role as a kind of local public service, formal recognition of the third media sector in legislation and its empowerment for further existence and development.⁵¹

The online donor platform in support of independent media *Nov dan* is also an example of an innovative response. It was established in 2022 by the non-profit organisation *Danes je nov dan* with the aim of supporting critical independent media and media creators working in the fields of investigative journalism and active citizenship. It functions with the help of an open standard for web monetization WMS.⁵² As things stand, readers can pay monthly subscriptions to five online media outlets, whose content is otherwise free: *Oštro*, *Boris Vezjak (In media res)*, *Mešanec*, *Domen Savič (Državljan D)* and *Agrument*.

The online portal *Ovtar24.si*, which won the Journalism Fund tender in 2023, can also be considered as an innovative response; the jury noted its "innovation, contributing to the building of a stimulating local environment and quality local journalism in the public interest."⁵³

50 Uredništvo Oštra, Oštro javno razpravljaj o Detektorju premoženja, *Oštro*, 2023, <https://www.ostro.si/si/novice/ostro-javno-razpravljaj-o-detektorju-premozenja>.

51 Neuvrščeni – Zveza svobodnih skupnostnih neodvisnih medijev tretjega medijskega sektorja, <https://neuvrsceni.org/>.

52 Nov dan – donatorska platforma v podporo neodvisnim medijem, <https://novdan.si/>.

53 Društvo novinarjev Slovenije, Slovenski lokalni medij Ovtar24.si uspešen na mednarodnem razpisu, *Društvo novinarjev Slovenije*, 2023, <https://novinar.com/novica/slovenski-lokalni-medij-ovtar24si-uspesen/>.



Spain

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Context

Studies have provided insights into different facets of local news deserts in Spain, contributing to recent academic discussion. One study¹ identifies municipalities that face the risk of turning into news deserts, characterised by a lack of diverse media outlets. The research underscores the crucial role of local news coverage in meeting critical information needs, highlighting factors like population size, economic conditions, and technological accessibility as contributors to the emergence of news deserts. Another study² delves into the contemporary landscape of digital journalism, with a specific focus on digital natives. It uncovers the existence of digital information deserts in regions experiencing depopulation, where digital native media outlets step in to address gaps left by the disappearance of traditional media. The results under LM4D align with these studies.

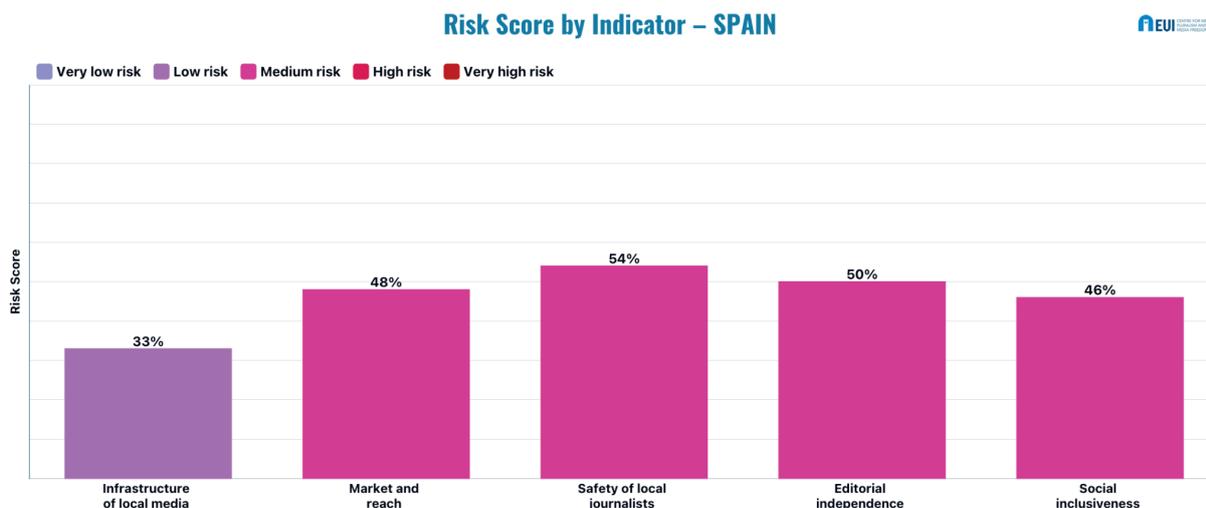
The discussion extends to legal frameworks shaping media landscapes, namely the recently enacted Law 13/2022 of 7 July, General Law on Audiovisual Communication.³ Community media are mentioned in Article 5, where they are considered key agents for the pluralization of information. Additionally, they have a specific role to play in the development of media literacy, as stated in Article 10. Article 49 covers the provision of audio-visual communication services for non-profit community television stations, while Article 81 covers audio-visual communication services for non-profit community radios.

In 2019, the Catalan Parliament released a preliminary report for public consultation proposing changes to address concerns about non-profit community media's legal status. The approval of the Catalan Government's draft law on audio-visual communication in 2023 represents progress in establishing a more defined regulatory framework.⁴

The most impoverished regions in Spain coincide with news deserts. The Autonomous Cities of Ceuta and Melilla, and La Rioja, are the three with the lowest number of local online media outlets⁵

- 1 M. Negreira-Rey, J. Vázquez-Herrero, X. López-García, 'No People, No News: News Deserts and Areas at Risk in Spain', *Media and Communication*, 11(3) (2023), 293-303, <https://doi.org/10.17645/mac.v11i3.6727>
- 2 Infotendencias DIGINATIVEMEDIA, *Cibermedios nativos digitales en España. Caracterización y tendencias*, 2021, <http://infotendencias.com/presentacion--cibermedios-nativos-digitales-en-espana-caracterizacion-y-tendencias/>.
- 3 BOE (Boletín Oficial del Estado), Ley 13/2022, de 7 de julio, General de Comunicación Audiovisual, 2022, <https://www.boe.es/buscar/act.php?id=BOE-A-2022-11311>.
- 4 Participa.gencat.cat, *Memòria preliminar de l'Avantprojecte de llei de modificació de la Llei 22/2005, de 29 de desembre, de la comunicació audiovisual de Catalunya*, 2019, https://participa.gencat.cat/uploads/decidim/attachment/file/865/AG_Memoria_preliminar_Avantprojecte_reforma_LCAC.pdf.
- 5 R. Salaverría, M.-P. Martínez-Costa, S. Negro, M. Paisana, M. Crespo, *IBERIFIER Digital Media Dataset (1.1.0)* [Data set]. Zenodo, 2022, <https://map.iberifier.eu/>.

and the less populated.⁶ This aligns with their designation as the most economically deprived NUTS2 regions.⁷ Internet usage, despite a national rate of 94%, varies in certain Autonomous Communities.⁸ Even in regions with lower rates, the presence of local cybermedia suggests that internet penetration does not necessarily equate to a lack of access to local news. Despite lower internet usage rates in specific regions, such as Galicia, Extremadura, and Cantabria, they exhibit substantial local media presence.



Granularity of infrastructure of local media – Low risk (33%)

The data on news deserts reveals five Spanish Autonomous Communities having over 90% of their municipalities classified as news deserts,⁹ based on the examination of digital media throughout the country. Out of the total 8,131 municipalities in Spain, 77.5% lack local media or regular news coverage, affecting 24.5% of the country's population. Additionally, 6.4% of municipalities are covered by only one media outlet.

Analysing the distribution of media outlets per municipality,¹⁰ excepting for news deserts, the norm is 1-5 outlets providing regular news coverage. Municipalities with 6-10 outlets are uncommon, and those exceeding 10 outlets are exceptional.

Urban communities typically enjoy the robust presence of local media outlets, with various media groups in different Autonomous Communities. These outlets include independent local newspapers, local editions of national and regional newspapers, as well as online-only local media platforms.

In rural areas, local media outlets, especially digital platforms, play a crucial role in providing information, even in the largest Autonomous Communities with lower population densities. These digital platforms have gained significance in depopulated regions, contributing to the preservation of the right to information in geographically remote areas. However, the sustainability of these small media initiatives remains a challenge. Traditional media have gradually reduced their presence, including correspondents, in rural areas. Another study¹¹ emphasises this concern, examining around 30 small digital media platforms that have surfaced in rural areas of Aragon. Aragon is ranked as the fourth-largest autonomous community in terms of territorial extension and stands out as one of the most sparsely populated regions.

6 INE (Instituto Nacional de Estadística), Cifras oficiales de población resultantes de la revisión del Padrón municipal a 1 de enero. Resumen por comunidades autónomas, 2021, <https://www.ine.es/jaxiT3/Datos.htm?t=2915#!tabs-tabla>.

7 Eurostat, Gross domestic product (GDP) at current market prices by NUTS 2 regions, 2023.

8 INE (Instituto Nacional de Estadística), Survey on Equipment and Use of Information and Communication Technologies (ICT) in Households. Year 2022, 2022, https://www.ine.es/en/prensa/tich_2022_en.pdf.

9 M. Negreira-Rey, J. Vázquez-Herrero and X. López-García, No People, No News: News Deserts and Areas at Risk in Spain, *Media and Communication*, 11(3) (2023), pp. 293-303, <https://doi.org/10.17645/mac.v11i3.6727>.

10 M. Negreira-Rey, J. Vázquez-Herrero and X. López-García, No People, No News: News Deserts and Areas at Risk in Spain, *Media and Communication*, 11(3) (2023), pp. 293-303, <https://doi.org/10.17645/mac.v11i3.6727>.

11 A. Segura-Anaya, I. Iniesta-Alemán, A.-C. Mancho-De-la-Iglesia and C. Marta-Lazo, El derecho a la información en las zonas despobladas como oportunidad de empleo y desarrollo en el medio rural: caso de los medios digitales hiperlocales en las comarcas de Aragón, España, in: *Comunicación y diversidad. Selección de comunicaciones del VII Congreso Internacional de la Asociación Española de Investigación de la Comunicación (AE-IC)* (Valencia: EPI SL, 2020), pp. 205-216, <https://doi.org/10.3145/AE-IC-epi.2020.e10>.

The journalism profession in rural and small urban areas is characterised by a stable but potentially decreasing number of journalists, with disparities between provinces.¹² These professionals play a vital role in reporting on local communities. However, they face challenges such as instability, precariousness, low wages, and limited prospects for the future.

The media landscape in Spain is dominated by four private major nationwide multimedia corporations and several regional media groups. In addition, 12 out of the 17 Spanish Autonomous Communities have their own autonomous public broadcasting corporations, functioning independently and being part of the Federation of Autonomous Radio and Television Organisations (FORTA).

According to Law 17/2006 regulating state-owned radio and television in Spain,¹³ the PSM *Corporación de Radio y Televisión Española* (RTVE) is required to establish a territorial structure for effective public service functions. This involves the establishment of a regional centre managed by RTVE in each of the 17 Autonomous Communities in Spain. These centres employ journalists dedicated to covering local and regional news.

Spain's public news agency, EFE, operates through delegations in the capitals of the 17 Autonomous Communities, Ceuta, and Melilla. Several Autonomous Communities have multiple delegations, ensuring the presence of local and regional correspondents in smaller cities across the country.

The map you can find at the [following link](#) refers to the number of local digital media in Spain in 2022. The original data source for this visualisation is Ramón Salaverría, María-Pilar Martínez-Costa, Samuel Negro, Miguel Paisana, & Miguel Crespo. (2022). IBERIFIER Digital Media Dataset (1.1.0) [Data set]. Zenodo. and you can access it [here](#).

Market and reach – Medium risk (48%)

Regional and local television companies' revenues have increased in a vast majority of the companies.¹⁴ In 2021, the total revenues of public radio-TV organisations reached 2,293.5 million euros.¹⁵ In 2020, newspaper sales reached 355.6 million euros, with 38.17% unsold copies, and magazine sales 172.3 million euros, with 58.54% unsold copies.¹⁶

Despite some closures, there has been significant growth in online local media outlets. Recent data¹⁷ indicate the presence of 2,816 digital news media outlets in Spain. This suggests that the shutdowns of traditional local media have been partially compensated by the rise of online media. In contrast, local radio stations have shown more stability, while the impact of local TV station closures has been relatively limited.

Television remains a dominant force in terms of audience penetration, reaching 79.3% in 2022.¹⁸ Radio follows with 54.4%, and online radio has a share of 10.2%. Print and digital newspaper editions collectively attained a penetration rate of 41.8%, with a decline in the print edition and an increase in the digital edition. Magazines achieved a 30.3% penetration rate, with a notable audience for both print and digital versions.

12 Colegio Profesional de Periodistas de Andalucía, Situación de las profesiones de periodistas/comunicadores en el mercado de trabajo andaluz. Informe elaborado por el Observatorio Argos, del Servicio Andaluz de Empleo para el Colegio Profesional de Periodistas de Andalucía, 2020, <https://periodistasandalucia.es/wp-content/uploads/2020/12/informe-situacion-sector-periodistas-comunicadores-CPPA-ARGOS.pdf>; Col·legi de Periodistes de Catalunya, Memòria d'actuació 2022, 2023, pp.40-41, <https://www.periodistes.cat/sites/default/files/public/continguts/basic/assemblea-2023/documents/00-memoria-periodistes-2022-v5.pdf>.

13 BOE (Boletín Oficial del Estado), Ley 17/2006, de 5 de junio, de la radio y la televisión de titularidad estatal, 2006, <https://www.boe.es/buscar/act.php?id=BOE-A-2006-9958>.

14 European Audiovisual Observatory from data provided by the AMADEUS database, Regional and local television companies revenues, 2022.

15 European Audiovisual Observatory, Radio-TV licence fee and revenues per inhabitant of public radio-television companies in Europe (2021), 2022.

16 FANDE (Federación de Asociaciones Nacionales de Distribuidores de Ediciones), European Press Distribution Benchmark, 2021.

17 M. Negreira-Rey, J. Vázquez-Herrero and X. López-García, No People, No News: News Deserts and Areas at Risk in Spain, *Media and Communication*, 11(3) (2023), pp. 293-303, <https://doi.org/10.17645/mac.v11i3.6727>.

18 Asociación para la Investigación de Medios de Comunicación (AIMC), Marco General de los Medios en España 2023, 2023, https://www.aimc.es/a1mc-c0nt3nt/uploads/2023/02/Marco_General_Medios_2023.pdf.

The press landscape in Spain has witnessed substantial changes in recent years, with a 24% decline in the number of press points of sale (PoS) between 2018 and 2021.¹⁹

Financial support from media subsidies is essential for supporting regional and local media, with the responsibility largely falling on Autonomous Communities. The distribution of media subsidies shows a declining trend from 2018 to 2020,²⁰ with the press sector receiving the largest share. Calls for media aid are present in nine Autonomous Communities.

State institutional advertising is regulated by Law 29/2005,²¹ coexisting with regional laws in various Autonomous Communities. Studies conducted on institutional advertising policies shed light on the funding dynamics, with press outlets dominating the investment, despite a decline in press consumption.²²

In 2022, the advertising market witnessed an estimated real investment of 12,214.2 million euros, marking a 4.7% growth from the previous year.²³ The digital sector continued its dominance, comprising 46.9% of the total volume and experiencing a 7.6% growth. Television, ranking second with a 30.4% share, faced a 3.3% decline in investment at 1,731.8 million euros, unlike other media that saw an increase. Within television, regional channels saw a 4.9% growth to 92.5 million euros, while local televisions rose by 0.5% to 2.3 million euros. Radio secured the third position, with a 7.7% growth to 447.2 million euros. Newspapers, representing 6% of the total market, increased their advertising investment by 1.2% to 340 million euros compared to 2021.

The enactment of Law 13/2022²⁴ has brought changes to the community media landscape, recognising its importance in promoting media pluralism. However, community media, particularly free and community radios, face economic, organisational, and legal precarity. The risk level for trends in community media revenue is, therefore, high. While some have thrived, the overall support for community media remains lacking, with international organisations highlighting the need for effective measures in Spanish legislation.

The Digital News Report 2023 indicates that a majority of internet users in Spain find local information relevant. Despite a concentration of paid news in national and regional newspapers, subscriptions to regional and local titles have increased from 5% in 2022²⁵ to 9% in 2023. Digital news payments are prevalent, with 13% of Spaniards paying for online news.

Local media outlets, both offline and online, have consistently maintained a stable weekly reach.²⁶ In the offline realm, public TV/radio news achieves a 17% reach, newspapers 14%, and private TV/radio news 11%. Meanwhile, in the online domain, newspapers secure a 12% reach, public TV/radio news 10%, and private TV/radio news 8%.

19 Asociación Nacional de Distribuidores de Publicaciones (ANDP), Evolución del número de puntos de venta de publicaciones periódicas en España. 2020-2021, 2022.

20 G. Aguado-Guadalupe and J.J. Blasco-Gil, Regional public subsidies for the media in Spain: amounts, beneficiaries and impact on income statements, *Communication & Society*, 36(1) (2023), 81-93, <https://doi.org/10.15581/003.36.1.81-93>.

21 BOE (Boletín Oficial del Estado), Ley 29/2005, de 29 de diciembre, de Publicidad y Comunicación Institucional, 2005, <https://www.boe.es/buscar/pdf/2005/BOE-A-2005-21524-consolidado.pdf>.

22 G. Aguado-Guadalupe and J.J. Blasco-Gil, Regional public subsidies for the media in Spain, pp. 81-93. See also: B. Galletero-Campos, La publicidad institucional y la sombra de la discrecionalidad: regulación, inversión en medios y control parlamentario en Castilla y León, *Derecom*, 33 (2022), pp. 137-160, <http://www.derecom.com/secciones/articulos-de-fondo/item/487-la-publicidad-institucional-y-la-sombra-de-la-discrecionalidad-regulacion-inversion-en-medios-y-control-parlamentario-en-castilla-y-leon>.

23 Resumen, InfoAdex, Estudio InfoAdex de la inversión publicitaria en España 2023, 2023, <https://www.infoadex.es/home/wp-content/uploads/2023/02/Resumen-Estudio-InfoAdex-2023.pdf>.

24 BOE (Boletín Oficial del Estado), Ley 13/2022, de 7 de julio, General de Comunicación Audiovisual, 2022, <https://www.boe.es/buscar/act.php?id=BOE-A-2022-11311>.

25 N. Newman, R. Fletcher, C. T. Robertson, K. Eddy and R. Kleis Nielsen, Reuters Institute Digital News Report 2022, 2022, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2022-06/Digital_News_Report_2022.pdf.

26 N. Newman, R. Fletcher, C. T. Robertson, K. Eddy and R. Kleis-Nielsen, Reuters Institute Digital News Report 2023, 2023, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf.

Safety of local journalists – Medium risk (54%)

In general terms, all the benefits exist for journalists, as for other workers in Spain. Official data²⁷ indicate that the unemployment rate among journalists has once again decreased by 17% in 2022, reaching its lowest point since the 2008 crisis. However, 61% of journalists claim to work more than 40 hours per week. Nearly one-third of employed journalists earn less than 1,450 euros per month; for freelancers, the figure rises to 50% earning less than 1,500 euros per month. Though this data does not refer only to local media, the numbers can be illustrative also of the situation at the local level.

When asked about the main problems affecting their profession, journalists still place at the top of the list low wages, unemployment and consequent job insecurity. Added to this, journalists mention the lack of politically and economically independent media and the increasing workload that prevents them from producing good information.

The primary issue confronting freelance or self-employed journalists lies in their earned income and the absence of a suitable labour framework that meets their needs. Every year, more journalists opt to register as self-employed and work as freelance journalists.²⁸ The count has surpassed 73,500 professionals, and data from the last five years indicates a rising trend in the population of self-employed journalists. 69% of self-employed journalists choose this option out of necessity, while 31% declared themselves self-employed voluntarily.

There have been several cases of attacks or threats to the physical safety of journalists and an increasing trend over recent years. In 2023, Mapping Media Freedom²⁹ recorded 13 alerts for physical assaults and 24 alerts for verbal attacks, indicating an increase compared to the last five years.

There are currently fifty journalists' associations aimed at ensuring editorial independence and respecting professional standards. These associations are primarily at the provincial level, although some are specific to municipalities or regions. While prominent professional associations such as the Federation of the Press Associations of Spain (FAPE) and the Association of Journalists of Catalonia advocate for journalists' impartiality and adherence to ethical codes, their effectiveness in ensuring editorial independence and ethical standards is constrained.

Locally, there have been some cases of SLAPP directly linked to the practice of journalism, although the tendency is not high. In this regard, local media outlets are equally vulnerable to such threats.

Editorial independence – Medium risk (50%)

Political control over media in Spain does not exist through direct or indirect ownership of the media at regional and local level. However, this does not imply the absence of political influence, as it can manifest through institutional advertising and subsidies, and the granting of licences.

General criteria for the distribution of direct subsidies are usually public, transparent, and objectified. Competition between applicants is the predominant system in the subsidy distribution method. In six out of the nine Autonomous Communities, the allocated budget was distributed among the recipients based on objective and regulated criteria, with scores determining the proportion of funding. There is a divergence, though, in budget allocations³⁰.

27 Asociación de la Prensa de Madrid, Informe Anual de la Profesión Periodística 2022, 2022, https://www.apmadrid.es/wp-content/uploads/2023/11/Informe-Anual-22_web_lite.pdf.

28 C. Puerta, Una conversación sobre periodismo 'freelance' y su sostenibilidad, *Cuadernos de Periodistas*, 44 (2022), <https://www.cuadernosdeperiodistas.com/una-conversacion-sobre-periodismo-freelance-y-su-sostenibilidad/>.

29 Mapping Media Freedom, <https://www.mappingmediafreedom.org/>.

30 G. Aguado-Guadalupe and J.J. Blasco-Gil, Regional public subsidies for the media in Spain: amounts, beneficiaries and impact on income statements, *Communication & Society*, 36(1) (2023), pp. 81-93, <https://doi.org/10.15581/003.36.1.81-93>.

The legal framework, primarily governed by Law 29/2005,³¹ seeks to ensure transparency and objectivity in the allocation of advertising resources for institutional communication and campaigns. However, the absence of specific provisions in Law 19/2014 on Transparency and Good Governance³² regarding institutional advertising has created a lack of clarity. This opacity raises concerns about transparency and gives rise to allegations of discretionary allocation practices when utilising public funds for such purposes.³³

The prevailing perception in Spain is that the majority, if not all, of the media outlets prioritise their commercial interests (56%) or political interests (53%) over the general welfare.³⁴ In 2022, only 24% of hired journalists and 22% of freelancers reported no pressure while preparing their information.³⁵ Additionally, the data shows that 46% of hired professionals and 53% of freelancers have occasionally faced pressures. A majority, 54% of hired journalists and 58% of freelancers, attribute these pressures to their media managers, while 22% of hired journalists and 44% of freelancers identify economic agents or their press departments as sources of pressure.

Journalists attribute pressures primarily to the specific interests of the company, cited by 37% of hired journalists and 44% of freelancers, with economic interests ranking as the second major motivation.

The National Commission of Markets and Competition (CNMC), appointed by the Executive, is Spain's main regulatory authority. Spain lacks a national audio-visual council, unlike other EU countries. Instead, regional audio-visual councils, such as Catalonia, Andalusia, the Balearic Islands, and the Valencian Community, oversee the audio-visual sector within their regions. These councils ensure regulatory compliance, promote diversity, and protect user rights independently.

Different cases of political influence need to be pointed out in the practice of PSM.³⁶ The existing mechanisms fall short in preventing political interference in the appointment and dismissal of editors-in-chief in both public and private media.

While local media outlets offer a wide range of stories, it is important to acknowledge that the diversity of viewpoints and tone can sometimes be limited. There do exist legal prescriptions and the necessary mechanisms for the proper implementation of the law aimed at impartiality in news and informative programmes on PSM channels and services. But these legal prescriptions are not implemented effectively.³⁷

The diversity of private channels in Spain ensures a certain level of external pluralism, despite commercial and political influences over editorial content. After all, the media environment is pluralistic with a variety of commercial and public television and radio channels, as well as newspapers and internet portals. However, for what pertains the coverage of political parties during election campaigns, some reports state that proportionality and plurality are not observed by private media and sometimes by the PSM: this was the case - for example- in Catalonia.³⁸

31 BOE (Boletín Oficial del Estado), Ley 29/2005, de 29 de diciembre, de Publicidad y Comunicación Institucional, 2005, <https://www.boe.es/buscar/pdf/2005/BOE-A-2005-21524-consolidado.pdf>.

