

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: Slovakia

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Research Project Report

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1. About the project

1.1. Overview of the Project

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

1.2. Methodological notes

• Authorship and Review

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

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

• The Digital Dimension

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

• The Calculation of Risk

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

- *Scores between 0% and 33%: low risk*
- *Scores between 34% and 66%: medium risk*
- *Scores between 67% and 100%: high risk*

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

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

Table 1: Areas and Indicators of the Media Pluralism Monitor

- **Methodological Changes**

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

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

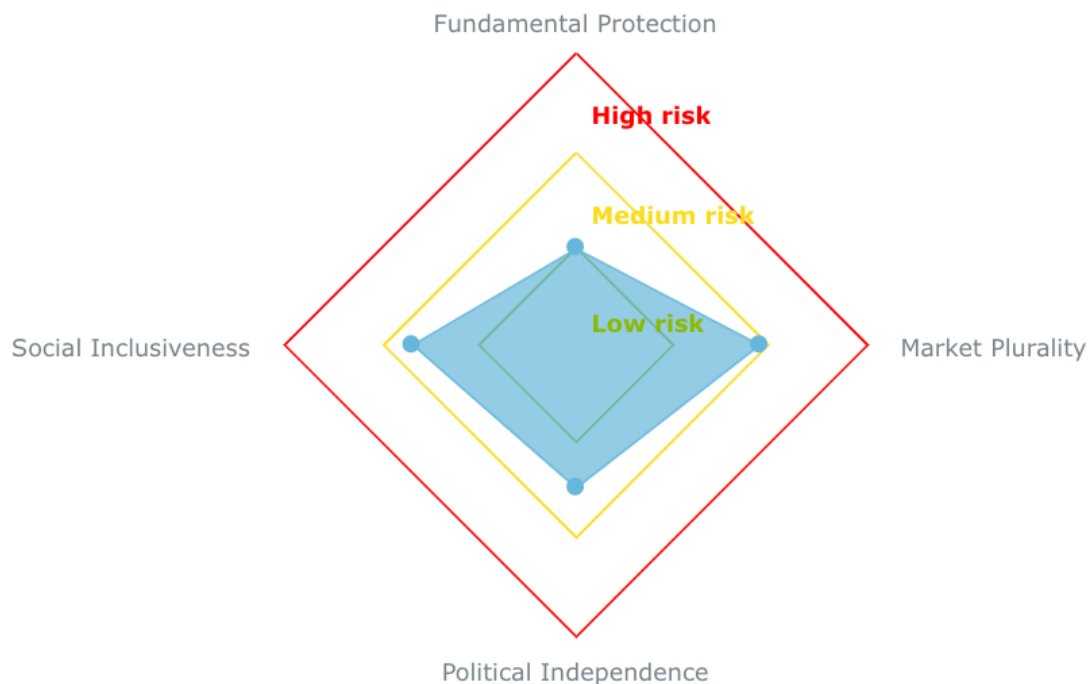
2. Introduction

- **Country overview:** Slovakia is a landlocked Central European country with a territory of 49,035 square kilometres and a population that exceeds 5.4 million. Its capital is Bratislava, with a population of over 430,000.
- **Languages:** The official language is Slovak. There are nine minority languages recognised by law: Bulgarian, Croatian, Czech, Hungarian, German, Polish, Roma, Ruthenian, and Ukrainian.
- **Minorities:** According to the country's 2021 census (ŠÚSR, 2022), the majority of the inhabitants have Slovak nationality (84%). The largest national minorities are Hungarian (8%), Roma (1%), Czech (0.5%), Ruthenian (0.4%), and Ukrainian (0.2%). However, it is assumed that many Roma people chose not to declare their ethnic identity in the census and that the Roma minority is, in fact, much larger; it is estimated at 440,000 (8%) (MVSR, 2019). Roma people predominantly live in the eastern part of the country. The Hungarian minority is concentrated mainly along the southern border with Hungary. The Bratislava region, which is situated in the west, is by far the richest of the country's eight regions, with a gross domestic product (GDP) that is almost double that of the Košice region in the east, which is second.
- **Economic situation:** The Slovak gross domestic product grew by 1.1% in 2023, compared to 1.7% in 2022, according to the Slovak Statistical Office (ŠÚSR, 2024a). On average, in 2023, the total annual inflation rate reached 10.5%, compared to 12.8% last year (ŠÚSR, 2024b). The unemployment rate decreased to 5.9% (1st to 3rd quarter 2023) from 6.1% in 2022 (ŠÚSR, 2024c).
- **Political situation:** Slovakia is a parliamentary representative democratic republic with a multi-party system. Its political landscape is fragmented and, on average, six to seven parties are represented in the Parliament. Following the early parliamentary elections in September 2023, Robert Fico, the leader of the left-wing Smer-Social Democracy party, returned to power after less than four years of a break and formed his fourth Cabinet, together with the centre-left Hlas-Social Democracy and the nationalist Slovak National Party. Since 2019, the presidency has been held by Zuzana Čaputová, who is female, liberal, and pro-European.
- **Media market:** Slovakia has a dual system for public and commercial broadcasting. The public service broadcaster, Radio and Television Slovakia (RTVS) has a relatively strong position; its most popular TV and radio channels are among the market leaders. There are seven nationwide daily newspapers (including two tabloids) and two nationwide press agencies that represent the written press. Czech and Hungarian media are also important players due to the shared historical background and language similarities with the Czech Republic and the presence of a significant Hungarian minority. Commercial TV stations and digital news portals remain the dominant news sources (Newman & et al., 2023).
- **Regulatory environment:** The Ministry of Culture creates the national media policies and drafts most media legislation. The regulatory environment changed significantly in 2022: two new laws came into force (*Act No. 264/2022 Coll., on Media Services* and *Act No. 265/2022 Coll., on Publications*) and a new Council for Media Services was created from the Council for Broadcasting and Retransmission. The Council for Media Services is the major regulatory body that executes state regulation in the field of radio and TV broadcasting, retransmission, and on-demand audio-visual media services. Ethical self-

regulation is performed by the Print-Digital Council of the Slovak Republic for the journalism industry and the Advertising Standards Council for advertising. The Slovak Syndicate of Journalists, the main professional association for journalists, plays a peripheral role because it lacks authority in the journalistic community.

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

Slovakia: Media Pluralism Risk Areas



JS chart by amCharts



According to MPM 2024, three out of four areas pose medium risk to media pluralism in Slovakia: **Market Plurality**, **Political Independence**, and **Social Inclusiveness**. **Fundamental Protection** is the only area that displays a low level of risk for media pluralism, although its risk score is on the border of the medium-risk zone. The total risk score increased slightly compared to MPM 2023, indicating a deterioration of media pluralism in Slovakia. However, the risk zone for each key area mostly remained the same, with the exception of **Market Plurality**, which actually improved and shifted from the high-risk zone to the medium-risk zone, although the improvement in risk score is relatively small. It is also necessary to emphasize that the report evaluates the situation for the year 2023, so developments in 2024 (such as events related to the proposed new law on Slovak Radio and Television and events at TV Markíza) are not reflected in the assessment.

In the area of **Fundamental Protection** (33%), three out of five indicators display medium risk: Protection of right to information; Journalistic profession, standards and protection; and Universal reach of traditional media and access to the Internet. The most significant risks to media pluralism include frequent attacks, threats, and intimidation against journalists (ICJK, 2023), often originating from top political figures (ECPMF, 2023b and 2023c), as well as the absence of effective professional journalistic associations advocating for editorial independence and adherence to professional standards. Additionally, defamation is still classified as a criminal offence punishable by up to eight years of imprisonment (*Act No. 300/2005 Coll., Criminal Code*). Furthermore, the lack of specific anti-SLAPP (strategic lawsuits against public participation) legislation also contributes to the vulnerability of Slovak journalists.

