

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN MEMBER STATES AND CANDIDATE COUNTRIES IN 2023

Country report: Cyprus

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Research Project Report

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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool that is designed to identify potential risks to media pluralism in the Member States of the European Union and in Candidate Countries. This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2023. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This year a part of the MPM has also been piloted in Bosnia and Herzegovina and Moldova. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological notes

• Authorship and Review

The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports. The research is based on a standardised questionnaire that was developed by the CMPF.

In Cyprus the CMPF partnered with Christophoros Christophorou (Independent expert), Nicholas Karides (Institute for Mass Media, IMME), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert. Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

• The Digital Dimension

The Monitor does not consider the digital dimension to be an isolated area but, rather, as being intertwined with the traditional media and the existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digitally specific risk scores, and the report contains a specific analysis of the risks that related to the digital news environment.

• The Calculation of Risk

The results for each thematic area and Indicator are presented on a scale from 0 to 100%.

- Scores between 0% and 33%: low risk
- Scores between 34% and 66%: medium risk

- Scores between 67% and 100%: high risk

With regard to the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

• Methodological Changes

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2024 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2024, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

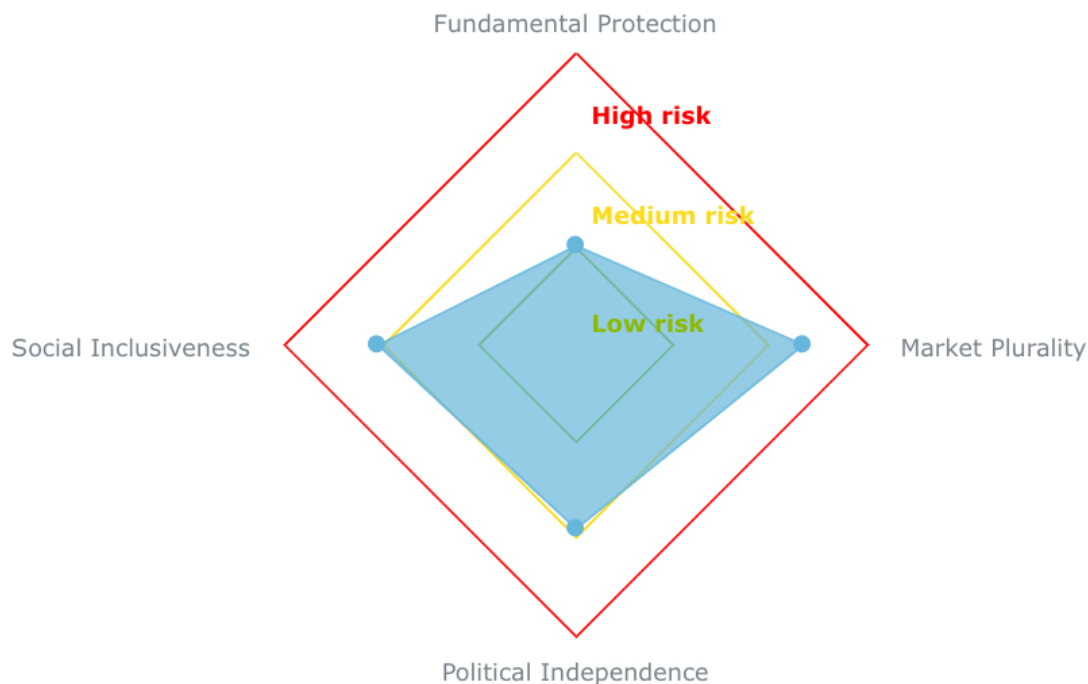
- **Population:** Cyprus has an area of 9,240 km² with a de jure population of 923,272 (census 2021) ^[1].
- **Languages:** The official languages are Greek and Turkish.
- **Minorities:** The 1960 Constitution of the Republic of Cyprus recognises two power-sharing communities, the Greek and the Turkish communities. These live segregated since the collapse of the bi-communal arrangement in 1964 and the 1974 Turkish invasion that has since de facto divided the island. The Republic of Cyprus is a member of the EU with the *acquis communautaire* suspended in the part of the island which is not under the effective control of the government of the Republic. Many rounds of negotiations under the auspices of the United Nations aiming to end the division have so far proved unproductive. Armenians, Maronites and Latins are recognised as religious groups. They were given the option in 1960 to 'join' either one of the two communities, and they chose the Greek community. They constitute around 1.3% of the Greek Cypriot community. The total number of foreign nationals, according to the 2021 census, amounted to 193,300 and corresponded to 21.1% of the total population. EU and non-EU citizens represented 10.9% and 11.04% of the employed labour, respectively, in 2021.
- **Economic situation:** A decade after the collapse of the Cypriot economy and its exit from the EC-ECB-IMF program, the Cypriot economy, post Covid, has been recording growth rates of 5.7% in 2021, 5.8% in 2022 and a slower 2.4% in 2023 ^[2]. The war in Ukraine continued to affect local energy prices and private consumption but the unemployment rate in the last quarter of 2023 stood at 5.9% of the labour force improving slightly compared to 6.9% in the corresponding quarter of 2022. ^[3]
- **Political situation:** The socio-political landscape is in transition in the past decade with a weakening of the traditionally strong trade unions and of the left-right polarisation in politics. Party and ideology attachment is succeeded by very low trust in political parties and politicians. Citizens' alienation is expressed by high abstention rates and a fragmentation of political forces with the appearance of many small formations. Far right is gaining ground. The corruption index is very high, while cases of involvement of state officials that have emerged in recent years have strengthened the firm conviction of the public about the unwillingness to tackle it. Seven parties entered in May 2021 the 56-seat House of Representatives, after meeting the threshold (3.6%). The abstention rate was 34.3%, while in the February 2023 presidential elections was 28%, with tens of thousands avoiding to enrol as voters. Higher abstention rates are recorded in the local government and the European elections (55% in 2019). In February 2023, Nicos Christodoulides, former minister in the government of Nicos Anastasiades was elected President of the Republic. This was the first time a candidate came to power without the support of one of the two major political parties, of the left and the right. Under the Cyprus presidential system, executive power lies with the President and his Council of Ministers.
- **Media market:** The shift towards online media, appeared to have stabilised in 2022 and continued in 2023. Data and information coming from survey's and TV ratings and compiled by Gnova Communications in MediaGnosis report show that for the October-December 2023 period ^[4], readability for newspapers was at 5.8% in weekdays, receding by 1.3 percentage points from 2022; it was 7% in Saturdays (against 11.3%) and 5.9% in Sundays (against 9.8%). The decline since 2020 is spectacular, with newspapers losing almost two out of three of their readers. Legacy newspapers have retained strong portals and online editions, in competition with several digital native content news organisations,

but complete, audited data are not available. In radio, the PSM Trito is on top with 15.4% (16.4%) followed by Kanali 6 at 12.8% (11.8%) and radio Proto at 10.3% (9.7%). In television, Alpha is leading with 15.3% (15.8%), followed by ANT1 at 11.6% (11.4%) and Omega at 11.0% (10.9%). Night news bulletins of Alpha are also on top with 14.9% (15.2%), followed by Omega 14.6% (12.6%), ANT1 13.3% (13.5%) and RIK (PSM) at 12.0% (12.8%) in 4th place against 3rd in 2022. The internet service provider (ISP) market in Cyprus is dominated by only four players that cover 100 per cent of the market. Data by the Office of the Commissioner for Electronic Communications and Postal Regulation for the first half of 2023 showed that CYTA holds the biggest market share in broadband access with 58.0% (57.6%), followed by Cablenet stable at 23.4%, Primetel with 11.6 (12%) and the fourth EPIC with 7.9% (6.9%)^[5]. Overall **media viability** remains precarious, although television appeared to have steady income since mif-2022 and radio having an increase in income of above 10%.

- **Regulatory environment:** The media regulatory framework for both the commercial media and the PSM, was updated in December 2021 with the transposition of the 2018/1808 AVMS EU Directive into Cyprus Law. In July 2023, through an amendment of the law^[6], the House of Representatives abrogated almost all barriers and ceiling in shareholding and control of a radio and television organisation. There is still no regulatory framework for the digital media domain, while the Press Law L. 145/1989 has since 1989 not been updated and large parts of it remain inoperative.

