

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: Ireland

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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 Ireland the CMPF partnered with Roderick Flynn (Dublin City University), 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.** The Republic of Ireland occupies 70,274 kilometres across 26 of the 32 counties on the island of Ireland. In contrast to wider EU-wide demographic trends the Irish population is growing, and the 5.1m figure in the 2022 census was up 4% on the 2016 census (and saw the Irish population surpass 5 million for the first time since 1851)(Central Statistics Office, 2024a). As of April 2023, the Irish Central Statistics Office estimates that the population has increased to just under 5.3m (Central Statistics Office, 2024d).
- **Languages.** There are two official languages: English (spoken by 99% of the population) and Irish. 40% of the population claim linguistic competence in Irish but less than 2% actually use it on a daily basis.
- **Minorities.** Until the 1990s the weakness of the Irish economy contributed to a high level of outward migration (and, conversely, a low level of immigration). In consequence, Irish society has long been ethnically homogenous with the Travelling Community as the only ethnic minority (a status formally recognised in 2017). In the 21st century this has changed somewhat. In the 2022 census 23% of the population described themselves as other than “White Irish” or “White Irish Travellers”. 10% identified simply as “Any other white background”, 2.4% identified as “Asian” and a further 1.5% identified as “Black” (Central Statistics Office, 2024a).
- **Economic situation.** Assessments of the Irish economy are complicated by the significant presence of Foreign Direct Investment with the result that as of 2023 not only is Irish GDP about 31% greater than Irish GNP but even GNP significantly overstates the actual level of domestic economic activity. Since 2015 “Modified GNI” (Gross National Income) has been regarded as a more appropriate measure of national income as it strips out the impact of foreign-owned Intellectual Property assigned to Irish corporate subsidiaries for accounting and taxation purposes. However although there was a 3.8% increase in GNI recored in 2022, figures for 2023 have not been released at time of writing. Those caveats noted, CSO figures suggest that Gross Domestic Product (GDP) decreased by 3.2% in 2023 (driven largely by a 4.8%. fall in exports) while Gross National Product (GNP) grew by 4.4% . Other key economic indicators are also mixed. The unemployment rate remained low in 2023 (the February 2024 rate of 4.2% employment was virtually identical to the 4.1% rate in February 2023(Central Statistics Office, 2024c)) and although increases in the Consumer Price Index remain high (up by 4.1% in the 12 months up to January 2024 (Central Statistics Office, 2024b)), this is a much slower rate of increase than the 7.8% recorded in 2022. Despite this, the housing market remains highly problematic (with political consequences - see below). Although new dwelling completions increased by 10% in 2023 (Bolton, 2024), rates of homelessness also increased by 15% between January and November 2023.
- **Political situation.** Ireland's period of transition continues apace. The formerly dominant Fianna Fáil and Fine Gael parties have seen their combined vote share fall from more than 80% in the 1980s to 43% by the February 2020 General Election. In June 2020 the two parties entered into their first ever coalition with the support of the Green Party. The government is characterised by a rotating premiership which, as of December 2023 was held by Fine Gael leader Leo Varadkar. Despite this novel arrangement and pandemic conditions the administrative and policy structures of Irish government remain stable. Nonetheless, issues such as the housing crisis has seen support for the government parties decline. The broadly leftist/republican Sinn Féin party received more first preference votes in the 2020 election than either Fianna Fáil and Fine Gael and although opinion polls

in 2023 suggest a decline in support for Sinn Fein (from the 36% recorded in mid-2022 to 28% in early 2024 (Cunningham, 2024)), it continues to outstrip the other parties. However, the apparent declared unwillingness of other political parties to contemplate entering a coalition government with Sinn Fein makes it very hard to predict the composition of the next government after the next election (due no later than February 2025). The picture is further complicated by the untested support for far right political parties. Although the combined first preference votes of the two overtly far right parties which contested the 2020 election - the Irish Freedom Party and the National Party - amounted to less than 0.5% of the total votes cast, it is not clear whether such parties remain as marginal in 2023. Relatively high levels of immigration (driven in part by arrivals from war zones such as the Ukraine and Syria) have seen co-ordinated protests at locations earmarked to house such refugees (and, indeed, a wave of arson attacks on buildings designated for such housing). Though the racially-motivated riots in Dublin on the night of November 23 2023 may only have involved a few hundred people there is a sense that right-wing ideologies may be gaining wider support driven in particular by the spread of far right content via social media channels.

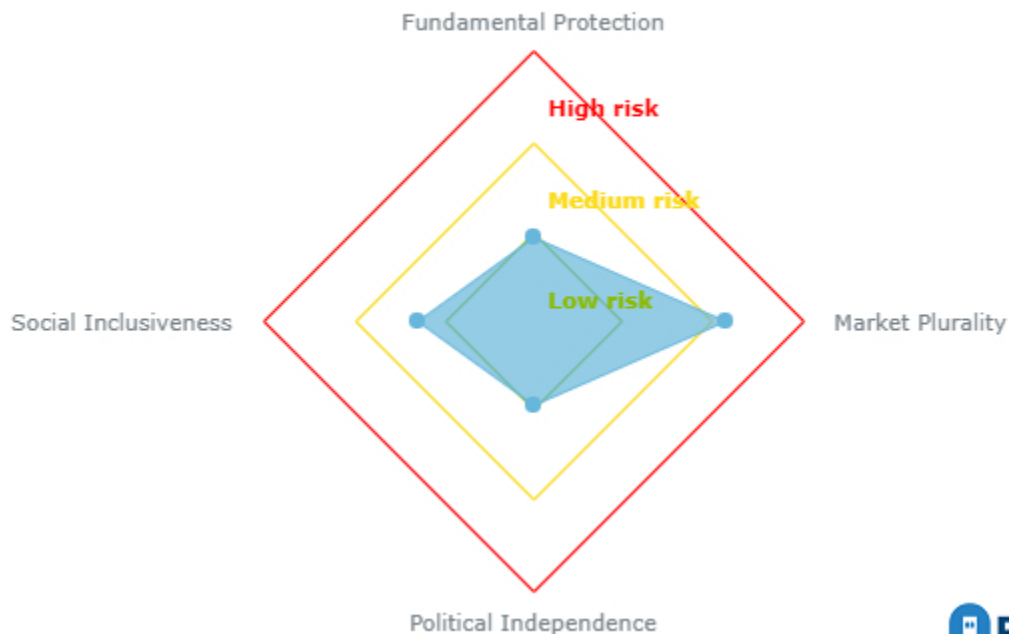
- **Media market.** Ireland's Anglophone status as a former British colony sees UK-originated media continue to play a significant role in Irish media consumption. As of 2023, the two PSM, RTÉ and TG4, account for 28% of linear television viewing, while the US-owned Virgin Media Ireland channels account for a further 20% (AGB Nielsen Media Research, 2024). UK-based channels (BBC, Sky and Channel 4) account for 19% of viewership. Broadcast television faces increasing challenges from Over-The-Top and video-sharing platforms. An estimated 600,000 Irish households subscribe to the leading SVOD service (Netflix). According to TAM Ireland//Nielsen Media Ireland in 2023, 62% of daily viewing is dedicated to linear (broadcaster) content, 10% with streaming services and 18% with video sharing platforms (YouTube etc.) (TAM Ireland, 2024). Furthermore for younger audience (25 -44), linear tv now accounts for a minority of all screen viewing time: even when linear TV viewing is combined with Broadcaster VOD (e.g. the RTE Player and the Virgin Media Player) consumption, total viewing for broadcasters reaches just 49%. UK-originated titles also occupy prominent positions in print news, accounting for approximately a quarter of daily and a third of Sunday print sales. The decline in print sales means virtually all Irish newspapers now rely on "readership" (combining online and print audiences) as a performance metric rather than circulation. By this standard, Newsbrands (the representative body for the newspaper sector) has argued that the total reach for newspapers has never been higher, reaching 82% of adults in March 2023.
- The 2023 Reuters Digital News Report suggests that for 52% of Irish adults the main sources of news are social media (20%) and online (32%) (Murrell et al, 2023). A further 32% cite television as their main source of news, whilst 11% and 5% respectively, cite radio and printed newspapers. That said, 9 of the ten biggest online news brands are rooted in print and broadcast legacy outlets and RTÉ remains the most-accessed news source offline and online. (Notably, however, the digital native TheJournal.ie is the second most accessed online source). Monetizing this expanded online reach has proved exceptionally difficult, however. There is an acknowledged (and increasing) dearth of independently-audited, public data on media revenues by sector in Ireland which makes it very difficult to objectively assess the financial health of Irish news media. That said, although figures from Radio Centre Ireland, PWC and Core Media respectively point to ongoing post-pandemic increases in the absolute value radio and television revenues, these increases are outstripped the rate at which Gross National Income has increased since 2019 so, in real terms, appear to be declining even in these sectors (Radio Centre Ireland, 2024; PriceWaterhouseCoopers, 2024; Core Media, 2024). Again in the print sector it appears that revenues continued to decline in 2023 both in absolute and relative terms. Although both the Irish Times Designated Activity Company and Mediahuis Ireland recorded modest 2% increases in

revenue between 2021 and 2022 (the most recent year for which figures are available) it seems highly unlikely that this growth related to print sales.

- **Regulatory environment.** The regulatory environment in which Irish media operate has, at least potentially, been transformed by the arrival of a new media Commission (Coimisiún na Meán) in March 2023. Coimisiún na Meán grows out of the 2022 Online Safety and Media Regulation Act which expanded the remit of the Broadcasting Authority of Ireland to take account of the new responsibilities stemming from the passage of the EU's Digital Services Act. This hugely expands the responsibilities of the new regulator which in addition to overseeing the licensing of radio and television stations, broadcasting complaints, the allocation of monies under the sound and vision fund, along with a myriad of other broadcasting related responsibilities now also has responsibility for effecting the various protections against online harm covered by the Digital Services Act. Eleven of the 19 companies identified by the European Commission in April 2023 as very large online platforms and search engines (as per the DSA's definition), are headquartered in Ireland. This places a very particular responsibility upon the new media Commission. Coimisiún na Meán also has responsibility for the regulation of online video platforms stemming from the latest iteration of the audiovisual media services directive. This expansion of responsibility is reflected in the growth of staff numbers. Whereas the Broadcasting Authority of Ireland had approximately 40 employees at its peak the new regulator has already being permitted to employ up to 160 staff with the understanding that this may further increase as in line with future expansion of regulatory activity. Given that the new Commission has not yet been operative for less than a year it is perhaps too soon to offer any assessment as to its efficacy: to a large extent its efforts have been focused on identifying which media institutions are now subject to its regulatory remit and drawing up appropriate content codes influenced by extensive public consultation. Coimisiún na Meán is not the only regulatory innovation, however. The Criminal Justice (Incitement Violence or Hatred and Hateful Offences) bill passed through the lower house of the Irish parliament in summer 2023 and is currently being debated by the upper house. The new legislation replaces the 1989 Prohibition of Incitement to Hatred Act. It both broadens the range of characteristics protected against hate speech but also offers new defences for engaging in such speech. The legislation has become something of a football in the Irish instance of the culture wars spreading through the western world. Some commentators (particularly those associated with a conservative or right-wing outlook) have complained that the new legislation constitutes an attack on freedom of speech. In response the Minister for Justice has emphasized that nothing in the new legislation criminalises offensive speech. Finally, it is expected that a new defamation bill will finally be published in 2024 following the publication of the draft heads of the bill in March 2023. Heavily influenced by a 2022 Department of Justice review of the existing 2009 Defamation Act, the new legislation is expected to: remove juries from defamation cases; offer clearer protections for public interest journalism; encourage measures to encourage prompt correction and apology and make it easier to direct online service providers to disclose the identities of those posting defamatory material online.