Market Plurality scores the highest risk of the four areas (63%). Three out of five indicators—Plurality of media providers; Plurality in digital markets; and Editorial independence from commercial and owners influence—display high risk. The low profitability in the media industry goes hand in hand with relatively high

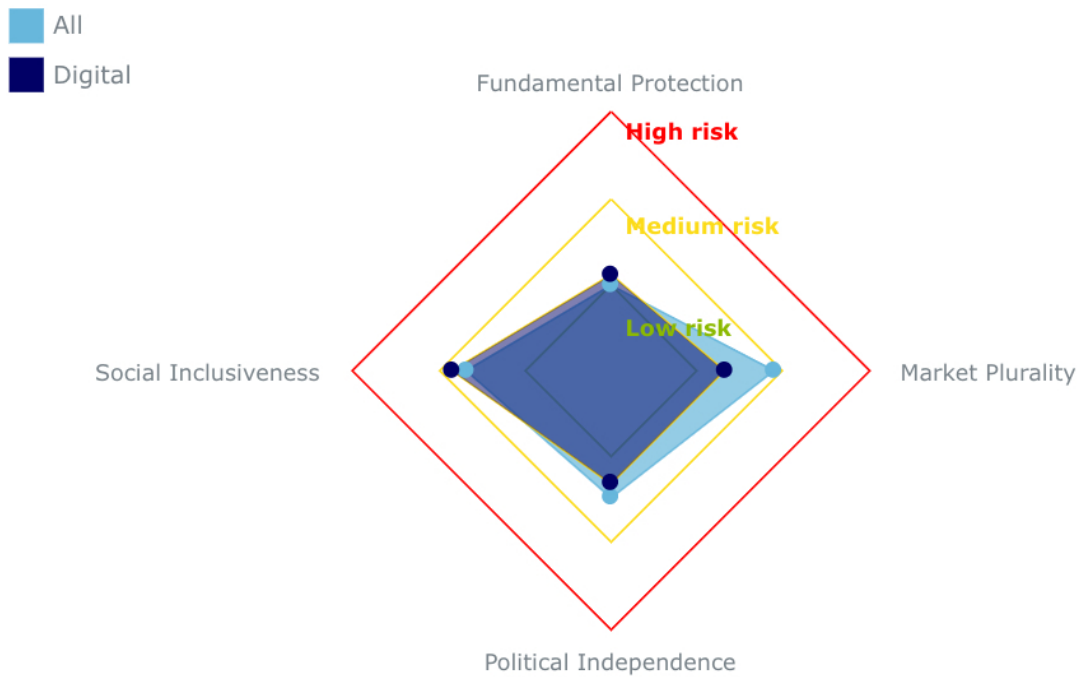
ownership concentration. Simultaneously, it is not unusual for many media owners to have relevant interests and activities in non-media businesses (Godársky & Mračka, 2023). This situation is exacerbated by the lack of regulatory and self-regulatory safeguards that would ensure the editorial independence of newsrooms from commercial and owner influence, as well as the disclosure of any actual or potential conflicts of interest of the media owners that might impact editorial content. Consequently, this creates fertile ground for media owners to covertly promote their business interests through their media outlets, if they choose to do so (see, for example, Denník N, 2023a; Denník N, 2015).

Political Independence displays medium risk (49%), with only one indicator, Independence of public service media, exceeding the high-risk threshold. After the change of government following the early parliamentary elections in September 2023, pressure on RTVS, Slovakia's public service broadcaster, has intensified (RSF, 2023c). The systemic problem with the legislation that does not sufficiently guarantee the independence of the Director General and members of the RTVS Council from political influence (because they are directly elected by Parliament) persists. Additionally, in June 2023, the Slovak Parliament replaced licence fees as the main source of funding for RTVS with a contribution from the state budget, initially set at 0.17 percent of GDP. This change was made hastily and without prior discussion. In December 2023, the new Government reduced the sum to 0.12 percent of GDP (*Act No. 532/2010 Coll. on RTVS*), resulting in a significant budget reduction. Furthermore, top representatives of the new Government consistently voice strong criticism against RTVS (e.g., Denník N, 2023b; Denník N, 2024c), and have announced that they are exploring alternative avenues to replace its top management (Pravda, 2024). This includes the possibility of splitting RTVS into separate radio and television entities, thereby facilitating the replacement of the current Director General (e.g., RTVS, 2023a). Further developments regarding RTVS occurred after the data collection deadline for this report. However, for the sake of completeness, it should be noted that the Ministry of Culture reconsidered the idea of splitting RTVS and came up with an alternative solution: in April 2024, it introduced a new draft law proposing the abolition of RTVS and the establishment of a new organization named STVR (Slovak Television and Radio) with an identical mission and tasks. In practice, this move would allow for the termination of the tenure of RTVS Board members as well as the incumbent Director General years before his term was set to expire. These steps give rise to serious concerns about the future independence of RTVS. Moreover, the lack of safeguards to prevent politicians from owning media companies, the absence of fair and transparent rules on the distribution of state advertising to media outlets, and the proliferation of disinformation websites pose further risks to media pluralism.

In the area of **Social Inclusiveness** (56%), Gender equality in the media and Protection against disinformation and hate speech are the most problematic indicators, both scoring high risk. Although there are undoubtedly many excellent and successful women journalists in Slovakia, including several editors-in-chief, the overall proportion of women in the leadership of media organisations is low, as is the representation of female experts in news and current affairs content. The position of women in the media industry and their media representation is rarely the subject of public debate, and media organisations, including public service media, lack gender strategies and action plans in this regard. In addition, disinformation is widespread in Slovakia (GLOBSEC, 2023), and state efforts to tackle it have been hindered after the new Government made extensive staff changes in the specialised units dealing with strategic communication at several ministries and the Government Office of the Slovak Republic (Prague Security Studies Institute, 2023).

Focus on the digital environment

Slovakia: Media Pluralism Risk Areas Digital



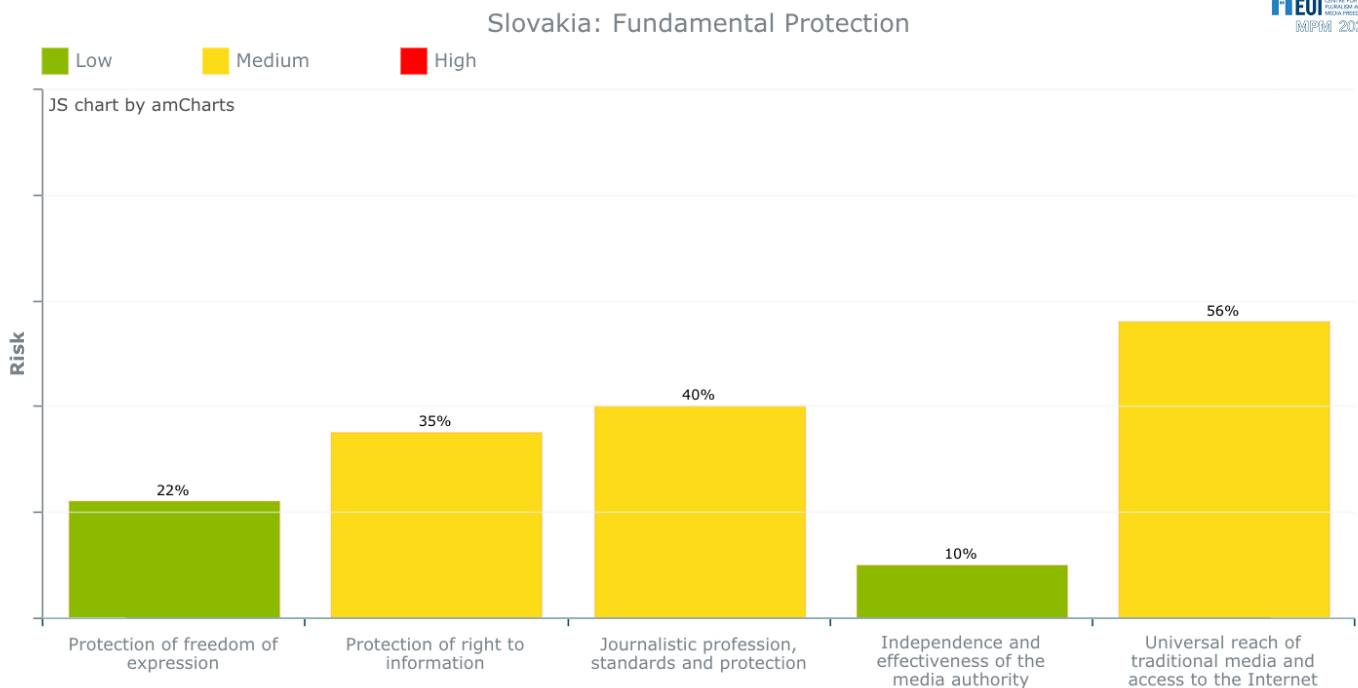
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In the online environment, the main risks to media pluralism in Slovakia lie in the area of **Social Inclusiveness** (62%), mainly due to the lack of gender equality in the media and the burgeoning activities of dis- and misinformation online media. This is followed by the areas of **Market Plurality** (44%), **Political Independence** (44%), and **Fundamental Protection** (37%). All four areas fall in the medium-risk zone.

