Four Shades of Censorship MEDIA MARKET TRENDS AND DISTORTIONS in the Czech Republic, Hungary, Romania and Slovakia





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CZECH REPUBLIC MEDIA MARKET

edia ownership in the Czech Republic went through several major changes since 1990. Foreign owners entered the market shortly after the fall of communism. They acquired nearly all existing media and established many new titles of printed media. New TV channels and radio stations were started. Majority of their content was non-political - entertaining, that for on TV and radio market just the public service media play important role concerning new coverage and political programs.

Foreign owners transformed existing media and established new media as successful business units which brought them lot of profit. Owners of printed media focused on the quality of content as well and that for during their ownership those media served as reliable independent content providers.

After the economic slowdown in 2008 and due to rising influence of internet news media, the financial situation of media changed and most of printed media were not capable to generate as big profits as before. At the same time Czech oligarchs started to be interested to acquire media to get their content under control and to use them for the support of their business interests.

Andrej Babiš was not only one of strongest among them, he differed also in the reason for the acquisition, as his interests was not pure business but political as well. Although from some point of view it also can be understood as business interest, because his entrance to politics was led by the intention to help his business as well.

1. OWNERSHIP STRUCTURE/CHANGES

Publishers

German, French, Swiss and US owners were among those engaged in Czech media organizations. Three international publishing companies—Ringier AG, Rheinisch-Bergische Verlagsgesellschaft and Verlagsgruppe Passau—gradually gained critical mass in the Czech newspaper market. The Verlagsgruppe Handelsblatt became the last to join the group of international newspaper owners (from the 1990s onward, Zdeněk Porybný, editor-in-chief and main shareholder of the Právo daily, remained the only Czech owner).

Under foreign ownership the content was not influenced by political interests as owners had no interests on the Czech market other than their media businesses. Those ownership resulted in the shaping of the new Czech media system according to western models of journalism. The post- Communist media phase placed greater emphasis on independent reporting, developing public service media, reducing state intervention, and liberalizing the media market.

What had been a relatively stable ownership environment over nearly 20 years, started to transform radically in 2008 - after the global economic slowdown. Economic problems in the core businesses of the foreign media owners in their home countries caused an urgent need of immediate funding. This was probably the main reason for them to decide to disinvest from their businesses in the Czech Republic.

The departure took place at the onset of the impact of a global economic crisis, which reduced advertising revenues and the paid circulation of daily newspapers, resulting in the rapid expansion of Internet news services.

The major change came in 2008, when Handelsblatt exited the Czech market. Czech billionaire Zdeněk Bakala was the buyer who acquired Economia Media Company from the German owner. Needless to say, his intention was not political, but rather economical. He already owned one news weekly and wanted to broaden his scope in this area.

The key turning point in the ownership structure of Czech dailies occurred in 2013, coinciding with a major political change in the Czech Republic, and resulting in a radical re-alignment of the political, economic, and media power in the country. Czech billionaire Andrej Babiš (that time No.3 among the richest people in the Czech Republic) and his company Agrofert acquired the Mafra media group from Rheinisch-Bergische Verlagsgesellschaft. Among others, Mafra publishes the major national dailies Mladá fronta Dnes and Lidové noviny.

At the same time Andrej Babiš decided to enter the politics. In order to succeed, he decided to buy Mafra as he believed that the control over important media would be essential for his future success. In autumn 2013 Czech parliamentary election, his political party ANO obtained the second highest number, which earned ANO a place in the government and gave Andrej Babiš the positions of Minister of Finance and the Deputy Prime Minister. Many foreign sources are calling Andrej Babiš the Czech Berlusconi. But whereas Berlusconi earned money in media sector, A. Babiš spent the money in media sector to get into the power!

Through acquisition of Mafra he got control over several dailies, important websites and some other media as well. The multimedia company Mafra ranks among the strongest media company in the Czech Republic that addresses on regular basis 3.4 million readers and 7,4 million users of its internet-based projects. Thus, Babiš is considered as the first

who took-over media company to influence its content.

Switzerland-based Ringier Axel Springer AG exited the market before the end of 2013. Its place was taken by J&T, a Czech-Slovak investment group, or to be precise, its members Daniel Křetínský and Patrik Tkáč who launched Czech Media Invest company As a result, they became the owners of Blesk, the biggest Czech daily. And moreover 3 more dailies, 45 printed magazines and supplements and 30 online magazines.

The last of big international newspaper owners, Germany!s Verlagsgruppe Passau, which controlled the regional newspaper market and part of the magazine market, sold its holdings in the Czech Republic in August 2015. Penta, a Czech-Slovak investment group, which had tapped the Slovak media market earlier in 2014 and announced its media expansion in Central and Eastern Europe became the new owner. The acquired VLM media company publishes 70 regional dailies and dozen of weeklies.

As a result, the ownership structure of Czech newspapers in two years changed completely. For Czech newspapers, owned primarily by international media companies for 20 years, 2013 marked a radical shift to ownership by large Czech-Slovak business groups, some of which were involved in politics. This also signified transition to a different type of ownership; from what Jeremy Tunstall and Michael Palmer call "pure" media owners, whose holdings are restricted to media, to what they call to industrial/ media owners, whose holdings extend into industries other than media (Tunstall and Palmer, 1991).

To be totally precise, there is one more daily on the market - the left-wing Právo (with its news website novinky.cz) owned by Borgis company. The majority owner of Borgis is Zdeněk Porybný, the minority stake acquired in 2013 Seznam.cz, internet and media company owned by Czech IT mogul and billionaire Ivo Lukačovič.

Overview of Czech newspapers

Owner	Media Company	Newspapers	Non-Media Business	Readership share of newspapers
Agrofert (Andrej Babiš)	Mafra	Mladá front Does, Lidové noviny, Metro	chemistry, agriculture, food processing, forestry and timbering, renewable resources and fuels, technologies	33%
Czech Media Invest (Daniel Křetínský, Patrik Tkáč)	Czech News Center	Blesk, Aha!, Sport, E15	banking, financial services, energy business, real estate	38%
Penta (Marek Dospiva, Jaroslav Haščák)	Vltava - Labe - Media	Deník	healthcare, financial services, retail, manufacturing, real estate	17%
Zdeněk Bakala	Economia	Hospodářské noviny	corporate finance, M&A, corporate management, public relations and marketing	4%
Zdeněk Porybny, Ivo Lukačovič	Borgis	Právo	none	8%

Source: Readership based on Media Projekt - continuous survey made by agencies

Median and STEM/MARK for the Association of Publishers.

Speaking about the new media landscape in the Czech Republic, we are using the term "oligarchisation". But is necessary to add that a billionaire is not necessarily an oligarch. Who is and who is not an oligarch? A strong player who uses political contacts and business ties - often gained before 1989 - transfers government property to himself and makes money doing business with the state. Thus he need to influence politics, media and the public for his business interests.

After Andrej Babiš and other Czech oligarchs entered the media market, the situation of Czech journalists changed as well. Some of them got used to it and are writing in accordance with the instruction or guidelines of their owners (censorship, self-censorship). Some of them were fired or left because they did not want to work for the new owner.

But one positive thing arouse: a couple of journalists decided to quit their managerial positions at the newspapers and start their own media project. They argument that it would be difficult to exercise their profession with integrity and credibility with a political player as owners and they launched their new independent (digital) products (Dotyk, Echo 24, Forum 24, Neovlivni, Hlidaci pes, Reporter - see: 3.1.8 Online/Social Media - Independent Media Projects). The owners of those independent project are the respected senior journalists and personalities of Czech media sector. As for the business models of these media: operating expenses are very low. Editorial teams are composed most often of less than 10 employees and they do not have much other fixed costs.

To finalize the owners of different print and internet products, we need to add a few more publishers that are focusing at the magazines mainly and with only one exception (Burda International - that publishes over 40 magazines mainly women magazines), the owners are again the local players.

Unfortunately, majority of them are as well connected with scandals and problems.

Jaromír Soukup is the owner of Empress Media Group (Chinese company CEFC invested into it in 2015) which publishes a range of news and gossip magazines. Moreover, he is the owner and chief presenter of the country's most controversial television channel TV Barrandov. Most of his programs have a political theme and some have been investigated by the Council for Radio and Television Broadcasting in the past for imbalanced pre-election coverage (pro-Kremlin, anti-immigration stance). In 2019, Soukup announced the creation of his own political movement. But it is not active any more.

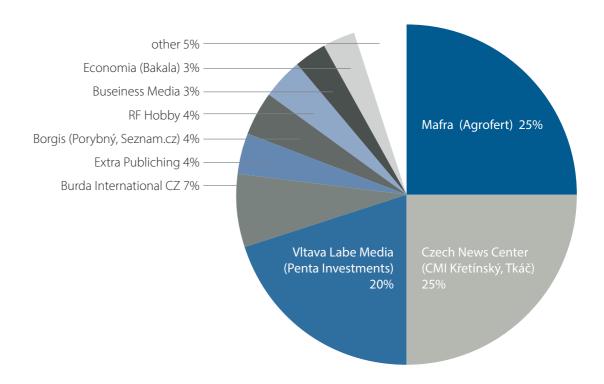
František Savoy was the owner of Mladá fronta publishing house until recently. Mladá fronta published a print business weekly and car and kids magazines with their online version, and books. Savov escaped into UK few years ago and is wanted in the Czech Republic on the suspicion of tax evasion and money laundering going into the hundreds of millions of crowns. Last year Mladá fronta got into bankruptcy and all divisions were sold in an auction. Pavel Boušek is the new owner of economic daily and magazines, traditional book publisher Albatros Media bought the book division of Mladá fronta.

Ivo Valenta (Czech billionaire, owner of big lottery company and Member of Senate) and Michal Voráček (former CEO of Ringier Czech Republic) are the owners of manipulative web sites company Our Media. It publishes Parlamentní listy - a website with the wide range content of political news and opinions. Its content is mostly manipulative.

Pavel Kvoriak is the owner of RF Hobby (publishes more than 70 magazines - mainly women, historic, army, paparazzi magazines) and PK 62 (erotic magazines).

Share of publishers on readership:

Print Media Market, share 12-79%



Source: Readership based on Media Projekt - continuous survey made by agencies

Median and STEM/MARK for the Association of Publishers.

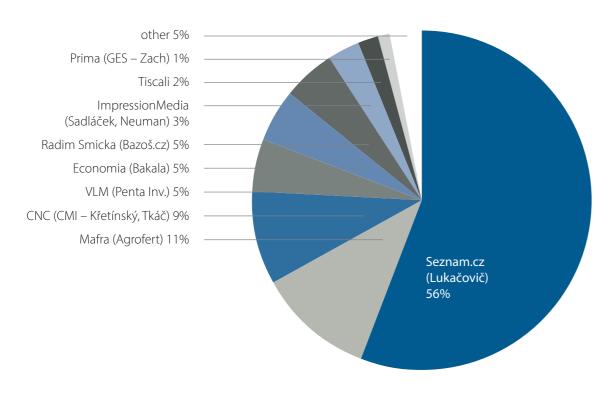
Seznam - leading search engine and media company

Ivo Lukačovič is the Czech IT mogul who nowadays has a strong media division. Seznam (=index) started in 1996 as a private search engine established by then a student Ivo Lukačovič who was inspired by yahoo.com - that time a leader among search engines. After having been mainly a search engine for most of the time since its launch Seznam started to enter step by step other businesses. Nowadays, Seznam has strong news division - it runs its own news-website called seznamzpravy.cz and it has also a terrestrial television named TV Seznam.

Czech Republic is one of only few countries where Google is not the dominant search engine, but Seznam is.

Share of internet on page views (%),

(Facebook and Google are not included)



Source: Results from Netmonitor by Gemius S.A. for SPIR (Association for Internet Development)

Television and Radio Market

Commercial TV market is now fully controlled by Czech owners as well.

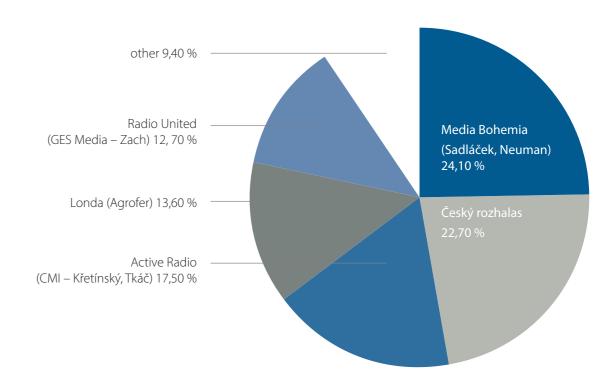
PPF company (owned by the richest Czech, Petr Kellner, who tragically died in March 2021) is taking over the country's most popular TV station, Nova. The purchase of Nova operator CME by PPF Group will also give it control of a number of other channels in the region. However, critics say the move is politically motivated and have warned of a new danger to press freedom. PPF's operations span finance, telecommunications, biotech, real estate and engineering. Its Home Credit Group unit is one of the largest consumer lenders in Central and Eastern Europe, and has expanded into China, Vietnam, India, Indonesia, the Philippines and Kazakhstan.

Although it does not seem so in the age of the Internet, TV's is still the media with the greatest impact, especially their news programs. The main political actors (PM Andrej Babiš, Pro-Kremlin President Miloš Zeman, xenophobe Tomio Okamura or the Communists) are well aware of this and are using commercial TVs (TV Nova, TV Prima and TV Barrandov) to address their electorate. TV Nova is quite often neglecting the scandals that are connected with PM Andrej Babiš and his conflict of interests.

The similarities you can find in the case of TV Prima, the second biggest commercial channel in the Czech Republic. It is the only TV who his having the interviews with president Zeman, as the moderators are not asking the unpleasant questions. Its coverage in general is highly unbalanced (anti-imigration stance etc.) and it has been criticized few times by the regulator. The owner of TV Prima is Ivan Zach, a Czech billionaire who is active in real-estate and machinery industry. Apart from TV Prima (a total of nine television stations,

including the CNN Prima News), Zach also owns other media: Playboy magazine, the Kiss and Country radio network, as well as the alternative Radio 1. Moreover, he is the owner of the Media Club (originally Radio United Services), which represents over 44% of Czech radio stations at the advertising

Radio Market Share, share 12-79%



Source: Share on the listeners marked based on Radio Projektcontinuous survey made by agencies Median and STEM/MARK

Speaking about radio market, a shift in favor of domestic ownership occurred within the radio market, too.

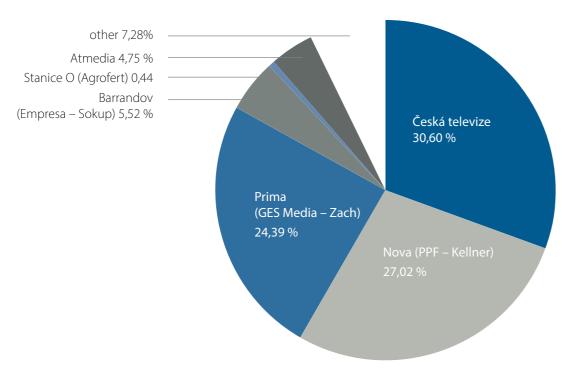
French company Lagardère sold its assets – the nationwide commercial stations Frekvence 1 and Evropa 2, and several other local stations – to Czech Media Invest, namely Czech Radio Center, controlled by one of the richest Czech businessmen Daniel Křetínský. The transaction involved Lagardère's radio stations in other Central and Eastern European countries, as well as its many French magazines, including the popular brand Elle. Křetínský's expansion in the French market continued with the purchase of the news weekly Marianne and a minority stake in the legacy newspaper Le Monde, which sparked concerns about the impact on editorial autonomy among French journalists.

Andrej Babiš and his Agrofert company owns a company Londa which with its stations represents more that 10% market share. Above mentioned Ivan Zach, the owner of TV Prima, has in his media portfolio Radio United Broadcasting, which represents aprox. 13% market share.

No. 2 among radio station players is Media Bohemia Holding owned by Daniel Sedláček and Jan Neumann. Sedláček is a matador in the field of radio broadcasting as he was among the few people who created the Czech radio market just after the Velvet Revolution in 1989.

Fortunately, Public Czech TV and Public Czech Radio are still playing an important role as a safeguard of democracy. There are a couple of investigative programs, debates, professional news break (in comparison to private TV stations). But the situation can change quite quickly (Czech TV Council - body that controls the activities of Czech Television, named by MPs, may become the tool of politicians).

TV Market, share 4+ (%)



Source: Figures for TV market from Peoplemeter measuring realised by Nielsen ADMOSPHERE.

2. MARKET CONDITIONS AND LAWS

Existing Czech media environment was formed in early 1990s just after the fall of communist regime in Czechoslovakia. Communist control over media was removed and replaced with - to a large extent - liberal conditions. There is no state control over starting a publishing business, over practising journalistic profession etc.

Freedom of the Press and Speech

Freedom of the press and freedom of speech are guaranteed by the 1992 Constitution, i.e. Charter of Fundamental Rights and Freedoms. In Division Two of the Charter, Article 17, these rights to freedom expression are defined. However, the Charter prohibits speech that might infringe on national security, individual rights, public health, or morality.

Article 17

- 1. Freedom of expression and the right to information are guaranteed.
- 2. Everybody has the right to express freely his or her opinion by word, in writing, in the press, in pictures or in any other form, as well as freely to seek, receive and disseminate ideas and information irrespective of the frontiers of the State.
- 3. Censorship is not permitted.
- 4. The freedom of expression and the right to seek and disseminate information may be limited by law in the case of measures essential in a democratic society for protecting the rights and freedoms of others, the security of the State, public security, public health, and morality.
- 5. Organs of the State and of local self-government shall provide in an appropriate manner information on their activity. The conditions and the form of implementation of this duty shall be set by law.

Defamation is still a crime in the country, but prosecutions are rare, and courts have generally given only suspended sentences in recent years. A 2005 Constitutional Court ruling clarified defamation legislation, finding that value judgments are legally protected.

The Press Law (No. 46/2000) provides a sound basis for independent journalism, and media protections have been bolstered by Constitutional Court decisions and other institutional rulings. Freedom of information is provided for under the law.

Other important regulations are the Act on Czech Television (No. 483/1991) and the Act on Czech Radio (No.484/1991). Both went into force in 1991 and have been amended several times. They provide councils that control public service media - Czech Radio and Czech TV.

The Free Access to Information is guaranteed by the Law No. 106/1999 which nevertheless doesn't give any special rights to journalists concerning access to information. The law defines procedures how to obtain information for every citizen.

Competition and Ownership

In the Czech Republic, the main legislation covering the area of economic competition is the Act on the Protection of Economic Competition. The Competition Act became effective on 1 July 2001.

Cross-ownership in the media industry is legally limited under the Law on Radio and Television Broadcasting No. 231/2001, which defines the license and regulation policy for broadcasting and the role of the regulatory body - The Council for Radio and Television Broadcasting (RRTV).

However, these ownership restrictions do not apply to foreign ownership and are considered to be minimal.

There are no specific thresholds to prevent a cross-ownership between the different types of media. None of the Broadcasting Act, the Press Act or the Act on the Protection of Competition contains any limits on cross-media ownership. The decisions of the Office for the Protection of

Competition always depend on the definition of the "relevant market" which allows for high degree of flexibility in interpretation. The unavailability of certain figures (e.g. market share of the Top4 owners across the different media sectors) also contributes to the high level of risk for this indicator.

Copyright

The discipline regarding copyright is provided by Law No. 121/2000. The law is based on principles of continental law and is inspired by German and French bills. It reflects international agreements and the law system of EU.

GDPR

Media are effected by new EU GDPR regulations which were implemented in The Czech Republic by the Law No. 110/2019. It influences the way how publishers have to maintain their databases of subscribers and how web providers have to deal with readers data.

Advertising

The Law No. 40/1995 regulates advertising. This Act incorporates the relevant regulations of the European Union governing the regulation of advertising that constitutes an unfair commercial practice, comparative advertising, advertising of tobacco products, of medicines for human use, veterinary medicines, for food and initial and follow-on baby food formulas, and regulates the general requirements for advertising and its dissemination, including penalties for breach of obligations hereunder and the establishment of supervisory authorities. It also regulates advertising for alcoholic beverages, products for plant protection, firearms and ammunition, and funeral activities. It effects advertising in all media sectors - print, radio, TV and internet.

The law bans the advertising of goods, services or other performances or values, whose sale, provision or dissemination is in conflict with the law, an advertisement that constitutes an unfair commercial practice and sets other limits. Advertising must not be contrary to good morals, they may especially not contain any discrimination on grounds of race, gender or nationality or attacking religious or national sensibilities, threaten morality in a generally unacceptable manner, reduce human dignity, contain pornography or violence. Advertising may not challenge political beliefs.

Advertising of tobacco products and also sponsoring, the purpose or the direct or indirect effect of which is advertising for tobacco products, are prohibited. Comparative advertising on medicinal products intended for administration to humans or on health services is admissible subject to the conditions laid down by the Civil Code if it is directed at persons entitled to prescribe or supply such medicines or provide such health services.

Taxes

Czech VAT is charged at three rates.

The standard rate of 21 % on the sale of goods and services.

The first reduced rate of 15 % on the transfer of certain residential houses, on the sale of certain goods such as food, gas, etc. and certain services such as waterway, accommodation, air transport of passengers, certain cultural activities etc.

The second reduced rate of 10 % on the pharmaceuticals used for health care and also for sale of books, magazines and newspapers both printed and on-line.

Advertising is taxed by the standard rate of 21%.

In 2018 Czech government implemented the change of the law which cancels the possibility for media of public service to deduct the VAT. This possibility was implemented for PSM the previous year to give them the same possibilities as commercial media have. Thus public broadcasters could claim VAT back on goods and services to the same degree as commercial radio and TV stations.

Government explained the cancellation of VAT deduction for PSM by the EU regulations which according the government doesn't allow it and that the amendment will end a discrepancy between Czech law and European Union legislation. However, the Czech Television chief said the amendment breached a principle agreed with the government under which it was to invest savings made on VAT into the station's shift into DVB-T2 digital broadcasting until the year 2021. The CEO of Czech TV said that if the government did not offer some form of compensation the change would impact Czech TV's digitalization process and asked the Czech PM to support him and to proceed with the deduction of value added tax after 2021.

Czech TV calculated that this change will cost it up to 400 mil CZK (15 mil €) per year and Czech Radio 120 mil CZK (4.5 mil. €) per year.

The income tax for companies in The Czech Republic is 19% and relates to media as well.

3. ADVERTISING TRENDS

NET media investments on the Czech media market in 2019 were increasing vs. 2018 (ix.104,1), but the pace of growth was lower than in 2018. The main drivers of the growth were: TV (+6,8%) and online advertising which is growing mainly due to performance formats, programmatic buying models, i-video and rich formats, while standard banner advertising is rather stagnating. Also investments into social media and influencers' activities increased in 2019.

