

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: Poland

Beata Klimkiewicz, University of Krakow

Research Project Report

Issue -
June 2024



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 (56% - medium risk)	12
3.2. Market Plurality (68% - high risk)	15
3.3. Political Independence (66% - medium risk)	18
3.4. Social Inclusiveness (57% - medium risk)	23
4. Conclusions	26
5. References	29
Annexe I. Country Team	
Annexe II. Group of Experts	

© European University Institute 2024
Editorial matter and selection © Beata Klimkiewicz, 2024

This work is licensed under the Creative Commons Attribution 4.0 (CC-BY 4.0) International license which governs the terms of access and reuse for this work. If cited or quoted, reference should be made to the full name of the author(s), editor(s), the title, the series and number, the year and the publisher.

Views expressed in this publication reflect the opinion of individual authors and not those of the European University Institute.

Published by
European University Institute (EUI)
Via dei Roccettini 9, I-50014
San Domenico di Fiesole (FI)
Italy
ISBN:978-92-9466-577-5
doi:10.2870/454716



**Co-funded by
the European Union**

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or EACEA. Neither the European Union nor the granting authority can be held responsible for them.

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 Poland the CMPF partnered with Beata Klimkiewicz (University of Krakow), 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

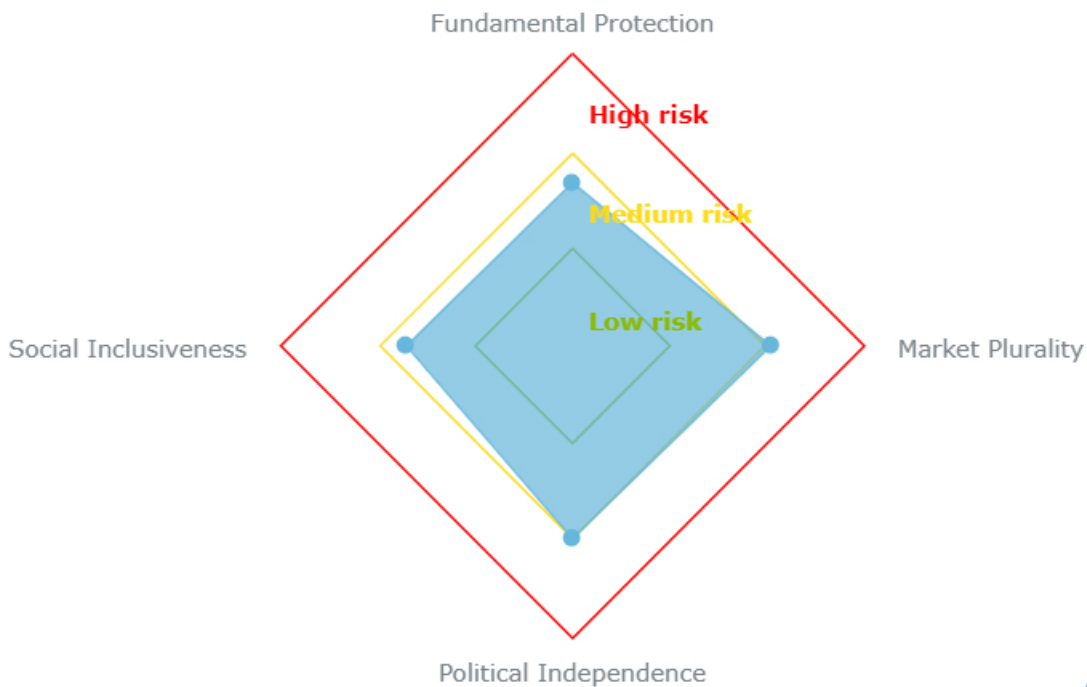
- **Population and territory:** Poland's area of 312,685 square kilometers was inhabited by a population of 37.68 million in October 2023 (GUS, 2024A). A long-lasting decreasing birth rate has been recently balanced by migration flows.
- **Language:** The Polish Constitution recognises Polish as the official language (The Constitution of the Republic of Poland, Article 27).
- **Minorities:** The state officially recognises nine national minorities, four ethnic groups, and one community using the regional language (Kashubian) (The 2005 Act on national and ethnic minorities and on the regional language). According to the 2021 census, the largest minorities include: Silesian (585,700 in total), Kashubian, German and Ukrainian (GUS, 2023A). In addition, a number of foreigners and immigrant groups reaches 1.4 million. 73% of these are Ukrainians, 4% Belorussians, 2% Moldavians and 2% Georgians (Tilles 2023; GUS, 2023B, p. 1). In addition, since February 2022, Poland has welcomed a significant number of refugees from Ukraine. According to UNHCR data, as of September 2023 there were around 960 thousand registered Ukrainian refugees in Poland (The United Nations High Commissioner for Refugees, 2023).
- **Economic situation:** In the aftermath of Covid-19 pandemic and Russian invasion on Ukraine, the economic situation has been more volatile in Poland. According to the preliminary estimate, the increase of real gross domestic product (GDP) in 2023 was 0.2% compared with 2022, against the increase of 5.3% in 2022 (constant average prices of the previous year) (GUS, 2024B). A high rate of inflation (the consumer price index) reaching 16.6% in December 2022 was curbed to 6.1 % in December 2023 (GUS, 2024C).
- **Political situation:** The parliamentary election was held in Poland on 15 October 2023. A turnout reached an unprecedented 74 %, the highest in post-communist Poland. For the first time also, the turnout of voting women (74.7%) has surpassed that of men (73%). The right-wing Law and Justice (PiS) party, Poland's governing party since 2015, won the largest vote share, but was not able to secure the majority of seats in the Sejm. In consequence, a new governing coalition was formed by the liberal-centrist Civic Platform (PO – Platforma Obywatelska), Poland's governing party between 2007-15, the 'Third Way' (Trzecia Droga – an electoral coalition comprising the Polish Peasant Party (PSL) and a liberal-centrist newcomer 'Poland 2050') - and the New Left grouping. The new government was appointed on 13 December 2023. Still the President Andrzej Duda (supporting the Law and Justice party) holds power to veto legislative initiatives of the government, while the governing coalition parties have not enough votes to overturn presidential vetoes. This cohabitation will make it more difficult for the new government to execute its legislative priorities, including those concerning media and PSM and will most likely slow the fulfilment of its agenda until the end of the President Duda's term (June 2025).
- **Media Market:** The Polish news media landscape is composed of consolidated TV networks, declining but still influential newspaper groups, growing news portals and start-ups offering journalistic commentary, investigations, fact-checking and analysis. Advertising revenues increased in the internet sector by 8.4%, in the audiovisual sector by 4.1%, in the radio sector by 11.3% and decreased by 3.2% in the newspaper sector between January to June 2023 (wirtualnemedi.pl, 2023). While the press remains the most influential opinion-forming medium, it also struggles with a constant shrinking of

income from the sale and advertising. In 2023, a number of titles closed down or reduced the frequency of publication. On the other hand, some internet-based media were successful with alternative forms of funding (e.g. Radio 357 or news portal OKO.press). In 2023, a new news portal - I.pl was launched by the Polska Press group with a staff of 44 journalists and 7 million unique users as of July 2023. Some popular news and commentators' podcasts or talk shows function in a form of premium pay services, others offer investigative series or fact-checking for free, including non-profit factchecking portals Demagog.org.pl, Fakenews.pl and FrontStory.pl.

- **Regulatory Environment:** One of the principal development marking the end of 2023 was an attempt of the new government to fundamentally revamp PSM in Poland according to its electoral pledge of “depoliticization”, increase of social participation in the PSM and abolition of the National Media Council (RMN) (Koalicja Obywatelska, 2023). A new minister of culture Bartłomiej Sienkiewicz dismissed the Directors General, management of TVP, Polish Radio and Polish Press Agency (PAP), and replaced them with new nominees. The TVP's news channel TVP Info and TVP 3 were switched off for few days, while the TVP's English channel – TVP World interrupted programming for two and half months. Subsequently, the minister Sienkiewicz put Polish Television, Polish Radio and the Polish Press Agency into the state of liquidation. This solution, in his view, was to ensure the continued operation of the companies, the necessary restructuring and prevention of layoffs (Czurna, 2023).
- **COVID-19:** Post-pandemic consequences affect mainly economic conditions of the media in Poland and their sustainability. Particularly local media have faced growing post-pandemic economic pressure in the last few years, amplified by unfair competition from municipality media outlets and unfair distribution of state advertising.
- **War in Ukraine:** In 2023, Ukrainian language or Ukraine-related services continued to be provided by a number of private and public news outlets. These include “Ukrayina” news by gazeta.pl, “Ukraina” news by onet.pl “Vpolshchi.pl” by Wirtualna Polska, “Ukrayinskiy servis” by PAP and many others.

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

Poland: Media Pluralism Risk Areas



JS chart by amCharts



In 2023, risks decreased in three areas of an MPM analysis: **Market Plurality** (from 71% in 2022 to 68% in 2023), **Political Independence** (from 75 % in 2022 to 66% in 2023) and **Social Inclusiveness** (from 63% in 2022 to 57% in 2023). The risk in the area of **Fundamental Protection** increased to 56% (from 50% in 2022). Overall, the areas of **Fundamental Protection**, **Political Independence** and **Social Inclusiveness** stand for a medium risk, while an area of **Market Plurality** for a high risk.

Fundamental Protection

In 2023, an indicator on **Independence and effectiveness of media regulatory authorities** reached for the first time a high level risk scoring 70 %, thus also representing the highest risk in the area of Fundamental Protection. This mainly stems from a cumulative effect of several developments concerning the National Broadcasting Council (KRRiT), including a lack of regulatory transparency, sanctioning decisions targeting independent broadcasters, centralization and political control of decision-making and postponing of licence-granting procedures for some independent media outlets. The impact of these trends should be seen with regard to completed implementation of AVMSD (Directive 2018/1808) and forthcoming implementation of DSA and DMA that will extend KRRiT's competences in new areas of regulation, thus necessitating regulatory independence with a new urge.

The indicator on **Journalistic profession, standards and protection** stood at 50 % (a medium risk) in 2023 and detected a lowest level of risk in the Fundamental Protection area, reflecting a mix of satisfactory and hampering trends. Still, a highly and overtly criticised Article 212 of the Criminal Code, continues to be used in defamation cases against journalists and public activists. Despite political promises, no government has so far succeeded in changing this legal status quo, supported in view of some experts (e.g. Breguła,

2023) by a legal environment in Poland. At the same time, there were certain positive developments during 2023, such as announcements of legal changes aiming at restoring the rule of law, depoliticization of PSM and advances of Poland in Press Freedom Index. These translated mainly to decreased level of risk in the indicator on **Protection of freedom of expression** (51%).

Market Plurality

In the area of market plurality, the indicator with lowest score stood for **Transparency of media ownership** (50%) and with highest score for **Plurality of media providers** (88%). This distinction also points to importance of legal and regulatory safeguards in place. In the case of ownership transparency, the 2021 Act Amending 1992 Broadcasting Act (Ustawa o zmianie ustawy o radiofonii i telewizji) stipulated that audiovisual providers should make available information on beneficial owners in the Central Register of Beneficial Owners (CRBO) and on their websites. With legal obligations in place, disclosure of ownership data on media websites became much more common also in the case of outlets and companies not covered by the Act (e.g. Gremi Media publishing “Rzeczpospolita”, “Parkiet Gazeta Giełdy” or Wirtualna Polska Holding publishing wp.pl, money.pl). On the other hand, a high level of risk concerning **Plurality of media providers** stems from both a lack of media specific rules on ownership concentration as well as high levels of market and revenue shares of top media outlets.

