

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: Luxembourg

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Research Project Report

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TABLE OF CONTENTS

1. About the project	4
1.1. Overview of the Project	4
1.2. Methodological notes	4
2. Introduction	6
3. Results of the data collection: Assessment of the risks to media pluralism	8
3.1. Fundamental Protection (20% - low risk)	11
3.2. Market Plurality (66% - medium risk)	16
3.3. Political Independence (43% - medium risk)	20
3.4. Social Inclusiveness (58% - medium risk)	25
4. Conclusions	30
5. Notes	32
6. References	33
Annexe I. Country Team	
Annexe II. Group of Experts	

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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 Luxembourg the CMPF partnered with Dr Raphael Kies and Dr. Stephanie Lukasik (University of Luxembourg), 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

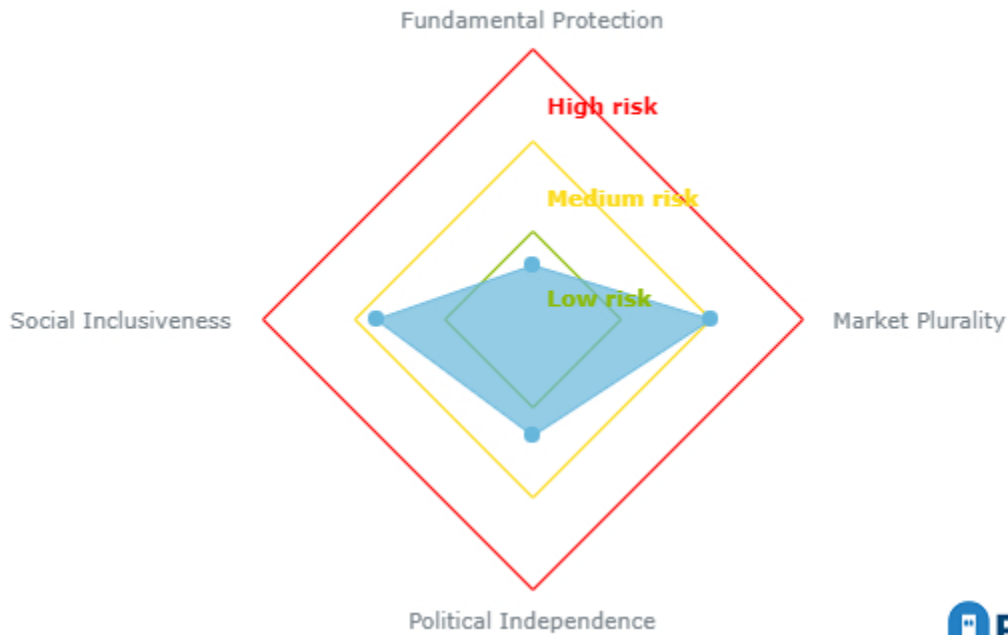
- **Country overview.** With 660,809 inhabitants, Luxembourg is one of the smallest but also richest and most politically stable countries in Europe. The country is largely dependent on a foreign working force (the number of inhabitants being insufficient to cover labour requirements), which explains that there is a persistently high migration rate (47.4% of foreigners on 1st January 2023) and an increasing number of cross-border workers (the number for cross-border workers is not available for 2023, but they were 216,490 on 31 March 2022 and 207 530 in 2021) - from France (53,1%), Germany (23,7%) and Belgium (23,2%). This demographic feature creates political and social challenges not only in terms of social cohesion but also in terms of democratic legitimacy.
- **Languages and minorities.** The linguistic situation in Luxembourg is highly complex and peculiar as it is characterized by the practice and the recognition of three official languages (also referred to as administrative languages): French, German, and the national language Luxembourgish, established by law in 1984. Many other languages are spoken, Portuguese (the largest foreign community) and English (essentially spoken by employees of financial institutions and international organizations). While there are several commercial radio channels targeting this multilingual public (e.g. L'essentiel for the French-speaking community, Radio Latina for the Portuguese-speaking community or Radio ARA for the French, English, Arabic and Italian-speaking communities), the PSM (i.e. Radio 100.7) and RTL - the main commercial radio and television company, that has public service missions - broadcast mainly in Luxembourgish. RTL as however, extended its online multilingual offer by creating an English Radio (RTL Today) and a French and English website (RTL infos and RTL Today).
- **Economic situation.** After a year in 2022 where GDP growth reached +1.4%, Luxembourg has entered recession in 2023, with a negative rate of -0.4%. The inflation rate was 3.5% in 2023. However, Luxembourg's economy should emerge from recession in 2024, with +1.5% growth.
- **Political situation.** Since the Treaty of London of April 19th, 1839, the Grand Duchy of Luxembourg has been an independent sovereign state. Luxembourg is a parliamentary democracy and a constitutional monarchy. Grand Duke Henri is the Head of State and Luc Frieden, the Prime Minister. Regarding legislative procedures, there is the Chamber of Deputies, the government and the Council of State. The Chamber of Deputies is made up of 60 deputies elected by universal suffrage every five years. The Council of State is made up of 21 councilors appointed by the Grand Duke. Luxembourg is a very stable country with strong political parties and powerful trade unions. The Christian-Social People's Party (CSV) has been Luxembourg's largest party at the national level since 1945 and has governed all ruling post-war political coalitions except for the periods from 1974 to 1979 and 2013 to 2023 (two mandates with the electoral coalition composed of the Liberal Party (DP), the Socialist Party (LSAP) and the Green Party (Déi Gréng)). Since the legislative elections of October 2023, the CSV party has returned to power in coalition with the DP.
- **Media market:** The media market in Luxembourg is limited and highly fragmented in linguistic and cultural terms. The media offer is rich compared to its size and the number of inhabitants. The print sector includes four daily newspapers (Luxemburger Wort, Tageblatt, Le Quotidien, Zeitun vun Lëtzebuerger Vollek), one free daily newspaper (l'Essentiel), and several magazines, weeklies, and monthlies. There are several online news media and TV stations, among which only one (RTL) offers a daily programming, but residents also have access to channels from the neighboring countries. The TV market is dominated by RTL, that has "public service missions" but is not a "public service media"

(PSM), in so far as it is primarily a commercial media. There are five private radio stations with national or broad coverage and only one radio broadcaster (Radio 100.7) that is officially recognized as a public service media. Despite the apparent diversity, there is a very large concentration (horizontal and vertical) of the market, since most of the national press belongs to two publishing houses while the radio and television sectors are dominated by one group (CLT-UFA). The country also exercises an important role in the management of international media concessions. Internet coverage is very good across the country.

- **Regulatory environment:** The media regulatory environment in Luxembourg is characterized by a legal framework that includes key institutions and regulations to oversee the media sector. Electronic media in Luxembourg are currently regulated by the Law of 27 July 1991 on electronic media (“Electronic Media Law”). So far, the Electronic Media Law has been amended thirteen times, primarily to incorporate EU directives and without undertaking a global reassessment of the law. Luxembourg has transposed in national law the Audiovisual Media Services Directive (AVMSD) on February 26, 2021. And has voted for the implementation of the Digital service act (DSA) into Luxembourg law on February 15, 2023. The Digital Services Act (DSA) is supervised by the Luxembourg Competition Authority, which is designated as the Digital Services Coordinator (DSC) responsible for monitoring, enforcing, and supervising the DSA at the national level. To modernize and streamline its legislation, the government will organize in cooperation with the University of Luxembourg, several public events aiming at presenting and discussing the main reforms that will be introduced in the media legislation.

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

Luxembourg: Media Pluralism Risk Areas



JS chart by amCharts



Globally, the Luxembourg media landscape, is slightly more at risk compared to last year. **Fundamental Protection** remained at low risk (20%). **Market plurality** increased from low risk to medium (bordering with high) risk (66%), **Political Independence** remained at medium risk (43%) and **Social Inclusiveness** remained at medium risk (58%).

With regards to **Fundamental Protection** area (low risk, 20%), the indicators composing this area score as following: protection of freedom of expression (23%), protection of right to information (17%), journalistic profession, standards and protection (26%), independence and effectiveness of the media authority (18%), universal reach of traditional media and access to the internet (15%). Concerning the freedom of expression, defamation is still considered a potentially criminal offence. We count two cases of defamation leading to court decisions by the end of 2022 but none in 2023. The guarantees for the right to information are insufficient to match the needs of professional journalists both from a legal and practical perspective. The defense of the journalistic profession is essentially based on voluntary work which is inappropriate to properly defend the related interests. Finally, several journalists were victim of offline and/or online threats.