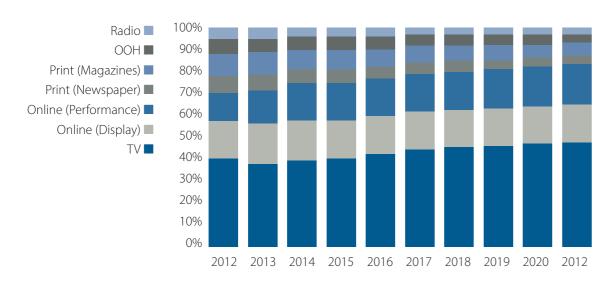
Also radio advertising was growing slightly in 2019 (0.5 %) after previous years of decline. On the contrary investment in print is falling continuously. In 2019 it dropped - 2.5 %, in 2018 -1.3 %. Out of home (OOH) advertising investments dropped as well (-2.5 %).

Total gross expenditures was CZK 92,1 mil. (€ 3.5 mil) in 2018 and CZK 105 mil. (€ 4 mil.) in 2019. Which represented increase of 14.2%.

In 2020, Czech advertising market was highly effected by the Covid-19 global crisis. Print and radios suffer from the biggest y-y drop. This loss of revenues highly effects economy of the media industry which was weak anyway. Publishers and other media companies reacted immediately with organizational changes. Some magazines were stopped and staff cuts were introduced.

Czech advertising market is dominantly operated by global advertising media groups. That for Czech advertising industry is effected by the economy and media slowdown in a same way like in other developed countries. Nevertheless, there is one local Media Agency Medea which has the highest Market share (13,6 %) according Recma (international agency). Medea is nearly 30 years on the market. Currently is co-owned by Czech owner Jaromír Soukup and Chinese investment group CITIC. Jaromír Soukup who at the same time owns TV station Barrandov and couple of magazines is known for using his media power for support of his political goals.

Media MixNet estimation Advertising Expenditures



Source: Media mix forecast by Group M Czech Republic

In 2019 OMD and Mediacom (Group M) shared position two and three. PHD was on position four and Wawemaker was fifths according Recma.

Retail chains, financial sector, car manufacturers, food&drinks and pharmaceutical products were the top advertisers in media.

4. STATE ADVERTISING

Advertising of ministries and organizations controlled by the government as well as advertising of political parties plays a special role on the Czech market.

Main spenders fully or partly controlled by the government are Czech Post, Czech Railways, ČEZ (electricity provider), Czechtourism, Czech Trade. In the past it was also Czech Telecom, Czech Airlines but they are not owned by the state anymore.

In the past most of these special advertisers were represented by the only non-global media agency Medea which was also buying advertising space for political parties. On contrary with the global media agencies, privately owned Medea was not subject of any external control concerning following of ethical and professional standards. That for, it was only on the decision of the owner which price he will ask to be paid by his clients. His clients' list allowed him to offer cross financing, so for instance company controlled by politicians could advertise for higher prices than their own political party. Nevertheless, due to absence of external control no such suspicion was ever proved.

Other misusing of advertising money of state controlled bodies is the selection of media where the advertising goes. It rarely goes directly to any media, but the usual way is to use media agency as the company which officially makes the selection of media. This principle is hard to criticize as it resembles the way how commercial companies do it. Nevertheless, in the case of state advertising it allows the above described misuse of the state money and it also camouflages the selection of media because the responsible state agency may always say the selection of media was done by the media agency with their professional methods. In reality the media mix which is composed by the agency may intentionally include media recommended by the state agency as well as omit others.

There is no summarized information concerning state advertising and state money in total going to media. The monitor of Nielsen Admosphere may be used but it may work only with standard formats and price list prices. Due to our knowledge that this advertising intentionally uses non-standard formats and is not sold for standard prices and even not with standard discounts, it is hard to compare advertising based on standard monitoring.

In May 2020, a Czech reporter Markéta Chaloupská published an investigative article on the web of Czech Radio iRozhlas.cz about advertising spendings of Czech Railways in Mafra group media company (owned by the trust fund of Czech PM Andrej Babiš). She discovered that since 2015 this state owned company spent over CZK 112 mil (€ 4.2 mil) for promotion in the Mafra group

(owned by the trust fund of Czech PM Andrej Babiš). Most of these spendings were paid without any tender. Czech News Center, the competing publishing group with even bigger market share in the same time got only CZK 17 mil (€ 640 K) from Czech Railways. Shortly, Czech Railways spent seven times more on advertising in Mafra publications than in the country's other similar sized media company the Czech News Centre. Former CEO of Czech Railways told to the journalist that it was demanded to buy the advertising from Mafra. With no discussion. He admitted that there was clear interest in Mafra to receive biggest ad deals. Former minister of transport said that PM Babiš was giving his orders to the CEO of Czech Railways directly himself.

Other investigative web site investigace.cz (investigation) published series of 14 articles by Hana Čápová and Eva Kubániová focused on state advertising in 2019. They addressed their requests based on Free Information Act to 14 governmental resorts and they got answer from 12 of them. Ministry of Agriculture and Ministry of Regional Development refused to answer for free.

Journalists discovered that the strategy of spending is often influenced by the minister himself. For instance, they write about the case of Environment Minister Tomáš Chalupa (ODS party) who decided in 2011 that the most of the advertising budget of his ministry will be given to the Young Conservatives organization to provide "room for independent exchange of opinions".

Authors of the article also revealed that ministers of Social Democratic Party who are coalition partners and members of government of Andrej Babiš decreased spendings to Mafra group and in return increased spending in Parlamentní Listy which are often criticized for publishing pro- Kremlin opinions, manipulative articles and fake news.

From figures provided, Ministry of Education spent the biggest amount in 2015 for promotion of EU programmes. It was nearly CZK 80 mil. (€ 3 mil). Distribution of advertising money during the years 2014 - 2018 spent by this ministry may be generally seen as fair enough.

Ministry of Interior spent nearly no money on promotion over the observed period. Altogether only about CZK 9 mil (€ 340 K) during 9 years. Ministry of Foreign Affairs had no advertising at all nearly in all observed years. In other years it was minimum. Also Ministry of Justice showed nearly no advertising during 2010 - 2018. The exception was 2014 and 2016 - total spending of CZK 1.3 mil. (€ 50K.) was spent in Mafra group (owned by the trust fund of Czech PM Andrej Babiš).

Ministry of the Environment and Ministry of Labour and Social Affairs were also among ministries who declared no ad spendings in last years. But in the case of the second one, it is due to the fact that only ads bought by the press department of the ministry were disclosed. Information about advertising connected with the EU programme Employment was not reported to the journalists. Ministry of Culture has no ad money in its budget, so it is not advertising at all.

Ministry of Finance in most of observed years reported only a minimum advertisement - probably just those announcements that are required by law. Only in 2013 and 2017, the advertisement was significantly higher. In 2017, part of ad money was spent in Radio Impuls which was in 2013 acquired by Andrej Babiš. In 2017 Andrej Babiš used to be the minister of finance. Nevertheless, no more detailed figures concerning the amount of money spent in Radio Impuls was provided by the ministry - with explanation that it was distributed through the media agency. Total money spent by the ministry in 2017 was CZK 5.8 mil. (€ 220K).

Over nine years, Ministry of Health showed higher ad spending only during two years. In 2014 and 2015, total amount of CZK 35 mil. (€ 1.3 mil.) was spent on the anti-cancer campaign. 44 % of total ad costs went to Mafra group. Parlamentní Listy was the second largest advertising medium for the Ministry of Health with 16 % rate.

The advertising strategy of Ministry of Industry and Trade changed in 2015 where the ministry was under the supervision of the Social Democratic Party. Nearly all money went to Parlamentní Listy. Nevertheless, yearly ad spending all together were less than CZK 0.5 mil. (€ 19K) yearly.

Ministry of Defense changed its advertising strategy as well and started to advertise since 2016. However, total spending for 2016 - 2018 even in this case were only CZK 7,3 mil. (€ 270K). From the printed media - other than internal PR ones - most of advertising money flew to Mafra group.

Ministry of Transport shows the history of a significant advertiser compared to other ministries. In 2017, it spent CZK 15.6 mil. (€ 585K), which was the highest amount in the observed period. Most of the money (64 %) went to commercial televisions - TV Prima and TV Nova. The rest was divided among big publishing houses and other media.

In 2020, the government needed to promote the fight with Covid 19. Before the campaign started, the government was urged by both Czech and international media association like International Press Institute or European Federation of Journalists to spread the budget of the campaign among all media industry and not to omit independent media. Despite this appeals the government placed all ads only to selected media which are either directly part of the PM Babiš's blind trust fund or at least are not critical to the government.

5. FINANCIAL PERFORMANCE OF MEDIA COMPANIES

TV Nova, internet company Seznam.cz and TV Prima Group belong to the three strongest media on the Czech market according to the size of sales revenues in 2019.

Revenues of Nova rose to CZK 5.45 billion (EUR 210 M) in that year, Seznam.cz reached CZK 4.7 billion (EUR 180 M) and FTV Prima CZK 3.28 billion (EUR 130 M). Thus we can state, that televisions in general and "Czech Google - Seznam" are the most successful media sector in the Czech Republic. In case of commercial TV's, the main source of income is still revenues from television advertising, which increased by 6% year on year last year. As for Seznam, the business model is quite easy: Seznam participates on news-providers' advertising revenues.

On the other hand, the traditional publishers are facing the economic troubles - their circulation, sales and ad revenues are gradually falling down since 2008 economic recession and because of the digitalisation. Media advertising gains are pouring into the pockets of technology giants, and large publishers are unable to come up with business models for the digital age. The situation is worsened by a society's distrust to classical institutions, such as media houses.

The most successful media publishing house in the Czech Republic is Mafra group, now a part of a trust fund that belongs to Czech PM Andrej Babiš. Last year, the media group Mafra, which acquired the Bauer Media publishing house a year earlier, also exceeded CZK 3 billion in sales.

However, the comparison of media companies according to their turnover is complicated as different companies are using the consolidated bookkeeping for the entire group - specifically in the case of Vltava Labe Media, printers are also included in the result.

	Media House	Owner	Sales Revenues 2019 (T CZK)	Sales Revenues 2019 (T EUR)	Comment
1	TV Nova	PPF (Kellner)	5 453 979	213 882	
2	Seznam	Seznam (Lukačovič)	4 690 242	183 931	
3	FTV Prima	GES Media	3 275 130	128 436	
4	Mafra	Agrofert (Babiš)		118 740	
5	Vltava Labe Media	Penta (Dospiva)	2 120 885	83 172	
6	Czech News Center	Czech Media Invest (Křetín- ský)	2 039 186	79 968	
7	BigBoard Praha	JOJ Media House (majority owner)	1 265 343	49 621	
8	Economia	Economia (Bakala)	740 967	29 058	
9	Barrandov TV	Empresa Media (Soukup)	645 050	25 296	2018
10	O2 TV	PPF (Kellner)	636 902	24 977	
11	Czech Print Center	Czech Media Invest (Křetín- ský)	635 513	24 922	2017
12	Borgis	Borgis (Lukačovič)	614 978	24 117	
13	Burda International	Burda Eastern Europe	506 625	19 868	
14	Empresa Media	Empresa Media (Soukup)	383 058	15 022	2017

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	Media House	Owner	Sales Revenues 2019 (T CZK)	Sales Revenues 2019 (T EUR)	Comment
15	Europlakat	JCDecaux	273 602	10 729	
16	JCDecaux Městský	JCDecaux	266 999	10 471	
17	Rencar Praha	JCDecaux	231 546	9 080	
18	Active	Czech Media Invest (Křetínský)	159 687	6 262	
19	Stanice O	Agrofert (Babiš)	152 313	5 973	
20	Londa	Agrofert (Babiš)	133 013	5 216	
21	Evropa 2	Czech Media Invest (Křetínský)	103 674	4 066	
22	Our Media	Synot Invest Limited	100 826	3 954	
23	Frekvence 1	Czech Media Invest (Křetínský)	95 042	3 727	2018
24	Media Bohemia	Media Bohemia	78 378	3 074	
25	Radio United Broadcasting	GES Media	76 623	3 005	

Source: www.mediaguru.cz:

https://www.mediaguru.cz/clanky/2021/02/obratove-nejsilnejsi-media-v-cesku-jsou-nova-seznam-a-prima/

If you look closer at the economic result of main Czech publishers owned by Czech moguls, they are generating the billions revenues, but finally end in red figures - therefore in losses. Economia (owned by Zdenek Bakala), VLM (owned by Penta) and CNC (owned by Daniel Křetínský) are doing a special accounting operations. When buying the companies, they financed it by taking banking loans and used the publishing companies such a warranty. Now they are repaying their debts by current profits of their media groups.

Because of the COVID 19, the situation will be much worse as far as the revenues and profits. The professional association of the press - Union of Publishers - calculates that in last year 2020, the shortfalls in advertising sales and sales of newspapers and magazines reached almost two billion CZK due to the coronavirus pandemic.

If you take the independent projects, it is necessary to say that they are doing their best to succeed on the market, but this is really difficult for them. They cannot used the advantage of a strong and well-off owners, they do not have a huge editorial teams or other divisions that would support their sales, ads or promotions. As for the business models of these media: operating expenses are very low. Editorial teams are composed most often of less than 10 employees and they do not have other important fixed costs. A healthy portion of revenues come from advertising and from different kinds of crowd funding activities, grants and donations - predominantly from domestic sources. Foreign donations (popular in some other countries) are not documented.

If you look closely at their figures (if published), they are aggregating the revenues of a couple of millions CZK (which is a small fraction of results that traditional big publishers have. The break- even comes most often after 3-5 years of existence but hardly exceed million CZK.

Radio companies are reporting profits - thanks to ads and because their salaries as well as other costs are quite low.

6. INFLUENCE OF ONLINE AND SOCIAL MEDIA

Over 7 million Czechs are on the internet (81 %). Over 6 million of them are using internet on the daily basis.

Average time spent on the internet is 143 minutes per day. Number of people according to networks:

- Facebook 5.3 million
- Instagram 2.3 million
- LinkedIn 1.6 million
- Twitter 389 thousand
- Snapchat 615 thousand¹

There are several aspects why online media play exceptional role on the Czech media scene:

Role of seznam.cz

Czech Republic is one of only few countries where Google is not the dominant search engine. Historically, domestic venture Seznam (=index) plays this role. Seznam started in 1996 as a private search engine established by then a student Ivo Lukačovič who was inspired by yahoo.com - that time a leader among search engines. For a long period of time, Seznam was equal to the whole internet for many Czech people. It was similar what Google means for some people today. After having been mainly a search engine for most of the time since its launch Seznam started to enter step by step other businesses. Nowadays, Seznam has strong news division - it runs its own news-website called seznamzpravy.cz and it has also a terrestrial television named TV Seznam.

Moreover, Seznam plays another important role on the news-media market. It offers to other content providers placing their articles on the home page of Seznam and thus securing them high increase of their readership rate. The business model of seznam in this case is pretty clear.

Seznam participate on news-providers' advertising revenues. Especially for smaller companies, like independent media projects, it is attractive as otherwise they are not able to reach high traffic and revenues by themselves. Simply: they are reaching higher traffic and the costs they pay to Seznam is about the amount they do not get without Seznam anyway. Nevertheless, this approach has started a vivid discussion. The main issue is if the cost for the whole media market is not too high as this model is strengthening the Seznam'a market position and the company becomes by far the strongest internet company on the Czech market.

Independent Media Projects

Since 2008, the most Czech newspaper publishers have changed its ownership. For many years, foreign (mostly German) publishing companies were the owners of Czech media companies. Nevertheless, after the financial crises, they started their disinvestment process. Foreign media professionals were replaced by Czech oligarchs whose core businesses are outside media business. The most important change happened in 2013. The most influential news publishing house Mafra was acquired by Andrej Babiš, the second richest

person with monopoly over a few sectors, who made money thanks to doing business with the Czech state, Slovak oligarch who decided to enter politics. His decision to buy the influential newspaper was quite clear - he needed media to help him to start his political career and to discredit his opponents.

And it did help. He won the election and became the prime minister.

Many leading journalists refused to stay in Mafra publishing house after the change of the owner. They considered it as the end of its independence. Couple of them started their own news web- sites and printed magazines as well. After several years, these small and independent media outlets create a significant part of Czech media scene and got an important reach of the readership market. Their traffic is (also thanks to Seznam - see above) comparable with traditional news media houses they left before.

As for the business models of these media: operating expenses are very low. Editorial teams are composed most often of less than 10 employees and they do not have other important fixed costs. A healthy portion of revenues come from advertising and from different kinds of crowd funding activities, grants and donations - predominantly from domestic sources. Foreign donations (popular in some other countries) are not documented.

Entering of Czech oligarchs into media business and the "oligarchisation" of domestic media scene provoked another reaction and the launch of another important non-profit organization - Endowment for Independent Journalism. It was formed by number of successful Czech entrepreneurs who care for press freedom in the country and want to help to finance independent media outlets. Yearly, this non-profit organization raises about 10 mil. CZK (350 T€) which is then granted to support independent journalism. All the money flow is transparent and under public control.

Denik N daily is a special case among independent media. It was initiated by Slovak Dennik N and is being funded as a non-profit project by a group of (less than 10) Czech entrepreneurs directly.

Denik N provides a paid news website and a printed daily paper. Differently from other independent projects, it has a large editorial team (of about 60 people) which means its costs are several times higher. Despite the large editorial team and high costs, its market share is extremely limited as it has no free content and the market is highly competitive and offers a lot of free news websites (made as well by independent journalists) While in Slovakia Denník N has already a small profit, its Czech daughter company is still in red figures.

Media started by leading journalists who left media after they had been acquired by oligarchs

Medium	Form	Publisher	Editor	Figures
Forum 24	News web	Pavel Šafr	Pavel Šafr	1.8 M RU
Echo 24	News web	Dalibor Balšínek	Dalibor Balšínek	1.8 M RU
Reportér Magazín	Monthly	Rober Čásenský	Robert Čásenský	25 T sold copies
Hlídací pes	News web	Robert Neumann	Robert Břešťan	300 T RU
Echo 24	Weekly newsmagazine	Dalibor Balšínek	Dalibor Balšínek	Thousands
Revue Forum	Monthly	Pavel Šafr	Johana Hovorková	Thousands
Neovlivni	Investigative web	Sabina Slonková	Sabina Slonková	N/A
Investigace	Investigative web	Pavla Holcová	Sabina Slonková	N/A
Deník N	News web (pay)	Ján Simkanič	Pavel Tomášek	20 T subscribers
Deník N	Printed daily	Ján Simkanič	Pavel Tomášek	Thousands

Before starting their own media, these senior journalists were in following positions:

- Robert Čásenský, editor-in-chief of Mladá Fronta Dnes, acquired by Andrej Babiš.
- Dalibor Balšínek, editor-in-chief of Lidové Noviny, acquired by Andrej Babiš.
- Sabina Slonková, editor-in-chief of Mladá Fronta Dnes, acquired by Andrej Babiš.
 (She was named the editor-in-chief of Mlada fronta Dnes daily after Robert Čásenský left, but she left herself few months later).
- Pavel Šafr, editor-in-chief of Reflex, acquired by Daniel Křetínský, ex-editor in chief of Mladá Fronta Dnes, Lidové Noviny and Blesk (first two acquired by Andrej Babiš, the third by Daniel Křetínský).

Disinformation Outlets and the resistance against them

In the Czech Republic, the media ecosystem is plagued by disinformation. The shadow of Soviet- era influence still looms large over the Czech Republic. Recently, it has experienced a spate of disinformation and fake news — a blend of pro-Russian propaganda and anti-EU rhetoric.

According to various estimates, the Czech-language disinformation outlets reach about 10% of the country's population. Some of them (Sputnik) are openly financed by the Russian government, some of them seems to work "independently" and are being financed by advertising. The financing and management of others is unclear. Nevertheless, they all spread news sourced from disinformation channels in Russia and supporting generally two goals. Supporting direct Russian interests and subverting democratic order of the country.

Although the Czech Ministry of the Interior works for internal purposes with a list of Czech- language disinformation outlets, there is still no official body in the country to identify which websites spread disinformation, let alone shut them down.

There are several governmental bodies which tries to map and oppose these activities but it is not effective as they are - in most cases - not directly breaking any laws. They are



also private initiatives opposing disinformations like several web sites (deziformatori.cz, manipulatori.sk and others) which disclose individual cases of lies and misinformation.

An initiative named "Czech Elves" publishes its monthly reports on trolls activities and disinformation outlets. First appearing in October 2018, the Elves are dedicated to rooting out and debunking Russian propaganda, misinformation and fake news in the Czech Republic. Inspired by counter-disinformation movements in the Baltic states, their ranks include people from all walks of life — from doctors and students to members of the military. Like other fact-checking organizations, the Elves spend a great deal of time poring over suspicious online articles and social media posts. In addition to monitoring individual accounts, the collective routinely challenges disinformation from larger outlets, such as Sputnik News and the news site Aeronet.cz. Advertising agencies formed their own initiative called "Nelež" ("a non-lie") which offers to advertisers to be excluded from disinformation outlets in their campaigns.

Endowment for Independent Journalism (NFNZ) funded several initiatives fighting against disinformation as well. Most importantly, it mapped the disinformation scene in "Atlas konspirací" (the Atlas of Conspiracy).

Recently NFNZ started a brand new project of "media rating" - the complex system of evaluation of media outlets, based on a large set of criteria and on classifying them to several categories.

The worst category is formed by non-reliable media outlets which have unknown owners, do not publish names of their editors, do not follow ethical and professional criteria etc. At the end of 2020, the collaboration among NFNZ and the biggest Czech search engine started. Seznam is using the NFNZ rating to "mark" those information which appear in searches and are based on those sources marked by NFNZ as "non-reliable". This draws attention of users to hesitate about such information. Since 2018, Seznam, which, like Google, runs an online advertising platform, has offered its clients the option to block their ads from appearing on websites listed by Konspiratori.sk, a public database of Czech and Slovak websites that traffic in disinformation.

The most "popular" tool of spreading false information and political propaganda has been Facebook. Many disinformation originally sourced from disinformation outlets later spread on social networks and in chain emails. Czech prime minister Babiš uses Facebook as well to address his regular weekly appeals to his supporters. Content of these "reports" are so misleading that professional media would never allow it to be printed or broadcasted as it would be breaking its own ethical rules

7. The role of the broader ecosystem in the media

The media ecosystem in the Czech Republic has been quite developed since the fall of the communist regime in 1989. Czech Publishers' Association was established already in 1991 as the first media association in post-communist countries. Other media companies - radio and TV broadcasters - followed. These associations started independent monitoring of circulations, continuous research of readership, radio listening and TV watching which followed western standards. That steps opened the Czech market for global advertisers and advertising agencies. Development of internet brought the measurement to this industry as well. All these measurements remain independent on the government and are controlled by the industry itself.