Political Independence

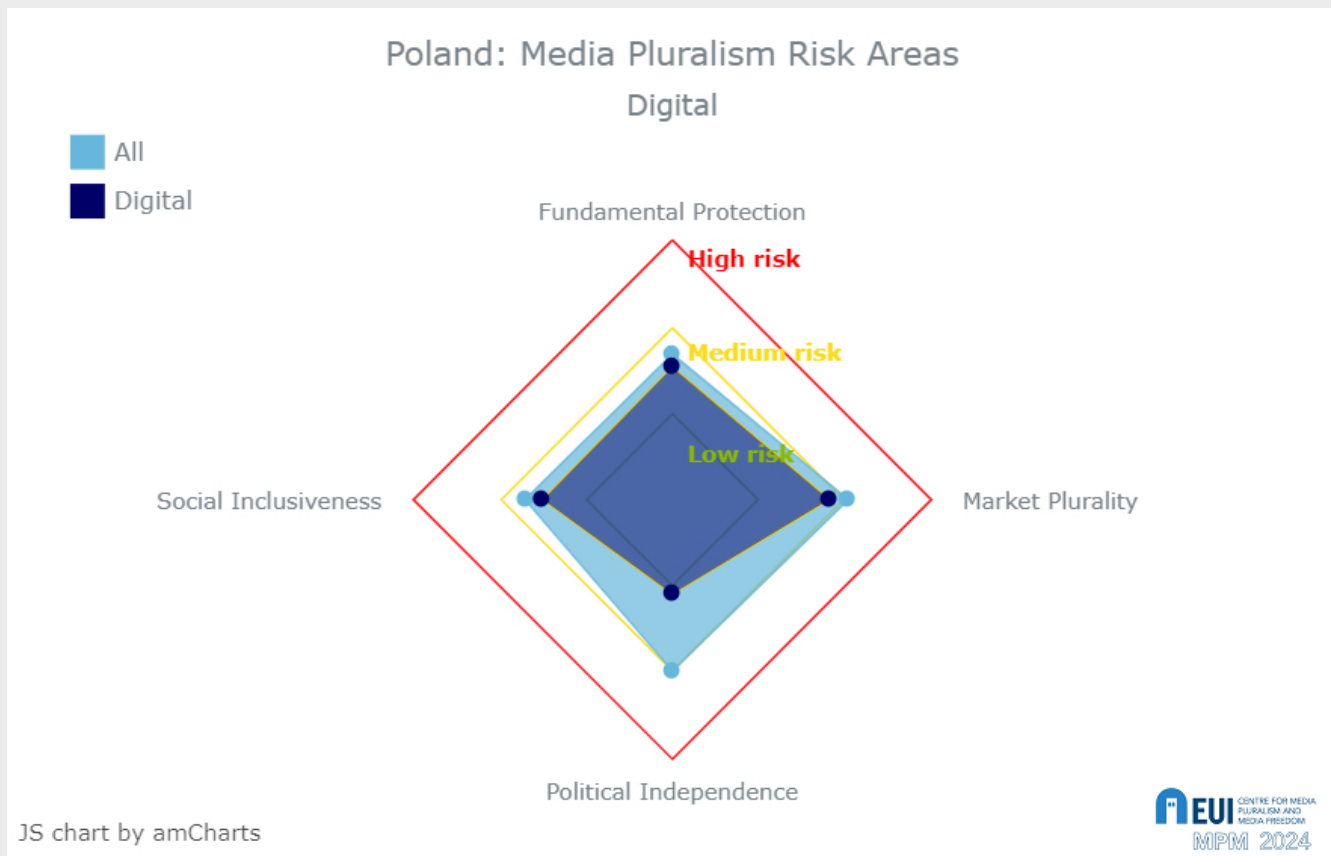
In the area of political independence, two indicators reached highest risk values - **Political independence of the media** (88%) and **Independence of PSM** (83%). The end of 2023 witnessed a fundamental revamping of PSM, following one of the electoral promises of the Civic Platform party – “depoliticization” and increase of social participation in the public media (Koalicja Obywatelska, 2023). While there has been a wide consensus about a necessity to reconstruct PSM, including its governing structures, a prompt replacement of boards by the new culture minister Bartłomiej Sienkiewicz met decisive criticism of oppositional parties, their supporters, and also some objections of CHR (Commissioner for Human Rights) and Helsinki Foundation of Human Rights (brpo.pl, 2023A). Reacting to President’s Duda rejection of budget funding for PSM, minister Sienkiewicz decided to dissolve PSM. Given existing legal constraints, the aim of this move was not the actual closure of the affected institutions, but restructuring and their continued operation (Lepiarz, 2023). Since then, both drafting of comprehensive media reform as well as experts debates have extensively taken place. There are several legal and policy projects elaborated by the governing coalition, academics and civil society organisations in place, yet it seems that a prompt processing of these has not been a government priority at the beginning of 2024.

The indicators on **Political independence of the media** (88%) and **Editorial autonomy** (75%) detected some lasting and some new attempts of political control. In 2023, politicians from the former governing party attempted to influence editorial decisions of news portals wp.pl (Wirtualna Polska holding) and onet.pl (RAS Polska) This led to a solidarizing initiative of 62 editors and editors-in-chief who signed a letter defending media independence in Poland and expressing their common commitment to “jointly and consistently inform the public about any attempt by the authorities to influence the media” (wp.pl, 2023). This rare example of editorial solidarity showed that also in the fragmented media environment there is a clear understanding of editorial autonomy and importance of collective action in defending it.

Social Inclusiveness

In the area of **Social Inclusiveness**, the indicator on **Representation of minorities in the media** scored a slightly higher risk (53%) than in the previous edition (49%). On the other hand, the indicator on **Local/regional and community media** decreased to 54% - a medium risk in 2023. As regards **Representation of minorities in the media**, one of the new problematic development observed in 2023 was a pre-election politicisation of immigration and portrayal of immigrant groups by TVP. Bulska and Winiewski (2023) observed that during the 2023 electoral campaign prejudice against ethnic, national groups and immigrants served as an instrument of political mobilization. The indicator on **Local/regional and community media** detected both problematic and positive developments. Growing post-pandemic economic pressure continued to affect particularly local media. At the same time, these organisations facing multiple challenges have succeeded in forming of networking: in October 2023 the National Local Media Cluster "Lokalsi" was established in order to represent local outlets in financial negotiations with platforms and collectively address economic and technological barriers (wirtualnemedi.pl, 2023B).

Focus on the digital environment



In the **Fundamental Protection Area**, several digital subindicators (e.g. on **Journalism and data retention** and **Protection of freedom of expression online**) pointed repeatedly to one key issue - a delay in implementation of the European Electronic Communication Code. In addition, critical voices from an NGO environment pointed out that numerous institutions in Poland are vested with wide-ranging powers as regards checking, recording conversations or, in general, access to information and communications data (Panoptikon, 2023).

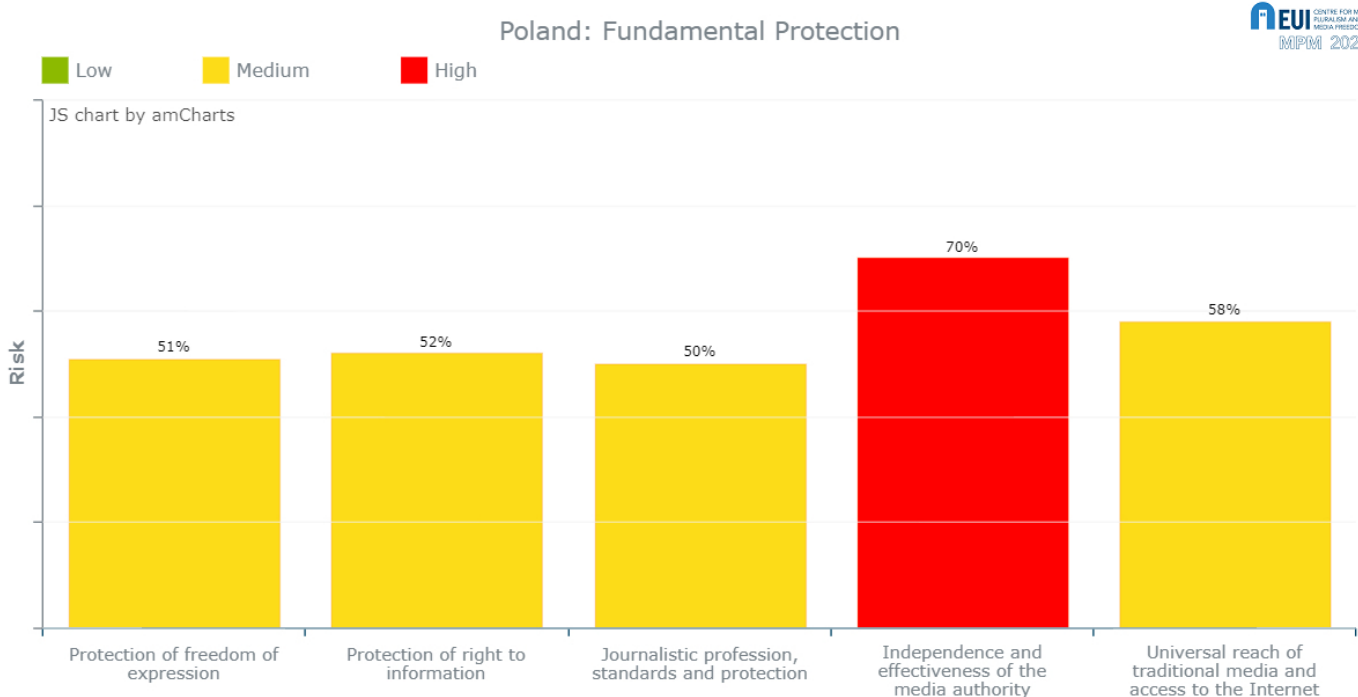
With regard to **Market Plurality Area**, the indicator on **Plurality in digital markets** (86%), continues to display a high risk. This stems mainly from a lack of competition measures that would recognise media specific criteria, or would include consideration of a gatekeeping role of digital platforms or news media dependency on platforms. This could eventually change with the implementation of DSA and DMA. But before that, the government needs to harmonise Polish law with the European Electronic Communications Code.

In the **Area of Political Independence**, the indicator on **Rules on political advertising online and on social media** reached a medium risk level - 56%. An absence of specific rules on political advertising online in the 2011 Electoral Code or 1992 Broadcasting Act has partly been compensated by internal rules adopted by very large platforms. At the same time, these do not assure a sufficient level of transparency particularly with regard to electoral spending.