32 BOE (Boletín Oficial del Estado), Ley 19/2014, de 29 de diciembre, de transparencia, acceso a la información pública y buen gobierno, 2014, <https://www.boe.es/buscar/pdf/2015/BOE-A-2015-470-consolidado.pdf>.

33 R. Magallón Rosa, La publicidad institucional de la Comunidad de Madrid. Evolución de su transparencia y rendición de cuentas, *Derecom*, 33 (2022), pp. 113-135, <http://www.derecom.com/secciones/articulos-de-fondo/item/485-la-publicidad-institucional-de-la-comunidad-de-madrid-evolucion-de-su-transparencia-y-rendicion-de-cuentas>.

34 A. Vara Miguel, 'La independencia de los medios españoles ante los grupos de presión, bajo sospecha, Digital News Report España 2022, 2022, <https://www.digitalnewsreport.es/2022/la-independencia-de-los-medios-espanoles-ante-los-grupos-de-presion-bajo-sospecha/>.

35 Informe Anual de la Profesión Periodística 2022, 2022.

36 E.C., Trabajadores de Canal Sur elaboran un informe con 130 ejemplos de manipulación en los informativos, *La Voz del Sur*, 2022, https://www.lavozdelsur.es/actualidad/politica/trabajadores-canal-sur-elaboran-informe-con-130-ejemplos-manipulacion-en-informativos_283881_102.html; Cadena SER, Los trabajadores de RTVCYL denuncian "manipulación" en su información política, 2022, <https://cadenaser.com/castillayleon/2022/09/22/los-trabajadores-de-rtvcyl-denuncian-manipulacion-en-su-informacion-politica-radio-valladolid/>; S.R., Trabajadores y colectivos sociales se manifiestan contra el "secuestro" de la radiotelevisión gallega por parte de la Xunta, 2022, <https://elpais.com/television/2022-11-06/trabajadores-y-colectivos-sociales-se-manifiestan-contr-el-secuestro-de-la-radiotelevision-gallega-por-parte-de-la-xunta.html>.

37 Europa Press, Nueve de 16 televisiones locales públicas andaluzas aumentan el tiempo dedicado a gobiernos municipales, según el CAA, 2022, <https://www.europapress.es/esandalucia/sevilla/noticia-nueve-16-televisiones-locales-publicas-andaluzas-aumentan-tiempo-dedicado-gobiernos-municipales-cao-20220321130922.html>.

38 Consell Audiovisual de Catalunya, Acuerdo 22/2021 de aprobación del Informe específico de pluralismo en la televisión y en la radio durante la campaña de las elecciones al Parlament de Catalunya 2021 (del 29 de enero al 12 de febrero), 2021, <https://www.cac.cat/es/documentacio/acuerdo-222021-aprobacion-del-informe-especifico-pluralismo-la-television-y-la-radio>.

Social inclusiveness – Medium risk (46%)

Local and regional radio and television stations broadcasting in languages other than Spanish are the main exception. Law 17/2006,³⁹ established on June 5th, regulates radio and television ownership. This law focuses on the structure of RTVE, mandating that regional disconnections in centres within Autonomous Communities with distinct languages be conducted in that respective language. Accordingly, regional centres in Autonomous Communities like the Balearic Islands, Galicia, Catalonia, the Basque Country, Navarra, and Valencia follow this provision, offering language-specific programming, including news broadcasts.

Despite the absence of legally recognised minorities in Spain, minorities do usually have some access to airtime in local newsrooms. The main issue lies in the fact that this access is often not proportional to their population size in the country.

Concerns have been raised regarding the way the Spanish media address critical issues related to migration.⁴⁰ Particularly highlighted is the treatment of child immigrants, with the prevalent use of the acronym MENA, prioritising migratory status over childhood, contributing to biased representation in the Spanish media.

Community radios have served as crucial spaces for citizen engagement and expression since the inception of democracy. In addition to being a platform for different sectors and showcasing realities overlooked by mainstream media, they have played a significant role as community-building tools⁴¹ for marginalised groups. They have facilitated community events, partnered with local organisations, and acted as catalysts for social and cultural life within their neighbourhoods. For instance, OMC Radio, based in Madrid's low income neighbourhood of Villaverde, is producing programmes for marginalised communities, such as people with mental health issues.⁴² These stations address specific community needs, including offering access to various youth groups and collaborating with educational and social service centres.

Approximately 75% of Spaniards rely on local journalistic sources for their news,⁴³ and 63% have a high level of interest in local and regional news.⁴⁴ However, this interest decreases to 34% among individuals between the ages of 18 and 24. Newspapers and their online platforms serve as the primary outlet for local news across all age ranges, accounting for 47% of respondents, while television and digital media follow closely behind with 39%.⁴⁵ Local information is avoided by only a small percentage of the population (7%), suggesting a sustained interest in current events within the community. The credibility of regional or local newspapers increased from 46% in 2022 to 52% in 2023. Notably, local and regional media are perceived as the most credible sources.⁴⁶

The presence of local and hyperlocal⁴⁷ media in Spain is substantial. In 2018, these types of publications constituted more than 70% of the country's online media, indicating a strong focus on proximity through the internet and mobile devices.⁴⁸ The advent of digital technologies has led to a noticeable resurgence of interest in local and regional news over the last two decades.

39 BOE (Boletín Oficial del Estado), Ley 17/2006, de 5 de junio, de la radio y la televisión de titularidad estatal, 2006, <https://www.boe.es/buscar/act.php?id=BOE-A-2006-9958>.

40 Red Acoge, Informe Inmigracionalismo 2021. Tratamiento mediático de las migraciones en España, 2021, https://inmigracionalismo.es/wp-content/uploads/2021/11/Informe_Inmigracionalismo_2021.pdf.

41 J. García, Transformaciones y aprendizajes de las radios comunitarias en España: hacia un modelo de radio inclusiva, Anuario Electrónico de Estudios en Comunicación Social "Disertaciones", 10(1) (2017), pp. 30-41, <https://www.redalyc.org/journal/5115/511552608003/html/>.

42 OMC Radio, 2023, <https://www.omcradio.org/inicio/omc-radio/nosotros/>.

43 S. Negrodo, A. Amoedo, A. Vara, E. Moreno and J. Kaufmann, Digital News Report España 2020 Pamplona: Servicio de Publicaciones de la Universidad de Navarra, 2020, <https://doi.org/10.15581/019.002>.

44 A. Vara, A. Amoedo, E. Moreno, S. Negrodo and J. Kaufmann, Digital News Report España 2022 Pamplona: Servicio de Publicaciones de la Universidad de Navarra, 2022, <https://doi.org/10.15581/019.2022>.

45 Vara, Amoedo, Moreno, Negrodo, Kaufmann, Digital News Report España 2022.

46 A. Amoedo, E. Moreno, S. Negrodo, J. Kaufmann and A. Vara, Digital News Report España 2023 Pamplona: Servicio de Publicaciones de la Universidad de Navarra, 2023, <https://doi.org/10.15581/019.2023>.

47 The term 'hyperlocal' is associated with media or publications that are specifically focused on a particular neighbourhood or district.

48 R. Rivas-de-Roca, Los medios locales y la rentabilidad. Estudio de casos digitales en Europa, in: P. Sidorenko, J.M. Herranz de la Casa, R. Terol, R. and N. Alonso, eds., *Narrativas emergentes para la comunicación digital* (Madrid: Dykinson, 2022), 607-623, <https://idus.us.es/handle/11441/142106>.

Best practices and open public sphere

There are some societal initiatives to tackle the problem posed by the decline of local and community news provision. AMIC Media,⁴⁹ established in 1997, brings together 532 media outlets in Catalonia, including 140 free press titles, 54 paid press titles, and 338 digital media platforms. It serves the collective interests of its members. Another significant initiative is L'APPEC,⁵⁰ founded in 1983, a non-profit organisation uniting publisher of Catalan-language magazines, with over 230 associated publications and digital media. Also, the *Red de Medios Comunitarios* (ReMC)⁵¹ plays a key role in uniting and defending diverse media, initiatives, and citizen communication practices within Spain's Third Sector of Communication. Since 2005, ReMC has fostered partnerships to empower marginalised groups through community media outlets.

Moreover, Spain hosts 27 citizens or civil society initiatives, including Newtral,⁵² specialising in audio-visual production, fact-checking, and new narratives; the digital news site *elDiario.es*,⁵³ Civio,⁵⁴ a non-profit focusing on transparency in public information, and the slow journalism magazine *Revista 5W*,⁵⁵ as listed in the media directory of Project Oasis.

49 AMIC, Associació de Mitjans d'Informació i Comunicació, 2023, <https://www.amic.media/>.

50 APPEC (Associació de Publicacions Periòdiques en Català), 2023, <https://www.lesrevistes.cat/>.

51 ReMC (Red de Medios Comunitarios), 2023, <https://medioscomunitarios.net/>.

52 Newtral, 2023, www.newtral.es.

53 elDiario.es, 2023, www.eldiario.es.

54 Civio, 2023, www.civio.es.

55 Revista 5W, 2023, www.revista5w.com.



Sweden

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Context

The debate on news deserts and local media deserts in Sweden can be traced back to 2002, with a study on the impact of local media in Stockholm and its suburbs.¹ The study found that local news coverage was insufficient and even absent in the suburbs, and named this phenomena “*medieskugga*”, which translates to media shadow in English. Today, this phenomenon has spread all over the country in different forms. The most affected areas are smaller cities and communities in the countryside where the traditional established regional press has reduced its presence, reducing the number of local newsrooms and reporters.

Lately, the problem of local news deserts has come up on the agenda. And yet, there is still no sufficient public debate concerning news deserts and local media in Sweden. There are, however, debates on two issues connected with the future of local media. One concerns press support, which will be modified in 2024.² Another is the inadequate funding in 2023, marked by reduced advertising, readers and media users, which has resulted in serious cuts to both content and reporters³. One example is public television where some TV programmes have been withdrawn and numbers of journalists given notice.

In Sweden, the representation of community media can be found in established local media and what can be referred to as hyperlocals. Hyperlocal media outlets have developed in the last ten years and are often partially replacing mainstream local media in news desert areas.^{4,5} Such media stems from the strong community engagement of local media entrepreneurs. In their role as journalists, many of them see themselves as traditional news reporters, focused on the fundamental aspects that journalism is expected to encompass such as performing qualitative journalism, and addressing current issues that affect the local population in the area they cover.⁶

1 Lars Nord, Mid Sweden University and Gunnar Nygren Södertörn University in 2002: *Medieskugga*, Atlas, ISBN: 978-91-7389-108-0 www.bokforlagetatlas.se.

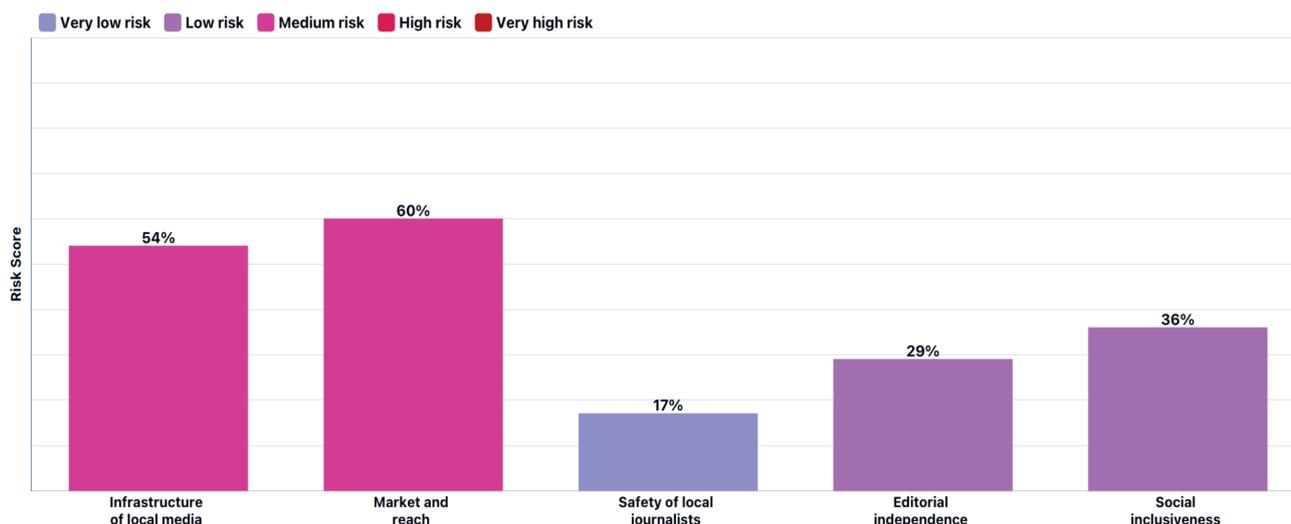
2 Statliga Mediestödsutredningen, 'Kulturdepartementet, regeringskansliet, 2023, https://www.riksdagen.se/sv/dokument-och-lagar/dokument/departementsserien/mediestodsutredningen-redovisar-i-denna_HAB414/.

3 *MedieSverige 2023*, Nordicom Gothenburg University, 2023. <https://www.nordicom.gu.se/sv/publikationer/mediesverige-2023>.

4 L. Jangdal, A. Cepaite Nilsson and E. Stúr, 'Hyperlocal Journalism and PR: Diversity in Roles and Interactions,' *Observatorio*, 13 (1), 2019, pp. 1646-5954.

5 G. Nygren, 'Journalistiken i det lokala samhället', *Handbok i journalistikforskning*, ed. M. Karlsson and J. Strömbäck, Lund: Studentlitteratur AB, 2019. pp.283-295.

6 L. Jangdal, A. Cepaite Nilsson and E. Stúr, E., 2019.



Granularity of infrastructure of local media- Medium risk (54%)

Local media services are present in rural, suburban and urban areas. However, a decline can be identified in the last ten years regarding rural areas and smaller cities, resulting in medium risk for the granularity of the local media infrastructure. Traditional local newspapers have been re-organised and are nowadays doing most of their news work at central newsrooms in the capital cities of the regions: while most local newspapers have survived, their content has become less locally focussed and is often reused within the conglomerates, and, thus, newspapers become less local as a result. The centralisation continues in order to save money, while at the same time, there is an awareness that readers expect local content. It is a difficult balancing act⁷.

Between 2017 and 2023, news desert areas, also called “blank spots”, have become more frequent but have somewhat ceased to expand over the last few years. Examining the country as a whole, it is evident that in the north of Sweden, there are more blank spots than in the South.⁸ There is mapping in the *Mediestudier* database,⁹ showing the development of blank spots in Sweden where municipalities lack local newsrooms.

In Sweden, the number of local reporters situated in rural areas and in small cities has decreased, along with local newsrooms. More than half of all local newsrooms have closed down, circa 35-40 % of local reporters have disappeared from the local media market, and most local reporters are nowadays based in centralised newsrooms in the capital or larger regional cities. Only occasionally do they leave the newsroom to report on bigger events in rural areas,¹⁰ which is why high risk was assigned for the presence of local reporters on the ground.

The map you can find at the [following link](#) refers to the number of local newsrooms in Sweden in 2023. The original data source for this visualisation is *Institutet för Mediestudier* and you can access it [here](#).

7 G. Nygren and C. Tenor, *Lokaljournalistik – nära nyheter I en global värld*, Lund: Studentlitteratur, 2020, p. 49.

8 “Mediestudier.” *Mediestudier*, 2021. <https://mediestudier.se/publikationer/mediestudiers-arsbok-2021>.

9 J. “Kommundatabasen,” n.d. <https://kommundatabas.mediastudier.se/>.

10 G. Nygren and C. Tenor, “Svenska trender 1986 - 2022”, SOM institutet Gothenburg University, <https://www.gu.se/som-institutet/resultat-och-publikationer>.

With regard to the presence of local branches and correspondents of PSM (Swedish Television (SVT) and Swedish Radio (SR)), a low-risk evaluation was assigned for the granularity of their infrastructure because newsrooms with local journalists are predominantly based in the main regional cities. Collectively, they cover every region and province in Sweden, and broadcast local news regularly, on a daily basis.¹¹ Concerning public service radio, there are 24 + 1 local radio stations, each of them covering one province/region in Sweden plus one covering Stockholm and its suburbs. However, the main Swedish news agency, *Tidningarnas Telegrambyrå*, (TT) – which mainly conducts desk journalism – does not keep correspondents in smaller cities and no longer has locally based newsrooms: their only venues are in Stockholm and in bigger cities such as Gothenburg and Malmö.¹²

Market and reach - Medium risk (60%)

There are signs of declining local and community media revenues, largely attributable to changing media consumption habits, among other things.¹³ In fact, according to “Svenska trender 1986-2022”, the consumption of local news in local papers and local broadcasting has declined from 78% to 61% between 1986 and 2022. By contrast, the consumption of news using social media has slightly increased in the last five years.¹⁴

Broadly speaking, the number of local outlets has declined in recent years, with larger media companies acquiring smaller ones, contributing to a less diverse media landscape.¹⁵ In this Report in 2022, 90 out of a total of 96 daily newspapers, consumed at a mid- to high-frequency level, were owned by one of the five largest news groups.

Swedes have a long tradition of subscribing to quality newspapers in print, both local and national.¹⁶ However, the decline of the market is also visible in a continuing decrease in the proportion of households subscribing to a daily newspaper. In recent years, the decline levelled off and a small increase was noticed in 2020.

The turnaround is also explained by a growing interest in digital newspaper subscriptions. For both the metropolitan and rural press, the digital reach and thus digital readership continues to become increasingly important. However, hyperlocal media outlets are financially vulnerable and usually not long-lived.¹⁷ The data on total weekly audience reach for daily newspapers (i.e. those who read a local newspaper once a week) in recent years (2015, 2020-22) show a slight increase from 83% in 2020 to 85% in 2022.¹⁸ The local media market in Sweden is, at the moment, rather stable. But reflecting on the past decade, there have been some significant changes. One of these is how the larger media houses have acquired and incorporated smaller local media companies. This has changed the Swedish media market from being diverse and pluralistic to a few major media owners dominating the market.¹⁹

The Swedish local media market is very concentrated (very high risk). In recent years, there has been consolidation in the local media market, resulting in a decrease in the number of local media companies, with large media companies such as *Bonniers*, *Norrköpings Tidningar*, *Gota Media*, and *Stampen* acquir-

11 Mediemyndigheten, "Regler för radio- och TV-sändningar", n.d. <https://mediemyndigheten.se/ansokan-och-registrering/regelverk/regler-for-radio-och-tv-sandningar/>

12 *Mediesverige 2023*; Nordicom, "Svensk medieutveckling | Nordicom," n.d. <https://www.nordicom.gu.se/sv/fakta-analys/svensk-medieutveckling>.

13 *Mediesverige 2023*; Nordicom, "Svensk medieutveckling | Nordicom," n.d. <https://www.nordicom.gu.se/sv/fakta-analys/svensk-medieutveckling>.

14 "Svenska trender 1986-2022" SOM institutet Gothenburg University <https://www.gu.se/som-institutet/resultat-och-publikationer>.

15 *Mediesverige 2023*; Nordicom, "Svensk medieutveckling | Nordicom," n.d. <https://www.nordicom.gu.se/sv/fakta-analys/svensk-medieutveckling>.

16 O. Westlund, Digital News Report 2022, <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/sweden>.

17 G. Nygren, 'Medieekologi - ett helhetsperspektiv på medieutveckling', In: 'Människorna, medierna och marknaden: Medieutredningens forskningsantologi om en demokrati i förändring', Stockholm: Wolters Kluwer. Statens offentliga utredningar, 2016, pp. 85-108, 2016.

18 Mediebarometern 2022. GU: Nordicom <https://www.mpr.se/globalassets/dokument/publikationer/medieutveckling/medieekonomi/medieekonomi-2022.pdf>.

19 *Mediesverige 2023* Nordicom Gothenburg University <https://www.nordicom.gu.se/sv/fakta-analys/svensk-medieutveckling>, 2023: *Mediesverige 2023*; <https://ju.se/portal/vertikals/blogs/jonkoping-international-business-school/bloggposter/2022-09-09-agarskap-och-politisk-vinkling-av-nyhetsmedia-den-svenska-tidningsmarknaden.html#:~:text=Men%20efter%20de%20senaste%20sammanlagningarna,dar%20Bonnier%20ar%20overlagset%20storst>.

ing smaller, local media outlets. For example, *Bonniers* now owns *Mittmedia* and *Hall Media*, gathered under the company *Bonniers News Local*. The latter also cooperate with *Gota Media*, thus contributing to a further consolidation of the local media market.^{20 21}

The distribution of both national and local press has decreased over the past five years, especially in the countryside where people depend most on the national postal delivery. In recent years, the delivery procedures have changed from five days a week to sometimes once a week. This development has affected the whole distribution chain, resulting in fewer people being involved in distributing and selling papers; at the same time, the number of points of sales has declined.²²

National public service radio and TV are financed by taxes. The economy of public service has undergone some reductions which has affected the organisation of SR and SVT and also the support/financing of local media within the organisation – both concerning content production – leading to a decreasing number of employees.²³

While local media outlets have access to state support in the form of subsidies handed out by "*Mediestödsnämnden*" (Media Support Board), they have been decreasing in recent years, particularly for the TV, press and radio sectors. However, action was taken in November 2023, when the Swedish parliament, the Riksdag, authorised a new package of media subsidies designed to target media outlets in underserved areas (commonly referred to as "white spots" or "*Vita fläckar-stödet*" in Swedish) (Sverige Riksdag, 2022). This law went into effect on 1 January 2024. The new press subsidy is supposed to support local media, but several media owners, as well as journalists, have expressed their concerns that it will be counterproductive, forecasting that there will be fewer print media in the future.²⁴

There has been a sharp decrease in commercial advertising revenue for local media in recent years (high risk). This is a critical development, states Professor Ingela Wadbring, who was interviewed for this research.²⁵ According to *Mediesverige 2023*, the biggest loss of investment concerns the daily print press. Between 2005 and 2021, the investment in commercial advertising declined from 8.3 to 1.7 billion Swedish krona (SEK). This affects the economy of the local press, which is heavily dependent on income from advertising.²⁶

The willingness to pay for local news has been assessed as medium risk. Despite evidence of declining subscriptions for print media (5% decline in 2021), this has been partially compensated by evidence of increasing subscriptions to online news. Subscriptions for print media were reported to be declining in 2021²⁷, however, based on the latest Reuters Digital News Report²⁸, 33% of people in Sweden are willing to pay for online news, which represents one of the highest results in this research. Payment is required to access PSM news, which being public TV and radio, is financed mainly through taxes.

Safety of local journalists - Very low risk (17%)

The working conditions of employed local journalists are regulated by agreements made between the journalists' trade union (*Svenska Journalistförbundet* - SJF)²⁹ and media outlets. Therefore, employed members of the union have acceptable working conditions in terms of labour rights, including minimum rates of pay and access to social security benefits. In the last few years, there has been a drop in the

20 Mediekartan över den Svenska mediemarknaden 2022, <https://www.mprt.se/medieutveckling/>.

21 Mediesverige, 2023, <https://www.nordicom.gu.se/sv/publikationer/mediesverige-2023>.

22 Mediesverige 2023 Nordicom Gothenburg University <https://www.nordicom.gu.se/sv/fakta-analys/svensk-medieutveckling>.

23 Årsredovisning Sveriges Radio Förvaltnings AB, 2022, <https://www.srf.se/wp-content/uploads/2022/06/Årsredovisning-SRF-210101-211231-slutversion.pdf>; <https://www.mprt.se/medieutveckling/>.

24 Dagens Nyheter, Kulturnyheter: Journalistik, 2023-12-24

25 Professor Ingela Wadbring, interview conducted on 21.06.2023.

26 Interview with professor Ingela Wadbring on 21.06.2023; Nordicom Gothenburg University <https://www.nordicom.gu.se/sv/publikationer/mediesverige-2023>.