Nevertheless, as the leading players in the industry have changed its owners, it influenced the measurement indirectly.

The outbreak of coronavirus (Covid19) in 2020-21 escalated political segmentation of Czech media landscape. The health protective conditions and measures, as well as economic situation and businesses' supports were not managed properly by Czech government. The country was highly affected by Covid-19 disease and according to all figures Czech Republic was ranked the highest positions among the worse countries worldwide (record new cases per day, the highest per capita death rate etc.). On one side it worsened the economic situation of media and it increased as well the pressure on media from the side of the government not to report the situation properly and to reduce the critical coverage of the mismanagement of the Czech government.

As for commercial media landscape (print and internet), the newspapers and news websites belonging to the trust fund of the prime minister Babiš were repeatedly used to support governmental position and to publish positive news to "smooth" negative results. Moreover, PM Babiš was using Facebook to periodically speak to the nation every weekend. His presentations were carefully prepared by his PR team.

Concerning state money going to media, we should not forget that advertising is not the only way how the government may influence its money flows to private media. Because most of big publishers own printing plants, governmental and state companies printing deals are other way how money may go to selected media. Most significant case is the Mafra group (owned by the Czech PM Andrej Babiš - via his trust fund. Babiš placed the company in trust funds to avoid accusations of a conflict of interest. However, a European Commission audit did state that there is an ongoing conflict of interest despite the move.

The public service media were under high pressure as they were the main source of the latest information about the covid pandemic, the governmental response on it, the regulations, orders and prohibitions. It was typical for the Czech government to change covid rules very frequently and totally confusingly, and therefore the Czech Public TV had to provide a live coverage of the situation with experts' and politicians' interviews to explain properly the situation.

Lot of criticism was expressed against the Czech Public TV from both government and opposition. It is obvious that the Czech TV was not critical enough to the government in the scope which would be appropriate to the level of governmental mismanagement and was not critical enough in reporting about the role of prime minister Babiš in this damage. But at the same time it is necessary to say that there was lot of criticism and true reporting in TV program. So the result of the pressure was rather in the scale of the criticism rather that in its elimination. We definitely cannot call Czech TV as a part of the governmental PR weaponry as we can see it in Hungary or in Poland but at the same time we cannot mark it fully free. Paradoxically, the result of this situation may be even worse because the manipulation and distortion of information is not fully visible and recognizable.

What was just said about the PSM could be said about the Czech media scene in total. It is possible to draw the clear line between media according the ownership and to say which media belongs to oligarchs, which are public service, which are source of intentional disinformation and which are fully free. But the content cannot be categorized just and only according the ownership criterium. It is clear and may be proofed that the number of articles which are in favor of the government and the prime minister is appearing in media owned by his trust fund or those which are close to him. But it is not excluded that even these media publish critical articles from time to time, or that they may report impartially on some topics. On the other hand, only free and independent media is reporting without any pressure and covers the situation truthfully.

Although the political influence of media scene in the Czech Republic is not so transparent as in Poland or Hungary, its effect is very similar. As people are not getting the full and true information from the most of media, the political situation has worsened. Political scandals, corruption and clientelism have increased into the level far bigger than ever before. Although the prime minister himself was accused of crimes which would be never

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acceptable for Czech society and media just 10 years ago, in the current situation their media coverage is not alarming enough to prevent our PM from his political positions and from continuous support of about 25% of the electorate.

The shortage of free media is endangering not only the local political situation in the Czech Republic, but the danger is wider. Weak media are failing to face the pressure coming from the pro-Russian president. Czech president is pushing economic and political interests of Putin's Russia and is getting a full support of pro-Russian disinformation and propaganda outlets while free media are not strong enough to oppose it.

There exists a real danger that 30 years after the fall of the soviet bloc, Russians will renew their influence in the former Eastern Europe. This threat is real, serious and horrible. If it happens it will destroy the unity of European Union and NATO which guarantee the post war peaceful and democratic development in Europe.

Advertising industry in the Czech Republic is controlled by global companies. There is only one non-global company - Medea. It is owned by Czech entrepreneur Jaromír Soukup who is active in the media industry (as the owner of TV Barrandov and several printed magazines). As Medea was never under control of global media owners, it was not obliged to follow international business standards. That for it was active in business with state controlled companies and political parties. Nowadays, Medea has serious economic problems and is not clear how it will survive.

The distribution system of printed media is fully independent on the government as well and is controlled by big publishers. As the number of circulated copies drops it has problem with its performance. Printed plants are also owned by publishers and are not controlled by the government in any way. There is no problem with printing capacity nor with the quality of printing.

From the early times of the internet, the Czech Republic has its specificity in the internet search. Unlike most countries around the world, Google is not the most widely used search engine in the Czech Republic. The country also has its own, home-grown search engine — Seznam. It is still the largest search engine on the market. It also has its news desk and entertaining content which - due to the company control of searches - has a leading role among internet content providers. Seznam is owned by its founder Ivo Lukačovič who started the search engine while he was a university student in 1990th. It remains fully independent of any governmental control - and due to its financial profitability may remain independent even in the near future. The owner is not politically active, but he feels his social commitment and supports full editorial independence of the editorial team.

To summarize the role of the whole media ecosystem, we have to conclude that although there is a plenty of political interferences to the media ecosystem (mainly via PM's media ownership) and pressures on public service media (through its councils) and to media owned by some oligarchs (due to their political links), there is still a plenty of room for editorial independence. The government also doesn't control wide parts of the industry and those services and service providers which the whole industry depend on.

ANNEX 1: LIST OF COMPANIES

Television Market

Public TV

Czech Television (Česká televize) is a public television broadcaster in the Czech Republic, broadcasting seven channels. It is the successor to Czechoslovak Television, founded in 1953.

7 channels of Czech Television:

ČT1

• is a general channel, showing family-oriented program, Czech movies, children's program, news and documentaries.

ČT2

 broadcasts documentaries and nature-oriented shows such as documentary films by David Attenborough. This channel also frequently shows foreign films in the original versions with Czech subtitles, including many English-language movies.

ČT3

 broadcasts programs, TV shows, and old Czech-produced movies and oriented to the older generation. This channel was launched in April 2020.

ČT24

• is the Czech Republic's first 24-hour news channel, provides news and information around the clock with bulletins every hour.

ČT Sport

 is a sports channel, broadcasts parts of major World, European, and Czech sports events (i.e. Olympic Games, World Cups or European Championships). ČT Sport HD is the high-definition version of ČT Sport, launched on 3 May 2012 and replaced ČT HD.

ČT Déčko

• is a children's channel designed for young viewers 4 to 12 years of age and was launched on 31 August 2013. ČT Déčko broadcasts from 6 am to 8 pm, and shares its frequency with cultural channel ČT art which uses the remaining hours.

ČT art

is an arts and culture channel launched on 31 August 2013. ČT art broadcasts from 8 pm to 6 am, and shares its frequency with children's channel ČT Déčko which uses the remaining hours.



Commercial TVs

TV Nova

TV Nova is a Czech commercial television station. It began broadcasting in February 1994 as the first commercial nationwide Czech TV station.

Sister channels of TV Nova:

- Nova 2 (comedy films and TV series)
- Nova GOLD (archives films and TV series from TV Nova production, repeating) Nova Cinema (foreign films and TV series, acquisitions, reality shows)
- Nova Sport 1 (sport channel specialized on NHL, WWE, ATP, MotoGP, UEFA) Nova Sport 2 (sport channel specialized on NBA, rugby and new attractive sports) Nova Action (action movies, crime films and TV series, channel for men)
- Nova International (for Slovak market only, TV series of TV Nova own production)

TV Prima

Prima is a Czech commercial television station.

Sister channels:

- Prima Comedy Central (part of American cable and satellite network Comedy Central, specialized on comedy TV series)
- Prima Cool (premieres of new American TV series and reality shows, for young audience aged 13 40 years old)
- Prima Krimi (crime TV shows and series, channel for men)
- Prima Love (romantic series and love stories, channel for women) Prima Max (specialized on US blockbusters and foreign films) Prima Zoom (documentary and educative channel)
- CNN Prima News (news channel, CNN license, broadcasting since May 3rd, 2020)
 Prima Plus (for Slovak market only, TV series of Prima own production)

TV Barrandov

It was founded and started to broadcast in 2009. In 2015 after Chinese company CEFC China Energy invested in TV Barrandov's parent company Empresa Media, the tone of TV Barrandov's coverage of China changed with all neutral and negative reporting about China being replaced by positive reporting. Company is now being 100% by Jaromír Soukup. Sister channels:

- Kino Barrandov (films and TV series mainly from abroad genre: romantic, crime, western, sci-fi, family, comedies)
- Krimi Barrandov (crime tv series of its own production mainly) Barrandov News (unprofessional, manipulative news channel)

Seznam TV (Televize Seznam)

- Czech commercial TV station owned by Seznam company of Ivo Lukačovič. It started in January 2018 and is specialized on news.
- TV Seznam is part of Seznam company which started as the internet search engine Seznam (No.1 in the Czech Republic) and the web portal. It was founded in 1996 by Ivo Lukačovič. Today Seznam runs more than 15 different web services and associated brands. Seznam had more than 6 million real users per month at the end of 2014. Among the most popular services, according to NetMonitor, are its homepage seznam.cz, email.cz, search.seznam.cz and the company database firmy.cz.

RADIO MARKET

Public Radio

Czech Radio (Český rozhlas) - is the public radio broadcaster of the Czech Republic, operating since 1923. The service broadcasts throughout the Czech Republic nationally and locally. It has four national services (Radiožurnál, Dvojka, Vltava and Plus), regional services in all regions of the Czech Republic, digital services (Rádio Junior, Radio Wave, D-dur, Jazz) and internet streams (Rádio Junior, Rádio Retro).

Four National Services

- Radiožurnál (news and information) Dvojka (entertainment, talk and news)
- Vltava (culture, classics and arts)
- Plus (analysis, context information, no music)

Digital services

- Radio Wave (service for young generation)
- D-dur (classic music since the renaissance era till today) Jazz (jazz music only)
- · Junior (fairy-tales, kid songs, entertainment, education)

Internet Streams

- Junior
- Retro
- Radio Prague (international multilingual service Spanish, French, German, English, Russian and Czech)

Commercial radio stations

Czech Media Invest

(owned by Daniel Křetínský, throughout its daughter company Czech Radio Center)

- Evropa 2
- Frekvence 1 Radio
- Bonton Radio Z

Media Bohemia

(owned by Daniel Sedláček, No.1 among the regional commercial services)

Rádio Blaník Fajn radio Rock Radio

Londa (owned by the trust fund of Czech PM Andrej Babiš)

Radio Impuls

Radio United Broadcasting (owned by Ivan Zach - one of the owners of TV Prima)

- Country Radio Radio 1
- Radio Beat Radio Kiss Signál rádio



Publishere (print, internet)

Mafra (the media division of the Agrofert group, owned by the trust fund of Czech PM Andrej Babiš)

- The multimedia company MAFRA ranks among the strongest media company in the Czech Republic and its coverage includes all media types: print, online, TV and radio.
- With its printed media, MAFRA addresses on regular basis 3.4 million readers, 7.4 million users of its internet based projects.
- The most important group's projects are:

Dailies:

- Mladá fronta DNES (the largest serious national daily in the Czech Republic. Its readers are presented with current and news coverage, as well as relaxed reading in specialized supplements. Lidové noviny (a daily newspaper. Established in 1893, the oldest existing Czech daily, banned during the communist regime and renewed as samizdat in 1988. It is a national news daily covering political, economic, cultural and scientific affairs, mostly with conservative view.
- Metro (the Czech version of the free-sheet Metro)

Weeklies:

- TÉMA (offers interviews with celebrities, true stories full of emotions and views into the life of high society).
- 5plus2 (free, regional weekly newspaper published in all regions of the Czech Republic).

Internet web sites:

 iDNES.cz - the web site of Mladá fronta DNES daily lidovky.cz - the web site of Lidové noviny daily

Czech News Center - CNC (previously owned by Ringier - Axel Springer)

- CNC is one of the most powerful media organizations on the Czech market, reaching
 millions of readers and internet visitors. The sole owner of the company is Czech Media Invest a.s., which is indirectly owned by Czech Daniel Křetínský and Slovak Patrik
 Tkáč.
- The company publishes 4 daily newspapers (Blesk, Aha! and Sport), 45 printed magazines and supplements, 30 online magazines, web projects and applications and run the services of a virtual operator and printing works.

Dailies:

- Blesk (the most sold and also most read daily tabloid newspaper on the market) Aha!
 (the pure tabloid)
- Sport (the only daily paper in the Czech Republic which exclusively focuses on sport content) E15 (the economic daily)

Weeklies:

- Reflex (the most-sold weekly news magazine in the Czech Republic) Blesk pro ženy (the most sold women's magazine on the market)
- Blesk Hobby, Blesk Zdraví and Blesk Vaše recepty (leisure time magazines) etc.

Monthlies:

- · Lidé a Země (magazine for travellers) Maminka (magazine for mums)
- Moje psychologie (magazine about psychology) Dieta (magazine for those who want to stay fit)
- A. (magazine for food lovers with recipes) Svět motorů and AutoTip (the motoring segment) ForMen (the lifestyle monthly)
- Computer (the technically-focused magazine)
- ABC, Sluníčko and Mateřídouška (magazines for kids and young people) etc.

News Web Site I

- nfo.cz
- In November 2016, the news website INFO.CZ was launched, focusing on the most important events in politics, business and more besides. It brings new perspectives, analyses and commentaries with strongly right-wing view.

VLM - Vltava Labe Media

VLM is a Czech publishing house - the second biggest in the Czech Republic. It created unique network of over 70 regional dailies and dozen of weeklies. Since November 2015, it belongs to investment group Penta Investments which acquired it from the German regional publisher Verlagsgruppe Passau.

Dailies:

• Deník (local newspapers with strong national pages)

Magazines:

- Glanc (the fortnightly women's lifestyle magazine) Týdeník Květy (women's monthly)
- Vlasta (women's monthly)
- Kondice (the magazine about how to stay fit)
- TV Star, TV Magazín, TV Mini (TV listings and gossip magazines) etc.

Borgis

Borgis publishes the left-wing daily Právo and operates internet servers Novinky.cz, Super.cz a Sport.cz. The majority owner of Borgis company is Zdeněk Porybný - the Editor-in-Chief of Právo daily. In 2013, the internet and media company Seznam.cz acquired 33,5% stake in Borgis.

Daily:

 Právo (the Czech left-wing daily newspaper, Právo emerged in 1991 following the Velvet Revolution, when some editors of the daily Rudé právo founded a new company unaffiliated with the Czechoslovak Communist Party but taking advantage of the existing readers' base).

Internet web sites:

novinky.cz (news website) super.cz (gossip website) sport.cz (sport website)

Economia

Economia was founded in 1990 and is specialized on business publications. It is the publisher of Hospodářské noviny economic daily, Respekt and Ekonom weeklies, several news websites and also a number of B2B titles. From 1999, majority shareholder of Economia was the German Verlagsgruppe Handelsblatt (together with Dow-Jones group) until it was acquired by Czech investor Zdeněk Bakala in 2008.

Daily:

 Hospodářské noviny (first published on 21 May 1990. It is a business daily No.1 in the Czech Republic with a specific focus on economics and business)

Weeklies:

- Ekonom (No.1 business weekly in the Czech Republic)
- Respekt (a weekly opinion and news magazine, reporting on domestic and foreign political and economic issues, as well as on science and culture).



News websites:

- ihned.cz (news, business news) aktualne.cz (news)
- ekonom.cz (web site of the weekly) respekt.cz (web site of the weekly)

Burda International CZ

Burda Praha belongs to the Burda International publishing group and has been operating on the Czech market since 1991. It publishes over 40 periodicals, such as ELLE, Marianne, Apetit, Marianne Bydlení, Maxim, Marie Claire, InStyle, JOY, Svět ženy, Katka and others in the Czech Republic. The publishing house also produces annually more than 80 special editions,

Mladá fronta

The Mladá fronta publishing company was established in 1945. The company is now owned by František Savov - escaped Czech person who is wanted on the suspicion of tax evasion and money laundering going into the hundreds of millions of crowns and is on the brink of bankruptcy. (Mladá fronta is not the publisher of MF DNES daily).

Weekly:

Euro (business weekly)

Magazines:

 AUTO7, auto motor a sport and Motocykl (motoristic magazines) Puntík and Tečka (kids magazines)

Books:

 The publishing company also has a Books Division, which introduces around 200 new titles onto the market every year.

Empresa Media Group

Czech publishing house owned by Jaromír Soukup which has published a range of news and gossip magazines. Many of them has been recently discontinued (Instinkt) or are on hold now because of the economic problems (Týden weekly).

Our Media

 Company of manipulative web sites. Owned by the owner of big lottery company and former member of the Senate (2014 - 2020) Ivo Valenta. Company was established by former CEO of Ringier Czech Republic Michal Voráček.

Web sites

- Parlamentní listy website with the wide content of political news and opinions.
 Its content is mostly manipulative, often influenced by external influences. It offers payed-for room for political opinions and promotion.
- Krajské listy regional version of above mentioned website.

Independent Media Project

All of them has been launched after the Czech billionaire and now PM Andrej Babis has entered the politics and bought one of the largest publishing houses in the Czech Republic - Mafra. The owners of those independent projects are the respected senior journalists and personalities of

Czech media sector who don!t accept the "oligarchisation" of the media industry.

DVTV

• The first news internet TV in the Czech Republic. Has a long term cooperation with Economia publishing house. Recently succeeded in the large scale crowd funding.

Reportér

Independent monthly news magazine. Politics, society, culture. Established by former editor-in- chief of MF DNES daily.

Forum 24

- Established by former editor-in-chief of MF DNES and Lidové noviny daily.
- forum24.cz Independent internet opinion daily defending liberal democracy, daily news and opinions, large scale critic of PM Babiš and his government.
- Revue Forum monthly newsmagazine

Echo 24

- Established by former editor-in-chief of Lidové noviny daily.
- Echo 24 conservative internet news daily.
- Týdeník Echo weekly news and opinion magazine.

Hlídací pes

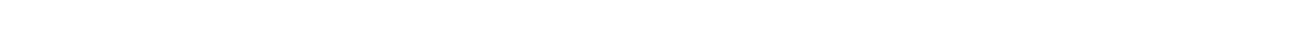
 hlidacipes.org - analytical and long-format journalism critical to the government of Andrej Babiš.

Neovlivní

- Established by former editor-in-chief of MF DNES daily.
- neovlivni.cz investigative journalism web site.
- Magazín neovlivní.cz monthly with investigative content.

investigace.cz

Investigative web site - part of the international network





Out-of-Home Advertising (OOH)

1

JCDecaux - Czech branch of the world biggest outdoor advertising group. Active in street furniture, public transport advertising and billboard advertising.

Big Board - biggest Czech outdoor advertising agency, active through the whole Czech Republic under brands: BigBoard, CzechOutdoor, Outdoor Akzent, News Advertising, Bilbo City, QEEP

HUNGARY MEDIA MARKET

s our previous Soft Censorship reports have shown year after year, the Hungarian media market has been subject to spectacular changes in the last decade. The ownership structure in the market has been changing continuously, and as a result several foreign investors have been pushed out of the market and the Hungarian media arena is increasingly dominated by politically affiliated domestic investors. A new development is that Fidesz, which has been the governing party in Hungary since 2010, no longer merely transforms the ownership structure of individual media corporations but has established a dominance of pro-government media throughout the entire media ecosystem.

It is widely known that state advertising has given rise to significant level of market distortion in Hungary, and this impact continues to persist. For the time being, we still do not know what kind of long-term changes will result from the pandemic once the latter has subsided; what is already apparent, however, is that in the case of several media brands the share of state advertising has grown, as has the dependence of these brands on the state. Independent media enterprises, by contrast, are increasingly compelled to turn to their audiences for revenue, often by generating income through crowdfunding.

1. OWNERSHIP STRUCTURE/CHANGES

The changes in the Hungarian media landscape have been at the forefront of international attention for years now. Substantial transformation has occurred in the ownership structure of Hungarian media, and as a result we have seen the emergence of a massive ownership concentration in the market, with the state using a variety of methods to distort the market. In the meanwhile, Hungary's position in the World Press Freedom Index compiled by Reporters Without Borders continues to deteriorate each year, and the debates in the European Union also frequently focus on the issue of media freedom in Hungary. Viktor Orbán's government is regularly the subject of international criticisms in connection with the poor state of public discourse in Hungary.

The transformation of the media ownership structure is being realised step-by-step, and the constellation that prevails today is the result of a protracted process. In the first half of the 2010s, several foreign investors left the Hungarian media market, and their stakes in the media market were generally acquired by pro-government investors who had a political outlook on their investment. During this period, Lajos Simicska, an old friend of the prime minister, was the oligarch-in-chief. As the businessman with the largest pro-government media empire, Simicska wielded exceptional influence. It was probably also on account of the latter that he became caught up in a conflict with the prime minister which devolved into open civil war over time. Once the prime minister had managed to marginalise Simicska, a new oligarch, Lőrinc Mészáros, moved to the fore in the second half of the 2010s. Mészáros had previously worked as a gas-fitter but within the span of a mere few years, he has emerged as the largest media owner in Hungary.

Another emblematic day in the transformation of the Hungarian media landscape was the day when the Central and Eastern European Media Foundation (abbreviated as KES-MA in Hungarian) was established in 2018. On 28 November almost all Fidesz-friendly media owners transferred the ownership rights of their media holdings to KESMA. Their companies joined the foundation, all of them without any type of compensation for the owners. The foundation itself had been created in August 2018 by a stock corporation that is owned exclusively by Gábor Liszkay, the famous media figure loyal to Viktor Orbán. The foundation's board was made up of Fidesz MPs, as well as the CEO of a Fidesz-friendly think-tank. Its mission is to "promote activities that serve value creation and strengthen Hungarian national identity in the print, radio television and online media platforms that make up Hungarian mass communication." Altogether 476 media brands joined to KES-MA, and it has significantly increased the media ownership concentration is Hungary.

There have been no substantial new developments in the KESMA empire since, although some technical changes did take place. Back in 2019 Mediaworks was awarded so-called controlling rights over 29 KESMA-owned corporations,¹ and hence since that year the consolidated financial report of Mediaworks provides an overview of the financial performance of the entire corporate group.

One stunning development in 2020 was that the previous top figure of the pro-government media empire, Gábor Liszkay, turned over his rights as the founder of KESMA to an attorney, Tamás József Kertész. Kertész was previously unknown in the media world, although he did work as an attorney for Lőrinc Mészáros, the prime minister's close friend.²

The most significant event in the Hungarian media market in 2020 was the change in the ownership of Hungary's leading online news site, Index. The backstory is very complex, but at the same time it is also highly an illustrative a process, as pro-government forces gradually suffocated the prominent independent news site and the took full control once the existing team had resigned in protest.