An indicator that most significantly contributed to the risk decrease in the area of **Social Inclusiveness** was **Protection against disinformation and hate speech**. Both accidental and systematic disinformation campaigns continue to pose a significant problem in Poland, with a growth trends in some thematic areas – such as deteriorating relations between Poland and Ukraine (ies.lublin.pl, 2022; Zadroga, 2023). At the same time, policy and regulatory measures against disinformation remain relatively fragmented (Kupiecki, Bryjka and Chłoń, 2022). It is important to add in this context that EU efforts counteracting disinformation, and particularly DSA and DMA generate an important stimulus at the national level, for the government and other relevant state actors. As regards protection against hate speech, the catalogue of punishable forms of discrimination recognised by the Criminal Code (mainly Article 257) will most likely be extended in 2024. In January 2024, a new government has started to work on an amendment that will expand provisions to such grounds as gender, sexual orientation, gender identity, age and disability (Małacz, 2024). It is also important to add that extended protection against contents inciting hatred (e.g. Articles 47h, 47o1) was inserted in the amended 1992 Broadcasting Act in accordance with human dignity rules of AVMS Directive (Directive - 2018/1808).

3.1. Fundamental Protection (56% - medium risk)

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



The overall score for the area reached 56% (medium risk). The only high risk score was detected by the **Indicator on Independence and effectiveness of media regulatory authority** (70%). Other indicators scored a medium risk. The lowest level of the risk refers to the indicator on **Universal reach of traditional media and access to the internet** (50%) and **Journalistic profession, standards and protection** (50%).

A score of the indicator on **Protection of freedom of expression** decreased to 51%. Some positive developments could be observed in 2023, including announcements of legal and judicial changes aiming at restoring rule of law and depoliticization of PSM. Also, Poland witnessed an improvement of its position in 2023 Reporters Without Borders Press Freedom Index (rsf.org, 2023). Still, many problematic issues remain in place, including SLAPP, chilling effect of defamation cases. Several such cases were pending in 2023, including the case of Grzegorz Kosiński, the former publisher and editor-in-chief of the satirical website Czarna Owieczka.pl, who was convicted of criminal defamation (Article 212.2) for ridiculing a Member of Parliament (CoE, 2023). Also, the methods of PSM revamping have set off a wave of criticism, particularly from political opposition and human rights organisations. In view of CHR for example, the appointment of members of the PSM's management and supervisory boards directly by the government is unacceptable (Brpo.gov.pl, 2023A).

The indicator on **Protection of right to information** detected an increase from 46 % in 2022 to 52 % in 2023. The NIK's (Najwyższa Izba Kontroli – Supreme Audit Chamber) 2023 Report on "Sharing public information by government administration units" observed that although the audited authorities carried out most of their obligations related to the provision of public information in accordance with the law and reliably, there were cases with two and a half year delays in responding to requests for public information or leaving applications unanswered (Dąbrowska-Cydzik, 2023). Also, In 2023, CHR intervened in several

similar cases. One of them concerned a journalist, who was not allowed to enter the Sejm building even though he had a valid press ID. The legal basis for such an action was not provided (brpo.gov.pl, 2023B). In 2023, there were no important updates on the situation of whistleblowers' protection. In March 2024, the government finally approved the tenth version of the 2021 Draft Act on the protection of persons who report breaches of law (The Governmental Centre for Legislation, 2021), which signals that the draft law will most likely be legally proceeded through in 2024.

In comparison with the previous year, the risk under the indicator on **Journalistic profession, standards and protection** increased slightly from 48% to 50%. No journalists were killed in Poland in 2023. Yet, some attacks or threats to the physical safety of journalists occasionally happen. These include verbal attacks, crowd threats, physical beating and also destroying journalistic property and materials. For example, during a protest in Warsaw on July 2023, police officers arrested a freelance photojournalist and prevented him from documenting events (CoE, 2023). A high number of SLAPP cases remains a serious problem. SLAPP doesn't only challenge media outlets in financial terms, it also exerts a chilling effect on press freedom, and makes everyday life of investigative journalists much harder (see e.g. Grzegorz Kosiński described above). In this regard, a situation of local media is particularly vulnerable (Vanevska, 2024) as they face "financial and distribution troubles, legal threats, and uneven competition against media backed by public authorities" (Media Freedom Rapid Response, 2023).

The indicator on **Independence and effectiveness of the media authority** marked another increase up to 70% in 2023 and reached a level of high risk. This growing trend mainly stems from evidence pointing to a lack of regulatory impartiality and transparency. In 2023, KRRiT imposed significant fines on three independent broadcasters, including a record financial sanction on Radio Zet (476,000 PLN) for reporting about the circumstances of the President of Ukraine's passage through the Polish territory. In 2023, the KRRiT Chairman has taken repeatedly decision to control access to KRRiT data and hold undisclosed meetings. In view of some experts, these actions stood in contrast with Article 61 (guaranteeing access to public information) of the Polish Constitution (Radkowski, 2023). The lack of regulatory independence and transparency has also been visible in KRRiT's inactions, particularly as regards KRRiT's indifferent attitude towards attacks by politicians on journalists, and PSM's bias. Finally, it is also worth to add that KRRiT's Chair expressed his concern over the draft of EMFA and "its influence on freedom of speech" (Świrski, 2023).

A risk level measured by the **Indicator on Universal reach of traditional media and access to the Internet** increased to 50% in 2023 mainly due to the fact that the previous data source - DESI indicators – were replaced with data from Eurostat, and consequently impacted overall risk calculation with a highest significance in the case of subindicators on broadband coverage and internet access. As regards net neutrality, the UKE's 2023 report on compliance in the Polish market with Regulation 2015/2120 on open internet access (UKE, 2023B) observed a visible improvement of the situation, particularly as regards traffic management practices. Yet despite the improvement in most of the areas, transparency remained problematic.

Focus on the digital environment

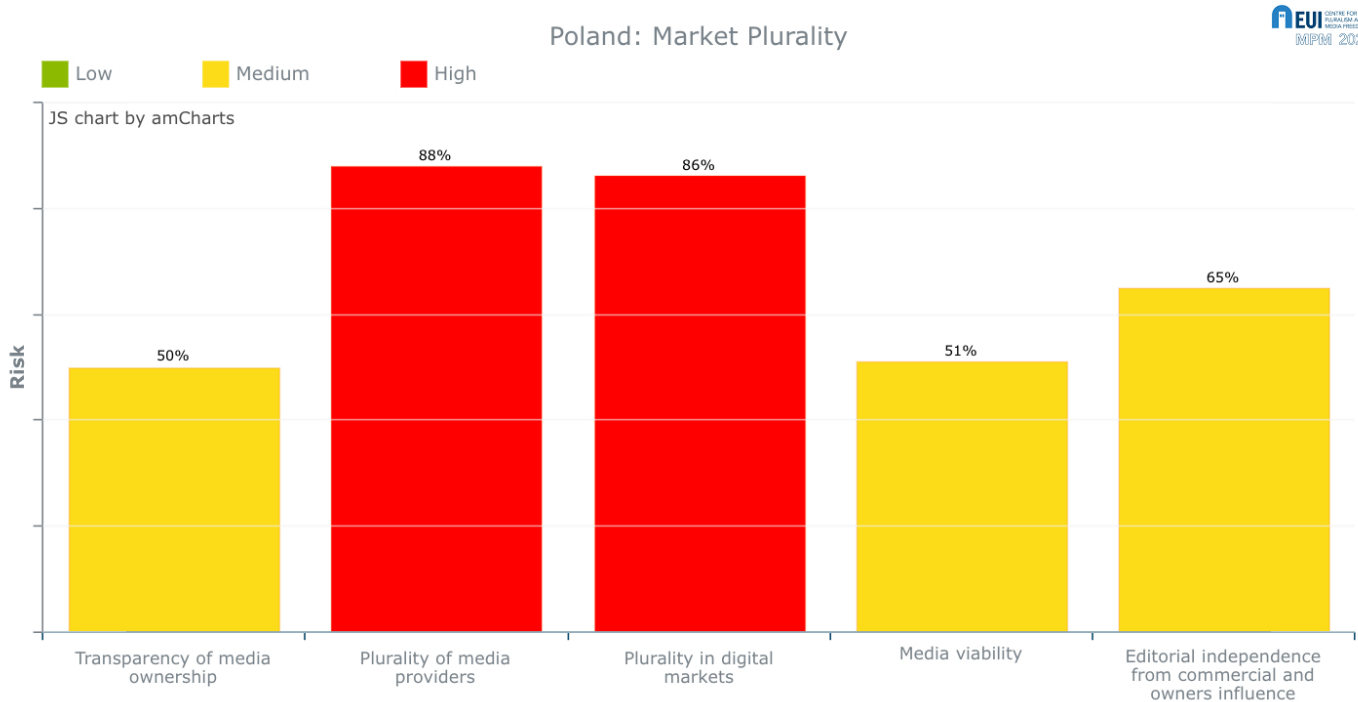
The subindicator on **Guarantees for FoE online** scored a medium risk at 50%. While the state has generally refrained from filtering or blocking online content in an arbitrary way, in April 2023 CHR addressed a problem of repetitive blockades of websites reported by a significant number of citizens. According to CHR, the scale of these complaints was so considerable that it justified an action from CHR (brpo.pl, 2023C). Throughout 2023 largest platforms have increased transparency in terms of sharing more clearly their content policies with users. Still, the quality of transparency, mainly as it comes to updated data on content removals (numbers, justifications) and other restrictions remains surprisingly low.

In a similar vein, the subindicator on **Digital safety indicated** a 50% medium risk. In May 2023, six Polish news outlets were targeted in distributed denial-of-service (DDoS) attacks, which destroyed their websites and left readers unable to access news for several hours. Among the media affected were the newspapers Super Express, Gazeta Wyborcza and Rzeczospolita; the best-selling weekly magazine Polityka; as well as the news websites wPolityce and Niezależna, all representing a mix of editorial lines (CoE, 2023).

The subindicator on **Journalism and data protection** revealed a 33 % risk level. As Poland has not implemented yet the European Electronic Communication Code, most relevant aspects of data retention are part of GDPR legislation and other laws specifying conditions under which data are retained (e.g. telecommunication law, police law and others).

3.2. Market Plurality (68% - 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 overall score for the area shows 68 % (high risk). As in the last year, the highest risks were detected in concentration-related indicators: on **Plurality of media providers** (88 %) and **Plurality in digital markets** (86 %). The lowest risks were measured for the indicators on **Media viability** (51 %) and **Transparency of media ownership** (50 %), both reaching a medium risk level. **The indicator on Editorial independence from commercial and owners influence** showed medium level risk reaching 65%.

The indicator on **Transparency of media ownership** scored the same level of risk as in the last year - 50 %. The 2021 Act Amending 1992 Broadcasting Act (Ustawa o zmianie ustawy o radiofonii i telewizji) stipulated that audiovisual providers should make available information about beneficial owners in the Central Register of Beneficial Owners (CRBO) and on their websites. The public bodies are well-informed about news media ownership, the access improved also for the public, however in some cases quite specific knowledge is required to access the data. In practice there are differences between media companies: audiovisual providers generally publish necessary data on company's websites, while other outlets opt for more diversified approaches. As of 2023 for example, following publishers and owners shared relevant information on their websites: Agora ("Gazeta Wyborcza", Radio ZET, Radio TOK FM), Gremi Media ("Rzeczpospolita", "Parkiet Gazeta Gieldy"), Polsat Group (2023), WP Holding (WP.pl, Money.pl).