27 Reuters Institute Digital News Report: Sweden. 2022. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/sweden>

28 Reuters Institute Digital News Report: Sweden. 2023. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2023/sweden>

29 Journalist Kongressen Otryggheten i mediebranschen. Rapport 1-6 av Kent Werne. 2018. https://www.sjf.se/system/files/2018-08/otryggheten_i_mediebranschen_-_rapport_1-6_av_kent_werne.pdf

number of permanent employment contracts among local news reporters, with a decrease in the regular staff reports, as local media outlets have opted for temporary contracts, which usually offer lower salaries. Working conditions of freelancers vary and depend on what kind of agreement they have with the agency/media outlet they are working for. Those who have a particular agreement/assignment may have the same conditions as employed journalists. There are general agreements concerning freelancers, which comprise issues such as average salary, social security protection and working hours, but this depends on the agreement with local media outlets. SJF negotiated a new agreement on working conditions in 2015, which has strengthened the working situation of freelancers in the country.³⁰

Attacks and threats to the physical safety of journalists, including those online, have increased in the last 5 years. These attacks and threats often target designated journalists and can sometimes be politically initiated. The frequency of these attacks differs between national and local media journalists, where the latter are not as much affected as those working for national media.³¹

The problem of threats and intimidation against journalists has been addressed in an investigation by the SJF, launched in 2014 and completed in 2018. In the study, nearly 30% of all journalists in Sweden had been threatened over a period of 12 months in 2019, and 70% had received disrespectful comments.³² The SJF, which is a professional organisation as well as a trade union with approximately 13,700 members, is usually present at the local level when it comes to the organisation of professionally active journalists. Individuals applying for membership of the Union of Journalists enter into a contract with the union. This contract confers both rights and obligations – the members promise to comply with the union's statutes and code of professional ethics and not to damage the reputation of journalists as a professional body. Furthermore, the SJF negotiates locally on behalf of its members. "At the local level, it is the branches that negotiate on behalf of the members' rights and promote them."³³

The SFJ has guidelines on ethics and professional integrity, which are also part of the education curricula of journalists in Sweden at universities and other training programs.³⁴ Therefore there is awareness about these subjects among journalists and local media owners.

There have been SLAPP cases against local journalists, however they are rare: one example was the lawsuit against the on-line magazine *Realtid.se*, filed in London in 2020.³⁵

Editorial independence- Low risk (29%)

In Sweden, no law prevents political control which might be exerted through ownership. While this lack of regulatory safeguards might pose some concern, there is no evidence that parties or individual politicians, directly or through intermediaries, have any control over local media.

In terms of state subsidies, the Press support scheme was replaced in 2019 by the so-called Media support scheme. At the end of 2023, a new legislation replaced the old system where two different subsidies ("press" and "media") were provided.³⁶ The new legislation, in effect since January 2024, provides only one

30 *Ibid.*

31 *Ibid.*

32 *Ibid.*

33 See Svenska Journalistförbundet, "About the Swedish Union of Journalists", 2023. <https://www.sjf.se/about-us>.

34 See "Rules of Professional Conduct." Svenska Journalistförbundet, 2020. <https://www.sjf.se/yrkesfragor/yrkesetik/yrkesetiska-regler/rules-professional-conduct>.

35 "SLAPP Lawsuit Suing Swedish Online Magazine Realtid Filed in London - ARTICLE 19." ARTICLE 19, December 2020. <https://www.article19.org/resources/slapp-realtid-in-london/>.

36 Nordicom, Direkt mediestöd till nyhetsmedier – en nordisk översikt, 2022 <https://www.nordicom.gu.se/sv/fakta-analys/norden/faktablad/direkt-mediestod-till-nyhetsmedier-en-nordisk-oversikt>.

form of direct state subsidisation, which is technology and format neutral.³⁷ The new legislation has faced some criticism, specifically relating to the fact that it does not separate between national and local media, and thus pits them against each other, which critics fear will lead to a less diverse media landscape.³⁸

With regard to state advertising, authorities appear to be among the largest buyers of services from advertising agencies and communication consultants. However, no data is found when it comes to the fairness and transparency of the distribution of state advertising in the local media sphere.

Upon analysing the degree of commercial influence over editorial content, it appears that safeguards are in place. For example, the Swedish Association of Journalists has developed guidelines for journalists and editorial boards to follow, in order to maintain their credibility³⁹. Moreover, there is no evidence that would prove the attempts of commercial actors to influence editorial content of the local media.

In terms of editorial content and its independence from political influence, organisations such as *Sveriges Radio AB* (SR), *Swedish Journalistförbundet* (SJF) and *Tidningsutgivarna* (TU) as well as *Sveriges Tidsskrifter*, have developed a number of self-regulatory codes of conduct to establish editorial independence. Freedom of the press (SFS, 1949:105) and expression is guaranteed in the constitution, in the freedom of the press ordinance, and in the freedom of expression fundamental law. The Swedish Freedom of the Press Act specifically regulates independence when it comes to the appointments and dismissals of editors-in-chief⁴⁰. Regulation and self-regulation appear to be effective.

The authority for press, radio and television (MPRT) has approximately 40 employees divided into four units: Application, Supervision, Administration and Communication, and Environment. In addition, there are two boards, the Review Board (GRN) and the Media Support Board (MSN), as well as a Transparency Council. The two committees are independent decision-making bodies within the authority. While it does not have local branches, the authority has a remit over local media.

In Sweden, there are three public service companies: SVT (television), SR (radio) and UR (Education radio). In SVT, there is a part representing local TV and the same in SR, for local radio. No concern has been detected in this research when it comes to local branches. Regulatory safeguards exist⁴¹ and they are generally considered effective in preventing governmental or other forms of political influence. Following a recent change to the articles of association of SR, SVT and UR, members of their boards may not hold a party-political assignment, a practice that has already been established in the past.⁴²

Finally, there is the risk of reduced supply and reduced media diversity within the segment of Swedish news and local journalism (medium risk). There are fewer unique local news reports and more are produced using ready-made information from other actors, i.e., identical news published by several different publishers.⁴³

37 Law 2023:664 on media support: "Lag (2023:664) om mediestöd." Sveriges Riksdag, https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/lag-2023664-om-mediestod_sfs-2023-664/. Ordinance 2023:740: "Förordning (2023:740) om mediestöd." Sveriges Riksdag, https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/forordning-2023740-om-mediestod_sfs-2023-740/.

38 Svt, Trots massiv kritik – nytt mediestöd på gång, 2023, <https://www.svt.se/kultur/trots-massiv-kritik-nytt-mediestod-pa-gang-joq13w>.

39 Svenska Journalistförbundet, 2023, <https://www.sjf.se/yrkesfragor/yrkesetik/spelregler-press-radio-och-tv/riktlinjer-mot-textreklam>.

40 Freedom of the press law (2018:1801) "Tryckfrihetsförordning (1949:105) (TF) | Lagen.Nu," <https://lagen.nu/1949:105>; Freedom of expression fundamental law (1991:1469) "Yttrandefrihetsgrundlag (1991:1469)." Sveriges Riksdag, https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/yttrandefrihetsgrundlag-19911469_sfs-1991-1469/. Sveriges Riksdag: "Fria och oberoende medier (Motion 2004/05:K227 av Göran Lennmarker m.fl. (m))." Sveriges Riksdag, https://www.riksdagen.se/sv/dokument-och-lagar/dokument/motion/fria-och-oberoende-media_GS02K227/.

41 Public service is protected, like all media, from state influence at the editorial level through, among other things, the Freedom of Expression Act (chap. 3 § 6), which prevents the state from interfering in individual programmes. "Sök mediestöd 2024." Mediemyndigheten.se, <https://www.mprt.se/stod-till-medier/allmant-om-stod-till-nyhetsmedier/>.

42 Regeringen och Regeringskansliet. "Regeringen säkerställer public service-företagens oberoende från partipolitik." Regeringskansliet, 2023. <https://www.regeringen.se/pressmeddelanden/2023/10/regeringen-sakerstaller-public-service-foretagens-oberoende-fran-partipolitik/>.

43 G. Nygren and C. Tenor, *Lokaljournalistik – nära nyheter i en global värld*, Lund: Studentlitteratur, 2020.

Social inclusiveness - Low risk (36%)

The PSM, SVT, has a prominent role in broadcasting in minority languages in Sweden. News programmes in Finnish and Sami have existed for a long time, and efforts have been invested to further strengthen and broaden the news offering.⁴⁴ Sweden scores low risk for representation of minorities in the media in the latest Media Pluralism Monitor report.⁴⁵ *Sveriges Radio's* mission includes having a range in national minority languages such as Finnish, Sami, Meänkieli, Romani Chib and Yiddish.⁴⁶

When it comes to local media providing sufficient public interest news, the risk has been assessed as medium. Studies conducting news content analysis show that, compared to 2007, news on politics, social issues and also lifestyle has increased, while crime, sports, culture and the environment decreased in 2018.⁴⁷ Research on hyperlocal media states that these media in Sweden “offer a diverse range of topics, providing inhabitants with a wide variety of information about what is happening in their communities, and with a clear emphasis on local material as opposed to regional or national material.”⁴⁸

Physical proximity to their readers and local reporters' visibility and anchoring in local society is a prerequisite for building relationships between a newspaper and its audience. In Sweden, some local media outlets, both mainstream and hyperlocal, engage directly with their audience, by being present in the local community and having contact with local people. Unfortunately, there is also a risk that local media outlets could lose this connection through lack of financial and human resources, moving to centralised content production as well as desk-bound news production.⁴⁹

Best practices and open public sphere

An example of best practices in community media is the phenomenon of hyperlocals. There are about 75 hyperlocals spread all over the country.⁵⁰ Most of them are initiated by former local journalists or people with a journalistic interest in producing local news. They function as local news entrepreneurs whilst setting up news media outlets in places which the ordinary local media has ceased to cover.⁵¹

In terms of innovation in local news, one successful example is that of *Horisont*, a news magazine which covers the Island of Gotland. It is produced both on print and online and is mainly financed by subscriptions, advertising and sponsorship. The editor is a former news reporter who worked on one of the island's local newspapers.⁵² Another successful example of hyperlocal news media is *MAGAZIN 24*, situated in the small Swedish town of Köping: The editors have, in recent years, changed the content and appearance on the local media market by making the print and web edition more local news oriented and thus improving the accessibility for their readers. It has, therefore, become the most important source of local news in the area it covers. To deliver this, they receive financial support from the government and local stakeholders.⁵³

44 Regeringen, 2023 <https://www.regeringen.se/contentassets/50fcc2ac408d46b4a919cdf7e53006cb/sveriges-television-ab.pdf>

45 M. A. Färdigh, 'Monitoring media pluralism in the digital era : application of the media pluralism monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2022. Country report : Sweden' ,EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2023, <https://hdl.handle.net/1814/75740>

46 Utbildningsradion, UR 2023, <https://kontakt.ur.se/guide/modersmal-minoritetssprak>.

47 Karlsson and Färm, 'Från brott till sociala frågor – förändring av nyhetsämnen', In: Mediestudiers innehållsanalys 2007-2018, Michael Karlsson (red), Lars Truedson (red). Institutet för mediestudier, 2018.

48 L. Jangdal, 'Hyperlocals Matter: Prioritising Politics When Others Don't,' *Journalism Practice*, vol. 15, no. 4, 2021, p. 450.

49 E. Stur, A. Cepaite-Nilsson and L. Jangdal (2018), "Hyperlocal Journalism and PR: Diversity in Roles and Interactions", *Observatorio (Obs*) Journal* , Vol 12, number 4, 2018, pp. 087 – 106

50 Entrepreneurship and hyperlocals in the countryside, series of studies of hyperlocals in Sweden 2016-2020.

51 L. Jangdaal , 2022, 'Hype or hope?' The Democratic Values of Swedish Hyperlocals in the Media Ecology : Mid Sweden University;The Democracies Values in the Media Ecology,' Mittuniversitetet, 2022.

52 Interview with Christer Böhle, editor of *Horisont*, 2022.

53 Magazin 24, Köping, 2024, <https://magazin24.se/koping>.



The Netherlands

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Context

There is a rich variety of local media outlets in the Netherlands, including regional and local TV and radio broadcasters, regional and local newspapers, local weeklies and online hyperlocal sites¹. However, over the past decade, policymakers, academics and journalistic organisations have voiced their concern about the state of local journalism. Several studies have concluded that while at first sight there are enough local and regional media that people can choose from, a closer look shows that many news organisations are struggling financially and have difficulties in providing quality journalism and reaching a diverse public.²

The local media landscape in the Netherlands is geographically focused. There is little attention paid to specific community media. However, historically local public broadcasters started as community media. While local public broadcasters clearly focused on specific local regions, their goal was and is to connect citizens and for citizens to participate in making stories from within society. Currently, there is no policy specifically facilitating community media.

The debate on the state of local journalism is not an easy one and concerns a difficult interplay between local news media, regional news organisations and (local) government. Three issues are at stake:

The main challenge is that the available budget for local journalism is not sufficient to fulfil journalistic functions and to produce professional productions. In recent years, the national government has increased funding for local journalism and investigative journalism. A recent study shows that most of the local public broadcasters, the local weeklies and the hyperlocal organisations hardly have the infrastructure, organisation and professional routines to do investigative journalism. First and foremost is the issue of professionalisation of local newsrooms and the transition to a digital newsroom³.

Second, the funding for local public broadcasters will increase in the coming years, but the national government also wants to shift the responsibility of the yearly funding from local to national government so that local media can operate independently from local governments. However, the latter believe this is not beneficial for the collaboration between local governments and local public broadcasters.

1 Hyperlocals are defined as online media that cover the news of a specific municipality. They are stand-alone websites, not linked to local newspapers or local broadcasters. See M.C. Negreira-Rey, Y. De Haan, R. van den Broek (2023), Boundaries of Hyperlocal Journalism: Geographical Borders, Roles and Relationships with the Audience in Spain and the Netherlands. In *Blurring Boundaries of Journalism in Digital Media: New Actors, Models and Practices*, pp. 81-88. Springer Nature.

2 P. Bakker & Q. Kik, "Op het tweede gezicht: regionale en lokale media en journalistiek 2000-2017, 2018" <https://zoek.officielebekendmakingen.nl/blg-846876.pdf>,

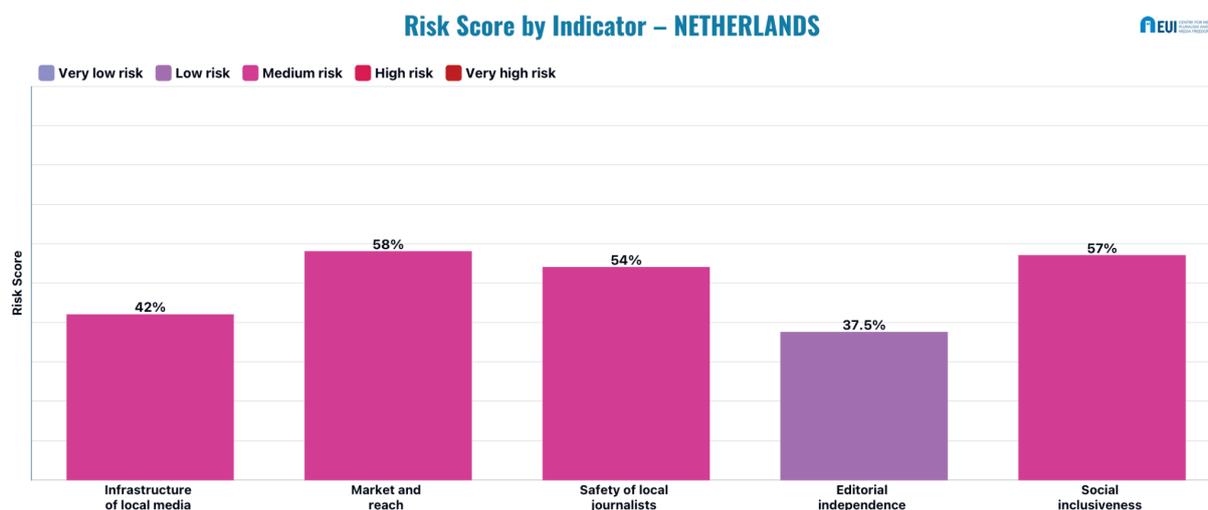
3 Ministerie OCW, *Visiebrief Lokale Omroepen*, 2023, <https://open.overheid.nl/documenten/ronl-c189161df82bdae4dc36fcaeae1feaf6814e427d/pdf>

Third, while the funding for local public broadcasting is increasing, local private media feel deprived as the funding is now focused on public local broadcasters, failing to stimulate a balanced local media landscape⁴.

Lastly, the question is what is local and what is regional? What are the geographical boundaries of specific media and how can local and regional media collaborate?

Concluding, in the Netherlands there is a concern about news deserts, relating to the number of outlets and even more so, to the quality of local news and the professionalisation of newsrooms. While the funding for local journalism has increased, this leads to conflicting interests.

Below, different aspects of the local media landscape are discussed with risk indicators visualised in the bar chart.



Granularity of infrastructure of local media - Medium risk (42%)

The Netherlands comprises 342 different municipalities. Over a period of ten years, there has been a shift in the presence of local media on the ground. Especially for the press, there has been a decrease in the average number of titles: from 1.8 to 1.4 print local news outlets per municipality. In contrast, there has been an increase in local public broadcasters and hyperlocal services. It should be noted, however, that despite a significant decrease in the number of municipalities, there is a stabilisation with an average of 5.9 local media per municipality in 2012, 2015, and 2020⁵.

The number of local media outlets differs per region, and this is not always related to rural or suburban areas. In some suburban areas, such as in the north of Friesland province, each municipality has on average 10 media outlets. These include a regional broadcaster, regional newspapers, local weeklies, local hyperlocal services and local public broadcasters. However, in other regions such as Flevoland province, parts of Zeeland and parts of Limburg the number of outlets is scarce. While there are differences between provinces, studies show that citizens residing in a place with fewer than 50,000 residents are exposed to significantly less local news compared to residents of places with more than 50,000 people. Research of 2019 shows that in large municipalities, there is an average of four times as much local political news compared to small municipalities⁶.

Regional newspapers and broadcasters have difficulties in reaching all the regions. The regional media excel in covering the city in which they have their editorial offices. Due to budget cuts, they sometimes have difficulties dedicating attention to the surrounding areas. In small municipalities, local media would

4 Villamedia, "Kabinet slaat plank mis bij versterking van lokale en regionale journalistiek", 2023, <https://www.villamedia.nl/artikel/kabinet-slaat-plank-mis-bij-versterking-van-regionale-en-lokale-journalistiek>

5 Lectoraat Kwaliteitsjournalistiek in Digitale Transitie, *De opmars van de hyperlocal*, 2021, <https://www.journalismlab.nl/de-opmars-van-de-hyperlocal/>

6 Stimuleringsfonds voor de Journalistiek, "Nieuwsvoorziening in de regio", 2014, <https://www.svdj.nl/onderzoek/nieuwsvoorziening-in-de-regio-2014/>; Stimuleringsfonds voor de Journalistiek, "Pas op! Breekbaar. Een onderzoek naar de lokale nieuwsvoorziening in de G4", SVDJ, Netherlands, 2019, <https://www.svdj.nl/onderzoek/pas-op-breekbaar/>

ideally take over, but they are not always capable of doing so, due to incapacity and insufficient professionals within the organisation.

The local media market is quite turbulent. While hyperlocal services have entered the market in the past ten years, many paper weeklies are closing due to financial problems or are no longer distributed adequately to people's homes. This means that the elderly who prefer news on paper are not always reached by online hyperlocal services. Also, hyperlocal services do not provide sufficient quality journalism: in 2020, the Netherlands counted 593;⁷ they come in diverse models, ranging from fully staffed operations to home-operated websites; editorial and economic foci differ substantially; yet, offering local content is not the biggest problem, many sites underperform in terms of organisation and revenues⁸.

Concluding, local news in the Netherlands is offered by a variety of public and private media outlets. In addition, national newspapers, the national public service broadcaster and the national press agency are increasingly investing in regional topics and allocating regional correspondents in different parts of the country⁹. However, the overall quality of local news and the reach remains challenging.

The map you can find at the [following link](#) refers to the number of local and regional media in the Netherlands in 2020. The original data source for this visualisation is *Lokale journalistiek in Nederland* - Rijk van den Broek en Yael de Haan and you can access it [here](#).

Market and reach – Medium risk (58%)

While the local media landscape in the Netherlands is quite diverse, there are also financial struggles¹⁰. Particularly, the free printed local weeklies are facing severe problems due to decreasing advertising revenues because many local entrepreneurs have their own websites and use their own social media to advertise. Moreover, while municipalities typically advertise in private print media outlets to inform the public of local government issues, nowadays, an increasing number of them have their own websites and professional communication departments to inform the public directly. While these weeklies are struggling, they do still have the largest reach in local journalism¹¹.

There are currently 16 regional newspapers, owned by three publishers (Mediahuis, DPG, and BDU). The latter two own most of the newspapers in the Netherlands.¹² Regional newspapers have been struggling with declining circulation for years. In response, publishers have initiated a process of consolidation and scaling up. In this way, advertisers can potentially reach a larger market.

The local and regional public broadcasters receive yearly funding. Governmental financial support has increased over recent years, accentuating the need for a more vibrant local media landscape, by investing in local investigative journalism and the professionalisation of local public broadcasters. Historically, local public broadcasters have been financially supported through a fixed budget per household (currently 1.53 euro) and additional support by local governments. However, this has proved to be problematic for two reasons.

7 Lectoraat Kwaliteitsjournalistiek in Digitale Transitie, "De opmars van de hyperlocal", *Journalism Lab*, Netherlands, 2021, <https://www.journalismlab.nl/de-opmars-van-de-hyperlocal/>

8 M. Van Kerkhoven and P. Bakker, "The hyperlocal in practice", *Taylor & Francis Online*, 2014, <https://www.tandfonline.com/doi/full/10.1080/1670811.2014.900236>

9 NPO, *Concessiebeleidsplan 2022-2026: Van waarde voor iedereen*, 2022, <https://over.npo.nl/organisatie/openbare-documenten/concessiebeleidsplan>; De Volkskrant, "Colofon," n.d., <https://www.volkskrant.nl/nieuws-achtergrond/het-colofon-van-de-volkskrant-bce3473d/>; Trouw, "Journalisten weten de provinciehuizen nu wel te vinden," 2023, <https://www.trouw.nl/cultuur-media/journalisten-weten-de-provinciehuizen-nu-wel-te-vinden~b2bef2c1/>

10 We could not have access to financial information per news organisation. This is based on interviews of publishers of local print media and documents such as annual reports.

11 Commissariaat van de Media, *De staat van de lokale nieuws- en informatievoorziening: de burgerperspectief*, (2022), <https://www.cvdm.nl/wp-content/uploads/2020/01/Rapport-De-staat-van-de-lokale-informatievoorziening-2022.pdf>

12 Villamedia, "Hoe de Nederlandse media in Belgische handen kwamen: een overzicht", (2022), <https://www.villamedia.nl/artikel/hoe-de-nederlandse-media-in-belgische-handen-kwamen-een-overzicht>

First, areas with a sparse population receive insufficient fixed budgets to run a healthy newsroom. Second, local public broadcasters are dependent on the local government for additional financial support. There will, thus, be a shift in the financial structure from 2025 onwards from local to national government¹³.

Over the past five years, increasing attention has been given to financial support for local journalism. While in 2018 the attention predominantly went to investigative journalism at a local level, it was clear that the basic local journalistic infrastructure was insufficient. Therefore, there is now financial support for the professionalisation of local public service broadcasters. However, studies analysing the level of professionalisation in local print media show there is also a need for financial support in the private local media sector. While local private media can apply for funding for specific programs related to investigative journalism and innovation in journalism from the Dutch Fund for Journalism, there is a need to facilitate the more basic processes of professionalisation and digitalisation of these newsrooms¹⁴. The entire local media sector, including private outlets, received financial support during the Covid-19 pandemic because of decreasing advertising revenues¹⁵.

A recent study shows that Dutch citizens, in general, show interest in local news. 46 percent state that they are extremely or very interested in what is happening in their municipality and local government, while another 43 percent are somewhat interested. Only a very small portion of citizens indicate no interest at all (2 percent) or not much interest (9 percent)¹⁶.

Less engaged or interested citizens prefer news from their immediate surroundings, such as their neighbourhood or district they live in. More interested individuals are also interested in the entire municipality and surrounding municipalities.