3.1. Fundamental Protection (33% - 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.



In the area of **Fundamental Protection**, the risk score increased to 33% from 24% last year; thus, even though this area remains in the low-risk zone, it closely borders the medium-risk zone. Three indicators display medium risk, compared to just one indicator last year: Universal reach of traditional media and access to the Internet, and, unlike previous year, also Protection of right to information and Journalistic profession, standards and protection.

Similar to last year, **Protection of freedom of expression** shows to be a low risk (22%) because Slovak legal provisions adhere to international human rights standards (see *Act No. 460/1992 Coll., Constitution of the Slovak Republic; Act No. 23/1991 Coll., that introduces The Charter of Fundamental Rights and Freedoms*). Nonetheless, defamation is still defined as a criminal offence, and it may be punished with up to eight years of imprisonment (*Act No. 300/2005 Coll., Criminal Code*). The length of the prison sentence makes the Slovak defamation legislation one of the strictest in Europe (Griffen, 2017). In 2022, the Ministry of Justice announced its plan to reduce the penalties for the offense of defamation, but the change has not been implemented, and in 2023, the plan was halted and shelved. Although accusations of defamation have not led to convictions in recent years, in the past, politicians and judges used them to respond to criticism (Griffen, 2017; Hanák, 2016). This practice still occurs occasionally. For instance, in March 2023, the then-opposition (now the ruling) Smer-SD party filed three criminal defamation lawsuits against well-known journalists and political commentators over their critical commentaries (ECPMF, 2023a).

In the **Protection of right to information** indicator, the risk increased to medium (35%) from low (19%) last year. According to available evidence, public administration at times denies access to information in an arbitrary way (Aliancia Fair Play, 2021; Pravda, 2023; Transparency International Slovensko, 2021). Public administration bodies and public companies often take very different approaches to the provision of

information and in many cases, citizens can only access the information on the basis of a court decision, which usually takes years (Transparency International Slovensko, 2021). Furthermore, cases of arbitrary sanctions against whistleblowers do occur. The Ministry of the Interior dismissed several officers from their positions at the National Criminal Agency, disregarding their whistleblower status and failing to obtain prior approval from the Office for the Protection of Whistleblowers (Office for the Protection of Whistleblowers, 2023a), as required by the Whistleblower Protection Act (*Act No. 54/2019 Coll., on the Protection of Whistleblowers*). Additionally, the government attempted to introduce changes to the Whistleblower Protection Act without prior debate, a move that was criticized as detrimental by the Office for the Protection of Whistleblowers (2023b). Ultimately, these proposed changes were reversed. On a more positive note, the independent Office for the Protection of Whistleblowers, which was established in 2021 (based on *Act No. 54/2019 Coll., on the Protection of Whistleblowers*), has had a promising start. The number of complainants and the number of complaints within the Office's remit are increasing over time, which can be seen as a positive sign (Office for the Protection of Whistleblowers, 2023c). Additionally, in May 2023, the Parliament finally approved the amendment to *Act No. 54/2019 Coll., on the Protection of Whistleblowers*, which transposes the EU Directive on Whistleblowing (Directive 2019/1937).

Journalistic profession, standards and protection shows to be a medium risk (40%), indicating a notable increase from the low risk (28%) reported last year. Several issues deserve attention. First, Slovak journalists often face attacks, threats, and intimidation, with the assaults frequently originating from top politicians. For instance, in November 2023, Prime Minister Robert Fico attacked four major media outlets—*TV Markíza*, the dailies *Sme* and *Denník N*, and the online outlet *Aktuality.sk*—labelling them as enemies and hostile media. He announced he would stop all communication with them (ECPMF, 2023b and 2023c). According to a survey conducted by the Investigative Center of Ján Kuciak (ICJK), two out of three Slovak journalists experienced a threat or intimidation in the preceding 12 months and 4% experienced a physical attack (ICJK, 2023). In 2023, ICJK launched the platform *Safe.journalism.sk* (*Bezpečná.žurnalistika.sk*), which aims to monitor attacks against journalists and provide assistance to those who have been targeted. In its first year of operation, the platform recorded 48 attacks against journalists, primarily consisting of online threats and intimidation, as well as personal attacks, lawsuits, and death threats (ICJK, 2024).

Second, regarding the prosecution of crimes against journalists, in a retrial in 2023, Slovak businessman Marian Kočner was acquitted by the Special Criminal Court of ordering the assassination of journalist Ján Kuciak and his fiancée (RSF, 2023a). However, prosecutors have already filed an appeal. Conversely, during the trial, the businessman's associate Alena Zsuzsová was found guilty of ordering the execution. All other individuals charged with the murder—two hitmen and a middleman who cooperated with the justice system—have already been sentenced to long prison terms.

Third, some journalists are in a vulnerable position due to the widespread practice of circumventing standard employment contracts to cut costs. Fourth, the Slovak Syndicate of Journalists, the main journalists' professional association in Slovakia, is not effective. It lacks authority in the journalistic community, it does not engage in public debates on current issues regarding journalists and journalism, and the membership rate among active journalists is very low. Thus, a collective voice and defence are lacking when there is an attack against journalists or the journalistic community. This drawback is partially alleviated by the new *Platform for the Promotion of Press Freedom and Safety of Journalists* which was established in 2023 (RSF, 2023b). However, it is not a professional association; rather, it is a body composed of representatives of relevant state institutions, regulatory and self-regulatory bodies, and media and press freedom organisations.

Fifth, the lack of specific anti-SLAPP (strategic lawsuits against public participation) legislation also contributes to the vulnerability of Slovak journalists. According to estimates by the Ministry of Justice, approximately 10 SLAPP cases against journalists were registered in Slovakia in 2022 (MSSR, 2023). Despite this, there are no indications that the Slovak Ministry of Justice plans to translate the European Commission's anti-SLAPP Recommendation 2022/758 (on protecting journalists and human rights defenders who engage in public participation from manifestly unfounded or abusive court proceedings) into Slovak legislation. The implementation of the Recommendation is necessary as the proposed EU [anti-SLAPP Directive](#) will exclusively apply to cases with cross-border implications.

Independence and effectiveness of the media authority scores as a low risk (10%), the same as in the previous year. Regarding the key regulatory body, the Council for Media Services (a new body that replaced the Council for Broadcasting and Retransmission under the new *Act No. 264/2022 Coll., on Media Services*, which was adopted in 2022), there are no reports that suggest that its decision-making practice had been compromised or that its decisions were outside the realm of what would be considered as legitimate dissent. However, politically motivated nominations have occurred in the past years and the risk of the selection and appointment of candidates based on their political connections and affiliations still exists because these are elected directly by the Parliament. The Council for Media Services is to become the national Digital Services Coordinator responsible for supervising, enforcing and monitoring the [Digital Services Act](#).

The score for **Universal reach of traditional media and access to the Internet** remains in the medium-risk zone. The risk score increased to 56% from 38% last year, primarily due to the use of new source of data on broadband coverage and access, as explained in the main MPM report. Still, the coverage of households by broadband internet and the share of households with broadband subscription are rather low compared to other EU countries. Also, not all citizens can receive the signal for public service channels (only 94% of the population has this opportunity; RpMS, 2023a). In addition, regarding net neutrality, ownership concentration of the internet service providers (ISPs) cannot be assessed because there are no comprehensive data for the market shares of the main players.