As in last few years, the indicator on **Plurality of media providers** reached one of the highest scores among all of the indicators – 88%. This situation results from high levels of ownership concentration in media sector markets on the one side, but also from the implementation of competition law on the other. In 2023, the Appeal Court ultimately overturned the decision of a competition regulator UOKiK blocking a

takeover of Eurozet company by Agora in 2021. As a result, Agora completed the takeover of the company in 2023 (agora.pl; 2023). Audience concentration reached 76 % among audiovisual media owners and 89% among radio owners in 2022 (KRRiT, 2023). Similarly high was concentration on a national daily market reaching 81% in 2022 (Polskie Badania Czytelnictwa, 2023).

The indicator on **Plurality in digital markets** detected a slightly higher risk than in the last year – 86%. This was caused by a combination of scores of digital subindicators, but also a lack of publicly available data. The digital subindicator on Competition enforcement reached a high level of risk – 83%. The main reason is that existing legal measures do not recognise media specific criteria, nor do they include consideration of gatekeeping role of digital platforms or news media dependency on platforms. This could eventually change with the implementation of DSA and DMA. But before that, the government needs to harmonise Polish law with the European Electronic Communications Code, and complete the secondary legislation implementing the Electronic Communications Law. As of January 2024, Polish media industry hasn't reached a binding agreement with digital platforms on copyright issues. Also, Poland hasn't implemented yet the Copyright Directive UE/2019/790. Polish media continue to hold talks with intermediaries on fragmented manner, some of them joining a Google Showcase programme (spidersweb.pl, 2023).

The indicator on **Media viability** scored 51 % denoting a medium risk – a slightly lower level than in the last year. In general, economic situation remains volatile, while media revenues stabilised in most sectors. Advertising revenues increased in the internet sector by 8.4%, in the audiovisual sector by 4.1%, in the radio sector by 11.3% and decreased by 3.2% in the newspaper sector between January to June 2023 (wirtualnemedi.pl, 2023). Local media have been particularly vulnerable vis-à-vis unfair competition from municipal “media”, Polska Press chain of local outlets and uneven flows from state advertising. A sign of positive development came with the establishment of the National Local Media Cluster "Lokalsi" in October 2023. The initiative gathers several dozen small publishers producing around 70 local outlets reaching around 8.5 million unique users. The network's main aim is to represent local outlets in financial negotiations with platforms and collectively address economic and technological barriers (wirtualnemedi.pl, 2023B). As observed in the last year, some newspapers managed to generate large portions of subscribers of their online editions. Some internet-based media were successful with alternative forms of funding. For example, the 357 radio has been supported by 51,377 paying patrones at the beginning of 2023 (radio357.pl, 2023). A successful investigative portal OKO.press was supported in 2023 with more than EUR 530,000 from its users, which is 56.5% higher than the amount received last year (thefix.media, 2023). Some news and commentator-based podcasts or talk shows were successfully offered in 2023 as “premium subscription services”. These included onet.pl's political commentators talk show “Stan wyjątkowy” (State of emergency). In 2023, a new news portal - l.pl was launched by Orlen Press with a staff of 44 journalists and 7 million unique users as of July 2023.

The risk measured by the indicator on **Editorial independence from commercial and owners influence** reached 65 %. Commercial influence on the editorial content has been more subtle, and less discussed openly by journalists and media themselves than was the case of political influence. It is important to stress that relevant legal and self-regulatory measures lack explicit provisions enabling disclosure of conflict of interests concerning media owners. Advertorials are not explicitly prohibited in the 1984 Press Act, but there are rules concerning “hidden advertising” (e.g. Article 12(2) of the 1984 Press Law Act). In 2023, Daniel Obajtek, a former Orlen CEO, decided to stop distribution of a satirical magazine "NIE" by Orlen sales points on grounds of its cover illustration. The picture showed John Paul II leaning on a crosier with a baby doll crucified on it. The cover referred to the Pope's reported lenience concerning acts of paedophilia. Daniel Obajtek claimed that there is no room for press titles that destroy the authority of Saint John Paul II

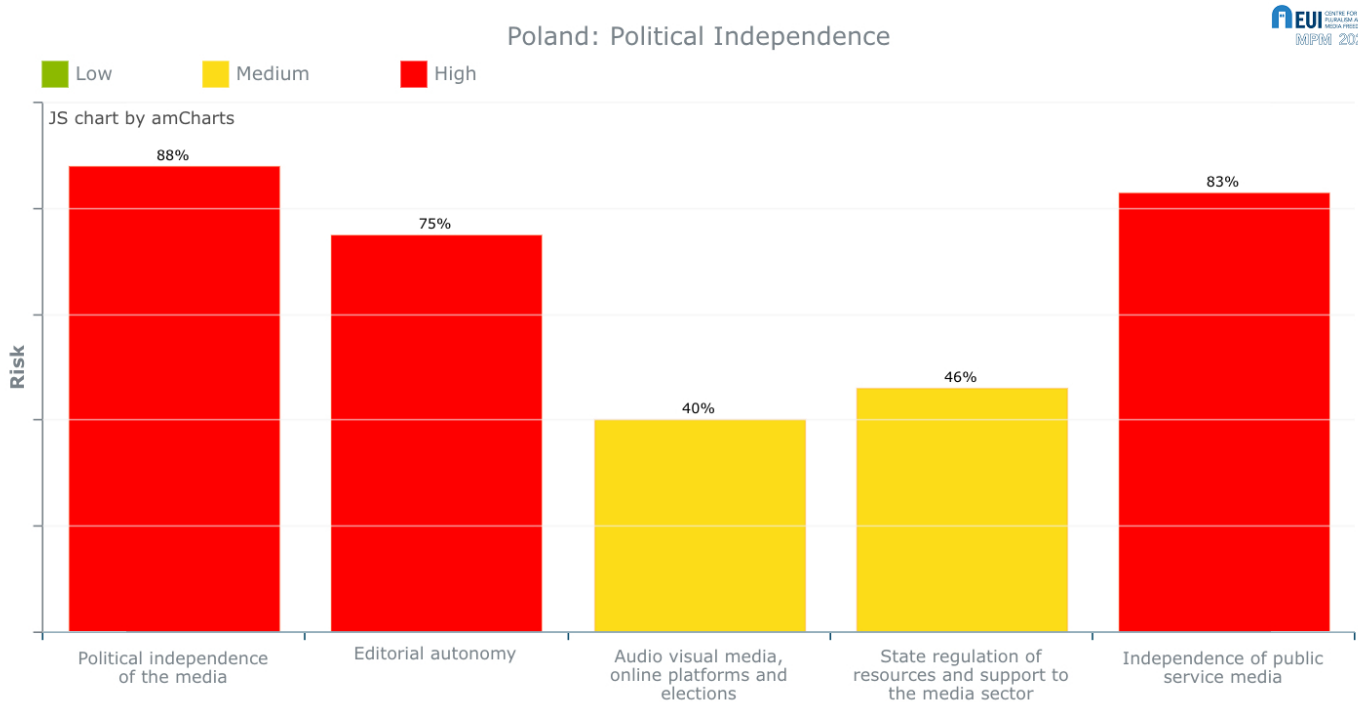
Focus on the digital environment

Risk levels of digital subindicators on **Disclosure of media ownership of digital news media** (25%) and **Transparency of ultimate ownership of digital news media** (75%) mirror the scores of other indicators composing Transparency of media ownership. Only digital media that eventually fall under the definition of broadcasters, providers of audiovisual media services or video-sharing platforms are covered by relevant provisions of the 1992 Broadcasting Act (Articles 14a, 47c or 47m) requiring publication data on beneficial owners. Yet there is no requirement to disclose information on ultimate owners.

A high risk score on **Horizontal concentration (digital native)** – 75% is caused by a lack of publicly available data and therefore difficulty to determine audience share or a level of concentration of top news online providers. The data on users' visits show repeatedly the domination of five actors and groups: Google, Meta Platforms, RAS Polska (the owner of onet.pl news portal, Wirtualna Polska holding (the owner of the news portal wp.pl) and recently, also allegro.pl (the owner of e-commerce site allegro.pl) (gemius.pl, 2023).

3.3. Political Independence (66% - 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.



An overall score for the area of **Political independence** decreased from 75% in 2022 to 66% in 2023. This change, moving the area to a medium risk band, mainly stemmed from a combination of indicators some of which detected lower risk levels than in the last year. Two indicators with constantly high values include **Political independence of the media** (88%) and **Independence of PSM** (83%). The lowest level of risk was detected by the indicator on **Audiovisual media, online platforms and elections** (40% – medium risk level). The indicators on **Editorial autonomy** and **State regulation of resources and support to the media sector** reached 75% and 46% of risk, respectively.

A relatively high score of the indicator on **Political independence of the media** (88%) reflects both regulatory conditions and practice. Relevant regulatory safeguards limiting political control over media outlets in Poland (e.g. limits on control of media by politicians) are missing. So are the rules on conflict of interests between owners of media and the ruling parties, partisan groups or politicians. Moreover, lack of legal rules is not compensated by effective self-regulation. As regards practice, in 2023 journalists and editors had to face an overwhelming number of legal actions initiated by politicians affiliated with the former ruling alliance, including government ministers, state-owned companies, and even the public broadcaster (Media Freedom Rapid Response, 2023). A pre-election period proliferated with verbal attacks of politicians intimidating journalists. The former governing coalition leader Jarosław Kaczyński called a TVN24 reporter "a representative of the Kremlin" and the former deputy defence minister, Wojciech Skurkiewicz, suggested that a number of journalists "are subject to a certain Russian influence in their activities" (CoE, 2023). A former PM Mateusz Morawiecki addressed TVN editors with following words: "you are spitting on everything that was sacred yesterday" (Radkowski, 2023). Critical news journalism was mitigated particularly in

regional media outlets belonging to Polska Press group (owned by Orlen), the tabloid Super Express and Polsat TV through a process named by experts “polsatization”. The term, derived from the proper name of TV Polsat, was coined to describe a particular type of owners’ control, manifesting in a soft media coverage avoiding criticism of authorities and often resulting in silence and self-censorship (Boczek, 2022). In addition, political control of PAP (Polish Press Agency) has been exposed by experts and PAP’s former employees some of whom claimed that internal censorship is comparable to one under communism and a level of control is similar as in the case of TVP and PR (Kowalczyk, 2023). In December 2023 however, the management and head of the agency changed with a primary aim to restore a PAP’s key mission – high quality journalism based on editorial independence. So far, PAP established the central newsroom introducing common editorial standards for the whole agency and offered jobs to some journalists dismissed under previous management (wirtualnemedial.pl, 2024).