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

Ireland: Media Pluralism Risk Areas



JS chart by amCharts



As far as overall measurement of risk is concerned, the picture with regard to pluralism in Ireland media in 2023 is broadly similar to the situation prevailing a year earlier. It has, however, been a year where the role played by the media in Irish society and the manner in which media institutions are regulated and supported has been subject to public and political scrutiny of an unprecedented intensity. The main PSM has been in firefighting mode even since June 2023 and the Dublin riots of November 2023 demonstrated that the idea that the affordances of social media can be exploited for violent ends is no longer an abstract possibility.

Though the **Fundamental Protection** risk area remains a low risk at 31%, this is up from 27% in 2022 and creeping towards the medium risk threshold. That the independence of the newly established media regulator (“Coimisiún na Meán”) has been augmented by the role of the of the Public Appointments Service in its constitution is a positive. However, there remains obvious scope for affording more protection for the right to freedom of speech by better defining the qualifications to that rights and enhancing freedom of information by better resourcing that function within state bodies. Furthermore even if incidents of physical violence towards journalists remain extremely rare, there is extensive anecdotal evidence that they increasingly face operate in a context characterised by verbal abuse and other forms of harassment.

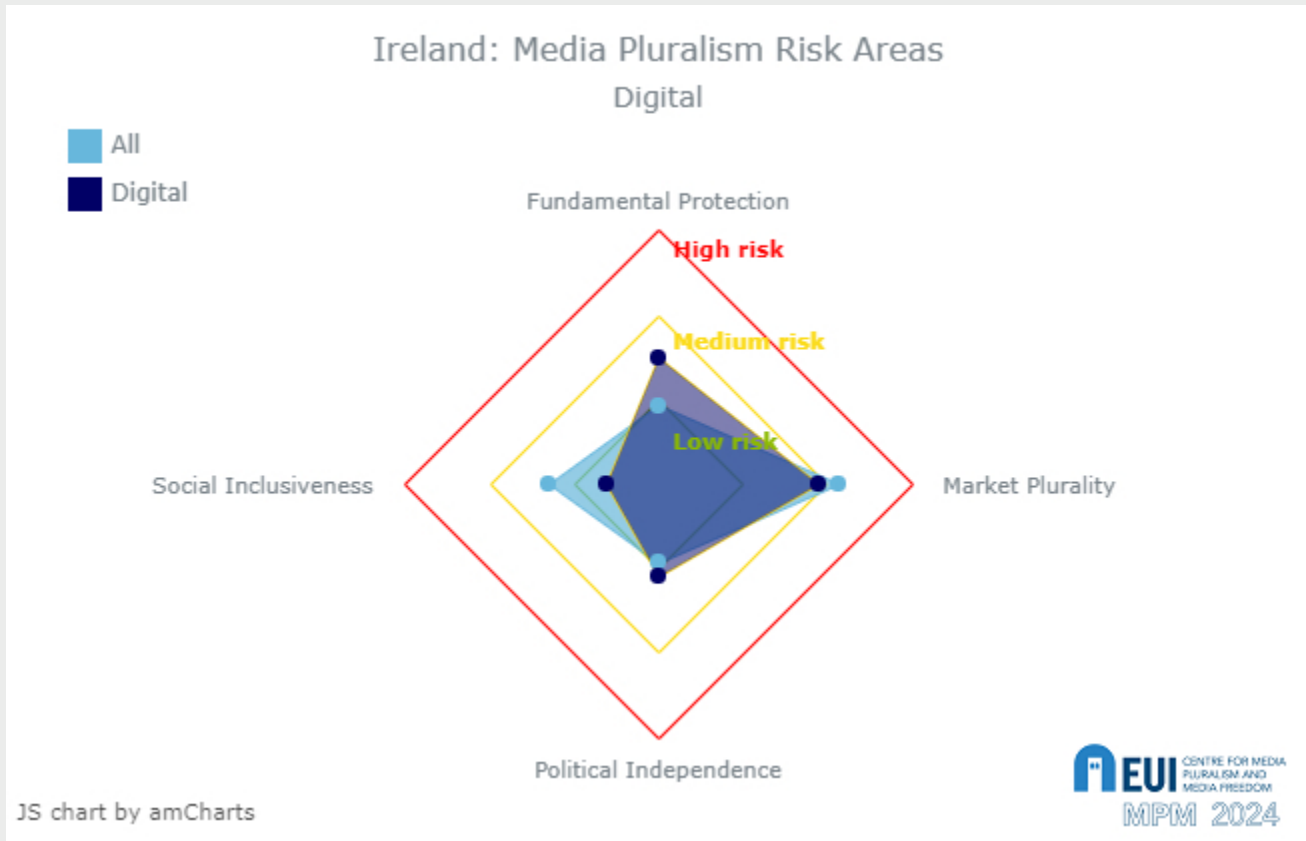
Again, **Market Plurality** with a score of 71% presents the greatest challenges to media pluralism in Ireland. On the positive side public access to information regarding global ultimate ownership of media organisations addressing Irish audiences is readily available via both the Mediaownership.ie resource and the detailed profiles contained within the Media Ownership Monitor Ireland project which was launched in February 2024. However, in most other respects the risks to market plurality remain very high. Despite the availability of an abundance of choice of media content in broadcasting and online, there is increasing concentration of ownership within the sector providing content expressly produced for Irish news consumers. Although this may well be a structural feature of a small, Anglophone media market, the absence of quantitatively defined limits on the extent of media concentration clearly also plays a role. Furthermore, although media revenues

have increased in absolute terms since the Ireland emerged from pandemic conditions in 2022, they have fallen far behind the rate of overall inflation and the growth in Gross National Income. Furthermore in some sectors – namely print – circulation and advertising revenues continue their downward spiral. This, in turn, creates even stronger financial incentives for further concentration of ownership. The Irish commercial television sector is already entirely constituted by a single company and there are obvious ongoing pressures towards consolidation in the regional press and local radio markets. Media outlets consistently assert that their very survival may depend on being subsumed into larger media corporations. This may very well be true but the absence of comprehensive and publicly available data regarding the financial health of these media outlets makes it very difficult to objectively assess such assertions.

Between 2022 and 2023, the risk with regard to **Political Independence** increased in lock step with that of the Fundamental area: from 28% to 31%. Irish media remain free from political interference and political parties remain at an arm's length from media ownership. There is, in any case little incentive for such direct political control given that politicians and civil society representatives enjoy relative ease of access to mass media outlets on an equitable basis. There remains a concern regarding the lack of transparency around both online political advertising and the opaque manner in which state advertising is distributed has been thrown in relief by the proposed provisions in this area within the draft of the European Media Freedom Act. The manner in which the larger of the two PSM – RTÉ – is funded has repeatedly been identified as the outstanding risk in the Political Independence area. In 2023 this risk was on the cusp of becoming a clear and present danger as the public element of the RTÉ's income imploded in the wake of a controversy around payments to high profile staff. However, the very commercial outlook within RTÉ that triggered the crisis grew out of the decades long reluctance on the part of the state to fund the station in a manner which would obviate the need to actively court advertising and sponsorship. Irish politicians subjected the broadcaster to extensive scrutiny in 2023 and made legitimate critiques of its action but there is no doubt that RTE's commercial DNA is itself the result of political action (or strategic inaction) over a period of decades. The assumption that the Irish public sphere could unproblematically be sustained through an alliance between public funds and market capital has never been subject to greater challenge.

The **Social Inclusiveness** risk area once again remained unchanged in 2023: a Medium risk at 43%. The place of local and community media in their respective markets is well established. The failure to properly embed a comprehensive conception of media literacy (one which goes beyond the prophylactic orientation of digital media skills) into secondary school curricula remains disappointing but media education networks such as Media Literacy Ireland (supported by Coimisiún na Meán) and the Irish EDMO Hub have brought the concept to wider attention outside a formal education context. Both institutions now operate in the context of the National Counter-Disinformation Strategy Group which began meeting in March 2023. While still engaged in an information-gathering phase the Group's establishment promises a move beyond the current – necessary – emphasis on fact-checking operations such as TheJournal.ie's FactCheck. However, efforts to address under-representation of minorities (whether defined by ethnicity, gender, sexual preference, gender-identity, disability etc) in media continued to produce little in the way of concrete results in 2023: the faces and voices of Irish media remain overwhelming white after a generation of net immigration while women often remain pigeon-holed in stereotypical categories in news and current affairs coverage.

Focus on the digital environment



In 2023, the risks to **Fundamental Protection** in online environment (50%) remained markedly higher than in the realm of legacy media (31%). The same guarantees for freedom of expression offline also apply online but it remains unclear what legal basis (if any) exists for the memoranda of understanding between Irish ISPs and the police on blocking access to websites containing child sexual abuse material. Beyond that there is no formal legal obligation requiring the state to report any additional filtering or removal of online content. (This is not to suggest that such filtering/removal occurs but rather we cannot know one way or the other.) Online platforms have an overt responsibility to remove harmful content, and most report this activity in publicly available transparency reports. (Notably Twitter/X does not appear to have published any data relating to community standards since 2021.) The context in which this activity occurs changed somewhat during 2023 with the establishment of Coimisiún na Meán which, amongst its other duties, will have responsibility for implementing the protections afforded by the transposition of the Digital Services Act in to Irish Law. Earlier assessments (from 2022) of how online platforms have implemented the EU's Code of Practice on Disinformation in Ireland concluded that it was difficult to arrive at a clear picture of how online platforms were operationalising the Code and we have no basis on which to think this has improved in 2023. Indeed, if anything there appeared to be less country-specific information available in 2023 about the implementation of community standards than in previous years.

With regard to online surveillance, although the Irish state has transposed both the EU's General Data Protection Regulation (2016) and the Law Enforcement Directive (2018) in a manner that offers some protections to journalists, the Irish retention of communications data regime remains problematic. The July 2023 enactment of the Communications (Retention of Data) Amendment Act 2022 as designed to address the incompatibility with EU law of earlier communications data retention legislation. However, although it has not yet been legally tested, the new Act retains some of the pluralism-

related flaws of the legislation it replaced.. Under the European Convention on Human Rights, surveillance aimed at identifying journalistic sources should "go through a heightened screening process including prior independent judicial approval". However, the 2022 Irish legislation makes no provision at all for the protection of journalists' sources.