Focus on the digital environment

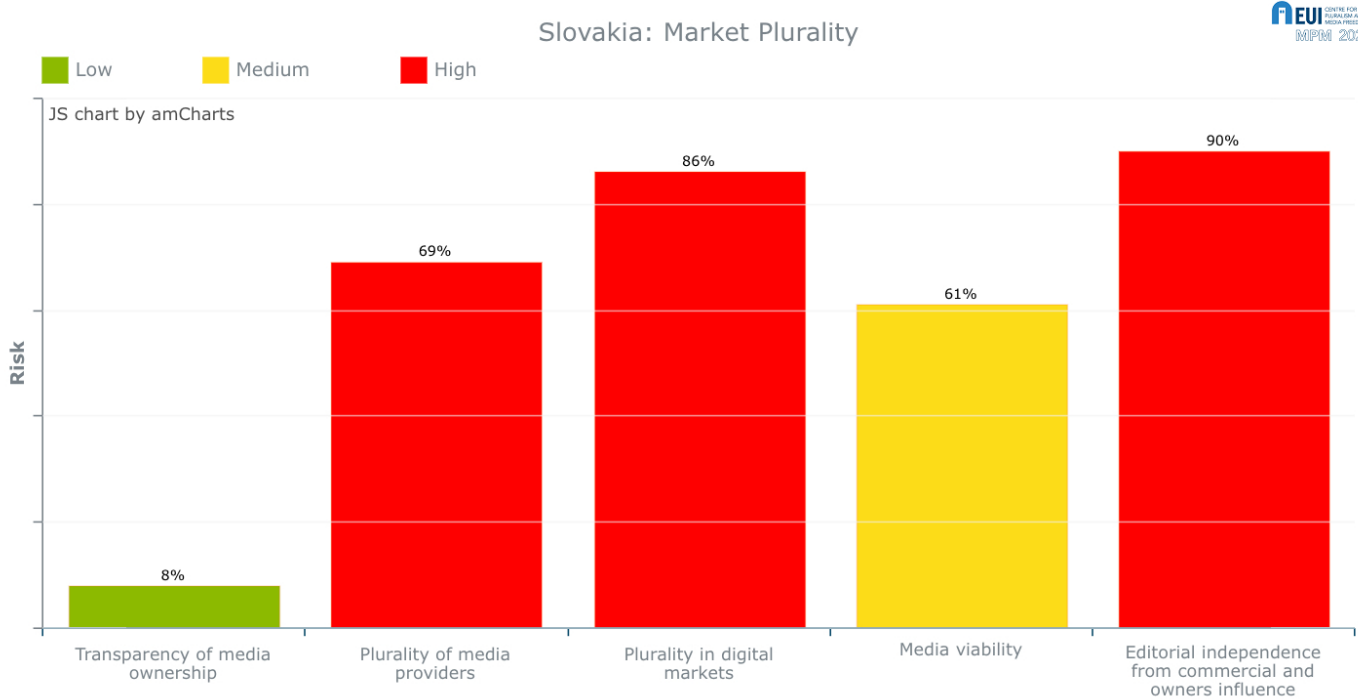
The risk score for **Fundamental Protection** in the digital domain (37 %) is higher than the risk score for this area overall (33 %). Despite the relatively small difference, it signifies that while Fundamental Protection falls into the low-risk zone overall, in the digital domain, it falls within the medium-risk zone.

Freedom of expression is clearly defined by law, and it applies to the online environment as well, without any limits or exceptions. No cases of digital surveillance or hacking by state or non-state actors were reported in 2023. However, the online safety of journalists is a concern. Online harassment and abuse come from different actors, especially from audience members (such as insults and threats via e-mail or social media) and political actors (for an overview, see ECPMF, 2023d). Women journalists often face threats to the same, if not greater, extent than their male counterparts (see, e.g., ECPMF, 2023e for the case of RTVS host Marta Jančárová).

The data retention obligations for electronic telecommunications operators and internet service providers are transparent and fully compliant with international human rights standards. Regulatory safeguards for net neutrality are well implemented in practice and regularly monitored by the Regulatory Authority for Electronic Communications and Postal Services. On a less positive note, the ownership concentration of the internet service providers cannot be assessed because there is no comprehensive data for the market shares of the main players. Also, the share of households covered by broadband internet is below the EU average (84.4% compared to 91.5%; Eurostat, 2023a) and the share of households with broadband subscription are rather low compared to other EU countries (Eurostat, 2023b).

3.2. Market Plurality (63% - 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).



The area of **Market Plurality** scored 63%, indicating a slight improvement from 68% last year. This change marked a shift to the medium-risk zone from the high-risk zone compared to the previous year. Three indicators—Plurality of media providers, Plurality in digital markets, and Editorial independence from commercial and owners influence—stays in the high-risk zone. Media viability improved to medium-risk zone from the high-risk zone last year, while Transparency of media ownership remains in the low-risk zone.

Like last year, **Transparency of media ownership** displays a low-risk score (8%). This is mostly due to new legislation adopted in 2022 (*Act No. 264/2022 Coll., on Media Services* and *Act No. 265/2022 Coll., on Publications*), which requires publishers, news website operators, broadcasters, and the providers of on-demand audio-visual media services to disclose information on their ultimate owners.

The indicator of **Plurality of media providers** remains in the high-risk zone, even though the risk score improved to 69% from 83%. However, this improvement is not a consequence of a change in the situation on the ground, but rather of a minor adjustment of the methodology and the availability of some data. Based on the methodology employed by the MPM, which uses the audience/revenue share of the four largest media owners in each sector (i.e., print, TV, radio, digital) as an indicator to assess the level of ownership concentration, the audience concentration in the newspaper, audio-visual, and radio sectors is high (i.e., the audience share of the top four media owners exceeds 60%). However, the limited size of the Slovak media market must be taken into account when interpreting these results. Furthermore, the data on

market share (based on revenue) in individual sectors are not collected and published, and it is, therefore, not possible to evaluate the level of concentration of ownership and the efficiency of the measures aimed at the prevention ownership concentration. The regulatory safeguards against the high degree of horizontal and cross-media concentration of ownership in the media sector adopted in 2022 (*Act No. 264/2022 Coll., on Media Services* and *Act No. 265/2022 Coll., on Publications*) apply to TV and radio broadcasters and do not cover press and news websites. This shortcoming became evident in 2023 when the owner of the second most-read daily, *Plus jeden deň*, purchased the most-read daily, *Nový čas*, without any constraints (Euractiv.sk, 2023).

The **Plurality in digital markets** indicator remains in the high-risk zone (86%), with the same risk score as in the previous year. When it comes to online platforms, the concentration of ownership is difficult to assess because there are no data for online advertising revenue share or online audience share. Also, media-specific limitations are set only for broadcasting media and not for printed press and news web portals. In addition, there are no media-specific rules to prevent high levels of concentration in the digital advertising market. The Antimonopoly Office enforces supervision under the general rules derived from *Act No. 187/2021 Coll., on the Protection of Competition*. When it comes to financial agreements between digital intermediaries and news-media producers, although the amendment to *Act No. 185/2015 Coll., the Copyright Act* that transposed EU Directives 2019/790 and 2019/789 was adopted in 2022, it did not make any major changes in practice. For instance, most Slovak media outlets immediately agreed to Meta's demands and granted the company the right to use their images free of charge (Denník N, 2022a). No special form of taxation for digital services has been introduced or scheduled, but, at least, the EU Directive 2022/2523 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups was transposed in 2023 (via *Act No. 507/2023 Coll.*).

Compared to last year, the assessment of **Media viability** improved to medium-risk zone from the high-risk zone, with the score decreasing to 61% from 87%. This improvement can be attributed primarily to increased revenues in the TV sector and a slight increase in the number of journalists. Nominal public service media revenues (RTVS, 2023b) and nominal advertising revenues in the TV sector (according to the WARC Adspend database forecast and data from the Ministry of Culture; MKSR, 2023) grew above the rate of inflation in the past years. However, revenues in the digital news sectors remained stagnant, and the radio sector (MKSR, 2023) as well as the newspaper and magazine sector (according to the WARC Adspend database forecast) even experienced a nominal decline. Thus, amidst high inflation, some media outlets are facing financial difficulties. According to the Association of Slovak Print and Digital Media, total revenues decreased in 2023, and publishers failed to adjust advertising or content product pricing to reflect inflation. This also applies to local printed media. While the number of journalists employed by TV and radio broadcasters increased slightly over the past years (MKSR, 2023), the situation for print and digital journalists, according to the Association of Slovak Print and Digital Media, remained similar to 2022; most newsrooms neither laid off nor hired additional staff. The overall economic condition of the media sector is difficult to ascertain due to the unavailability of revenue data for 2023. The fragile economic situation of the news media is exacerbated by the absence of public support schemes for this sector.