The indicator on **Editorial autonomy** reached 75% of risk – the same high level risk as in the last year. Effective legal safeguards guaranteeing editorial autonomy are missing in Poland. There is no agreement within the journalistic community which organization and code of conduct would play a principal role when editorial autonomy comes under threat. This fragmentation is visible also in a newly established organisation – Polish Media Council (PMC – Rada Polskich Mediów). PMC was launched in October 2023 to address issues of media freedom and professional journalistic standards. The members include editors of the mainstream outlets such as Fakt, Gazeta Wyborcza, Newsweek Polska, Rzeczpospolita, Fakty TVN, Onet.pl, Radio RMF FM, and Wirtualna Polska. Still a number of newsrooms is missing, including Polsat, Super Express, Polska Press outlets, right wing media such as weekly Do Rzeczy, Gazeta Polska and TV Republika (Rada Polskich Mediów, 2024). This composition once again shows lasting polarisation and divides in the Polish news environment. During the last year, Polish media editors complained about high costs of independent journalism and various forms of pressure (Media Freedom Rapid Response, 2023). Chief editors of news portals wp.pl (Wirtualna Polska holding) and onet.pl (RAS Polska) were approached by politicians from a former ruling party who allegedly proposed state investment and editorial control (Czuma, 2023B; Sitnicka, 2023). After revelations in June 2023, 62 editors and editors-in-chief signed a letter defending the independence of the media in Poland and expressing their common commitment to “jointly and consistently inform the public about any attempt by the authorities to influence the media” (wp.pl, 2023). This rare example of editorial solidarity proved that despite fragmentation there is also a clear understanding of editorial autonomy and its red lines that cannot be crossed.

The indicator on **Audiovisual media, online platforms and elections** shows a medium risk, accounting for 40%. This reflects a mixture of methodological considerations and assessment concerning legal rules (particularly on electoral advertising and transparency of spending), the role of platforms and electoral coverage. Particularly, the last aspect detected higher risks. Audiovisual coverage of the 2023 electoral campaign on private channels was diverse and pluralistic, a tone of the coverage depended on the channel – some broadcasters offered more neutral coverage, others opted for a sharper stance. OSCE electoral monitoring has shown for example that news coverage on the private TVN devoted the government and ruling party 44 per cent of airtime, most of which was negative in tone (OSCE, 2023). Polsat’s coverage on the other hand was composed of 44 per cent of time devoted to the government and the ruling party, while 26 per cent was reserved to Civic Coalition, both mainly in a neutral manner (OSCE, 2023). Audiovisual coverage of the 2023 electoral campaign on TVP was highly partisan in its support of the ruling party and the government. From 8 August 2023 to 20 September, KRRiT received eight complaints from media users about TVP’s “Wiadomości” (The News) pertaining to political bias, unequal treatment of electoral parliamentary committees and favouritism of the ruling party (wirtualnemedial.pl, 2023). To fulfil its legal obligations, TVP organised an electoral debate involving all electoral committees on 9 October 2023.

However, the format of the debate did not allow for a meaningful exchange between the participants as four out of six questions were framed around referendum topics reflecting electoral priorities of the former governing coalition. Moreover, the structure of the debate did not allow politicians to discuss amongst themselves as two anchors used disproportionately long time to present and comment questions (around 25% of the whole debate) (Danielewski, 2023).

The indicator on **State regulation of resources and support to media sector** stood at the medium risk level – 46%. This assessment mainly results from a lowered risk detected for the implementation of spectrum allocation legislation, as well as from methodological reconsiderations. The 1992 Broadcasting Act provides relatively fair and transparent rules for spectrum allocation but these have not been implemented effectively by KRRiT in last three years. KRRiT has repeatedly delayed decisions on licences for TVN, TVN24, TOK FM, and others, “often waiting until the very last moment before confirming the licence” (Media Freedom Rapid Response, 2023). In 2023, there was however a smaller number of such cases than in previous two years. Apart from minority press that is supported on the basis of the 2005 Act on national and ethnic minorities and on the regional languages, no other media are eligible for systemic direct subsidies. Yet, relevant ministries support various media on grounds of specific projects schemes. In last few years there has been widespread criticism concerning unfairness and irregularities of these. In 2023, the magazine Press reported about a disproportionately large amount of subsidy (5.7 million PLN) awarded to the Independent Media Foundation, associated with a right-wing title "Gazeta Polska", supporting the former government (Kowalczyk, 2023). Other irregularities and manipulations were described in connection with the Government Programme for the Development of Civic Organizations (PROO) in priority 3 task - "Institutional development of local watchdog organizations and civic media" (magazynkontakt.pl, 2023). Finally, in the absence of media specific rules or policy that could guarantee or at least promote fair, non-discriminatory and proportional distribution of state advertising, streams of advertising from the government and other state actors, such as state companies, have increased during the 2020 – 2023. Analysing the dynamics of advertising expenditures of state-owned companies, Tadeusz Kowalski argues, that during the period 2015 – 2022, state-owned companies consequently avoided to locate their advertising expenditures to news media outlets without a government-sympathetic stance (Kowalski, 2022). In 2023, the Supreme Audit Chamber (NIK) investigated how state-owned companies and the foundations spend money on sponsoring and media activities. The audit showed that the expenditure of state-owned companies on media services increased dynamically in 2017-2021 and that a main media contractor for the audited companies was Telewizja Polska with 31.7 % share in the advertising cake in 2018, and 19.7 % in 2020. The second place was occupied Telewizja Polsat, whose share in the advertising cake reached 26.2 % in 2019 and 23 % in 2021 (press.pl, 2023). After election in 2023, media outlets that have been avoided by state advertisers shared their hopes for change and redirecting advertising according to “normal marketing criteria” without a "political ban" (wirtualnemedi.pl, 2023C). Jacek Ślusarczyk from Tygodnik Powszechny commented: “We hope that the practice of supporting the press favourable to the government with advertising revenue, will disappear forever” (wirtualnemedi.pl, 2023C).

The indicator on **Independence of public service media** remains one with the highest score – in 2023 at the same level as in 2022 - at 83%. Political influence has long hued PSM performance, while since 2016, PSM governance came under direct political control and coverage achieved unprecedented level of political partisanship. A significantly high bias marked PSM performance also during electoral coverage in September 2023. Not surprisingly, one of the electoral promises of Civic Platform was “depoliticization” and increase of social participation in the public media (Koalicja Obywatelska, 2023). Guided by commercial law, a new culture minister Bartłomiej Sienkiewicz dismissed directors general, management and supervisory boards of TVP, Polish Radio and the Polish Press Agency and replaced them with new nominees. The

changes brought a wave of protests by the PiS and staging a sit-in at TVP headquarters in support of pro-governmental journalists. The TVP's news channel TVP Info was switched off for few days, and the TVP's English channel TVP World interrupted broadcasting for two and half months. A new main news programme "19.30" was set to replace "Wiadomości" (The news). The anchor Marek Czyż explained during the first broadcast on 21 December 2023 that "No Polish citizen who finances the activities of public television has any obligation to listen to propaganda." Czyż also added: "Instead of propaganda soup, we want to offer you clean water". The broadcast had more than 4,5 million viewers. On 23 of December 2023, President Andrzej Duda announced his veto of the budget-related act for 2024, which included PLN 3 billion for PSM. President argued: "There can be no consent to this in view of the flagrant violation of the Constitution and the principles of a democratic state of law. Public media must first be repaired reliably and in accordance with the law". The culture minister Sienkiewicz decided to dissolve PSM three days later due to a lack of funds. Importantly though, the aim of this move was not the actual closure of the affected institutions, but restructuring and their continued operation (Lepiarz, 2023). Despite evident legal constraints and lack of President's support, the methods of PSM revamping have been criticised. The Helsinki Foundation for Human Rights stated for example that the government's takeover of public media "raises serious legal doubts" and may violate Council of Europe standards (Wądołowska, 2023). CHR observed that an appointment of PSM management and supervisory directly by the government is unacceptable and it does not matter whether it is based on the provisions of commercial company law (brpo.pl, 2023A). A draft for comprehensive media reform as well as experts debates are extensively taking place, yet a new media law will need the president's approval. In this situation it seems particularly important for PSM to restore its credibility and trust.

Focus on the digital environment

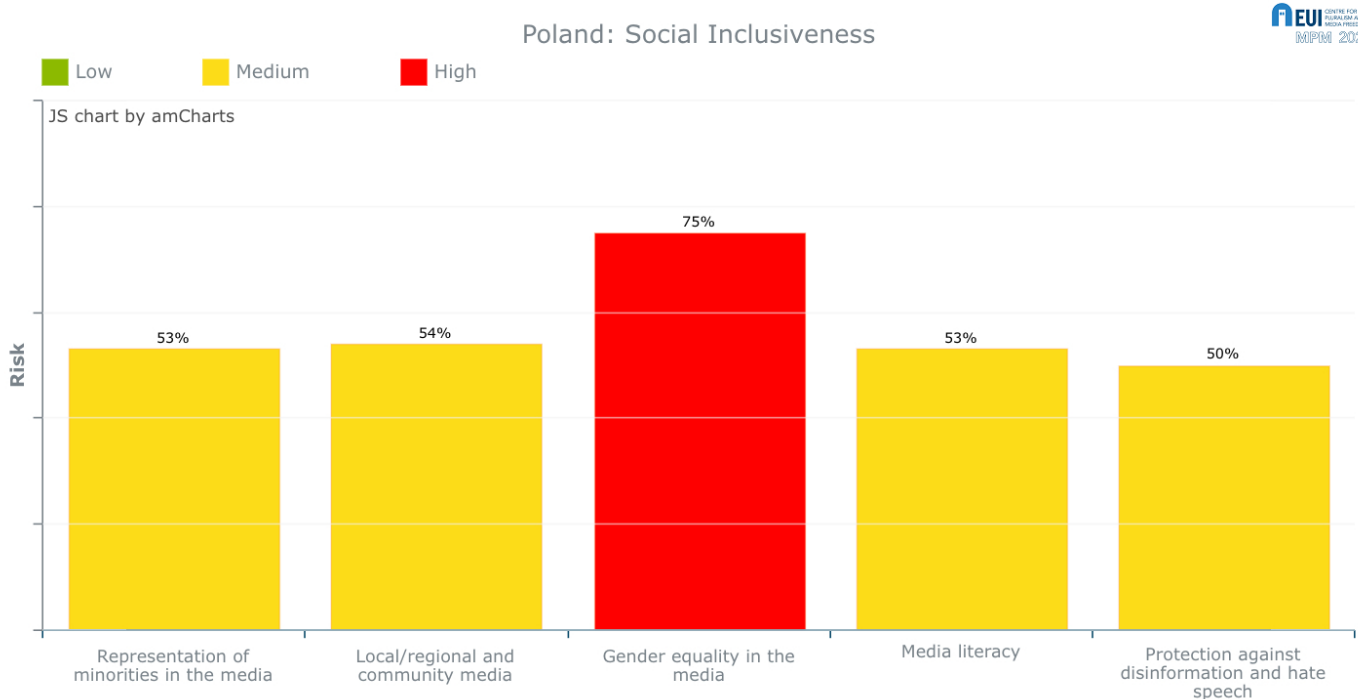
The subindicator on **Political control over native digital media outlets** scored 50 % - medium risk. While digital news media outlets have been less exposed to forms of political control than legacy media, in June 2023 chief editors of news portals wp.pl and onet.pl informed about meetings with politicians from the former governing party suggesting doing “a common business”, dismissing journalists who were unfavourable to the government, ensuring “that the government's point of view was represented” and that editorial activities should be “subordinated directly to the company's management” (Czuma 2023B; Sitnicka, 2023).