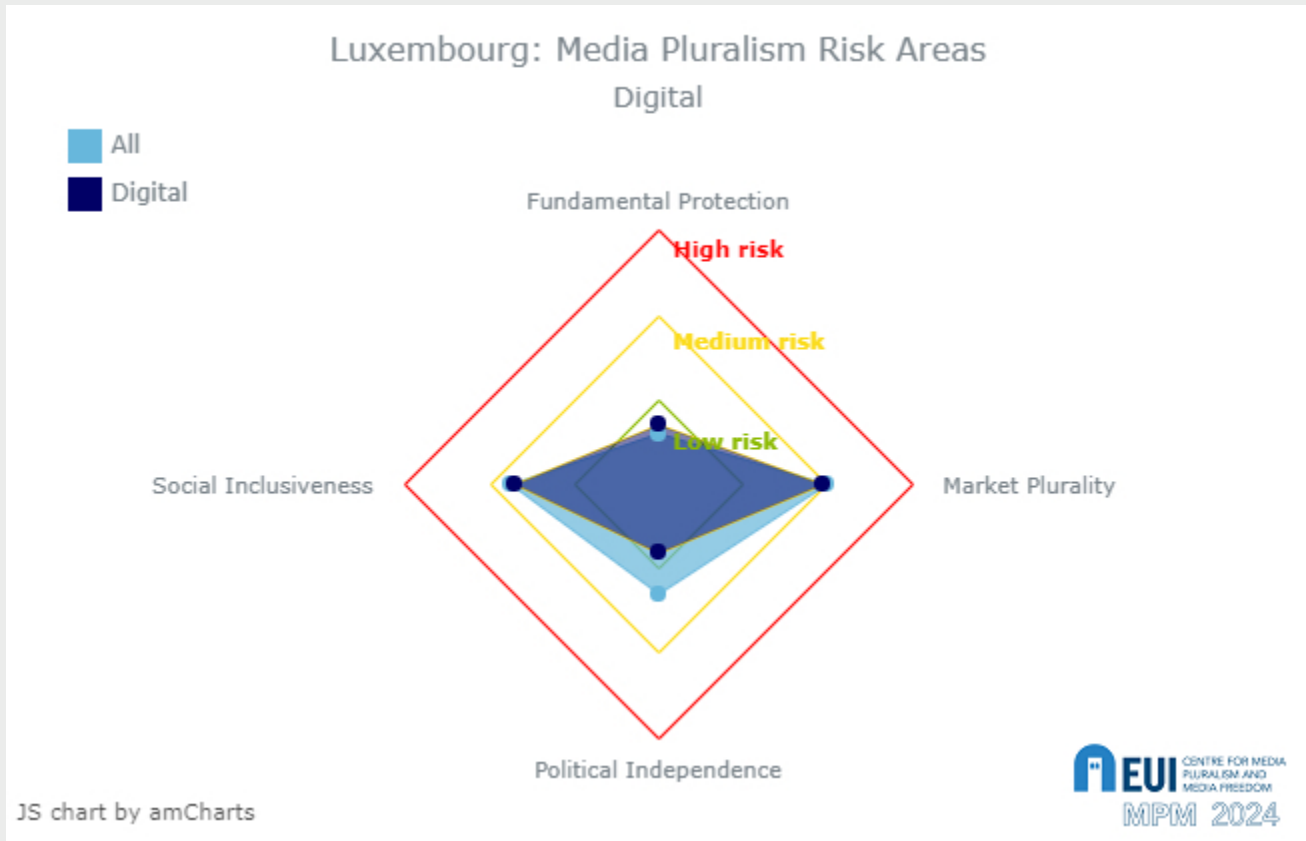
Regarding **Market Plurality** (66%): transparency of media ownership (58%), plurality of media providers (96%), plurality in digital markets (92%), media viability (29%), editorial independence from commercial and owners influence (54%). As in the past, Luxembourg continues to have an ownership structure that is not fully transparent and accessible. The media landscape is highly concentrated offline and online due, in part, to the absence of specific limitations to prevent media concentration. In addition, the existing biannual media pluralism survey, Plurimedia, that measures the media audience share has been abruptly interrupted by its sponsors due to allegedly methodological issues. In parallel, it is also not possible to properly evaluate the evolution of the revenue of the media since these are not public. Besides, there are laws and self-regulation prohibiting advertorials or other forms of disguised advertisement, but they are not fully

implemented.

As far as **Political Independence** is concerned (medium risk, 43%). The area was affected by an increase in the level of risk, depending both on detected 2023 developments and methodological changes. The indicators scoring the highest level of risk in the area are political independence of the media (63%), state regulation of resources and support to media sector (63%), audiovisual media, online platforms and elections (50%), all of these areas present a medium risk level. The remaining two indicators score a low risk: editorial autonomy (25%), and independence of public service media (13%). Political independence of the media presents the following risks: there are no regulatory safeguards to prevent political conflict of interest in the private media sector, even of in practice media are generally independent. Concerning the media and election, several small parties complained about the official coverage of the local and national electoral campaign on PSM (including RTL) which was supervised by the public regulator, ALIA. The electoral supervision however does not include the private and social media, where the political campaign is particularly active and visible. Consequently, there are no reliable data of the electoral coverage by private and social media. In addition, the use of political advertisement is not regulated and not transparent both in offline and online media. Lastly, ALIA does not have the competence to allocate national and international frequencies, and there are no rules concerning the distribution of indirect subsidies state advertising to media outlet.

Social Inclusiveness area is at medium risk (58%). Two areas are particularly concerned by high risk, Representation of minorities in the media (75%) and Gender equality in the media (81%). Media literacy (50%) and Protection against disinformation and hate speech (63%) are considered at medium risk. Whereas local/regional and community media is at low risk (19%). The following weakness were identified for Social Inclusiveness: Linguistic minorities have no proportional access to the PSM (i.e. radio 100.7) and limited access to RTL television that has PSM missions. Similarly, there are no legislation and policies supporting an effective access to media for people with disabilities. Women are largely underrepresented in the leading positions of the largest media outlets of the country. Media literacy is present in formal and informal education but there is room for improvement concerning its coordination and visibility. Finally, there are some cases disinformation but just a limited number of initiatives stemming from civil society form mitigating them. Concerning hate speech, there are no regulatory framework against hate speech online and limited number of initiatives from civil society that specifically aim at countering it.

Focus on the digital environment

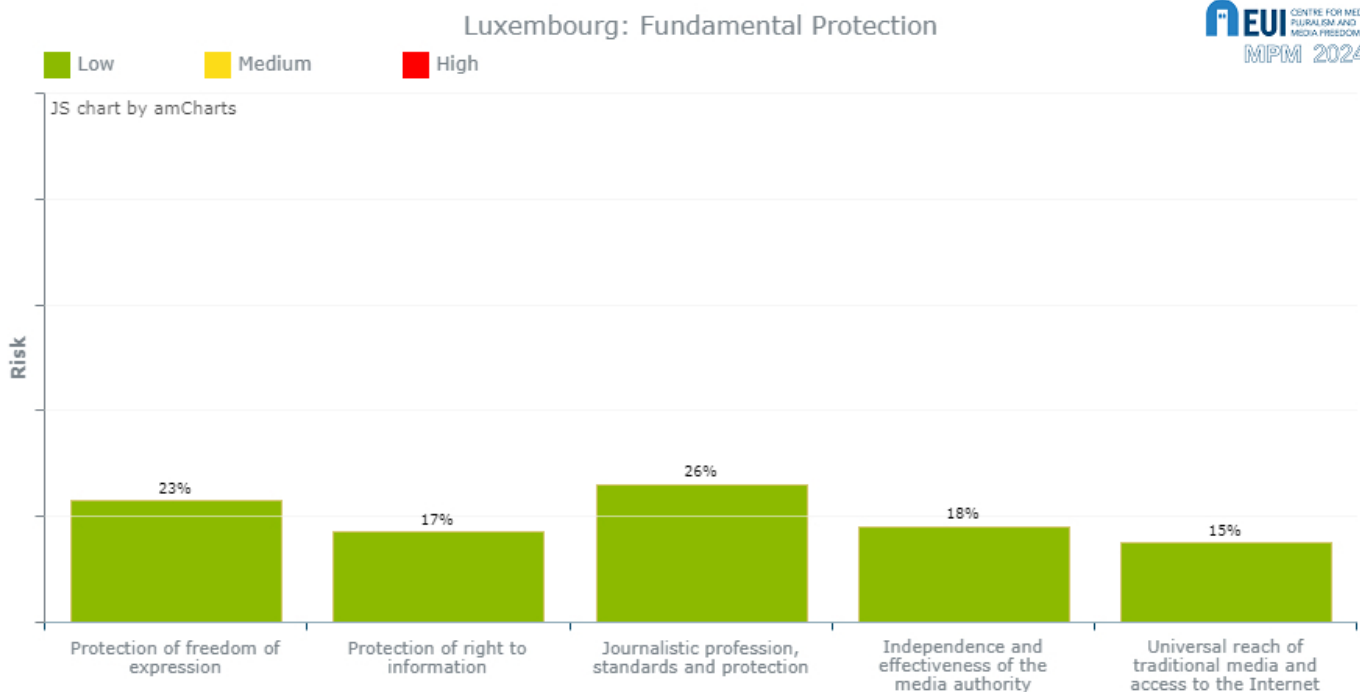


The digital environment scores risk assessment is comparable to the one of the non digital environment. **Fundamental Protection** is at 23% (Low risk), **Market Plurality** is at 65% (Medium risk), and **Social Inclusiveness** scores 58% (Medium risk). The only exception is **Political Independence** with a score of 27% (16% less at risk than the offline counterpart, although issues are detected when it comes to online political advertising).

Globally, the digital media landscape is characterized by an increasing distrust in (social) media due in part to cases of disinformation and by the scarcity of effective regulation and supervision particularly in electoral period. There are signs however this could start changing soon. In February 2023 the Digital Services Act (DSA) has been implemented in national law, with the Competition Authority as national coordinator. Further impetus for improving the regulation of the digital media environment is likely to emerge from to reform the electronic media law planned for the next years.

3.1. Fundamental Protection (20% - 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.



Protection of freedom of expression (23% - low risk)

The indicator of protection of freedom of expression (23%) appears to be stable compared to last year's MPM implementation. Freedom of expression is explicitly recognized in the Constitution and protected by the national law on Freedom of Expression of June 8th, 2004 (amended in 2010). Luxembourg has also signed and ratified important international treaties: the European Court of Human Rights (ECHR) (1953) and the International Covenant on Civil and Political Rights (ICCPR) (1983). The Law on Freedom of Expression of the media (as amended in 2010) does not make the difference between offline and online freedom of expressions as the European Court of European rights. There are, to the best of our knowledge, no cases of filtering, monitoring, blocking, or removing online content in an arbitrary way by the state. It should however be noted that the state or the regulator does not report on filtering and removals of illicit content, implying that is no way for public control to monitor and assess if the content was indeed an illicit content or not.