The willingness to pay for local news is low. 90 percent of all citizens state that they are not willing to pay for online news about their municipality. Among those who are highly interested, the willingness to pay is slightly higher. However, even in this group, 85 percent have no intention of paying. Citizens who prefer a paid print newspaper as their information medium for local government news are significantly more likely to be willing to pay for information about the municipality compared to those who prefer a free print newspaper¹⁷.

Concluding, while people are very interested in local news, they are unwilling to pay for news. They prefer to look for free outlets, such as regional and public broadcasters, online channels, and not regional and local newspapers they need to pay for.

Safety of local journalists - Medium risk (54%)

The issue of underpayment is a significant problem for local journalists. While regional journalists often receive at least the minimum wage, that cannot be said for their local counterparts. Consequently, local journalism is frequently pursued as a profession only after retirement, when individuals have achieved sufficient financial stability to afford a poorly compensated position at a local news outlet, or by young journalists who want to gain experience. Some local journalists work part-time for media organisations while also holding other positions, which could raise concerns about their independence. As few staff members are employed at local media outlets, local media (both private and public) have difficulties professionalising, let alone adapting to a changing online media landscape. Nevertheless, umbrella organisations such as the Association for Local Public Broadcasting (NLPO) and the association for Local News Media (NNP) facilitate local organisations in their professionalisation strategies and help them to ensure independence.

The Journalist Union has proposed a minimum wage of 30 euros per hour for freelancers starting their careers. However, experienced freelance local journalists often earn significantly less. This situation raises

13 Ministerie OCW, *Visiebrief Lokale Omroepen*, (2023), <https://open.overheid.nl/documenten/ronl-c189161df82bdae4dc36fcaee1feaf6814e427d/pdf>

14 Stimuleringsfonds voor de Journalistiek, "Professionalisering lokale publieke media instellingen," n.d., <https://www.svdj.nl/regeling/lokaleomroepen/>

15 Stimuleringsfonds voor de Journalistiek, "Tijdelijke steunfonds lokale informatievoorziening," n.d., <https://www.svdj.nl/regeling/steunfonds/>

16 Commissariaat van de Media, "De staat van de lokale nieuws- en informatievoorziening: de burgerperspectief", 2022, <https://www.cvdnm.nl/wp-content/uploads/2020/01/Rapport-De-staat-van-de-lokale-informatievoorziening-2022.pdf>

17 *Ibid.*

concerns about their independence, as many freelancers cannot solely rely on their journalistic work to make a living and must take on other professional positions. Freelancers lack social security coverage, leaving them without pay when they fall ill, whether for short or long periods. While freelancers can choose to enrol in disability or unemployment insurance, these options are often expensive, especially considering the already low pay in the profession.

Many (local) journalists are not only dealing with issues of low pay; the number of reported incidents of harassment has increased in recent years. According to the Dutch Foundation for Press Safety in 2021, 272 alerts were documented, compared to 121 in 2020. This upward trend could suggest a rise in physical assaults and harassment incidents targeting journalists. Local journalists face an even greater risk of being targeted with attacks and (online) harassment. Journalists residing in small communities are especially susceptible to being identified¹⁸.

The PersVeilig (press safety) Foundation urges the Dutch authorities to implement a systematic and coordinated mechanism to monitor SLAPPS. Journalists in the Netherlands are becoming more cautious about publishing to avoid the risk of legal action, according to a survey conducted by PersVeilig, which was completed by 858 journalists. A quarter of the respondents stated that they adopt this approach to mitigate risks. Half of all the journalists have experienced at least one instance of legal threats following a publication, and in 20 percent of cases, this escalated to a legal complaint or prosecution. However, specific information about local journalists is lacking¹⁹.

Editorial independence - Low risk (37.5%)

The main aim of the Dutch Media Act 2008 is to provide a varied range of radio and television channels, which everyone can receive. The Act sets requirements for both public and private broadcasters. In the Dutch Media Act there is no explicit article preventing ownership control of commercial or privately owned media, but it does contain some norms and rules concerning the appointment of the board. Private, publicly listed, local media companies must adhere to the Code of Good Governance in which no conflict of interest is required. The ownership structures of relevant commercial publishers in the local sphere, such as Mediahuis, DPG, BDU are not explicitly controlled. Still, there is a low risk detected in this specific sub-domain of private media.

No significant concerns are detected when it comes to the criteria and distribution of state subsidies to local media outlets. The programs are organised by the Dutch Journalism Fund, which receives a yearly budget from the Ministry of Media. All the procedures are open and transparent. While the Dutch Journalism Fund has predominantly channelled funding for public local media outlets, since the Covid pandemic, it has also provided subsidies to help private local media outlets financially. Currently, specific programs to help local print outlets to innovate to the online environment are in place. Not least, the programs for investigative journalism at a local level, which stimulate collaboration between news organisations, both public and private.

State advertising in local media has a long history of local governments publishing in printed local free weeklies about local government information and permit applications that citizens have received. As of 2022, a new law has been installed in which all permit applications need to be also published online. The purpose of this legislative change is to fully inform society digitally about decisions that have an impact on the living environment. Citizens are informed by the government about these decisions so that they can exercise their right to participate in a timely manner.

In terms of protection from commercial and political influences over editorial content, both public and private media are obliged to have an editorial statute guaranteeing editorial independence. However, at a local level, the editorial statute is not required but only encouraged. While local umbrella organisations such as the Local Public Broadcasting Association (NLPO), and local publishers such as NNP, stimulate

18 Free Press Unlimited, "Towards a safer haven: advancing safety of journalists amidst rising threats in the Netherlands", 2022, <https://www.freepressunlimited.org/sites/default/files/documents/MFRR%20Report%20-%20Safety%20of%20journalists%20in%20the%20Netherlands.pdf>

19 NVJ, "198 incidenten gemeld bij PersVeilig in 2022," 2023, <https://www.nvj.nl/nieuws/198-incidenten-gemeld-persveilg-2022>

and facilitate local media to install editorial statutes, in practice, there is great variety among local media organisations.

The Dutch Media Authority, the independent regulator for audiovisual media, is responsible for conducting research on the diversity and independence of information provision in the Netherlands and advises the Minister of Primary and Secondary Education and Media. It has a remit over local public media²⁰. The process to apply for a local public broadcasting licence is written in the Media Act and conducted by the Media Authority. This is done accordingly in a fair and transparent way.

In terms of independence of national and regional public broadcasters, the Media Act explicitly specifies incompatible functions concerning membership of the supervisory board and the board of directors²¹. This is not the case for local public broadcasters. However, as of 1 July 2021, the Law on Governance and Oversight of Legal Entities (WBTR in Dutch)²² is in effect in the context of good governance.²³ Local public broadcasters must adhere to this. The Dutch Media Act also ensures independent journalism by stipulating that public media services must provide media content that is independent of commercial influences and free from government influences. In this specific subdomain, a medium risk is observed mostly because local PSB are still dependent on municipality funds. However, in the coming years, funding for local PSB will shift from local to national government.

Some concerns are detected concerning editorial independence of local media. First, due to financial pressures, many local media are dealing with budget cuts, and have difficulties in providing only independent journalism. Second, political influence over local editorials can happen indirectly, since local governments have control over the budget of local PSB, and the fact that local media in general are not bound by editorial statutes. Moreover, the increasing influence of communication departments at local governments, which often use journalistic newsroom conventions, makes the distinction between journalism and communication unclear. This is a great concern among journalists. Third, the fees for local journalists are not sufficient, meaning (freelance) local journalists are obliged to take on commercial jobs or tasks, possibly interfering with their independent role.

Overall, the editorial independence of local media does not show high risks, while there are some concerns to take into account.

Social inclusiveness - Medium Risk (57%)

News in the Netherlands is traditionally not aimed at reaching minorities and most news organisations do not provide news in different languages. However, with the increasing number of immigrants in the Netherlands, in 2015 the Dutch Public Broadcaster NPO created the platform *Net in Nederland* (New to the Netherlands)²⁴. The platform provides information in Dutch and Arabic about Dutch history, culture and language and is specially made for and by immigrants. However, this does not resolve the language gap, an issue that became quite prominent during the Covid pandemic, when many minorities were unable to read crucial news on policy measures. This also became clear during the earthquakes in Turkey and Syria in 2023. Acknowledging the issue of the language gap, in 2022, the Dutch Public Broadcaster started to experiment with the automatic translation of news articles by means of artificial intelligence. News articles can be translated into English, Turkish, Polish, Arabic and Chinese²⁵. Regional broadcasters are also experimenting with artificial intelligence to translate news into different languages.

Nevertheless, outlets in different languages do not solve the issue of the representation of minorities in the news. Many studies show that minorities are negatively represented or under-represented in news

20 Commissariaat van de Media, n.d., <https://www.cvdm.nl/>

21 Mediawet 2008, <https://wetten.overheid.nl/BWBR0025028/2023-01-01>

22 Wet Bestuur en Toezichtspersoon, 2021, <https://wbtr.nl/de-wet/>

23 This amendment to the Civil Code aims to enhance the governance of foundations (and associations), incorporating rules on tasks, powers, obligations, and liability.

24 NPO, "Net in Nederland," n.d., <https://npokennis.nl/program/13/net-in-nederland>,

25 NOS, "About NOS Lab," n.d., <https://translations.lab.nos.nl/about>

reporting and television programs of the Dutch public service media²⁶. In studies conducted with the immigrant audience, many participants also perceive Dutch media reporting as judgmental and portraying a negative image of immigrants²⁷. They do not recognize themselves in Dutch public media reporting.

There are private news outlets that distribute news services in minority languages. Due to the emergence of the Internet and social media, there are several private (online) outlets that aim to reach non-Dutch immigrants and provide news in the English language. Increasingly, specific groups are starting their own online communities to share news on what is going on in the Netherlands, translating news into specific languages tailored to a specific group, such as the Brazilian or Polish community. These are online communities that start from the community itself and are often not journalistic platforms. However, no systematic research has been conducted on these platforms.

Best practices and open public sphere

The Dutch Fund for Journalism²⁸ encourages and facilitates funding for innovative projects in local journalism. The initiatives are diverse and range from stimulating interaction between local media and the public, to working on collaboration between investigative journalists' collectives, local media and citizens and to creating more community journalism at neighbourhood level in large cities. In coming years, the Fund will not only facilitate financially but also help local news organisations through coaching and courses.

Stimulated by national media policy, in 2021, a project was launched to enhance the collaboration between public broadcasters at the national, regional and local level. The objective is twofold: to facilitate professionalisation and to create more synergy between local and national news. While this specific project ended in 2023, collaboration at three levels has been stimulated and is still one of the focus points in media policy²⁹.

Public broadcasters are increasingly seeing the added value of collaboration, not only for specific media coverage, but also for facilitating community building in a specific region. For example, in December 2023, the regional broadcaster Omroep West³⁰ collaborated with ten local public service broadcasters in the same region to start a fundraising campaign during the holidays for families with limited financial means. Similarly, the regional public service broadcaster NH Nieuws³¹ started an initiative to connect people seeking assistance with those willing to offer help. These projects show that journalists do not only take on the role of informer but also of facilitator in connecting people with each other.

26 Kartosen-Wong, "Diversiteit is bij de NPO eerder wensdenken en pr-praat dan werkelijkheid," 2020, <https://www.parool.nl/columns-opinie/diversiteit-is-bij-de-npo-eerder-wensdenken-en-pr-praat-dan-werkelijkheid~b8aadb45/?referrer=https://www.google.com/>, ; J. Engelbert and I. Awad, "Securitizing cultural diversity: Dutch public broadcasting in post-multicultural and de-pillarized times," 2014, <https://journals.sagepub.com/doi/abs/10.1177/1742766514552352>

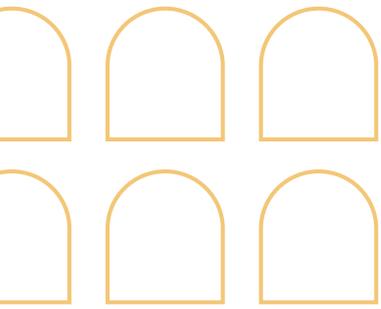
27 A. Alancar and M. Deuze, "News for assimilation or integration? Examining the functions of news in shaping acculturation experiences of immigrants in the Netherlands and Spain," 2017, <https://journals.sagepub.com/doi/pdf/10.1177/0267323117689993>

28 The Dutch Fund for Journalism, "Supported projects," 2023, <https://www.svdj.nl/projecten/>, .

29 Ministerie OCW, "Visiebrief lokale omroepen," 2023, <https://open.overheid.nl/documenten/ronl-c189161df82bdae4dc36fcaae1feaf6814e427d/pdf>

30 Omroep West, "Van de Hoofdredactie: hoe Sinterklaas drillboor doet zwijgen," 2023, <https://www.omroepwest.nl/nieuws/4777898/van-de-hoofdredactie-hoe-sinterklaas-drilboor-doet-zwijgen>

31 NH Helpt, NH Nieuws, 2023, <https://jouw.nhnieuws.nl/>



Comparative analysis, conclusions and recommendations

The following paragraphs are summarising the main findings of the Local Media for Democracy research, with a comparative perspective, across the EU. These conclusions touch upon each of the indicators employed in the LM4D investigation, and add recommendations addressing public institutions, civil society, local newsrooms and journalists, journalistic organisations, academia as well as other stakeholders.

Contextual variables

The first 12 questions of the questionnaire are “contextual variables” which collect aggregate data and general information on the EU countries without carrying out any risk assessment. The information requested is manifold and intends to provide a contextual overview of a specific country to support the analysis of other variables. Indeed, these variables offer valuable insights into land area and population density, geographic areas and wealth distribution, media governance structures and legislative competences, cultural minorities and internet penetration. In each of the country chapters of this report, these have been summarised under the section “context.” In the following chapter, we summarize the main results.

In general, this part of the research outlines the rich diversity and heterogeneity of European countries in terms of geography, history, economy and governance structures. This is particularly evident for land area and population that range from vast countries like France and Spain - where there are extended areas with lower population density that are naturally vulnerable to news desertification - to small countries such as Malta, Luxembourg and Cyprus, where the concept of local news largely overlaps with national news. There are emerging geographical and cultural differences too. These can be observed especially along the north-south and east-west axis. Generally speaking, Northern and Western European countries tend to have stronger Public Service Media and more public debate on local media issues which might mitigate the risks of news desertification, whereas Eastern European countries tend to have weaker and more concentrated media markets due to the transition from a Communist media system, and this might contribute to news desertification. Of course, such generalisations are merely indicative. It is also important to note that not only does each country have its own unique specificities, but there are also variations in local media contexts and offerings within countries.

Across Europe, a common characteristic is that the debate on “news deserts” is not really widespread. In most cases, the debate tends to be non-existent (e.g., Bulgaria) or occasionally limited to policymakers, journalists, NGOs, and/or researchers (e.g., Portugal, Spain, Austria, Denmark). In

many cases, there are ongoing somewhat similar or overlapping debates such as local news decline (e.g., Czechia), the risk of job losses (e.g., Finland), media concentration (e.g., France), community media recognition (e.g., Cyprus), or the broader viability of local media (e.g., Greece, Belgium, Italy). Only in a few cases, it is claimed that there is a specific debate on news deserts (e.g., The Netherlands, Ireland, Sweden). All in all, the phenomenon of “news deserts” appears relatively novel and still emergent in the public discourse. In particular, it is the term “news deserts” that is not employed, whereas similar or related issues on local media are actually debated in many, if not, most countries. And yet, even if there is no regular debate, many LM4D country teams have recognised that there should be one, and concerns about the emergence of this phenomenon in general seem to be growing, especially because the crisis of local media is deteriorating. Interestingly, it could be further explored the relationship between a low degree of debate on news deserts and the very same phenomenon. As a matter of fact, the countries where a debate is better developed seem to be those who have ultimately scored better in our risk assessment exercise (e.g., Sweden). Similarly, in countries with already weak local media landscapes, research and debate on the phenomenon are less developed.

For the sake of this research, broad definitions of community¹ and local media² were elaborated. However, when asked to report the definitions used in their country as emerging from legal acts, research or policy papers (variable 7), the answers of local researchers varied considerably in practice. It emerges that the notion of community media is most often not explicitly defined in legislative frameworks. Community media is sometimes treated synonymously with “non-profit media”, “hyper-local media”, “independent media”, or “media associations”. Even in the rare cases where a specific definition exists, it may be defined in specific settings and only for specific media sectors. This holds true for local media too. More broadly, the lack of clear and common meanings shows the need for the potential development at the European level for shared legal definitions, potentially with nuanced definitions for each medium. The legal recognition of these notions would be the first step for a healthy community media ecosystem as these can contribute to give access to adequate funding by national authorities³.

Unsurprisingly, the state and development of local and community media differs substantially across Europe. For example, while some countries show thriving hyper-local community media (e.g., Sweden), others have no community media at all (e.g., the Czech Republic). Nonetheless, some form of local media exists in all EU states and the whole sector has gone through a painful transformation in the last two decades, with most places reporting a decline. Common issues include not only the open challenges and opportunities emerging from the digital transition but also the significant role of the COVID pandemic in worsening the crisis of media.

Finally, the variable aimed at exploring the relationship between economically deprived areas and news deserts has had mixed results (variable 11); in some cases, correlations were detected (e.g., Spain, Germany, France), in others no correlation was found at all (e.g., Portugal, Denmark, Bulgaria, or even the city of Riga in Latvia). In addition, to claim the existence of a causal relationship would require further research. This is even clearer in the case of the relationship between low internet penetration and news deserts

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- 1 From the LM4D research ‘Glossary’: “Local media cover different types of media, including print, audiovisual and digital, that operate at different sub-national levels, and “cover events that fall within a local context, are relevant to a small, locally defined and constrained audience and are determined by specific localities and geographical boundaries” (D. Dimitrakopoulou, 2015). It is also important to underline the “cohesive” aspect of local media, as local media offer opportunities of discussion to local residents, or members of a community, among which interpersonal communications are supposedly more common. However, this definition is only used as a guide. Due to the specificities of local media in the 27 EU member states, we encourage the local researchers to provide their own definition of local media and to fill in the questionnaire accordingly”. Glossary: <https://cmpf.eui.eu/local-media-for-democracy-project/local-media-for-democracy-methodology/>
 - 2 From the LM4D ‘Glossary’: “According to the Council of Europe standards, community media take the form of broadcasting and/or multimedia projects and share some of the following characteristics: independence from governments, business companies, religious institutions and political parties; not-for-profit orientation; ownership by and accountability to local communities and/or communities of interest which they serve; voluntary participation of civil society members in the devising and management of programs; activities aiming at social gain and community benefit; commitment to inclusive and intercultural practices. Community media offer and encourage community participation at different levels of their structures. Community media have a clearly distinct identity alongside national public service media and private commercial media”. Glossary: <https://cmpf.eui.eu/local-media-for-democracy-project/local-media-for-democracy-methodology/>
 - 3 A. Gulyas, ‘Local and community media in Europe. A comparative analysis of the Media Pluralism Monitor data between 2020 and 2023’, Centre for Media Pluralism and Media Freedom, European University Institute, Research Project Report, 2023. <https://cadmus.eui.eu/bitstream/handle/1814/75950/QM-07-23-384-EN-N%5b84%5d.pdf?sequence=1&isAllowed=y>; M. Palmer and J. Seethaler, ‘Evolution of space and geography in media pluralism: A typology of community media in the European Union’, in E. Brogi, I. Nenadić and P. L. Parcu (Eds.) ‘Media Pluralism in the Digital Era: Legal, Economic, Social, and Political Lessons Learnt from Europe’, 2024, Routledge.

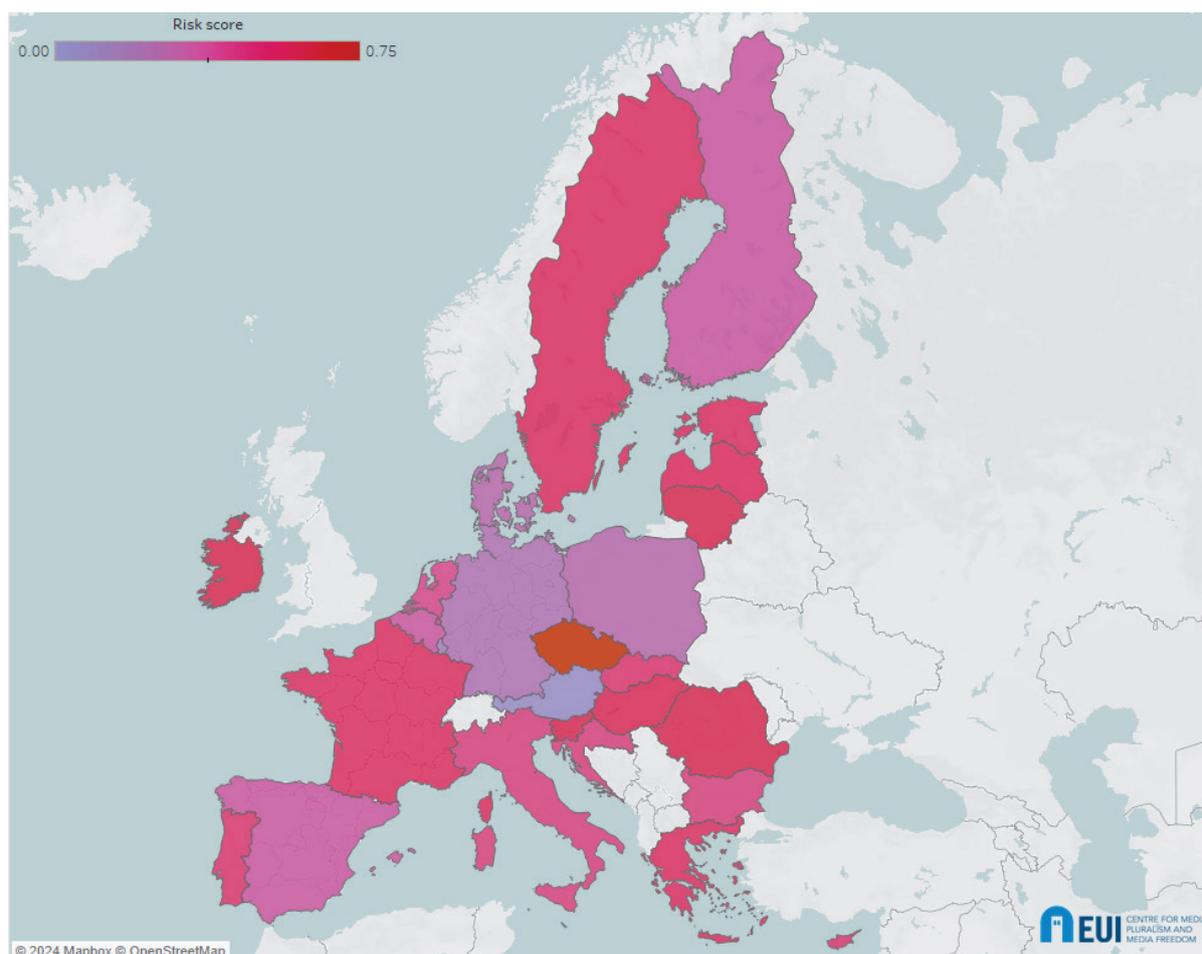
(variable 12), where a loose correlation was found at most. Ultimately, even richer areas with high internet penetration may be considered, or risk becoming, news deserts. These variables corroborate the fact that the phenomenon of news deserts is a multidimensional phenomenon with multiple and more nuanced causes. On the one hand, regional wealthiness may not be decisive as much as the economic growth and investment trends, especially in the media market. On the other hand, internet penetration may result in more internet usage. However, online news consumption and social media represent a double-edged sword insofar as they may mitigate but also contribute to news desertification.⁴

Granularity of infrastructure of local media

This indicator investigates the presence and offer of local and community media services in the rural, suburban and urban areas of a country, as well as the physical presence of local journalists in the field or in their communities. Additionally, it investigates the presence of local branches and correspondents of the PSM and of the main national news agency.