The subindicator on **Rules on political advertising online and on social media** reached a risk medium level - 56%. The 2011 Electoral Code or 1992 Broadcasting Act do not regulate specifically political advertising online. Very large platforms have developed their own rules on transparency of political actors that buy political or electoral advertising. In the case of Poland, these are described on Meta site under the service: Availability for ads about social issues, elections or politics (Meta, 2023). Google provides an explanation under: “Treści polityczne” (Political Content), tab “Zasady reklamowe” (Advertising Principles) (Google, 2023). Yet, a distinction between advertising and promotion is not always easy to establish. For example, one of the important problems of the last electoral campaign was insufficient transparency concerning events or politicians' activities on social media while separation between public positions held and campaigning was not sufficiently distinguished. Politicians from the governing party actively engaged on social media and digital platforms, sharing content from campaign events, reflecting on political developments, and promoting campaign promises (OSCE, 2023).

Finally, as regards the subindicator on **PSM funding for the online PSM mission**, the low level of detected risk is linked with the existence of provisions that guarantee funding for the online public service missions of the PSM, however it seems not entirely clear whether a generally-described remit would not potentially lead to distortion of competition with private media actors.

3.4. Social Inclusiveness (57% - 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 scores, similarly as in the last year, a medium risk (57%) with a lower risk for digital indicators (50%). The highest risk was detected for the indicator on **Gender equality** reaching 75% - a high risk level. The lowest level of risk was detected in the case of **Protection against disinformation and hate speech** (50%). Three other indicators - on **Representation of minorities in the media**, **Local/regional and community** and **Media Literacy** scored medium risk levels at 53%, 54% and 53% respectively.

The indicator on **Representation of minorities in the media** scored a slightly higher risk (53%) than in the previous edition (49%). One of the reasons is a double role played by PSM in terms of minorities access to their services. Officially recognized minorities enjoy legally guaranteed access to airtime. After a period of decreasing share of minority programming in 2015 – 2019 in TVP, the shares started to increase since 2020 and surpassed the level from 2015 in 2022 with a total of 213 hours (KRRiT, 2023). On the other hand, non-recognised minorities are rarely involved in a more systematic programming. TVP as the public broadcaster, particularly obliged to cater for cultural pluralism has offered insufficient content promoting multicultural dialogue. While services for the Ukrainian refugees certainly contribute to development of closer ties with the majority and deserve positive recognition, other immigrant minorities are being rarely served. Moreover, a topic of immigration and portrayal of immigrant groups has often been politicised by TVP. Bulska and Winiewski (2023) observed that during the 2023 electoral campaign prejudice against ethnic, national groups and immigrants served as an instrument of political mobilization. In view of the authors, a relatively high intensity of hate contents in the public service television has serious consequences: it can lead to social acceptance of hatred against strangers (Bulska and Winiewski, 2023).

The score for the indicator on **Local/regional and community media** decreased to 54% - a medium risk in 2023. This resulted from a combination of some problematic and some positive developments. In general, local areas are inadequately served by local and/ or community media. In last few years also, news media at the local and regional levels have faced growing post-pandemic economic pressure. This hardship is amplified by unfair competition from municipality media outlets, Polska Press regional monopoly, unfair distribution of state and local government advertising and increased number of law suits, threats and SLAPP aiming at silencing critical reporting. One of the positive developments manifests in a networking initiative: in October 2023 the National Local Media Cluster "Lokalsi" was established. The project gathers several dozen of small publishers producing around 70 local outlets reaching around 8.5 million unique users. A main aim of the network is to represent local outlets in financial negotiations with platforms and collectively address economic and technological barriers (wirtualnemedi.pl, 2023B).

The risk score for the indicator on **Gender equality in the media** increased from 67% to 75%, thus reaching a high risk level. PSM have no specific and comprehensive gender policies other than general employment rules. The share of women decreased from the last year both in PSM and private media governance boards. Relevant institutions (e.g. KRRiT) do not provide regulatory monitoring of women's representation in media coverage. Several reports offering partial accounts on the situation have shown that share of female experts in news and current programmes oscillates around 20 – 25 percent, while male experts around 80 – 75 per cent (IMM, 2023). It is worth to add that women's issues were highly exposed in 2023 electoral campaign. There is a ground to suggest that there was a higher representation of female politicians invited for the debates (still hard data are missing). Also – as regards the election, for the first time since 1989, the turnout of women surpassed the turnout of men and reached unprecedented 74.7%. A record 136 women were elected to sit in the Sejm which counts for 29.6% of the chamber's 460 MP's. This is still below the EU-wide figure of 32.7% (Ptak, 2023).

The indicator for **Media literacy** identified a medium risk – 53%. Media literacy activities seem to play an increasing role in Poland, they are also increasingly promoted by relevant institutions such as KRRiT, but still remain fragmented, not well co-ordinated and there is a lack of central and systematic approach that would result in practical and effective outcomes (Nordicom, Media&Learning, 2021; Cicha et al., 2021; Leonowicz-Bukała, 2022). Media literacy projects in Poland have been mainly designed and implemented by grassroot, civic organisations, NGOs, and educators. Such examples include: a manual "EDUKACJA MEDIALNA – zasady funkcjonowania w świecie nowych mediów (Media Education – principles of functioning in a world of new media)" (Cymanow Sosin, 2023); Edukacja medialna wyzwaniem XXI wieku (Media Literacy – a challenge for XXI century) – (<http://www.edukacjamedialna.pl/news.php>); Edukator medialny [blog] (The blog: media educator) – (<http://edukatormedialny.pl/>) and many others. While the role of the KRRiT (National Broadcasting Council) has certainly strengthened (also following AVMS Directive implementation), the regulator hasn't gone far enough in using its potential for initiating a more substantive turn towards concrete actions, including curricular development and greater involvement of PSM. There is also a question to what extent media literacy should focus on threats and risks such as disinformation campaigns, or rather address educational needs in a more complex manner including development of individual skills and capabilities that can help media users of all ages to make the most of their media consumption and at the same time avoid dependency on smartphones and social media. Still, the burden of media literacy and media education seem to be carried by individual teachers, passionate activists and parents.

Focus on the digital environment

The indicator on **Protection against disinformation and hate speech** detected a medium risk accounting for 50%. This result reflects some remaining problems and positive developments compared to last year. Both accidental and systematic disinformation campaigns pose a high risk and serious problem in Poland. In 2023, risks stemming from disinformation have increased mainly as regards disinformation on Russian aggression against Ukraine, Israeli-Palestinian conflict, domestic and EU politics, migration and climate issues (Konkret24, 2023). The 2023 EU DisinfoLAB observed that “narratives supporting or justifying the Russian invasion are pretty common” and that “they are intended to warm the image of Russia and show that the war is waged for a good purpose” (Zadroga, 2023). In 2022 and 2023, Russia has been conducting an intensive propaganda and disinformation campaign aimed at deteriorating relations between Poland and Ukraine (ies.lublin.pl, 2022). Anti-Ukrainian narratives were also shared by far-right politicians who launched an action on X (formerly Twitter) called #StopUkrainizationOfPoland (Zagroda, 2023). Policy and regulatory measures against disinformation remain relatively fragmented (Kupiecki, Bryjka and Chłoń, 2022). The government’s role has mainly focused on addressing disinformation from the perspective of national security. It is important to add that in this context, EU’s efforts counteracting disinformation, and particularly newly adopted DSA stand for important stimulus at the national level, particularly for the government and other relevant state actors. Many useful activities are carried out by NGOs, fact checking organisations or research institutes (e.g. Demagog, Panoptykon, OKO.press, CAPD, Warsaw Think Tank, NASK and many others), including educational podcasts, handbooks, thematic analyses, reports and monitors of disinformation.

Legal safeguards against hate speech are based on constitutional provisions, Criminal Code and 1992 Broadcasting Act. Hate speech is not explicitly prohibited by the Constitution which provides general anti-discrimination provisions and protection against parties and organisations eventually disseminating hate speech. The Criminal Code prohibits and punishes various forms of incitement to hatred (e.g. Article 257), but the catalogue of punishable forms of discrimination includes only “national, ethnic, racial or religious” differences, and does not recognise explicitly other relevant grounds. Since January 2024, a new government has started to work on an amendment that will extend provisions to gender, sexual orientation, age and disability (Małacz, 2024). It is also important to add that extended protection against contents inciting hatred (e.g. Articles 47h, 47o1) was inserted in the amended 1992 Broadcasting Act in accordance with human dignity rules of AVMS Directive. One of the remaining weaknesses is insufficient monitoring of hate speech incidents. There are serious gaps in the data provided by relevant state bodies to international institutions (FRANET, 2022). Some reporting is provided by CHR (brpo.pl, 2023D) and NGOs, including the Center for Monitoring Racist and Xenophobic Behaviour and the organization Nigdy więcej (Never Again). One of the most recent incident concerns Jan Pietrzak, a satirist and conservative commentator. Pietrzak spoke on the EU’s draft migration pact on a right-wing internet TV Republika. He mentioned that Poland has “barracks for immigrants in Auschwitz, Majdanek, Treblinka, Sztutowo,” referring to former Nazi-German concentration and death camps, and added “We have a lot of barracks built here by the Germans. And there we will keep these immigrants, illegally forced on us by the Germans”. Pietrzak words caused shock. Poland’s justice minister Adam Bodnar asked prosecutors to investigate hate remarks. Pietrzak comments were also condemned by the Auschwitz Museum and President Andrzej Duda’s chief of staff (Tilles, 2023).

4. Conclusions

In MPM2024, the risks to media pluralism increased only in the area of Fundamental Protection and decreased in all other areas: Market Plurality, Political Independence and Social Inclusiveness. Overall, the areas of Fundamental Protection (56 %), Social Inclusiveness (57 %) and Political Independence (66%) detected a medium risk, while the areas of Market Plurality (68 %) a high risk. Digital indicators reached lower scores in all of the areas: Fundamental Protection (51%), Market Plurality (61%), Political Independence (36%) and Social Inclusiveness (50%) and stood for a medium risk.

In 2023, the news media environment in Poland has been affected by both stability and uncertainty as regards economic trends, fundamental changes in political environment and policy shifts signalling restoration of rule of law. As regards regulatory developments, one of the greatest challenges will be accomplishment of PSM revamping with adequate legal grounding. So far appointment and management changes targeted mainly high level of partisanship in news provision. Major regulatory implementations are awaiting finalisation in 2024, including the European Electronic Communications Code, Copyright and Whistleblower Directives. KRRiT's performance denoted a lack of regulatory transparency and impartiality, particularly with regard to sanctioning decisions targeting independent broadcasters and delays in licence-granting procedures. Structural and institutional polarisation continues to mark the news media in Poland, including coverage, political orientation of news media outlets and also attempts to establish new representative organisations such Polish Media Council. The revenue trends have stabilised for some sectors (online, TV and radio), while the press continues to strive with loss in sales. Ownership concentration remained particularly high in audiovisual and radio markets, but dominant position of certain online actors became an issue as well, particularly with respect to insufficient transparency or lack of publicly available data on market and audience shares. Polish journalists and editors experienced political pressures (e.g. wp.pl and onet.pl case), SLAPP and defamation cases, as well as many other difficulties (economic uncertainties, lack of collective support, multi-tasking, mobbing). These combined challenges make every-day journalistic routines increasingly demanding.

The highest and systematic risk in the area of **Fundamental Protection** stands for a lack of functional independence of the media regulatory authority that may extend to platform regulation in a close future. Structural issues embrace also legal actions addressing journalists and newsrooms, while problems with access to public information happen occasionally.