Defamation is still considered a potentially criminal offence. There was no new case of defamation in 2023, except the case of the former director of the Modern Art Museum, Enrico Lunghi, against two journalists, the former general manager of RTL and the former head of Luxembourg programs at RTL. The affair is still pending seven years after the act. On December 14, 2023, the 7th criminal chamber of the Luxembourg District Court convicted two former RTL journalists for defamation and slander for this affair. They will have to pay a fine of 1,000 euros. The former general manager and the former head of programs were acquitted.

Enrico Lunghi should receive the symbolic euro as a civil party. One of the journalists however declared that he intends to appeal this decision.

Protection of right to information (17% - low risk)

The indicator protection of right to information decreased from scoring medium risk in MPM2023 to low risk (17%) in MPM2024. At present, the Constitution does not mention or protect the right to information and related concepts. Access to administrative documents is guaranteed by article 7 of the Law of 14 September 2018 on transparent and open administration. This law ensures that every natural or legal person has the right to access to documents held by the public authorities. The law is complemented by two ministerial circulars, called Bettel 1 (enacted in January 2016) and Bettel 2 (June 2022) that repeals and replaces that of 2016. The circular indicates how the public administration should respond to demands stemming from the journalists. On July 2023, - five years after the the enforcement of the law on transparent and open administration - the former Bettel government announced its intention to strengthen access to public information for the journalists with the development of a preliminary draft law (resulting from the consultation with the various stakeholders and in particular with the Press Council). During his greetings to the press in January 2024, the new PM, Luc Frieden, declared that he plans to present a bill before the summer aimed at enshrining in legislation the right of access to information for professional journalists. The new law should follow the best practices that exist in certain German Länders or in Switzerland.

The status of whistleblowers has been at the center of many debates in recent years in Luxembourg, due to the Luxleaks affair that is still pending. The European Court of Human Rights ordered Luxembourg on February 14 2023 to pay damages for not having recognized the whistleblower status of Frenchman Raphael Halet and for having convicted him for leaking documents as part of the Luxleaks tax evasion scandal. On May 2023, the EU Whistleblowing Directive has been transposed in national law, conferring a real status on the whistleblower, with clearly defined rights and obligations. concerning wrongdoings relating to EU law, such as tax fraud, money laundering or public procurement offences, product and road safety, environmental protection, public health and consumer and data protection.

Journalistic profession, standards and protection scores (26% - low risk)

In 2023, there have been few cases of offline and/or online threats on journalists and no cases of SLAPP. However, on 9 March 2023, the Investigative Online-platform Reporter.lu reported that it received three letters threatening legal action following a series of articles revealing a fraudulent scheme in the real estate sector. The article shows how the Cenaro Technical Services, which are under investigation for fraud, offered their services to other promoters. To date, no specific SLAPP legislation is implemented in Luxembourg while it would be useful to prevent conspiracy theorists from attacking journalists as was the case in 2021.

The protection of professional standards in Luxembourg is attributed to the Press Council (Conseil de presse), a public law body. It is composed of journalists (50%) and representatives of media companies (50%) designated by ALJP (Association Luxembourgeoise des Journalistes Professionnels) and ALMI (Association Luxembourgeoise des Medias d'information) respectively. The Press Council adopted in 2006 a code of deontology, replacing an earlier version from 1995. Members of the public can introduce complaints regarding press articles or other media reports to the Press Council. These complaints are

handled by a “Commission des plaintes”, presided by an independent jurist. There have been 3 complaints in 2023. The first is a complaint in defamation filled by Berglind Fridriks, the director of Max Planck institute in Luxembourg, against the journalist Gabrielle Antar. It concerns an article published on April 2023 in Luxembourg Times claiming that Berglind Fridriks has morally harassed several employees. The “Commission des plaintes” has rejected the complaint considering that Gabriel Antar has respected the deontology of journalism. The second complaint concerns the electoral coverage of 4 journalists in an article published on June 14 in Luxemburger Wort. The plaintiff criticized how the journalists analyzed the personal scores of the candidates for the municipal elections, one of whom is the complainant's daughter. As the article in question does not directly concern the complainant, the commission has rejected the complaint. The third complaint stems from the Biergerinitiativ Gemeng Wäiswampich asbl against the journalist Nico Muller and the Luxemburger Wort. The complainant felt offended by the comments of the journalist on the classification of the refreshment bar as national cultural heritage. The commission has rejected the complaint estimating that the journalist did not breach ethical and professional standards.

The receipts and spending of the press council are not publicly available. The internal regulation of the press council (art.9) indicates that the receipts are formed by the subsidies granted by the government, through donations and legacies from various sources, as well as, if necessary, by contributions from publishers and professional journalists' organizations. The vice president of the press council informed us that the press council is funded by the gouvernement and has additional (cost covering) income based on the press card fee. There are no donations or legacies, and no contributions from publishers or professional journalists' organizations. The Luxembourg Association of Professional Journalists (ALJP) is also involved in the defense of the journalist interest and the respect of professional standards. It is composed of professional journalists (salaried or freelance) recognized by the Press Council or by an equivalent foreign institution.

The third association that plays a role in the protection of the journalist standards and interests is the "Luxembourg Association of News Media" (ALMI) that in July 2020, replaced the national association of newspaper editors. The press council determines since 2016 the representatives of the publishers by the number of press cards by publisher (see internal rules of the press council). As a result of this procedure, big and small publishers (employing 85% of the professional journalists in Luxembourg) are represented in the press council. These publishers are then eligible to be a member of ALMI (www.almi.lu). It brings together the 12 publishers represented on the press council. While it essentially defends the interests of the editors, they also commit to fight against any attempt to oppose or limit the freedom of expression. A major "raison d'être" of ALMI is the international representation of Luxembourg (e.g. WAN-IFRA).

A recurring problem concerning the professional association of journalists is that they are composed of volunteers, implying that the scope of actions that can be undertaken is highly reliant on individual ability and willingness of the members to sacrifice free time and work time. A situation that can lead to a certain amateurism in the fulfillment of their task. The latter is further limited by the willingness of the employer to accept said off-time which remains a potential barrier to entry for many potential volunteers. This situation can have negative consequences for the quality of work.

A certain professionalisation of those structures, which already exists in the form of a single 75% position (a consultant) in the Press Council, could be desirable. It has expressed its wish to expand this position to 100%.

A second issue that emerged in 2023, concerns the small press editors, representing specialized

publications (such as cooking, sport, culture). Their main demand is the revision of the support mechanism for professional journalism which funding is based on several criteria among which the number of employed professional journalists and the general nature of the coverage of the publications. These criteria currently put small and specialized press editors at a disadvantage to benefit from the State aids. To gain more visibility, they founded a new association of independent publishers, ALEMI.

Concerning the working conditions of journalists, law of July 30, 2021 established an aid scheme for professional journalism aimed to contribute to maintain a fair level of journalistic diversity and safe working conditions. This aid scheme favors the hiring of journalists on fixed-term contracts, since this is one of the conditions for benefiting from it.

That is why there are few freelance journalists in Luxembourg. According to the Press Council's list of journalists, only 15 journalists are registered as freelance out of a total of 377 active journalists. Compared to last year there are three more journalists (12 are registered as freelance journalists out of a total of 371 active journalists). Given the possibility of being hired on a permanent contract in Luxembourg with the new aid regime, being a freelancer is a choice. Indeed, this status is precarious because as freelance journalists, unlike journalists under contract, freelancers pay for their social insurance themselves. However, critics of this new press aid scheme exist. Journalists' salaries remain lower compared to salaries in other sectors in Luxembourg. Among the critics of aid scheme, it is argued that as a result, companies will be incited to lay off senior journalists (who are usually better paid) to replace them with young journalists. That way, they can reach the minimum number of journalists needed to get the press aid and save HR costs at the same time. Another criticism, raised by the new ALEMI - that is not recognized by the press council editor - is that the press aid is attributed on the basis of the number of press cards of the publication requesting for it. The problem is that the decision to release the press cards depends on the press council commission for press cards that is composed of representatives of existing publishers that already benefit from the press help, and that would be hostile to let new publisher benefit from the state subsidies.

The generous direct and indirect state support to almost all the media (public media, press both off and online, community media) makes the life of journalists more bearable than in other countries where the state is less supportive. For a genuine pluralistic media landscape to be realized, it is crucial that journalists can work under decent social conditions. Some media particularly took advantage of this new funding scheme, particularly online news media (such as the outlets of the *maison moderne* group, the free journal *essential.lu* and *reporter.lu*).

Independence and effectiveness of the media authority (18% - low risk)

The indicator on Independence and effectiveness of the media authority scores a low risk (18%). The media authority ALIA (Luxembourgish independent authority of audiovisual) is acting independently from political and economic influences. ALIA demonstrates total transparency in these actions and activities by publishing on its website reports, news, opinions, decisions, notices and annual accounts. Indeed, ALIA website in the news section is updated every month and allows citizens to have transparent access to ALIA's activities as well as to the various notices and annual reports issued by the Luxembourg independent audiovisual authority. The budget is proposed by the director, approved by the board of governance, and then appreciated by the government. This decision as well as annual accounts are published in the legal register (Mémorial). The annual Law on the Budget indicates the budgetary resources allocated to the media authority (under current expenses of the State Department).