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

Cyprus: Media Pluralism Risk Areas



JS chart by amCharts



Two major developments have affected the state of media pluralism in Cyprus, which for many years had shown little or no improvement; a change in government has modified the relations between the executive and the media, while an amendment of the law on Radio and Television Organisations^[7] has lifted almost all barriers to horizontal and vertical media ownership and control. The impact of the change in power and of the law amendment on media pluralism has affected the risk level of domains evaluated in the present report. All four areas show a marginal risk deterioration. **Fundamental Protection**, which has over the years consistently been a good performer for Cyprus has slightly deteriorated to 34%, crossing the line into medium risk. The area of **Market Plurality** has shown an increase of the risk level from 73% to 78%, the situation for **Political Independence** has very slightly deteriorated from 61% to 63%, and **Social Inclusiveness** similarly passed from a risk rate of 64% to 68% crossing the line into high risk. Overall, one area is in the low risk zone, one in the upper medium and two within the high risk.

In addition to specific issues relating to individual sectors, the key problems that permeate and affect almost all areas are the absence of a law on digital media, to regulate the now dominant online environment. A second factor is that an antiquated press law is largely inoperative and a draft law prepared by the authorities is failing to meet established standards. Even the only existing complete regulatory framework on radio and television, is in need of an update and improvement. Instead of this, this law was amended and critical for pluralism provisions were abrogated, resulting in an increase of the existing serious risks to pluralism.^[8] The risk evaluation in the present report is often negatively affected by the lack of information and audited market and audience data and the absence of transparency (no reports published) in respect of policies by the government, and other actors.

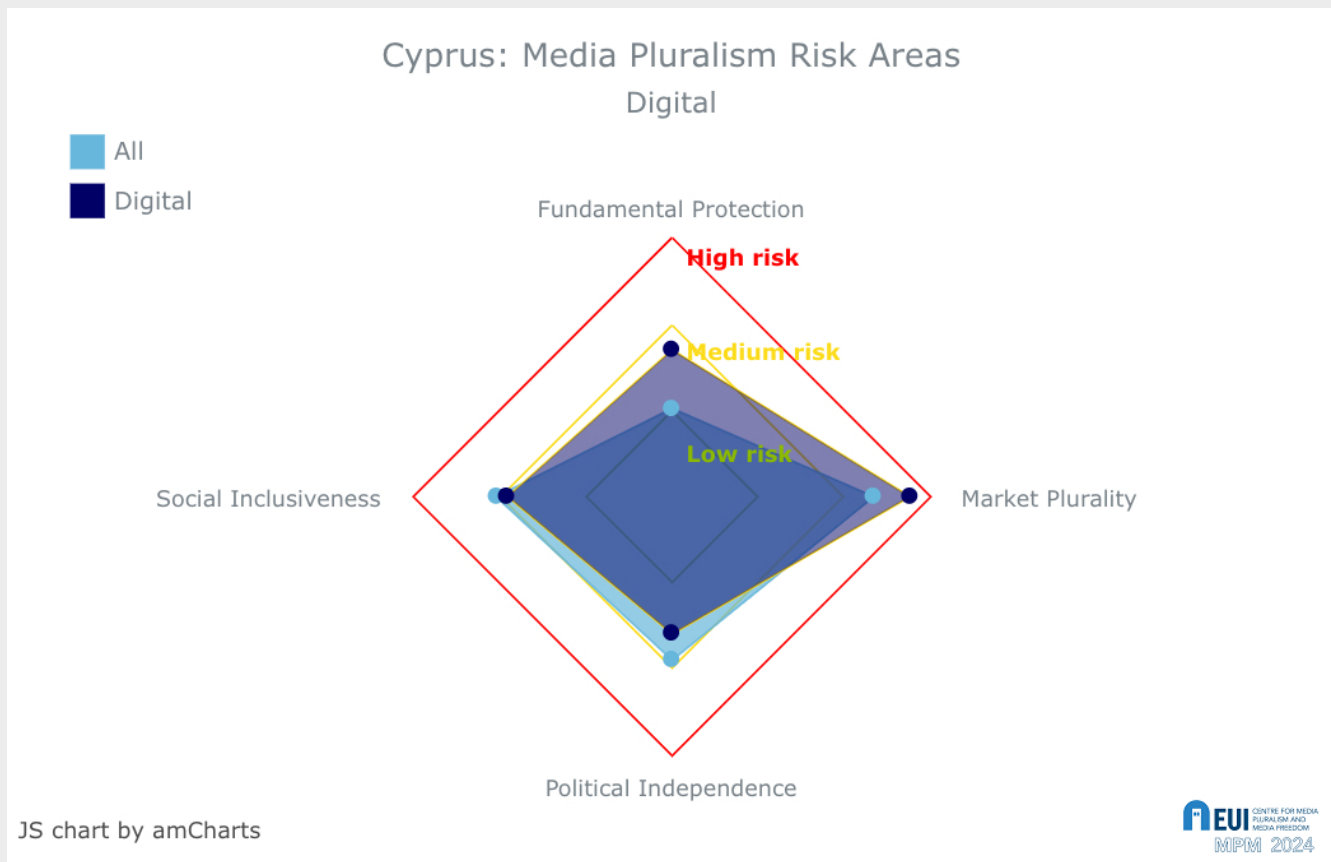
The risk level in the area of **Fundamental Protection** of freedom of expression has slipped by one point in 2023 over the previous year, entering into the medium risk zone. This is due to the slight increase in three of the five indicators in this area, while, it has improved for the indicator **Protection of the right to information** and remained unchanged at low risk for the **Independence and effectiveness of the Media Authority**. The promulgation of the laws on FOI^[9] and on the protection of whistleblowers^[10] and some subsequent activities to raise awareness have not been accompanied by concrete actions of enforcement. Access to information still faces obstacles, while persons involved in critical cases by providing /disclosing information have been under threat instead of being protected. In the case of **Journalistic profession, standards and protection**, the raise of the risk level is linked to the need for the authorities to promote legal measures that are effective in the protection of journalists from surveillance and other threats. The delay in following the rapid technological advances and meeting the requirements for higher speeds has negatively affected the risk for the **Universal reach of traditional media and access to the Internet**.

The area of **Market Plurality**, which is the worst performing sector in the broader context of media pluralism, has presented an even worse picture, within the high risk zone. This has been mainly due to the impact of the abolishment of all restrictions on media control and ownership with the amendment of the law on Radio and Television Organisations L. 7(I)/1998^[11] in July 2023. The amendment has impacted on **Transparency of media ownership**, which is cancelling transparency's role as a tool to constrain concentration. In principle, authorities use it in order to enforce thresholds and avoid oligopolies. This cannot work anymore since the removal of thresholds allows 100% shareholding and unimpeded media control. Risks facing **Plurality in digital markets** and **Editorial independence from commercial and owner influence** have also risen higher over 80%, while **Plurality of media providers** remains at high risk too. In addition to influences by media owners and business interests in editorial content, the phenomenon of journalists being active in the broader communication market is negatively affecting information integrity. **Media viability** has shown a slight improvement, which is connected to the good performance in radio income and stable income for television. While, numerically, changes appear small, when this happens while an indicator is already in the high risk zone, the impact has much more weight than numbers show.

The area of **Political Independence** shows for a second consecutive year a slight overall increase of the risk level. The impact on the indicator **Political independence of the media** from lifting almost every barrier to media control and ownership is critical in respect of political influence on the media; the possibility for politicians and even power holders to own media is a threat for pluralism and democracy. The indicator **State regulation of resources and support to the media sector** has shown a slight improvement of the risk although the competent State authorities have failed to provide all information requested about spending to the media. Three indicators, **Editorial autonomy and audiovisual media**, **Online platforms and elections** and **Independence of public service media** have remained at exactly the same risk level as in 2022, with the latter still within the high risk bracket.

In recent years the risk to **Social Inclusiveness** in Cyprus has hovered between the top threshold of medium risk and the lower threshold of high risk showing little movement; in fact, this is deteriorating further this year, entering the high risk range again. In individual domains, the risk for the indicators **Representation of minorities in the media**, **Gender equality in the media** and **Protection against disinformation and hate speech** have all increased and are at the high risk bracket. The gender factor is negatively influenced by, among other issues, the absence of a gender policy by the PSM and the presence of only one female member in its 9-member governing body^[12]. For **Local /regional and community media** and **Media literacy** the risk has remained stable, the first within the band of low risk and the second at medium level, almost identical as last year.

Focus on the digital environment



Fundamental Protection (57%)

There has been no action for introducing a regulatory framework for online communication, which gains more and more space in the media environment. The existing rules for traditional communication and legacy media apply at present, but they are largely insufficient to adequately regulate digital and the overall media environment.

Market Plurality (92%)

The absence of any regulatory framework for digital media means that they have no legal obligation to disclose ownership or other details (except under the Company law). The removal of media control barriers in the radio and television law point to the risk of vertical ownership concentration, including native digital media. This possibility is added to the already existing risk of horizontal ownership concentration in the digital sector, since no thresholds on capital share or other constraints are established. In addition, the exact picture (market and audience figures) of the digital environment is in a grey zone and the risk is very high.