The first signs of trouble at Index date back to 2011. Back then, the editor-in-chief resigned and several emblematic figures in the management also left the news site. They did not divulge the reason behind their departure, but it was obvious that political pressure had played a role. The next turning point was in 2017, which saw a change in Index's ownership structure. The publishing rights were taken over by the Foundation for Hungarian Development (Magyar Fejlődésért Alapítvány), and the foundation's board consisted of a single official, László Bodolai, who had worked as the newsroom's attorney up to that point. Bodolai's status appeared to be a sign of independence since the newsroom trusted him, but the trap that would eventually snap shut was already in place: the publisher was only responsible for the journalism-related aspects of the media organisation while the other areas that were vital in terms of corporate operations, such as finance, HR, IT, etc., were entrusted to a larger holding. What proved to be especially crucial was that advertising sales were managed by one of the companies in the holding, Indamedia (previously it was called CEMP), which meant that advertising revenue did not flow directly to the publisher. This unusual constellation prevailed right up to the summer of 2020.

In hindsight, it is difficult to tell whether the governing party had already planned from the start to liquidate Index's independence in the summer of 2020 or whether they merely seized the opening provided by the financial problems wrought by the corona pandemic. What is certain regardless is that the critical news site and its vast audience reach had been a thorn in the governing party's side for a long time now, and Viktor Orbán once referred to Index as a fake news factory.³ At the same time, it also seemed likely that they would try to avoid an intervention that was openly politically motivated: Index was too prominent and popular a target and hence a very heavy-handed and open takeover could trigger a backlash.

In any case, the pace of events accelerated rapidly in the spring of 2020. By that time, Index had become operationally completely dependent on the Indamedia holding. In March, Miklós Vaszily, the most prominent business manager of the pro-government media world, took over as the owner of Indamedia. The financial difficulties at Index propelled events further still, and the conflict between Indamedia and the newsroom was soon laid bare. Once the owner – under pressure from Indamedia – fired editor-in-chief Szabolcs Dull, the entire newsroom quit, thereby ending Index's story as an independent newspaper.

In the following months the departed newsroom drew on crowdfunding to launch its own news site called Telex. Although Index has lost a slice of its readership, it remains a major player in the online news market. Index saw an ongoing series of personnel changes in the fall of 2020, and for the time being it is difficult to discern what editorial line the online newspaper will follow in the long-run. But the brand name is so powerful that a large segment of the previous audience continues to use Index. Since the collapse of Index as an independent news source, 24.hu has emerged as the leading online news site.

¹ Kovács, G. (2019): Vége, a fideszes média hivatalosan is birodalommá alakult [The end, the Fidesz media has officially become an empire] https://hvg.hu/kkv/20190529 Vege a fideszes media hivatalosan is birodalomma alakult

² Sarkadi Nagy, M. (2020): Kertész József Tamás vette át Liszkay Gábortól az orbánista médiholdingot alapító céget [József Tamás Kertész took over the company that founded the Orbánist media holding from Gábor Liszkay] https://blog.atlatszo.hu/2020/12/kertesz-jozsef-tamas-vette-at-liszkay-gabortol-az-orbanista-mediaholdingot-alapito-ceget/

³ Plankó, G. (2018): Orbán: "Az Index egy fakenews-gyár" ['Index is a fakenews factory'] https://444.hu/2018/05/27/orban-az-index-egy-fakenews-gyar

At this time, media brands in Hungary fall into one of three categories.

- Among the media outlets that are obviously aligned with the government, an overwhelming majority are owned by Central European Press and Media Foundations, although there are a few that have not joined KESMA.
- 2. In the case of media that were classified as unequivocally independent, there was neither any known link between the owners and the governing party nor a significant dependence on revenues from government advertising.
- 3. There are media outlets which fall into what we called the grey zone: although the owners do not openly acknowledge their ties to the governing party, investigative reports have revealed that such a link does exist or, alternatively, the share of state advertising in their total revenue is significant.

Categorisation of the major media brands

Pro-government

- 18 county newspapers (KESMA)
- Retro Radio, Karc FM (KESMA)
- origo, 888 (KESMA)
- Magyar Nemzet (KESMA)
- Hír TV (KESMA)
- TV2
- Index
- etc

'Grey Zone'

- ATV
- Népszava
- Info Rádió
- etc.

Independent

- RTL Klub
- · HVG, hvg.hu
- 24.hu
- 444.hu
- Telex
- etc.

The position of many media outlets in this classification scheme has been stable for a while now. At the same time, in some cases the changes in ownership or other issues going on in the background have resulted in some media brands shifting into a different category. In recent years it was clearly the category of independent media that has narrowed, with numerous media brands moving into either the pro-government or grey zone categories.

There are of course also media enterprises that are only active in the market for entertainment contents, and they have a very limited impact on public life (e.g. the Viacom group or the Ringier-Axel Springer portfolio in the market for glossy magazines).

2. MARKET CONDITIONS AND LAWS

The adoption of the media laws in 2010 not only laid the foundation for the complete overhaul of the Hungarian media system but at once represented one of the Orban-government's first measures to scale back constitutional democracy.

Two important acts were voted by the Parliament in 2010.:

- Act CIV of 2010 on Freedom of the Press and on the Basic Rules Relating to Media Content (Smtv.). It includes all fundamental regulations on media content and provisions for the legal status of journalists.
- Act CLXXXV of 2010 on Media Services and on the Mass Media (Mttv.). It fundamentally includes the regulation on the formation of the media system's structure.

These media laws fail to instate adequate safeguards for a pluralistic and autonomous oversight of either commercial or public service media. There are some major problem areas in the Hungarian media regulation.

The Media Council has been a politically homogeneous media authority since 2010. It restructured the radio market by the frequency tenders, vast majority of independent radio stations disappeared from the market in the last few years. The Media Council allowed all acquisitions and mergers involving pro-government players, while it stopped the media mergers when independent market players were involved. Moreover, Media Council president and members are appointed for a nine-year term, and it is highly problematic. The current Media Council members are in their positions until 2028.

The media laws insufficient cross-ownership rules resulted in a distorted and imbalanced media market and the results are already visible: market has become more concentrated, plenty of independent local stations disappeared and the previously flourishing segment of community radios has also been losing out. Creation of KESMA led to unprecedentedly high ownership concentration.

Funding of the Hungarian public service does not comply with the European regulations on state aid. All of the public media's content acquisition and show production is performed by the MTVA (Media Service Support and Asset Management Fund). At the same time, the editorial responsibility for the content lies with another organisation, the Duna Médiaszolgáltató Nonprofit Zrt (Duna Media Service Provider Non-Profit Corporation). It is the de jure public service media provider. The MTVA disposes of all these taxpayer funds without being subject to any meaningful outside control and no one has a clue of where and how it spends the money. On the one hand it means corruption risk, on the other hand the lack of control in financing of public service media led to market distortion.

An amendment of the Criminal Code in spring 2020 affected the journalistic work. According to the amendment, not only false statements which may disturb public order are considered criminal offences but also those capable of hindering or thwarting the effectiveness of the protection (e.g. against the virus). It also strengthens penal sanctions as the offence is now punishable by imprisonment for up to five years instead of three. The amendment can be used only in a special legal order, e.g. during pandemic. Researches of Hungarian Civil Liberties Union⁴ found that the amendment affected journalists and more intensive legal work than ever before is needed in newsrooms.

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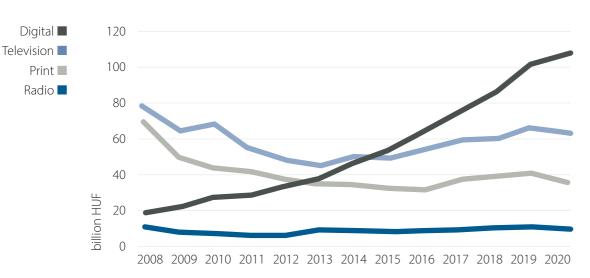
⁴ Hungarian Civil Liberties Union: Research on the obstruction of the work of journalists during the coronavirus pandemic in Hungary, 15 April 2020, https://tasz.hu/a/files/coronavirus_press_research.pdf and Kutatás a sajtó működésének állami akadályoztatásáról [Research on state obstruction of the press], 12 May 2021, https://tasz.hu/a/files/tasz_sajtokutatas_3.pdf

3. ADVERTISING TRENDS

Similarly to other countries, in Hungary, too, the dominant trend in the advertising market has been the growth of the digital segment. This is a problem especially because a significant portion of the advertising revenue arriving in the digital segment does not end up with content providers but with the major global digital platforms. According to a joint survey by IAB Hungary and PWC, 59% of the digital advertising revenues ended up with global corporations (e.g. Google, Facebook) while only 41% were paid to local providers, in other words to Hungarian companies.⁵

Adverting revenues in the main media sectors in Hungary (billion HUF)

Adverting revenues in the main media sectors (billion HUF)



Source: MRSZ [Magyar Reklámszövetség, Hungarian Advertising Association]

Because of the impact of the pandemic, advertising revenues dropped in 2020, but that does not imply that the advertising market has collapsed. The so-called media pie – that is the total revenue in the various media segments – has dropped by 2.8% in 2020. As the figure shows, revenues have even increased in the digital market, while incomes in the print newspaper, television and radio segments have declined. The long-term impact of the pandemic is not fully apparent yet, of course, much depends on whether the vaccinations will help fully stop the spread of the coronavirus, how rapid the economic recovery will be and how consumption patterns will change after the pandemic.

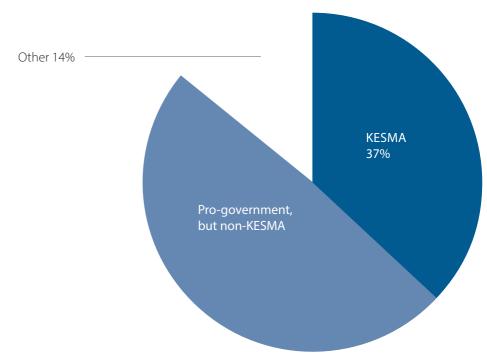
4. STATE ADVERTISING

State advertising spending has been a longstanding problem in the Hungarian media market. Even before Fidesz took power, that is prior to 2010, there were signs that the reigning governments were favouring media loyal to them when rendering their decisions about state advertising; in the 2010s, however, the political motivation behind the distribution of state advertising became unequivocal in its openness.⁶ What's more, the amount of money spent by the state on advertising has been growing each year, with the result that these days the distorting impact of state advertising in the media market has emerged as a significant factor.⁷

State advertising data can be analyzed based on Kantar Media database, which contains so-called list price advertising revenues. This calculates advertising revenues of major media brands based on publicly available lists prices and actual advertising volumes published. The database does not extend to every media outlet, important political/news brands are missing (e.g. Hír TV or ATV).

In 2020 value of all state advertising spending was 128.3 billion HUF (ca 365 million EUR) at list prices, but in reality this figure was far lower because it does not account for the discounts. What is striking is how these amounts were distributed between the various market players.

Share of state advertising spending (2020)



Source: own figure based on data from Kantar Media

The catalogue of KESMA-controlled companies is easy to compile since the official corporate registry records establish clearly which companies are owned by KESMA.

⁵ IAB Hungary – PWC (2021): Digitális reklámköltési adatok [Digital advertising spending data] https://iab.hu/wp-content/uploads/2021/04/IAB_HU_Adex_2020.pdf

⁶ Detailed figures are available here: https://mertek.atlatszo.hu/allamihirdetesek/

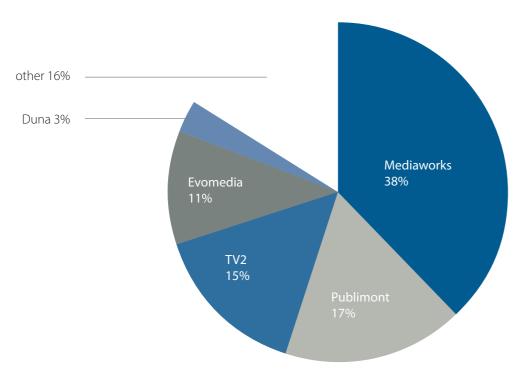
⁷ Attila Bátorfy & Ágnes Urbán (2020) State advertising as an instrument of transformation of the media market in Hungary, East European Politics, 36:1, 44-65, DOI: 10.1080/21599165.2019.1662398

We classified those companies which are not owned by KESMA but whose owners are nevertheless unequivocally connected to the government party as falling into the category of 'pro-government but owned by KESMA'. The companies in this category are those whose ownership links have been clearly investigated by journalists and/or whose owners themselves acknowledge their Fidesz affiliation.

All the remaining media corporations apart from the above were assigned to the 'other' category, even if the editorial line and practice clearly reflected that the media outlet is leaning towards the government. Thus, our classification scheme was very cautious, and we only assigned those media outlets to the pro-government category where we had unequivocal evidence tying the given media outlet to the government's sphere of interest.

It is worth taking a separate look at the spending by the largest state advertisers, the Prime Minister's Cabinet Office. At list prices, it advertised for a total of 56 billion HUF (ca. 159 million EUR), which makes up 43.6% of all state advertising spending. The advertising spending of the Prime Minister's Cabinet Office is large enough to massively influence the entire state advertising portfolio.

Advertising spending of the Prime Minister's Cabinet Office (2020)

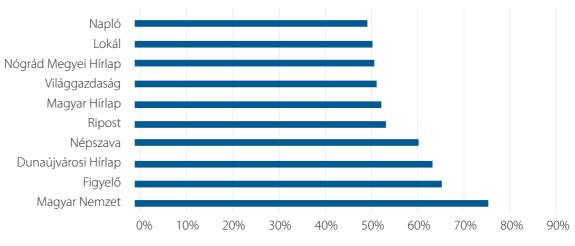


Source: own figure based on data from Kantar Media

Mediaworks and Evomedia are owned by KESMA, there overall share is 49 percent. Publimont and TV2 are clearly close to the government, their overall share is 32 percent. Duna is the public service media, and clearly part of the pro-government media empire. The "Other" category includes all other media companies, regardless of ownership structure and political orientation (so not only independent media companies, but also smaller pro-government companies are included).

Already back in 2019 the ratio of media that were predominantly dependent on the state for their advertising income was exceedingly high. In many cases, the share of state advertising revenue in total advertising revenue exceeded 50 percent.

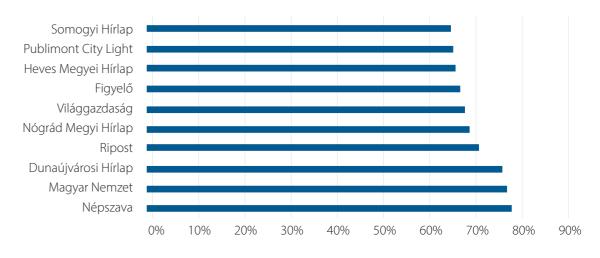
Some important media brands with high share of state advertising revenue in total ad revenues (2019)



Source: own figure based on data from Kantar Media

These data increased in 2020, which stemmed in part from the fact that during the pandemic commercial advertisers spent even less than usual on advertising, and hence the share of state advertising increased in several cases.

Some important media brands with high share of state advertising revenue in total ad revenues (2020)



Source: own figure based on data from Kantar Media

The two lists above are very similar in two respects. First, the dominance of Mediaworks is unequivocal, the media products owned by the publishing company feature several times on each of the two lists. This also implies that with respect to print publications, the share of state revenues is exceedingly high, which means that this is the segment of the media that is most exposed to state influence.

5. FINANCIAL PERFORMANCE OF MEDIA COMPANIES

An important indicator is how the media corporations' net revenue from sales have shaped up recently.

The table below features the data for the most important pro-government media brands. Primarily as a result of the establishment of the KESMA, the corporate structure of the market has been subject to a massive transformation, which makes it impossible to properly compare the revenues between 2017 and 2019. As was previously pointed out, the so-called controlling rights of the KESMA corporation were transferred to Mediaworks, and hence the data for 2019 reflects the consolidated figures for Mediaworks.

The fact is that the pro-government media are amply funded, and the substantial chunk of revenue they receive from state advertising plays a major role in this.

Most important pro-government media brands

Duran d	T	Deskillahan	Net sales re	venue (in '000 H	UF) <i>in EUR</i> ⁸
Brand	Type	Publisher	2017	2018	2019
Mediaworks portfolio	print/online + TV, radio (KESMA)	Mediaworks Zrt	20 406 205 (58 095 957€)	27 715 172 (78 904 404€)	
Bors (+ Lapcom portfolio)	print/online	Lapcom Zrt	10 477 747 (29 829 885€)	10 155 018 (28 911 083€)	
Ripost	print/online	Ripost Kft	3 042 759 (8 662 659€)	2 536 049 (7 220 068€)	
Figyelő	print	K4A Lapkiadó	835 674 (2 379 143€)	971 896 (2 766 964€)	
Szabad Föld	print	Mezőgazda Lap és Könyvkiadó Kft	1 462 233 (4 162 941€)	1 476 411 (4 203 305€)	70 840 982 (201 682 511€)
Mandiner	print/online	Mandiner Press Kft	70 499 (200 709€)	111 759 (318 175€)	(consolidated)
Retro Radio	radio	Hold Reklám Kft	49 109 (139 812€)	424 118 (1 207 453€)	
Karc FM	radio	KARC FM Média Kft	284 126 (808 900€)	360 676 (1 026 836€)	
HírTV	televison/ online	Hír TV Zrt	2 356 617 (6 709 230€)	2 316 436 (6 594 836€)	
Origo	online	New Wave Media Group	5 642 542 (16 064 177€)	4 145 674 (11 802 631€)	
888.hu	online	Modern Média Group Zrt	3 179 663 (9 052 421€)	2 683 912 (7 641 031€)	
TV2	television/ online	TV2 Média Csoport Zrt.	34 506 529 (98 239 228€)	39 101 320 (111 320 484€)	41 150 047 (117 153 159€)
Magyar Hírlap	print/online	Magyar Hírlap Kiadói Kft.	740 730 (2 108 840€)	770 247 (2 192 874€)	768 499 (2 187 898€)
Demokrata	print	Artamondo Kft.	551 890 (1 571 217€)	465 800 (1 326 121€)	496 526 (1 413 597€)

Source: Annual financial accounts (https://e-beszamolo.im.gov.hu/oldal/kezdolap)

The independent media corporations in the news and public affairs market have generated far lower levels of revenue; the only major company among them is the Magyar RTL Televízió Corporation, which operates the television channel RTL Klub. Although the main objective of that commercial channel is entertainment, its political news shows nevertheless play a major role in the political information of the public.

Most important independent media brands

	_	5.15.1	Net sales re	evenue (in '000 H	IUF) <i>in EUR</i>
Brand	Туре	Publisher	2017	2018	2019
HVG	print/online	HVG Kiadó Zrt.	3 650 887 (10 393 984€)	3 714 775 (10 575 872€)	3 931 552 (11 193 031€)
Magyar Narancs	print/online	Magyarnarancs.hu Lapkiadó Kft.	238 145 (677 993€)	233 745 (665 466€)	243 037 (691 920€)
Élet és Irodalom	print/online	Irodalom Kft.	199 477 (567 906€)	199 724 <i>(568 609€)</i>	235 144 (669 449€)
Magyar Hang	print/online	Alhambra Press Bt.	-	70 652 (201 144€)	193 519 (550 944€)
Blikk	print/online	Blikk Kft	5 958 230 (16 962 932€)	5 983 730 (17 035 530€)	5 943 138 (16 919 966€)
Klubrádió	radio/online	Klubrádió Zrt.	74 626 (212 458€)	74 192 (211 223€)	52 746 (150 167€)
RTL Klub	television/ online	Magyar RTL Televízió Zrt.	34 257 102 (97 529 116€)	32 768 373 (93 290 742€)	39 986 729 (113 841 221€)
24.hu	online	Central Digitális Média Kft.	3 882 029 (11 052 040€)	4 072 866 (11 595 348€)	4 145 654 (11 802 574€)
444.hu	online	Magyar Jeti Zrt	510 505 (1 453 395€)	510 365 (1 452 996€)	542 478 (1 544 421€)
G7.hu	online	G-7.hu Nonprofit Zrt	2 047 (5 828€)	13 036 <i>(37 113€)</i>	52 996 (150 878€)
Válasz Online	online	Válasz Online Kiadó Kft.	-	280 <i>(797€)</i>	170 (484€)
Átlátszó	online	Atlatszo.hu Közhasznú Nonprofit Kft.	1 841 <i>(5 241€)</i>	6 762 (19 251€)	3 771 (10 736€)
Direkt36	online	Direkt36 Nonprofit Kft.	6 628 (18 870€)	4 223 (12 023€)	2 200 (6 263€)
Index*	online	Index.hu Zrt	1 429 804 (4 070 616€)	1 303 864 (3 712 068€)	1 244 682 (3 543 579€)

Source: Annual financial accounts (http://e-beszamolo.im.gov.hu/oldal/kezdolap)

Most of the media brands that are relevant in terms of their impact on public discourse do not generate income from advertising alone but also rely on crowdfunding (such income is not captured by the net revenue from sales statistic). A prominent case is that of Klubrádió, which has mostly depended on the donations of listeners since advertisers have begun to avoid the critical station out of caution. Online newspapers, too, are compelled to ask their readers for donations (thus, for example, 444.hu and G7 do this, and so did hvg.hu before it introduced a paywall). There are also sites (Átlátszó, Direkt36, Válasz Online) that do not even anticipate any revenue from advertising and base their operations entirely on donations.

⁸ For conversion we have used the 2020 currency exchange average rate, of 351.25 HUF for 1 EUR https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=ert_bil_eur_a&lang=en

^{*} Index was an independent news portal at the time, with a mass resignation in 2020

Most important media brands in the 'grey-zone'

Brand	Turno	Publisher	Net sales revenue (in '000 HUF) in EUR			
Dranu	Type	Publisher	2017	2018	2019	
Népszava	print/online	XXI. század Média Kft.	1 668 716 (4 750 793€)	1 842 166 (5 244 601€)	1 960 981 (5 582 864€)	
ATV	television/ online	ATV Zrt.	2 374 545 (6 760 270€)	2 396 674 (6 823 271€)	2 659 733 (7 572 194€)	
Hetek	print	Hetek.hu Kft.	132 632 (377 600€)	151 050 (430 036€)	144 437 (411 209€)	
168 óra	print/online	Telegráf Kiadó Kft.	291 438 (829 717€)	173 987 (495 337€)	225 286 (641 384€)	
Inforadio/ Infostart	radio/online	Inforádió Kft.	394 155 (1 122 149€)	549 612 (1 564 732€)	616 992 (1 756 561€)	

Source: Annual financial accounts (http://e-beszamolo.im.gov.hu/oldal/kezdolap)

There are media brands that cannot be assigned to the category of propaganda-style pro-government media but at the same time do not qualify as independent outlets, either. Typically, a significant portion of their revenues depend on the state, either because the share of state advertising in their total advertising revenue is fairly high or because the owner has demonstrably strong ties to the government.