Regarding the effectiveness of ALIA, the budget allocated by the state, amounting to 1.480.000 euros in 2023, is not sufficient to perform its functions adequately. It is noteworthy, that the number of employees has increased from 5 to 7 and in 2021 to 13 in 2022, and to 14 in 2023. However, the tasks that ALIA are manifold and too large for merely 14 people - most of which have no background in media regulation law. ALIA has more than 400 channels under its supervision in different languages. In legal terms supervision does not only mean to respond to external claims, but also implies a role of active surveillance and control of all the media under its authority. The increased human and financial resources are all the more insufficient considering that the regulator is and will be in charge of new tasks: media education, the supervision of the elections, the transposition of the DSA and DMA EU Directives and of the EU Regulation called European Media Freedom Act (EMFA).

As indicated in the past report (see MPM 2023) the ALIA still faces some other potential risks: first, ALIA's independence is potentially at risk since the five members of the board are nominated by the government as well as its director following the opinion of the board. Secondly, ALIA does not have the competence to award national and international frequencies and in the future DAB+. Thirdly, the sanctions pronounced by the board of directors appear to be largely insufficient: 25,000 euros is the maximum fine that ALIA can impose.

Universal reach of traditional media and access to the internet (15% - low risk)

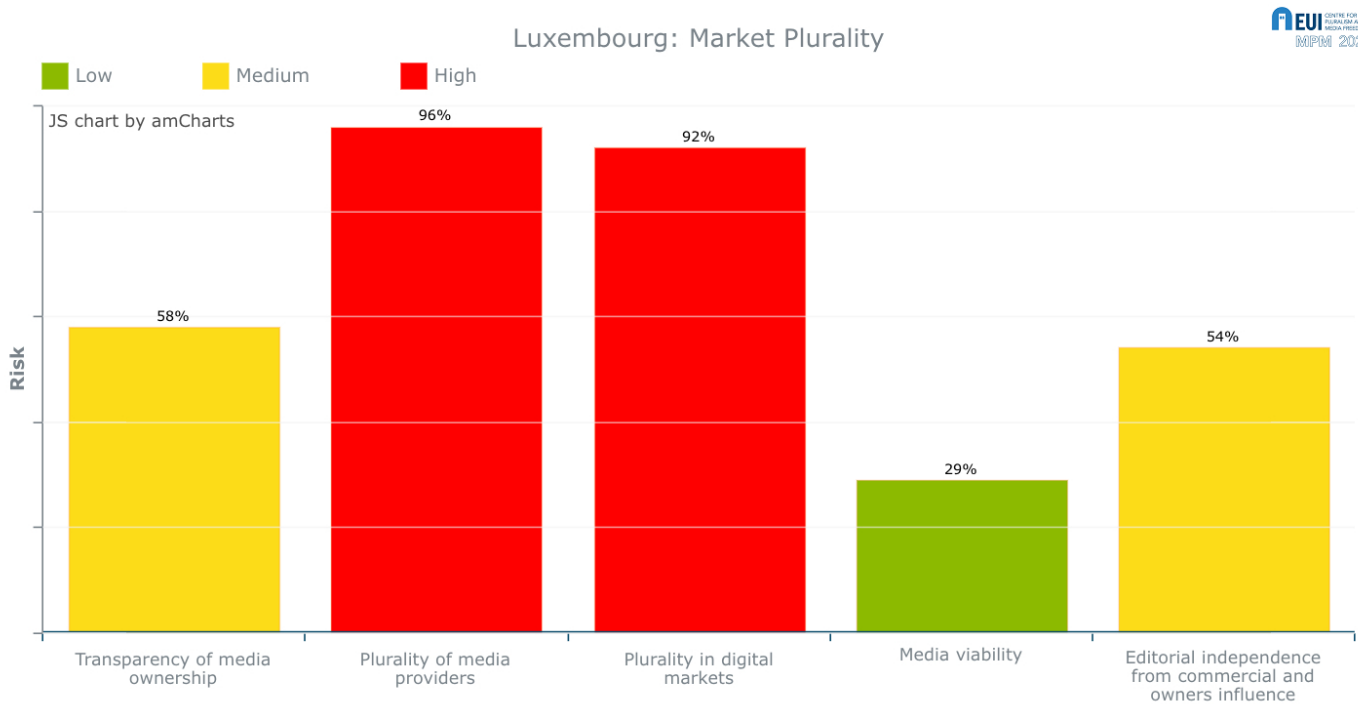
As to the indicator on the Universal reach of traditional media and access to the internet, it scores a low risk (15%). Regulatory safeguards regarding net neutrality are implemented in Luxembourg in accordance with Regulation (EU) 2015/2120 laying down measures relating to open access to the internet. There is no obligation (in law or in conventions) for universal coverage of public service media. Nevertheless, after receiving a second radio frequency in July 2017, the national public service radio (Radio 100.7) reached almost universal coverage. As far as internet coverage is concerned, 99% of the households have broadband subscription. Post Luxembourg dominates the market share for the Internet Service providers with about 58,6%, followed by Proximus (17.6%), Luxembourg online (7,4%), Eltrona Interdiffusion (7%) and Orange communications Luxembourg (6%).

Focus on the digital environment

There is a lack of data about the question if online platforms generally refrain or not from filtering, monitoring, blocking, and removing online content in an arbitrary way. On September 13th 2023 the government introduced a bill implementing the Digital Services Act (DSA) in national law, allowing users to report illegal content on digital platforms. The aim of this new bill is to make digital platforms more responsible and fight against the dissemination of illegal or harmful content on the internet. Accordingly, all intermediary services (platforms) must put in place a mechanism allowing users to report illegal content online. The national authority chosen to take on the role of coordinator for digital services in Luxembourg is the Competition Authority. Concerning online safety, on 9 March 2023, the investigative online-platform *Reporter.lu* reported that they received three letters threatening legal action following a series of articles revealing a fraudulent scheme in the real estate sector. The article shows how the real estate company Cenaro Technical Services and partners, who are under investigation for fraud, offered their services to other promoters.

3.2. Market Plurality (66% - medium 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).



Transparency of media ownership (58% - medium risk)

The indicator of transparency of media ownership scores a medium risk (58%) same as last year. The national law contains specific provisions requiring the disclosure of ownership details in the media sector, but it's limited to print press and is not effective as no sanction is foreseen in case of violation of transparency requirements (see MPM 2023). The Law on the Electronic Media, which covers broadcast and online media, does not specifically set out ownership disclosure obligations but does allow to consult them on request from the ALIA or the Government. Unlike some other countries, there is no updated infographic allowing public to view all media owners. Moreover, even if since 2019 there is a register of beneficial owners (RBE) which references this type of information, the recent judgment of the Court of Justice of the European Union of November 22, 2022 resulted in the limitation of access to the register by the public. This register is now only accessible on request and limited to certain professionals.

Plurality of media providers (96% - high risk)

Plurality of media providers presents always a high risk (96% compared to 97% last year).

The concentration of the media is high since three media companies dominate the media market (one for the radio sector – RTL –, two for the press sector – EditPress and Mediahuis– and one for the TV sector –

RTL). The high level of concentration is due, on the one hand, to the very limited market size and, on the other to the absence of provisions aiming at limiting it. Indeed, Luxembourg remains one of the few EU member states lacking a national merger control law, or a similar provision aimed at limiting horizontal or cross-media concentration of news media. Furthermore, there is no administrative authority or judicial body effectively addressing issues relating to media concentration (see MPM 2023).

In 2023, the Plurimedia survey, that measures the media audience share, has been abruptly interrupted by its sponsors due to allegedly methodological issues. This implies that the public and all actors concerned by the media will have no data on the media consumption which is highly problematic for monitoring the media pluralism of the country.

Plurality in digital market (92% - high risk)

There is a lack of data in Luxembourg about plurality in digital market. That is one of the reasons why this area is still at high risk (92%) and increased this year compared to last year (88%). Even the main online advertising agencies in Luxembourg are known (IP Luxembourg and Regie.lu), we do not have access to the market shares and revenues of these advertising agencies and of the Top4 players in the online advertising sector. Even though the law grants the council for competition powers in order to impose proportionate remedies where the applicable thresholds and/or other ownership limitations are not respected, there are not specific rules and/or updated competition tools to address dominance in the digital markets. ALIA is the national independent media supervision agency but has no competence in this matter.

Media viability (29% - low risk)

The risk score of Media viability has improved (from 51% to 29% in 2023). The improvement is due to the availability of data on employment trends (which was not the case last year) and because the revenues of the audiovisual media are now assessed based on longer-term trends in absence of data available for 2023.

Professional journalism benefits from a generous and effective aid scheme for the online and offline press, and from conventional aid subsidies for radio 100.7 (the PSM), RTL television and radio (which has PSM missions) as well as for radio Ara, a community radio (see MPM 2022 and 2023 for a detailed review of these aids). In addition, in 2022 (data for 2023 are not available yet) the advertisement revenues are stable for the audiovisual sector and have slightly decreased for the radio sector.

It should however be noted that this evaluation of the revenue trend is partial since we do not have full access to the revenues of the different media. We only have access to the state revenues for the media benefiting from the state aid schemes and the advertisement revenues by media branch (ex: TV, Radio, newspapers). It is therefore not possible to have precise and granular estimate of the media viability.

The number of journalists employed in Luxembourg has slightly increased from 373 in 2022 to 377 in 2023. There are few freelance journalists in Luxembourg. According to the Press Council's list of journalists, only 15 journalists are registered as freelance out of 377 active journalists. Given the possibility of being hired on a permanent contract in Luxembourg with the new aid regime, being a freelancer seems to be a personal choice which present some risks of precarity as, unlike journalists under contract, freelancers pay for their social insurance.

Editorial independence from commercial and owners influence (54% - medium risk)

The risk has increased compared to last year (23% in 2023).