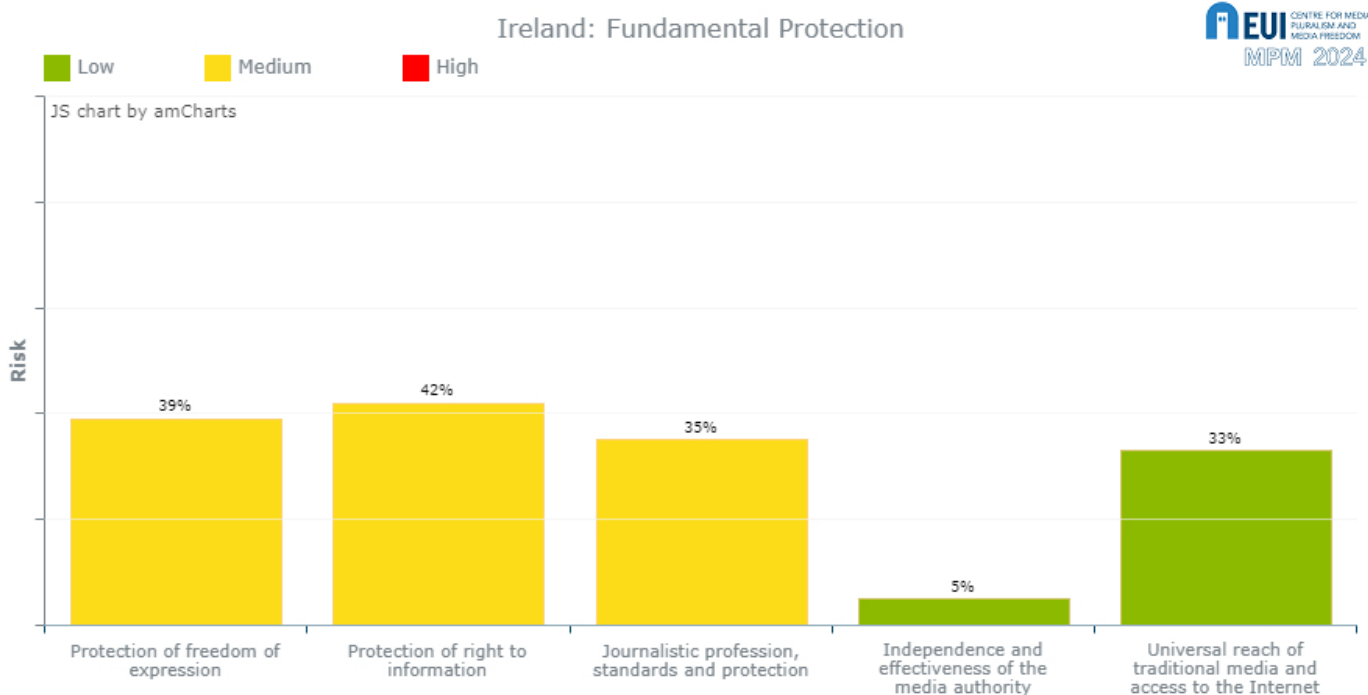
The digital sphere also poses huge challenges for **Market Plurality** although the 63% figure recorded for online risk constitutes a medium risk (in contrast to the high risk – 71% - associated with market plurality overall). That the online media markets are characterised by high levels of concentration is self-evident. However, identifying an empirical basis on which to draw conclusions about the implications of this for pluralism remains a profound challenge not least because it remains unclear as to what metrics might be used to measure the influence of online platforms in relation to both other platforms and legacy media. The same absence of strict upper limits on market share that characterises the regulation of legacy media markets prevails in the online sphere and there is little sense that Irish regulatory bodies have actively grappled with the challenges of seeking to regulate dominance in the online sphere. That the risk associated with the digital sphere in this area has declined, however, stems largely from the Irish government's transposition of European Council's Minimum Tax directive into Irish law via the 2023 Finance Act in October 2023. Even if the Irish state has strongly resisted the introduction of a specific digital services tax, the minim tax rules will clearly impact upon the myriad of Tech Giants headquartered in Ireland.

The risks associated with the areas of **Political Independence** (36%) in the digital sphere are lower than in other areas but there remain issues even here. Notably, the online risk for political independence falls into the medium category (as opposed to the low risk coding for political independence as a whole). The key issue here is the fact that Parts 4 and 5 of the 2022 Electoral Reform Act remain in suspended animation. Part 4 requires online platforms to ensure that all online political advertisements are overtly identified as advertising to provide transparency notices detailing who paid for the ad, how much it cost, whether it was micro-targeted and, if so at which audience. The European Commission, however, found that Part 4 and 5 aspects of the 2022 Act were incompatible with articles 14(1) and 15(1) of the E-Commerce Directive. The Irish Government did issue a confidential response to the European Commission but this has not led to any obvious change. In consequence, political advertising online (something which is entirely prohibited in Ireland broadcasting) remains essentially unregulated.

Finally, that the risk associated with **Social Inclusiveness** online (20.5%) is so much lower than the overall risk associated with this area (43%), and down from the 26.5% recorded in 2022, owes something to the commencement of the National Disinformation Strategy Group and the – admittedly slow – progress of the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill through the Irish parliament. Both initiatives are overtly concerned with the spread of disinformation and hate speech in the online space and, given the manner in which the Dublin riots of November 2023 were inflamed by both disinformation and hate speech all and any progress in this area has to be considered urgent.

3.1. Fundamental Protection (31% - low 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 overall Irish score in the fundamental protection area is 31% which though up 4% on the 2022 result still places Ireland in the low risk score. The increase in risk is more apparent than real, however, and stems almost entirely from a change in the source used to calculate internet access across the MPM. However in the digital realm, the risk increases to 36%, placing it in the medium risk category ((see below).

The 39% score recorded in 2023 keeps Ireland at the lower end of the medium risk segment with regard to the **Protection of freedom of expression** indicator. In practice, Freedom of Expression is generally respected, and is explicitly recognised in Article 40.6.1.i of the Irish constitution. However that right is subject to considerations of “public order and morality” which are not well defined legally and which arguably better reflect the period in which the Irish constitution was originally written (the 1930s). A 1996 Constitution Review Group recommendation that Article 40.6.1.i be replaced by a new clause informed by the much stronger freedom of expression protection offered by Article 10 of the European Convention on Human Rights has not been pursued. More recently, the introduction Criminal Justice (Incitement to Violence of Hatred and Hate Offences) Bill, which updates the definition and defences for hate speech has been cited – mainly, though not exclusively, by conservative commentators – as constituting a threat to freedom of expression on the grounds that it does not clearly distinguish between speech which is “merely” offensive and that which constitutes incitement to hatred.

The **Protection of the right to information** remains a medium risk at 42%. A comprehensive freedom of information (FOI) regime was introduced in 1997 and updated in 2003. It was replaced by a similarly comprehensive regime in 2014 under the Freedom of Information Act 2014. Restrictions potentially limiting access to official documents are in line with Council of Europe guidelines and applicants who are refused

access to information have two – escalating – avenues of appeal. Having selected a low-risk coding for this indicator in earlier iterations of the Monitor we have opted for medium in 2022 and 2023. On taking office in January 2022, the Information Commissioner Gerard Deering was presented with an internal briefing document detailing extensive weaknesses in the FOI system relating to inadequate resourcing and training. In his 2022 annual report (published in 2023) Deering expressed his disappointment at the increasing numbers of “deemed refusals” (where a public body fail to issue a timely decisions on an FOI requests) stating that “I can only assume that the increase is generally as a result of the failure of some FOI bodies to adequately resource the FOI function” (Information Commissioner, 2023).

Against this here have been some case law developments relating to FOI - the Supreme Court decisions in *The Minister for Communications, Energy and Natural Resources v The Information Commissioner* [2020] IESC 57 (25 September 2020) and *UCC v The Information Commissioners*[2020] IESC 57 –which seem likely to make it harder for public bodies to refuse FOI requests going forward.

Protection for whistleblowers has also been integrated into Irish regulatory frameworks since the passage of the 2014 Protected Disclosure Act. The Act was updated by the passage of the July 2022 Protected Disclosures (Amendment) Act which formally entered operation in January 2023 (albeit a temporary derogation was put in place for employers with between 50 and 249 employees until December 2023). The new act transposed the 2019 EU Whistleblower Protection Directive into Irish law, encompassing private sector organisations with 50 or more employees and expanding the definition of protected workers to include job applicants, shareholders, members of boards and volunteers. It also expanded the range of actions that could be seen as penalising a whistleblower. In general Irish protections for whistleblowers are considered quite strong, although as the chief executive of Transparency International Ireland noted in a November 2023 interview it remains the case that “if someone wants to make life difficult for a whistleblower, then they can” (Lillington, 2023).

The medium risk 35% score for the **Journalistic profession, standards, and protection** has remained unchanged for several years from 2021. That Ireland was rated second (of 178 countries) in Reports Without Borders Press Freedom Index for 2023, reflects the fact that Irish journalists are generally free from official harassment and the threat of arbitrary arrest. There remain risks, however, relating to conditions of employment (with permanent jobs now increasingly unusual although results from the Worlds of Journalism study for Ireland published in 2023 suggests that journalism may not be significantly more (or less) precarious than other forms of employment in Ireland.

With regard to the safety of journalists. the European Centre for Press and Media Freedom’s Mapping Media Freedom project did record a marked increase in Irish incidents in 2023 and there is anecdotal evidence to suggest that journalists have been subjected to at least verbal harassment (querying their objectivity) when covering populist protest movements. For the most part, however, the Mapping Media Freedom incidents refer to efforts to discredit journalists, remove their funding or launch defamation suits against them rather than physical violence. Notably, the Worlds of Journalism study found that more journalists (47%) were concerned about their mental health and wellbeing rather than their physical health (26%).

The absence of legislation against strategic lawsuits against public participation (SLAPPs) remains a concern. However, in line with the 2022 Review of the 2009 Defamation Act, the draft version of a new Defamation Act published in 2023 (and expected to be published in full in early 2024) envisages introducing a new mechanism to allow individuals to apply for “summary dismissal of defamation proceedings that

he/she believes are a SLAPP.” It is assumed that the sections relating to SLAPPs will also effectively transpose into Irish law the provisions of the EU Anti-SLAPP Directive which the European Parliament approved in February 2024.

2023 also highlighted the ongoing legal ambiguity regarding protections (or lack thereof) for journalistic sources in Ireland. Although in June the Irish Supreme Court upheld a Court of Appeal’s decision that finding that a warrant obtained by gardai to search a journalist home and to seize his phone in 2019 should be quashed on the grounds that protection of journalistic sources ‘integral’ to free press, the Court judges also noted that the case highlighted the "lack of safeguards designed to protect journalistic privilege” (O’Faolain, 2023). The Court added that the case pointed to "serious shortcomings” in the laws governing search warrants suggesting that the Irish parliament might wish to to "urgent consideration" to.