Political Independence (53%)

Given the opacity in the sector, there is no concrete information about political links or influence on digital media. In any case, the absence of any ownership constraints for anyone, including politicians,

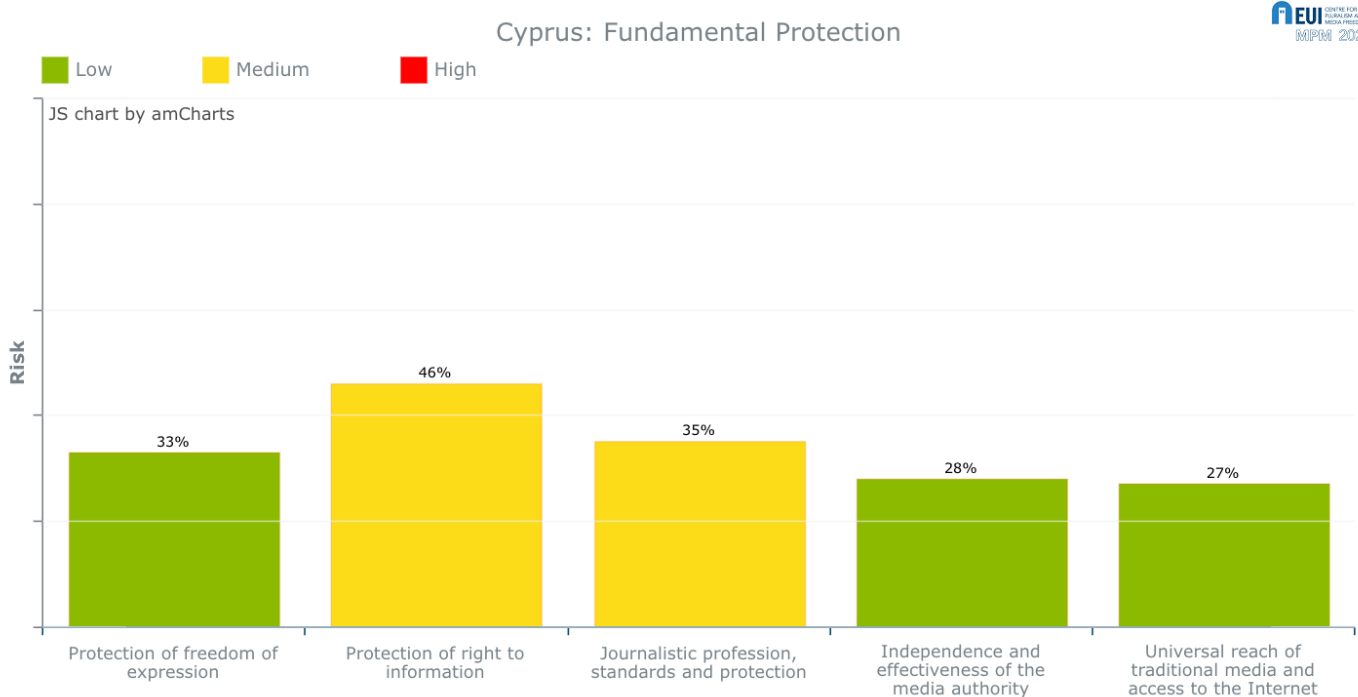
through the amendment of the Law on Radio and Television Organisations L. 7(I)/1998, means that political control is possible, pointing to high risk, when it comes to the digital dimension in the indicator Political independence of the media.

Social Inclusiveness (64%)

No regulatory framework or specific plans exist for countering disinformation and hate speech online. However, there are a couple of private initiatives, with limited resources and potential.

3.1. Fundamental Protection (34% - medium risk)

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



The risk level in the area of **Fundamental Protection** of freedom of expression has very slightly worsened to 34% in 2023 from 33% in 2022. The risk in three of the five indicators in this area have showed a slight increase, while, the indicator **Protection of the right to information** has improved and returned almost to the same level as in 2021 (46% in 2023 against 69% in 2022). However, improvements expected from the promulgation of laws on FOI and the protection of whistleblowers, since these laws have enhanced the de jure situation, have not been sufficient enough; the rights protected under the new legislation have remained under threat in critical cases that have emerged. There is also a slight decline regarding the indicator **Journalistic profession, standards and protection**, because more legal measures are needed for the protection of journalists. The situation regarding the **Universal reach of traditional media and access to the Internet** showed a decline because of new, more demanding, criteria introduced regarding broadband coverage and access. Regarding the **Independence and effectiveness of the Media Authority**, the risk level has remained stable at low risk.

The indicator **Protection of freedom of expression** showed a slight risk increase but it remains at the limits of low to medium risk (with 33% against 29% in 2022). Cyprus is, since the early years of its independence (1960), a signatory member without any reservations of the international instruments for the protection of Human Rights, the ECHR and the ICCPR. Its Constitution and laws are in line with the universal standards set in the aforementioned treaties, and courts deliberate in compliance with the standards they set. Although the Republic is among the few countries that decriminalised defamation since 2003, there remain in the criminal code provisions regarding foreign officials and the protection of the memory of deceased persons. Still, no anti-SLAPP law has been promoted. The legal system is balanced in ways enabling persons to use legal remedies to claim respect of their dignity and other individual rights, but

also protecting the right to free expression. These are, however, gravely affected by an administration of justice system that is the slowest in Europe^[13].

The change in government in February 2023, has not led to decisive improvements regarding respect in practice of the right to Freedom of expression. There have been incidents of threats by the Attorney General for introducing new laws or taking legal action against journalists^[14] and others; the former President of the Republic threatened legal action against a journalist, once a former aide of his^[15]. Also, officials of the new government react with negative statements to criticism^[16], a reaction which is contrary to their obligation to proactively create an enabling environment for free expression. Incidents of censorship by the governing body of the PSM and by the Ministry of Education^[17] were observed in 2023, affecting the right to free expression.

The media regulatory framework is either inexistent, for native digital sector, or antiquated and partly inoperative, regarding the Press Law 145/1989^[18] and the Law on the PSM /the Cyprus Broadcasting Corporation Ch. 300A;^[19] the Law on Radio and Television Organisations L. 7(I)/1998 also needs an update in order to respond to today's environment and established standards. It seems that there are ongoing processes for the revision of laws on the PSM and the commercial radio and television organisations. However, work remains among public stakeholders, with no public consultation procedure, while no information is available if expert contribution was sought. A draft for a new Press Law that came to the attention of the authors of this report appears as being far from meeting established standards and ensuring respect for fundamental rights.

The risk level for the **Protection of the right to information** returned to medium risk at 46%, after a spectacular increase to 69% because of denial to access to information regarding State spending to the media and effective protection to whistleblowers. However, the present score and medium risk point to the fact that the positive note with the promulgation, of the Law on the Right to Access Information held by Public Authorities L. 184(I)/2017^[20], is not sufficient enough for full respect of the right to access to information. The examination of samples of the "publication plan", which is an obligation for public law bodies and the administration to draw, has shown that this limits critically the right to access and leaves room for arbitrariness. A close look into the law shows that its provisions give more emphasis on restrictions of access instead of being a guarantee of the protection of the right to information. The assessment of the law by the organisation AccessInfo finds that this is not satisfactory in respect of international standards^[21].

To a request by the authors of the present report for detailed data on State spending to the media, in late 2023, the Press and Information Office promised in early January 2024 information "relevant to its competencies". On 24 April 2024, PIO produced simply a list of "information campaigns", with no data on media advertising spendings, invoking an August 2023 decision of the Commissioner of Information.

The vote in early 2022 of the Law on the Protection of Persons that Report on Violations of the EU and National Law L.6(I)/2022, protecting whistleblowers, was followed in 2023 by the publication on the website of the ministry of Justice of Guidelines to employers and employees and the list of competent authorities for each category of issues^[22]. The authors of this report are not aware of any public campaign for informing and raising awareness on the subject. Although the adoption of the law and the publication of guidelines are positive steps, their contribution to effective protection is still in doubt. A most prominent case, that of a former aide of the former President, who published claims of corruption and made a complaint that his communication equipment had been hacked, still remains open. The Police has still not investigated the case, while members of the police, and recently (February 2024) the former President threatened with legal

action and claimed damages^[23]. The Authority against Corruption is investigating the case of corruption and has begun to gather testimonies. In another case, claims of corruption of a Director in the Public Service, with the Auditor General stating in public that there has been evidence pointing to suspicion of wrongdoing has not yet been cleared.^[24] The same day, the Interior minister stated in public "there is no case", while the person that made the claims was immediately sent to another town. The above cases show that more is needed so that the adoption of laws can also bring their effective implementation. In February 2024, following information in a daily that a State Commissioner was caught driving with alcohol indicator in blood above the limit, police called on a journalist asking for his sources of information.