There are no legislation or self-regulatory schemes, guaranteeing a clear separation between editorial and commercial activities of news organizations. In practice however, large media in Luxembourg take measure to separate commercial activities from editorial activities. Moreover, the Luxembourgish code of deontology for journalism requires journalists and editors to be independent of any commercial interest and not to accept any advantage or promise that could limit their independence and the expression of their own opinion. Art. 6 of the journalists' code of ethics mentions that journalists and editors must not accept any advantage or promise that could limit their independence or the expression of their own opinion. Furthermore, art. 10 of the press council's rules of procedure insists that a journalist is not allowed to engage in commercial activities or participate in advertising activities. As far as we know, outside influence regarding the appointment and removal of editors poses a low risk. As to owner influence, legal safeguards exist to grant social protection to journalists in case of changes of ownership or editorial line (article 5 of the law on freedom of expression in the media - see MPM 2023). It should however be noted that if a journalist decides to terminate an employment contract and is not hired by another recognized media by the press council, this journalist will be deprived of his press card. Which makes the journalist dependent on the media and constitutes a risk for his independence. The allocation of press cards thus remains an issue for journalists in Luxembourg.

Despite these measures, pressure from advertisers on editorial staff is relatively common often leading to self-censorship on the part of journalists with respect to their advertisers. According to an expert, this problem is particularly spread and severe: *"Subconscious self-censorship is, in my opinion, a deeply ingrained reality in the Luxembourgish press. While serious journalists are caught between a rock and a hard place, other publications lean into this dynamic and publish articles under the guise of journalism with the implicit intent of promoting brands, groups or products. Ultimately, this can be traced back to the fact that advertisements, overt or covert, remain the easiest way to make a media organization profitable – or at least attempt to do so"*. While this phenomenon has been observed through several interviews, more empirical work is required to evaluate the current situation, its diffusion and what type of media and content are particularly concerned by it.

The Consumer Code of July 22, 2016, which includes the transcript of the EU directive on unfair commercial practices, specifies in paragraph 11 of Annex I that the advertorial is an unfair practice. The advertorials are understood as ads that are not identified as such. The new aid scheme that came into force in 2021, has included in its conditions that the publications benefiting from them should not have advertorials. It is the duty of the press council and of ALIA (for the audiovisual media) to control the presence hidden advertorials. In practice, however, it is almost impossible to have an effective control for all the publications and broadcasts of the presence of hidden advertorials. In absence of a permanent control, sanction may only emerge for particular cases. For example, in the context of the application of the public funding scheme, a journal was temporarily denied the public funding because several of its journalists admitted to the press council that they used to publish advertorials that were not distinguishable from journalistic content emanating from the editorial staff. In this case journalists get their press card suspended or retired.

Lastly, as indicated above, the disclosure of media owners, that allows to identify potential commercial influence, is limited only to the written print press for the first edition of the year, while for other media this information is either not available or just on demand for electronic media to the ALIA or the Department of

Focus on the digital environment

The digital media environment is characterized by the presence of an increasing offer pure players. Among them, three in 2023 benefit from the 2021 state funding scheme for professional journalism, in so far as they fulfilled the conditions defined by the law, which include to provide journalist information of general interest and not to serve as promotional tool of an industrial or commercial activity. These are *chronicle.lu*, *lesfrontaliers.lu*, *reporter.lu*. These publications, whose presence is reinforced by state funding, arguably contribute to mitigate the highly concentrated market plurality as they do not belong to any major media group and have distinctive objectives. *Chronicle.lu* is an online information service targeted towards the English-speaking international community. *Lesfrontaliers.lu* is a French and German online information service that targets essentially the commuters and the cross-border workers. And *Reporter.lu* is a highly active online investigative media which targets essentially the resident population with most articles published in German.

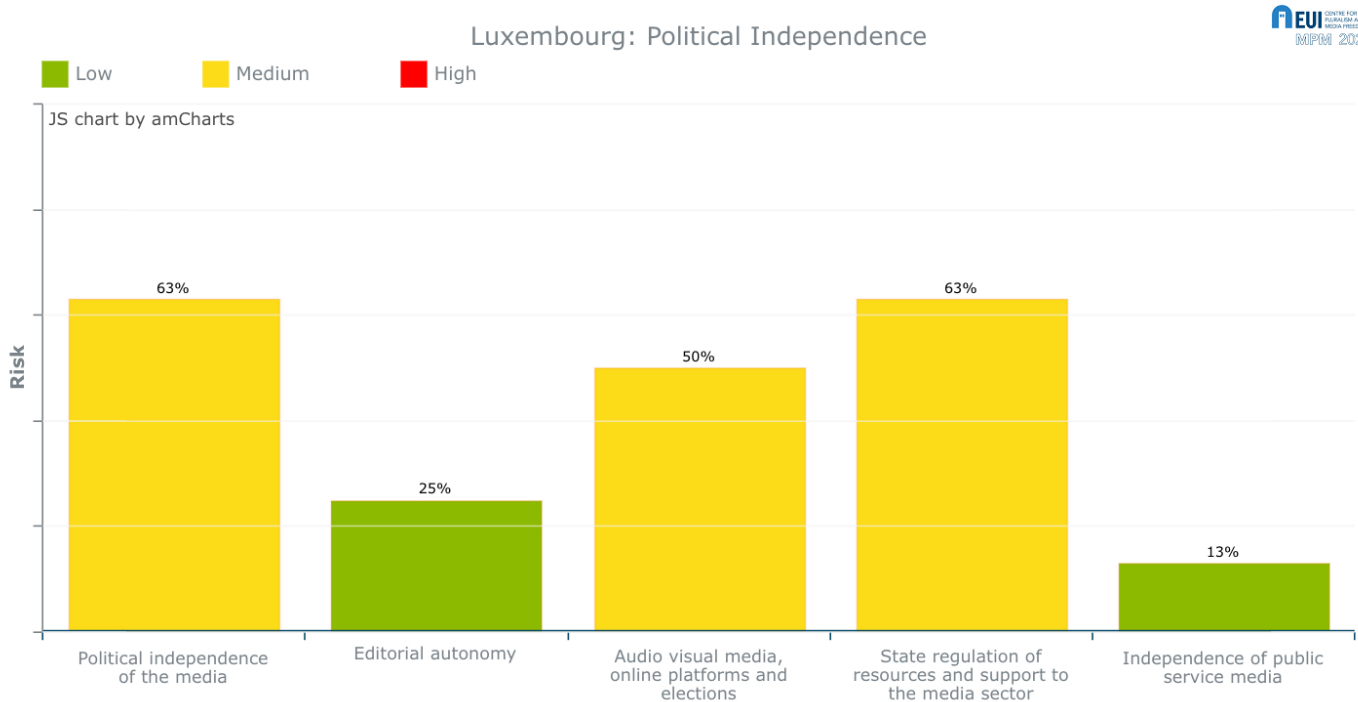
The disclosure of ownership depends on the good will of the media themselves. For pure player that benefit from a state subsidy, access on request is possible to the Department of Media, Connectivity and Digital Policy belonging to the Ministry of State.

Besides, on March 30, 2022, the Chamber of Deputies adopted the two bills transposing two European directives on copyright and rights: Directive 2019/789 establishing rules on the exercise of copyright and rights applicable to certain online transmissions of broadcasting organizations and retransmissions of television and radio programs and Directive 2019/790 on copyright and related rights in the digital single market. These two directives were adopted on April 17, 2019, and are now transposed into national law. The Luxembourg Government had launched a public consultation until 2 April 2021 allowing the stakeholders to express their views and needs with respect to the draft legislation. The Luxembourg Government mentioned that, for the purposes of harmonizing the laws and future case law of the Member States, they prepared the Luxembourg draft legislation taking into account the Belgium draft legislation and the French Law of 24 July 2019.

At last, Luxembourg has not introduced a digital services tax.

3.3. Political Independence (43% - medium risk)

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



Political independence of the media (63% - medium risk)

The indicator political independence of the media presents medium risk (63%) as last year. Even though the law does not regulate conflict of interests between owners of media and ruling parties, partisan groups, or politicians, the risk of political interference in the media is globally restrained. Originally daily newspapers and political parties were closely linked, and politicians used to influence the content of newspapers. Today, this is no longer the case, although links between parties and newspapers still exist, they don't constitute anymore a danger for their independence in the future. For example, the editor-in-chief of a journal, confirmed the low risk by her testimony : *"Having worked in the print media for almost 15 years, I can confirm (...). Personally, I have only once experienced someone trying to exert political influence on my journalistic work. This was an attempt to intimidate me on the level of local politics. In that case, however, I was supported by the media organisation I was working for at the time. In general, the journalists I know are very proud of their independence and denounce attempts to influence them when they occur"*.

The national audiovisual sector (i.e. television) that essentially boils down to RTL Télé Luxembourg is to be considered as rather independent to conflict of interest in practice even though the nomination of the board of CELD-UFA is partly defined by a partisan logic (see MPM 2023). This does not have negative consequences on its political independence as its programming is defined by its public service missions and a commercial logic. RTL is under the supervision of the ALIA and of a surveillance commission (composed by members nominated by the governments and one member nominated by the parliament) which mission is to control that they respect the ongoing and forthcoming public service convention that will start in 2024

and last until 2030. This being said, some fear are expressed of whether on 18 September 2023, the political party ADR filed a complaint to ALIA in defamation against RTL for its coverage during the legislative elections of October. The article focused on the links between the ADR and a French fundamentalist Catholic movement, Civitas, also active as a far-right political party of the same name. The RTL article mentioned that the president of Civitas participated at an ADR conference at the beginning of the year, suggesting that ADR is also far-right party. ALIA indicates in its decision of September 25th that M. Leo Wagener who assimilated in the article ADR with CIVITAS and the ADR deputy Fernand Kartheiser had the opportunity to express their point of view on the subject. The right to reply has therefore been respected. The complaint was therefore closed.