6. INFLUENCE OF ONLINE AND SOCIAL MEDIA

According to a fall 2020 study, online media have emerged as a major source of news. Their reach as news sources is now on par with television, which used to predominate. As compared to online sources and television, the role of all other types of media in news consumption is substantially less significant. Social media, too, have become more prominent in individual media consumption; in 2020, 56% of users encountered political/public affairs contents on Facebook, which is more than twice the relevant value in 2018. The pandemic was probably a major factor in the increased role of online news sources and social media; users evinced a greater appetite for news than ever before as they sought to stay abreast of the most recent developments. A new public affairs YouTube channel, Partizan, also became widely known when it switched to daily programming at the start of the pandemic in 2020.

Like in other countries, fake news and disinformation were also frequently spread in Hungary, and the problem is not limited to social media. An often-mentioned feature of the Hungarian media system is that there is no need for organised Russian disinformation here, and Russia Today and Sputnik have no presence in Hungary. In Hungary, the pro-government media perform the functions that Russian media corporations perform elsewhere, that is they spread narratives that are favourable for the Kremlin. This is not limited to Russian-friendly messages but also includes efforts at portraying the European Union as weak and unviable, and undermining trust in the EU institutions in general.

Not all propaganda sites disseminate pro-government narratives, of course – similar sites exist on the opposition side, too. Nyugati Fény (an online newspaper affiliated with the Democratic Coalition) and Ez a lényeg are primarily active on Facebook, a large portion of their articles are published without a by-line and pieces discrediting governing party politicians are typical of their oeuvre. They are far more focused on incitement than journalism classically understood.

In Hungary, the online space is not exclusively a terrain for propaganda and fake news – quality contents are also more likely to be found online than in legacy media. There are several explanations for the prominent role of online media in the dissemination of quality contents. These include the relatively low costs of publishing online and the fact that doing so does not require a decision on the part of the media authority, unlike the use of a radio frequency, for example. Recent trends in the market for print newspapers also illustrate why independent/non-government media find it easier to operate online and why, as a result of the latter, pro-government players are less likely to dominate the entire online ecosystem.

It is hence no coincidence that the international players who have recognised that they need to step up in the Hungarian media market in order to defend diversity (Radio Free Europe, Deutsche Welle) only provide online services in Hungary. The presence of these highly prestigious media outlets is of course useful, but at the same time one must also note that they only reach those media users who are already very deliberate in their media use and tend to consume the most reliable and independent online news sources. The least conscious and most vulnerable – in terms of their access to quality information – users, by contrast, those who do not use the internet or are incapable of deliberately seeking out quality sources, typically encounter pro-government propaganda.

As we approach the 2022 parliamentary elections, we observe increased levels of political activity in social media. One example worth highlighting is the launching of the Megafon project in 2020, which set out with the goal of amplifying the reach of the allegedly suppressed pro-government voices. This project only became really active in 2021, and they spend large amounts of money each week on advertising the posts of pro-government opinion leaders on Facebook. As a result, the pro-government narrative on politics reaches large segments of the public, while in the process the personal brands of these political influencers is continuously boosted, too.

7. THE ROLE OF THE BROADER ECOSYSTEM IN THE MEDIA

In recent years it has become apparent that Fidesz's attempts at shaping the structure of the public sphere are not limited to its influence over media corporations. Figures with ties to the government began cropping up in every segment of the media ecosystem. The media ecosystem includes such related markets and services as advertising, as well as printing and distribution in the case of print newspapers.

The most recent changes affect the market for newspaper distribution. The state-owned Hungarian Postal Services have announced that as of 30 June 2021 they will no longer distribute daily newspapers. It is difficult to ascertain whether and in how far that decision was motivated by business considerations or whether it was more influenced by politics, although it is in fact true that these days the circulation figures of daily newspapers are very low, which makes it likely that their delivery to households generates a loss for the Postal Services. Mediaworks, which publishes a network of regional/county daily newspapers that spans the entire country, has its own distribution system, which is part of the KESMA today. Hence, the print newspapers in the KESMA portfolio are unaffected by the changes in the Postal Services' newspaper distribution policy. The biggest loser of the Postal Services' decision to end the delivery of daily newspapers is Népszava, the single remaining daily that is critical of the government.

The political weekly Magyar Hang was launched in 2018 by former staffers of Magyar Nemzet (that daily was initially shut down after it was taken over by pro-government investors and was then relaunched with pro-Fidesz staff). When Magyar Hang began its

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work, the staff faced a peculiar difficulty in that they could not find a single printer in Hungary that proved willing to print their newspaper, which is why the publisher ultimately had to sign a deal with a Slovakian printer. When the coronavirus pandemic began, the publisher once again tried to find a printer in Hungary due to the difficulties of cross border delivery, but wherever it turned its requests for price quotes were denied, and as a result Magyar Hang continues to be printed in Slovakia. It is difficult to explain why printers evince no interest in printing a newly published newspaper in a market that is otherwise in decline, which raises the distinct possibility that no one wants to or no one dares to enter into a deal with a newspaper that is known for its critical reporting about the government – especially since government politicians and Fidesz-aligned media figures have made clear that they have special a wrath for journalists who were once in their own camp (this was true of Magyar Nemzet before it was shut down) and then switched sides, which is considered treason and has made Magyar Hang a special target of ire on the government side.

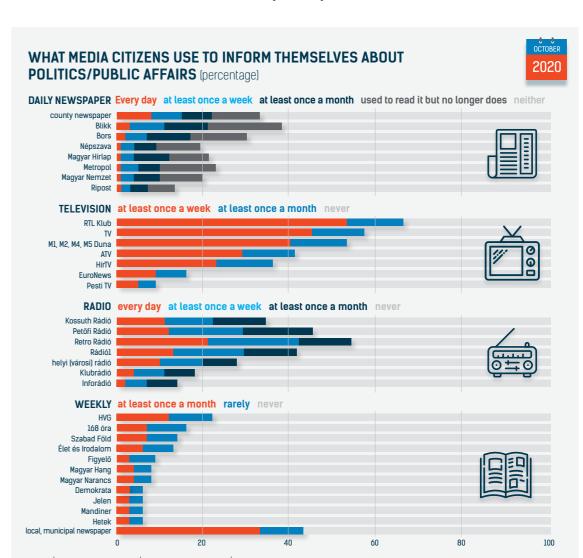
In the past years the media agencies have been key players in the media ecosystem. This owes to the way the advertising market operates. Advertisers commission media agencies to come up with a media plan for them and to then to implement that plan. Advertisers naturally approve the proposed media plan first, and of course they also track implementation of the campaign, which the agencies conduct in coordination with them.

This is no different in the case of state advertising. The so-called National Communications Agency operates as a division within the Prime Minister's Cabinet Office. This Agency is responsible for all state advertising spending, and it discharges this responsibility by issuing public procurement tenders in which it selects the media agencies that implement the designated advertising campaigns. The winning media agencies are traditionally companies with close ties to the government; since mid-2018, the winners have been companies owned by Gyula Balásy. It is not clear why his companies have been selected to allocate the state's advertising spending in the last three years. Previously, Balásy was a background figure working in the pro-government network of private enterprises and organisations, but then all of a sudden the previous agencies that had managed the state campaigns were squeezed out of the market and Balásy's companies moved to the fore as the government's new favourites.

The significance of the control over the market for state advertising is apparent in that fact that back in 2017 Balásy's largest company, the New Land Media Ltd, had a turnover of only 25.8 billion forints (ca. 73 million euros), which then surged spectacularly, to 70.3 billion forints (ca. 200 million forints) in 2019, a huge increase in the span of just two years. Needless to say, the general trend of the advertising market in Hungary did not show any signs of the dynamic that New Land Media experienced during that time. What made the difference in the company's own situation was that this was the time when it established itself as the chief player in the market for state advertising.¹⁰

ANNEX 1 - NEWS SOURCES (2020)

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⁹ Bányai-Ferenczi, R. (2020): Elutasították a Magyar Hang ajánlatkérését, amikor a koronavírus miatt magyarországi nyomdát próbált találni, ezért amíg még lehet, továbbra is Szlovákiában nyomtatják a magyar hetilapot. [Magyar Hang's requests for offers were rejected when it was looking for a printer in Hungary during the coronavirus pandemic, which is why they will continue to print the weekly in Slovakia as long as it remains possible] https://media1.hu/2020/03/20/elutasitottak-a-magyar-hang-ajanlatkere-set-amikor-a-koronavirus-miatt-magyarorszagi-nyomdat-probalt-talalni-ezert-amig-meg-lehet-tovab-bra-is-szlovakiaban-nyomtatjak-a-magyar-hetilapot/">https://media1.hu/2020/03/20/elutasitottak-a-magyar-hetilapot/

¹⁰ Czinkóczi, S. (2018): Rogánék váratlanul kirúgták a kormány két kedvenc PR-osát [Rogán's ministry unexpectedly fired the two favourite PR figures of the government] https://444.hu/2018/06/21/roganek-varatlanul-kirugtak-a-kormany-ket-kedvenc-pr-osat

ROMANIA MEDIA MARKET

he Romanian media landscape is diverse and dynamic, yet with gross disparities between the top 3 media players that concentrate most of the advertising revenues and benefit from the highest shares of the market, and the rest of the media entities. Being part of the global market, the Romanian media market is facing the same challenges that Internet and social media platforms raised to mainstream media in the last decade.

Despite the positive market developments that were recorded, an identity and respectability crisis increased significantly within the news media in the last three years. This is the consequence of the partisanship and polarization that manifested both within the political parties and in the newsrooms, with little respect to the general public. This critic has been constantly raised by RSF or other international bodies and it preserved the "problematic situation" within the Freedom of Expression Global Index.

Although there are no indications of state censorship or systemic abuses against media, there are numerous controversies and corruption cases that involve politicians and news media owners that complicitly distort the public agenda and contribute to polarization within the Romanian society.

1. OWNERSHIP STRUCTURE/CHANGES

In the last three years the most dominant media outlets went through various ownership and administrative changes, but with limited effects on their performance and profitability.

Established in 1995, the most powerful media brand, **Pro TV SRL** is owned by Central European Media Enterprises (since 2009) generated high rumors in 2019 when PFF Investments Group (owned by the Czech businessman, Petr Kellner, now deceased) bought CME Ltd for 2.1 billion dollars. Most worries were related to Kellner's controversial public profile, including presumptive connections to China, but also to the underestimation of Pro TV's market value. Eventually, in January 2020, Pro TV SRL announced an indirect change of shareholding, as the majority shareholder was not changed. Currently, Pro TV SRL is owned by CME Media Enterprises B.V. (99, 999996%) and CME Investments B.V. (0,000004%)¹. Historically, Pro TV was part of Media Pro Group a large cross media group that was established in 1991 and dominated the market for many years. In 2009, CME owned 95% of Media Pro Group televisions.

The second media brand in Romania, Intact Media Group, is a multimedia platform that consist of 5 national TV stations, two national radio stations, one national newspaper, along with various online media and other capacities (including an NGO)². Currently, the group that promote itself as a "family business" is organized under two distinct divisions: Antena Group SA and Antena 3 SA. Dan Voiculescu (founder of Intact Media Group) is one of the most controversial politicians and businessmen in Romania. He was sentenced in 2014 to 10 years imprisonment for the fraudulent privatization of a key research institute in Romania. Prior to his conviction, Dan Voiculescu has been politically active, leading a small party, and keeping in close relationships with the Social Democratic Party. Although Dan Voiculescu has transferred his shares to his daughters since 2005, his political agenda has interfered constantly with the editorial agenda of Antena 3, a news channel that was in Intact Media Group portfolio. Thus, over the years, Antena 3 became the most important and vicious promotional platform for Voiculescu's political allies, especially for the Social Democratic Party, including in 2017, when the social democrats openly set on an illiberal trend that provoked massive protests across Romania. Despite all the controversies, the entire media group is one of the most popular and profitable brands in Romania. Currently, the shareholding of the two entities is dominated by Voiculescu's daughters. Antena Group SA: Camelia Voiculescu (44%), Corina Mirela Voiculescu (40,2%), Grivco SA (another company owned by Dan Voiculescu, 7,9%), Dan Voiculescu Foundation (3,9%), Mihai Sabina (2%), Sorin Alexandrescu (former general director of Antena Group, sentenced in 2017 to 4 years imprisonment for blackmail, using media institutions in the group, and released on parole two years later, with 1% share) and Intact Media Advisors SRL (0,46%)³. Since 2016, Antena 3 SA made no changes within its ownership: Corina Voiculescu (49,58%), Camelia Voiculescu (43,85%), and Dan Voiculescu Foundation (6,57%)4.

Kanal D (established in 2007) is a commercial TV station that is competing directly the commercial segment and productions of Pro TV and Antena Group. The TV station was owned by Dogan Media International (operating in Turkey) until 2018, when the new majority shareholder became Dogan Media Invest (operating in the Netherlands), with 99,99998% shares and Rukiye Sevda Boduroglu, with 0,00002%. The Romanian administrator stated at that time that the change was mostly administrative and for legal purposes.

According to Media Fact Book (edition 2020) the three media groups sold in 2019 63% of the 2,11 million GRP30" (CME – 30%, Intact – 22% and Dogan – 11%).

News channels

Competition with the generalist and commercial TV stations has always been uneven, in the last two decades news channels have been pivotal in designing the political and the media agenda. Unfortunately, most of the existing channels have contributed to the escalation of the political discourse and polarization, as the owners were using the newsrooms as war rooms, especially in tormented political contexts.

Average national monthly ratings/share 2020 (news channels)

TV Channel	Rating (000)	Rating (%)	Share (%)
Romania TV	283	1,61	7,47
Antena 3	198	1,12	5,18
Digi 24	85	0,48	2,22
B1 TV	61	0,34	1,6
Realitatea Plus	54	0,3	1,43

Source: arma.org.ro (Kantar Media Romania)

The news niche is dominated by two players Antena 3 (part of Intact Media Group, previously described) and Romania TV.

Romania TV (2011) was founded by Sebastian Ghita, a controversial businessman and politician that is currently established in Serbia where he ran away in 2017 in order to avoid criminal investigations in Romania. Although, in the last three years, he has been acquitted for some of the charges, his name is still present in other current corruption cases. Formally, Ghita has transferred the ownership of Romania TV since 2012 when he entered the Romanian Parliament as a deputy of the Social Democratic Party. Yet the perception that he is actually controlling the news station even from Serbia is very persistent. For years, the official records showed that the majority shareholder was a close friend of Ghita, Catrinel Marina Gheorghe (96%) and the other 4% belong to Radu Tronaru⁵. In 2016, Catrinel Marina Gheorghe became the exclusive owner of the station. Since 2016, Romania TV is one of the most sanctioned TV stations for misconduct in respecting the ethical standards and the provisions of the Audiovisual Code. Along with Antena 3, Romania TV has endorsed the Social Democratic Party and its allies, and in the recent years has promoted conspirative narratives that supposedly expose the "deep state", George Soros interference in the Romanian political and civil systems, and the "progressive" movements as well.

The first news channel (Realitatea TV) aired in 2001 and it was a premiere for the expanding media market. In 2019, after 11 years of financial difficulties and high debts, Realitatea TV's broadcasting licence was transferred to Realitatea Plus. For the viewers, this change reflected mostly in a minor change of the brand. But the licence transfer, as well as the shareholders political and business interests could not be the sign of a fresh new start for the oldest news channel in Romania. A Newsweek Romania report revealed⁶ that the new company that took the licence was already in debts, whilst the shareholders have significant accountability issues. Currently, Realitatea Plus operates under the licence owned by **Geopol International SRL** – 99% of its shares are owned by Strategies Research Investments International SA and 1% by Alexandra Pacuraru, the daughter of one of the shareholders. Moreover, 99,9% of Strategies Research Investments International SA are owned by

¹ CNA. Shareholding changes in several positions. B1 TV - Păunescu leaves, Păunescu enters. Pro TV, change of indirect shareholder

² https://www.intactmediagroup.ro/despre-noi/profil-companie/

³ Sorin Alexandrescu became a shareholder in Antena TV Group

⁴ Felix's Philanthropy: Dan Voiculescu Foundation for the Development of Romania, shareholder in Antena 3

⁵ A new change in Romania TV's shareholders: The man who managed, in documents, Sebastian Ghita's television remains without shares

⁶ A new TV fraud possible with Guşă: Realitatea Plus, on a company with high losses and debts

Strategies Research Investments SRL and other 0,1% by the same Alexandra Pacuraru. The Newsweek journalists showed that actually the shareholding majority is equally distributed between Cozmin Gusa (former politician, consultant and media manager) and Marcel Pacuraru (investor in oil industry and previously imprisoned for embezzlement). Both Gusa and Pacuraru have a long history of business and media affiliations. Ideologically and politically the news station has been competing for years with Antena 3 and was perceived as a promotional platform for the National Liberal Party, the main political adversary of the Social Democratic Party. Starting 2019, the station changed its orientation as more PSD figures become more visible and prominent in their programs. Although the political leaning of the station has been self-evident over the years, Realitatea TV/Realitatea Plus never succeed to meet the financial and notoriety indicators of Antena 3 and Romania TV.

As opposed to Antena 3, Realitatea TV/Realitatea Plus and Romania TV, the other news channels, B1TV and Digi 24, are less influential and politicized in setting up the public agenda. Retrospectively, both stations have been subject to corruption or commercial misconduct scandals, but most of the time their owners have been discreet, and not so connected to the political spectrum.

Currently, Digi 24's licence is operated by **Campus Media SRL** (shareholders: RCS&RDS – 90% and Integrasoft – 10%, that is 100% owned by RCS&RDS). Over the last three years, the media group went through numerous reorganization procedures and also it extended its portfolio with various media.

In 2013, RCS&RDS (the largest cable and Internet provider in Romania, owned by Zoltan Teszari – telecom businessman) and Intact Media Group clashed in a commercial dispute that three years later transformed into a blackmail criminal investigation. In 2017, Intact Media Group was found guilty, and the executive director (Sorin Alexandrescu) was sentenced to prison, while one of the owners, Camelia Voiculescu (Dan Voiculescu's daughter; see above Intact Media Group description) was found guilty but she benefited of a suspended sentence.

In turn, in 2019, one of the RCS&RDS's vice-presidents and administrators was found guilty of commercial misconduct in negotiating the broadcasting rights for a football tournament. A month after the court sentenced loan Bendei, he resigned from RCS&RDS board. These economical and judicial challenges that RCS&RDS (including Digi 24) were dealing with raised some questions among journalists and influencers that were worried that Digi 24, a very respected news station, will be subject to other compromises that will reflect in their editorial policy as well.

In 2020, Digi 24 managed to increase its audience (both online and on TV programs) due to their approach on covering the COVID-19 pandemic. Also, according to Digital News Report 2020, Digi 24 is the second most trusted news source for urban audiences.

B1TV channel (established in 2001 as a generalist TV, that switched to news channel in 2011) has changed its shareholding twice in the last five years. The most recent change was in January 2020, when **ISMAR INTERNATIONAL NV** (Curacao) [50% participation] transferred all shares to Gheorghe Constantin Păunescu, father of George Marius Păunescu (aka Bobby Paunescu, the founder of B1TV Channel). This transfer was mostly administrative, as Bobby Paunescu's father has been the owner of ISMAR INTERNATIONAL NV (Curacao) since 2015. The other 50% of shares belong to Sebastian Oancea, who previously was a shareholder at Antena 3 too. Bobby Paunescu, perceived as de facto owner and founder of B1TV, is mostly known for his activity in the movie industry, where he acts as a producer and director. Paunescu did not show any political ambitions and he does not publicly affiliate with political parties. Recently he has been accused of financing the United Romanian Alliance (AUR), a nationalistic party that entered the 2020 – 2024 legislative, as an opposition party. Paunescu and AUR's leaders rejected the allegations and described their relationship as "mutual sympathy".

In terms of audience, in November 2020, the most visited news websites were⁷:

- 1. Digi 24.ro 11,5 million visitors (unique client)
- 2. Adevarul.ro 8.7 million visitors (unique client)
- 3. Stirileprotv.ro 7.1 million visitors (unique client)
- 4. Libertatea.ro 7.1 million visitors (unique client)
- 5. Capital.ro 6.6 million visitors (unique client)

Apart from the above-mentioned media outlets that are affiliate to various media groups in Romania, in the recent years several alternative and independent news and investigative media platforms emerged as a counteroffer to the polarized media arena.

Rise Project, established in 2012, is one of the most visible investigative journalism platforms in Romania. Over time, Rise Project has documented high corruption and organized crime cases. The platform has 32,5 k subscribers on their YouTube channel and 177 k followers on their Facebook page. All their revenues come from individual donations and investigative grants awarded by international professional networks.

Recorder.ro, established in 2017, is one of the most dynamic investigative platforms that transitioned to almost exclusive video content. The 10 journalists team has been very influential in the public sphere in last three years, as many of their investigative reports have generated consistent debates in the society. Recorder.ro has almost 300 k subscribers on their YouTube channel and 371 k followers on their Facebook page. At this moment, 70% of Recorder.ro revenues are covered by individual donors and the difference is covered by advertising.

Other independent investigative platforms to be mentioned are Dela0.ro, Safielumina.ro and Inclusiv.ro. All of them function on donations and dedicated grants for independent journalism.

The list of independent news media outlets that cover on daily basis the national agenda is also limited. The most visible independent news websites in Romania are Hotnews.ro (established in 1999), PressOne.ro (established in 2015) and G4Media.ro (established in 2018). Most of their revenues come from advertising and donations.

Although in the recent years the alternative and independent media got some traction due to online developments, it must be stressed that these media outlets struggle to reach audiences within a market that is dominated by large media groups or by partisan media that are controlled by politicians. As most of the advertising is directed to mainstream media, the economic model should probably be subscription based. Yet, in 2020, according to Digital News Report, only 17% of the Romanians living in urban areas were paying subscriptions for online news and reports.

Over the last 20 years, the entanglement of economic and political interests that dominate most of the relevant media outlets has affected media credibility and sustainability. Although social media and independent media managed to some extent to slow down the cartelization of media, these groups must be kept under scrutiny as social and political unrest is expected in the near future due to COVID-19 global context.