The indicator **Journalistic profession, standards and protection**, has shown a slight risk increase, passing from low to medium level, from 32% to 35%. This means no significant changes have taken place. However, as noted in the 2022 report, in the absence of any recent survey, problems might be more serious and the risk might be even higher. The negative impact on media and journalism because of the general economic situation has further deteriorated with the conflict in Gaza and the broader region. The broader issue of surveillance, and revelations that Cyprus supported the article allowing the surveillance of journalists during discussions on the European Media Freedom Act^[25] raised concerns and has made the need for greater protection more urgent.

Although no formal or other obstacles hinder in any way access to the journalistic profession and strong labour laws do guarantee the status of all employed persons, uncertainty of employment remains high. It appears to have made the position of the Union of Journalists and of journalists themselves more precarious; according to testimonies received by the authors, journalists face the dilemma of whether to fight to safeguard editorial independence or try to safeguard their labour rights or even accept cuts on benefits. While not abandoning the former, efforts clearly focused more on the latter. Thus, layoffs continued in 2023, but reaction on the part of those affected and legal action before the courts seems meaningless: Court deliberations take years, thus, seeking compromises may cause less damage to the person affected. On another level, under such circumstances, interference by media owners in editorial content, and self-censorship are easier to taking place, as stated by journalists themselves.

Courts implicitly recognise the secrecy of sources, while derogations in the law transposing the GDPR Directive should ensure journalistic protection. However, when taking into account changes in laws related to the protection of Communications and Court decision pointing to violations of Constitutional rights by provisions in the Law on Retention of telecommunications data, we consider that a new legal framework is needed in order to warrant the protection of journalists and respect of articles 8 and 10 of the European Convention on Human Rights. In this respect, despite decriminalisation of libel, the absence of any anti-SLAPP law threatens journalists and media freedoms. In the meantime, there has been an agreement on the EU Anti-SLAPP Directive (Daphne's Law), which Cyprus will be obliged to transpose to the national legislation as other EU member states^[26]. No physical attacks against journalists have been recorded in 2023.

No change has been recorded for the **Independence and effectiveness of the Media Authority**, with the risk remaining at 28%. The law on Radio and Television Organisations L. 7(I)/1998 has established an authority independent from political influence, with its own budget and resources. Its decisions are immediately executable, subject to review only by courts. With the transposition of the AVMS Directive 2018/1808, new provisions aim at explicitly confirming and enhancing this independence. Some drawbacks in the work of the Authority are the absence of strategic planning, limited transparency on its work, other than the publication of decisions imposing sanctions for violations of the law, and limited regulatory work.

Selection and appointment criteria of the chairperson and members of the Authority still remain very generic, while appointment lies exclusively with the powers of the Council of Ministers, with no law clause requiring any kind of consultation.

A very serious drawback is the fact that, since 2009, the Authority publishes no annual activity report. A provision introduced with the transposition of the AVMS Directive 2018/1808 into Cyprus law in late 2021, requires the drafting of an annual report to be submitted to the President of the Parliament, without setting an obligation for the Authority to publish it. No information has been made public whether this obligation was met. This sustains a situation which limits accountability towards the public and denies transparency of a public body responsible for a critical sector in society and fundamental rights, freedom of expression and freedom of the media.

Universal reach of traditional media and access to the Internet is the indicator with the best rate, following several years during which Cyprus trailed behind most other EU countries in respect of access to the Internet. The risk rate remains in low level, although it has increased from 8% to 27%, because of new criteria regarding broadband speeds to the Internet. The public service media (PSM) and broadband coverage are at 100%, access to broadband is 92.3% of households and Internet speeds are at 43 mbps.

Focus on the digital environment

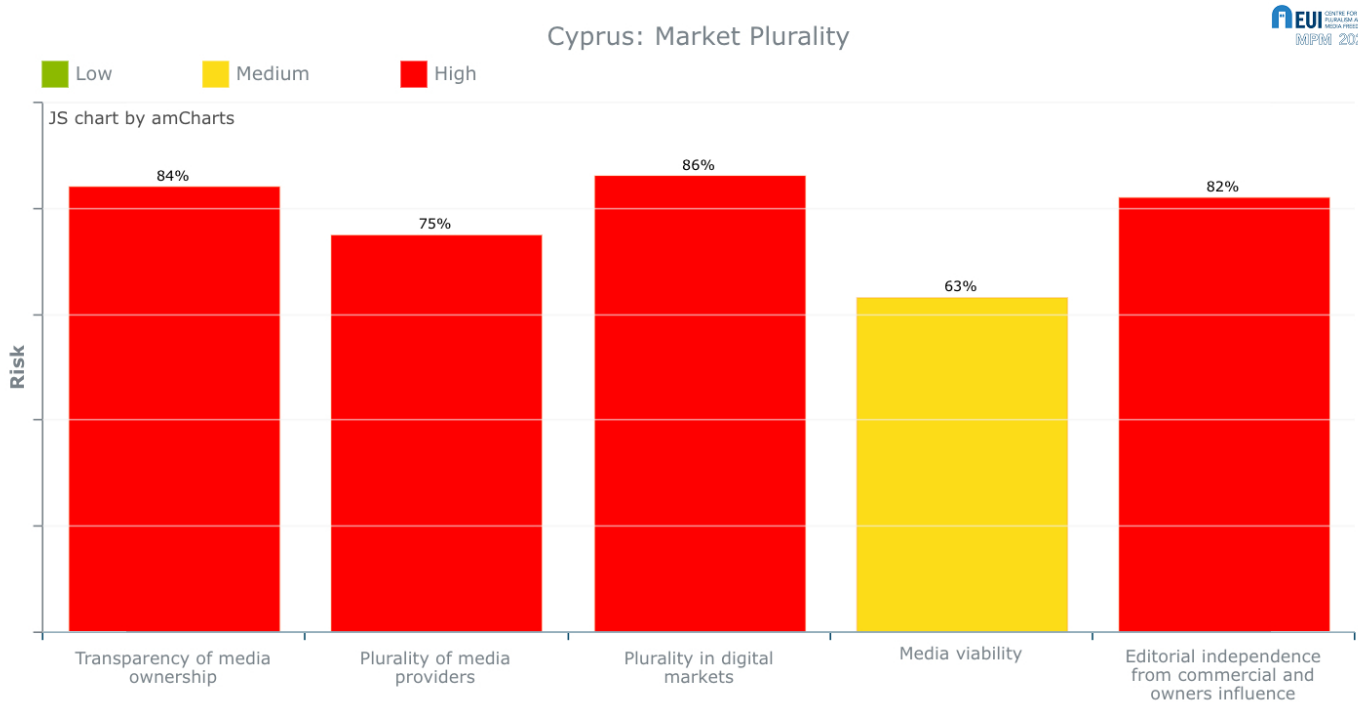
There is no law specific to online media and communication and relevant issues are dealt with under laws on traditional communication. Neither the government nor platforms publish any reports on online interference, filtering or removing content. Limited or no transparency regarding government requests for data and preservation to online platforms create grey areas regarding respect of free expression. Information provided by platforms is not sufficiently enlightening about how they use the powers they dispose.

The digital safety of citizens and journalists alike remained an issue of concern in 2023. The view that Cyprus has served as a hub for the sale of surveillance equipment and software has not received any convincing answers by the Government. Claims by a former journalist and former presidential aide and independent evidence provided that corroborate his claims that his laptop and mobile telephone had been hacked, have remained without answers /investigation by the authorities. Secrecy and lack of transparency from the authorities entertain existing suspicions that they practice surveillance beyond the scope of legitimate concerns.

The public service media (PSM) and broadband coverage are at 100%, access to broadband is 92.3% of households and Internet speeds are at 43 mbps. The situation in respect of net neutrality is at low risk. However, only four internet service providers (ISP) are present in the market, which limits options available to users.

3.2. Market Plurality (78% - high risk)

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



The area of **Market Plurality** not only remains the worst performing sector in the broader context of media pluralism, with four of the five indicators in the high-risk zone, it presents a deteriorating picture with the risk climbing higher in 2023. The risk passed from 73% to 78%, a picture that emerged following the abolishment of all restrictions on media control and ownership with the amendment of the law on Radio and Television Organisations L. 7(I)/1998 in July 2023^[27]. The high risk scores for **Transparency of media ownership**, for **Plurality in digital markets** and **Editorial independence from commercial and owner influence** have risen higher to over 80%, while **Plurality of media providers** remains at high risk. **Media viability** has shown a slight improvement, with the risk at the edge of medium to high risk.