These risks may be mitigated by:

- ensuring that a media regulatory authority (KRRiT) performance is conducted in accordance with principles of effective independence, regulatory impartiality, full transparency and accountability, in order to avoid political and other undue influence on policymaking, preferential or discriminative treatment of media actors or services,
- taking into account growing importance of platform regulation, and thus a necessity of a close co-operation between a media regulatory authority (KRRiT) and other regulators - competition authority (UOKiK), National Media Council (RMN) and telecom authority (UKE),
- strengthening legal protection of journalists and newsrooms particularly against attacks, including digital, SLAPP and other legal threats; supporting an enabling environment for freedom of expression and legal certainty for media workers and the media industry, as well as public awareness on values of

professional journalism,

- supporting institutional change in building a common front/organisational structure among newsrooms and journalists to effectively respond to unjustified criminalization of defamation, threats and legal actions against journalists and other forms of pressure; strengthening professional resilience and building lasting relationship with users.

A number of risks in the **Market Plurality** area results from external factors, but also from policy responses at the level of national politics. The risks include high ownership concentration, growing economic dependency on platforms, limited public access to market data, vulnerabilities of regional and local media, the role of state as owner, advertiser and subsidiser, and lack of safeguards protecting journalism against commercial influences.

Thus, the risks in the **Market Plurality** area can be addressed by:

- setting clear, complex and high standards (such as conflict-of-interest rules) on state's involvement in a news media market and operations, including media ownership by state institutions; transparent and fair allocation of state advertising; clear, fair and transparent rules for state support to the media such as direct and indirect subsidies, grants and other forms of support,
- setting editorial policies and rules for state-owned news media ensuring editorial independence and an effective prevention of confluence of commercial and political influence,
- improving and ensuring an open and inclusive public's access to the most up-date news market data (such as advertising revenues), digital platform revenues and data resulting from platforms' content management policies,
- development of support schemes for independent local and regional news providers; designing tax policies that will not put additional financial burdens on media providing original news content, but rather support them,
- establishing effective rules that could combine assessment of ownership concentration with impact on pluralism of opinions and views in a news media market and better reflect specific features of converged digital environments, including a 'gatekeeper' function of platforms.

In the area of **Political Independence**, a major risk was generated by political control and instrumentalization of PSM and after the PSM governance change, by unfinished reform requiring legal grounding. Other weaknesses include an absence of relevant regulatory safeguards limiting political control over media outlets, cases of direct political pressure on editorial staff, asymmetric and non-proportional distribution of state support and state advertising, and forms of political pressure in local and regional market, including unfair competition from municipality media.

possible response to these risks may focus on:

- complex revamping of PSM, including: a governance model reflecting a wide spectrum of social representation and independence from political control; editorial independence and autonomy; high standards of PSM remit generating public value and guided by detailed rules on impartiality, accuracy and quality as well as adopting effective monitoring of PSM performance by relevant regulators,
- adopting effective rules for fair, non-discriminatory and transparent distribution of state support and state advertising for the news media, including digital natives and online providers,
- relating state or public support for the news media with values of public interest, original news content and high quality journalism,
- developing better self-regulatory and widely respected standards concerning editorial independence, conflict-of-interest rules between political actors and news media.

In the area of **Social Inclusiveness**, risks were generated by a growing threat of disinformation and lack of a complex policy connecting activities of the government, NGOs, news media and platforms; insufficient monitoring of hate speech cases, inadequate access of non-recognised minorities to the media and weak and fragmented national policy on media literacy.

These risks may be addressed by:

- adopting a broader scope of measures addressing “hate speech” and implementing effective monitoring of cases, while improving access of the public to relevant data,
- supporting news media initiatives that target both legally recognized and non-recognized minorities, including Ukrainian refugees, foreseeing also forms of employment for minority journalists,
- developing a more systematic and comprehensive approach to media literacy, including formal curriculum and regular monitoring of media consumption and users’ digital skills and competences,
- legal and policy recognition of non-profit community media while respecting their independent status.

Finally, the quality of a pluralistic news media environment depends on an interplay between national, EU and international levels of regulation and governance. Sustainability of news media services will rely on regulating in a more transparent and fair way relations between news content providers and digital platforms.

5. References

The 2021 Act Amending 1992 Broadcasting Act (Ustawa o zmianie ustawy o radiofonii i telewizji) adopted on 11 August 2021, Official Journal, 2021, item 1676,

<https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20210001676>

The 2005 Act on national and ethnic minorities and on the regional languages (Ustawa o mniejszościach narodowych i etnicznych oraz o języku regionalnym), adopted on 6 January 2005, Official Journal 2005, No 17, item 141. <http://isap.sejm.gov.pl/DetailsServlet?id=WDU20050170141>

Agora.pl (2023) 14/2023 Conclusion of the Share Purchase Agreement to purchase 110 shares of Eurozet sp. z o.o. from SFS Ventures s.r.o. with its seat in Prague under Call Option 1,

<https://www.agora.pl/en/14-2023-conclusion-of-the-share-purchase-agreement-to-purchase-110-shares-of-eurozet-sp-z-o-o-from-sfs-ventures-s-r-o-with-its-seat-in-prague-under-call-option-1>

Breguła, Łukasz (2023) Dekryminalizacja zniesławienia. Analiza krytyczna. (Decriminalization of defamation. Critical Analysis),

<https://palestra.pl/pl/czasopismo/wydanie/9-2023/artukul/dekryminalizacja-znieslawienia.-analiza-krytyczna>

Brpo.gov.pl (2023A) Sytuacja w mediach publicznych. RPO Marcin Wiącek pisze do Ministra Kultury i Dziedzictwa Narodowego (The situation in public media. Ombudsman Marcin Wiącek writes to the Minister of Culture and National Heritage), <https://bip.brpo.gov.pl/pl/content/rpo-media-publiczne-sytuacja-potrzebna-nowelizacja-mkidn>

Brpo.gov.pl (2023B) Sprawy ważne dla obywateli: prawo dostępu do informacji publicznej (Matters important to citizens: right to access public information), <https://bip.brpo.gov.pl/pl/sprawy-wazne-dla-obywateli>

Brpo.pl (2023C) Obywatele skarżą się na blokowanie stron internetowych. Pismo RPO do premiera. Odpowiedź KPRM (Citizens complain about blocking of websites. A CHR letter to PM. Reply from PM's Chancellery), <https://bip.brpo.gov.pl/pl/content/rpo-internet-blokowanie-stron-premier-odpowiedz>

Brpo.pl (2023D) Mowa nienawiści (Hate speech) https://bip.brpo.gov.pl/pl/site-search?search_api_fulltext=mowa+nienawi%C5%9Bci

Bulska Dominika; Winiewski Mikołaj(2023) Media publiczne powinny...Treści nienawistne na antenie telewizji publicznej. Raport z monitoringu mediów publicznych w trakcie kampanii parlamentarnej w 2023 r. (Public media should....(Hate content on public television. Report on the monitoring of public service media during the 2023 electoral campaign), <https://otwarta.org/wp-content/uploads/2023/11/Media-publiczne-powinny...-raport-koncowy.pdf> .

Cicha, Karina et al. (2021) Digital and Media Literacies in the Polish Education System—Pre- and Post-COVID-19 Perspective, <https://www.mdpi.com/2227-7102/11/9/532/pdf>

CoE - Council of Europe (2023) Platform to promote the protection of journalism and safety of journalists: Poland, <https://www.coe.int/en/web/media-freedom/poland>

Czurna, Beata (2023A) TVP, Polskie Radio i PAP postawione w stan likwidacji (TVP, Polskie Radio and PAP put into liquidation), <https://www.wirtualnemedialna.pl/artukul/tvp-likwidacja-polskie-radio-pap>

Czuma, Beata (2023B) Wyznanie naczelnego Wirtualnej Polski wywołało burzę. "Czeka nas najtrudniejsze pół roku w historii mediów" (The confession of the editor-in-chief of Wirtualna Polska caused a storm. "We are facing the most difficult six months in the history of the media"), <https://www.wirtualnemedialna.pl/artukul/wirtualna-polska-sprzedaz-wladza-naciski-przejecie-kontrol-wywolalo-burza-historia-polski>

Cymanow Sosin, Klaudia (ed.) (2023) EDUKACJA MEDIALNA – zasady funkcjonowania w świecie nowych mediów (Media Education – principles of functioning in a world of new media), <https://depot.ceon.pl/bitstream/handle/123456789/23248/Kompendium%20-%20Edukacja%20medialna.pdf?sequence=1&isAllowed=y>

Dąbrowska-Cydzik, Justyna (2023) Na dostęp do informacji publicznej narzekają dziennikarze i organizacje

pozarządowe. "Nie działa" Journalists and non-governmental organizations complain about access to public information. "Doesn't work"), <https://www.wirtualnemedial.pl/artykul/brak-dostep-do-informacja-publiczna>

Danielewski, Michał (2023) Debata TVP. Hołownia bezapelacyjnie najlepszy, dobra Scheuring-Wielgus. Jak wypadł Tusk? (TVP debate. Hołownia is undoubtedly the best, good Scheuring-Wielgus. How did Tusk fare?), <https://oko.press/debata-tvp-holownia-bezapelacyjnie-najlepszy>

FRANET (2022) Franet National contribution to the Fundamental Rights Report 2022, https://fra.europa.eu/sites/default/files/fra_uploads/fundamental_rights_report_2022-poland.pdf

gemius.pl (2023) Zestawienia tematyczne i funkcjonalne - listopad 2023 (Thematic and functional lists - November 2023), <https://www.gemius.pl/reklamodawcy-aktualnosci/zestawienia-tematyczne-i-funkcjonalne-listopad-2023.htm>

Google (2023) Treści polityczne (Political Content) <https://support.google.com/adspolicy/answer/6014595?hl=pl>

GUS (2024A). Basic Data, <https://stat.gov.pl/en/basic-data/>.

GUS (2024B) Gross Domestic Product in 2023 Preliminary estimate. <https://stat.gov.pl/en/topics/national-accounts/annual-national-accounts/gross-domestic-product-in-2023-preliminary-estimate,1,13.html> .

GUS (2024C) Flash estimate of the consumer price index <https://stat.gov.pl/en/topics/prices-trade/price-indices/flash-estimate-of-the-consumer-price-index-in-december-2023,21,18.html>

GUS (2023A). Tablice z ostatecznymi danymi w zakresie przynależności narodowo-etnicznej, języka używanego w domu oraz przynależności do wyznania religijnego. <https://stat.gov.pl/spisy-powszechne/nsp-2021/nsp-2021-wyniki-ostateczne/tablice-z-ostatecznymi-danymi-w-zakresie-przynaleznosci-narodowo-etnicznej-jezyka-uzywanego-w-domu-oraz-przynaleznosci-do-wyznania-religijnego,10,1.html> .

GUS (2023B). Foreigners performing work in Poland in 2022. <https://stat.gov.pl/en/experimental-statistics/human-capital/foreigners-performing-work-in-poland-in-2022,12,1.html> .