The indicator of **Editorial independence from commercial and owners influence** remains in the high-risk zone, but the risk score increased to 90% from 75% last year. This rise is primarily attributed to new evidence of commercial interferences (see Denník N, 2023a) and a methodological change - an addition of a question assessing the interests, links, and activities of major media owners in non-media businesses. In this regard, it must be noted that the vast majority of the key Slovak media outlets are in the hands of the local (i.e., Czech and Slovak) businessmen who have interests in many industries (Godársky & Mračka,

2023). Given the difficult economic situation in the media market, it seems likely that at least some of these owners bought the media outlets to support their activities and interests outside the media field (in the past, some admitted it openly; see Denník N, 2015). Systematic data or reports on the commercial influences on editorial content are lacking. However, there is, for instance, anecdotal evidence that the News and Media Holding publishing house, the leader in the print and online media segment, may be covertly promoting other business interests of its owner through its newspapers and magazines—see the recent case of the free biweekly *Plus jeden deň Špeciál* (Denník N, 2023a) or the magazine *Trend* (O médiách, 2020a and 2020b). Furthermore, Slovakia lacks a mechanism (legal or self-regulatory) that would grant journalists specific social protection in the case of changes to ownership or the editorial line (journalists are only protected via general provisions of *Act No. 311/2001 Coll., Labour Code*). It also lacks regulatory safeguards to ensure that decisions about the appointments and dismissals of the editor-in-chief are not influenced by commercial interests, as well as self-regulatory schemes that would guarantee a clear separation between the editorial and commercial activities of news organisations or require news organisations to disclose any actual or potential conflicts of interest for the media owners that could affect editorial content.

Focus on the digital environment

In terms of **Market Plurality**, the online media environment displays a lower risk score (44%) compared to the overall media market (63%), despite both being classified within the medium-risk zone. Among other reasons, this can be attributed to the more favourable economic conditions of digital media compared to the printed press or the radio sector. Additionally, the economic situation of digital media slightly improved compared to last year. This is also the reason why the risk score improved from the previous year's 57% - together with the transposition of the Council Directive (EU) 2022/2523 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups, which also impacts this indicator.

Regarding the transparency of media ownership, after the adoption of the new *Act No. 265/2022 Coll., on Publications* in 2022, legal provisions requiring the disclosure of ownership details (including the ultimate owners) also apply to native digital media. However, media-specific regulatory safeguards against high levels of horizontal and cross-media concentration apply solely to TV and radio broadcasters and providers of a terrestrial multiplex, not to, for example, digital news portals (where only on-demand audiovisual media services would be assessed; see *Act No. 264/2022 Coll., on Media Services*). For instance, this shortcoming enabled News Media Holding, a major Slovak publishing house and owner of the second best-selling daily newspaper *Plus jeden deň*, to acquire the best-selling daily newspaper *Nový čas* in 2023.

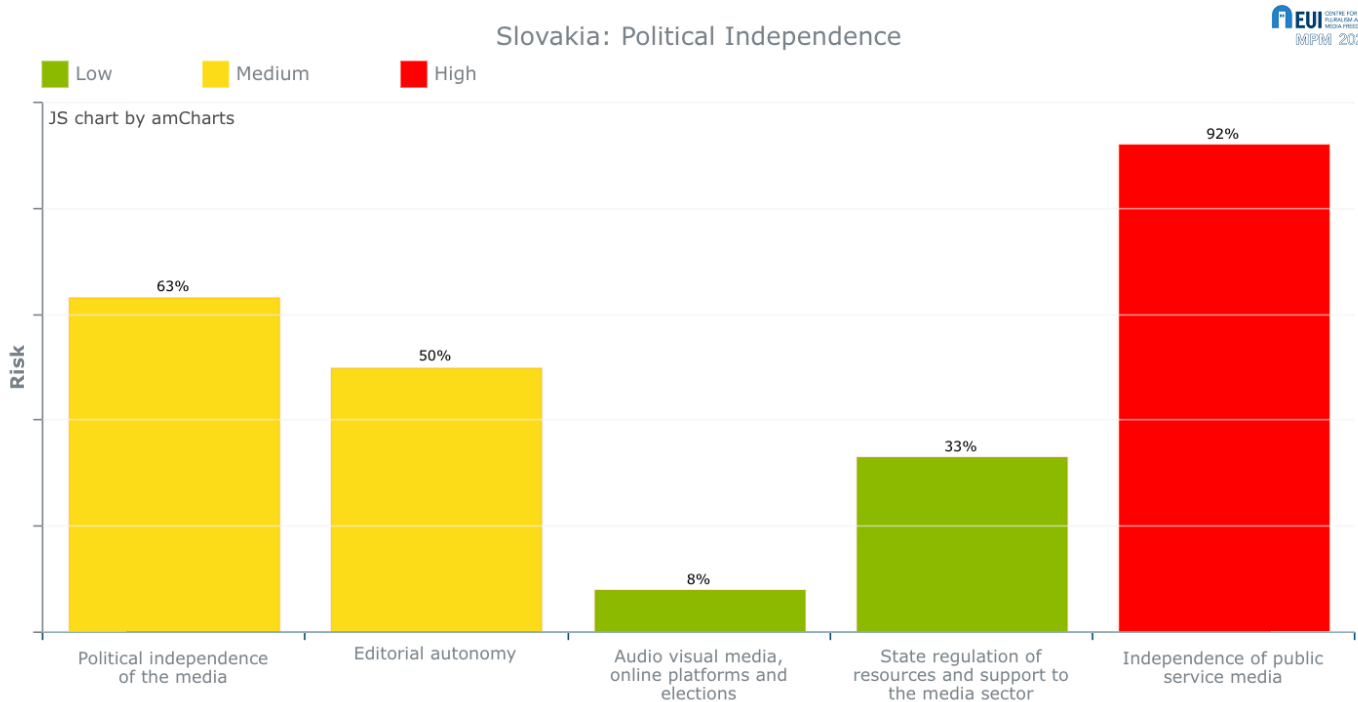
Based on limited data on the Top 50 most visited Slovak websites, the top four online news websites achieved an audience/reach share of 38% (IAB Slovakia, 2023); this, according to the MPM methodology, counts as a medium risk. The actual level of ownership concentration in the online news media sector is difficult to assess because the law does not require financial reporting in the digital media sector and there is no data about the market shares or advertising revenue (the same applies to online platforms).

Regarding the concentration of ownership, the Antimonopoly Office provides supervision under the general rules derived from *Act No. 187/2021 Coll., on the Protection of Competition* without taking into account specificities and the digital evolution of the media sector. Despite the amendment to *Act No. 185/2015 Coll., the Copyright Act*, which transposed EU Directives 2019/790 and 2019/789 in 2022, it did not result in any significant changes in practice regarding financial agreements between digital intermediaries and news media producers. For instance, most Slovak media outlets immediately agreed to Meta's demands and granted the company the right to use their images free of charge (Denník N, 2022a). No special form of taxation for digital services has been introduced or scheduled, but, at least, the EU Directive 2022/2523 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups was transposed in 2023 (via *Act No. 507/2023 Coll.*).

In economic terms, the year 2023 witnessed an 8% growth in internet advertisement spending (i.e., not only in digital news media), which is below the rate of inflation (IAB Slovakia, 2024). According to the Association of Slovak Print and Digital Media, total revenues decreased in 2023, and publishers failed to adjust advertising or content product pricing to reflect inflation. Slovak news media organizations have been developing alternative sources of revenue; for example, the largest news sites have been charging for their content and implementing paywalls since 2011, with Slovakia being at the forefront of these efforts (Baker, 2012). Notably, the main quality dailies, Denník N and SME, have around 60,000 active digital subscribers each (SME, 2023; Denník N, 2023e). However, there are no support schemes for the news media sector, including native digital media.

3.3. Political Independence (49% - medium risk)

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



The area of **Political Independence** continues to be in the medium-risk zone, with the risk score remaining almost stable (49% compared to 52% last year). Similar to the previous year, only one indicator exceeds the high-risk threshold: Independence of public service media. The risk band for the remaining four indicators also remains unchanged. Political independence of the media and Editorial autonomy are in the medium-risk zone, while the indicators of Audio-visual media, online platforms and elections, and State regulation of resources and support to the media sector display low risk.