^{7 &}lt;u>SITE TRAFFIC. Digi24.ro, again, the site of the month,</u> Pagina de Media, using data provided by Internet Audience and Traffic Measurement (SATI)

2. MARKET CONDITIONS AND LAWS

In Romania there is no specific media law to regulate the functioning of the market, but there is secondary legislation that is applicable to media outlets. The Romanian Constitution (adopted in 1991 and revised in 2003) states the freedom of expression under the provisions of article 30:

Art. 30 - Freedom of expression

- The freedom to express thoughts, opinions or beliefs and the freedom of creation of any kind, orally, in writing, through images, through sounds or through other means of communication in public, are inviolable.
- 2. Censorship of any kind is prohibited.
- 3. Freedom of the press also implies the freedom to set up publications.
- 4. No publication may be deleted.
- 5. The law may impose on the mass media the obligation to make public the source of financing.
- 6. Freedom of expression may not prejudice the dignity, honor, private life of the person or the right to one's own image.
- Defamation of the country and the nation, incitement to war of aggression, national, racial, class or religious hatred, incitement to discrimination, territorial separatism or public violence, as well as obscene manifestations contrary to good morals are prohibited by law.
- 8. The civil responsibility for the information or for the creation brought to public knowledge rests with the publisher or director, the author, the organizer of the artistic event, the owner of the means of multiplication, of the radio or television station, in accordance with the law. Press offenses are established by law.

The Romanian Television Company (TVR) is the only media outlet that functions under a specific law (Law no. 41/1994, revised in 2017). The law recognizes that TVR is an autonomous public service of national interest. TVR has been subject to many controversies over the years as it has been targeted by political interferences both in management and editorial policies. Despite its protected role within the media landscape, TVR failed to be a flagship within the Romanian media and various reformative projects failed as well. The financing system is also controversial for TVR. Prior to 2017, the main funding source consistent in a monthly mandatory tax that was imposed to all households that were connected to the national electrical grid. In 2017, the former PSD Government cancelled the radio-TV tax and allocated a distinct budgetary line for SRTV within the state budget. At that time, the decision was highly criticized by media organizations and the President of the state who labelled Government's decision as drastic change of status for SRTV from "public broadcaster" to "state broadcaster".

All public or private audio-visual media outlets function under the supervision of the National Audi-Visual Council (CNA) and of the National Authority for the Management and Regulations in Communication (ANCOM).

CNA was established in 2002 as an autonomous authority under parliamentary control that oversees the quality of audiovisual programs. Also, it is empowered by law in granting audiovisual broadcasting licenses.

ANCOM is the body that protects the interests of the communications users in Romania, by promoting competition in the communications market, ensuring the management of scarce resources and encouraging innovation and efficient investments in infrastructure.

In their work, both regulatory bodies have been targeted by political interferences and controversies, yet for CNA the critics are even harsher as the institution is perceived as an extremely politicized body that protects the interests of corrupt media moguls.

For the advertising and marketing industry there are several self-regulatory professional bodies that represent both the industry's interests and consumers' rights as well. The most predominant organization is the Romanian Advertising Council⁸ (established in 1999) that monitors if the industry is compliant to the Code of Advertising. The entire advertising industry is functioning under the provisions of the Advertising Law (L 148/2000, revised in 2021), as well under the provisions of the Civil Code and of the specific consumers and commercial laws.

3. ADVERTISING TRENDS

After the 2009-2010 global economic crisis and its negative impact on the media market in the following years, starting 2017 the predictions and results became more positive. Romanian televisions still concentrate most of the advertising revenues, whilst online media is consolidating its position year by year. The net loser in terms of advertising and selling revenues seems to be the print media, following the global trends.

ROMANIAN ADVERTISING MARKET (mil. Euros)

all media (TV, online, radio, print and OOH)

2017	2018	2019	2020
412	454	480	467

Source: Annual Media Factbook reports (by the Initiative Agency)

The Media FactBook report, published by the Initiative Agency in June 2018, indicated that the Romanian advertising market continued to be on an upward trend. In 2017 it amounted to 412 million euros, with estimated investments of 454 million euros for 2018. Regarding television advertising, the total for 2017 was 273 million euros, and the forecasts estimated by Media FactBook for 2018 were about 300 million euros.

The same report shows that advertising for the print media continued to decline and reached only 13.4 million euros in 2017, and the analysis of Media FactBook suggested a stagnation in this segment for 2018.

Online advertising budgets, according to the same source, were 73 million euros in 2017 and were estimated at about 85 million euros for 2018. Media FactBook also showed that radio advertising was 23 million euros in 2017 and estimated an increase up to 26 million euros in 2018.

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⁸ https://www.rac.ro/en

In 2019, the upward trend continued for all media, excepting print media. From a total net of 480 million euros, 308 million euros were invested in television advertising and other 99 million euros in digital advertising.

The radio advertising increased from 26 million euros (2018) to 28 million euros in 2019. A one million euros increase was estimated for OOH advertising too (31 million in 2018; 32 million in 2019).

Print media advertising decreased from 13 million in 2018 to 12 million euros in 2019, and the decreasing trend was estimated for 2020 too.

At the end of 2019, 2020 estimates were optimistic and before the COVID-19 pandemic the total net advertising budget was forecast to surpass 500 million euros. If initially it was estimated that the television advertising will increase to 316 million euros (from 308 million euros in 2019) and the digital market will reach up to 115 million euros (almost 16 million euros increase compared to 2019), all the numbers were revised by mid 2020 and it was expected a major impact, similar to 2008 - 2010 economic crisis9. Eventually, the advertising market decreased only by 2,7% in 2020 and was estimated at a net worth of 467 million euros. The television advertising managed to reach the same amount as in 2019 (308 million euros), while the digital advertising was evaluated at 105 million euros (positive trend). The other media were negatively affected by COVID-19 economic side effects. Yet, it is expected that in 2021 the digital and television advertising to contribute slowly but steady to the economic revival of the sector¹⁰.

As for the market share, almost 66% of the advertising investments is directed to television advertising. This share is being constantly disputed by three commercial media groups: PRO TV SRL, owned by Central European Media Enterprises (the Romanian media group includes 16 media outlets, especially TV stations and online media), Intact Media Group (a Romanian cross-media platform that is divided in two distinct entities Antena Group SA and Antena 3 SA) and Kanal D, owned by the Turkish media holding Doğan Yayın Holding. Due to their high ratings and market share, but also to their decision to leave the must-carry system, they succeeded to be the most profitable media brand both nationally and regionally (Pro TV and Kanal D).

4. STATE ADVERTISING

The direct or indirect state advertising has been subject to many controversies and even to criminal investigations in the recent years. Various media investigations revealed that local authorities and political parties had various promotion or consultancy contracts with local and national media in order to keep the media more compliant and submissive when scrutinizing their activity.

In 2018, a media report produced by journalists at Recorder.ro (an independent media platform) revealed that in just three months, almost 1000 public procurements, estimated at a total cost of more than 800.000 euros, for promotional services, were signed between local municipalities or county administrations and various media outlets. The report estimated that local authorities spend up to three million euros on every year to control local media.11

In 2019, a media report produced by journalists at Newsweek Romania revealed¹² that, between 2017 and 2018, the Social Democratic Party (the ruling party at that time) has spent almost 2 million euros from state subsidies on promotional and consultancy contracts with various media outlets that were openly pro-governmental and very critical against the political and the civic opposition. Other media reports suggested that the presumed illegal spending was subject to a criminal investigation ran by the National Anticorruption Directorate, but by February 2021 there is no indication of an ongoing criminal investigation in this concern.

In 2020, a media report produced by journalists at G4Media.ro revealed that between 2016 and 2020, the Bucharest municipality (ran by Gabriela Firea, member of the Social Democratic Party) and various subordinate departments and companies have spent almost 10 million euros in promotional services and campaigns. The report also pointed out that some of the subordinate companies refused to disclose the contracts¹³. It is worth mentioning that this grounded practice has conflicted even with the September 2020 electoral campaign, when, despite the special electoral regulations, a significant number of advertisements promoting Gabriela Firea and the municipality have been aired while she was running for a new mandate. The Municipal Electoral Bureau recommended that all advertising should be suspended, but the decision came only a day before the election date14.

In April 2020, the Romanian Government, controlled by the National Liberal Party, who came in power in October 2019, after a censure motion against the PSD Government, has issued an Emergency Ordinance that would create a special fund for the national and the local media. The 40 million euros allocated budget was dedicated to all eligible media outlets that would run a four-month information and awareness campaign on COVID-19 effects. 55% of the allocated budget was directed to national and local televisions (47% national TV, 8% local TV), 23% was directed to online media and 12% to radio stations (8% national radio stations, 4% local radio stations). The remaining 10% were to be distributed for print media (5%), OOH (4%) and the publication of informative materials (1%)¹⁵. This consistent state aid has been subject to many critics as it lacked qualitative criteria and transparency. Moreover, this mechanism was expected to erode media credibility, as the "sold/bought media" narrative has amplified within various conservative circles in Romania, as well within the Romanians that were opposing Government restrictions. The controversies continued the following month as the Government was criticized for funding media outlets that were extremely politicized or have had major accountability and ethical issues. Thus, by mid-June 2020, the official estimates¹⁶ showed that Intact Media Group was to benefit of almost 45% of the total allocated budget for TV advertising (3,2 million euros out of 7 million euros). Paradoxically, due to the lack of qualitative criteria, among the selected traditional or online media, the Government advertising was directed to some media outlets that gained their outreach, over time, by promoting sensationalism, fake news and clickbait. Despite the generous initial allocation of 40 million euros, by the end of December 2020, the Government has reimbursed close to 16 million euros to all selected media. A report produced by the independent platform G4Media confirmed that Intact Media Group, owned by Voiculescu family, along with other media outlets controlled by corrupt moguls and politicians have benefited the most from this state aid¹⁷. At the moment of producing this report, the anti-COVID information and awareness campaign is still running on national and local level, as well as the controversies.

¹² The octopus of "journalists" and "analysts" paid by PSD

¹³ Firea administration flooded the media market with over 10 million euros for advertising / Two companies of the mayor's office refuse to say which televisions and publications received public money

¹⁴ BEM: Gabriela Firea made a disguised advertisement on the money of the Bucharest City Hall in the middle of the electoral campaign

¹⁵ The government approved. It will give 40 million euros for the press. Half for TV. What does the press do for this money? Everything about how the money will be allocated

¹⁶ Intact Group, the most money from the Government: over 3.2 million euros. ProSport Group, Cancan and <u>Gândul, the first online. Partial list of contracts. Who and how much does it take?</u>

¹⁷ The trust founded by Dan Voiculescu won the big pot from the government: 14.7 million lei from public money for the anti-Covid information campaign. What amounts did the other moguls earn

⁹ Compiled data from <u>Media Fact Book</u> produced by Initiative (2018, 2019 and 2020).

¹⁰ The Romanian media market decreased by 2.7% in 2020, manafu.ro, accessed on 15 of February 2021

¹¹ Local press, bought with public money: millions of euros for ode, arranged shows and congratulations

5. FINANCIAL PERFORMANCE OF MEDIA COMPANIES

After the devastating effects of the 2008 – 2010 economic crisis on the media market, the first positive trends in most media brands appeared in 2016. Ever since, the profitability increased in a steady manner and by 2019 only two companies were reporting losses at the end of the fiscal year.

The following data were collected from the Romanian Ministry of Finance website. The public balance sheets do not provide detailed descriptions on the sources of revenues so we cannot differentiate between advertising revenues and other types of services.

The amount registered in the tables are expressed in Euros and were conversed from the Romanian Leu (RO) to EUR by applying the annual median conversion rate value.

The current list includes the most relevant national news media that reach the highest audiences.

2017							
	Media mix	Operating licence	Brand	Net reve- nues (EUR)	Net profit/ loss (EUR)		
1	Online + print	Adevarul Holding SRL	adevarul.ro	20 387 322	9 775 599		
2	TV	B1 TV Channel SRL	B1 TV	3 290 386	632 513		
3	TV + online	ANTENA 3 S.A.	Antena 3	14 366 086	338 424		
4	Online	S.C Prestige MediaPHG S.R.L	realitatea.net	341 307	251 507		
5	Online + radio	Europe Developpement International R SA	europafm.ro	5 371 203	185 438		
6	Online	MEDIA BIT SOFTWARE SRL	hotnews.ro	1 076 486	185 286		
7	Online	SC EDITURA EVENIMENTUL SI CAPITAL SRL	evz.ro	2 180 056	179 464		
8	Online	S.C. EUROPEAN BUSINESS ENVIRONMENT S.R.L.	stiripesurse.ro	301 140	155 582		
9	Online	PRESS MEDIA ELECTRONIC SRL	dcnews.ro	427 818	135 760		
10	TV + online	Campus Media SRL	Digi 24 (HD)	96 764	44 020		
11	Online	SC Alert News SRL	ziare.com	509 331	8 920		
12	Online	ANCORE MEDIA SRL	b1.ro	253 718	1 663		
13	Online	SC RTV PROPERTIES MANAGEMENT SRL	romaniatv.net, economica.net	176 782	-2 626		
14	TV	SC RIDZONE COMPUTERS SRL	Romania TV	5 714 369	-1 954 190		
15	Online + print	RINGIER ROMANIA SRL	libertatea.ro	25 229 247	-4 624 064		
16	TV	S.C Realitatea Media S.A	Realitatea Plus	4 795 793	-6 748 852		

	2018							
	Media mix	Operating licence	Brand	Net reve- nues (EUR)	Net profit/ loss (EUR)			
1	Online + print	Adevarul Holding SRL	adevarul.ro	72 564 745	64 595 427			
2	TV + online	ANTENA 3 S.A.	Antena 3	18 215 914	2 044 674			
3	TV	B1 TV Channel SRL	B1 TV	4 003 229	1 296 755			
4	Radio + Online	Europe Developpement International R SA	europafm.ro	5 472 246	353 736			
5	TV	SC RIDZONE COMPUTERS SRL	Romania TV	7 142 920	351 663			
6	Online	S.C Prestige MediaPHG S.R.L	realitatea.net	620 203	341 164			
7	Online	ANCORE MEDIA SRL	b1.ro	631 371	240 658			
8	Online	SC EDITURA EVENIMENTUL SI CAPITAL SRL	evz.ro	2 538 738	224 490			
9	Online	MEDIA BIT SOFTWARE SRL	hotnews.ro	1 119 322	175 627			
10	Online	PRESS MEDIA ELECTRONIC SRL	dcnews.ro	836 960	148 998			
11	Online	S.C. EUROPEAN BUSINESS ENVIRONMENT S.R.L.	stiripesurse.ro	319 664	146 518			
12	Online	SC Alert News SRL	ziare.com	670 919	63 115			
13	TV + radio + online	Campus Media SRL	Digi 24 (HD)	153 077	55 656			
14	Online	SC RTV PROPERTIES MANAGEMENT SRL	romaniatv.net, economica.net	305 337	-53 897			
15	Online + print	RINGIER ROMANIA SRL	libertatea.ro	18 813 825	-1 474 861			
16	TV	S.C Realitatea Media S.A	Realitatea Plus	5 834 155	-1 562 166			

2019						
	Media mix	Operating licence	Brand	Net reve- nues (EUR)	Net profit/ loss (EUR)	
1	TV	SC RIDZONE COMPUTERS SRL	Romania TV	12 976 828	5 701 132	
2	Radio + Online	Europe Developpement International R SA	europafm.ro	5 663 923	4 289 752	
3	TV + online	ANTENA 3 S.A.	Antena 3	21 524 549	3 376 246	
4	TV	B1 TV Channel SRL	B1 TV	5 722 478	2 727670	
5	Online	S.C Prestige MediaPHG S.R.L	realitatea.net	799 485	512 967	
6	Online	S.C. EUROPEAN BUSINESS ENVIRONMENT S.R.L.	stiripesurse.ro	712 935	443 224	
7	Online	PRESS MEDIA ELECTRONIC SRL	dcnews.ro	1 518 094	326 767	
8	Online	ANCORE MEDIA SRL	b1.ro	983 048	246 951	
9	Online + Print	Adevarul Holding SRL	adevarul.ro	10 171 920	225 961	
10	Online	SC Alert News SRL	ziare.com	800 603	165 826	
11	Online	MEDIA BIT SOFTWARE SRL	hotnews.ro	1 081 362	62 911	
12	Online	SC EDITURA EVENIMENTUL SI CAPITAL SRL	evz.ro	2 765 131	26 605	
13	TV + radio + online	Campus Media SRL	Digi 24 (HD)	5 253 055	9 070	
14	Online	SC RTV PROPERTIES MANAGEMENT SRL	romaniatv.net, economica.net	375 557	-30 749	
15	Online	RINGIER ROMANIA SRL	libertatea.ro	18 581 759	-1 117 616	
16	TV	S.C Realitatea Media S.A	Realitatea Plus	6 401 089	-3 032 974	

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6. INFLUENCE OF ONLINE AND SOCIAL MEDIA

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According to Digital 2021 Report¹⁸, last year, from a total population of 19,18 million more than 16,6 million Romanians, aged 18 and above, had access to internet (86,8%). The same report revealed that the average amount of time spent online, on daily basis, is of 7,26 hours, whilst the TV time is of 3,2 hours. The most popular social platforms are YouTube (11,8 million users) and Facebook (11 million). The most impressive development was for TikTok, as the platform reached 5,3 million users in 2020¹⁹ and surpassed Instagram that has 5 million users. These dramatic changes might be explained in COVID-19 context when Romanians looked up for alternative entertainment platforms.

In Romania, online is the most important news source in urban areas, were 83% of users access online media and social media to get their information (2020)²⁰. TV was mentioned by 76% of internet users in urban areas, although the score might be higher in rural areas where internet penetration is rather poor, and the population is less digital literate.

According to Digital News Report 2020, the most trusted news brands are Pro TV (2.8 million subscribers), Digi 24 (1.1 million subscribers), Ziarul Financiar (358 k subscribers) and Mediafax (445 k subscribers). The least trusted media brands are Romania TV (1.2 million subscribers) and Antena 3 (101 k subscribers). It is worth mentioning that the news outlets that scored the lowest in trust are perceived as politically biased and their trustworthy is not reflected in their economic performance. Also, except Romania TV, all mentioned media brands are part of solid media groups that are well-known to the general public.

7. THE ROLE OF THE BROADER ECOSYSTEM IN THE MEDIA

After more than three decades of democracy and free press, the Romanian media land-scape is still struggling to develop a sustainable business model and to find its identity. Although in the recent years there were no aggressive or irreversible governmental or political interferences on media market, the general perception is that the media landscape is captive between economical and political constraints. The 2020 "State of the media" report produced by Center for Independent Journalism²¹ provides a gloomy picture of the current media landscape in Romania between 2016 and 2020. According to the authors, the 2008 economic crisis has profoundly affected the independence and the credibility of the national and local media. The direct censorship and control from the politicians, more present in the early 2000s, were replaced by various forms of state advertising, local media being the most affected by this phenomenon.

According to media, the Social Democratic Party (the most dominant political party within 2012 and 2019) has been one of the most generous sponsors for various media outlets (more details in State advertising section) and gained favorable coverage and endorsement. Starting 2020, due to the pandemic context, the new liberal government has allocated 40 million euros, indiscriminatory, to Romanian media for promoting COVID-19 awareness and information campaigns.

The political clientelism along with financial incentives have assured the economic survival of some media outlets and that increased self-censorship within the newsrooms.

¹⁸ Digital 2021, Hootsuite. We are social

¹⁹ TikTok surpassed Instagram in Romania in number of users; Here are the numbers

²⁰ <u>Digital News Report 2020</u>, Reuters Institute & University of Oxford, page 80

²¹ State of the media in Romania, 2020 - CJI

SLOVAKIA MEDIA MARKET

hanks to analysts, media researchers and civil society organisations in Slovakia, but also in the Czech Republic (in fact, Czechia and Slovakia remain closely linked via media owners and entrepreneurs), there are useful sources of information about the Slovak media market. Key sources on media ownership and developments in this area reflected in the first chapter of the report are as follows: *omediach. com, medialne.trend.sk, MediaGuru.cz, mediahub.sk, strategie.hnonline.sk* and Transparency International Slovensko. Data reflecting financial results of companies was acquired via finstat.sk, and data about advertising in media was provided by Kantar.

1. OWNERSHIP STRUCTURE/CHANGES

TV and Radio Broadcasters

Broadcast Media are overseen by the Council for Broadcasting and Retransmission (Council) and, in the case of public broadcaster Rozhlas a televízia Slovenska (RTVS), also by the RTVS Council. Council for Broadcasting and Retransmission is the body that also issues licenses for broadcasting. In 2019 the number of licenses in the TV sector was 220 in total, distributed as follows: 8 licenses for multi-regional broadcasting, 9 licenses for regional broadcasting, 25 licenses for local broadcasting and 178 licenses for digital broadcasting. These licenses for digital broadcasting also included 3 for public broadcaster RTVS. There were 5 licenses for Markíza Slovakia and 3 for MAC TV/JOJ Media House, both of them major media houses whose most popular TV channels are TV Markíza and TV JOJ, respectively.

¹ Details about licenses gathered via Council for Broadcasting and Retransmission; http://documents.rvr.sk/_file_system/ZOZNAM_TV__licencii_2019_priloha_7.pdf

In the radio sector, in 2019, the total number of licenses were 68; the licenses were distributed as follows: RTVS operated 5 different radio stations with terrestrial transmission and there were 12 licenses for multi-regional broadcasting, 15 licenses for regional broadcasting, 13 licenses for local broadcasting and 23 licenses for digital broadcasting, including 9 for RTVS.²

Ranking of broadcast media

According to a recent survey of media consumption from late 2020, the total viewership of all televisions was 77 per cent; television was watched by 3.4 million viewers.³ TV Markíza with 39 per cent was in the first place, followed by TV JOJ (28 per cent), and the third was RTVS's Jednotka (23 per cent). The same ranking was recorded by these three TV stations in the market share parameter, TV Markíza (28 per cent), TV JOJ (18 per cent), RTVS's Jednotka (14 per cent)'.

Concerning radio stations (most listened to on a weekly basis), the most popular was private radio Rádio Expres (37 per cent), followed by public Rádio Slovensko together with private radio Fun rádio (both 26 per cent). The research indicate that radio is listened to regularly by some 59 per cent of the population. An inquiry on which radio station respondents listened to one day before the survey was conducted and delivered similar results - Rádio Expres was in the lead with 17 per cent, followed by Rádio Slovensko (15 per cent) and Fun rádio (10 per cent). Next was Rádio Europa 2 (8 per cent), Rádio Vlna and Rádio Jemné who both gained 7 per cent, followed by public radio station Rádio Regina with 5 per cent. Rádio Expres also dominated as a leader in market share, with 21 per cent, followed by Rádio Slovensko (19 per cent) and Fun rádio (12 per cent).

According to survey conducted by MEDIAN.sk agency in 2020, RTVS TV news (Jednotka) was perceived among Slovak citizens as the most objective TV channel in terms of news coverage.⁴ About one quarter of respondents described it as the most objective in each quarter of 2020. TV Markiza and TV TA3 followed, with TV Markiza being perceived as the second most objective during most of 2020, except for the last quarter of the year, when it was surpassed by TA3 which was perceived as most objective by (20,3 per cent of respondents), while in the first three quarters of 2020, it was perceived to be the third most objective TV channel. In the last quarter, TV Markíza was perceived as the most objective by almost the same number of respondents (20.2 per cent of respondents) while TV JOJ came in fourth, with 18.2 per cent of respondents who mentioned this TV.