Days after the release of the European Commission report “Rule of Law 2023” where concern was expressed about the problematic situation in respect of media ownership, transparency and plurality of media providers, the House of Representatives amended the law on Radio and Television Organisations 7(I)/1998 abrogating media shareholding, management, family ownership and other restrictions. No study, no public consultation, no expert view preceded the amendment. According to the minutes of the parliamentary committee, the Radio Television Authority had stated that it had no objection to the amendment. Following the amendment, the Authority has not proceeded to any analysis in order to anticipate the impact of the changes on media pluralism and ownership concentrations. It seems that they will simply wait to see what will be the impact.

Transparency of media ownership remains at high risk with an increase from 81% to 84%. To the previously existing reasons of the problematic situation, new ones have been added; there was a complete absence of regulation for digital media and of ownership transparency obligations for print media; this was leading to inefficiency of the law on radio and television organisations in fully ensuring ownership information in cases of cross-media shareholding. Following the law amendment, shareholding thresholds in other media that were required before, are now abolished, a condition that makes it even more difficult to the RTv Authority to verify ownership. This is because the abolishment of ceilings /thresholds in shareholding allows to one person to be shareholder to more licensees, while one person can also be a member or even chairperson in the governing body of as many media as possible, provided this person has no shares. This is not only an issue of plurality; it is also a problem on how the control by the regulator can be conducted if shareholding, or part of it, is via subsidiaries or associated companies. The enforcement of the existing clause about beneficial /ultimate ownership is doubtful, while there is no relevant provision in laws on print and digital media.

Even with the rules in force before the amendment, media and cross-media shareholding in AVMS was not fully transparent; no ownership data on print media was made available to any media authority and no data at all about digital media. Also, information on ownership made available to the Radio Television Authority was not made available or was easily accessible to the public. Thus, while tracking or controlling sector and/or cross-sector ownership couldn't be ensured, it now becomes more difficult for the public to access critical information on who owns /controls the media.

The indicator **Plurality of media providers** is the domain where the impact is expected to be stronger, despite the seemingly slight improvement, at 75% from 79% in 2022. This is due to methodological changes and differences in calculating risks. When the question is about the authority that controls concentrations, there is in fact a new reality where the law amendment abolished all shareholding constraints for one person, all constraints of ownership or control by family members, all constraints for cross media ownership, almost all constraints for multiple media management. The only remaining ownership constraints apply to shareholding in more than one television or radio licensee that belong to a media group. As a result, one person can control through majority shareholding or management more than one radio or television licensee, a family of let's say 5 persons can each own or control one or more radio or television plus other media. Thus, controlling concentrations seems impossible under the new legal situation.

In the existing media landscape, there are only four dailies on the market, the market share of the Top4 television channels is over 90% and, according to non-official, non-audited data, their audience stands just below 50%, which means that pluralism is under threat. The situation in respect of radio appear more pluralistic (in numbers at least), but there are no reports to inform us how many of the radio channels broadcast news and current affairs programs. Under the project on local media for democracy, we were informed that from almost twenty radio channels with a local radio license, only 3-5 offer news and current affairs programs.

Under the conditions created after the aforementioned amendment of the law, it is doubtful whether the Radio Television Authority and the Competition Authority (through the Law on the Control of Concentrations Between Undertakings, L. 83(I)/2014)^[28] can control concentrations. Thresholds and other constraints in media law are either abolished or are inexistent for the print media and the digital media, so, since there are not any more specific clauses against media concentrations, it remains unclear which rules and how these rules should be applied by authorities in order to avoid concentrations.

The high risk in **Plurality in digital markets** has grown higher to 86% from 81%. In addition to the fact that the digital media sector remains an unknown field, with absence of any regulation, a split in the professional association makes it impossible to gather comprehensive audience data. However, unofficial estimates about the share of online advertising market point to around 70% share for online platforms.

Media viability appeared in a better position in 2023, which lowered the risk to medium at 63% against high in 2022 (69%). Media, which have been affected by the energy crisis and the impact on the economy, have shown positive results according to verified data, available only for radio and television. Data on income from advertising for digital and the print media, to which the authors had access, cannot be reliable because they are nominative, calculated on advertising space and time. With media coming into agreements and each applying different discounts, which in some cases are substantial, accurate calculation and comparisons are not allowed.

Verified data on television show that following a decline in income as from the second semester of 2021, a stabilization appeared during 2022 and early 2023. The picture for radio was consistently positive, with an increase in advertising income of more than 10% from 2021 through the first semester of 2023. The increase rate in the three latest semesters was higher than the level of inflation and growth rates, pointing at a clear positive trend. Media do not develop any new forms of income, but some started producing podcasts as a means of increasing the flow of audience.

State support is limited to a *de minimis* scheme accessible only to national newspapers^[29], but does not seem efficient enough to warrant viability; there is no support in any form for local media, for native digital or for radio. However, there have been thoughts about aid to television but no concrete information about decisions has been available.

The risk for **Editorial independence from commercial and owner influence** has again jumped from the medium zone (56%) to high risk at 82%. This has been influenced by methodological changes, with the inclusion of new questions. No efficient protections from owner influences is offered, while the non-separation of editorial and commercial departments within media is influencing content. Individual journalists are often active in the broader communication /marketing sector, which is impacting the risk level. Despite strong and strict labour laws regarding layoffs and dismissals or changes in employment conditions, the overall uncertainty and pressures on journalists' benefits are leading them to compromises; they do not seek to safeguard their rights, prerogatives and editorial independence through legal action, due also to the extremely slow administration of justice, which takes many years to complete.

The influence on editorial content is pervasive and evident in particular in online media, legacy and native digital. This is also visible in print media and to a lower degree in television, despite the law. Corporate news content continues to get frequent and priority reference and exposure, often with no distinction from editorial content.

Focus on the digital environment

The high risk in **Plurality in digital markets** has grown higher to 86% from 81%. In addition to the fact that the digital media sector remains an unknown field, with absence of any regulation, market data are completely missing, while audience figures are partial, with only some media included. This does not allow to have a comprehensive picture of digital media. However, unofficial estimates from advertising professionals indicate that around 70% is the share of online platforms.

Shareholding thresholds and other constraints in media law are either abolished or are inexistent for the print media and the digital media, so, since there are not any more specific clauses against media concentrations, the question emerges as what rules and how they will be applied in order to avoid vertical ownership concentrations.

Data on income from advertising for digital and the print media to which the authors had access, cannot be reliable because they are nominative, calculated on advertising space and time. With media coming into agreements and each applying different discounts, which in some cases are substantial, do not allow accurate calculation and comparisons.

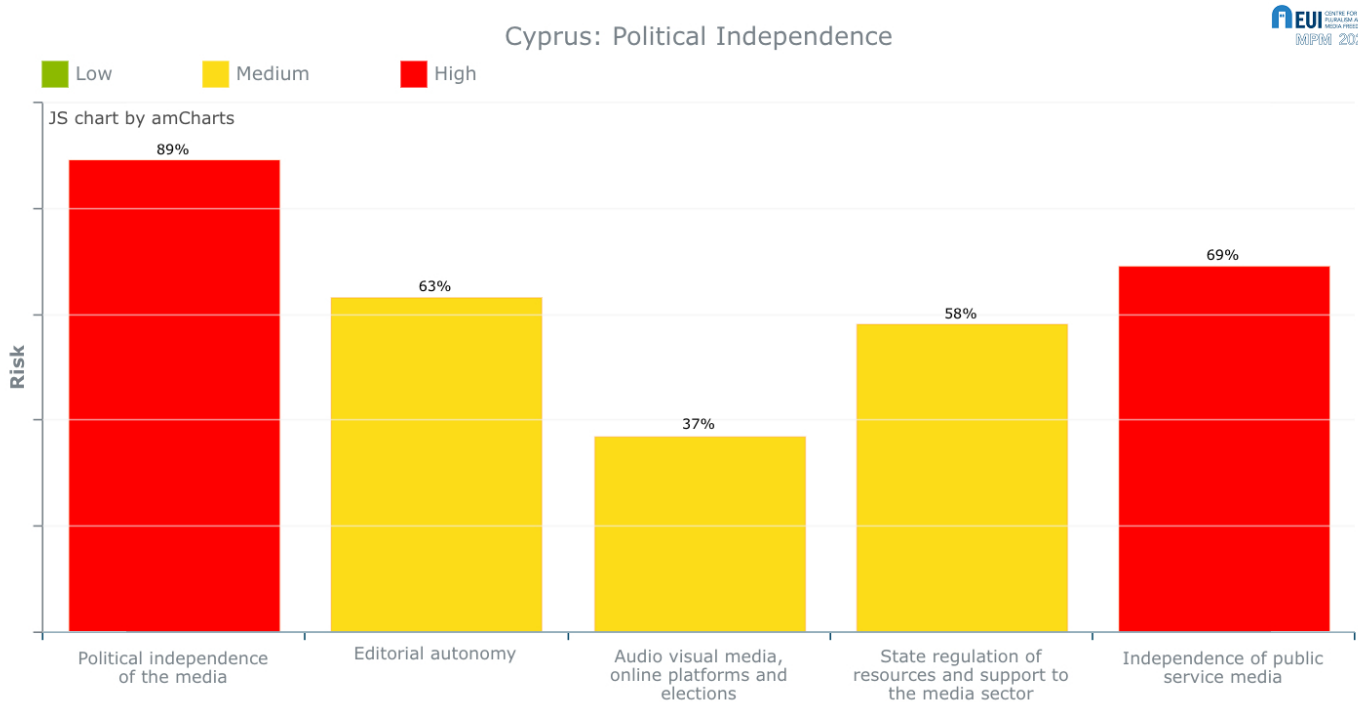
There is no State support for local media, for native digital or for radio.