The **Political independence of the media** indicator remains in the medium-risk zone, with almost the same risk score as the previous year (63%). Regulatory safeguards to prevent conflicts of interest in the media sector or effectively limit direct or indirect control of media outlets by politicians, political parties, and partisan groups are still lacking. Therefore, active politicians can own media companies.^[1] Furthermore, although no systematic data on political influence on major news media were available in 2023, two cases raise serious concerns. First, the News and Media Holding publishing house, the leader in the print and online media segment and a part of the portfolio of the financial group Penta, began distributing the free bi-weekly *Plus jeden deň Špeciál* in Autumn 2022 to one million households, a significantly larger reach than other periodicals. As described by *Denník N* (2023a), this free bi-weekly gives disproportionately large space to the Hlas party and its representatives, as well as the Smer party (both of which became coalition parties after the parliamentary elections in September 2023), while strongly criticizing some parties of the previous Government. Consequently, Transparency International Slovensko (2023a) filed a complaint against *Plus jeden deň Špeciál* for failing to adhere to journalistic standards and for promoting specific

political parties, which could be perceived as an attempt by a third party to influence the election campaign. Second, the recent developments at *TV Markíza*, the leading television group in Slovakia, raise concerns as well. Shortly after representatives of the current Government expressed dissatisfaction with its news coverage—Prime Minister Robert Fico described it as a "hostile medium" (HNonline.sk, 2023)—*TV Markíza* made personnel changes at the highest positions (Denník N, 2024a) and shifted its approach to news. This shift involved moving away from its traditional news coverage to softer, more positive news, with reduced focus on political issues and less confrontation with Government officials (Denník N, 2024b). The owner of *TV Markíza*, PPF, has significant economic interests in Slovakia, which include business dealings with the state (Denník N, 2024b). While commercial media have the right to shape their news coverage as they see fit, there is concern that the retreat from quality critical journalism could be connected to maintaining good relations with the state and the government. However, this development occurred only in 2024 and is therefore not included in the evaluation.

Additionally, the political independence of town hall media (i.e., local/regional media) is a concern because these outlets are funded and owned by local/regional authorities, often resulting in content that is blatantly skewed in favour of the current local/regional political representation (Transparency International Slovensko, 2022a). Furthermore, fake-news websites and disinformation promoted by online media continued to proliferate in 2023.

Like last year, **Editorial autonomy** displays a medium risk score (**50%**). On a positive note, self-regulatory measures that stipulate editorial independence from political interference are included in the [Journalist's Code of Ethics](#), and all of the major media outlets, including press agencies, signed on to it. In the monitored period, no major incidents were reported by the Print-Digital Council of the Slovak Republic, the self-regulatory body for journalistic ethics. On a more negative note, there are no legal safeguards that would guarantee autonomy when appointing and dismissing editors-in-chief. In general, although there were no serious signals in 2023 that the majority of legacy media would be troubled by political influence, the cases of the free bi-weekly *Plus jeden deň Špeciál* and the development of the situation at *TV Markíza* in the first months of 2024, as described above, raise concerns in this regard.

As in 2022, **Audio-visual media, online platforms and elections** scored low risk, with the risk score remaining almost the same (**8%**). Concerns about the political independence of the public-service broadcaster RTVS and its fair representation of political actors and viewpoints diminished after the arrival of a new Director General in August 2022. Generally, the regulatory and self-regulatory framework for the fair representation of different political actors and viewpoints is in place and effective most of the time. Early parliamentary elections were held in Slovakia in September 2023. Monitoring conducted by the Council for Media Services (RpMS, 2023b) and the Election Assessment Mission of the Office for Democratic Institutions and Human Rights (OSCE, 2024) does not indicate any systemic bias or lack of fairness in the election coverage of the main TV channels. A more pressing concern is the widespread dissemination of deep fake videos and fake recordings of politicians on the internet through social media, intended to influence the elections (OSCE, 2024).

The State regulation of resources and support to the media sector displays a low risk score (**33%**), the same as in 2022. However, like last year, a general lack of transparency for state advertising remains an issue. There is no specific legislation that would stipulate the rules for the distribution of state advertising to media outlets.

The Independence of public service media remains in the high-risk zone, with identical risk score as last year (**92%**). The current legal regulation (*Act No. 532/2010 Coll., on the Radio and Television of Slovakia*) does not guarantee the independence of the Director General of RTVS and the RTVS Council members from political influence because these are all elected directly by the Parliament. The law itself would not necessarily be problematic if the political actors were willing to select candidates based on professional, and not political, criteria. In previous years, there was anecdotal evidence suggesting that appointments of the top management are not independent of political influence (Denník N, 2022b; 2022c; 2022d). Recently, Andrej Danko, the chairman of the SNS party (currently a coalition party), described how, under the previous Director General, he had an influence over personnel matters in RTVS and provided his "political approval" when he was serving as the Speaker of the Parliament for the selection of the moderator of the main political discussion programme of RTVS; the previous Director General denied these claims (Denník N, 2024c).

Political pressure on RTVS increased significantly after the early parliamentary elections held in September 2023, a concern also noted by international press freedom organizations (RSF, 2023c). The representatives of the new Government strongly criticize RTVS for its alleged lack of objectivity and failure to fulfil its public service mission, despite the respective regulatory bodies (the Council for Media Services and the RTVS Council) not indicating any serious shortcomings in this regard. Even before the elections, Robert Fico, the leader of the Smer party and current Prime Minister, declared his intention to "go for the Director General's throat" (Denník N, 2023b). Andrej Danko, the leader of the SNS party, suggested that RTVS needs "a firm hand" and "nationalization", further stating that "people who work at RTVS must be fired within 48 hours" (Denník N, 2023c; Denník N, 2024c). The current Government Programme Statement stipulates that the Government will split RTVS into separate television and radio organisations, or possibly consider other solutions to strengthen the public nature of RTVS (RTVS, 2023a). The splitting would enable the Government to remove the current Director General and elect its own candidate (the Director General is directly elected by Parliament).

Furthermore, another form of political pressure on RTVS concerns its funding. At the very end of 2022, the Parliament abruptly eliminated the licence fees without prior public debate. In 2023, before the parliamentary elections, the fees were replaced by a claimable contribution from the state budget, equivalent to 0.17 percent of GDP. However, in December 2023, the new Government announced a reduction in the RTVS budget to 0.12 percent of GDP (see para 21 of the *Act no. 532/2010 Coll. on RTVS*), resulting in a significant budget cut of around 30%.

Further developments regarding RTVS occurred after the data collection deadline for this report, so they are not reflected in the evaluation itself, conclusions, and recommendations. However, they are presented here for completeness. In April 2024, the Ministry of Culture introduced a new draft law proposing the abolition of RTVS and the establishment of a new organisation named STVR (Slovak Television and Radio) with an identical mission and tasks. In practice, this move would allow for the termination of the tenure of RTVS Board members as well as the incumbent director, Ľuboš Machaj, years before his term was set to expire. According to the draft law, a nine-member council will be responsible for appointing the director. The culture and finance ministries will nominate four members to the council, while the remaining members will be appointed by parliament. This would mean that all new members would be selected by the current governing coalition. The draft law on STVR was approved by the government in late April and is expected to be approved by parliament in June 2024. The plan has been widely criticised by journalists, the opposition, as well as international media organisations (Euronews, 2024).