As shown by Figure 1, on average, a medium-to-high risk can be detected in most of the countries under study. Austria and Denmark stand out as noteworthy cases insofar as the country researchers did not report any news deserts, however, they are expected to emerge unless the challenges for local and community media are addressed in the near future. Finally, the cases of Malta, Cyprus and Luxembourg show that deciphering local from national media is very difficult, if not impossible, in such small countries, and the problems highlighted there extend to the entire media sector.

Figure 1: Risk for the indicator “Granularity of infrastructure of local media” in the 27 EU Member States



4 U. Reviglio, 'The ambivalent and ambiguous role of social media in news desertification', 1 September 2023, posted on: <https://cmpf.eui.eu/the-ambivalent-and-ambiguous-role-of-social-media-in-news-desertification/>

Looking at the **existence of local media and local journalists on the ground**, it should be noted that **the situation for news services in rural areas⁵ is increasingly problematic** (medium risk, variable 13), due to both issues related to press distribution and a diminishing number of points of sale, as well as to the digital transition coupled with an ageing rural population. In fact, the digital literacy of elderly people is not always sufficient to guarantee their access to trustworthy information in a context where the availability of local press is declining. In some countries, a significant portion of the population lives in rural areas (e.g. more than 40% in Croatia, Slovakia and Poland, more than 30% in France). Considering the EU as a whole, rural areas accounted for 83% of the total EU area in 2018⁶.

One country, Romania, considers the situation as posing a very high risk in rural areas, meaning that there are almost no local media outlets in rural areas in the country. Five countries (Bulgaria, Cyprus, Czech Republic, Slovakia, Slovenia) evaluate the offer in rural areas as a high risk, meaning that there are some local media outlets in rural areas, but they do not reach the population living in the most remote areas of the country. 7 countries scored low risk (Belgium, Denmark, Finland, Hungary, Luxembourg, the Netherlands, Poland) and 2, very low risk (Austria and Malta). In this regard, two different sets of considerations should be done: one related to the small size of certain countries (e.g., Malta, Luxembourg) where few media outlets are dedicated to rural areas only. On the other side, with regard to larger countries like Poland and Hungary, it should be noted that the media on the ground actually exist, even reaching the most remote areas of the country. However, the latter are often owned by municipalities or concentrated and captured media conglomerates, so in practice, there is a lack of offering adequate plurality of contents and viewpoints. Other local researchers (e.g. in Croatia, Czech Republic, Slovenia, Slovakia) confirmed that most, if not all, outlets in these areas are controlled by the government, or take the form of mere bulletins, as it will be better outlined in the conclusions related to the “Editorial Independence” indicator. This consideration confirms the validity of the methodology undertaken for the LM4D study, which avoids merely considering a news desert as an area where no or few media outlets exist but balances this criterion with other elements that impact on the quality of the local news coverage. The remaining countries (most of the EU countries) scored a medium risk, meaning that there are local media outlets in rural areas, but their distribution is problematic (e.g., decreasing number of selling points, low Internet penetration).

Rural areas suffer also because of **distribution-related issues** (e.g. Bulgaria, Czechia, Estonia, Hungary, Italy, Spain, Sweden) and the number of subscriptions and home delivery in these areas is declining, as is explained in the conclusions for the “Market and reach” indicator of this report. Moreover, regarding the local press, the digital transition had a varied impact affecting different areas and sectors differently. In some cases, the issue is more pronounced in some areas rather than others (e.g. particularly in Germany, in the North and East part of the country) or for some media formats especially (e.g., radio is typically more effective at reaching rural areas; the same is true for radio and online in suburban areas). Moreover, the substitution of consumption of legacy media with online hyperlocals does not appear to address the problem of access to local news for the elderly. However, in some contexts (e.g. in Spain, Sweden), digital hyperlocals play a key role in contributing to the information environment in rural areas. The main problem for these outlets is instead that of economic sustainability.

With regard to **suburban areas⁷**, it is worth noting that Europe is not characterised by the presence of many metropolises, while most of the cities are relatively small in terms of population and size, especially in smaller countries. Thus, the category of suburban areas is not always relevant in all contexts. Where suburban areas exist, the offer of information has proven to be rather problematic (medium risk, variable 14). The very high risk for the news offer in suburban areas was scored by Bulgaria and France. A high risk was scored by 7 countries, namely Croatia, Cyprus, Czech Republic, Hungary, Ireland, Slovakia and Slovenia. A low and very low risk - meaning that local media in suburban areas reach the population successfully - was found in Greece and Poland (low) and in Austria, Denmark, Germany, Luxembourg, Malta

5 Rural areas are understood as a geographic area that is located outside towns and cities. Typical rural areas have a low population density and small settlements. Agricultural areas and areas with forestry are typically described as rural.

6 EU rural areas in numbers, https://rural-vision.europa.eu/maps-data/rural-areas-numbers_en?prefLang=it

7 For the sake of this study, suburban areas are intended as the periphery of towns and cities, belonging to the same administrative jurisdiction. In some metropolitan areas, suburbs exist as separate residential communities within commuting distance of a city.

(very low). The remaining countries scored medium risk - meaning that there are local outlets in suburban areas albeit their diversity is limited - was scored in 8 countries (Belgium, Estonia, Italy, Lithuania, Netherlands, Spain, Sweden, Portugal).

The research outlines that suburban areas are reached both by regional and city media, but the local media are rarely based in the outskirts (e.g. in Belgium, Cyprus, Estonia). Furthermore, these media do not usually cover the events taking place specific to these areas or its representatives (e.g. in Portugal), or - in the case of socio-economically disadvantaged suburban areas- they do so, but in a caricatural manner, dramatising crime news (e.g., in France and Ireland, namely countries with bigger and more diverse suburban areas). Some researchers, for example, Eileen Cullotty for Ireland, noted that this lack of services based and dedicated to suburban areas is particularly worrying when considering that suburbs - especially around Dublin - are growing considerably⁸.

Generally speaking, **urban areas** instead scored the lowest EU aggregate risk evaluation in terms of the geographical offer of local media (variable 15, investigating the presence and offer of local media in the main cities, scores a low risk, on average. In fact, urban areas receive coverage from all media formats, including online - considering the higher internet penetration there - not only by local city media but also national media covering city-related issues. For example, it is worth quoting Franck Bousquet, who defines the national press in France as the “Parisian press”: similarly, he explains that “the French news network is highly centralised in urban areas. It is organised in a “hub-and-spoke” pattern from the centre of Paris, with a similar structure in the main cities”⁹.

Moreover, a common trend throughout Europe is related to the centralisation of newsrooms in the main cities, with journalists reaching the most remote areas of the country only occasionally or conducting desk journalism. However, in some cases, the researchers reported that local media are absent in the main cities (because this job is left to national media) such as in the case of Riga¹⁰; moreover, some striking differences from city to city were reported (e.g. between Athens and Thessaloniki in Greece¹¹). Last but not least, as explained a few lines above, the poorer neighbourhoods of the main cities are reported to be under covered by the local news or portrayed in a negative perspective (e.g. focusing on criminality rather than performing a service role for the community living there).

The highest aggregate EU risk score for the indicator “Granularity of infrastructure of local media” has been recorded for variable 16 (medium risk), which asks whether there has been an **increase or decrease of local journalists in the last five years, as well as the location where they are typically based**. As previously mentioned, due to the centralisation of newsrooms in the main cities, they are increasingly located in the main regional towns and only extend reach to the most remote areas during special events, thus not guaranteeing a continuous overview of certain local situations. Moreover, the lack of data in public registries about professional local journalists and their locations, and the scattered information retrieved by journalistic associations, made it difficult for researchers to assess this question. The lack of data, in itself, constitutes a risk. However, some significant general trends could be highlighted, detected through existing reports and conducting interviews.

Some countries that scored low risk regarding the news offer in rural, suburban and urban areas, have instead reported a risk related to the local journalists’ number and location, for example, in Denmark and Germany. Czech Republic scored a very high risk in this regard, while 3 countries (Greece, Hungary, Sweden) scored a high risk, meaning that most of the journalists are based in centralised offices and are assigned by newsrooms to report from local areas, only occasionally, or some journalists are based in rural or small urban areas, but work for national news outlets (e.g., because living costs are lower outside the main cities), and report about local communities and events, only occasionally. In Sweden, for example, Stur

8 E. Cullotty, “Ireland” chapter in this report.

9 F. Bousquet, “France” chapter in this report.

10 A. Rožukalne and J. Juzefovičs, “Latvia” chapter in this report.

11 L. Papadopoulou and I. Angelou, “Greece” chapter in this report.

and Cepaite Nilsson¹² reported that “more than half of all local newsrooms closed down, about 35-40% of local reporters have disappeared from the local media market and most local reporters are nowadays based in centralised newsrooms in the capital or larger regional cities”.

The decrease in the number of local journalists goes in parallel with the trend of the closure of local newsrooms and deteriorating wages for local journalists. The situation was additionally exacerbated by the COVID-19 pandemic. As explained by Rožukalne and Juzefovičs, referring to the Latvian context, this leads to “ageing newsrooms” and burnouts, in situations where local journalists are required to cover too many roles and tasks.¹³ Moreover, as outlined for example by Kalbhenn concerning the German case, the situation appears to be more at risk for local journalists working in the local press than for workers in the broadcasting sector (tv and radio)¹⁴. Historically (and nowadays) local press/text based journalism is the most significant sector in terms of the number of local journalists employed. In addition, the issue is difficult to monitor as the number of journalists working in new forms or online or community media are not recorded, so we do not know the trends in those cases.

On a positive note, PSMs are often entrusted with a specific remit of covering the national territory exhaustively, which is crucial all over Europe in guaranteeing an adequate coverage of regional and local areas both geographically and offering services in minority languages. As a matter of fact, variable 17, which asks about **PSMs regional and local coverage and the number of PSM correspondents on the ground**, was the second lowest in aggregate risk throughout Europe (low risk). In some countries, as reported by Beaufort and Schulz-Tomancok for Austria, the PSM stations and their correspondents are located in the capitals of all the provinces, recording top ratings in terms of reach and market share.¹⁵ However, decreasing resources for these public media actors might put at risk their role for local communities. Among the 5 countries that scored a high risk in this regard (Czech Republic, Greece, Hungary, Ireland and Latvia), the Hungarian situation is particularly worth mentioning. In 2011, the PSM—now the *Duna* Media Service Provider Company providing television, radio, and online services, as well as running the only Hungarian news agency—restructured by the Fidesz government, unexpectedly closed its regional studios, which were completely dismantled.¹⁶

Finally, variable 18 assesses **if the main news agency is keeping local/regional correspondents or branches on the ground**. In this case, the overall level of risk increases compared to the availability of PSM offices and correspondents (medium risk). Moreover, the LM4D research identified a lower transparency from some of these national agencies in disclosing in their websites where correspondents are based, as well as being less responsive to researchers in their related inquiries.

Generally speaking, currently, there are very few mappings of local news outlets across the EU, both from an editorial and economic perspective. The local media sector is very difficult to map, due to lack of comprehensive data and comparative research. A better monitoring of the diversity of the local news media market would make it possible to fine-tune support policies and infrastructure requirements, and raise their visibility within the public sphere.

Recommendations

To the EU, Member States and local public authorities:

- Elaborate legal definitions of local and community media covering all media formats (press, tv, radio, online- including digital start-ups);
- Public registries of local media should be in place. National and regional/local media authorities and other national and regional/local public agencies should disclose the data necessary to evaluate the location, ownership and revenue data of local and community media as well as data on broader

12 E. Stur and A. Cepaite Nilsson, “Sweden” chapter in this report.

13 Rožukalne and J. Juzefovičs, “Latvia” chapter in this report.

14 J. C. Kalbhenn, “Germany” chapter in this report.

15 ORF radio stations account for three in four of the radio minutes listened to in the country. M. Beaufort and A. Schulz-Tomancok, “Austria” chapter in this report.

16 G. Polyák and A. Urbán, “Hungary” chapter in this report.

indicators of the health or performance of local and community media. Registries should provide homogeneous data across regions and be machine-readable. When not public, disclosure should be guaranteed free of charge and within reasonable timeframes;

- Enact regulations aimed at guaranteeing a decent minimum salary and social security schemes for local journalists in order to counter the declining number of local journalists;
- Introducing initiatives that support local and community media for communities who are under-served, located in existing or emerging news deserts;
- Guarantee adequate financial support to public service media for them to maintain/establish local branches as well as keeping/hiring local correspondents on the ground;
- Finance long-term research projects aimed at mapping local and community media on the ground.

To journalistic organisations:

- Engage in projects and research aimed at investigating local media on the ground, and to act as intermediation actors between researchers and media companies, media authorities and other institutions.

To journalists and newsrooms:

- To be transparent disclosing in a clear and machine-readable format relevant data facilitating the analysis of the state of local media companies;
- To public service media and news agencies: maintain local branches and correspondents, strengthening their involvement in local and regional reporting.

To representatives of academia:

- To consider local media as a key focus for media studies, thus raising awareness within the academic community on the need for related investigations;
- To strengthen the cooperation between universities and local media outlets.

To different stakeholders:

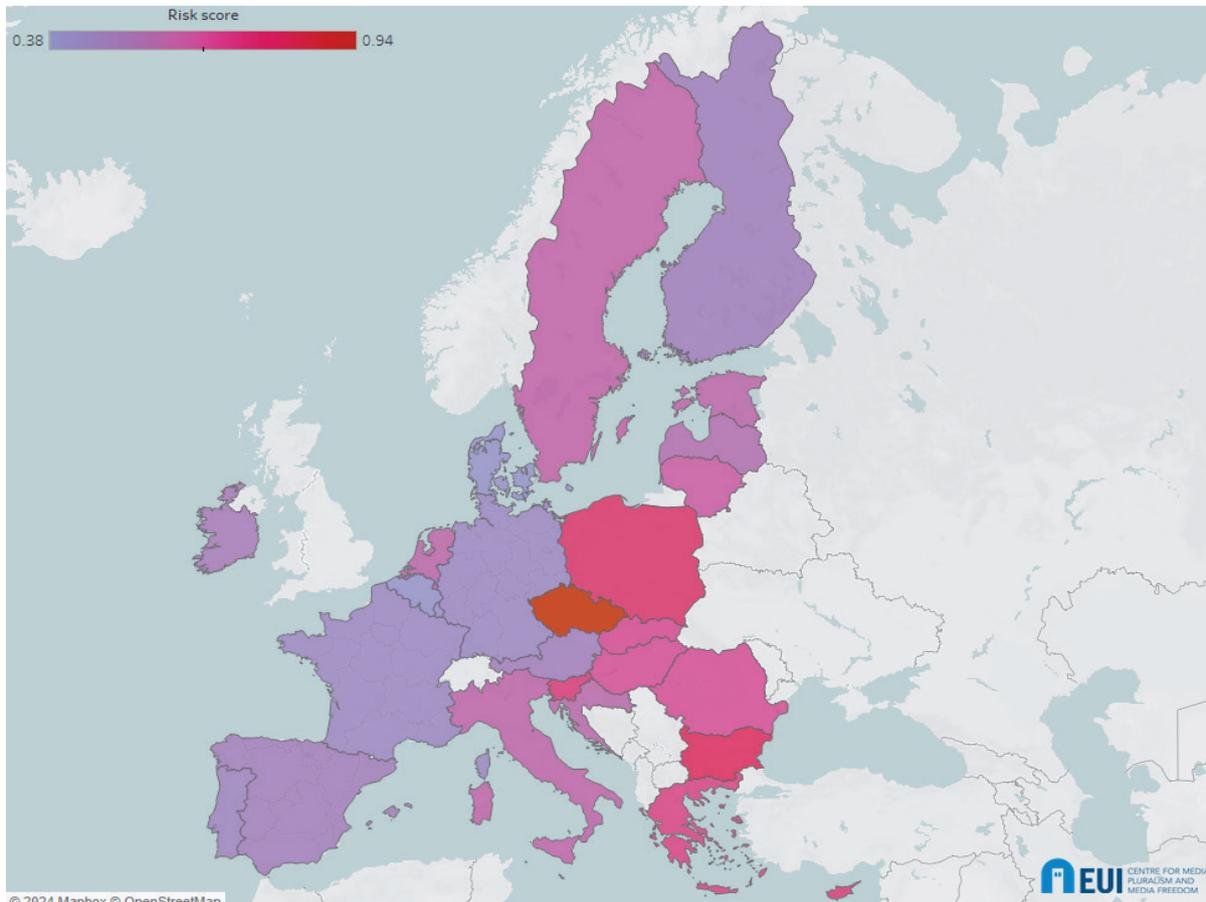
- The media authority, chambers of commerce and other public agencies holding relevant public data on local and community media should provide them up-to-date, machine readable and comparable across the different institutions within the country;
- Openly discuss and legislatively address the existence of municipal media and their status within the media landscape: in a mapping of local media on the ground, they should be clearly distinguished from independent media;
- Civil society organisations working on media freedom and plurality should actively engage in projects related to mapping and sustaining local and community media initiatives.

Market and reach

This indicator assesses the economic conditions, the viability and sustainability for local and community media in the country. It investigates revenues, supply distribution levels, subsidies, state advertising and market shares.

As Figure 2 shows, the **highest level of risk in Bulgaria, Cyprus, Czech Republic, Poland and Slovenia, and lowest in Austria, Belgium, Denmark, Finland, Germany Luxembourg and Portugal.**

Figure 2: Risk for the indicator “Market and reach” in the 27 EU Member States



The crisis related to the digital transformation of news media has disrupted the media ecosystem, particularly at the local level, considering its inferior market size, limited audience reach, weaker bargaining power, and limited resources to adapt to digitalisation compared to nationwide counterparts. Local media revenues have declined in several countries according to data from the Media Pluralism Monitor,¹⁷ and these findings are corroborated by the LM4D Research. It is leading to a situation where local and community media are becoming more dependent on state intervention to survive¹⁸. With this in mind, the market situation is important to analyse to gauge the economic viability and sustainability of local and community media. This study has investigated many aspects such as revenues, state subsidies, advertising, supply distribution, ownership concentration, audience reach and the willingness of audiences to pay for local news. The most telling finding from this research is the lack of data in several countries, particularly concerning local and community media revenues and the lack of audience reach data. As such, the country experts assessed the situation, relying on other sources such as interviews with experts and relevant stakeholders, as well as reports from various NGOs and research organisations.

The Market and Reach indicator has a medium aggregate score for all EU countries of 58% and it is

17 A. Gulyas. Local and community media in Europe. A comparative analysis of the Media Pluralism Monitor data between 2020 and 2023, Florence: CMPF, 2023, p. 10.

18 T. Blagojev, D. Borges, E. Brogi, J. E. Kermer, M. Trevisan, and S. Verza. News deserts in Europe: Assessing risks for local and community media in the 27 EU member states (technical report). Florence: CMPF, 2023, p. 11.

the highest risk score in comparison to other indicators. These findings indicate that local and community media operate in very adverse market conditions and are confronted with many challenges related to their economic sustainability. The most problematic situation is decreasing revenue (including advertising revenue) for local media as well as lack of willingness for audiences to pay for news (variables 19, 24 and 29 respectively), which all scored a high risk. The situation concerning the concentration of ownership, the lack of funding to promote innovation, and lack of sufficient financial support for community media (variables 28, 30 and 26 respectively) also poses a high risk, albeit to a lesser extent.

In Bulgaria, Czech Republic, Germany, Latvia, Poland, and Slovakia, researchers report a very high risk when it comes to **decreasing revenues for local media outlets** (variable 19), with the local press purported to be the most adversely affected media sector. The only country scoring low risk is Spain, particularly in the television broadcasting and radio sector. According to the research teams from Poland and Cyprus, the government does not provide **subsidies to local media outlets** (variable 23) and they assess this as a very high risk. Similarly, in Bulgaria, Czech Republic, Germany, and Romania state subsidies are not provided to local media.¹⁹ In Slovakia too, there is no financial support except for ‘national minority’ media outlets. Overall, the researchers for Croatia, Dina Vozab and Antonia Čuvalo, report decreasing financial support – which is susceptible to media capture – an issue which is compounded by the purported lack of transparency in the allocation of funds. When asked to assess **whether direct or indirect government support to local media is sufficient** (variable 22), five research teams (Belgium, Denmark, France, Latvia and Luxembourg) deemed it as such. However, in France, the biggest beneficiaries of financial support are predominantly large media groups. The insufficiency of financial support was detected in Bulgaria, Czech Republic, Cyprus, Malta, and Slovakia (all scoring very high risk). Decreasing **commercial advertising revenue** (variable 24) were reported in Greece in all media sectors, with local newspapers and radio stations struggling, in particular, as most advertisers opt to place their advertisements on national platforms. Decreases were also reported in the Czech Republic (for the print and TV sector, particularly after the COVID-19 pandemic), Poland (radio and print), and Latvia in the print sector, although modest increases were reported in the audiovisual and online media sector. In all these countries, researchers scored this variable as a very high risk. Only Spain reported a trend of increasing advertising revenue, with the digital sector excelling, in particular.

The key issues for **community media** are the lack of legal definitions, the dependence on state subsidies, and issues in finding sustainable business models. Thus, not surprisingly, when asked about increasing or decreasing revenues for these media outlets (variable 25), over half of EU member states (52%) answered that it is not applicable, or that data are not available.²⁰ Only four countries reported decreasing revenues for community media (Hungary, Poland, Spain, and Sweden), while six reported that revenues are stable (Belgium, Croatia, Denmark, France, Greece, and Portugal) and three reported that revenues increased (Austria, Germany, Luxembourg). In Germany, while specific data on revenue trends is unavailable, the issue is not deemed to be problematic as community media reportedly receive pro rata subsidies and donations on a periodic basis. In only thirteen countries, some financial support for community media was reported by their respective country teams (variable 27), with the remaining countries reporting no data/not applicable issues. Hungary reports the highest risk score and three countries (Croatia, Poland, Sweden) report medium risk with the latter reporting fluctuating levels of support. Nine countries were classified as very low risk and low risk, with Germany, Austria, Denmark, Italy, Luxembourg, and Slovakia reporting an increase in financial support.²¹ Belgium reported stable levels of support, while Ireland and France reported that some form of financial support was available²².

Concerning the **sufficiency of financial support by the government to community media** (variable 26), Cyprus, Greece, Malta, Slovakia, and Spain scored this variable as a very high risk, meaning that support was deemed as insufficient or even non-existent. In the cases of Hungary, Italy, Poland and Slovenia,

19 That said, in Poland, state subsidies are provided to the local government press and some ad-hoc funding was provided during the COVID-19 pandemic in both Poland and Germany.

20 Please refer to the ‘Local Media for Democracy’ methodology, particularly, pages 4-5, for an explanation on how NA and no data questions are dealt with. Methodology available at: https://cmpf.eui.eu/wp-content/uploads/2023/07/Methodology-LM4D_update.pdf

21 In Germany, financial support for community media is only available in the state of Berlin-Brandenburg.

22 In Ireland, financial support for community media was recently established via the recently introduced Community Media Grant Scheme.

financial support was also regarded as inadequate (high risk). In Malta, community media operate through volunteers and have extremely limited reach, while in Spain, community media still function without a licence due to the absence of necessary regulation. In both Cyprus and Slovakia, the negligible financial support available is only allocated to national media outlets, with no such support available for local equivalents, whilst in Greece, community media receive no support whatsoever. On the other hand, in Denmark, Estonia, Germany and Luxembourg, the support was assessed as sufficient (low risk).