The drop in the risk (from an already low 10% in 2022 to 5% in 2023) associated with the indicator for the **Independence and effectiveness of the media authority** reflects the diminishing role of the government in appointing the Commissioners who, since March 2023, have constituted the new Media Commission (Coimisiún na Meán). Under the 2009 Broadcasting Act, the Minister for Communications directly appointed five of the 9 members of the Broadcasting Authority of Ireland, the predecessor body to Coimisiún na Meán. (The remaining four were also nominated by the Minister albeit subject to the advice of a Parliamentary Committee.) However the Online Safety and Media Regulation (OSMR) Act 2022 which established Coimisiún na Meán emphasises the role of the Public Appointments Service (PAS) in making Commissioner appointments thus significantly diluting the scope for any political (or other) interference in the appointment of Commissioners. The OSMR also offers detailed criteria for potential Commissioner candidates to ensure that Coimisiún na Meán remains at an arms length from any interest in the entities regulated by the Commission.

The apparently high increases in the risk associated with the **Universal reach of traditional media and access to the internet** (from 8% in 2022 to 33 in 2023) does not in fact reflect a decline online or legacy media access. 100% of the population can access to PSM content through cable, satellite or DTT infrastructures if they so choose. However, as noted below, a change from 2022 to 2023 in the sources assessing broadband coverage and access has effectively driven up the risk score under this indicator.

Focus on the digital environment

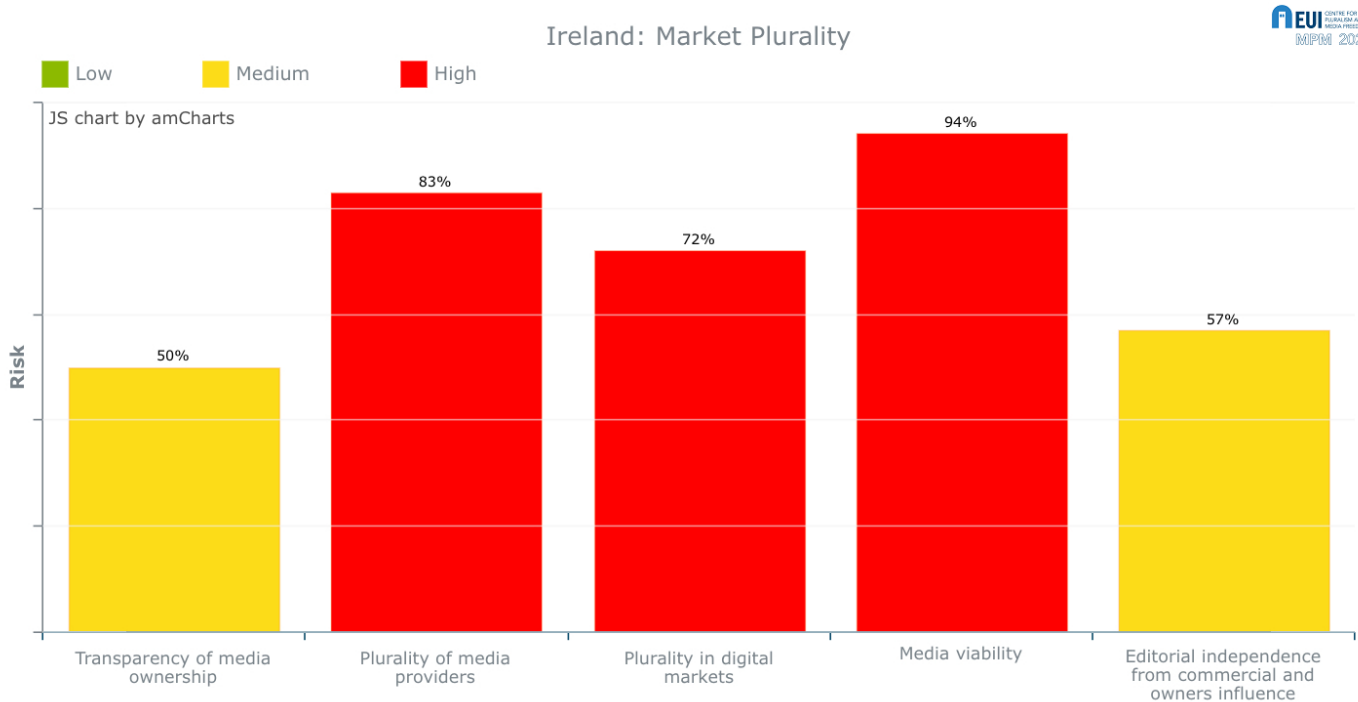
The higher risk recorded with regard to fundamental protections in the digital sphere (36% as opposed to 31% in the non-digital media space) stems to a degree from a simple lack of data/information especially at a disaggregated national level. For example, in considering freedom of expression online, the fact that many platforms do not report about filtering and removal of content at a national level makes it impossible to assess whether such actions are transparent and free from arbitrary decisions. Similarly there appears to be no obligation on the Irish state to report any interventions that might directly or indirectly to blocking or filtering of online content. That the Irish state or state actors (such as the police) might engage in the monitoring of online content is hardly surprising and there are many instances where such actions can reasonably be regarded as entirely legitimate. However, the specific manner in which the Irish police have entered into agreements with ISPs since 2014 via Memoranda of Understanding (MoU) to block images of child pornography does not appear to have a clear basis in legislation. (Obviously no-one disputes the need to block access to such content but the MoU mechanism potentially creates places relatively unregulated influence in the hands of the Irish police over internet content.)

There are other distinctions between the digital and non-digital realm worth noting. While protection of journalistic sources is relatively well-protected in Irish case law, the various iterations of Retention of Communications Data legislation between 2011 and 2022 have consistently undermined the digital security of journalists. The European Convention on Human Rights holds that surveillance aimed at identifying journalistic sources should "go through a heightened screening process including prior independent judicial approval". However the Communications (Retention of Data) Amendment Act 2022 makes no provision whatsoever for the protection of journalists' sources.

Finally it should also be acknowledged that the basis upon which internet access is measured in Ireland has altered between the 2022 and 2023 implementation of the MPM and the impact of this appears to have raised the risk associated with broadband coverage and internet access. (MPM previously relied upon DESI indicators published by the European Commission. However since the Commission is no longer publishing this data, the MPM has shifted to data from Eurostat, which do not measure the concept in entirely same way. With the use of new data, other countries that have moved significantly ahead, raised the risk "bar" for low and medium risk for individual countries – such as Ireland - assessed within the context of the MPM.)

3.2. Market Plurality (71% - 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 Market Plurality area remains the highest risk in area, the 71% figure in 2023 essentially unchanged from the 72% in 2022. Although there were declines in the risk associated with transparency of media ownership and pluralism in digital media, these were largely cancelled out by a marked increase in the risk associated with the economic sustainability of media.

The 50% risk **Transparency of media ownership** indicator marks a drop of marks a drop of 13 percentage points from the 2022 figure of 63%. The decrease is accounted for by a number of factors. Information about the global ultimate ownership of most Irish-facing media firms is readily available by the Coimisiún na Meán-funded Mediaownership.ie resource. This has been augmented by the Media Ownership Monitor Ireland website created by the Fujo and the German Global Media Registry civil society organisation using funding from the European Commission-financed European Media Ownership project. (The current author acted as Irish Principal Investigator on the MOM Ireland project.) The latter offers detailed profiles of media outlets and their owners at both an institutional and individual level. Both resources anticipate the kind of public register of media ownership envisaged by the European Media Freedom Act. That the risk is not lower still owes much to gaps in related Irish legislation. the 2014 Competition and Consumer Protection Act requires the BAI to survey of media ownership in Ireland but there is no media-specific legislation requiring media outlets to make this data public. Furthermore, media companies are only required to report their financial returns if they have an annual turnover of €12m or more. Since many Irish media outlets fall below this turnover threshold our understanding of the financial structure of the industry is, at best, opaque.

Though the risk relating to the **Plurality of Media Providers** remains very high at 83% in 2023. There is no upper limit on the number of outlets or market share which may be controlled by a media owner in Irish legislation although Coimisiun na Meán's 2019 Ownership and Control Policy considers ownership of more than 25% of licenced commercial radio stations to be "unacceptable". And virtually every legacy media sector in Ireland *is* objectively highly concentrated. In 2015 there were four television broadcasters based in Ireland. As of 2023 there are just two. In radio, 2023 saw Bauer Media add two more stations to the group of five they acquired from Communicorp in 2021 and in the regional press sector Formpress consolidated its status as the single largest player by completing the acquisition of the Mayo News in February 2023.

The extent of concentration is disguised to some extent by the presence of a plethora of overseas players in the print, broadcast and, of course, online media spheres. On television, Irish viewers typically have access to 100s of channels via satellite and cable distribution channels. However, only two stations of these overtly address the Irish market and provide Irish news and current affairs content. Meanwhile in the Irish radio sector, the degree of diversity is conditioned by the fact that all 34 licenced commercial stations rely on a single source - Bauer Media - for their national and international news feeds. In sum: a multiplicity of channels does not necessarily mean a diversity of sources providing locally relevant news.

Furthermore a proper understanding of the extent of concentration is rendered impossible by the ongoing difficulties in accessing reliable data relating to media market shares. With regard to revenues, our research has never been able to establish what percentage of their respective markets the top four players in print, radio, television or digital media account for. Some data is available via the annual reports of the largest media institutions but rarely in disaggregated form that would permit identification of media sector-specific revenues in Ireland. The situation is better with regard to audiences, especially for radio and television, but we are forced to rely on indicative figures for print and there is little in the way of consistent, directly comparable metrics for online media consumption in Ireland. This lacuna presents considerable, if not insurmountable, challenges to understanding the disposition of media influence in Ireland.

The **Media Viability** indicator has dramatically increased in 2023, up to 94% from 74% in 2022. There are a number of issues at play here. In absolute terms 2023 almost certainly saw increased revenues in the broadcasting sector as a whole. "Almost" because, we are reliant on estimates from sources such as PriceWaterhouseCoopers and Core Media. More definitive figures from TAM Ireland suggest that commercial revenues increased from €249m in 2019 to €281m in 2021 but, as always, the release of these figures lag well behind the actual passage of time. We do have definitive commercial radio revenues: Radio Centre Ireland stated that total commercial radio revenues for 2023 came in at €163.9 million, up 4% versus 2022. Such increases should drive the risk down. However, when compared against the rate at which Gross National Income has increased (more than 24% between 2019 and 2022 according to the Central Statistics Office) the gains in broadcasting appear far less impressive. Furthermore although print remains something of a black hole in terms of public access to data, both Core and PwC point to absolute and GNI-relative declines in newspaper advertising revenues between 2019 and 2023. (That the largest newspaper group - Mediahuis Ireland - has twice sought editorial redundancies in the period between the 2022 iteration of the MPM and the 2023 version is further evidence of malaise within the sector.) There is even more uncertainty with regard to digital native media: digital advertising as a whole seems to have seen significant growth in 2022 (the most recent year for which figures are available) but, again, there are no disaggregated figures available for digital native news media as a whole.