IMM (2023) Media wciąż bez kobiet — wyniki badania IMM dla Forbes Women (Media still without women - IMM research results for Forbes Women), <https://www.imm.com.pl/media-wciaz-bez-kobiet-wyniki-badania-imm-dla-forbes-women/>

Koalicja Obywatelska (2023) 100 Konkretołów na 100 Dni (100 Concrete Things for 100 Days), <https://100konkretow.pl/praworzadnosc/>

Konkret24 (2023) Dezinformacja w 2023 roku. Pięć nowych trendów (Disinformation in 2023. Five new trends), <https://konkret24.tvn24.pl/polityka/dezinformacja-w-2023-roku-piec-nowych-trendow-st7653041>

Kowalski, Tadeusz (2022) OKRES RZĄDÓW ZJEDNOCZONEJ PRAWICY. Analiza wydatków reklamowych spółek skarbu państwa (SSP) w latach 2016-2021. Aneks. Wydatki reklamowe ministerstw i centralnych urzędów w 2021 roku. (The period of the United Right government. The analysis of advertising expenditures of state owned companies (SSP) in between 2016 – 2021. Anex. Advertising expenditures of ministries and central administration in 2021), https://www.researchgate.net/publication/359603356_OKRES_RZADOW_ZJEDNOCZONEJ_PRAWICY_A_naliza_wydatkow_reklamowych_spolek_skarbu_panstwa_SSP_w_latach_2016-2021_Aneks_Wydatki_reklamowe_ministerstw_i_centralnych_urzedow_w_2021_roku_na_podstawie_monitorin

Kowalczyk, Mariusz (2023) Fundacja związana z mediami Sakiewicza dostała kolejne miliony z budżetu (The foundation associated with Sakiewicz's media received further millions from the budget), <https://www.press.pl/tresc/76746.fundacja-zwiazana-z-mediami-sakiewicza-dostala-kolejne-miliony-z-budzetu>

KRRiT (2023) Informacja o podstawowych problemach radiofonii i telewizji w 2022 r. (Information about basic problems of radio and television in 2022), <https://www.gov.pl/web/krrit/sprawozdanie-i-informacja-z-dzialalnosci-w-2022-r>

Kupiecki, Robert, Bryjka, Filip; Chłoń Tomasz (2022) Dezinformacja międzynarodowa. Pojęcie rozpoznanie, przeciwdziałanie (International disinformation. Definition, diagnosis, counteracting)

https://scholar.com.pl/pl/glowna/8704-dezinformacja-miedzynarodowabrpojecie-rozpoznanie-preciodzialanie.html?search_query=dezinformacja&results=1

Leonowicz – Bukala, Iwona (2022) Edukacja medialna jest naszym prawem (Media literacy is our right), <https://wsiz.edu.pl/blog-naukowy/edukacja-medialna-jest-naszym-prawem/>

Lepiarz, Jacek (2023) Polish media conflict pits government against far right, <https://www.dw.com/en/polish-media-conflict-pits-government-against-far-right/a-67884162>

magazynkontakt.pl (2023) How Kontakt (didn't) get a grant from the National Freedom Institute, <https://magazynkontakt.pl/jak-kontakt-nie-dostal-grantu-z-narodowego-instytut-wolnosci/>

Matłacz, Agnieszka (2024) W MS rozpoczęły się prace nad przepisami o mowie nienawiści wobec osób LGBT (Work on the regulations on hate speech against LGBT people has started at the Ministry of Justice), <https://www.prawo.pl/prawo/mowa-nienawisci-dotyczaca-osob-lgbt-zmiany-2024.524986.html>

Media Freedom Rapid Response (2023) Media Freedom at a Crossroads: Journalism in Poland faces uncertain future ahead of election, <https://ipi.media/wp-content/uploads/2023/10/IPI-MFRR-Poland-media-freedom-at-a-crossroads.pdf>

Meta (2023) Availability for ads about social issues, elections or politics, <https://www.facebook.com/business/help/2150157295276323?id=288762101909005>

Nordicom, Media&Learning (2021) Media Literacy in Poland, <https://media-and-learning.eu/event/webinar-on-media-literacy-in-europe-poland/>

Pankowska, Marta (2023) Akt cenzury. Tygodnik "NIE" zniknie z Poczty Polskiej i Orlenu przez okładkę z papieżem (Act of censorship. The weekly "NIE" will disappear from Poczta Polska and Orlen because of the cover with the Pope), <https://oko.press/tygodnik-nie-zniknie-z-poczty-polskiej-i-orkenu-przez-okladke-z-papiezem>

Polskie Badania Czytelnictwa (2023). Rozpowszechnianie Tytułów Prasowych w 2022 r. (Distribution of press titles in 2022) https://www.pbc.pl/wp-content/uploads/2023/03/Raport_Audyt_PBC_2022.pdf

Press.pl (2023) Spółki skarbu państwa wydały ponad miliard zł na usługi medialne. Głównie w TVP i Polsacie (State-owned companies spent over PLN 1 billion on media services. Mainly on TVP and Polsat), https://www.press.pl/tresc/77387.spolki-skarbu-panstwa-wydaly-ponad-miliard-zlotych-na-uslugi-medialne_glownie-w-tvp-i-polsacie

Ptak, Alicja (2023) Record number of female MPs in Poland's parliament after elections, <https://notesfrompoland.com/2023/10/19/record-number-of-female-mps-in-polands-parliament-after-elections/>

Radio357.pl (2023) Co to znaczy, że Radio 357 jest finansowane przez społeczność? (What does it mean that Radio 357 is crowdfunded?), <https://radio357.pl/faq/ogolne/co-to-znaczy-ze-radio-357-jest-finansowane-przez-spolecznosc/>

Rada Polskich Mediów (2024) Rada Polskich Mediów, <https://radamediow.pl/>

Radkowski, Michał (2023) Kierował PAP, PFN i Redutą Dobrego Imienia. Teraz rządzi w KRRiT. Maciej Świrski zawsze blisko PiS (He headed PAP, PFN and Reduta Good Name. Now he governs the National Broadcasting Council. Maciej Świrski always close to PiS) [In] wirtualnemediaw.pl, <https://www.wirtualnemediaw.pl/artykul/kim-jest-maciej-swirski-krrit-pap-pfn-reduta-dobrego-imienia-pis>

Sitnicka, Dominika (2023) Naciski opisane przez Onet i WP to tłumienie krytyki prasowej. Czyli przestępstwo (The pressures described by Onet and WP include suppression of press criticism. That is, a crime), <https://oko.press/onet-wp-naciski-analiza>

Spidersweb.pl (2023) Wydawcy wystawiają rachunek cybergigantom. Od nowego rządu zależy, kiedy zostanie rozliczony (Publishers bill cyber giants. It is up to the new government to decide when it will be brought to justice), <https://spidersweb.pl/plus/2023/11/wydawcy-media-google-meta-pieniadze>

Świrski, Maciej (2023) Polskość to NORMALNOŚĆ - Wystąpienie Przewodniczącego KRRiT Macieja Świrskiego na 79. posiedzeniu Sejmu Rzeczypospolitej Polskiej (Polishness is NORMALITY - Speech by the

Chairman of the National Broadcasting Council, Maciej Świrski, at the 79th session of the Sejm of the Republic of Poland),

<https://www.gov.pl/web/krrit/wystapienie-przewodniczacego-krrit-podczas-79-posiedzenia-sejmu-rzeczpospolitej-polskiej>

Thefixmedia (2023) How Polish publisher OKO.press earned over half a million euros from readers' tax donations, <https://thefix.media/2023/11/16/how-polish-publisher-oko-press-earned-over-half-a-million-euros-from-readers-tax-donations>

Tilles, Daniel (2023) Justice minister orders investigation into TV commentator's "house migrants in Auschwitz" remarks,

<https://notesfrompoland.com/2024/01/02/justice-minister-orders-investigation-into-tv-commentators-house-migrants-in-auschwitz-remarks/>

UNHCR (2023). Ukraine refugee situation. <https://data.unhcr.org/en/situations/ukraine>

Vanevska, Katarzyna (2024), country focus: Poland, in Verza et al. *Uncovering news deserts in Europe. Risks and opportunities for local and community media in the EU*, https://cmpf.eui.eu/wp-content/uploads/2024/02/CMPF_Uncovering-news-deserts-in-Europe_LM4D-final-report.pdf

Wądołowska, Agnieszka (2023) Three legal views on the Polish government's public media takeover, <https://notesfrompoland.com/2023/12/26/three-legal-views-on-the-polish-governments-public-media-takeover/>

Wirtualnedia.pl (2023) Rynek reklamy urósł o 6,7 proc. po pierwszym półroczu 2023 r. Internet dalej umacnia się kosztem telewizji (The advertising market grew by 6.7%. after the first half of 2023, the Internet continues to gain strength at the expense of television), <https://www.wirtualnedia.pl/artykul/rynek-reklamy-w-polsce-internet-zyskuje-traci-telewizja>

Wirtualnedia.pl (2023B) Wydawcy 70 lokalnych portali połączyli siły. Pomagać będzie im Google (Publishers of 70 local portals joined forces. Google will help them),

<https://www.wirtualnedia.pl/artykul/lokalny-klaster-wydawcy-google-koniec-zwiazek-pracodawcow-mediow-cyfrowych>

Wirtualnedia.pl (2023C) „Polityka” spodziewa się powrotu reklam spółek państwowych. „Bez politycznego bana” ("Polityka" expects the return of advertising by state-owned companies. "No political ban"), <https://www.wirtualnedia.pl/artykul/spolki-skarb-panstwa-reklama-polityka-tygodnik-powszechny>

Wirtualnedia.pl (2024) Zmiany w PAP. Rusza centralny Newsroom (Changes in PAP. The central newsroom is launched. (<https://www.wirtualnedia.pl/artykul/pap-centralny-newsroom>)).

Wp.pl (2023) Deklaracja redaktorek i redaktorów naczelnych (Declaration of editors and editors-in-chief), <https://wiadomosci.wp.pl/deklaracja-redaktorek-i-redaktorow-naczelnych-6913597122914976a>

Zadroga, Mateusz (2023) Disinformation Landscape in Poland, DisinfoLAB, https://www.disinfo.eu/wp-content/uploads/2023/12/20231203_PL_DisinfoFS.pdf

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Beata</i>	<i>Klimkiewicz</i>	<i>Professor</i>	<i>University of Krakow</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>Alicja</i>	<i>Jaskiernia</i>	<i>University Professor - Academic</i>	<i>University of Warsaw, Faculty of Journalism, Information and Book Studies</i>
<i>Jędrzej</i>	<i>Skrzypczak</i>	<i>Academic/NGO researchers on social/political/cultural issues related to the medi</i>	<i>Faculty of Political Sciences and Journalism (Wydział, Nauk Politycznych i Dziennikarstwa)</i>
<i>Andrzej</i>	<i>Krajewski</i>	<i>Representative of a journalistic organisation</i>	<i>Towarzystwo Dziennikarskie (Society of Journalists)</i>
<i>Jolanta</i>	<i>Hajdasz</i>	<i>Director of CMWP; Vice-Chair of SDP</i>	<i>Press Freedom Monitoring Centre (CMWP) , Polish Journalists' Association (SDP)</i>
<i>Tadeusz</i>	<i>Kowalski</i>	<i>Member</i>	<i>Krajowa Rada Radiofonii i Telewizji (National Broadcasting Council)</i>

Research Project Report

Issue -

June 2024

doi:10.2870/454716

ISBN:978-92-9466-577-5

QM-09-24-473-EN-N



Publications Office
of the European Union