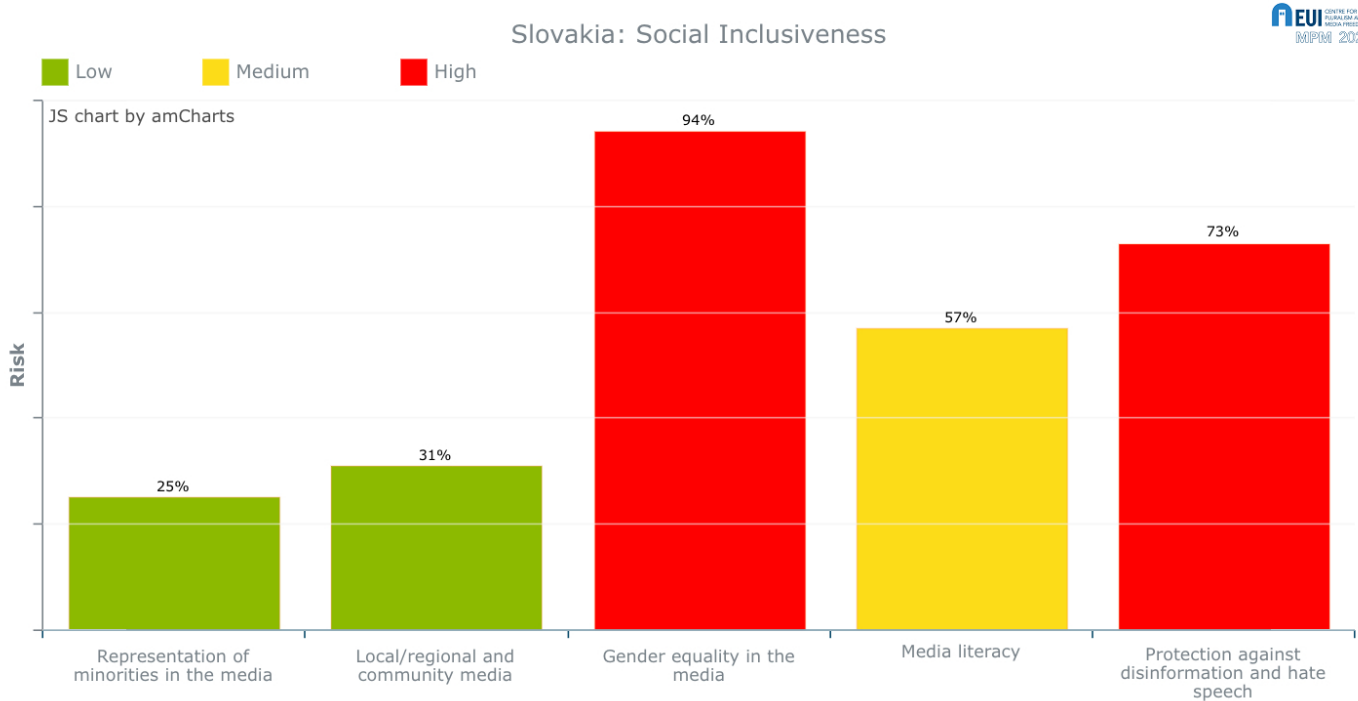
Focus on the digital environment

In the area of **Political Independence**, online media are less at risk of being politically controlled than the media sector in general (44% compared to 49%; both within the medium-risk zone), with no change observed annually. The leading native digital media are largely free from political influence. However, the worrying trend of the increased activity of news websites with unclear funding that produce biased content, fake news, and disinformation continued in 2023. These online media do not adhere to journalistic standards or ethical codes of conduct, and their stories often do not have an identifiable author. They produce biased content, fake news, misinformation, disinformation, and, in some cases, extremist propaganda. As an anecdote illustrating the nature of these websites, it's worth mentioning that one of the authors contributing to the disinformation outlet Hlavné Správy was convicted for taking bribes and conducting espionage for Russia (Slovak Spectator, 2023). According to a recent report, the largest group of disinformation sites primarily focuses on socio-political topics and does so mostly out of conviction (Dubóczy, Friedl, Ružičková, 2023).

The risk also lies in the lack of regulation for political advertising on online platforms. The provisions aimed at ensuring the fairness of political advertising during election campaigns do not extend to news websites (*Act No. 181/2014 Coll., on Electoral Campaigns*). Furthermore, the regulation aimed at ensuring the transparency of political advertising during election campaigns (*Act No. 181/2014 Coll., on Electoral Campaigns*) is flawed. Political parties and candidates competing in elections are obliged to submit a final report on the costs of their election campaign to the Ministry of Interior, with these reports being subsequently published online. The final report shall include, among others, an overview of the cost associated with paid advertising, publicity, and political promotion, as well as the expenses related to election posters. However, the parties and the candidates are not obliged to report separately on campaign spending on online platforms and social media. This is, at least partially, remedied by the estimation of the costs of the online advertising campaign provided by Transparency International Slovensko, which is based on the analyses of the transparent accounts of individual political parties. Such a study was also conducted after the early parliamentary elections held in Slovakia in September 2023 (Transparency International Slovensko, 2023b).

3.4. Social Inclusiveness (56% - 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 area of **Social Inclusiveness** continues to be in the medium-risk zone, experiencing a deterioration compared to last year, with the risk score increasing to 56% from 45%. Two out of the five indicators display high risk: Gender equality in the media and Protection against disinformation and hate speech. The latter indicator moved to high-risk zone from the medium-risk zone last year. The indicators for the Representation of minorities in the media and Local/regional and community media remain in the low-risk zone, and Media literacy remains in the medium-risk zone.

The risk score for **Representation of minorities in the media** remains in the low-risk zone with a similar risk score to last year (25% compared to 19% last year). Only public service media are legally required to grant proportional airtime access to national minorities (see *Act No. 532/2010 Coll., on the Radio and Television of Slovakia*); this does not apply to commercial media. In general, RTVS fulfils its legal obligation to cater to the needs of national minorities well, as stated by the RTVS Council (RTVS, 2023c). However, the Council also noted a lack of funding and staff capacity in this area (RTVS, 2023c). Also, access to airtime in public service media and commercial media for minorities that are not legally recognised (e.g., LGBT+, migrants, Muslims) could be improved, as could their media representation. On a more positive note, Slovakia has a well-developed and implemented legal framework for providing media content to people with disabilities. The new *Act No. 264/2022 Coll., on Media Services*, adopted in 2022, significantly increased the requirements for broadcasters in terms of the proportion of programmes that must be accompanied by voice-overs for persons with visual impairments, and the proportion of programmes with subtitles or sign language for persons with hearing impairments (transitional provisions apply; the proportions of programmes should reach the level set by the Act in 2027).

The **Local/regional and community media** indicator scores as a low risk, with the risk score increasing to 31% from 19% last year. This increase is attributed to the difficult economic situation of local and regional media, exacerbated by the lack of state support through subsidies. According to the report by Transparency International Slovensko (2024), almost a third of Slovakia's population live in districts classified as media deserts or on the brink of becoming media deserts. Conversely, satisfactory local news coverage is available to only one in two people in the country. The number of independent local and regional media outlets providing standard journalism is limited. This sector is dominated by two types of media with low journalistic value to society: first, the outlets owned and/or funded by local governments (municipalities and self-governing regions), often serving to promote the current leadership of the local self-government; second, commercial advertising newspapers and magazines distributed free of charge, mostly directly to households' mailboxes (Transparency International Slovensko, 2022b).

As in the previous year, **Gender equality in the media** remains a high risk, with a year-on-year increase in the risk score to 94% from 83%. This increase is primarily attributed to the decrease in the share of women among editors-in-chief in the leading news media. Women are severely underrepresented in executive positions and on the management boards of both public service media and commercial media, and comprehensive gender equality policies are lacking (even in public service media). Besides, women experts are less often than men invited to comment on political and other relevant matters and events. For example, based on the data collected for this report, in the first half of 2023, women accounted for 11% of the guests on the political talk show *O 5 minút 12* (public-service RTVS), 11% of the guests on the political talk show *Na telo* (TV Markíza), 18% of the guests on the political talk show *V politike* (TA3), 17% of the guests on the talk show on societal issues *Do kríža* (public-service RTVS), and 25% of the guests on the talk show on societal issues *Večera s Havranom* (public-service RTVS). Such bias is, to some extent, attributable to the lower representation of women in politics and the public sphere; however, this is rarely considered problematic, and systematic efforts to achieve equitable representation for women in the media are lacking.

Media literacy remains in the medium-risk zone (57%), with a risk score very similar to that of the previous year. The key issues are the same as in the previous year: the media literacy policy is underdeveloped, outdated, and not among the priorities of the current political leadership. Although media literacy is a compulsory cross-cutting subject in primary and secondary education, there is some evidence that, in practice, it is not being implemented in the curriculum (Bielčíková, 2021). Activities to enhance media literacy are limited and often depend on EU funding, so they are not sustainable in the long term. However, a positive change was brought about by the newly adopted *Act No. 264/2022 Coll., on Media Services*, which vested new competencies in the area of media literacy to the Council for Media Services (in §110 (3) (g, j)). Since 2022, the Council for Media Services has been coordinating various activities and initiatives in the field of media literacy in Slovakia. This initiative led to the establishment of the *Platform for Media Literacy* in 2022, which brings together several dozen actors from the public, non-governmental, and private sectors.

The assessment of the indicator on **Protection against disinformation and hate speech** deteriorated, scoring as a high risk (72%) compared to the medium risk (52%) of the preceding year. This shift was mainly due to the widespread prevalence of disinformation in Slovakia (GLOBSEC, 2023), coupled with hindered state efforts to tackle it. Following the early parliamentary elections in September 2023, the new Government implemented extensive staff changes in specialized units dealing with strategic communication at several ministries and the Government Office of the Slovak Republic. This has introduced instability into the strategic communication environment, raising questions about the new Government's commitment to supporting this portfolio (Prague Security Studies Institute, 2023). The impact of fact-checking initiatives is

limited; for instance, under Meta's Third-Party Fact-Checking Program, all Slovak content on Facebook is fact-checked by just two individuals (Denník N, 2023d). Moreover, the fight against hate speech is limited and does not appear to be among the priorities of the new Government. Furthermore, instead of developing policies against hate speech, some politicians seem to contribute to toxic discourse and societal polarization.