Public Broadcast Media

Rozhlas a televízia Slovenska (RTVS) is the Slovak public broadcaster that is composed of both public TV and public radio. It was established in January 2011 in a merger of Slovak TV (STV) and Slovak Radio (SRo), two separate public entities that existed as public media services from January 1993. RTVS currently operates 3 TV channels and 9 radio stations. (For more information about RTVS, please see the chapter Public Service Media in this project.)

Private Broadcast Media

TV Markíza is a private TV, and the most popular Slovak television in the long run. It started its broadcasts in August 1996. TV Markíza belongs to Markíza group which is part of the CME (Central European Media Enterprises Ltd., currently owned by PPF Group established by Peter Kellner, recently deceased richest Czech businessman). It also controls TV channels TV Doma (started in 2009), Dajto (2012) and Markíza International (2016). TV Markíza mainly offers entertainment, but it also has a strong and influential segment of news and current affairs programmes. TV Markíza played an important role in political life in the late '90s (mainly prior to parliamentary elections in 1998|) creating a counter-balance to then existing de-facto monopoly on national public service media.

TV JOJ is a commercial TV which belongs to the portfolio of the JOJ Media House and is generally the second most popular TV channel. TV JOJ began broadcasting in 2002 and was built on an existing license and operations of a relatively small TV Global that existed from 2000. Nowadays, the JOJ Group includes a total of seven television stations for various audiences. TV JOJ is the most popular TV channel of this group, it is family oriented and has news segments, albeit rather short in comparison to other key TV channels. The second channel called PLUS started broadcasting in 2008, and it targets men and dynamic women. The third channel called WAU focuses on younger female viewers and was launched in 2013. In 2015, JOJ Group entered the paid TV segment, bringing three new pay-TV stations - Rik, Ťuki TV and JOJ Cinema. Children's television (preschool and younger school age-oriented TV) in Slovak language is called Rik. The second children's station, Ťuki TV, is a premium channel. JOJ Cinema was launched based on a Czech license, and it broadcasts the latest premieres of the biggest cinema hits for all film fans, without interrupting the films with adverts. As of 2016, another JOJ Family station began broadcasting exclusively for Czech viewers, replacing the parent Slovak stations (JOJ, Plus and WAU), which did not have the necessary license for the broadcast of foreign titles in the Czech Republic.

JOJ Media house is part of the activities of the J&T business group, financial group based in Czech republic controlled by Slovak financiers. Portfolio of actors associated with this group also includes Radio Services (which sells advertising for popular private radio stations Jemné, Rádio Vlna, Anténa Rock), while R. Korbačka, one of associates of J&T oversees radio station Europa 2. J&T lead figure Patrik Tkáč is a co-owner of Czech Media Invest, which co-owns several radio stations in the Czech Republic, Romania and Poland.⁵

TA3 is the private TV that broadcasts programmes 24-hours a day, mainly news but also some current affairs programs. It was launched in September 2001, starting its first broadcasts on September 11 soon after the attack on the World Trade Center. It is owned by Ivan Kmotrik (one of the richest Slovaks), who 'got' the television in 2006 thanks to an "exchange" with financiers from J&T. At that time, Kmotrík's Grafobal Group sold its JOJ television and acquired the TA3 news television from J&T.

There are other relevant TV channels, for instance TV LUX (Slovak Christian (Catholic) television established in 2008 as a joint project of the production studio Lux Communication, the Salesian order Don Bosco in Slovakia and the Conference of Catholic Bishops of Slovakia) and several regional televisions offer current news from their respective regions, as well as an overview of activities and attractions, and often their own journalistic programs.

² Details about licenses gathered via Council for Broadcasting and Retransmission; http://documents.rvr.sk/file-system/2-Zoznam-R-licencii 2019.pdf

³ National <u>survey</u> of media consumption, media and lifestyle Market & Media & Lifestyle - TGI for the second and third quarters of 2020 conducted by Median Sk. The survey was conducted on a sample of 4128 respondents from March 30 to September 13, 2020. https://strategie.hnonline.sk/media/2244029-markiza-expres-a-novy-cas-su-najsledovanejsie-slovenske-media

⁴ Survey by Median.sk https://strategie.hnonline.sk/media/2304162-najobjektivnejsie-televizne-spravoda-jstvo-mala-v-minulom-roku-rtvs0 In the survey, respondents answered the question "Which television do you think has the most objective news?". Respondents could only identify one television, with almost 15 percent of respondents not commenting on the question. https://strategie.hnonline.sk/media/2304162-najobjektivnejsie-televizne-spravodajstvo-mala-v-minulom-roku-rtvs

⁵ https://medialne.trend.sk/radia/prechod-europy-2-j-t-je-specateny-radio-ovladol-roman-korbacka; https://www.omediach.com/tv/item/7283-pod-JOJ-media-house-nepatria-len-televizie and https://dennikn.sk/blog/222737/ako-to-je-s-jt-televiziami-a-radiami/

⁶ https://plus7dni.pluska.sk/fotostory/medialni-magnati-slovensku-tu-je-11-najvplyvnejsich-muzov-ktori-ri-adia-nase-media/2

Another influential (given the size of its audience) private radio is Fun rádio. It began broadcasting in June 1990. Fun radio is owned by Boris Kollár, who is a current Speaker of Parliament and the leader of the second strongest coalition party Sme Rodina. Outside of music shows, Fun rádio offers short news.

Other popular radios are Rádio Europa 2, Rádio Vlna and Rádio Jemné. Like Fun radio, they also offer only short news. Catholic radio Lumen is a radio with content aimed at religious audiences. This radio also offers substantial news programmes reflecting Slovak and global developments.

Print media scene

There is no regulatory body for print or online media in Slovakia. However, there is a self-regulatory body called Tlačovo-digitálna rada Slovenskej republiky. Total readership of national dailies reaches some 30 per cent of the population. Nový Čas - the best-selling daily in Slovakia for decades - holds the first position with 14 per cent. It is a tabloid newspaper focusing on current events. It is owned by FPD Media/Publishing house Anton Siekel who was a co-founder of the Istrokapitál financial group and is the current head of the Slovak Olympic and Sports Committee.

It is followed by the daily Plus jeden deň (6 per cent) - a tabloid newspaper published by News and Media Holding of the Penta Investments Limited (its key figures are Czech Marek Dospiva and Slovak Jaroslav Haščák, who has been, in recent months, investigated in connection to alleged corruption linked with political scandals). Portfolio of News and Media Holding includes dozens of titles - for example, the most popular weekly PLUS 7 DNÍ, the economic weekly Trend and the monthly Emma. News and Media Holding enlarged its portfolio with titles previously owned by Swiss publishing house Ringier Axel Springer (such as Život, Nový čas pre ženy and Eva).

A handful of serious daily newspapers exist in Slovakia, most of which, with exception of Denník N, exist for three decades or more. According to the number of readers the most read serious dailies are as follows: Pravda (6 per cent), SME (5 per cent), Hospodárske noviny and Denník N (both 3 per cent).

Pravda is a former communist daily in Slovakia (first published on September 15, 1920), today a liberal-leftist daily focusing on current events and politics. During the communist regime, Pravda played a key role in spreading the propaganda of the monopoly ruling Communist Party of Czechoslovakia. It is currently published by PEREX that is controlled by of the Czech businessmen Ivo Valenta and Michal Voráček.

SME is a daily established in 1993 on the basis of a protest by a part of the editorial board of the daily Smena (former daily newspaper Smena published is since 1945 in Czechoslovakia) against the intervention of government in its activities. It focuses on news with regular and irregular supplements. It is published by Petit Press, owned by Prvá slovenská investičná skupina. From 2014 until recently, some 40 per cent of Petit Press shares were owned by Penta. It left Petit Press in April 2021, as it sold 34 per cent of Petit Press shares

to Media Development Investment Fund (MDIF), New York-registered non-profit organisation investing in media developments projects and remaining shares were sold to Petit Press managers.⁸

Hospodárske noviny is a national daily with an emphasis on the economy, published in Slovakia since 1993. Its publisher is MAFRA Slovakia, a.s. (formerly ECOPRESS, a.s.), which is currently owned by the Czech billionaire of Slovak origin Andrej Babiš, prime minister of Czech Republic, whose companies also control several media in Czech Republic.

Denník N - an independent daily, founded in 2014 by journalists who left the SME daily in a reaction to then potential takeover of Petit Press by Penta (mentioned above). While Penta only become a minority shareholder of Petit Press in 2014, a large number of journalists decided to leave SME and formed Denník N. In 2015, six co-owners of the global software company ESET from Bratislava - Maroš Grund, Rudolf Hrubý, Richard Marko, Peter Paško, Miroslav Trnka and Anton Zajac - joined the five original founders as investors and acquired a 51 per cent stake in Denník N. Anton Zajac also become one of the first three financial supporters of the non-parliamentary political movement Progresivne Slovensko (November 2016).9

Among weeklies and magazines, the most popular weekly (copies sold in March 2021) is Plus 7 Dní (published by News and Media Holding owned by Penta) followed by Eurotelevíza (Mafra), Život (published by News and Media Holding owned by Penta), Katolícke noviny (published by Spolok svätého Vojtecha, - Slovak Catholic publishing house) and fifth was Nový čas pre ženy (again published by News and Media Holding owned by Penta). These figures are provided by Audit Bureau of Circulations.¹⁰

Key private media/ ownership structure¹¹

TV					
Owner, group	Company	Media outlets			
PPF Group ¹²	CME Slovak Holdings B.V. – MARKÍZA SLOVAKIA s.r.o.	TV Markíza (Doma, Dajto, Markíza International, tvnoviny. sk, markiza.sk)			
J&T & Richard Flimel	JOJ MEDIA HOUSE (MAC TV)	TV JOJ (Plus, Wau, Rik, Ťuki TV, JOJ Cinema, JOJ.sk, noviny.sk)			
Ivan Kmotrík (GRAFOBAL GROUP a.s.)	(C.E.N.)	TV TA3, ta3.com			

Radio					
Owner, group	Company	Media outlets			
Boris Kollár	FUN MEDIA GROUP	Fun rádio, and related websites			
Richard Flimel (affiliated with J&T)	RADIO SERVICES	Rádio Vlna, Rádio Jemné, Rádio Anténa Rock			
Roman Korbačka (affiliated with J&T)		Europa 2			
Bauer Media	EXPRES MEDIA k.s., D.EXPRES k.s.	Rádio Expres			

⁸ https://e.dennikn.sk/minuta/2361697

⁹ https://plus7dni.pluska.sk/fotostory/medialni-magnati-slovensku-tu-je-11-najvplyvnejsich-mu-zov-ktori-riadia-nase-media/7

¹⁰ http://www.abcsr.sk/aktualne-vysledky/aktualne-vysledky/

¹¹ https://www.forbes.sk/mapa-medialneho-trhu-sa-prekreslila-pozrite-si-kto-vlastni-slovenske-media/and https://www.mediaguru.cz/clanky/2018/09/infografika-prehled-vlastniku-slovenskych-medii/

¹² Peter Kellner from Czech Republic, the main owner of the group died in March 2021

Print					
Owner, group	Company	Media outlets			
Penta Investments Limited	NEWS AND MEDIA HOLDING	Plus Jeden Deň, Plus 7 Dní, Trend, Šarm, Báječná žena, Život, Záhradkár, Zdravie, Dobré jedlo, Poľovníctvo a rybárstvo, Új szó, Vasárnáp, Eva, Madam Eva, Emma, Nový čas pre ženy, Nový čas krížovky, Nový čas bývanie, Geo & related websites			
Ringier Axel Springer Media & Milan Dubec	RINGIER AXEL SPRINGER SK	Aktuality Azet, Noizz.sk, Zive. sk, Šport.sk (share 2/3), and specialised websites			
Denník N, a.s. (Private investment of Eset shareholders & management of te company employees)	N Press	Denník N, Dennikn.sk			
Private investment of Eset shareholders & management of the company and employees	DENNÍK N, a.s.	N Press, Denník N, Dennikn.sk			
Juraj Vajda, Vladimír Rajčák, Miroslav Mihalus, Viliam Maroš and others – Prvá slovenská investičná skupina (60 per cent) & MDIF (34 per cent) and Petit Press managers (remaining shares)	PETIT PRESS	SME, Sme.sk Sme ženy, TV Okno, TV Svet, Korzár, MY, Slovak Spectator, Profit & other media outlets			
Andrej Babiš	ZVERENECKÉ FONDY - AGROFERT - MAFRA SLOVAKIA	Hospodárske noviny, hnonline. sk Téma, Evita, Stratégie, Zdravotnícke noviny, Eurotelevízia, TV Max, Rytmus života, Chvíľka pre teba, Tele magazín pre ženy, Čas na lásku, Balans, Happy, Lenna, Naša záhrada & other titles			
lvo Valenta (70 per cent) & Michal Voráček (30 per cent)	OUR MEDIA - PEREX	Pravda, pravda.sk Varecha.sk, Parlamentnelisty.sk			
Otto Berger and other shareholder of Niké	ŠPORT PRESS	Denník šport, Šport.sk (share 1/3)			
Erik Conrad a Peter Barecz	Barecz & Conrad Media s.r.o.	Forbes Slovensko			

Ownership changes

Well-known world names operated on the Slovak media market ¹³ in past decades SME recalled analyses of the Slovak media market. For example, the publisher of the German daily Handelsblatt (Hospodárské noviny), the Daily Mail partially controlled Pravda (currently the most popular non-tabloid daily newspaper), while the German Verlagsgruppe Passau was the co-owner of the SME daily (second most popular non-tabloid daily newspaper). The changes began back in 2008, as the German publisher Verlagsgruppe Handelsblatt sold Slovak Hospodárské noviny to Czech billionaire Zdeněk Bakala. However, he owned Hospodárské noviny for less than five years, when Andrej Babiš's group (MA-FRA) took its ownership.

The most significant change on the market (not only in Slovakia but in the regional context) happened in 2019 as TV Markiza (the most popular and profitable actor on Slovak media market), together with a group of other about 30 television channels in Bulgaria, the Czech Republic, Romania, Slovakia and Slovenia, owned by CME, was purchased by the PPF group. PPF also owns the O2 sports station in the Czech Republic.

At present, only a pair of renowned foreign media houses remained operating in Slovakia - Ringier Axel Springer Media and Bauer Media Group. However, in recent years, both groups have significantly decreased their operations in Slovakia. Ringier Axel Springer sold the print division including its flag ship Nový Čas (the most popular daily tabloid in Slovakia), which was purchased by Anton Siekel's FPD Media. Magazines owned by Ringier Axel Springer were bought by News and Media Holding controlled by Penta Investments. Ringier Axel Springer keeps only the Internet division headed by the Aktuality.sk news portal. Bauer Media remained active in Slovakia only in the radio business, as it still owns the most popular Slovak private radio, Rádio Expres. A recent by Media Development Investment Fund (MDIF) purchase of minority shares of Petit Press from Penta was an interesting exception in opposite direction.

The rest of the market, at least its most profitable media, is divided among Czech-Slovak entrepreneurs. The most notable is case of TV JOJ, part of JOJ Media House, in fact controlled by J&T's affiliates through companies registered in Cyprus. Through its media holding company, J&T has also access to four major private radio stations.¹⁴

Penta Investments expanded in the media sector in 2014, when it gradually created the largest publishing house in Slovakia, which includes, for example, Plus 7 days, Plus 1 day or Trend. It also held minority shares of Petit Press until very recently.

TA3 news television is owned by businessman Ivan Kmotrík and it is known for its favourable coverage of some politicians of former government (led by SMER political party).

Furthermore, numerous magazines owned previously by Bauer Media became part of MAFRA Slovakia publishing house, controlled by Andrej Babiš.

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¹³ https://index.sme.sk/c/22247023/markiza-je-bodkou-slovensky-medialny-trh-si-naporcovali-financnici.html

¹⁴ The media house JOJ was founded in 2010. Since then, an influential media house JOJ Media House has formed around it, which includes not only television, but also advertising companies, websites and radio. Its chairman, Richard Flimel, former CEO of JOJ, joined television in 2007 when J&T bought the broadcasting company from Ivan Kmotrik's Grafobal through J&T Media Enterprises. The shares of JOJ Media House are owned by the Cypriot company TV JOJ L.P and Richard Flimel. JOJ Media House also became the owner of Ladislav Rehak's HARAD. Through this company, he owns a majority stake in Radio Services, a service organisation that provides services to three radio stations. It provides broadcasting, programming and the sale of advertising space. Sources: https://plus7dni.pluska.sk/fotostory/medialni-magnati-slovensku-tu-je-11-najvply-vnejsich-muzov-ktori-riadia-nase-media/2

2. MARKET CONDITIONS AND LAWS

Key pieces of legislation regulating the media sector in Slovakia include the 2000 Broadcasting Law, the 2007 Digital Broadcasting Law complementing the Broadcasting law, the 2001 Law on Advertising, and the 2008 Press Law, and their amendments.

Freedom of speech and the right to information are guaranteed by the Constitution, which states that everyone has the right to express their opinions in writing, print, through pictures or any other means. Press publishing does not require any approval; censorship is forbidden.

Freedom of expression and the right to information can only be restricted if such a measure is needed to protect the rights of others, national security, public order or health and morals. However, high damages in civil libel cases and the criminalization of defamation, publishable by up to eight years in prison, present challenges to freedom of expression.¹⁵ This severe punishment remains a serious challenge to freedom of expression, and as such, it has been abused by politicians or other public figures to sue journalists. One of the frequent problem Slovak journalists face have been (especially by previous governments led by R. Fico) verbal attacks by politicians.

Furthermore, the 2019 amendments to the Press Law reintroduced the right of reply for politicians and public officials whose honour or reputation has been damaged by media content. Refusal by the media to publish a reply may be punished by up to EUR 5,000 in damages. According to OSCE/ODIHR's report from 2020 parliamentary elections: "Such provisions can lead to self-censorship and undue interference in the editorial independence of the media when reporting on matters of public interest." ¹⁶

Concerning access to information, according to the Press law, "public authorities, their budgetary organizations and contributory organizations and legal entities established by law" are required to provide the media with information about their activities in a truthful, timely and comprehensive manner to inform the public. The scope of information that they are obliged to provide is determined by the 2000's Freedom of Information Act. The law allows replies to be sent within eight working days, which is relatively long period for journalists.

The current government coalition (established in spring 2020) stated its intention to amend legal framework in favour of freedom of press by introducing changes in favour of better protection of journalists' sources (regardless of whether it is a traditional media or an online media), and easier access to information.¹⁷ Currently, protection of sources is regulated by Press law.¹⁸ Media are obliged to maintain the confidentiality of the source, but this does not apply to media that are not in the register of periodicals. Better protection of sources could be achieved by creating an obligation for online media to follow a more rigorous way of registrations, which could also lead to improved transparency in media ownership. However, such measures could also limit freedom of media, but no amendments have yet been presented to public in a form of a concrete legal proposal.

The 2000's Broadcasting Law prohibits cross-ownership in media. The publisher of a national newspaper cannot own a national radio or television at the same time. TV operator cannot own a radio. Furthermore, one owner can operate only one nationwide radio, but can operate other stations via the Internet. Networks of radio stations are only allowed for local media.

The press, unlike radio and television, it is not subject to regulation, publishers are obliged to register it with the Ministry of Culture and report changes.

There are specific quotas for placement of Slovak music in radio stations. Private radios must play at least 20 per cent of Slovak music, while the per centage is higher for public media.

The 2015 Copyright Act provides basic legal regulation in the field of copyright. It represents a transposition (transposition) of European Union law in this area (also called "European copyright").

The 2001 Law on Advertising defines the performance, presentation, or other communication related to a business or entrepreneurial activity, or other gainful activity, with the aim of placing products on the market. It defines what the advertisement must not contain.¹⁹ The Act defines the method of dissemination of advertising, which may not consist of an automatic telephone call system, fax and e-mail without the prior consent of their own user, who is the recipient of the advertisement. Also, advertising must not be disseminated contrary to good morals and present products whose production, sale, provision, or use are prohibited, or present products or services whose unauthorized manipulation is prohibited by special regulations.

Media House recently became the 100% owner of the HARAD company of entrepreneur Ladislav Rehák. Through this company, it owns a 100% stake in Radio Services. It is a service organization that provides services to three radios. Provides broadcasting, programming and sales of advertising space. https://www.omediach.com/tv/item/7283-pod-JOJ-media-house-nepatria-len-televizie; https://dennikn.sk/1663511/podakuju-sa-raz-slovenske-media-hascakovi/; and https://strategie.hnonline.sk/media/2030332-mafra-slova-kia-sfuzuje-s-byvalou-bauer-media

¹⁵ Criminal Code No. 300/2005, Art. 373 (Defamation) defines defamation as communicating false information about another person that can seriously damage the person's reputation among fellow citizens, the person's career, business, and/or family relations, or cause the person serious harm. The punishment is imprisonment for up to two years. If the act of defamation causes substantial damage, the maximum prison term is increased to five years. If the act causes large-scale damage, loss of employment, or divorce, the offender faces three to eight years in prison. Art. 423 (Defamation of nation, race and beliefs) of the Criminal Code prohibits defamation of a "nation, its language or any race or ethnic group" in addition to "a group of persons or an individual due to their real or perceived affiliation to a race, nation, nationality, ethnic group, real or imagined origin, colour, political beliefs, religion or lack of religion". The penalty is imprisonment for one to three years. If the act is committed by a member of an extremist group, a public official or with special motives, the penalty is imprisonment for two to five years.

¹⁶ OSCE/ODIHR report from 2020 parliamentary elections

¹⁷ https://dennikn.sk/2232033/novinari-a-ich-zdroje-dostanu-ustavnu-ochranu-a-nemalo-by-im-hrozit-stih-anie-za-ohovaranie/

¹⁸ The publisher of a periodical and the press agency are obliged to maintain the confidentiality of the source of the information obtained for publication and the content of this information so that the identity of the source cannot be established if requested by the natural person who provided the information. Only the person who provided the information may release the publisher from the protection of the source. Protection does not only apply to cases "where there is an obligation imposed by law to prevent the commission of a criminal offense.