While RTL is considered politically independent, this is not the case for municipal channels, whether through a platform or cable network. In its report of 2018, ALIA observed that 1991 law on electronic media "does not mention of a concession or permission in relation to municipal channels, even though they are becoming increasingly important in the public and political life of municipalities." Consequently, the regulator does not have the necessary instruments to ensure that these programs do not become an instrument of propaganda for the ruling majority and more particularly during electoral campaigns. In addition, in the event of a complaint, the regulator is not always in position to identify the editorial manager from whom he could ask for explanations or inflict a sanction. As underlined by the regulator and reporter.lu in the context of the local elections of June 2023, this problem continues even after having been raised by the regulator in 2019.

Editorial autonomy (25% - low risk)

The indicator editorial autonomy presents low risk (25%). Editorial content in the news media is independent from political influences in practice for private, community and public service media. Even though there are no report investigating the political independence of the media editorial content we did not come across any evidence - such as complains addressed to ALIA or the Press Council – of such threat.

Audiovisual media, online platforms and elections (50% - medium risk)

This score increases from low risk (30%) last year to medium risk (50%), depending both on the 2023 developments as well as to methodological changes. In 2023, the independent national media authority ALIA was in charge of overseeing municipal and legislative elections in the media. The supervision of the political campaign is limited to RTL radio and television (due to its public service mission) and to the PSM, radio 100.7. It includes the regulation and supervision of the airtime allotted to the party lists, the conditions for the production, programming and broadcasting of electoral spots, the conditions for the organization and broadcasting of political debates (e.g. round tables), as well as the duration of the media electoral campaign. Starting from 2019 the independent national media authority ALIA was asked by the government to assure the impartial realization of the task. In July 2022, a bill was passed to legally formalize this task (see MPM 2023).

During the local election of June 2023 the electoral campaign on PSM was globally fair. However, three complaints were submitted to the ALIA. Two cases concerns Radio 100.7: the case of the "Piraten" party and the case of the "Déi Konservativ" party. The Piraten party contacted ALIA by email to send an informal complaint to the authority for not having been selected for the interviews called "Invité.e vum Dag". It turned out that this was an oversight from Radio 100.7, that the radio rectified immediately (May 16, 2023). The same day, "Déi Konservativ" party sent an e-mail to ALIA also for not having been selected for a series of interviews relating to the small parties. Unlike the Piraten party, Radio 100.7 did not rectify and indicated to

ALIA that the interview with the “Déi Konservativ” party would not be scheduled. The ALIA indicates in its report that it has limited itself at this stage to taking note of this decision (p.18) and observed that fair representation is not interpreted in the same way by Radio 100.7 and RTL. Indeed, RTL considers that from the moment a political party competes in more than one municipality, it has the right to be represented in the media space, while Radio 100.7 considers other factors, such as the size and the history of the parties, to give them airtime. Following this line, Radio 100.7 decided to put “Déi Konservativ” on an equal footing with the “Biergerlëschten” (in English: citizen lists) which only compete in one municipality, and not with small parties, such as the KPL, which have existed for many years. While ALIA did not share the opinion of Radio 100.7, considering that the principle of fairness is not respected, it could not interfere with the editorial freedom of the PSM. The third case concerns the presence of the Minister for Defence, Mobility and Public Works at RTL program “Background am Gespréich”. An individual was worried about whether inviting a minister a day before the elections would not influence the elections. ALIA considered that giving visibility to a political party the day before the municipal elections went against the obligations of impartiality, objectivity, respect for the pluralism of ideas and freedom of information imposed by the Article 4 of the specifications. A reprimand was therefore pronounced against the company CLT-Ufa, owner of RTL.

The electoral supervision by ALIA of the official campaign on PSM is a progress, but it is not sufficient to guarantee the organization of fair elections. As pointed out by ALIA it should also cover the other media that are active in the campaign. It should supervise the private radio, the social media, as well as television channels that are not under its supervision. These are private media – such as .dok TV (now closed since december 2023), Apart TV, Uelzechtkanal, Nordlicht - and municipal channels– such as Dikrich TV, Esch TV, Petange, Mersch, Dudelange, Differdange, Berdorf, Mamer TV.

The absence of supervision of municipal channels is particularly problematic as these are most of the time managed and financed by municipal administrations and do not follow the journalistic professional standards. For example, on May 15, 2023, Dikrich TV presented the inauguration of a site for the construction of a parking lot as a great project without giving a voice to those who opposed this project. It is the same for Mamer.TV, which even if it did not broadcast new program during the municipal electoral campaign showed a loop of programs which highlighted personalities belonging to the political majority. The reserve period was, however, respected in the selection of private media and municipal televisions observed by ALIA. The latter also observed some trends concerning the coverage of the local political campaign in social media. They observed that some parties (The Fokus, Piraten, LSAP and ADR) created more spots on communal issues via YouTube and that the reserve period (from June 10, midnight to June 11, 2 p.m.) was not respected by all parties).

Regarding paid political advertising, that is advertising outside the official political campaign in the PSM, there is no regulation aiming at controlling or limiting them. Political parties generally reach a gentlemen's agreement on spending margins. For the last municipal and legislative elections of 2023, the competing parties came to an agreement stating that the total budget for advertising in the written press, on the Internet, on the radio, on television or for film trailers is limited to 100,000 euros including tax (production costs not included). However, there is no control and enforcement mechanisms in place to supervise the spending of political parties for electoral advertisement.. As a result, electoral spendings are not transparent.

State regulation of resources and support to media sector (63%- medium risk)

The indicator state regulation of resources and support to media sector presents a medium risk (63%) and has slightly increased compared to last year (58%). The broadcasting authorization rules for radio or television channels are transparent but can lead to contradictory decisions. Depending on the nature of the spectrum, the allocation is granted either by the State or by the ALIA. The latter controls the authorizations of regional radio stations (with transmission network) and local radio stations. The other spectrum allocations – for national and international broadcasting, for radio and television – are granted by the government by Grand-Ducal regulation after consulting the Authority (ALIA). In the past this two-headed regulation – one political and the other administrative – of the spectrum allocation has led to contradictory decisions (see MPM 2022).

The aid scheme for professional journalism as defined by the Law of 30 July 2021 provides fair and transparent rules for the distribution of direct subsidies to print and online publication. The annual amounts for each publication are accessible on the public open data platform (see MPM 2023 for a detailed presentation of aid scheme). The resources for the PSM Radio 100.7 are regulated by the law of 13 July 13 2022 on the organization of the public establishment "Public service media 100.7". These are also transparent and fair. In April 2023 the radio and Ministry of Communications and Media signed a pluriannual convention under which both parties agreed on an increase in the budget of more than 25% for 2024 and a total allocation of nearly 80 million euros for a period of 7 years . The direct subsidies of the audiovisual and radio sector concern essentially RTL television and radio and amount to 10 million per year until 2023 included. In May 2022, the CLT-UFA and RTL Group financing law was approved for an amount of 97.6 million euros from 2024 to 2030, corresponding to an annual amount of about 15 million euros. In addition, RTL will retain the right to use national frequencies until 2030. Frequencies estimated at around 5 million euros, against 10-15 million euros previously. Officially, the increase in the state subsidy should compensate for the loss of national frequency values and to extension the public service missions to the radio and the online offer. Some competing media have argued that the state subsidies put them at a disadvantage against RTL in the online market. Another relevant direct subsidy concerns the community media, radio ARA. It benefits from a multi-annual convention (from 2021 to 2025) that grants 250 000 euros per year. The community radio however considers that this amount is not sufficient to properly function on the long run. They campaign for the introduction of a law recognizing community media. In sum, the new laws and conventions with RTL and radio ARA, establishes rather fair and transparent rules for the distribution of direct subsidies to media outlets, but all the media do not benefit from the different support schemes, in particular the local radio and tv channels.

Finally, there are no clear rules and public data on the amount paid by the State through indirect aid and paid advertising. The most recent data were provided as a response to the parliamentary question of the pirate party MP, Marc Goergen and indicated the official expenditures of the different ministries of the state from 2014 to 2021 for the largest print media. It confirmed that there is a huge gap between the different papers and that the total amount varies from one year to the other. Moreover, there is a lack of data for several relevant media such as l'Essentiel, RTL and weekly newspapers (e.g. telecran, revue). The Ministry of State argues that they do not have access to these data because they are not communicated to them (Land, 2021 [43]).

Independence of public service media (low risk 13%)

The independence of public service media remains the same score (low risk, 13%). The only public service media in Luxembourg is Radio 100.7. Its independence vis-à-vis the government and any other political influence was reinforced and legally sanctioned by the adoption of the law of 2022 organizing the public establishment "Public service media 100.7" (see MPM 2023) and by the pluriannual convention signed in 2023 which ensures sufficient income until 2030.