The outlook with regard to local media is mixed and increasingly medium-specific. The long post-2008 decline of local print media sector appears to have continued apace in 2023. In an April 2023 interview, Peter Vandermeersech, CEO of Mediahuis (the second largest regional print group in Ireland) stated that he expected printed daily papers to essentially disappear by 2033 as they fully migrated to digital versions, adding that the consequences of this for local papers was particularly worrying given their small scale (Slattery, 2023). A March 2023 report prepared for Coimisiún na Meán by Oliver & Olbaum supported the view that commercial radio was continuing to recover but the Commission also noted that growth is not consistent across the sector but is rather concentrated in in the national and regional radio markets. Meanwhile, smaller, independent, local radio services that are not part of a larger radio group have had a much slower recoveries.

In **Editorial independence from commercial and owners influence**, the risk (57%) remains at the upper end of the medium risk range though down slightly from 60% in 2022. It remains the case that there are few formal protections guaranteeing journalistic independence from ownership influence either in law or in the operation of self-regulatory codes within media institutions. The statement in section 2.3 of the Press Council of Ireland code that readers are entitled to expect that content has not been inappropriately influenced by undisclosed interests acknowledges the importance of journalistic independence but this falls short of a legally enforceable standard. Indeed there are a variety of other codes from the National Union of Journalists and Coimisiún na Meán which stipulate that journalists should not be influenced by commercial interests (including, presumably, owners). Taken together these measures constitute a strong admonition against allowing external commercial influences to shape the content of Irish news organisations and, for the most part, this does appear to have been internalised as a professional norm by the vast majority of Irish journalists.

However, the existence of some exceptions to this came to public attention during 2023 in the wake of controversy around payments to RTE staff in particular from external sponsors. It emerged that several RTE presenters who also acted as “brand ambassadors” for commercial products (notionally in a private capacity) were found to have conducted promotional activities while on the broadcaster’s premises.

There is also the question of the editorial implications of the cross-ownership of media and non-media activities. As of 2023, property listing websites in Australia and the US constitute some of News Corporation’s most valuable assets. Another player active in the Irish market, DMG Media directly runs an estate agent subsidiary in the UK. And closer to home, TheJournal.ie is owned by the founders DAFT.ie (Dublin Area Flats and Tenancies), The Irish Times Designated Activity Company owns Myhome.ie (the largest online property listings platform in the country) whilst 2023 saw Mediahuis acquire the largest dedicated second-hand automobile listings website in Ireland, Carzone.ie. The extent to which readers are aware of such cross-ownership and what (if any) the consequences of this may be is not clear. It is evident, however, in for example the online property sections of the Irish Times and TheJournal.ie, that editorial content is driving traffic to a notionally separate commercial operation.

Focus on the digital environment

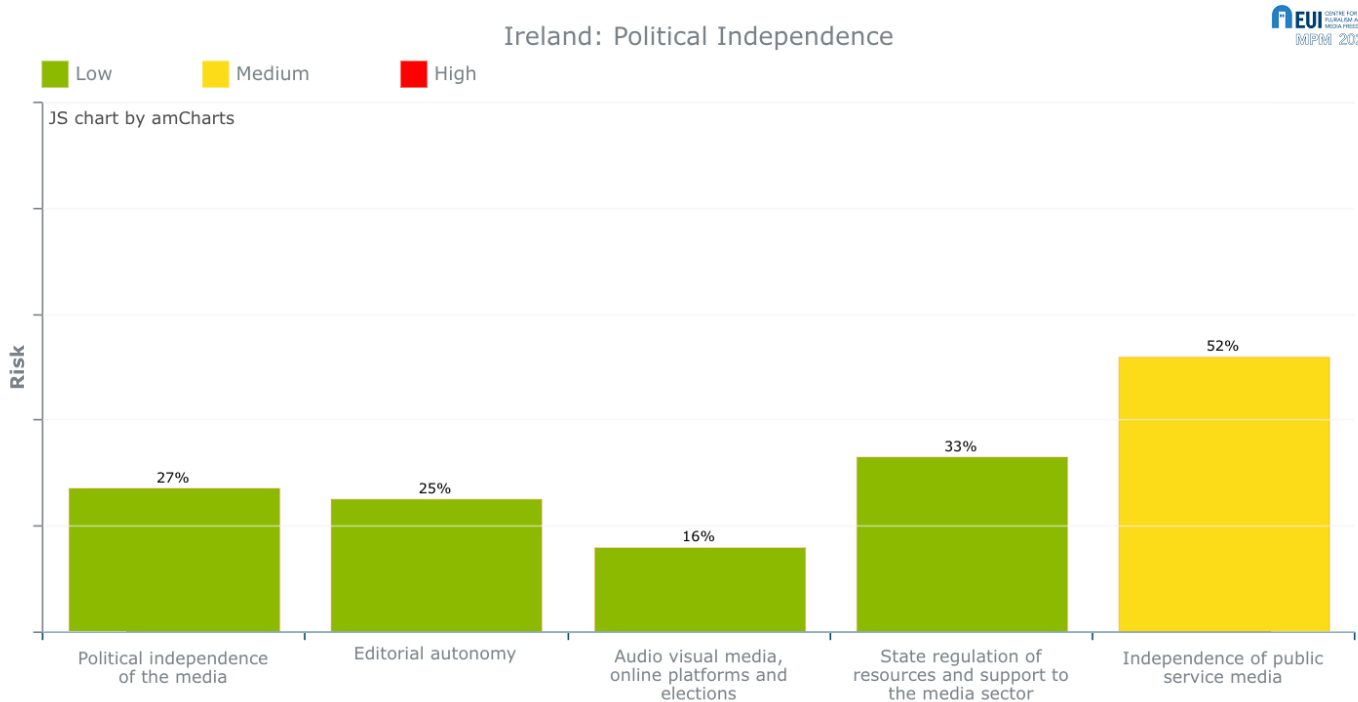
The **Plurality in Digital Markets** indicator was coded as a high risk at 72% (although this marks a drop of 9 percentage points on the 81% figure from 2022). That digital markets are highly concentrated is self-evident and they are characterised by a similar concerns as legacy media markets: the absence of obligations to identify their beneficial owners, of defined upper limits on shares online advertising market or reliable data on the revenue/audience market share of the largest players. However, we would also highlight a concern about how, even if such data were available, shares of digital markets might be conceptualised. There does not appear to be any consensus in Ireland as to which digital audience measurement system is most appropriate. Furthermore, although online platforms gather incredibly granular data about their users on a historically unprecedented level, it is arguable that the kind of metrics that might inform some calculation of their share of digital markets are simply irrelevant for them. This raises a profoundly challenging question about how Irish (and European) regulators can or should attempt to measure the share of influence enjoyed by such platforms.

We have noted digital markets are not entirely unregulated in Ireland: they could hardly be left entirely alone given the number of tech giants which has chosen to locate their European headquarters in Ireland. However, though the Irish Data Protection Commission work can hardly be regarded as insignificant – it has imposed financial penalties worth nearly €3bn between 2018 and the end of 2023 – its role in specifically promoting pluralism in digital markets has been limited to date. In theory then, responsibility for this area lies primarily with the Competition and Consumer Protection Commission. However, the CCPC's focus as a regulator is at the point of a merger or acquisition occurring. It doesn't appear to be applicable to firms which grow market share organically. And there is little evidence that either the CCPC or the Department of Media - have conducted in-depth research on the impact on the news media environment of the dominance of a handful of international tech giants. (The BAI/Coimisiún na Meán has long supported Irish research on the digital news environment conducted via the annual Reuters report. However, it's not clear how (or whether) such research feeds in any market/regulatory/policy interventions.)

It is also apparent that aside from Google's News Showcase the transposition of the European Copyright Directive into Irish law has not led to the hoped-for financial boon for content creators (including legacy media outlets). It appears that online platforms retain considerable liberty to impose their Terms onto content creators.

3.3. Political Independence (31% - low 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.



For the most part there is little change between 2022 and 2023 in the risk associated with regard to Political Independence. The area remains a low risk (31%). However, State regulation of resources and support to the media sector indicator remains a on the cusp of a medium risk whilst the risk associated with the Independence of public service media has increased from 40% in 2022 to 52% in 2023.

The low (27%) risk for the **Political Independence of Media** indicator reflects the fact that there is little-to-no evidence of political control over any significant media outlets (although such control is not explicitly prohibited by legislation). Sinn Féin's An Phoblacht is the closest thing to a newspaper (and indeed was a printed publication for decades) but, as of 2023 its content is more akin to an online political blog. The last *major* politically-connected media outlet – the Irish Press group which was established and owned by members of the Fianna Fáil political party – ceased publication in 1995.

This state of affairs is echoed in the low risk (25%) accorded to the **Editorial Autonomy** indicator. Again, despite the absence of regulatory safeguards aimed at guaranteeing autonomy from political interference in the appointment of senior editorial staff in public and private media, there is no compelling evidence to suggest that Irish politicians have – at least in the 21st century – sought to exercise such influence. Furthermore, all of the major news media adhere to self-regulatory measures stipulating the importance of editorial independence from political interference.

The risk relating to **Audio visual media, online platforms and elections** is also considered low (16%) notwithstanding some concerns regarding the transparency of political advertising online (see below). Both the 2009 Broadcasting Act and Coimisiún na Meán codes place significant stress on the need for fairness, objectivity and impartiality in news and current affairs programming. There is no absolute legal requirement for the PSM (or indeed private broadcasters) to offer political parties airtime during elections. However, in practice such access (via news and current affairs shows) has been taken for granted since the 1960s. Despite sporadic criticism of bias in RTE's core news and editorial comment from both the political left and right, the PSM appears to actively strive to accommodate a multiplicity of political perspectives and to identify criteria for distinguishing perspectives which reflect prevailing currents of opinion from more marginal, sectoral interests. Broadly speaking there is agreement that political actors and parties do receive fair representation across PSM and private media. Furthermore, that there is a complete bar on broadcast political advertising obviates the possibility that political actors with deep pockets might simply spend their way to influence over broadcast audiences).

That the risk associated with **State regulation of resources and support to the media sector** remains at 33% largely relates to the absence of clear rules on the distribution of state advertising. Although direct state subsidies have not previously been a feature of the Irish media landscape, this will change from 2024 in line with a recommendation in the Report of the Future of Media Commission. The Commission suggested re-purposing the Sound and Vision fund (which the formerly Broadcasting Authority of Ireland had disbursed to support non-news and current affairs public service content production) as a broader Media Fund to support public interest media activities such coverage of local democracy and court activity on a platform neutral basis. The recommendation was accepted and - at time of writing - Coimisiún na Meán is consulting with relevant stakeholders on how such a scheme might be optimised. Another recommendation of the Future of Media Commission Report has already led to the introduction of via the November 2022 decision of the Minister for Finance to remove of VAT on print/digital newspapers. Given that the measure applies all and any such outlets there is no scope for discriminatory/favourable treatment of individual media outlets in this regard.