Focus on the digital environment

In the area of **Social Inclusiveness**, the risk score for the online media environment somewhat exceeds the risk identified for the media sector in total (62% compared to 56%). Still, in both cases, it falls within the medium-risk zone, with no annual change. The digital skills of the Slovak population are average (81% of the population has basic or above basic information and data literacy skills while the EU average is 82%; Eurostat, 2023c). This—together with the lack of a systematic, comprehensive, and up-to-date media literacy policy, and the burgeoning activities of dis- and misinformation online media—leads the Slovak population to face a serious risk for succumbing to disinformation and conspiracies (GLOBSEC, 2023). Consequently, disinformation impacts people's attitudes on important issues like the war in Ukraine and on COVID-19 vaccination (SAV, 2022). However, the state efforts to tackle disinformation are limited. Following the early parliamentary elections in September 2023, the new Government implemented extensive staff changes in specialized units dealing with strategic communication at several ministries and the Government Office of the Slovak Republic (Prague Security Studies Institute, 2023). This raises questions about the new Government's commitment to supporting this portfolio.

4. Conclusions

Fundamental Protection scored as a low risk (33%). In general, the protection of the freedom of expression and the right to information follow international human rights standards. On a more critical note, legislation on defamation is still among the strictest in Europe (Griffen, 2017): it is a criminal offence and may be punished with up to eight years of imprisonment (see *Act No. 300/2005 Coll., Criminal Code*). Despite the Ministry of Justice announcing its plan in 2022 to reduce the penalties for the offense of defamation, the proposed change has not been implemented. In 2023, the plan was halted and subsequently shelved. Also, although Slovak journalists' working conditions are generally rather favourable, attacks and threats against the journalists are unacceptably frequent (ICJK, 2023 and 2024) and often come from top political figures (e.g., see ECPMF, 2023b, 2023c, 2023d). Moreover, many journalists are in a vulnerable position due to the widespread practice of avoiding standard employment contracts. On top of that, the Slovak Syndicate of Journalists, the main professional association for journalists in Slovakia, does not effectively fulfil its role.

Recommendations for the Government:

- **Amend Act No. 300/2005 Coll., Criminal Code, to decriminalise defamation or reduce the possible prison sentence.**
- **Adopt, to the maximum extent possible, the European Commission's [Recommendation 2022/758 on the protection of journalists and human rights defenders engaged in public participation from manifestly unfounded or abusive legal proceedings \("Strategic Actions against Public Participation"\) to prevent vexatious lawsuits against journalists.](#)**
- **Call on political representatives to refrain from engaging in attacks against journalists or inciting such attacks, and selectively ignoring queries and invitations from certain media outlets.**

Recommendations for journalists:

- **Renew and strengthen (or newly establish) the professional association for journalists such that it would act as a respected voice for journalists and journalism in Slovakia.**

Recommendations for the National Labour Inspectorate:

- **Monitor compliance with the labour law in the media sector, with a focus on the performance of illegal work (i.e., dependent work carried out outside an employment relationship).**

Market Plurality scored as a medium risk (63%). Transparency of media ownership improved in 2022 with the adoption of new legislation (*Act No. 264/2022 Coll., on Media Services* and *Act No. 265/2022 Coll., on Publications*), which requires publishers, news website operators, broadcasters, and providers of on-demand audio-visual media service to disclose information about their ultimate owners. The level of

concentration of ownership and the efficiency of the measures aimed at its prevention are difficult to assess because the data for the market shares within individual media sectors are not collected and published. Moreover, the Slovak media sector is facing significant economic challenges, particularly affecting print and radio media. It also lacks regulatory safeguards to ensure that decisions about the appointments and dismissals of the editor-in-chief are not influenced by commercial interests, as well as self-regulatory schemes that would guarantee a clear separation between the editorial and commercial activities of news organisations or require news organisations to disclose any actual or potential conflicts of interest for the media owners that could affect editorial content.

Recommendations for the Government:

- **Consider options for direct and indirect media subsidies and state support schemes; these should be adequate, well-targeted, fair, and non-threatening to media independence.**
- **Extend legal restrictions on high levels of horizontal and cross-media concentration of media ownership to include press and web portals.**

Recommendations for media organisations:

- **To enhance the protection of journalists in cases of arbitrary interferences by owners or management, implement the European Commission's [Recommendation 2022/1634](#), which addresses internal safeguards for editorial independence.**

Political Independence scored as a medium risk (49%). The legislation does not sufficiently guarantee the independence of the Director General of the public-service RTVS and members of the RTVS Council from political influence, as they are all directly elected by Parliament. Currently, the actions of the new Government raise significant concerns about the independence of RTVS. The top political representatives consistently voice strong criticism against RTVS (e.g., Denník N, 2023b; Denník N, 2024c) and have announced that they are exploring alternative avenues to replace its top management (Pravda, 2024). Additionally, in June 2023, the Slovak Parliament replaced licence fees as the main source of funding for RTVS with a contribution from the state budget, initially set at 0.17 percent of GDP. This change was made hastily and without prior discussion. After the early parliamentary elections, the new Government reduced the sum to 0.12 percent of GDP (*Act No. 532/2010 Coll. on RTVS*) in December 2023, resulting in a significant budget reduction. Also, no regulatory safeguards prevent political representatives from owning media companies, and some are taking advantage of it. For completeness, it is necessary to note that this report assesses the situation for the year 2023. Consequently, current events related to the draft of the new law on RTVS and the situation at TV Markíza are not reflected in this assessment.

Recommendations for the Government:

- **After a thorough public discussion of possible alternatives, amend *Act No. 532/2010 Coll., on Radio and Television of Slovakia* to de-politicize the election of the Director General and the members of the RTVS Council, and keep in place strict rules for their dismissal.**

- **Set up a new funding mechanism for RTVS so that the funding is stable, adequate, predictable, and, as far as possible, independent of political interference.**
- **Require the Council for Media Services to regularly carry out/commission rigorous empirical analyses of the objectivity and the impartiality of the news and current affairs TV and radio programmes, and provide funding for these purposes.**
- **Enact a law to prevent political representatives from owning media companies to prevent conflicts of interests.**
- **Adopt rules for the fair and transparent distribution of state advertising and introduce a monitoring mechanism.**

Social Inclusiveness scored as a medium risk (56%). The overall proportion of women in the leadership of media organisations is low, as is the representation of women experts in news and current affairs content. Plus, comprehensive gender equality policies are lacking (even in public-service RTVS). The media literacy policy is underdeveloped and outdated, and disinformation is widespread in Slovakia (GLOBSEC, 2023). State efforts to tackle it have been hindered after the new Government made extensive staff changes in the specialised units dealing with strategic communication at several ministries and the Government Office of the Slovak Republic (Prague Security Studies Institute, 2023).

Recommendations for the Government:

- **Develop and implement an up-to-date and comprehensive action plan to increase media literacy and digital skills.**
- **Build upon previous state efforts to combat disinformation by leveraging existing staff capacity of experienced professionals.**

Recommendations for media organisations:

- **Develop and implement comprehensive gender equality policies to cover both personnel issues and programming content.**

5. Notes

- [1] For example, Boris Kollár, the former Speaker of the National Council of the Slovak Republic and the chairman of the former coalition party Sme rodina (which is not represented in Parliament after the early elections in September 2023), owns two popular radio stations (*Fun Rádio*, *Rádio Vlna*). He acquired the second radio station in 2021 while serving as Speaker of Parliament (Mediaboom, 2021).

6. References

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Marína</i>	<i>Urbániková</i>	<i>Assistant Professor</i>	<i>Masaryk University</i>	X

ANNEXE II. GROUP OF EXPERTS

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

First name	Last name	Position	Institution
<i>Ivan</i>	<i>Antala</i>	<i>President</i>	<i>Association of Radio Stations of Slovakia</i>
<i>Ján</i>	<i>Hacek</i>	<i>Associate Professor; Head of Department of Journalism</i>	<i>Comenius University (Faculty of Arts)</i>
<i>Peter</i>	<i>Hanák</i>	<i>Journalist, university teacher and researcher</i>	<i>Aktuality.sk; Comenius University (Faculty of Law)</i>
<i>Filip</i>	<i>Struhárik</i>	<i>Journalist specialising in media</i>	<i>Denník N</i>
<i>Martin</i>	<i>Dorociak</i>	<i>Executive Director</i>	<i>Council for Media Services</i>

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