Cyprus has still not transposed the EU directive on the minimum tax.

The influence on editorial content is pervasive and evident in particular in online media, legacy and native digital.

3.3. Political Independence (63% - medium risk)

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



The area of **Political Independence** shows for a second consecutive year a slight overall increase of the risk level from 61% up to **63%**. The main reason is the impact on the indicator **Political independence of the media** from the amendment of the Law on radio and Television Organisations L. 7(I)/1998, by which almost every barrier to politicians for media control and ownership has been removed. With the increase of the risk, although its value remains in the medium range, it is on the edge before crossing into high risk. An improvement to the indicator **State regulation of resources and support to the media sector** has slightly lowered the risk, although the competent State authorities have not given access to the authors to detail data about State spending to the media. Three indicators, **Editorial autonomy and audiovisual media, Online platforms and elections** and **Independence of public service media** have remained at exactly the same risk level as in 2022, with the latter still within the high risk bracket.

The rating of the indicator **Political independence of media** has shown a strong deterioration, with a risk level leap from 69% to **89%**, always within the high risk range. This is due to the fact that to the already existing problems that affect the risk level, a new one was added with a critical impact on it; the lift from the law on Radio and Television Organisations of 1998 of almost every barrier to the control or ownership of media by anybody, including politicians and State officials, has opened the door for a possible total political grasp on media. It should be recalled that there is no clause in the Press Law 145/1989 regarding print media ownership or other forms of control, while digital media are devoid of any regulatory framework, and gaps already existed in the law on radio and AVMS. At a different level, gaps and omissions in the law on incompatibilities between holding a public office and be active in some businesses are now bigger, given the changes in media law. With the latest amendment, ownership thresholds and other constraints that

previously applied to all persons, including politicians, now, allow anyone to own and control media without excluding, in any way, politicians from ownership/shareholding and/or control of radio and television, or even vertical ownership. No mention either to politicians in office. More concretely, art. 3.1(e) of the Law on Incompatibilities for persons occupying public offices (Law No. 7(I)/ 2008^[31]), applied to only officeholders, allows or rather does not disallow ownership or shareholding, an issue which was previously regulated by the media law. This is now lifted in media law, while, in addition, there are doubts about control and enforcement mechanisms given also that clauses in the law are not clear enough to warrant efficient control.

In respect of news agencies, the Cyprus News Agency is the only one in the Republic. It is a public law legal entity, with its board of governors appointed by the Council of Ministers. These appointments appear more and more politicized, while the agency's monopoly in the market and the fact that it feeds all media, in particular the online ones, with a steady flow of information and reports, is a major threat to media pluralism.

Generally speaking, the actual extent of political control over the media is made unclear by shortcomings in transparency. Still, there are severe concerns around the likelihood of political control via ownership means, that have been further exacerbated by the above-mentioned lifting of the barriers to ownership control. For instance, it is unclear if the Interior Minister (who is competent with respect to the entire media sector, PSM included), is still part-owner of the company IMH, which owns also media outlets. No updated data is publicly available.

The risk for the indicator **Editorial autonomy** remains unchanged, in the upper end of medium level (**63%**). Although editorial independence is guaranteed by both regulatory and self-regulatory provisions, editorial autonomy as a whole is not shielded by specific provisions, mechanisms and procedures that could effectively protect journalists from political interference. Appointment or dismissal of editors in chief is not governed by any regulatory framework and those occupying this post are in essence expected to pursue the political agenda of the media owner, sometimes without any visible interference. Media owners' agendas are most of the time a mixture of corporate and political goals. Following the change of government in February 2023, we do not have a clear picture of the relations between media and the executive, which was previously marked by the former government's attempts to manipulate the media through a variety of means. However, criticism of the present government by the media is severe, from the first moment it assumed office, and still (March 2024) continues. With regard to individual journalists, most often they practice varying degrees of self-censorship, while the existence of the Cyprus Problem, called "the national problem", has not stopped to generate a widespread sense of 'duty' for media owners and journalists to defend the government and promote its narrative, sometimes, on other issues too.

The risk level for the indicator **Audio visual media, online platforms and elections** has remained fairly stable at **37%**, in the medium-risk band. The PSM (RIK) is bound to ensure access and impartiality, but the respective regulatory framework is obsolete. While no effort to modernise it was made until recently, there is an ongoing process by competent authorities to amend the PSM law. This may mean also introducing updated provisions on fair treatment of social and political actors. In comparison, the legislation for private radio and television is more up to date, under these terms, but still no schedules of the coverage or reports are published, and more is needed to make this framework responded to today's standards.

Cyprus had Presidential elections, in 2023: despite justified complaints by many (of the 14) candidates that they were not offered access and coverage equal to that of candidates that opinion polls showed as leading the intentions of vote, these can hardly prove discriminatory treatment or exclusion. At the same time, one has to consider the pervasive coverage of the President of the Republic (as well as of the government

ministers), which was combined with an advertising campaign, during the electoral period. This issue, which has been observed in elections since 2021, with a disrupting effect on the fairness and equality of the election campaign, is not considered by the Radio Television Authority^[32] in spite of available law provisions.

In terms of political advertising, available regulation provides for equal opportunities, on radio and television. Political advertising must also be clearly identified as such. However, political communication and advertising on online platforms is not regulated and not addressed in any way in the law. Campaign funding regulation also has loopholes, posing serious problems to accounts auditing, according to the Auditor General.

A slight improvement is noted in respect of the **State regulation of resources and support to the media sector (58%)**, an indicator of critical value for media independence and pluralism. The negative evaluation in the previous report, caused by the refusal of authorities to provide data and information on the allocation of State resources to the media, has improved in 2023; the criteria applied for State advertising were furnished to the authors of the present report. However, instead of requested data and information about the allocation of advertising funds to the media, the PIO, sent in late April 2024 simply a list of information campaigns it conducted, information which is irrelevant to the needs of our assessment. Information published by the Treasury on its website in July next year is insufficient and opaque, because it is per company (which may own various media, information which is not always publicly available) and it does not include spending below 5000 euro. Detailed information had been provided yearly from 2017 until 2022 for the MPM, but denied since late 2022. A *de minimis* scheme is available only to dailies and a couple of national weeklies, not to any other media.

When it comes to frequencies spectrum, this remains a State resource fairly allocated to the media, in compliance with the Law on Radio and Television Organisations, L. 7(I)/1998.

Independence of public service media has remained unchanged at high risk, at **69%**. Although the approval of the PSM's budget for 2023 passed without strong interference by political parties, the usual complaints by parties and deputies about (according to them) unfair access to airwaves were repeated in early 2024 during the discussion at the competent parliamentary committee.

The generic criteria regulating the appointment of the PSM's Director-General and its governing board is often exploited by the government and political parties, which share the spoils. Independent expertise is hardly present on the board. The appointment procedure has changed; it starts with nomination of candidates to appointment by a new, consultative body, which makes its recommendations to the Council of Ministers for all semi-governmental organisations, including the PSM. The government and political parties have a decisive role on the PSM's budgeting; the government decides the sum of the State grant, where the parties sometimes withhold parts of the budget for approval at a later stage, which impacts on its unhindered operation. Beyond that, a more critical issue is raised since 2014 in connection to the powers of a newly elected President; the Law on entities of legal law (semi-governmental organisations) allows a newly elected government to dismiss the members of the governing bodies of these entities within 12 months from assuming office. The PSM is on the list of organisations affected by this clause. In addition, the chairperson of the consultative body supported the view that persons nominated for appointment should be among those that could support the electoral platform of the President elected. This is not in compliance with the expected role of a PSM. Moreover, it has to be reported that the governing board had, also in 2023, openly interfered in some programming choices, incidents which were exposed in the media and dented the integrity of the PSM^[NOTA_4153].