The crisis brought about by technological developments has led to **local media outlets closing down**.²³ A significant number of closures was reported in three countries and scored very high risk (variable 20), specifically: Czech Republic (print), Bulgaria (regional newspapers, local TVs, but also the *MSAT Varna* news agency has closed down) and Greece (radio, TV and newspapers). On the other hand, seven countries report a stable local media market or very few closures (Austria, Belgium, Cyprus, France, Germany, Luxembourg, and Malta). However, even in a context where no immediate issue of this nature is identified, as is the case in Austria, the current situation in the local media market may lead to the creation of news desert areas in certain parts of the country if nothing is done to face the issue.²⁴

While the acquisition of smaller outlets by bigger groups may support their economic viability, this may enable monopolistic structures.²⁵ Several notable examples of very high risk **ownership concentration** (variable 28) were reported in Sweden (with *Bonniers News*, *Norrköpings Tidningar*, *Bonniers News Local*, *Gota Media* and *Stampen Lokala medier* dominating the market²⁶; Slovenia – in which Martin Odlazek is the owner of circa 90% of local media outlets in Slovenia²⁷; and in Hungary where regional dailies have Fidesz-affiliated KESMA as the owner.²⁸ It is also interesting to note that in the cases of France and Austria (both scoring high risk), the media funding system continues to favour large media players with higher reach, thereby consolidating their monopolistic position. On the other hand, no major issues related to the ownership concentration were reported in Greece, Latvia, Germany, and Slovakia. Furthermore, in the case of *Petit press* in Slovakia, it is pointed out that “ownership concentration does not necessarily lead to economic dominance, given the continuous decline in sales and revenues of its local media outlets. Rather, it appears to be an economic necessity.”²⁹

As far as **distribution** is concerned (variable 21), serious issues with distribution related to the print sector were reported in Romania and Czech Republic. Decreased points of sale were registered in Croatia, Slovenia, whilst delayed distribution was reported as an issue in Bulgaria. Another alarming situation is in Poland, as reported by Katarzyna Vanevska, where due to the takeover of distributor “Ruch” by PKN Orlen, the distributor did not want to allow fair competition of independent local print media with its own titles. This led to the creation of an alternative distribution system. Not only are kiosks diminishing, but also post offices and home delivery services. However, the distribution serves the local media market well in Denmark, Finland, France, Germany, Hungary, Lithuania, Luxembourg, and Slovakia. Some of the best practices for distribution were noted in common public spaces such as cafés and squares (for example in France) or providing state subsidies to postal and delivery services (as in Finland and Lithuania). An interesting case is also that of Hungary, “where the distribution of local newspapers is outsourced, at least in the larger settlements, and the local newspaper is usually distributed together with commercial leaflets. In smaller municipalities, the municipality typically handles distribution itself.”³⁰

The analysis of the market indicator assesses **weekly audience reach** (variable 31) and the **willingness of the audience to pay for news** (variable 29). Several EU country researchers reported having

23 T. Blagojev, D. L. B. Da Costa, E. Brogi, J. E. Kermer, M. Trevisan, and S. Verza. News deserts in Europe: Assessing risks for local and community media in the 27 EU member states (technical report). Florence: CMPF, 2023, p. 9.

24 M. Beaufort and A. Schulz-Tomancok, “Austria” chapter.

25 T. Blagojev, D. Borges, E. Brogi, J. E. Kermer, M. Trevisan, and S. Verza, ‘News deserts in Europe: Assessing risks for local and community media in the 27 EU member states’, (technical report). Florence: CMPF, 2023, p. 9.

26 E. Stur and A. Cepaite Nilsson, “Sweden” chapter.

27 R. Biljak Gerjevič, “Slovenia” chapter.

28 G. Polyák and A. Urbán, “Hungary” chapter.

29 M. Urbániková, “Slovakia” chapter.

30 G. Polyák and A. Urbán, “Hungary” chapter.

issues in retrieving such data. Seven EU countries (Austria, Bulgaria, Czech Republic, Germany, Hungary, Italy, and Latvia) reported that the weekly audience reach has decreased scoring high risk, while in France and Spain, it remained stable (low risk). Four out of five countries reporting no data on this issue consider it to be a high risk (Cyprus, Estonia, Luxembourg and Slovenia).

Concerning the willingness to pay for local news, the risk ranges from medium to very high risk. In most cases, people are not willing to pay for the news and this is the case across different media sectors. A very high risk is reported in the Czech Republic, Greece, Hungary, Romania and Slovakia. The main issue in Slovakia is that the local newspaper market is distorted because of the considerable number of municipality-owned media and commercial newspapers distributed for free which creates unfair competition for other privately owned media.³¹ Furthermore, the widespread availability of free daily newspapers, coupled with a continuing decline in traditional newspaper sales, and a relatively low interest in local news compared to other member states, are indicative of a low willingness to pay for local news in this country. In Greece, local radio and TV stations are distributed free of charge. As a result, researchers, Lambrini Papadopoulou and Ioannis Angelou, point out that this may contribute to peoples' unwillingness to pay for local news. In Hungary, crowdfunding and paywall are the most prevalent models, primarily for national media, however, these models are not viable for sustaining local media outlets³². In Romania, only 16% of respondents are willing to pay for online news³³. In the Czech Republic, according to researchers Lucie Sýkorová and Lenka Waschková Čísařová, local media are financed via subscriptions, advertising and newsstand sales, however, their main source of funding is still advertising, and the subscriptions are in decline.

A high risk is reported in Bulgaria, Denmark, France, Ireland, Italy, Latvia, Poland and the Netherlands. In France, people are paying for local news mostly via subscriptions (regional daily and local weekly print and online media) but subscription rates are reported to be declining here too. In Latvia, with a very low number of people that are willing to pay for news, donations and crowdfunding are not common. Donations are also very rare in Bulgaria. In the Netherlands, the highest willingness to pay for news is "for citizens who prefer podcasts, news alerts and online forums"³⁴. In Denmark, "most people are not willing to pay via subscription-based models, pay-per-article models, newsstand sales, voluntary donations, crowdfunding" and they expect the media to finance themselves via advertisements.³⁵

A slight rise in subscriptions was reported in Austria (at least for "digital services of legacy media deemed trustworthy"),³⁶ Finland, Spain, and Sweden. However, the situation in general is still concerning as there is no country that reports low or very low risk for variable 29 concerning the willingness to pay for local news.

Finally, in terms of **sources of funding for innovation specifically for the local news sector** (variable 30), there are none in Cyprus, Czech Republic, Greece, Lithuania, and Slovakia, which all scored a "very high risk" evaluation. When these funds are available, the issues arise when local media are competing with national ones (e.g. in Romania, high risk) or are related to a lack of capacities for project writing and reporting (e.g. in Estonia, high risk). According to the French researcher Franck Bousquet, funding is available for local media to support innovation, however it is given to "traditional players" (medium risk). The situation is more positive in Denmark (Danish Innovation Fund³⁷ and New Media Agreement³⁸); the Netherlands (Dutch Journalism Fund,³⁹ Dutch Fund for in-depth Journalism⁴⁰); and Belgium (Project subsidy

31 M. Urbániková, "Slovakia" chapter.

32 G. Polyák and Á. Urbán, "Hungary" chapter.

33 N. Newman, R. Fletcher, K. Eddy, C.T. Robertson and R. Kleis Nielsen. 'Reuters Institute Digital News Report 2023'. 2023, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf

34 Y.de Haan, "The Netherlands" chapter.

35 S. Simonsen, "Denmark" chapter.

36 M. Beaufort and A. Schulz-Tomancok, "Austria" chapter.

37 "Grand Solutions: Digitization, Technology and Innovation | Innovationsfonden," n.d. <https://innovationsfonden.dk/en/p/grand-solutions/grand-solutions-digitization-technology>.

38 Kulturministeriet, "Medieaftale for 2022-2025: Den demokratiske samtale skal styrkes", May 2022, https://kum.dk/fileadmin/kum/2_Kulturomraader/Medier/medieaftaler/2022-2025/Medieaftale_for_2022-2025_Den_demokratiske_samtale_skal_styrkes_21maj.pdf

39 Stimuleringsfonds voor de Journalistiek. "Dutch Journalism Fund - SVDJ." SVDJ, December 2023. <https://www.svdj.nl/dutch-journalism-fund/>.

40 "Home - Fonds Bijzondere journalistieke projecten." Fonds Bijzondere Journalistieke Projecten, January 2024. <https://fondsbjpp.nl/>.

digital transformation for Flemish part)⁴¹ - which all scored a very low and low risk evaluation. Apart from various government bodies, funding is also coming from public funds from the EU Commission (Creative Europe⁴² for example), European Journalism Centre,⁴³ Baltic Centre for Media Excellence,⁴⁴ Open Society Foundations,⁴⁵ the Google News Initiative⁴⁶ and Google News Showcase,⁴⁷ just to name a few.

Recommendations

To the EU, Member States and local public authorities:

- Systematically and regularly collect and publish data on market shares and revenues for local and community media outlets, as well as on the amount of financial support these media receive from public sources by designated public authorities. More transparency related to the functioning of local and community media and modes of financing would also contribute to improving citizens' trust in these media.
- More locally focused subsidies schemes that would include clear, transparent and arm's length criteria for fund allocation as well as an evaluation of the outcome and/or impact of these subsidies. It is also important that these subsidies are not overburdened with technical and bureaucratic demands due to lack of capacities of local media outlets to fulfil excessive requirements.
- The recognition that journalism is a public good which should prompt considerations on implementing direct taxes for digital ads with the proceeds allocated to local journalists' salaries or fees.

To journalistic organisations, journalists and newsrooms:

- Supporting the diversification of revenue streams of local media to be less dependent on advertising and/or state support.

To representatives of academia:

- Develop novel models and methodologies for measuring the degree of concentration of information services within local contexts, considering the complementarity and substitutability between media outlets and media formats for both users and advertisers.

To other stakeholders:

- Support the inclusion of local and community media in audience studies analyses of circulation, readership, viewership and/or online traffic data. It should ideally include all media sectors, and this can be done by public bodies and/or professional organisations. Local media are in a difficult position as they do not have enough financial and human resources to conduct audience studies. This would assist them very much in understanding their audience and creating programmes to fit their needs.
- Pay particular attention to municipal media economically privileged positions within the media market as it creates unfair competition for other media players.
- Assess public information needs at the local level through discussions with community members, in order to identify topics relevant for that local community. This can be organised by the local state bodies and other relevant stakeholders such as CSOs, journalist organisations, and it can also be used as a baseline for state support.

41 Vlaanderen. "Projectoproep Digitale Transformatie." Departement Cultuur, Jeugd & Media, n.d. <https://www.vlaanderen.be/cjm/nl/media/subsidies/projectoproep-digitale-transformatie>.

42 European Commission. "Creative Europe." Culture and Creativity, February 2024. <https://culture.ec.europa.eu/creative-europe>.

43 European Journalism Centre. "Funding." EJC.net, February 2024. <https://ejc.net/funding>.

44 Baltic Centre for Media Excellence. "Baltic Media," n.d. <https://bcme.eu/en/home-page>.

45 Open Society Foundations. "Open Society Foundations," n.d. <https://www.opensocietyfoundations.org/>.

46 Google. "About - Google News Initiative," n.d. <https://newsinitiative.withgoogle.com/about/>.

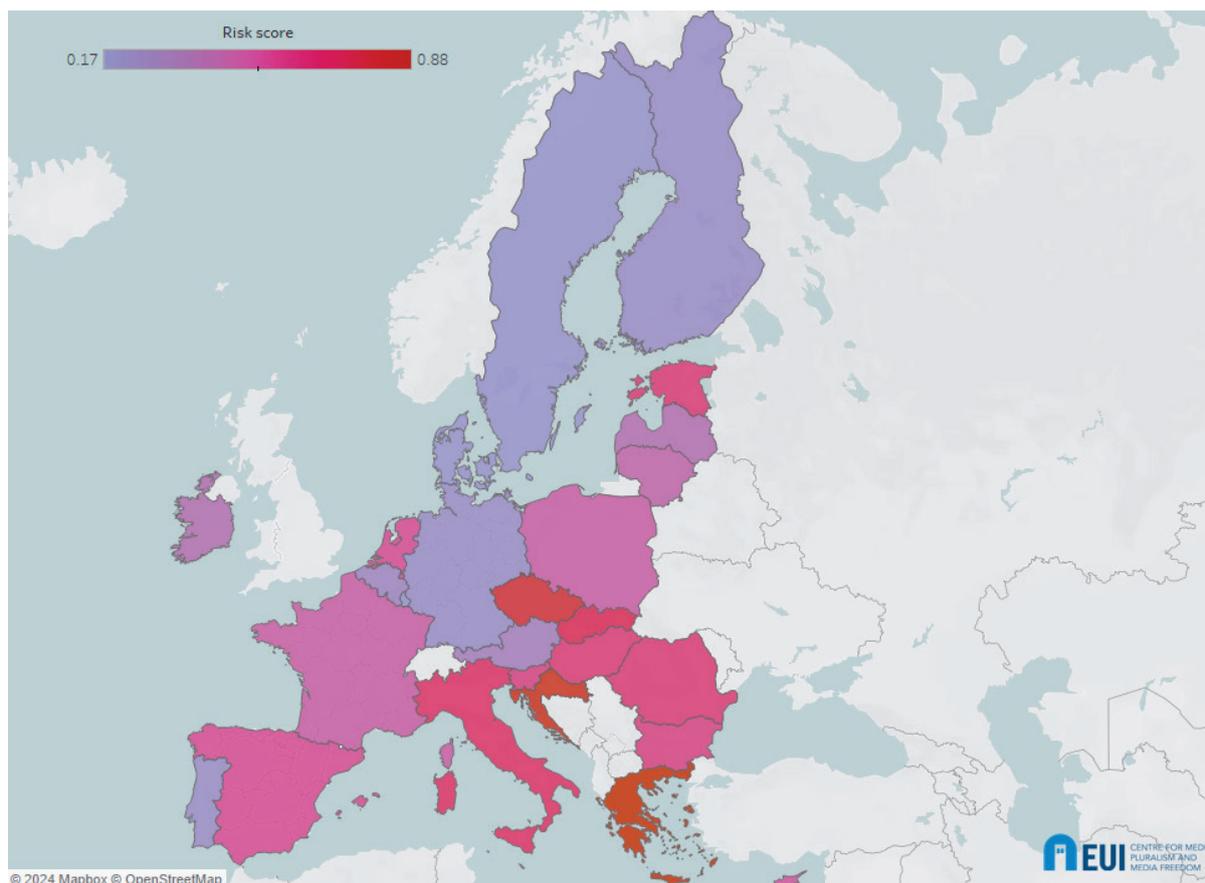
47 Google. "Google News Showcase." blog.google, n.d. <https://blog.google/products/news/google-news-showcase/>.

Safety of local journalists

The results of the LM4D research for the indicator safety of local journalists, which aims at assessing different aspects of the local journalistic profession—such as working conditions, physical safety, editorial independence, professional standards, and the incidence of SLAPPs against local journalists—revealed a varied scenario across the European Union.

As shown in Figure 3, the indicator on safety of local journalists presented the **highest risk score in the following countries: Croatia, Estonia, Greece, Italy, Slovakia and Spain** and is associated with the working conditions of local journalists.

Figure 3: Risk for the indicator “Safety of local journalists” in the 27 EU Member States



Analysing the single variables composing this indicator, the variable investigating the **working conditions of local journalists** (variables 32-33) reveals that they are in general considered at risk by local researchers. Most of the countries analysed reported that employed local journalists face poor working conditions with salaries below the average in the country, and sometimes even close to the minimum wage. Second, though in most of the countries analysed, employed journalists are eligible for social benefits, such as unemployment and/or parental leave, the absence of collective agreements is often the case. Moreover, in recent years, local media outlets have opted to hire freelancers or self-employed journalists as a way of cutting costs. The salaries of freelancers are usually no higher than those of employed journalists and freelancers are not eligible for social security benefits, unless they contribute voluntarily to the social security system.

In this regard, local researchers from those countries assessed at high or very high risk for variables 32 and 33, reported, for instance, that in Croatia the salaries of local journalists are between 500 to 700 euro and vary between 531 and 1,062 euro for freelancers, while the minimum wage is established at 560 euro (January 2023). Moreover, less than 50% of the members of the Trade Union of Croatian Journalists have full-time working contracts. Furthermore, the situation of freelancers is at a higher risk because their

remuneration is below the average net monthly wage in Croatia.⁴⁸ Likewise, in Italy, the average yearly compensation for a freelance journalist can be estimated around 20,000 euro and the average salary of an employed journalist ranges from 19,000 to 32,000 euro against an average salary in the country that amounted to 29,996 euro in November 2023.⁴⁹ In Slovakia, besides the deterioration of the economic situation of local media and the decrease in the number of local journalists, a further problem reported by the local research team is the lack of personnel in local outlets, which sometimes have only part-time staff or employ only a single journalist.

In relation to **physical or online threats and attacks against local journalists** (variable 34), the data collection reveals in general a stable or decreasing trend in physical attacks or threats in the last five years, with six countries scoring high or very high risk: Croatia, Germany, Greece, the Netherlands, Slovenia and Spain. Some local researchers argue that local journalists are more at risk because of their proximity to the community they cover, whereas others have different views. Frank Bousquet, the French researcher, for instance, argues that in France more than half of the attacks found in the Mapping Media Freedom Platform concern local journalists.⁵⁰ Jan Kalbhenn, the German researcher, reaches the same conclusion based on a study from the European Centre for Press and Media Freedom (ECPMF) named "Enemy Image Journalist: in 7: Occupational Risk Proximity."⁵¹ Conversely, the Dutch researcher, based on interviews conducted with local publishers, reports that local journalists face more online than physical harassment because they are well-known in the community, and this allegedly prevents physical attacks. On the same lines, Elisabeth Stur and Asta Cepaite Nilsson, the local Swedish researchers, point out that local journalists are not as much affected by physical and online threats as journalists working for national media.⁵²

Among the countries that scored high or very high risk for variable 34, Croatia reports that most attacks are not physical but verbal threats, including online ones; in the last 5 years most of them were connected to corruption cases or the Covid pandemic (e.g. anti-mask or anti-vaccine activists).⁵³ In Greece, the country at the highest risk for this sub-indicator, a notable surge in threats and attacks against local journalists was reported, especially online.⁵⁴ Researchers contend that the existing legal framework seems to be ineffective in guaranteeing the prosecution of perpetrators and consequently in curbing this trend. Perpetrators can be local actors, including public figures and far right organisations. On a gender perspective, Yael de Haan, the Dutch researcher reported that in general female journalists are more susceptible to attacks if compared to the overall professional group.⁵⁵ Aggressions, intimidation, and threats affect the way 6 out of 10 female journalists perform their work.⁵⁶ Conversely, on a positive trend, in Bulgaria the number of entries of the Mapping Media Freedom repository and the Council of Europe's Platform indicates a decreasing trend in the past few years. Also, the Local Integrity System Index 2022 does not identify cases of physical attacks on local journalists and points to this as a positive fact.⁵⁷

Regarding the sub-indicator on **independence and professional standards of local journalists** (variables 35-36), several countries have reported on the absence of professional organisations, such as trade unions or media councils, representing journalists in general, and more specifically at the local level, which

48 Safe Journalists, 2021. Available at https://safejournalists.net/vadi_faq/indikator-1-5-posao-novinara-je-stabilan-i-zasticeni-su-na-radnom-mjestu/?lang=hr

49 See <https://quifinanza.it/lavoro/stipendio-giornalista-italia/239516/>. According to data from OECD the average annual wage in Italy in 2022 was USD 44 893. OECD (2024), "Average annual wages", OECD Employment and Labour Market Statistics (database), <https://doi.org/10.1787/data-00571-en>.

50 F. Bousquet, "France" chapter in this report.

51 J. Kalbhenn, "Germany" chapter in this report. See also: European Centre for Press and Media Freedom, ARTICLE 19 Europe, the European Federation of Journalists, Free Press Unlimited, International Press Institute and CCI/Osservatorio Balcani Caucaso Transeuropa (2023) Mapping Media Freedom: Monitoring Report (January to June 2023): <https://www.mappingmediafreedom.org/analysis/>

52 E. Stur and A. Cepaite Nilsson, "Sweden" chapter in this report.

53 D. Vozab and A. Čuvalo, "Croatia" chapter in this report.

54 Y. Angelou and L. Papadopoulou, "Greece" chapter in this report.

55 Y. de Haan, "Netherlands" chapter in this report.

56 Towards a safer haven: Advancing safety of journalists amidst rising threats in the Netherlands - Free Press Unlimited (2022): <https://www.mfr.eu/netherlands-towards-a-safer-haven-advancing-safety-of-journalists-amidst-rising-threats-in-the-netherlands/>

57 Transparency International Bulgaria. 'Local Integrity System in Bulgaria: catalogue of good practices', 2022: <https://transparency.bg/local-integrity-system-in-bulgaria/?lang=en>

is aggravated by the decrease in membership of such organisations. Local journalists are under more pressure than national journalists regarding their independence from local politics, local businessmen and advertisers. In terms of professional standards, a common claim among the local researchers from Croatia, Czech Republic, Romania and Lithuania is that there is a lack of or ineffectiveness of rules and codes of ethics adopted by local media outlets and followed by local journalists. The quality of news/texts is also reported to be lower at the local level.

The data collection demonstrates that countries are more at risk relating to variable 35 than to variable 36. The former aims to evaluate the role of journalists' associations in guaranteeing editorial independence and professional standards at the local level, whereas the latter evaluates the professional standards of journalists at the local level. In relation to variable 35, seven member states were assessed as high risk (Croatia, Greece, Hungary, Italy, Lithuania, Poland and Malta) and four were assessed at very high risk (Czechia, Estonia, Romania and Slovakia). On this point, Marína Urbániková, the Slovak researcher, explained that local media outlets are under the control of local politicians, publishing exclusively their opinion and arguments with limited space for opposing views or criticism.⁵⁸ With regard to variable 36, only five countries are assessed at high risk—Czechia, Croatia, Cyprus, Hungary and Slovakia—and no country was assessed at very high risk. A common argument raised by these member states is that professional associations play a minor role in guaranteeing professional standards which, at the end of the day, depend heavily on internal editorial staff.

Finally, with regards to **Strategic Lawsuits Against Public Participation (SLAPPs)** - variable 37. The data collection shows that most of the countries scored medium risk for this variable and seven scored high or very high risk: Croatia, Czechia, Cyprus, France, Greece, Ireland and Italy. A common claim highlighted by local teams is that this type of lawsuit may have a deterrent effect on the freedom of press. The usually lower income of local journalists when compared to national journalists makes them more vulnerable to SLAPPs; i.e., intimidating lawsuits brought by powerful subjects that require expenses for legal assistance to be faced. Local newsrooms are often unable to provide legal assistance for their employees, and even less for their freelancers. SLAPPs are particularly problematic in Croatia where, in 2023, there were about 945 active lawsuits against journalists and media outlets in general, according to data from the Croatian Journalists Association. The Croatian publisher *Hanza Media*, from regional daily *Slobodna Dalmacija*, as well as *Dalmatinski* portal and *Novi list* all feature as defendants in a large number of such lawsuits against regional and local media outlets; lawsuits which can be initiated by politicians, judges, and businesses. Also, the Croatian public service broadcaster is notorious for filing lawsuits against its own employees and members of the Croatian Journalists Association who criticise the service. Likewise, in France, local and online investigative journalists are more exposed to SLAPPs according to the French researcher for this study. Examples in this regard are the cases in Brittany in the agri-food industry; *Le Poulpe*, in Rouen, was sued by a pollution control company, and *Médiacités*, was sued by the local authorities and businesses in every town where it produces investigative reports. In Ireland and Italy the main problems reported by local researchers are their strict defamation rules and large pay-outs against media in defamation cases, which work as incentives to SLAPPs.

Recommendations

To the EU, Member States and local public authorities:

- Set up and/or strengthen a legal framework to protect local journalists against SLAPPs, including the decriminalisation of defamation.
- Monitor SLAPP cases against local journalists.
- Set up and/or strengthen inclusive labour legislation that protects and takes into account (local) journalists.

58 M. Urbániková, "Slovakia", chapter in this report. See also, Transparency International Slovensko, 'The crisis of local journalism in the V4 countries and the specific role of municipal newspapers in it', 2022: https://www.oziveni.cz/wp-content/uploads/2023/01/Policy_Paper_V4_TransparencyInternational_Slovakia.pdf

- Support continuous training and professional development of local journalists.
- Implement the EU Safety recommendations also at local level, such as training with local police.

To journalistic organisations:

- Enhance and support the role and work of journalists' associations and unions at the local level. There exists a lack of cohesion among local journalists, as associations or unions are primarily centred in the capital. This results in local journalists experiencing a sense of isolation. This entails establishing connections, support networks, or initiatives that bridge the gap, ensuring that local journalists are not left in isolation.
- Promote the adoption of collective agreements that protect the working conditions of local journalists.
- Monitor the working conditions of local journalists and be in dialogue with employers on issues regarding safety at work including from online harassment.
- Promote continuous training and professional development of local journalists.
- Promote and support compliance with codes of ethics/conduct in journalism.
- Support and promote collaboration between local journalists and local stakeholders, such as schools and education organisations.