However, we have repeatedly stated in previous iterations of the Monitor, there is very little clarity regarding the distribution of state advertising in Ireland. Although there is an open (and heavily rule-bound) tender process to win the right to place print advertisements on behalf of Irish public bodies, once that tender has been won, the rules on the placement of individual advertisements are completely unclear. In practice it appears that individual public bodies can determine where ads are placed but there are no obvious publicly available rules on how this process operates. Furthermore information on how much state advertising is dispersed to individual media outlets is not routinely collated or made publicly available. In 2023 we sought to interview the agency charged with placing state advertising but were advised that this work is bound by confidentiality and that the agency would require client permission before they could discuss the subject. There is no obvious reason to think that evidence the Irish state (or any of its institutions) routinely seek to “strategically” deploy advertising funding in a manner designed to secure favourable editorial coverage. However, in the absence of any information around this subject, neither can we state with confidence that this does not occur. Figures from Nielsen suggest that, in 2020 and 2021 (during Covid) the Irish Health Service Executive was one of the top ten biggest advertisers in the country. The same source suggests that even in 2023, Government, Social, and Political Organisations cumulatively constitute the third largest category of advertising spend in Ireland. Given this the lack of clarity surrounding how this monies are distributed is increasingly problematic.

At a 52% medium risk, the **Independence of public service media** rates as the highest risk indicator within the Political Independence area. That the serving Minister for Communications plays a key role in appointing the boards for both PSM institutions and that Ministerial Approval is required before a Director-General is appointed for either clearly demonstrates scope for political interference. In practice, the involvement of the Public Appointments Service offers some assurance that objectives procedures and criteria are brought to bear on the appointment process. However, there is no legal requirement to involve the PAS and it appears that the most recent chairperson of the RTE board (in March 2024) was appointed outside the PAS process (O'Connell, 2024). Against that it should be acknowledged that political involvement ceases at the point of appointment and there is no sense that Irish governments have sought to inappropriately influence PSM output (at least not in recent decades).

However, the scale and manner of PSM funding has never been more problematic than in 2023. RTE permanent post-2008 financial crisis was exacerbated by a controversy surrounding the remuneration of its highest profile presenter (who has since parted company with the broadcaster). The (still ongoing) controversy focused attention on RTE's still unusually high - in comparison with other European Broadcasting Union members - reliance on commercial income (mainly advertising and sponsorship). Despite the fact that the 2008 economic crash and intensified competition from online advertisers has seen RTE's commercial income fall by nearly €100m between 2008 and 2022, 44% of the station's income still comes from commercial sources. Furthermore, RTE's *public* income, drawn from a television ownership licence fee has also declined in this period. Despite a sequence of public and private reports (including the Future of Media Commission) and a parliamentary committee concluding that the licence fee is not fit for the purpose of funding 21st century public service media successive governments have refused to replace it with a more appropriate and sustainable model. In 2023, public ire at the perception that RTE had been less than transparent regarding its finances found expression in a mass refusal to renew licence fee payments (Deegan, 2023). In consequence the Department of Media was forced to step in with additional funding to make up the shortfall in licence fee receipts to ensure that RTE did not face bankruptcy. At one level, it is positive that the state has done so as it constitutes a recognition of the key role played by the PSM in the operation of the public sphere. However, this also means that RTE is now directly reliant on ad hoc state largesse which increases the risk that the state's *potential* influence with regard to RTE is increased.

Focus on the digital environment

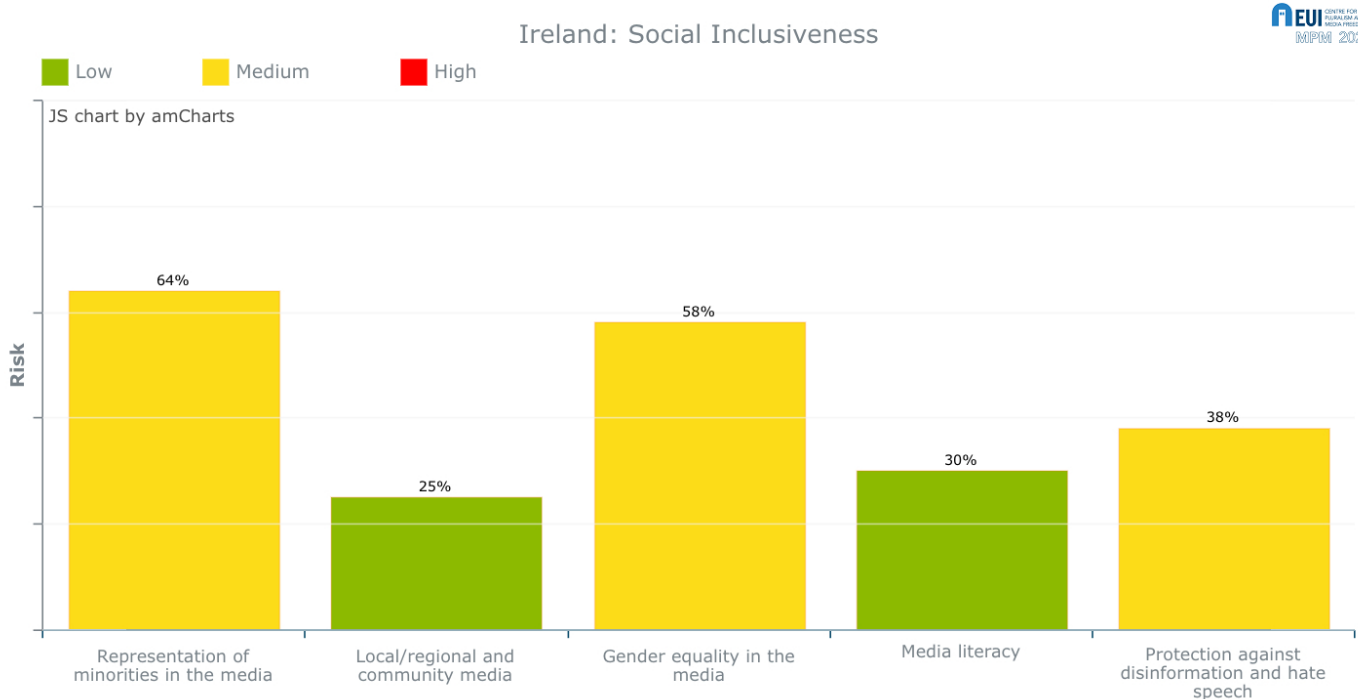
The Political Independence area scores a medium-risk of 36% in the digital environment, compared to the 31% overall low-risk for the area.

Concern has been repeatedly expressed that, the absence of any bar on non-broadcast political advertising, means that online media in particular might be used by political actors (especially those from outside Ireland) to influence public opinion in a less than transparent fashion. Concern that this was occurring during the 2018 referendum campaign saw some online platforms simply suspend all referendum-related advertising. Parts 4 and 5 of the 2022 Electoral Reform Act obliged online platforms to identify the purchasers of any political advertising and to notify the Electoral Commission of any disinformation published on its platform. However, the European Commission expressed the view that Articles 4 and 5 were incompatible with articles 14(1) and 15(1) of the E-Commerce Directive. The Irish Government in turn issued a confidential response to the European Commission on the matter notionally detailing all actions the Government would take to resolve the issues raised by the Commission. To date, however, no further progress has been made on the matter and Articles 4 and 5 of the 2022 act have still to be commenced.

This is more than an abstract concern. The Irish Standards in Public Office Commission (SIPO) requires that political candidates to file detailed expense returns in the wake of each election including reports detailing party expenditure on individual election campaigns. This should permit identification of expenditure on social media campaigns at a "granular" level (i.e. by candidate) and of expenditure on social media campaigns across parties. However, Irish political parties routinely fail to disaggregate their expenditure on social media campaigns and are less than actively transparent about the techniques applied in the course of those social media campaigns. It is possible that this lack of transparency stems less from a desire to disguise "problematic" expenditures and techniques and more from an unwillingness to undertake the administrative burden imposed by providing such data. Nonetheless, for now it remains the case that there is little transparency surrounding online political advertising. Again, this is not an abstract concern: there was a major referendum held in Ireland in March 2024 and a general election has to be called before the end of March 2025.

3.4. Social Inclusiveness (43% - medium risk)

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



The Social Inclusiveness area remains a medium risk of 43% in 2023.

The 2023 score for the **Representation of minorities in the media** indicator is 64%, up 10% on the 2022 figure and now approaching the high risk category. Part of the issue is the ongoing absence of any definition in Irish law of what constitutes a minority: it is, by definition, harder to introduce progressive measures for a category which has no legal status and thus there are no legally recognised minorities. That said, it is clear that, aside from Irish-language speakers, minorities are not well-served on either the PSM or private broadcasters. This research is not aware of any programming on national stations dedicated to addressing minority audiences defined along ethnic, religious, disability or sexual orientation lines. There is growing awareness of the absences in the access of and representation of minorities and both the PSM and private channels have committed to adopting “mainstreaming” approaches, that is, including minority identities within “normal” content rather than risking ghetto-ising them by creating separate programming strands. How successful these efforts have been in improving minority access to airtime ever is impossible to state in the absence of published data collection on the subject from either the PSM or private media on the characteristics of both in-house staff and programme. In this regard, it telling that RTE’s Diversity Strategy which covered the period up to 2022 was not updated in 2023. Similarly and the private commercial television operator does not appear to have renewed its “Virgin Media Discovers” strand, the one overt content-based nod to diversity it had previously supported.

With regard to people with disabilities, Access Rules relating to subtitling, Irish sign language (ISL) and audio description (AD) appear to be generally adhered to. However, although subtitling is widespread, it is much harder to find ISL and AD content. In the absence of published data, we conducted our own snapshot survey of ISL-ed content and although RTE can reasonably claim to make at least some ISL content

available every day of the week, our survey suggested a less active embrace of ISL by the commercial television station, Virgin Media (reflecting the less onerous regulatory obligations imposed upon the station). Similarly the Audio Description Rules contained in the Broadcasting Authority of Ireland's 2020 code place relatively low obligations on Irish broadcasters and there is no evidence that these obligations are being surpassed. The PSM, RTÉ was mandated to add AD to just 9% of shows in 2022 while Virgin Media faced much lower (4%) obligations.

At 25%, the risk associated with the **Local/regional and community media** remains low. This primarily reflects the fact that local and community media are a well-established feature of the Irish media ecology: even the PSM RTE maintains eight regional offices (with associated correspondents) broadly covering the entire island of Ireland. That said, local media also face unprecedented financial challenges. Paucity of funding has long been a feature of the environment in which community radio stations have operated (although recent years have seen more consistent efforts from the broadcast regulator to institute more sustainable funding mechanisms). However, the local print and broadcast media appear to be operating in increasingly precarious financial conditions. The representative body for Local newspapers has noted how 16 paid-for local papers ceased operating in the decade up to 2021. Although the local radio sector has not seen similar closures there is an increasing degree of concentration (as indeed there is in the local newspaper sector) which is clearly informed by the need to find economies of scale. These economic challenges have been cited by the industry as making it increasingly difficult to provide even routine coverage of subjects like local council activities and court cases. Notably, both forms of content have been earmarked for supported in a forthcoming scheme to be administered by Coimisiún na Meán.