Focus on the digital environment

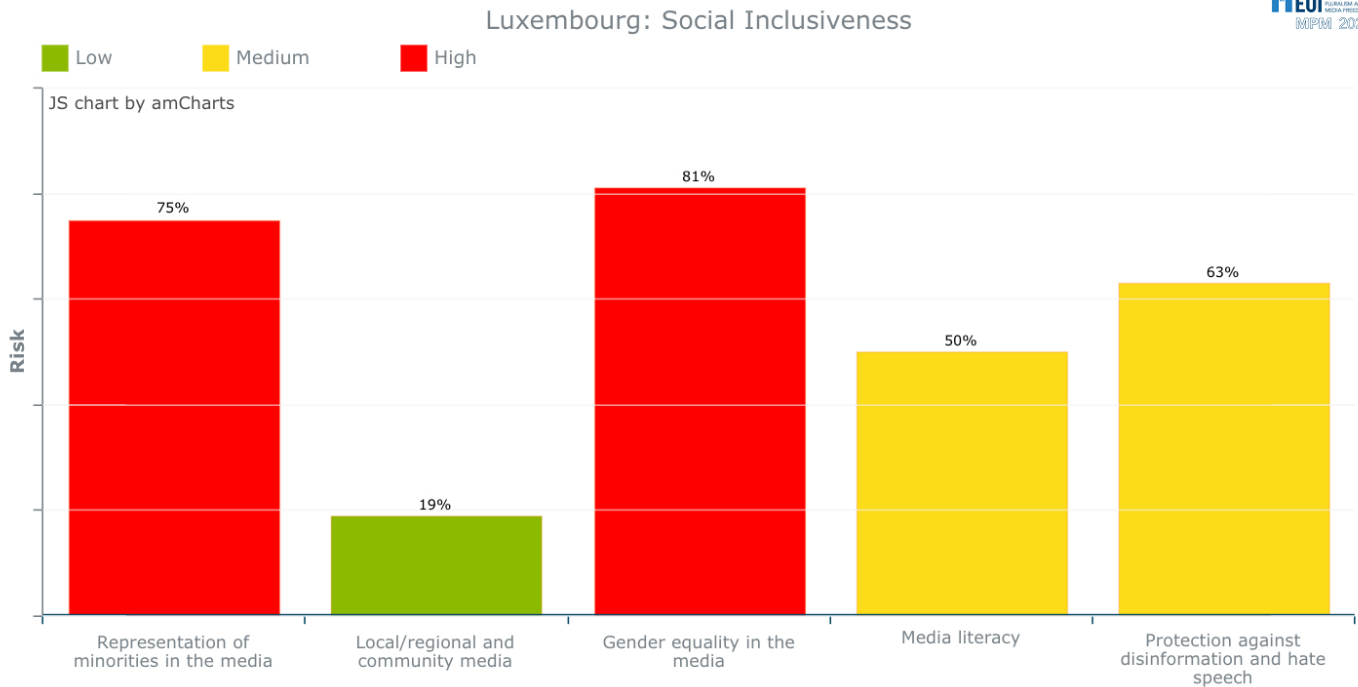
The Political Independence area scores 27% in the digital environment.

The three pure players which receive state aid are politically independent. One of the beneficiaries of this aid is the investigative newspaper Reporter.lu which has provided critical and independent coverage of social and political life in Luxembourg targeting both government and opposition parties. The other native digital media is *Chronicle.lu* which provides information service targeted towards the English-speaking international community; The third digital native media is *Les frontaliers.lu* which provides practical and general information targeting commuters and foreign residents.

Another point related to political independence in the digital environment concerns the elections that occurred in 2023 at the local and national. Luxembourg scored high risk (75%) for the variables assessing the political advertising online because there is a lack of regulation, transparency and supervision. On a more positive note data protection authority (CNDP) which monitors the use of personal data of individuals by political parties for election campaign purposes was active during the election. It has issued several communications presenting detailed guidelines to ensure the GDPR protection of personal data during the election periods. Individuals can lodge a complaint to the CNPD if they believe that the protection of their personal data has not been respected. In its opinion on draft law no. 5859 amending the amended electoral law of 18 February 2003 published on July 1st, 2022, the CNPD nevertheless warned against the risk that data from the electoral lists may be disclosed for other purposes. For example, the CNPD has received complaints in connection with the use of personal data appearing on copies of the electoral lists.

3.4. Social Inclusiveness (58% - 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.



Representation of minorities in the media (75% - high risk)

The indicator representation of minorities stays the same as last year. There are no legally recognized minorities in Luxembourg. The Grand Duchy presents the very paradoxical situation in which the sum of its linguistic minority groups could soon become the "majority". In January 2022, 47,1% foreigners were living in Luxembourg and the ratio of foreigners is still increasing. The main foreigner minorities are: The Portuguese 30.8% - The French: 16.2% - The Italian: 7.9% - The Belgian: 6.4% - The German: 4.2%. According to the STATEC report in 2021, the linguistic diversity of Luxembourg is increasing sharply. Even if the Luxembourgish language remains the main language of the inhabitants of Luxembourg it decreased from 55.8% in 2011 to 48.9% in 2021). Luxembourgish is then followed by Portuguese: 15.4% of the population has Portuguese as their main language compared to 15.7% in 2011. In third position, French is the main language for 14.9% of the population compared to 12.1% in 2011. The other main languages are English for 3.6%, Italian for 3.6%, and German for 2.9% of the population. French remains the language of integration through government policy and remains, to this day, the most spoken language on the job market.

Despite this obvious multi-lingual diversity, the law does not guarantee access to airtime on PSM channels to linguistic minorities. Indeed, linguistic minorities do not have a platform on the Luxembourgish PSM radio 100.7. It should be noted that this absence of airtime to linguistic minorities in PSM is partly compensated by the services offered by RTL television and RTL website. Indeed, RTL television offers a daily information program in Luxembourgish with French subtitles and a short information program (around 2-3 minutes) in French. In addition, RTL developed over the last few years a digital offer in French and English (RTL infos & RTL Today). However, unlike Television, RTL developed its French or English programs in radio and online

outside the framework of their public service missions. According to an expert: “the fundamental reasoning behind the English and French services offered by RTL online (and for English in radio) is commercial: being able to convince advertisers that RTL is able to reach the whole population of Luxembourg, not just those speaking Luxembourgish”.

Regarding media accessibility for people with disabilities, subtitles are available on a regular basis but in limited quantity and there is room for improvement. RTL Télé Lëtzebuerg includes French subtitles, in addition to Luxembourgish for national news from the second broadcast at 8.30 pm. We should however note that it is the only program that benefits from subtitle. However, so far audio descriptions for blind people are nonexistent. The new convention signed in June 2022 defining the public service missions for RTL television, radio and online, indicates that RTL Télé Lëtzebuerg should provide solutions that are adequate and financially sustainable to ensure that people with hearing impairments have access to television programs. In other words, it has an obligation of means, and not of result. In addition, ALIA required during the local and national electoral campaigns in 2023, the parties to include subtitles in their electoral campaign spots which were broadcasted on RTL.

More generally, media accessibility policies exist but are insufficient. The government has set up action plans implementing the Convention on the Rights of Persons with Disabilities and its Optional Protocol (adopted on December 13th 2006 by the General Assembly of the United Nations and entered into force on May 3rd 2008). The ongoing action plan that covers 2019-2024 presents limited and non-binding measures regarding media accessibility for people with disabilities (see MPM 2023). These very limited objectives should be promoted by the media authority, which has limited resources. It is relevant to underline that the law concerning the financial support for professional journalists also requires media that receive subsidies to elaborate an annual report that covers measures taken to improve access to content for people with disabilities. According to the NGO handicap.lu, such measures remain insufficient.

Local/regional and community media (19% - low risk)

Local/regional and community media is at low risk (19%), this indicator has decreased compared to last year (25%). The law grants regional or local media access to media platforms and is implemented effectively. The modified law of 1991 on electronic media recognizes the existence of "local radio service" without however specifying that it has special missions and obligations. Luxembourg has 19 local audiovisual media according to the Luxembourg Independent Audiovisual Authority (ALIA). Beyond this list of local audiovisual media published by ALIA, the concept of local media is not present in the written press. Indeed, according to the press council's list of editors, the daily print and online media cannot be precisely defined as local media for the simple reason that local news cohabit with national news within the same newspapers, websites or even magazines given the small size of the country. Even if the offer of certain information concerns a defined public of local populations of cities, regions of Luxembourg, this offer is part of a global offer of news within the same media of the written press and online. . There are no criteria regarding the distribution of state subsidies to local or regional media. In practice, it appears that most local radio stations do not benefit from state subsidies, while some local TV channels do.

The legal framework of the law of 27 July 1991 on electronic media provides a definition for radio “local media” but not of community media. There are two community media with a national vocation: “forum” and “radio Ara”. The State signed a pluriannual convention with the community media, radio ARA, in May 2021, allocating 250.000 per year until 2025 to ARA. The radio has some 150 volunteer employees and broadcasts content not only in the main languages of the country, but also in the languages spoken by

immigrants and refugees. Its financial situation was unstable and worrying until it signed this multi-year agreement with the State. As mentioned above, the community radio however considers that this amount is not sufficient to properly function on the long run. The monthly publication “forum” is financed through the new bill an aid scheme for professional journalism voted by the Chamber of Deputies on July 8, 2021. This bill contains a new section entitled “media and citizenship education”, which recognizes for the first time (article 9), the existence of “citizen publishers”, which would correspond to the community media. This new category of publishers benefits from an annual subsidy of 100,000 euros with conditions. As things stands, community media are in a better shape that few years ago, but in absence of a law recognizing and protecting them, there is a risk that the financial support would be cut by a government that is unhappy with their work .

Gender equality in the media (81% - high risk)

The indicator gender equality in the media is still at high risk (81%).

Luxembourg media landscape remains particularly weak when it comes to the presence of women in key positions. The PSM does not have a gender equality policy and there are no women represented on its executive board that is composed by one male director. There is however an almost equal representation in the PSM management board with 6 men and 5 women. Moreover, the absence of gender policy does not imply that in practice we observe problem of gender discrimination both in terms of collaborator and programming in the PSM. In the audiovisual sector (i.e. RTL television and radio) the result is even worse as its management board (Clit- Ufa) is composed of only 22% of women (i.e. 4 women out of 18 members) and there is just one women out of 10 men in the executive board that combine RTL television and RTL radio.