To the media and newsrooms:

- Support continuous training and professional development of local journalists.
- Ensure decent working conditions for local journalists and compliance with the labour laws.
- Ensure risk assessment and procedures to protect staff at local level.

Editorial independence

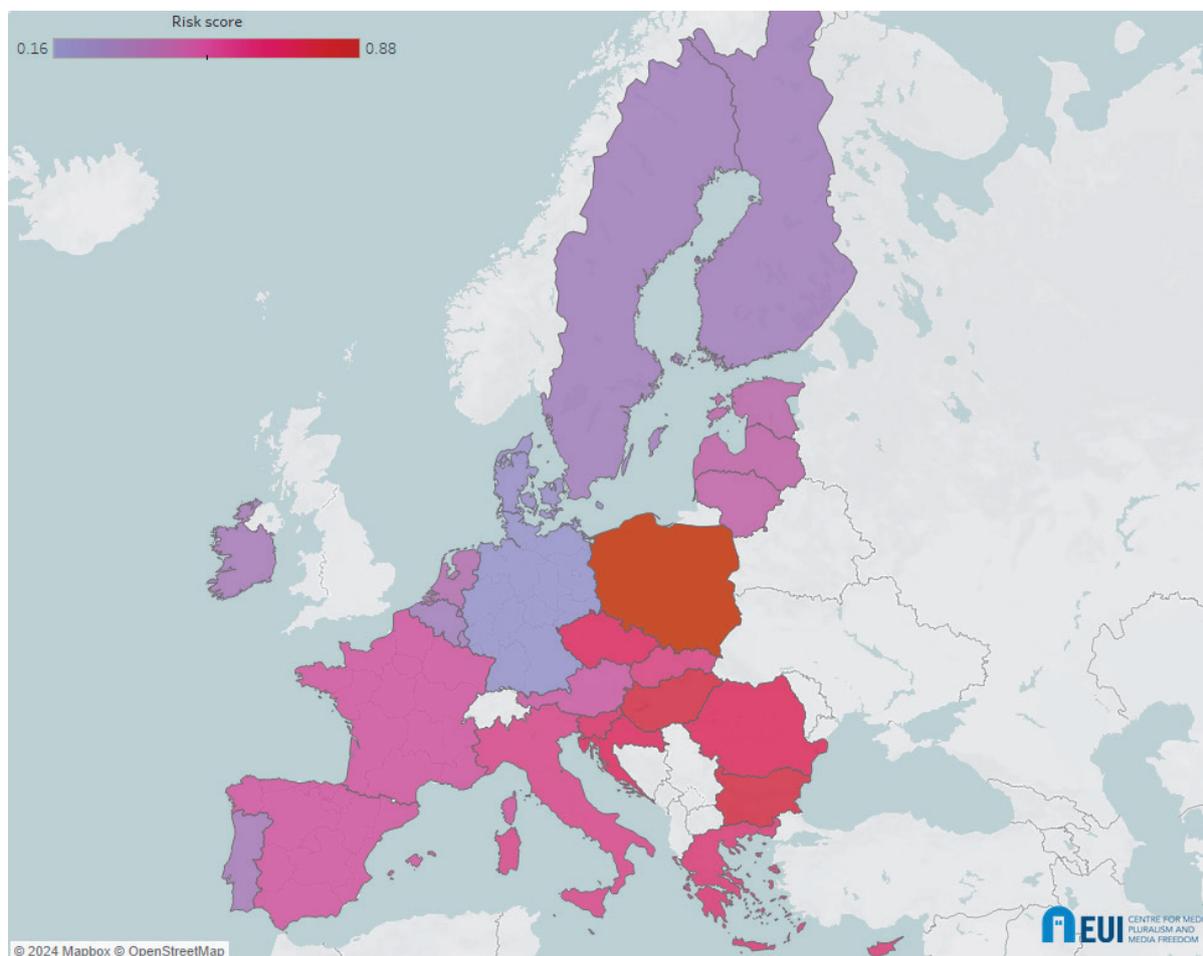
This indicator assesses the independence of local media from political and commercial pressures. It investigates the risks of conflict of interest, the fairness and transparency in the allocation of state subsidies and state advertising, the governance of the local branches of the media authority and of the PSM, and the diversity of news content.

As shown by Figure 4, **Central and Southeastern Europe (CEE and SEE) are the areas most affected by political and commercial control over the local media, with a deleterious effect on trustworthiness and diversity of information sources.** Poland and Malta stand out as the countries in most jeopardy in these terms, followed closely by Hungary and Bulgaria, which place at the highest margin of the high-risk band. The Czech Republic, Croatia, Slovenia, Romania, Greece and Cyprus also score an overall high-risk level, with peaks of concern under specific subdomains. In these member states, the results clearly depend on the interrelation between different sources of concern, reflecting a situation where the local media sphere is extensively captured by political and commercial forces, often acting together in a close entwinement of direct or vested interests.

While the same typologies of control apply to other parts of Europe as well—with medium levels of risk emerging in Slovakia, Spain, France, Italy, Austria, and the Baltics—the extent of political and commercial leverage on local news media is decisively limited. In comparative perspective, one of the reasons for this is a greater presence and functionality of the regulatory and self-regulatory framework, which still might be considered deficient by several degrees (i.e. in terms of completeness or actual implementation). Moreover, in these member states, mechanisms of influence over the local media sphere are not as diffused and intertwined as in the case of high or very-high risk countries, emerging in some specific subfields of investigation only, or from time to time.

Ireland, Luxembourg, Portugal, Sweden, The Netherlands, Belgium, and Finland are assessed as being low risk with regards to editorial independence, while a very-low risk is found only in Germany and Denmark. In these well-performing member states, the extent of control over the local media sphere is minimal, attributable to a combination of effective regulatory and self-regulatory safeguards, as well as a sensitive public sphere and a political culture actively debating cases of concern that might still arise. At the same time, it is apparent that, in some countries, the reduced presence of regulatory provisions might lead to some forms of control passing undetected, and subsequently, undebated.

Figure 4: Risk for the indicator “Editorial independence” in the 27 EU Member States



By looking at the EU aggregate results per variable, the risk related to the **political control that might be exerted via direct or/and indirect ownership means** (variable 38) is assessed as medium, rather close to the high-risk band. The geographical distribution of risk shows that this is clearly driven by Central and Southern European member states, where the ownership structure of local media outlets is significantly affected by the presence of political actors or their intermediaries, such as family members or friendly business people.

The countries most at risk are Slovakia, Malta, Poland, Cyprus, Bulgaria, Romania, Italy, Czech Republic, Slovenia, Croatia, Lithuania, and Hungary. While Malta represents a clearcut example of a party-media system,⁵⁹ Poland and Hungary are rather indicative of a situation in which political control over local media is exerted through state-affiliated structures, showing troublesome similarities in the way the local media sphere is captured by political power.⁶⁰ Evidence of direct control in the local private audio-visual sector has been detected, for instance, in the Czech Republic, as exemplified by the cases of ZAK TV and

59 The Partit Laburista (PL), currently in government, and the Partit Nazzjonalista (PN), in opposition, own their respective televisions and newspapers, as reported by Vassallo in the Maltese country chapter. However, it has to be noted that the line between local and national outlets cannot be drawn as clearly as in other countries.

60 In Poland, the state-owned Polska Press brings together a significant section of regional titles. Similarly, in Hungary, the county newspapers that are part of KESMA, openly and unilaterally convey the government narrative.

RTM+⁶¹, where the law does not prevent local politicians from ownership of or within media companies.⁶² In Slovenia, media companies are not addressed in specific terms by the general law on integrity and prevention of corruption, with blatant evidence of direct political ownership control over the local digital native sector.⁶³ With specific regard to indirect ownership control via intermediaries, the political connections of the Croatian local television channels Z1 and Osječka Televizija proved particularly indicative.⁶⁴ Available regulatory safeguards might also fall unimplemented or severely affected by transparency problems, as demonstrated by the case of Italy.⁶⁵

In this subdomain, the presence of local government or municipal outlets emerges as a notable element of risk. For instance, the Slovak local media sector is commanded by outlets produced by local municipalities and self-governing regions and utilised by local government leaders for self-promotion. In the Czech Republic the number of freely distributed town hall periodicals is considerably higher compared to the one of independent local periodicals, as reported by Urbániková. In these terms, significant evidence emerged also in Poland⁶⁶ and Slovenia.⁶⁷ Through this kind of publication, local authorities are able to exert a high degree of informative control, especially where the local private sphere is underdeveloped.

Variable 39 relates to the actual **fairness and transparency in the distribution of State subsidies to local media outlets**. In aggregate terms, this issue shows a low-risk result, at the European level, close to the medium-risk band. The risk is lowered by some specific countries (such as Germany, Denmark, Portugal, Lithuania, and Spain) offering advantageous subsidisation schemes to local media outlets.⁶⁸ Several other member states recorded moderate to medium-risk deficiencies, depending on limited issues, mostly related to adequacy of the criteria, their implementation, or the fact that distribution proves fair and transparent only in one category (direct or indirect). In the Italian press industry, for example, Mangani reports that “two identical media outlets (in terms of firm size, target audience, and content variety), have unequal resources solely due to their different legal statutes”.⁶⁹ When it comes to distribution of direct subsidies, the Polish case proved once again particularly indicative of biased practices.⁷⁰

Considering the **distribution of state advertising to local outlets** (variable 40), the aggregate risk level peaks significantly. In fact, its unfair and non-transparent allocation has emerged as the most concerning issue in the editorial independence indicator, scoring a high-risk. While advertising from the state and/or state-controlled companies, or other local public institutions can certainly help local media outlets survive

61 In the Czech Republic's country chapter Sýkorová reported that in the region of Pilsen, “there is just one private local TV station (ZAK TV), and this is owned directly by a local politician, with a significant part of its income from the town hall, regional council and other public institutions. Similar projects are in several other regions as well, like RTM+, which was in 2023 fined by the regulator for threatening editorial independence”.

62 The amended Conflict of Interest Act only prevents MPs, senators, members of the government and the president from owning media. Moreover, it still presents shortcomings.

63 Several digital-only local media are directly managed or affiliated with representatives of major political parties, and specifically the current opposition party, SDS (Biljak Gerjevič, 2024).

64 As emerges from the Croatian country chapter, “There were cases of local television stations whose owners had ties to political parties. For example, people and companies in the ownership structure of the local television Z1 were reported to be connected with the party Domovinski pokret”. See S. Paparella, Godinu dana nakon kupnje, misteriozni vlasnik već prodaje Z1, Zagrebi.hr, 2022, <https://zagrebi.hr/godinu-dana-nakon-kupnje-misteriozni-vlasnik-vec-prodaje-z1/>. Moreover, “Osječka televizija was bought by an owner connected to the party HDZ in a famous corruption case in 2010- although the ownership changed in the meantime, there is still a possibility of political control”. See H. Šimičević, Gradonačelnika ima tko da snima, Portal Novosti, 2022, <https://www.portalnovosti.com/gradonacelnika-ima-tko-da-snima>.

65 The regional branches of the Italian media regulator AgCom, so-called Corecoms, claim to regularly monitor potential conflicts of interest in critical situations. However, as evidenced in this study by Mangani, there is no evidence of measures addressing the dangerous connections between local politics and media that have emerged from the research. Moreover, transparency of available databases proves severely limited.

66 In Poland, Vanevska reports that “more than 55% to 60% of Polish communes run press (paper and online versions) that pretend to be part of the local media market. These are publications that are fully controlled by the authorities issuing them and which do not offer reliable information”.

67 Biljak Gerjevič evidences that municipal magazines represent a concerning issue in Slovenia as well, as “they often serve as public relations outlets for the local mayors and their parties, while financed from public budgets”

68 The low-risk result might also relate to the fact that indirect subsidies are generally less affected by unfairness and opacity in distribution, compared to direct ones, ultimately balancing the extent of risk in this subdomain.

69 Moreover, the author explained how “some experts argue that there is still a web of interests and political and patronage-based divisions that influence the current distribution of subsidies to local media”

70 As reported by Vanevska “Funds awarded through the National Institute of Freedom (state subsidies) are granted for the outlets close to the ruling party. The rules and procedures for granting them are unclear, unreliable and non-objective”.

in a non-viable market, its preferential distribution to complacent media can be turned in such a way as to weaken independent and critical voices, ultimately contributing to the desertification of the information space. Again, the research proves that this is the case particularly in CEE and SEE countries, where the participation of politicians, parties, or connected actors in the ownership structure of regional and local media seems to be linked to the preferential allocation. As reported by Polyák, in Hungary the county newspapers that are part of the KESMA network have a secured funding base thanks to a significant amount of public advertising. In Croatia, state subsidisation schemes work as covert state advertising.⁷¹ In Slovenia, biased practices are backed by the lack of standards, making it “impossible to sanction violations, since they are not actually violations”,⁷² Biljak Gerjevič reports. As emerged in the course of the present study, this can be complicated by the presence of municipal outlets in the advertising market, which further disrupt the media viability of independent local media.

The subdimensions of risk previously described and their deleterious interrelation are often backed by lack of, or inefficient self-regulation protecting editorial content from commercial and political interference, which allows for additional forms of control.

In aggregate terms, **commercial influence over local editorial content** (variable 41) is assessed at a medium-risk in the European local media sphere. As explained in the Italian country report, “local media rely heavily on advertising investments, which can lead to commercial considerations influencing editorial content. For example, the media coverage of “big spenders” may be influenced to avoid negative portrayals. However, for very small media companies, advertisers are also small in scale, and their influence on editorial content is limited. On the other hand, numerous local media outlets, particularly those operating in the online sphere, rely heavily on “clickbait” tactics. This implies that the determination of news values (i.e., newsworthiness) often leans towards sensationalising events and stories for coverage”. Research quoted by Vozab and Čuvalo demonstrates that in Croatia “journalists recognise strong commercial pressures,⁷³ and that pressure towards sensationalism and profit-making has increased over time”.⁷⁴ This is backed by severe deficiencies when it comes to laws and/or self-regulatory measures stipulating the obligations of journalists and/or media outlets set against commercial interests. Measures that prevent local journalists from having the ability and/or incentive to base editorial decisions on commercial interests, as well as measures that make sure that editorial and journalistic content is strictly separated from marketing, advertising and other commercial activities, are often cosmetic. In Slovenia, for instance, there are no safeguards ensuring that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests. In Greece’s country chapter Papadopoulou and Angelou report that laws and self-regulation, “are ineffective, particularly in smaller societies, where commercial influence on editorial content is more prevalent”. This also relates to the partial availability and ineffectiveness of social protection schemes—or other legal and economic guarantees established by collective agreements and/or self-regulation—to avoid precarious working conditions, which might lead to surrender to commercial pressures.

A medium-risk is also scored in terms of **political influence over editorial content** (variable 42). As in the case of commercial influence, regulatory and self-regulatory instruments are often not implemented, or they are ineffective. This often results in the dependency of editorial lines on the political activity of the owners and publishers, as well as in the violation of ethical standards by journalists favouring politicians. Once more, major concerns are located more in CEE and SEE, with Poland, Malta and Hungary presenting very high-risk results. For Poland, Vanevska reports the attempts “to solicit / bribe journalists from inde-

71 The line between state subsidies and state advertising is blurred. The analysis found that “contracts between some regional and local governments and media after the public calls for subsidies specify that the media are obliged to report and promote the activities of local governments to receive a subsidy. For example, a local television channel made contracts with local governments offering ‘production, filming, and broadcasting of specialized interviews’ in their news and current affairs programmes. Therefore, local budget subsidies are often a way of covert state advertising.” See: Skender, *Analiza financiranja lokalnih medija javnim novcem* and also Šimičević, *Gradonačelnika ima tko da snima*.

72 D. Savič, ‘Državne oglaševalske pogodbe so naravne nesreče’, *The L Files*, <https://www.dsavic.net/2022/09/13/drzavne-oglasevalske-pogodbe-so-naravne-nesrece/>

73 H. Popović, ‘Commercialization and Privatization of Media in Southeast Europe: A Wolf in Sheep’s Clothing?’ *The Political Economy of Communication*, v. 3, n. 1, 2015, ISSN 2357-1705. <https://www.polecom.org/index.php/polecom/article/view/49/240>

74 Z. Peruško, A. Čuvalo and D. Vozab, *Journalists in Croatia*, *Worlds of Journalism Country Report*, 2016, https://epub.ub.uni-muenchen.de/29703/1/Country_report_Croatia.pdf

pendent media, offering them work in promotion departments or in newspapers run by local governments”. While in these member states the line between political and commercial influences is particularly blurred and of concern⁷⁵, this does not mean that well-performing countries are not affected by the same issues. As reported by Lindén and Grönlund in the Finnish report, “local commercial media in Finland are still dependent on advertisement - as digital subscriber revenues only grow slowly and mainly go to national media companies. Hence, newsrooms need to balance the watchdog ideal to scrutinise local companies with the need to have a sustainable business model.” Moreover, a 2020 survey by the Finnish Newspapers Association (currently News Media Finland) indicates clear evidence of commercial and political interference.⁷⁶ Nevertheless, according to Lindén and Grönlund “the fact that influential people want to have an impact on editorial decisions, does not mean that editors have no choice but to agree: negotiating attempts to influence editors is considered part of the daily journalism routine”.

The variable assessing whether the **media authority’s remit over local media, and the independence of its actions** (variable 43), scores a low-risk at the EU level. This result is driven by several countries that indicated a very-low of risk in this sub domain (Portugal, Ireland, Belgium, The Netherlands, Germany, Denmark, Luxembourg, Slovakia, Austria, and Cyprus). However, several other member states present medium-risk levels. For instance, in Italy the independence of Corecoms, the local branches of AgCom, is questionable.⁷⁷ High risk levels are detected only in Greece, Poland, and Malta. In these countries particularly, the weakness of media authorities and their capture by political forces, leave the local media sphere either unprotected in terms of proper regulation, or without effective sanctioning measures in case of violations.

In aggregate terms, significantly higher concerns are detected when it comes to the extent of **independence of PSM/or PSM local branches** (variable n.44), scoring an overall medium-risk. The analysis shows that the interference of politics in the governance structures of national PSMs often replicates at the level of local branches; a situation that is particularly problematic in countries where the private local media sphere is either absent, or already captured. Poland, Malta, Greece and Italy constitute clear cut examples. In Poland, the only country scoring a very-high risk level along with Malta, “the specific takeover of public media by the former ruling party had an impact on the situation of the regional branches of both TVP and Polish Radio.”⁷⁸ In Greece, the size of the small network of local correspondents or branches network “has been shrinking over time and is insufficient to cover the whole country.” Moreover, the “New Democracy’s press officer was appointed as ERT’s president. These practices are quite common as every new government tends to appoint a new person to these positions.”⁷⁹ With regard to the Italian PSM, RAI, there is limited information on the local branches’ independence from political influences to be found. However, practical examples suggest this is the case. Austria also proved to be a case of concern: as reported by Beaufort and Schulz-Tomancok, “The ORF Act (theoretically tries, but) in practice fails to guarantee independence from political influence at the national as well as at the regional level, which is partly about the rules that enable the government to appoint at least a simple majority of the Foundation Council, sufficient for most of its decisions.”

75 In Malta Vassallo explains that “commercial entities have strong influence on both the PL and the PN, in view of weak party financing regulations, resulting in both direct and indirect pressure on newsrooms”. In Hungary, Polyák reports how in the case of the KESMA county papers, “potential commercial advertisers—which are typically few in the Hungarian local market—often place ads in these papers for political reasons”. In Bulgaria, in spite of the presence of legal and self-regulatory provisions for editorial independence, “Political actors, including local government institutions, are among the leading sources of external pressure in all local media sectors. In parallel, local media are reluctant to investigate issues that could affect local advertisers or the non-media business interests of their owners”, as explained in the related country chapter.

76 According to the survey quoted by the authors, “four out of five (79%) newspaper editors had experienced attempts to influence the journalistic content within the last couple of years. Four-fifths (82%) of editors-in-chief said that politicians had tried to influence the content of their publication. In addition, three quarters of editors faced attempts to influence from either readers (75%) or advertisers (72%)”. Kivioja, Pasi (2020) Joka kuudes sanomalehden päätoimittaja kokenut vaikutusyrityksiä oman talon johdosta, <https://suomenlehdisto.fi/joka-kuudes-paatoimittaja-kokenut-vaikutusyrityksia-oman-yrityksen-johdosta/>

77 This is because “the members of the regional branches are appointed by the Regional Council, based on the proposal of the President of the Region. Consequently, the regional political majority holds the power to appoint the members of the local Corecom (the committee responsible for monitoring the independence of local information)” Mangani explains.

78 See the Polish chapter in this report.

79 See the Greek chapter in this report.

The combined effects of the above-analysed subdimensions of the indicator editorial independence, inevitably have an effect on the **diversity of the local media news content**. Variable 45, focusing on this issue, indicates a medium risk, close to the high-risk band. The geographical representation shows that high-risk levels are particularly concentrated once again in CEE and SEE. However, most of the country teams across the rest of Europe only partially agreed that, in their respective countries, local media provide a diverse scope of stories, viewpoints and tone. In some member states, where the evidence of media capture over the local sphere is conspicuous, it is likely that the kind of stories and events that get reported are dependent on a political agenda, if not blatantly promoting governing local parties and mayors. Besides, the research reveals a lack of substantive studies to understand the extent of content diversity in the local media sphere.

Recommendations

To the EU, Member States and local public authorities:

- Effectively implement or set up regulation on conflict of interests and direct/indirect ownership control in the local media sphere. To carry out periodical monitoring in order to avoid cases of concern and to enable transparency mechanisms that would allow the public to access relevant information on ownership structures at the local level. To effectively regulate the issue of local governmental outlets.
- Ensure clear and transparent criteria for distribution of direct and indirect subsidies, which leave no room for arbitrariness. Funding must ensure proportionality, supporting the local and regional media environment (including smaller, innovative outlets), journalistic quality and democratic relevance. A more sophisticated system of subsidising independent journalism must be developed, which would pay sufficient attention to the support of digitisation and innovation in local media. A monitoring mechanism of the results has to be considered essential.
- Ensure clear and transparent criteria for the distribution of advertising from the state and local public institutions, together with regular evaluation of the quality of work of the media financed by this support, as well as evaluating the impact of state advertising on the local media market. This should also apply to publicly-owned companies.
- Update the laws on disguised advertising, and the protection of consumers, to the digital media environment.

To the media and newsrooms:

- To introduce self-regulatory rules to disclose any actual or potential conflict of interests by the owner of the media company that may affect the provision of news and current affairs content.
- To take measures with a view of guaranteeing the independence of editorial decisions, such as to guarantee that editorial decisions can be taken freely within the established editorial line of the media service provider (see EMFA, Article 6.2).

To journalistic organisations:

- Journalists' organisations (unions and associations), press and media councils and other bodies that are involved in the application of journalistic self-regulation, should foster compliance with self-regulatory measures that aim at editorial independence from commercial pressures. Policymakers and regulators could also assist them with appropriate measures.