It seems that the PSM law is in the process of amendment, with the participation of public authorities; however, no public consultation has taken place and no information is available on whether any expert study was sought and, if so, which were the main lines suggested.

Focus on the digital environment

The Political Independence area scores 53%, in the digital environment.

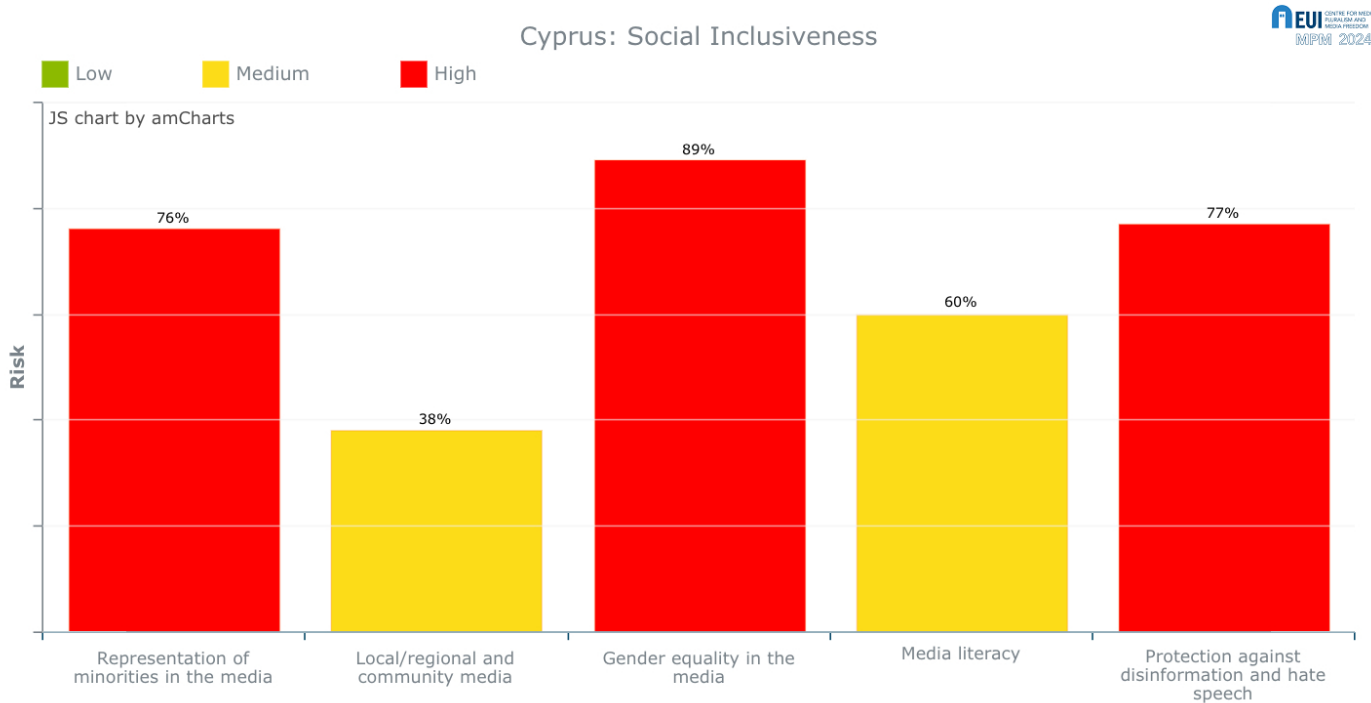
The absence of any regulatory framework on digital media and the lack of transparency in respect of ownership do not allow to have a picture of the state of affairs in respect of political presence in digital media. Moreover, the removal of barriers to ownership and control of radio and television, makes it easier for anyone to achieve horizontal control in digital media, but also vertical control in many media, including native digital media.

The Cyprus News Agency is a monopoly funded by the State and governed by persons appointed by the Council of Ministers. It feeds all media, in particular the online ones (legacy and native digital), with a steady flow of information and reports. Its influence on content is very strong, a risk for plurality.

Political communication and advertising via online platforms is not regulated and not addressed in any way in the law. Campaign funding regulation has loopholes and poses serious problems to accounts auditing, according to the Auditor General.

3.4. Social Inclusiveness (68% - high risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against disinformation and hate speech.



In recent years the risk to **Social Inclusiveness** in Cyprus has hovered between the top threshold of medium risk and the lower threshold of high risk showing little movement; It is deteriorating further this year with the risk rising to high, at 68% from 64% in 2022. In individual indicators, the risk for **Representation of minorities in the media** (76%), **Gender equality in the media** (89%) and **Protection against disinformation and hate speech** (77%) have all increased and are in the high risk bracket. The other two indicators, **Local /regional and community media** (38%) and **Media literacy** (60%) have remained stable, at medium level, identical as in 2022.

The increase in risk for the **Representation of minorities in the media** (from 65% to 76%) is due to the fact that no access or indeed any voice in the media is offered to non-recognised minorities in the country, which form a considerable part of its population and labour force. Equally, and, despite the parallel growth of other non-Cypriot communities on the island, over the years, private TV and Radio service providers continue not to have local productions in languages other than Greek. It must also be noted that the representation of migrants and refugees on many mainstream media, broadcasting, but also in print, is at best neutral but mostly negative. Some media reproduce uncritically the official discourse on migrants and refugees which is often negative and with connotations of a racist rhetoric and without recourse to impartial data and sources. Citizens of minorities recognised by law, of a total population of 5-6,000, have access on radio channels of the PSM, but not on private media.

The issue of access to media for people with disabilities has for years remained without proper response from the AVMS providers. Despite the emphasis on the need to offer such services through the transposition of the AVMS 2018/1808 Directive into national law in December 2021^[33], no significant

improvement on the matter is detected. While the Radio and TV Authority, acknowledges that the situation is stagnant, it considers that matters have begun to improve. In practice, both the PSM and commercial AVMS providers have regular short news bulletins in sign language and subtitling. PSM offers subtitling for its main nightly news bulletins shown in parallel on its second television channel though there appears to be no real push for expanding availability. At first sight, the situation on the private sector appears worse than for the PSM, but there is no report, no codes of conduct and no concrete data on the matter that would enable an accurate assessment.

The indicator on **Local/regional and community media** remains unchanged at the lower part of medium risk at 38%. Despite the persistence of major issues such as the non-recognition by law of community media and the absence of any State support to local/regional media, these exist (especially radio and online) but the sector is not developed^[34] as a result, among other, of the small size of the country. In any case as the Local Media for Democracy^[34] project recently showed, locally implanted television organisations in Cyprus broadcast nation-wide and cover issues of local interest; the ubiquitous presence of national media across the country mitigates the risk of news deserts.

The risk level for the indicator **Gender equality in the media** has increased, remaining in the high range at 89% compared to 83% in the 2022 edition of the MPM. General and binding laws for the promotion of gender equality and respect for women's rights do address, among others, issues of employment, education and training, remuneration and motherhood /fatherhood^[35]. They act as a mitigating factor to the fact that neither the PSM nor commercial AVMS providers have elaborated in-house gender equality policies. However, the crux of the problem is that media providers have not so far taken any steps for adopting a policy or even considered programming that aims at establishing a gender balance and to fight stereotypes. Pronouncements are frequently made to stress the need to improve the situation, but, in practical terms, little is achieved by individual in-house initiatives. There is still a considerable gap in the presence of women in media management boards and in executive positions. In journalistic positions there are a few women editors in chief but the domain remains strongly male dominated. We note that, in early 2024, new appointments in the governing council of the PSM increased female presence from one member to four out of a total of nine. It is noteworthy that the names of members of the governing council are not posted on the official website of the PSM; only that of the chairman is displayed.^[36]

With regard to access to media programmes by women as experts in news and current affairs programs, despite improvements recorded in the latest survey by the *Global Media Monitoring Project (GMMP) "Who Makes the News"* (2020 monitoring), the situation remains poor though we do detect that there is a greater consciousness among the public about the problem and a demand to address it.