With regard to **Gender Equality in the Media** the 58% score in 2023 (up from 48% in 2021) remains firmly in the medium risk category. RTÉ's Diversity and Inclusion Strategy has, since 2018, included gender as a marker of diversity but, as noted above, the Strategy technically lapsed in 2022 and has not been revisited. More positively the Irish language PSM, TG4 has introduced a Diversity, Equality and Inclusion strategy. This entails measuring concrete DEI metrics (identifying how the relative presence absence of women by Department, seniority, pay scales etc.) In terms of senior positions within broadcasters, 2023 proved mixed: between June 2023 and February 2024, the two women occupying the role of Director-General and Chairperson at RTE were both replaced by men. By contrast Virgin Media Television appointed their first female MD in October 2023. Beyond this there remains a degree of opacity regarding the gender make-up within the senior management of both RTE and Virgin Media. This reflects a wider information deficit. In December 2022 the Joint Oireachtas (Parliamentary) Committee on Gender Equality published a report detailing recommendations on promoting gender equality across Irish society. These included a requirement whereby broadcast media should publish diversity and gender disaggregated data for all programmes including contributors and directly employed presenters. The data should include some qualitative analysis of the manner in which women were deployed/represented in such programming. It *appears* that the new media regulator Coimisiún na Meán intends to formalise this in a new EDI policy in 2024 but with regard to 2023 the data remains unavailable.

The 30% score for **Media Literacy** in 2023 remains unchanged from 2022 keeping this indicator in a low risk category. Media literacy remains feature to the Irish education curriculum although it remains a concern that it is a) often conceptualised as mainly concerned with digital media literacy (rather than a wider conception) and b) reflecting what has been characterised as "curriculum overload" is still not a compulsory element of secondary education in Ireland. even if it is not always formally assessed and often depends upon the initiative of individual teachers and principals in promoting the subject.

Though a core strand of the Science and Social Personal and Health (SPHE) element of the primary school curriculum since 2000, there remains no separate Media Literacy curriculum at secondary level (where it *may* be encountered through the study of: English; Civic, Social and Political Education (CSPE) or; Environmental and Social Studies (ESS) in an incidental rather than integral manner). This “incidental” approach is reflected in the absence of stand-alone, media-specific training embedded in formal teacher-training in Ireland.

Indeed there is arguably far more activity in non-formal education, especially those projects facilitated by the Coimisiun na Meán-supported Media Literacy Ireland (MLI) network.

The score for the **Protection against disinformation and hate speech** indicator has fallen again in 2023 – to 38%. This in no small part reflects the establishment in March 2023 of the National Counter-Disinformation Strategy Group. Constituted by representatives from a variety of government departments (and, in particular the Department of Media) along with representatives from EDMO Ireland, Technology Ireland, the Irish Council for Civil Liberties, the Press Council, Coimisiún na Meán/the Media Commission, the Library Association of Ireland and the National Youth Council of Ireland, its activities in 2023 are best summarised as information-gathering and the scoping out of principles to inform an anti-disinformation strategy. However, its establishment marks a first step towards devising coherent and comprehensive disinformation strategies.

There are some fact-checking initiatives in Ireland. TheJournal.ie runs a Fact-Check feature supported by Meta Ireland and the local EDMO Hub. In addition the Health Research Board in association with the Cochrane Ireland, University College Galway and the Northern Ireland Public Health Agency operates <https://ihealthfacts.ie/> which specifically fact-checks medical-related claims. There is also an increasing body of research on disinformation activities in Ireland. Researchers at the Irish EDMO Hub have produced work tracking the spread of far right memes relating to immigration and the London-based Institute for Strategic Dialogue has also produced some very interesting work in this regard.

However this activity depends on funding sources which could be more stable. The European Commission percentage contribution to the EDMO Hub appears to have declined (from 75% funding to 50% match funding) making it harder to retain the kind of staff who might engage in disinformation monitoring on a more routine basis. Similarly the work of Institute for Strategic Dialogue relies on support from the European Media and Information Fund (EMIF) which is granted on a project-by-project basis.

The state has also made efforts to counter hate speech through legislation. The Criminal Justice Act (Incitement to Violence or Hatred and Hate Offences) bill was passed by the lower house of the Irish Parliament in summer 2023 and is currently before the upper house. The bill makes it a specific criminal offence to commit a hate crime based on the colour of a person’s skin, sexual orientation or their gender, including gender expression or identity. Other new “protected characteristics” include the victim’s race, nationality, religion, ethnic and national origin, and any disability. However, the legislation has been subjected to complaints – for the most part, though not exclusively from socially conservative groups - that it threatens freedom of speech because it criminalises the public communication material “likely to incite violence or hatred against a person or a group of persons on account of their protected characteristics”. The progress of the bill through Parliament has been very slow and it remains unclear as to whether the legislation will be passed in the lifetime of this parliament.

Focus on the digital environment

According to Eurostat figures from 2021 onwards, Ireland has one of the widest spreads of basic literacy skills (by one measure “Individuals with basic or above basic information and digital literacy skills” the highest) in the EU. As noted above, efforts to counter online disinformation and hate speech remain nascent but the commencement of the National Counter-Disinformation Strategy Group and the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill do constitute concrete measures to counter the socially deleterious impact of such speech. The context in which such counter-measures are being put in place is rapidly changing however and it is not clear to what extent there is coordination across state agencies in this regard. For example, the Dublin Riots of November 2023 were overtly driven by disinformation communicated online. There remains some dispute as to how some social media platforms responded the requests from law enforcement agencies to remove disinformation.

4. Conclusions

Overall in 2023, Ireland remains at the lower end of the risks to media pluralism spectrum with the European Union. Again, however, there remain a number of areas where protections for pluralism and diversity could be enhanced.

The risk to **Fundamental Protection** increased slightly in 2023, largely due to a change in the method used to calculate broadband access in Ireland. As such there have not been substantial changes to the other risk indicators in this area. Indeed, with the establishment of the new media regulator, Coimisiún na Meán, the already low scope for political interference in the regulatory process has been further reduced, reflected in a 5% score under the **Independence and effectiveness of the media authority** indicator. Notwithstanding assertions regarding the potential impact of the Criminal Justice (Incitement to Violence of Hatred and Hate Offences) Bill on freedom of expression, the main issue here remains the lack of clarity regarding the conditions imposed upon that liberty in the Constitution.

The **Protection of the right to information** remains a medium risk at 42% driven by concern that the Freedom of Information mechanism remains under-resourced in many state institutions. Against this, recent case law appears to have strengthened the legal footing on which Freedom of Information requests can be made. The entry into formal operation of the Protected Disclosures (Amendment) Act in January 2023 extends - the already quite strong - whistleblower protection in Irish law to cover a range of private sector organisations.

That the medium risk 35% score for the **Journalistic profession, standards, and protection** remained unchanged since 2022 reflects the fact that although journalists appear to be increasingly subject to harassment or abuse from members of the public in the course of their duties, this rarely results in physical harm. Furthermore the decision to include anti-SLAPP provisions in the draft version of a new Defamation Act in 2023 is welcome.

Recommendations:

- **Given the concern regarding Freedom of Speech occasioned by the Criminal Justice Act, there is an even greater incentive to re-examine the constitutional provisions relating to freedom of expression;**
- **the resourcing of the Freedom of Information function in state institutions and especially outside central government departments should be enhanced as a matter of urgency;**
- **the Defamation bill should be progressed through the Houses of the Oireachtas to ensure that it is passed within the lifetime of the current parliament.**

Market Plurality remains the single highest risk area in the Monitor for Ireland at 71% in 2023. Significant strides have been made in public knowledge regarding media ownership via the Coimisiún na Meán-supported Mediaownership.ie and the new Media Ownership Monitor Ireland resource. Those resources make it clear that the “natural” tendencies towards concentration which characterise media markets (in order to exploit economies of scale and scope) have resulted in a local media market which, by any standards, is highly concentrated. There may be innate limits to the degree of competition which is feasible in a small

market like Ireland, limits which are not amenable to regulatory influence. Nonetheless is it important that media regulators have access to comprehensive data regarding the economics of the Irish media market so they can understand the challenges to media viability and draw up policies accordingly. It is precisely financial pressures which appear to have encouraged RTÉ at a senior management level and some presenters to engage in commercial activities which, on the face of it, are not compatible with their status as Public Service Media. Understanding the financial contribution of non-media activities to the revenues of media firms would also inform how the public interpret editorial content.

Recommendations:

- **The government should explore the introduction of minor legislative amendments to the 2014 Competition and Consumer Protection to 1) introduce a requirement for media firms to publicly disclose their ultimate owners and 2) to declare their annual revenues and 3) quantitative guidance on media market share upper limits;**
- **Coimisiún na Meán should consider funding research into the financial viability of – in particular – local media outlets to better inform their understanding of threats to sectoral sustainability.**
- **The Competition and Consumer Protection Act explicitly acknowledges that the operation of PSM constitutes a defence against the risks to plurality posed by media market concentration. Given this, and the reality of the concentrated nature of Irish media markets, it is doubly important that the PSM funding issues discussed elsewhere in this report are speedily and comprehensively addressed.**

The risk in the **Political Independence** area, though slightly up on 2022, remains low in 2023 at 31%. Broadly speaking it can be said that the PSM makes some effort to ensure that a multiplicity of political perspectives are represented. Irish media are entirely separate from political parties in terms of ownership and there is no compelling evidence that Irish politicians have sought to exercise any influence in the appointment of senior editorial staff in public and private media. The decision to directly fund news content provision relating to local democracy and court activity via Coimisiún na Meán does not appear to pose any threat to the independence of journalism, not least because it effectively simply expands existing supports to content production offered via the Sound and Vision fund.

Against this, the absolute lack of clarity over how much State advertising is placed with individual media outlets or media groups and on what basis remains intensely problematic, not least because figures from Nielsen suggest that state advertising as a bloc is the third largest category of ad spend in the country.

However, the single largest risk indicator in the political area remains that relating to independence of public media. This is not to suggest that the state is actively intervening (or seeking to intervene) in the editorial content of the PSM. However, the state does determine the level of public funding available to the PSM by dint of the fact that it determines which mechanism is used to collect that funding. And the level of overall funding clearly determines the parameters within which the PSM can operate.

The nature of funding matters too. The extent to which the Irish PSM has relied on commercial revenues has been an outlier by European standards since the 1960s. Even if, the post-2008 contraction of the Irish

economy saw RTÉ's commercial funding fall to 45% of its total revenues this is still more than twice the average commercial contribution across European Broadcasting Union members. This is reflected in RTÉ's quasi-commercial outlook, the implications of which have been put on public display throughout 2023 and into 2024.