The share of women among the chief editors of the main news media in Luxembourg is insufficient in terms of equity. Indeed, for the main television and radio, the editors in chief is one women and 3 men (RTL luxembourg: Guy Weber; RTL radio: Roy Grotz; radio 100.7: Jean-Claude Franck; Eldorado: Cynthia Meris). For newspapers, there is only two woman out of six (Luxemburger Wort: Roland Arens, Tageblaaf: Armand Back, Luxembourg Times: Schnuer Cordula, L'essentiel: Saïd Kerrou, Lëtzebuenger Journal: Melody Hansen, Le Quotidien : Laurent Duraisin). And for the other types of new media (magazine, weekly and pure players), there are two women out of seven (Delano: Aaron Grunwald; Revue: Eric Hamus; Télécraan: Martina Folscheid ; d'Lëtzebuenger Land : Peter Feist; Reporter.lu: Christoph Bumb; Paperjam.lu: Thierry Labro ; virgule.lu : Melodie Mouzon). In total, only 5 women occupy editor-in-chief positions for 18 media.

Given the lack of data, it is not possible to assess whether women represented in news and current affairs broadcasting in a way that is proportionate and free from stereotypes.

Media literacy (50% - medium risk)

The risk of the indicator media literacy has increased (from low risk, 27% to medium risk 50%). In a context where the boundaries between serious journalistic information and disinformation produced by content creators and users is increasingly blurred, the necessity for a solid and extended media education is more important than ever.

The media literacy policy is already well established thanks to several parallel initiatives involving different categories of the population such as “Bee secure” and a legal framework aimed at favoring its development. There is, on the one hand, law on the aid scheme for professional journalist which obliges new categories of "citizen editors" to contribute to the promotion of media literacy and for the other publishers to report annually on the actions undertaken in favor of media literacy. On the other hand, following the transposition of the AVMS Directive into national law it has a prominent role in the coordination and the promotion of the media literacy initiatives.

The existing policy on media literacy offers however some room for improvement. Indeed, the media education policy concerns only primary and secondary education and only focuses on the broad definition of media education (mastery of digital tools) and not on education about the functioning of professional journalism and the the formatting of information (see MPM 2023). This more demanding interpretation for media education explains that compared to last year the risk increased from low to medium. Besides, the training of teachers in media education has shortcomings. The guide Medienkompass training for teachers only focuses on a broad definition of media education (media as tools) and does not provide teachers with the knowledge to enable students to grasp the functioning and importance of professional media. There are only a few one-off trainings online, such as the European "Media Literacy in a time of fake news ". Moreover, the teaching and research on media education should be improved at University of Luxembourg^[2]. By offering media education at University level, Luxembourg could provide more support to primary and secondary education, train teachers more and ensure the continuity and sustainability of learning in media education. Luxembourg, for example, does not have a media and information education center or even higher/university education dedicated to this subject to train teachers.

Focus on the digital environment

Protection against disinformation and hate speech (63%) are considered at medium risk (same risk level as last year).

As in other member states, the distrust in the media is high with only 43% of people declaring to trust the media in Luxembourg in 2023 (Standard Eurobarometer 98) . This is largely due to a feeling that disinformation has increased through the social media particularly when the covid-crisis overtook the country. A report from EU Desinfo lab and Edmo Belux from June 2023, confirms the presence of disinformation related to the Covid-19 vaccine, stemming essentially from borders countries. In 2023, there were several other cases of disinformation: a fake photo circulated on social media along with hateful and homophobic content about former prime minister Xavier Bettel. There were fake messages related to the climate change and to the Russia/ Ukraine war.

There is no legal basis to tackle disinformation but there are several initiatives, among which Bee secure and the hub Edmo Belux.

Bee secure is a public platform on which people can report illegal content with Stopline and they can be informed about security and usage online with the helpline. This is a government initiative of the Grand Duchy of Luxembourg, operated by the National Youth Service (SNJ) and the Kanner-Jugendtelefon (KJT), a counselling service for children and young people, in partnership with Luxembourg House of Cybersecurity, the Police Lëtzebuerg as well as the General Prosecutor's Office of the Grand Duchy of Luxembourg.

EDMO Belux is a collaborative initiative between various organizations - among which RTL, RTBF and AFP - in Belgium and Luxembourg aimed at countering disinformation through research and investigative work. EDMO Belux engages in fact-checking, investigative reporting, media literacy campaigns, and research activities to raise awareness and empower citizens and media practitioners in the fight against disinformation.

In March 2023, **Luxembourg adopted the declaration on building trust and strengthening democracy**, leading to the launch of the *OECD Resource Center platform on disinformation and misinformation*. The latter intends to help public authorities, the media and civil society to strengthen their respective and common actions to support the integrity of information. To this end, the Luxembourg Ministry of Justice has made a financial contribution of 100,000 euros to the OECD Resource Center on Dis- and Misinformation.

However, as already mentioned last year (seem MPM 2023), these initiatives focusing on disinformation do not cover cases of ideological manipulation of information that fuel distrust on journalistic work. In September 2022 a journalist from l'Essentiel highlighted the lack of support regarding the manipulated reuse of their journalistic content for the purposes of disinformation, particularly on social networks.

4. Conclusions

Globally the Luxembourgish media landscape did not fundamentally change in 2023. We however observe slight worsening for several dimensions, which are partly due to the presence of new variables and to the stricter interpretations that was applied to a few variables. More precisely, Fundamental Protection risk has decreased by 5% (from 25% in MPM2023 to 20% MPM2024). Market Plurality has increased by 3% (from 63% to 66%). Political Independence has increased by 4% (from 39% to 43%). And Social Inclusiveness has increased by 4% (from 54% to 58%).

The significant elements that marked the year 2023 are the followings: in the area of the fundamental protection, the intention of the new PM to introduce a bill on the right of access to information for professional journalists; the transposition in national law of the EU Whistleblowing Directive and the bill implementing the DSA; the creation of a new association, ALEMI, defending the interests of the small press editors, that do not benefit from the media state support. The area of market plurality was marked by the abrupt interruption of the Plurimedia surveys that measures the media audience share. The area of political independence was dominated by the municipal and legislative elections occurring in June and October 2023. They confirmed that the existing legislation and supervision means are insufficient to fully guarantee the run-off of fair election for the competing political parties. Lastly concerning social inclusiveness there are no noticeable changes compared to last year. The issues raised last year concerning the inclusion of certain minorities based on language, gender or handicap, remain.

Our recommendations are the following:

With regards to **Fundamental Protection**, we invite the authorities:

- To improve the access to administrative information for journalists and for citizens to foster trust between the state and citizens.
- To further extend the competences and means of the national authority (ALIA).
- Introduce an anti-SLAPP legislation.
- To improve the professionalization of the media associations, in particular the Press council and the ALJP.

With regards to **Market Plurality**, we invite the authorities:

- To improve transparency of media ownership by centralizing them in an easily accessible format.
- To find a permanent solution to ensure an annual and neutral study of the media and their audience.
- To provide publicly available data on the revenue of offline and online media (including online platforms).
- To review the financial funding of the media landscape to also consider the specialized media that play a relevant role for the society (such as cultural and sport media).
- To provide publicly available data on audience and advertising for offline and online media (including

online platforms).

With regards to **Political Independence**, we invite the authorities:

- To enable ALIA to effectively regulate the media electoral campaign by integrating other media, notably social media and the private radio channels, and the municipal platforms.
- To guarantee transparency and accessibility of the spending for political advertising both offline and online.
- To define rules that ensure a fair distribution of indirect state subsidies and their full transparency.

With regards to **Social Inclusiveness**, we invite the authorities:

- To improve the offer and accessibility to linguistic minorities in the public service media (radio 100.7).
- To improve access to media (both offline and online) to people with disabilities.
- To encourage women's access to key positions (both in governance council and executive boards).
- To improve media literacy in journalism in collaboration of University of Luxembourg. To this end, a dialogue between the Ministry of Education, journalists associations, the Press Council and media studies researchers would be necessary.
- More generally, we underline the necessity to have a multi-stakeholder center that would promote the collaboration and the research to timely respond to the multiple challenges raised by the digital transformation of the media landscape.

5. Notes

- [1] « Loi du 30 juillet 2021 relative à un régime d'aides en faveur du journalisme professionnel. »
- [2] Contrary to other European countries and what is advocated in the EU Directive 2018/1808 on audiovisual media services, there are no media literacy courses in higher education at the University of Luxembourg.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Raphael</i>	<i>Kies</i>	<i>Research Scientist</i>	<i>University of Luxembourg</i>	X
<i>Stephanie</i>	<i>Lukasik</i>	<i>Researcher</i>	<i>University of Luxembourg</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>Luc</i>	<i>Caregari</i>	<i>Journalist</i>	<i>Reporter.lu</i>
<i>Mike</i>	<i>Koedinger</i>	<i>Chairman of Maison Moderne</i>	<i>Maison Moderne</i>
<i>Thierry</i>	<i>Hoscheit</i>	<i>President of the Board of Directors</i>	<i>Autorité Luxembourgeoise Indépendante de l'Audiovisuel (ALIA)</i>
<i>Christophe</i>	<i>Goossens</i>	<i>CEO</i>	<i>RTL Lëtzebuerg</i>
<i>Jean-Lou</i>	<i>Siweck</i>	<i>Director</i>	<i>Radio 100.7</i>
<i>Melody</i>	<i>Hansen</i>	<i>editor in chief</i>	<i>Letzebuerguer Journal</i>
<i>Richard</i>	<i>Graf</i>	<i>Woxx executive committee</i>	<i>Woxx</i>
<i>Misch</i>	<i>Pautsch</i>	<i>Journalist</i>	<i>Letzebuerguer Journal</i>
<i>Paul</i>	<i>Peckels</i>	<i>Chief executive officer</i>	<i>Mediahuis</i>
<i>Veronique</i>	<i>Faber</i>	<i>Chair</i>	<i>Board of Directors Radio 100.7</i>
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