To other stakeholders:

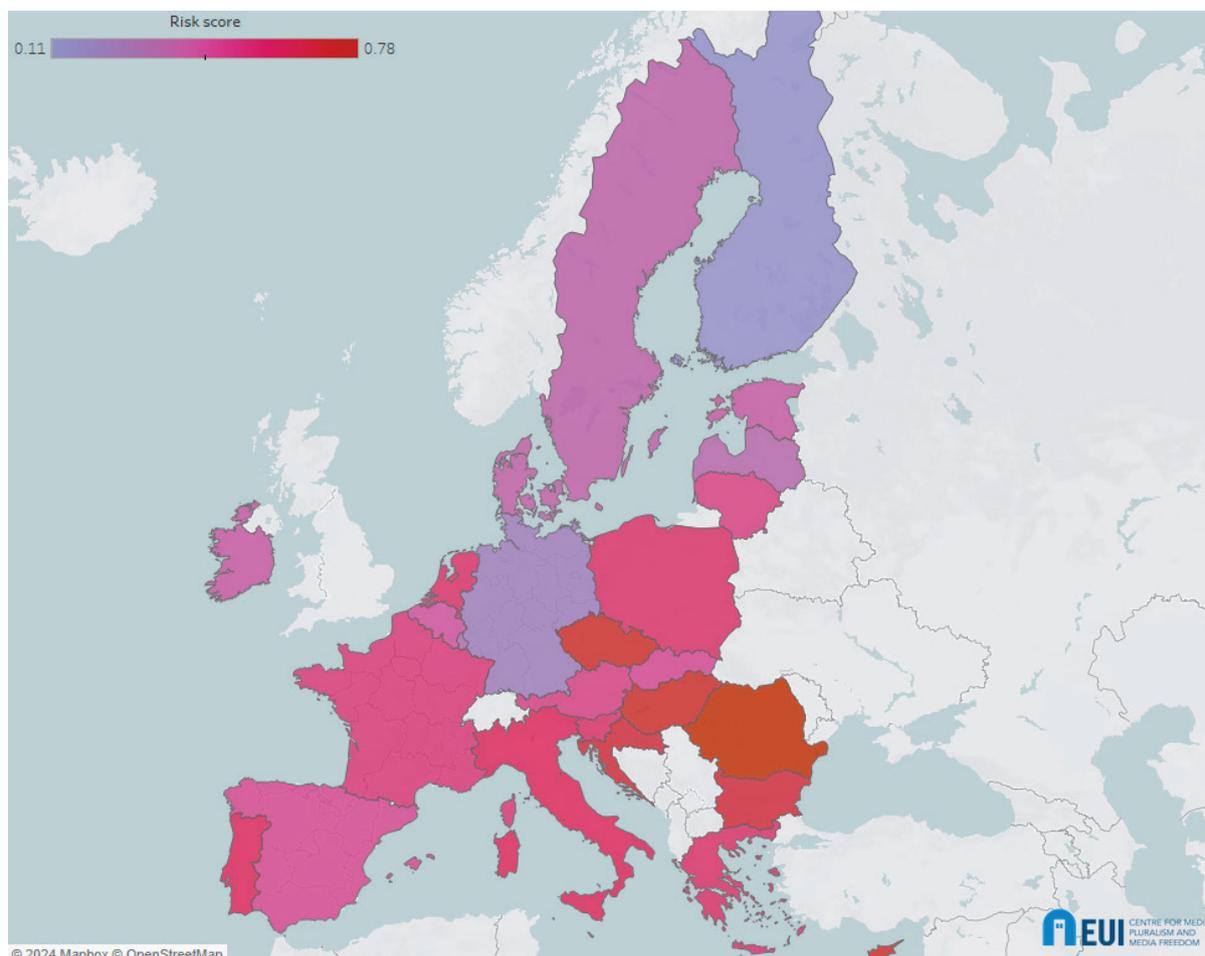
- Openly discuss and legislatively address the existence of municipal media, their status within the media landscape, and their competition with private media in the area of advertising.
- Set up specific research aimed at assessing the situation of local media vis-à-vis different sources of influence.

Social inclusiveness

The social inclusiveness indicator contains seven variables assessing the risks that are connected to minority and marginalised groups' access to information on the local level, whether local and community media provide critical information needs (CINs), and if they are engaged with their audience and how.

It has been assessed to **score the highest risk in Croatia, Cyprus, Czech Republic, Hungary, and Romania**, while the lowest risks were assessed in Finland and Germany.

Figure 5: Risk for the indicator “Social inclusiveness” in the 27 EU Member States



Looking into more detail, this research investigates the situation in public service media (PSM) and private media outlets. It asks if the PSM and private media outlets offer programmes in minority languages and what kind of representation of minority groups is demonstrated in news reporting (variables 46 to 49). The situation is more positively assessed in cases of PSMs than in private media.

The results are that the **PSM provision of news service in minority languages (variable 46) is assessed as very high risk in Malta**, which does not have legally recognised minorities and where the only other language present is English⁸⁰ and **Greece** where there is a lack of programmes for both legally recognised and unrecognised minorities.⁸¹ The representation of minorities on PSM (variable 47) has been assessed as biased and misleading in the highest scoring country for this variable, Hungary (very high risk), where “minority actors accounted for 2.5% of the news programmes.”⁸² In Croatia (high risk), for example “[t]he amount of PSM broadcasting in minority languages is not enough to achieve interculturalism.”⁸³

80 L. Vassallo, “Malta” chapter.

81 L. Papadopoulou and I. Angelou, “Greece” chapter.

82 G. Polyák and A. Urbán, “Hungary” chapter.

83 D. Vozab and A. Čuvalo, “Croatia” chapter.

On the other side of the spectrum, PSMs provide programmes in minority languages on satisfactory levels in Nordic countries with strong PSM regulation in this area (Finland and Sweden, very low risk). In addition, despite a noticeable offer of news in minority languages in six EU countries with low risk (Denmark, Germany, Ireland, Latvia, Slovakia, and Portugal), in some of them the PSM representation of these minorities is not positive, such as, in the case of Portuguese PSM which often offers programmes with negative stereotyping of minorities, while in Ireland there are sporadic cases of negative stereotyping and in Latvia the reporting is not sufficient (both of these countries score medium risk related to minority representation).

The situation is a bit different when it comes to the offer of minority media programmes, this time in private media outlets, and the representation of minority groups in them (variables 48 and 49). This is to an extent expected, considering that usually those media do not have legal obligations to report in minority languages, as in the case of PSMs. These variables score on EU aggregate level several percentage points higher risk than their PSM equivalents.

High risk has been assessed in 11 countries (Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Germany, Hungary, Malta, Romania, and Slovenia). One particularly interesting situation is observed in Croatia, where there are no private commercial media outlets offering minority media programmes but there are minority media, which are either founded by Committees for National Minorities,⁸⁴ financed by state funds, or they are founded by non-profit organisations.⁸⁵ On the other hand, in Finland, with the lowest risk score (very low), the situation for “media on the Swedish speaking Åland islands, with only 30,000 inhabitants, is exceptional with two daily newspapers, a public service radio and a commercial radio station.”⁸⁶ There are other cases of private media outlets providing frequent news programmes in minority languages (low risk), such as in Ireland (Polish, Russian, Lithuanian), Latvia (Russian, Latgalian) and Estonia (Russian). Another interesting situation can be found in Luxembourg, with low risk, where there is a “very paradoxical situation in which the sum of the linguistic minority groups will soon become the “majority.”⁸⁷

With regards to the existence of prominent⁸⁸ media covering marginalised groups (variable 50), the situation has been assessed to constitute a risk in most of the countries under this study (from medium to very high), thus, this variable on the EU aggregate level is considered to be the most concerning within the social inclusiveness indicator. Most of the country teams reported difficulties in retrieving specific data on this type of media and concluded that in most of the cases these media outlets exist in small numbers and are sharing the same problems with other local and community media. In some cases, due to their small and niche audience, this burden is even heavier. Only in Germany, Luxembourg, Sweden and the Netherlands the situation was considered satisfactory.

In many countries, the PSM does to a certain extent provide content addressing marginalised communities. In other cases, community media are fulfilling this role. Some examples of media covering marginalised groups can be found in:

Denmark: TV Glad,⁸⁹ which is focused on programmes for people with physical, psychological and social disabilities.⁹⁰ The Danish Broadcasting Cooperation,⁹¹ which is legally obliged to and adequately provides local and regional coverage, has been producing good quality programmes targeting youth.

84 Romi.hr, Landing page, <https://romi.hr/> or Portalnovosti.com, Landing page, <https://www.portalnovosti.com/impressum>.

85 Edit.hr, Landing page, <https://edit.hr/governance/>.

86 C. G. Lindén and M. Grönlund, “Finland” chapter.

87 S. Lukasik, “Luxembourg” chapter.

88 By prominent we mean publications/broadcasters that have a wider reach and solid reputation.

89 TV Glad, Landing page, <https://www.tv-glad.dk/om/>.

90 S. Simonsen, “Denmark” chapter.

91 Danish Broadcasting Cooperation, Landing page, <https://www.dr.dk/om-dr/nyheder/dr-samler-alt-indhold-til-unge-under-et>.

Spain: OMC Radio,⁹² “based in Madrid’s low income neighbourhood of Villaverde, is producing programmes for marginalised communities, such as people with mental health issues.”⁹³

Ireland: Women on Air⁹⁴ aims to improve the prominence of women experts and support women by providing media training.⁹⁵

The main problems burdening this type of media reported by many local researchers are their limited impact, reach, and sustainability. In the case of Lithuania, “the media support system, including the new model of media support, the Media Support Fund (*Medijų rėmimo fondas*), does not identify marginalised people as an audience group with specific needs.”⁹⁶ Several countries reported not having a prominent media outlet catering for marginalised groups (for example, in the cases of Cyprus, Greece, Hungary and Romania). In some cases, such as in Italy, it argued that “these topics are often superficially explored, presented in sensationalist or paternalistic tones, and accompanied by polarised debates.”⁹⁷

Finally, the researchers examined whether the local media provide enough public interest information so that the audience can make more informed decisions: in other words, if these media meet critical information needs (CINs) (variable 51). A positive assessment has been noted in Austria, Belgium, Finland, Germany, Greece, Latvia and Luxembourg. In some cases the inadequate level of provision of public interest news was linked with political interference (e.g. in Bulgaria, Czech Republic, Lithuania and Slovakia), in other cases it is considered to be the result of financial difficulties (e.g. in the Netherlands). In terms of news content, the researchers note that there is little diversity in local topics (e.g. in Croatia); soft news and sensationalist reporting dominate (e.g. in Denmark). In France, the researcher notes that “there is virtually no information in the public arena that can be used to find out about local issues, analyse public policies or simply look at the issues that affect people’s daily lives.”⁹⁸

In terms of engagement of local and community media with their audience (variable 52) researchers investigated not only the level of “trust” towards these outlets but also their connection with the community, because local and community media may contribute to enhancing the levels of cohesion and solidarity within it. This variable has the lowest EU aggregate risk score within this indicator.

Solid connection with the community is reported in Austria, Belgium, Denmark, Finland, Germany, Greece, Hungary, Ireland, Latvia, Lithuania, Luxembourg, Malta, and Spain. Local media are considered to enjoy higher levels of trust in Croatia, Finland, and Greece. These media outlets support their communities in various ways; in Latvia, for example, they provide support for local cultural events or organise debates on socially or politically relevant topics. Moreover, as these outlets often do not have resources for carrying out audience research, this is a way to get more direct feedback from the audience.⁹⁹ Another interesting example is that of Austria, where community media are covering marginalised communities. “[T]he relatively low reach is not the most relevant value when it comes to community media, but the multiplier effect created by the activities in and for a region.”¹⁰⁰ Still, one peculiar situation is that of Hungary, where the engagement of local media with their audiences is assessed to be on a satisfactory level, but the overall risk in the social inclusiveness indicator is high. The question remains whether this engagement actually balances the risks related to media capture and scarcity of public interest news.

92 OMC Radio, Landing page, <https://www.omcradio.org/>.

93 E. Y. Piquer, “Spain” chapter.

94 Women on Air, Landing page, <https://womenonair.ie/>.

95 E. Culloty, “Ireland” chapter.

96 A. Balčytienė and D. Jastramskis, “Lithuanian” chapter.

97 A. Mangani, “Italy” chapter.

98 F. Bousquet, “France” chapter.

99 A. Rožukalne and J. Juzefovičs, “Latvia” chapter.

100 M. Beaufort and A. Schulz-Tomancok, “Austria” chapter.

On the other hand, the detachment between local media and their audience has been noted in Bulgaria, Czech Republic, and Portugal, as well as to an extent in Cyprus, where media do not have a clear picture of the audience and their needs, and are not in close contact with them. Moreover, in Sweden, “there is also a risk for local media outlets to lose [the] connection [with their audience] because of lack of financial, human resources, moving to centralised content production as well as desk-bound news production.”¹⁰¹

Recommendations

To the EU, Member States and local public authorities:

- Orient policymaking and legislative processes focusing on the role of local and community media for integration in multicultural societies.
- Support the existence of media that are covering minority and marginalised groups, providing additional financial resources for these types of media. When providing such resources, clear and transparent criteria at arms’ length should be used in their allocation.
- Provide a clear definition of community media, and to subsequently ensure regular support for them.

To journalistic organisations, journalists and newsrooms:

- Support cooperation and networks of local and community media to share resources, knowledge and best practices as well as to strengthen their advocacy power.
- Journalistic organisations and CSOs should also pay particular attention to media covering minority or marginalised groups, follow their work and provide them with capacity building or any other support to assist them in their sustainability efforts.

To representatives of academia:

- In some countries there is a lack of research and data related to the media coverage of marginalised groups, or to the possibilities of accessing relevant information for these groups. They represent an important and very relevant part of society and this type of research should be supported in order to improve diversity, pluralism and inclusiveness.

To other stakeholders:

- Community media in many countries have not been investigated in more detail. In order to achieve proper evaluation of the sector (if it exists), it is important to collect comprehensive data through detailed analysis that would ideally include more than one indicator covered by LM4D research. This could be done in coordination with different actors, including public (EU and national) institutions, academia, CSOs and journalistic organisations.
- It has been noted that in many countries there is a lack of data on the levels of trust and engagement between local and community media and their audience. This type of research should be strongly encouraged and supported. It could be supported by public (EU and national) institutions and implemented by academia, journalistic organisations and CSOs.

Best practices and open public sphere

For the scope of this study, “best practices” are those innovative practices that enhance an open and thriving public sphere in specific communities. In particular, LM4D has investigated (1) whether news media organisations are experimenting with innovative responses to improve reach and audience, proposing new forms of work, journalistic products or services (variable 53), and (2) whether there are citizen or civil society initiatives providing innovative responses to tackle the problem posed by the decline of local and community news provision (variable 54).

101 E. Stur and A. Cepaite Nilsson, “Sweden” chapter.

The answers were heterogeneous in terms of experiences reported by the local researchers who cited relatively few examples of best practices, and, therefore, the final sample to analyse was already rather limited in the first place. Indeed, except for *Project Oasis*¹⁰², which is a research project on the sustainability and innovation of independent digital native news organisations that offers a directory of 561 European media organisations, to our knowledge, there are no comprehensive and up-to-date libraries on innovative news media in Europe. Secondly, and as previously highlighted, there is in general a lack of data to understand innovative practices in the media. In many cases, there is no data whatsoever to corroborate the success of certain practices. In other cases, data is not aggregated, only available on request, not updated regularly, or posted in formats that are not machine readable. Furthermore, in many cases, the success of innovative practices may be short-lived, and therefore more time and more data would be required to fully assess them. Finally, innovation can be identified in all the news life cycle, so there are several areas where it can be identified: from news formats and dissemination to business models. Researchers have thus given prominence to different aspects of media and journalistic innovation, which did not favour comparability and an in-depth analysis of specific innovative practices. Despite these limitations, the LM4D research collected a list of experimental and successful initiatives and was able to identify general trends.

In terms of news format, one of the most popular best practices we came across is the deployment of email newsletters. These have recently (and once again) become popular as a means of disseminating curated news both by legacy print and newer digital media. Such a “renaissance of newsletters” is occurring for various reasons but mainly to avoid being locked into the ecosystems of social media as well as to regain a gatekeeping power. Email newsletters offer a high degree of targeting, curated content, distraction-free analysis and commentaries. However, their structures and content can vary significantly, reflecting different editorial visions, objectives or business models. Notable examples of news organisations deploying newsletter in original ways include *Viernull* (Germany), *InsideStory* (Greece), and *Nyomtassteis* (Hungary). CMPF researchers interviewed editors and journalists and narrated their practices.¹⁰³ Eventually, online newsletters have proved to be a powerful strategy to engage audiences, regain their trust and encourage new subscriptions. The success of these formats also shows that there is room to compete with mainstream social media by leveraging their common limitations, such as a lack of control over personalisation, attention-grabbing strategies, and questionable privacy protections.

Another thriving practice in terms of news formats encountered during our research is the offer of local and community news via podcasts. These are generally defined as episodic series of audio files that can be downloaded, subscribed or simply listened. Unlike other journalism formats using the transmission of voice, such as radio, podcasts are considered a more active process where listeners demonstrate a greater degree of engagement. This allows for episodes to be developed in a more demanding way, using immersive and narrative storytelling techniques that can be consumed at a comfortable pace, as a form of “slow media”, which creates a personal connection between the hosts and listeners. At the same time, however, they can also create a “sense of collectivity” by allowing recommendations and sharing among users. These features may explain why this format has become widespread in Europe with its usage ranging from 27% in Belgium to 45% in Spain¹⁰⁴. Podcasts are particularly attractive to audiences which are seeking a more deliberate, mindful, and meaningful media experience. Indeed, several local news media experiment with them. Podcasts are a powerful tool for engaging audiences, particularly younger ones. Publishers’ willingness is indeed to invest more in podcasts and newsletters, as these two formats have proved to be successful in increasing loyalty and in attracting new subscribers¹⁰⁵.

102 <https://projectoasis europe.com/>

103 See U. Reviglio and D. Borges, ‘Newsletters, podcasts and slow media: successful news media strategies to engage audiences in the attention economy’, July, 11, 2023: <https://cmpf.eui.eu/newsletters-podcasts-and-slow-media/>

104 Newman, N., Fletcher, R., Eddy, K., Robertson, C. T., and Nielsen, R. K. *Digital News Report 2023*, 2023.

105 Newman, N., *Journalism, Media, and Technology Trends and Predictions. Digital News Project*, Reuters Institute for the Study of Journalism, January 2022.

In terms of sustainability, an important best practice for local media is the involvement in public interest activities that eventually have a social impact.¹⁰⁶ This commitment is particularly strong and rewarding for local media due to their proximity to the issues and communities they cover¹⁰⁷. There are certainly manifold ways in which news organisations and civil society can make a societal impact by advancing a well-informed and participatory citizenry. Traditionally, local news media have played this public interest role, for instance, by informing, representing, and investigating at the local level. However, with the advance of new forms of communication and possibilities for reaching audiences, on one hand, and the different needs of audiences and societies, on the other, these traditional public interest roles have expanded to include also listening to or even empathising with audiences.¹⁰⁸ Particularly meaningful local media initiatives for social inclusion that emerged in our research are the so-called “street newspapers”. These are magazines or newspapers sold by people experiencing social forms of marginalisation, such as poverty or homelessness, and are usually produced by independent non-profit media entities that have the mission of tackling poverty and reporting on social justice issues. These initiatives, in some cases, can enjoy the support of the whole community in times of crisis, eventually making them more resilient and sustainable.

Transnational networking and cooperation can also be considered a best practice. Street newspapers, for example, can affiliate with the *International Network of Street Newspapers*, which gathers 92 street papers in 35 countries, supports street papers to start up, develop and scale through regional networks, events and other peer-to-peer learning opportunities. Another example of transnational cooperation is offered by the case of *Indip*, a self-funded local outlet in the Italian region of Sardinia which has recently developed *InLeaks*, a whistleblowing reporting platform based on *GlobaLeaks*, part of the wider *Whistleblowing International Network*. Thanks to the collaboration with this organisation which freely offers their tools and expertise, *Indip* can guarantee the privacy and safety of sources at no cost.

In addition to investigating innovative formats, public interest missions and forms of cooperation, the answers to the LM4D questionnaire also revealed some particulars of the business model of local media outlets. In this regard, some digital native local media outlets use the subscriptions’ model as their main source of funding. This is the case of *InsideStory* and *Viernull*. The latter indeed was initially funded through a crowdfunding campaign, moving then to a subscriptions model.¹⁰⁹ The subscriptions model is also used by podcasts, since as newsletters, this format has proved to be successful in increasing loyalty and in attracting new subscribers.¹¹⁰ Another source of funding currently used by local media are grant opportunities offered by national governments, the European Commission or other institutions, such as the Open Society Foundations. This is the case of the Journalism Incentive Fund in the Netherlands which financed, for instance, *Spot On Stories*, a collective of independent freelance investigative journalists that produces research stories in the province of North Brabant and presents them in an understandable and innovative way.¹¹¹

Finally, the LM4D research has also recognised the ambiguous role of social media and online news consumption in local media desertification. While leveraging online channels to reach audiences is generally a successful practice for local news media, it might also have undesirable consequences. For example, excessively relying on social media’s automated curation can create dependency and uncertainty.¹¹² As previously mentioned, this can also explain the success of newsletters. Indeed, the investigation of LM4D shows that many innovative practices are those that ultimately aim to offer local news in a distinctively different way from the logics that online platforms have imposed upon them, in particular the attention-grab-

106 Borges, D., and Reviglio, U., Networking for public-interest: unveiling local media strategies for social change, December 21, 2023, posted on: <https://cmpf.eui.eu/networking-for-public-interest-unveiling-local-media-strategies-for-social-change/>

107 Blagojev, T., Da Costa Leite Borges, D., Brogi, E., Kermer, J. E., Trevisan, M., and Verza, S. News deserts in Europe: assessing risks for local and community media in the 27 EU member states. *European University Institute*, 2023.

108 N. Pignard-Cheyne, and L. Amigo, “(Re)connecting with audiences. An overview of audience-inclusion initiatives in European French-speaking local news media”, *Journalism*, 24(12), 2023.

109 Project Oasis, A research project on the trends, impact and sustainability of independent digital native media in more than 40 countries in Europe’ (Research Report, 18 April 2023) Available at <https://projectoasis.europa.com/wp-content/uploads/2023/04/Project-Oasis-PDF-April-17-2023.pdf>

110 Newman (n 4).

111 See <https://www.svdj.nl/project/spot-on-stories-2022/> Accessed 14 February 2024.

112 Reviglio, U., The ambivalent and ambiguous role of social media in news desertification, September 1, 2023, posted on: <https://cmpf.eui.eu/the-ambivalent-and-ambiguous-role-of-social-media-in-news-desertification/>

bing news strategies. Many of the best practices we have observed are thus mainly focused on improving news quality and regaining reader's attention and trust. This means, above all, offering news in different formats—formats that are “slower”, more in-depth—and a news production that is eventually more community-focused and network-oriented.

Recommendations

To the States and to the public authorities:

- Efforts should be made to improve the collection, aggregation, and sharing of data related to innovative practices in the media industry. Policymakers can facilitate this by promoting standardised data collection methods, encouraging transparency in data sharing, and supporting initiatives that aim to create comprehensive libraries or directories of innovative news media organisations. Systematically and regularly monitoring innovative practices for local and community media outlets can help to identify and, eventually, support sustainable best practices.
- Provide support for innovations in local and regional media (technological development, new business models), in particular for news media organisations and civil society initiatives that are experimenting with innovative responses to improve reach and audience engagement. This support can help foster the development and implementation of new forms of work, journalistic products, and services.
- Encourage the diversification of news formats by highlighting their effectiveness in engaging audiences and regaining their trust. This can involve providing training, resources, or incentives for news organisations to explore and invest in these formats.
- At a more systemic level, consider policy measures to counteract the externalities of the attention-capturing ad-based online business model for local media. Generally, policymakers could find ways to incentivise news outlets that employ alternative business models and disincentivise those who exploit “click-baiting strategies” that threaten news quality.

To journalistic organisations, journalists and newsrooms:

- Prioritise investment in innovative practices and technologies that enhance long-term audience engagement, trust, and adaptability to changing audience preferences and behaviours.
- Foster collaboration and networking within the industry, and share best practices, lessons learned, and resources with other journalistic organisations to collectively drive innovation and improve the quality of local journalism.
- Embrace a mindset of innovation and experimentation in journalistic work by exploring new storytelling techniques, formats, generated artificial intelligence and platforms. Be open to learning new skills and technologies that can enhance journalistic reporting and audience engagement. Also, seek and integrate audience feedback and maintain ethical standards and integrity when experimenting with new formats.
- Recognise the ambiguous role of social media and online news consumption in local media desertification. Make sure that online activities maintain high standards of quality and transparency, possibly by uncovering and sharing insightful data analytics.

To representatives of academia:

- Develop models to specifically measure the various facets of local media innovation at the local level, taking into account all the news cycle and all the changes induced by the digital transition. This can help generate valuable insights and data to inform policy and industry practices.
- Develop interdisciplinary training programs that equip future journalists and media professionals with the skills and knowledge necessary to innovate in the rapidly evolving media landscape.
- Foster collaboration between academia and industry. This collaboration can help bridge the gap between theory and practice, leading to more impactful innovations in journalism.



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