Public reluctance to continue paying the broadcast licence fee in the wake of controversies surrounding RTÉ's finances mean that the broadcaster is now directly reliant on ad hoc payments from the state to remain financially viable. Though there is no suggestion that the state is using this for political leverage (i.e. to secure favourable coverage), the dependency relationship creates a risk that this could occur. Clearly this state of affairs should not be allowed to persist.

Recommendation:

- **As a matter of critical urgency the state should replace the broadcast licence fee and place the funding of the PSM on a sustainable, objective basis which actively considers the informational needs of Ireland in the 21st century;**
- **The new funding mechanism should be designed to limit the scope for political discretion as to the precise level of funding directed to the PSM;**
- **The agency (or agencies) employed by the state to place advertising on behalf of government departments and other state agencies should be required to submit the Minister for Media an annual report detailing advertising expenditures by a) department/institution b) medium and c) media outlet.**

The **Social Inclusiveness area** remains a medium risk (43%) in 2023. Until fairly recently the study of media was considered a “fun” (and by implication trivial) subject at third level in Ireland. However, the recent identification of the mediated spread of disinformation and hate speech as profoundly undermining the operation of liberal democracy in Ireland and undermining any adherence to a social contract demonstrates that media and information ecologies are being taken more seriously in Irish public and political discourse. This is exemplified by the positive steps to establish the National Counter-Disinformation Strategy Group and efforts to progress the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill through the Irish parliament. Similarly Media Literacy Ireland's support of media literacy activities outside formal education can potentially contribute to a wider public capacity to distinguish between reliable and unreliable information, especially in the online space. It remains disappointing, however, that media literacy is not more embedded into the Irish secondary school curriculum, however.

It is also the case that in the broader media sphere, there is huge scope to improve the extent and manner of representation of woman and minority groups. Efforts towards mainstreaming such groups are well-intentioned but in the absence of published data on the extent of such efforts it is impossible to benchmark any progress in this regard. Community media in particular have played a role in providing space for minority groups but while their position in the broadcasting firmament is well-established they remain financially precarious.

Recommendations:

- **Coimisiún na Meán should require broadcasters licenced by it to submit annual Equality, Diversity and Inclusion audits detailing the extent to which minority groups (categorised by gender, ethnicity, disability and possibly other categories) feature in programming, the subject areas they are associated with and the nature of their contribution;**
- **Coimisiún na Meán to consider the establishment of a permanent fund targeting at last “subsistence level” support for community broadcasting;**
- **The Minister for Education to consider the introduction of media literacy as a compulsory element of the secondary school curriculum.**

5. References

- AGB Nielsen Media Research (2024), Channel Share of Viewing 2023, Accessed at https://www.medialive.ie/index.php?option=com_content&view=article&id=1086:channel-share-of-viewing-2020&catid=93&Itemid=349 2 March 2024.
- Michael Bolton (2024), “Number of houses built in 2023 increased by 10% - CSO”, Breakingnews.ie 25 January 2024. Accessed at <https://www.breakingnews.ie/ireland/number-of-houses-built-in-2023-increased-by-10-cso-1579756.html> 14 February 2024.
- Broadcasting Authority of Ireland (2018), Ownership and Control Policy, (Dublin: BAI).
- Broadcasting Authority of Ireland (2020), Access Rules, (Dublin: BAI).
- Central Statistics Office (2024a), Census of Population 2022 - Summary Results, Accessed at <https://www.cso.ie/en/statistics/population/censusofpopulation2022/censusofpopulation2022-summaryresults/> February 26 2024, (Dublin: CSO).
- Central Statistics Office (2024b), Consumer Price Index March 2024, Accessed at <https://www.cso.ie/en/releasesandpublications/ep/p-cpi/consumerpriceindexmarch2024/> February 26 2024, (Dublin: CSO).
- Central Statistics Office (2024c), Monthly Unemployment February 2024, Accessed at <https://www.cso.ie/en/releasesandpublications/ep/p-mue/monthlyunemploymentfebruary2024/> February 26 2024, (Dublin: CSO).
- Central Statistics Office (2024d), Population and Migration Estimates, April 2023, Accessed at [https://www.cso.ie/en/releasesandpublications/ep/p-pme/populationandmigrationestimatesapril2023/keyfindings/#:~:text=The%20combination%20of%20natural%20increase,Figure%201%20and%20Table%202\).](https://www.cso.ie/en/releasesandpublications/ep/p-pme/populationandmigrationestimatesapril2023/keyfindings/#:~:text=The%20combination%20of%20natural%20increase,Figure%201%20and%20Table%202).) February 26 2024, (Dublin: CSO).
- Constitution Review Group (1996,) Report of the Constitutions Review Group (Dublin: Government of Ireland).
- Core Media (2023), Outlook 23 – Media Market Forecasts for Ireland, (Dublin: Core Media)
- Council of European (1950) European Convention for the Protection of Human Rights and Fundamental Freedoms (Strasbourg: COE)
- Paul Cunningham (2024), “Opinion poll suggests drop in support for Sinn Féin “ RTE.ie, 24 March 2024. Accessed at <https://www.rte.ie/news/politics/2024/0324/1439650-polls-sinn-fein/> 24 March 2024.
- Gordon Deegan (2023), “Licence fee takings down €16.4m since July in wake of RTÉ payments scandal”, *Irish Independent* 20 November 2023.
- Department of Justice (2022), Report of the Review of the 2009 Defamation Act, (Dublin: Government of Ireland).

European Centre for Press and Media Freedom (2023), Mapping Media Freedom 2023, (Leipzig: ECPMF).

The Institute for Future Media, Democracy and Society/Global Media Registry (2024), Media Ownership Monitor Ireland, (Fujo/GMR: Dublin/Frankfurt)

Future of Media Commission (2022), Report of the Future of Media Commission, (Dublin: Government of Ireland).

Caoimhe Gordon (2023), "Virgin Media Television appoints Áine Ní Chaoindealbháin as managing director", *Irish Independent* 20 October 2023.

Government of Ireland (1937/2018), Bunreacht Na HÉireannn (The Irish Constitution), (Dublin: Oifig an tSoláthair/Government of Ireland).

Government of Ireland (2009), Broadcasting Act, (Dublin: Government of Ireland).

Government of Ireland (2022), Communications (Retention of Data) Amendment Act, (Dublin: Government of Ireland).

Government of Ireland (2014), Competition and Consumer Protection Act, (Dublin: Government of Ireland).

Government of Ireland (2022), Criminal Justice (Incitement to Violence of Hatred and Hate Offences) Bill, (Dublin: Government of Ireland).

Government of Ireland (2022), Electoral Reform Act, (Dublin: Government of Ireland).

Government of Ireland (2014), Freedom of Information Act 2014, (Dublin: Government of Ireland).

Government of Ireland (2022), Online Safety and Media Regulation (OSMR) Act, (Dublin: Government of Ireland).

Government of Ireland (2014), Protected Disclosure Act, (Dublin: Government of Ireland).

Government of Ireland (2022) Protected Disclosures (Amendment) Act, (Dublin: Government of Ireland).

Government of Ireland, draft version of a new Defamation Act published in 2023(Dublin: Government of Ireland).

Kitty Holland (2023), "Dublin riots: Gardaí 'surprised' at speed disinformation spread online before disorder, says Harris", *Irish Times* 19 December 2023.

Information Commissioner (2023), Annual Report 2022, (Dublin: Office of the Information Commissioner).

Joint Committee on Gender Equality (2022), Unfinished Democracy: Achieving Gender Equality, (Dublin: Government of Ireland)

Karlin Lillington (2023), "Ireland is not welcoming to whistleblowers. Why?", *Irish Times* November 9 2023.

The Minister for Communications, Energy and Natural Resources v The Information Commissioner [2020] IESC 57 (25 September 2020)

Colleen Murrell, Kirsty Park, David Robbins, Dawn Wheatley (2023), DIGITAL NEWS REPORT IRELAND 2023 (Dublin: DCU Institute for Future Media and Democracy (FuJo), Reuters Institute Oxford, Coimisiún na Meán)

National Counter Disinformation Strategy Working Group (2023), Scoping Paper, (Dublin: Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media)

Aodhan O'Faolain (2023), "Protection of journalistic sources 'integral' to free press, Supreme Court rules", *Irish Times* 22 June 2023

Hugh O'Connell (2024), "Media Minister Catherine Martin bypassed usual competition procedures to appoint new RTÉ chair", *Irish Independent* 7 March 2024.

Press Council of Ireland (2009), Code of Practice, (Dublin: Office of the Press Ombudsman)

PriceWaterhouseCoopers (2023) Global Media Outlook, (London: PWC)

Radio Centre Ireland (2024), "Irish radio enjoyed revenues of €164 million in 2023, up 4% versus 2022", Accessed at <https://www.radiocentreireland.ie/news/irish-radio-enjoyed-revenues-eu164-million-in-2023-up-4--versus-2022>, February 16 2024.

Raidio Telifís Éireann (2018), Diversity and Inclusion in RTÉ: Re-imagined For A New Generation, (Dublin: RTÉ).

Reporters Without Borders (2023), Press Freedom Index, (Paris: RSF)

Laura Slattery (2023) "Daily printed newspapers will disappear within next decade, says Mediahuis Ireland boss" *Irish Times* April 2 2023.

TAM Ireland (2022), "Total Broadcaster Ad Revenue Up In First Half Of 2022", Accessed at <https://www.tamireland.ie/total-TG4> (2023), [broadcaster-ad-revenue-up-in-first-half-of-2022/](https://www.tamireland.ie/broadcaster-ad-revenue-up-in-first-half-of-2022/) January 13 2024. (Dublin: TAM Ireland)

TAM Ireland (2024), TAM Ireland Release 1st Six Months Data From Total Video Panel, Accessed at <https://www.tamireland.ie/tam-ireland-release-1st-six-months-data-from-total-video-panel/>. January 23 2024.

TG4 Annual Report 2022, (Galway: TG4)

UCC v The Information Commissioners[2020] IESC 57

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Roderick</i>	<i>Flynn</i>	<i>Associate Professor</i>	<i>Dublin City University</i>	X

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>Seamus</i>	<i>Dooley</i>	<i>Trade Union Representative for Irish Journalists</i>	<i>National Union of Journalists</i>
<i>Marie</i>	<i>McGonagle</i>	<i>Lecturer/Professor</i>	<i>National University of Ireland, Galway</i>
<i>Ann Marie</i>	<i>Lenihan</i>	<i>Chief Executive Officer</i>	<i>Newsbrands</i>
<i>Dualta</i>	<i>O'Broin</i>	<i>Head of Public Policy</i>	<i>Facebook (Meta) Ireland</i>
<i>Celene</i>	<i>Craig</i>	<i>Broadcasting Commission</i>	<i>Coimisiún na Meán (The Media Commission)</i>
<i>John</i>	<i>Purcell</i>	<i>Chairman/CEO of independent radio station</i>	<i>Independent Broadcasters of Ireland</i>

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