¹⁹ The list of these issues that the advertising must not contain includes the following points: anything that degrades human dignity, insults nationality or religion, as well as any discrimination based on sex, race or social origin; promotion of violence, vandalism or vulgarity and incitement or consent to the offense; present the nudity of the human body in an offensive way; present products which are harmful to the environment or which are harmful to the life or health of humans, animals or plants, without any explicit indication of harmfulness; endanger the physical health or mental health of the citizen; present food and nutritional supplements as if they had the effects of medicines; contain personal data, data on the property of persons without their prior consent; refer to statements made by others without their prior consent; interfere with the rights of others without their consent; abuse the trust of minors, in particular to encourage behaviour which may endanger their health, mental or moral development or to depict them in dangerous situations. Source: https://www.pravnenoviny.sk/reklama-pravna-uprava

There is a specific restriction related to ways of advertising of alcoholic products (for instance from 6 am to 10 pm it is not allowed to advertise any other alcohol except beer and wine) and tobacco products. Advertising of weapons and ammunition is strictly prohibited and there is also a prohibition on advertising of drugs that have not undergone official registration. The advertising of products for infants may not include a representation of the infant. Comparative advertising (comparison with other products, brands) is allowed only if it is not misleading. It is meant to prevent any unfair competition meaning any competitive activity that is contrary to honest practices in trade and industry and is liable to cause harm to other competitors or consumers.

Product placement in TV broadcasts is regulated further by the 2007 Law on Digital Broadcasting. It allows for relatively frequent interruption of programs by ads. Private stations can broadcast up to 12 minutes of commercials per hour. Public RTVS can have a maximum of 0.5 per cent of the transmission time reserved for advertising and another 2.5 per cent of teleshopping. The broadcaster is responsible for advertising. The compliance with advertising is supervised by the Broadcasting Council that can impose sanctions (including severe fines) for violations of provision of Broadcasting law including failure to comply with provision on advertising.

In the area of advertising ethics, the industry itself established the Advertising Council, a self-regulatory body. The main goal of the body is to ensure and promote the spread of honest, decent, legal and truthful advertising in the Slovak Republic. Its decisions have no legal weight but are binding on all members. They adopted the Code of Ethics - Ethical Rules of Advertising Practice; the current version of the Code, was amended in May 2019.

3. ADVERTISING TRENDS

The theoretical size of the media advertising market in Slovakia in 2019 was slightly over 2,5 billion Euro; more than 80 per cent of the media market is occupied by TV. According to monitoring of advertising in the media sector conducted by Kantar (agency dealing with marketing data and information, customer insights and consulting. Kantar Slovakia is a continuation of the traditional leader on the Slovak market, TNS Slovakia), advertising amounted to a total of 2,518,813,088 € in 2019. Compared to 2,456,396,235 € in 2018, there was only a slight increase, but a significant rise was apparent in 2018 compared to the figure of 1,702,856,477 € in 2017. This overall jump was a result of increase in TV segment (from 1,264,165,072 € in 2017 to 2,041,426,018 € in 2018).

These figures are calculated based on list prices, without discounts, barters and bonuses. According to estimates by representatives of media agencies, net advertising expenses grew by an average of 3.3 per cent in 2019, reaching 372 million Eur. From these figures, it can be estimated that discounts on list prices reach up to 85 per cent.²⁰ Over 83 per cent of total advertising spending was taken by TV sector.

There is a huge gap between the leading TV and the other media segments. The Radio market (about 4 per cent market share and steadily growing in past few years) is followed by the Internet (slightly less than 4 per cent) and Magazines (less than 4 per cent and declining in the past years). The biggest increase in 2019 was recorded in the Internet segment (from $72,004,554 \in$ in 2018 to $96,856,177 \in$ in 2019), however, the total amount of advertising in Internet segment in 2019 was comparable to the year 2017 ($93,622,496 \in$), so we can rather speak about the decline in this segment in 2018. The largest decline overall in recent period was however recorded in segment of Newspapers - from $75,410,358 \in$ in 2018 to $60,743,662 \in$ in 2019.

Advertising market in Slovakia

Media segment	2017 (EUR)	2018 (EUR)	2019 (EUR)	Total for 3 years (EUR)
Magazines	95,705,317	92,622,803	86,776,477	275,104,597
Internet	93,622,496	72,004,554	96,856,177	262,483,227
Cinema	5,252,555	4,381,392	5,204,905	14,838,852
Newspapers	76,753,984	75,410,358	60,743,662	212,908,004
Outdoor	78,934,665	78,696,015	76,720,745	234,351,425
Radio	88,422,388	91,855,095	104,326,654	284,604,137
TV	1,264,165,072	2,041,426,018	2,088,184,468	5,393,775,558
Total in EUR	1,702,856,477	2,456,396,235	2,518,813,088	6,678,255,824

Data source: Kantar

MediaGuru.cz report on Slovak advertising market based on the estimates of the largest Slovak media agency, Unimedia, concludes that the market affected by a coronavirus pandemic declined significantly in 2020.²¹ While the advertising market fell by 5.6 per cent compared to 2019, out of all media segments, online media recorded growth (some 4.6 per cent) while other media segments declined. Radios lost 9 per cent compared to 2019; Television fell by 4 per cent.

These estimates reflect loses, which were however not as dramatic as expected at the beginning of 2020. For instance, Alexei Fulmek, chairman of the board of the Association of Print and Digital Media and CEO of Petit Press in an interview for Trend in March 2020 expected that there might be a significant drop in advertising revenue, between 50 – 70 per cent. "Outages of sales and advertising will be drastic, it will be millions, if not tens of millions of Eur," said Mr. Fulmek. ²²

4. STATE ADVERTISING

There are few sources of data that can help estimate the state's advertising spending. Kantar's monitoring is focusing on several key actors, such as Government Ministries, some local municipalities and EU programmes.²³ Yet, this list does not fully reflect the real expenses, as state advertising is not clearly defined. As advertising contracts are exempt from public procurement, contracts are not awarded in an open competition.²⁴ Kantar's monitoring follows spending of state institutions, but it might miss advertising purchased by companies controlled or partially controlled by the state. There are, however, large amounts of funds spent on various EU programmes and schemes, as illustrated by the following figures (in EUR).

²¹ https://www.mediaguru.cz/clanky/2021/02/slovenskym-radiim-klesly-trzby-nejposlouchanejsi-je-expres/

²² https://medialne.trend.sk/tlac/fulmek-vypadky-predaja-inzercie-budu-drasticke-pojde-miliony

²³ Kantar monitoring of advertising expenses is based on official price lists and does not take into account bartre, bonuses and agency commissions. Kantar monitors 15 national television, 12 national and regional radio stations, more than 150 print titles with a national and regional focus, 350 web domains and subdomains, from the social networks YouTube. From the Internet, it only monitors display advertising (banner and video) from desktops.

²⁴ https://transparency.blog.sme.sk/c/523034/vlada-pred-volbami-toci-v-statnychreklamach-rekordne-peniaze.html

State advertising spending

	2017	2018	2019	Total 3 years
Ministries and offices of the Government	1,342,030	600,411	3,393,551	5,335,992
Local municipalities	16,920	88,679	81,021	186,620
EU Operational programmes, EU funds	5,379,218	20,926,303	33,566,584	59,872,105
TOTALS (EUR)	6,738,168	21,615,393	37,041,156	65,394,717

Data source: Kantar

Transparency International Slovakia (TI) looked at patterns of advertising by analysing state/public contracts concluded in the period 2011 - 2019.²⁵ Figures analysed mainly reflect the spending on advertising by governments led by political party SMER-SD (alone or in coalition with Slovenská Národná Strana and Most-Híd).²⁶

According to TI findings based on analysis of advertising contracts (higher that 5000 Euro) from the central register of contracts, the state has signed a total of 760 advertising contracts worth 107 million Euro between 2011 and 2019; three quarters of this volume were related to EU funds. TI analyses also showed that record expenditures originate in the pre-election years (2015 and 2019). In 2015, this was also related to the end of the Euro-funds programming period. For instance, government officials signed advertising contracts worth 20.8 million euros in the first 11 months of 2019.

The largest state advertisers were the lottery company TIPOS, the Ministry of Transport and the Office of the Government. Since 2011, they were behind almost half of all state advertising.

The largest recipient of state advertising among television channels was TV JOJ and its sister channels (owned by J&T), which ran advertising worth almost 39 million Eur (2011 – 2019), more than a third of the total volume of state advertising. Compared to JOJ, the most popular TV Markíza received significantly less in advertising from the state - a total of 22 million Eur, which was about 56 per cent of the volume for the JOJ group since 2011. In a third place (in the volume of state advertising) was the news television TA3 (that is known for friendly relations with representatives of former governments) with 16 million Eur, which is well above their share of the viewership market.

The radio commercial segment was dominated by Fun rádio (controlled by current speaker of Parliament and leader of government political party Sme rodina). In the monitored nine years, Fun rádio received advertising contracts from the state for 5.7 million Eur. This is more than twice as much as the most popular commercial Rádio Expres (2.4 million). Just behind Fun rádio with 5.2 million in revenue was Radio Services (affiliated with J&T). The segment of print advertising was dominated by the publishing house News and Media Holding, controlled by Penta.

Advertising from EU funds was not allocated to any smaller media known for investigative reporting or critical comments on the account of former government coalition, such as Denník N, .týždeň or postoj.sk. The state also did not contract advertising in shady (disinfo) portals.

5. FINANCIAL PERFORMANCE OF MEDIA COMPANIES

Television clearly dominates in terms of the highest revenue. Based on data provided by FinStat, in 2019, Markíza-Slovakia recorded sales of 96.7 million Euro an increase compared to previous year. Markíza-Slovakia also recorded more than 21,6 mil Euro in net profits, which is by far the highest profit among media in Slovakia in 2019 (and major jump in terms of its net profit compared to 14 mil both in 2018 and 2017).

Through the company Slovenská produkčná, TV JOJ, number two in terms of sales, earned 87.9 million euros and slightly fell compared to 2018, but overall, this amount is comparable to the sales in the previous years.

The third media house after TV Markíza and TV JOJ in terms of sales, and first among media houses publishing print titles was News and Media Holding of the Penta financial group. In 2019 its sales reached 33.6 million Eur and grew significantly by 24 per cent compared to 2018. This growth may be partly due to the fact that News and Media Holding became the successor to Život Publishing and thus completed the formal takeover of former Ringier Axel Springer magazines.²⁷

Second in terms of sales among printed media is the publisher of the daily SME, the regional press and other titles Petit Press, which reached over 24 mil Eur in sales. This amount was comparable with its sales in previous years.

The third major player in the print media segment of market (and fifth overall) was FPD Media, which more than doubled its sales compared to 2018, the reason being that FPD Media incorporated into its portfolio the most popular daily tabloid Nový Čas (along with few other popular magazines), formerly owned by Ringier Axel Springer SK, and became its successor.

The strongest purely digital player in terms of revenue was Ringier Axel Springer SK with 12.3 million euros last year. The second strongest in the digital segment was Zoznam. sk with 8.4 million sales last year. 28 Other purely digital media players are a considerable distance behind these two actors.

In the radio segment, Expres was the leader; its media representative Expres Media achieved sales of 13.9 million Eur. Express Media was followed by Radio Services with 7.5 million of sales, and Fun Media Group with 6 million Eur of sales. Among these three players, Radio Services gained the most notable sales increase compared to 2017 and 2018 (5,3 mil and 6,3 mil, respectively). Express Media and Fun Media Group had relatively stable sales amount in the two preceding years.

In terms of profits, as mentioned above, Markíza Slovakia was the leader with almost 21.7 million Eur profit in 2019. The second most profitable is the holder of a license for Rádio Expres, the company D.Expres, with a profit of 4.4 million in 2019. The third place is taken by Slovenská produkčná (JOJ Media Group). Its profit, 1.4 million, increased substantially compared to 500,000 in 2018 although the company's net profit in 2017 was over 2 mil Eur.

The following three most successful houses operate in print segment. The publisher of the Denník N - N Press - tripled its profit - from 200,000 in 2018 to almost 621,000 in 2019 (Another company from the "Group N", Denník N, a. s., added 243 thousand Eur of profit). Petit Press gained 580,000 Eur in net profit, this was however a significant drop compared to previous years. MAFRA Slovakia gained profit over 540,000.

^{25 &}lt;a href="https://volby.transparency.sk/parlament2020/2019/12/17/vlada-pred-volbami-toci-v-statnych-reklamach-rekordne-peniaze/">https://volby.transparency.sk/parlament2020/2019/12/17/vlada-pred-volbami-toci-v-statnych-reklamach-rekordne-peniaze/

²⁶ A current government coalition, composed of former opposition parties or new parties as a result of February 2020 parliamentary election was composed in March 2020.

²⁷ https://www.mediaguru.cz/clanky/2020/11/zisky-a-ztraty-slovenskych-medii-v-roce-2019/

Financial performance of companies

Total revenues (major players)	2017	2018	2019
CME - MARKÍZA SLOVAKIA s.r.o.	123 mil	125 mil	130 mil
JOJ MEDIA HOUSE (Slovenská produkčná a.s.)	106 mil	111 mil	96.4 mil
JOJ MEDIA HOUSE (MAC TV s.r.o.)	22,4 mil	24,1 mil	24,7 mil
GRAFOBAL GROUP	8 mil	5.2 mil	3 mil
FUN MEDIA GROUP a.s.	5,5 mil	5,4 mil	6 mil
RADIO SERVICES a.s.	5,4 mil	6,4 mil	7,6 mil
Roman Korbačka (EUROPA 2 a.s.)	1,7 mil	1,3 mil	0,56 mil
NEWS AND MEDIA HOLDING	27.6 mil	28 mil	34.1 mil
RINGIER AXEL SPRINGER SK a.s.	13,2 mil	1,5 mil	14,5 mil
FPD Media/Publishing house	0 mil	6,8 mil	14,4 mil
DENNÍK N, a.s.	0,1 mil	0,1 mil	0,36 mil
DENNÍK N, a.s. (N Press s.r.o.)	2 mil	2,7 mil	3,8 mil
PETIT PRESS	25,4 mil	28,8 mil	24,7 mil
MAFRA SLOVAKIA a.s.		0,74 mil	8,3 mil
PEREX a.s.	7 mil	6,7 mil	6,7 mil
ŠPORT PRESS s.r.o.	2,8 mil	2,9 mil	2,8 mil
Barecz & Conrad Media s.r.o.	1,7 mil	1,8 mil	2,4 mil
EXPRES MEDIA k.s.	12,2 mil	12,5 mil	13,2 mil
D.EXPRES k.s.	9,3 mil	9,7 mil	10,3 mil

Sales revenues (the income received by a company from its sales of goods or the provision of services or costs of goods sold)	2017	2018	2019
CME - MARKÍZA SLOVAKIA s.r.o.	85,646,810	91,112,435	96,739,287
JOJ MEDIA HOUSE (Slovenská produkčná a.s.)	84,760,095	90,193,173	87,867,156
JOJ MEDIA HOUSE (MAC TV s.r.o.)	22,371,233	24,100,189	24,701,664
GRAFOBAL GROUP	1,255,549	1,222,883	938,333
FUN MEDIA GROUP a.s.	5,473,156	5,348,911	6,007,512
RADIO SERVICES a.s.	5,326,889	6,325,436	7,529,717
Roman Korbačka (EUROPA 2 a.s.)	1,638,064	1,290,631	561,480
NEWS AND MEDIA HOLDING	27,352,965	27,220,296	33,634,588
RINGIER AXEL SPRINGER SK a.s.	11,097,046	1,307,966	12,348,567
FPD Media/Publishing house		6,345,109	14,308,075
DENNÍK N, a.s.	100,928	72,100	163,100
DENNÍK N, a.s. (N Press s.r.o.)	1,731,137	2,222,946	3,221,102
PETIT PRESS	25,016,959	25,246,541	24,122,915
MAFRA SLOVAKIA a.s.		723,358	8,184,039
PEREX a.s.	6,980,545	6,614,052	6,682,025
ŠPORT PRESS s.r.o.	2,657,027	2,803,416	2,692,239
Barecz & Conrad Media s.r.o	1,404,507	1,368,707	2,140,123
EXPRES MEDIA k.s.	12,166,786	12,509,498	13,226,186
D.EXPRES k.s.	5,544,988	5,560,425	5,543,871

Net profit/loss	2017	2018	2019
CME - MARKÍZA SLOVAKIA s.r.o.	14,458,594	14,154,515	21,651,969
JOJ MEDIA HOUSE (Slovenská produkčná a.s.	2,155,488	509,381	1,367,776
JOJ MEDIA HOUSE (MAC TV s.r.o.)	-265,248	-311,550	-165,457
GRAFOBAL GROUP	-5,234,729	-4,082,061	-10,038,406
FUN MEDIA GROUP a.s.	452,327	425,340	409,380
RADIO SERVICES a.s.	-2,997,628	-1,387,731	-813,221
Roman Korbačka (EUROPA 2 a.s.)	-56,750	-453,569	1,730
NEWS AND MEDIA HOLDING	-6,809,690	-290,393	176,631
RINGIER AXEL SPRINGER SK a.s.	-6,471,570	-521,223	-4,206,069
FPD Media/Publishing house	-34,692	-534,499	-682,515
DENNÍK N, a.s.	28,001	23,720	243,391
DENNÍK N, a.s. (N Press s.r.o.)	4,891	204,637	620,745
PETIT PRESS	829,909	3,361,118	582,724
MAFRA SLOVAKIA a.s.		-119,618	540,080
PEREX a.s.	-1,562,121	-1,375,238	-1,356,103
ŠPORT PRESS s.r.o.	-150,197	-93,049	-211,743
Barecz & Conrad Media s.r.o	-116,855	283,637	102,680
EXPRES MEDIA k.s.	4,103,392	4,345,439	4,384,252
D.EXPRES k.s.	320	267	319

Source: FinStat (finstat.sk)

6. INFLUENCE OF ONLINE AND SOCIAL MEDIA

There were 4.64 million internet users in Slovakia in January 2021 according to 2021 digital report on Slovakia by Datareportal.com.²⁹ Internet penetration in Slovakia stood at 85.0 per cent in January 2021. There were some 4 million social media users in Slovakia in January 2021, the increase in social media users in comparison with 2020 was 390 thousand users (11 per cent).

Various sources indicate that Google was the most visited site, followed by Facebook and YouTube. However, when looking at unique visits, Aktuality.sk is the leader in Slovakia, followed by Sme.sk and Zoznam.sk.; all three Slovak news portals.

Aktuality.sk is one of few media still owned by Ringier Axel Springer after it sold most of its media to various actors. The minority owner of the Aktuality.sk publisher is Slovak entrepreneur Milan Dubec, who was also the CEO of Ringier Axel Springer. Dubec also founded the important Internet portals Azet.sk and Pokec.sk. While Sme.sk is owned by Petit press (described above), the third most prominent online news portal Zoznam.sk changed an owner recently; it was sold by the telecommunications company Slovak Telekom to its CEO Martin Mác in 2020.

When looking at the popularity of the media in regards to information about domestic politics, the majority of the population in Slovakia draws information most often from TV, which was mentioned as the top-of-mind (indicated as the first) source by as many as 52 per cent of respondents in the research conducted for MEMO 98 by Focus polling agency in the second half of January 2020.³⁰ However, growing importance of online media was demonstrated in fact that the second most important source of information was online internet based media (17 per cent) followed by social media (9 per cent). While the most popular websites were the traditional and serious media (Aktuality.sk, Sme.sk etc, as mentioned above), several websites known for less serious and more dubious stories have also featured among 10 most often visited websites, although their numbers were not so significant.

Yet, there are numerous shady websites with less significant numbers of visits, but content-wise publishing blatant disinformation; list of such sites is regularly updated on Konspiratori.sk.

7. THE ROLE OF THE BROADER MEDIA ECOSYSTEM

In recent years, the Slovak Media scene has seen major ownership shifts. In contrast with past decades, when several major foreign investors were involved in private media sector in Slovakia, nowadays, the major media houses are owned by companies which have Slovak or Czech owners, usually from business sector.

The key media are more and more owned by regional business owners, who's primary interest is the fields of economics, or, in some cases, to enter politics. According to Václav Štetka, media specialist from the University of Loughborough "in most cases, it is clear that the motivation was not to make money, but in this way the owners are trying to get an instrument of influence,"³¹ Penta's partner Marek Dospiva, in an interview for the Czech Hospodářské noviny in 2015, said: "I will not walk around hot porridge. Owning the media gives us the reassurance that it will be worse for anyone to attack us irrationally. I would underline word irrationally."³²

The media market in Slovakia is relatively concentrated when it comes to main TV and Radio players as well as print media, however, a number of local TV channels and radio stations that are not networked under a major owner or a brand.³³ There is an increasing influence of the online media, but traditional media still act as agenda setters.

The above-mentioned research conducted for MEMO 98 by Focus, which revealed that TV is the most dominant source of information for 52 per cent of population, also looked at the popularity of concrete media outlets. It revealed that the most frequently mentioned TV channels included TV Markíza and public TV Jednotka, first channel of the public broadcaster RTVS. TV Markíza was mentioned by one-third of interviewed respondents (33 per cent), for whom the TV, in general, is the primary, most frequently used source of information and RTVS was selected by 28 per cent of the interviewed respondents. One in five respondents (19 per cent) mentioned another private TV - TV JOJ (MAC TV / JOJ Media House) - (19 per cent) and 12 per cent indicated news channel TA3 (C.E.N.).

Online media (web pages) represents the first most frequently used source of information about domestic politics for 17 per cent of respondents. These interviewed individuals most often get information from aktuality.sk (27 per cent) website, followed by sme.sk (10 per cent), topky.sk (9 per cent) and denníkn.sk (7 per cent).

A total of 9 per cent of respondents indicated that their primary most frequently used source of information about domestic politics are social media networks. Facebook is the dominant leader within the category of social networks, mentioned by an overwhelming majority of respondents (99 per cent). When it comes to YouTube, only 1 per cent of the interviewed mentioned this channel as the first source if information about politics.

About 8 per cent of the interviewed respondents indicated their own social environment (friends, acquaintance, colleagues etc.) as their primary source of information about domestic politics, while 7 per cent mentioned the radio. Rádio Slovensko (RTVS) was the most frequently mentioned radio station – indicated by 56 per cent of the respondents for whom radio is the primary most frequently used source of information. Other radio stations that follow include Expres (20 per cent) and Vlna (5 per cent).

Press is the primary most frequently used source of information about domestic politics for 5 per cent of the interviewed. Among the print titles, Pravda (24 per cent) is the one with the highest number of readers, followed by Nový čas (20 per cent) and SME (16 per cent).

^{30 &}lt;a href="https://memo98.sk/uploads/content_galleries/source/memo/slovak-parliamentary-elections-2020/tv-monitoring/memo-98">https://memo98.sk/uploads/content_galleries/source/memo/slovak-parliamentary-elections-2020/tv-monitoring/memo-98 prieskum-focus-prva-cast_januar2020.pdf

³¹ https://domov.sme.sk/c/20653847/odbornik-na-media-oligarchovia-v-mediach-nie-su-filantropi-ide-im-o-vplyv.html

³² https://archiv.ihned.cz/c1-63893810-chceme-medialni-stit

³³ https://www.mediaguru.cz/clanky/2019/06/prehled-trhu-regionalnich-slovenskych-medii/