The risk level for **Media literacy** has remained stable at 60%, still in the medium range, as there is still no adopted policy framework on this matter or, indeed, on disinformation. Both these issues are not addressed in any systematic or comprehensive way. There are various and scattered media literacy actions by academics and civil society; we found more awareness raising actions in 2023 than in previous years, but not nearly enough or close to being effective. By law, the Cyprus Radio and Television Authority is tasked with Media literacy^[37], but it is a role to which delegated staff spend only part of their time, and activities remain limited in number and scope. Relevant activities are also taken up by the Cyprus Pedagogical Institute of the Ministry of Education and Culture which is active in promoting various projects in the educational system (some are in collaboration with the Cyprus Radio Television Authority). However, most of the Pedagogical Institute actions focus broadly on digital safety and the development of media skills online and not necessarily on news literacy which is more urgently needed. They are not inscribed within a

policy framework with dedicated budget and resources, which is a major backdrop.

Media literacy is present in the education system, but not integrated into the curriculum; some actions take place on a voluntary basis by teachers on matters such as digital identity, sexual identity, sexting, disinformation, violence against women, bullying etc. Some activities also exist within the Cyprus Safer Internet platform^[38] which is funded 50% by the EU and 50% by national funds with some tools for teachers and youths but there is no systematic utilization.

Cyprus has no strategy or any legal /regulatory framework specific to **disinformation**. The risk on the indicator **Protection against disinformation and hate speech** has increased marginally to 77% from 74% and is clearly within the high risk range. Having said that, the interpretation of the right to freedom of expression as provided in case law addresses in detail the issue of false information and truth and explains in which cases falsity is punishable^[39].

In terms of self-regulation the Cyprus Media Ethics Committee's Code of conduct has a specific provision about the unacceptability of the spread of disinformation.

Encouragingly there are a couple of new independent and voluntary fact checking initiatives^[41], involving academia and journalists, but they are little known and their potential to infiltrate or impact the mainstream or social media audiences appears limited. None of the media in Cyprus have fact-checkers and the problem is not only a matter of an absence of a culture of fact checking; the dire financial situation of the media themselves offers a pretext for not considering the need of recruiting (or training) fact checkers.

On hate speech specifically, Cyprus has ratified the Additional Protocol to the Convention on Cybercrime concerning the criminalisation of facts of racist and xenophobic nature committed through computer systems (Law 22(III)/2004). The key law on Combating Certain Forms and Expressions of Racism and Xenophobia, Law 134(I)/2011 targets all forms of dissemination of content and includes electronic media. Sexism and online sexism is addressed by the Law on the Fight against Sexism and Online Disseminated Sexism and relevant issues, L. 209(I)/2020.^[42]

The Office of the Ombudsman is the competent authority for issues of Equality and the Fight against Discriminations and for examining complaints about them. However, the crux of the problem is not individual complaints, but the elaboration of a policy framework and action to combat hate speech. Such a plan is missing, as there is absence of actual mechanisms to combat online and general forms of racism both at the State level and in the media.

Focus on the digital environment

The risk level for **Media literacy** has remained identical to last year at 60%, still in the medium range. This is indicative of the fact that though activities have gained somewhat higher visibility and have also increased numerically, they have not been substantive, they have not been conducted in the context of a broader strategy and more importantly have, consequentially, no real impact on the challenges faced by the country.

The risk level in **Protection against disinformation and hate speech** has remained within the high range, up some notches to 77% from 74% in 2022. The introduction in recent years of laws aiming to fight sexism and bullying, and violence against women might have contributed to raise awareness and consciousness, but no surveys exist to offer evidence of any improvement in the general environment.

In terms of the new context and proliferation of disinformation activities on social media and online platforms, the country is essentially unprepared. In December 2023 the minister of Justice and the Speaker of the House of Representatives discussed the prospect of drafting legislation concerning the spread of fake news, to 'modernize', as they said, Cyprus' statute books to deal with the matter. The Attorney General had also earlier in the year called on deputies to introduce a legal framework on (online) fake news and insults. On the basis, among other, of a draft that was presented to the House of Representatives twice, there is, concern that the approach to what is both a serious and complex issue would lead to the detriment of free speech. The matter has been returned to the ministry of Justice for re-evaluation.^[40]

It is encouraging that there are a couple of new independent and voluntary fact checking initiatives, involving academia and journalists. They are, however, little known and their potential to infiltrate or impact the mainstream or social media audiences appears limited. None of the media in Cyprus have fact-checkers and the problem is not only a matter of an absence of a culture of fact checking; the dire financial situation of the media themselves offers a pretext for not considering the recruitment (or training) of fact checkers.

4. Conclusions

Respect for Freedom of expression in Cyprus faces critical challenges that affect Media pluralism which has been negatively affected in 2023; the removal of all obstacles to media ownership concentration puts the media environment into peril. While no action has been taken for introducing a regulatory framework for the digital environment, initiatives for updating the Press Law, the OSM Law and the Law on commercial media are following processes sidelining the public and stakeholders. The draft of the Press Law was far from meeting the expected standards and ensuring media freedom and pluralism. Public consultation, expert contribution, responding to the need for ownership transparency and ensuring media pluralism by effectively disallowing ownership concentration remain critical goals for any media legal framework.

While media and journalists play a fair role in democratic processes, political bias, and political interference in the media compromise this role with deeper 'invisible' influences. They appear increasingly subjected to influences by commercial interests, while they are prone to reflect the owners' corporate and political agendas. Media literacy activities that may mitigate the dangers from external influences need a policy plan in order for literacy to efficiently protect from bias and disinformation.

Fundamental Protection:

- In the process of regulating media, authorities should set respect for established standards and pluralism as top priorities, adopt best practices, involve experts and all stakeholders and call public consultations. In addition, regulation and practice should protect journalists from surveillance.
- Beyond drafting guidelines, authorities should make further efforts to raise awareness of access to information and whistleblowers and, eventually, seek cooperation with civil society in this effort, also monitoring the enforcement of the law by all government departments.
- Unionised and non-unionised journalists and all media stakeholders need to reaffirm their role and reclaim their status to regain the public's trust. Promoting quality and excellence in journalism is a major requirement for the above.

Market Plurality:

- The media need to clear content from external influences and journalists should avoid other activities in the communication sector, to redeem their social role and reverse the decreasing level of public trust.
- In addition to claiming an institutionalised State assistance, media should seek new ways of making income that would effectively warrant their viability.

Political Independence:

- Authorities and political parties should revise their approach to media, they should respect media freedom. Through the ongoing effort for a new legislation on the PSM, they should warrant the unhindered operation of an independent PSM as a forum for free expression for all. Both the laws on

incompatibilities and media laws should introduce strict clauses that can warrant media independence avoiding any risk of political control through media ownership and/or management.

- Media professionals should seek ways to balance defence of their labour rights and claiming their editorial independence without harming the latter. Proving their independence may strengthen support for labour rights.

Social Inclusiveness:

- Authorities should set and ensure implementation of an obligation for media organisations to broaden access and give voice to more groups. Setting an obligation to adopt gender equality comprehensive policies is also imperative.
- The law must address the broader area of Community media, with the authorities providing the resources needed for their operation in the service of the community.
- The adoption by the authorities of a media literacy policy is becoming more urgent with every day passing and there is need not only to address today's but also to anticipate on emerging new challenges. Enabling citizens to respond to challenges by AI, hate speech and disinformation is critical for Democracy.

5. Notes

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Christophoros</i>	<i>Christophorou</i>		<i>Independent expert</i>	X
<i>Nicholas</i>	<i>Karides</i>	<i>Member of the Governing body</i>	<i>Institute for Mass Media, IMME</i>	

ANNEXE II. GROUP OF EXPERTS

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

First name	Last name	Position	Institution
<i>Giorgos</i>	<i>Frangos</i>	<i>Chairman</i>	<i>Union of Cyprus Journalists</i>
<i>Xenia</i>	<i>Xenofontos</i>	<i>Director Corporate Affairs & CSR at Digital Tree</i>	<i>Digital Tree</i>
<i>Eleni</i>	<i>Mavrou</i>	<i>Board of Directors</i>	<i>Dialogos Media Organisation</i>
<i>Marios</i>	<i>Drousiotis</i>	<i>Chairman</i>	<i>Cyprus Consumers Association</i>
<i>Sofocles</i>	<i>Markides</i>	<i>Member of the Board of Governors</i>	<i>RIK/CYBC. Public Service Media</i>
<i>Theodora</i>	<i>Maniou</i>	<i>Assistant Professor in Journalism</i>	<i>University of Cyprus</i>
<i>Michalis</i>	<i>Papaevagorou</i>	<i>Executive Radio Director, member of the Cyprus Media Ethics Commission representing radio organisations</i>	<i>Radio Kanali 6</i>

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