MEDIA CAPTURE MONITORING REPORT: 2025 OVERVIEW

MEASURING EMFA COMPLIANCE

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THE EUROPEAN MEDIA FREEDOM ACT: SLOW ROLLOUT, FAST CAPTURE

The International Press Institute (IPI) and the Media and Journalism Research Center (MJRC) have partnered up to produce the Media Capture Monitoring Report, an annual report series measuring media capture and the degree to which the Member States meet the new EU regulation to combat the problem.

In August 2025, the European Media Freedom Act (EMFA) came into full force and Member States are required to enact reforms to align with the new regulation.

This final overview report provides an analysis of the eight country reports for 2025 covering Bulgaria, Finland, Greece, Hungary, Romania, Slovakia and Spain. It synthesises the main trends and developments related to media capture and implementation of the EMFA in the last year on each of the four key indicators. The report also identifies key recommendations for each of the eight countries, as well as wider recommendations for EU member states for implementing EMFA provisions

The final overview report is intended a tool for journalist and media rights groups and national policy makers to guide reform and monitor the degree to which EU member states are meeting their obligations.

The Media Capture and EMFA project is a part of the Media Freedom Rapid Response (MFRR), a Europe-wide mechanism which tracks, monitors and responds to violations of press and media freedom in EU Member States and Candidate Countries. The project is co-funded by the European Commission.

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INTRODUCTION

This comparative overview forms part of the Media Capture Monitoring Report, a joint research initiative of the International Press Institute (IPI) and the Media Journalism Research Center (MJRC) launched in spring 2024 and continued in 2025. The objective is to regularly assess the application and effectiveness of the European Media Freedom Act (EMFA) in preventing or diminishing media capture in EU Member States.

The study draws on the findings of eight country reports: seven produced during the project's first year (Bulgaria, Greece, Hungary, Finland, Poland, Romania and Slovakia) and one additional report prepared in the second year (Spain). The countries were selected based on both their geographic distribution and the extent to which media capture affects their media systems. The sample includes several Central and Eastern European countries, where media capture is most acute; Greece and Spain, two Southern European countries facing similar structural pressures; and Finland, a Nordic country with a strong track record of media freedom. Finland was included primarily as a comparative case, offering insights into how EU legislation influences diverse media ecosystems.

The study is based on the conceptual framework of media capture, which was created by a team of MJRC experts and covers four key areas[1]:
1) *Independence of media regulators*
2) *Independence of public service media*
3) *Misuse of state funds to influence media output*
4) *Media pluralism and political/state influence over news media*.

These four areas provide the most effective framework for assessing levels of media capture and media plurality in highly polarised media sectors.

In light of the EMFA's strategic positioning in addressing the issues created by media capture, this project is designed to assess the extent to which EU countries are in line with and/or preparing to adopt EMFA provisions, as well as to evaluate the impact this process will have on their overall media sectors.[2]

A team of country experts were engaged to collect data and information and conducted interviews with experts to answer the following research questions:
a) *To what extent does the national legal framework in each country align with the provisions put forward by the EMFA*?
b) *To what extent is the EMFA effective in dismantling capture*?[3]

In answering these questions, the study provides a detailed analysis of the local conditions and factors that lead to media capture and how they are likely to be affected by the EMFA.

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[1] M. Dragomir (2024). The capture effect: How media capture affects journalists, markets and audiences, Central European Journal of Communication, Volume 17, number 2 (36), https://cejc.ptks.pl/Volume-17-No-2-36-Special-Issue-2024/The-Capture-Effect-How-Media-Capture-Affects-Journalists-Markets-and-Audiences

[2] M. Głowacki, M., Kuś (2022). Poland: Polarised model of media accountability. In: S. Felgler, T. Eberwein, M. Karmasin (eds.), The Global Handbook of Media Accountability. London and New York: Routledge.

[3] This has been measured in full from 2025 onwards, as the EMFA's provisions took effect in August 2025, with the exception of Article 30 of AVMSD, which is referenced by EMFA in the provisions related to regulatory authorities.

Based on this assessment, we have developed a series of recommendations to enhance media freedom within the context of EMFA implementation.

Key findings

From 8 August 2025, the EMFA became directly applicable across the EU, and national measures should have been adopted where conflicts with the regulation exist or where more detailed rules and enforcement mechanisms are required. Despite this deadline, it remains impossible to fully assess the regulation's effectiveness, as most of the eight countries examined in this study have yet to adopt the necessary compliance measures.

Finland stands out as the only case of timely and comprehensive alignment: the Act on the Supervision of Media Markets and related amendments, including the revised Act on Yleisradio, entered into force on 8 August 2025, ensuring near-complete conformity with EMFA provisions. By contrast, Slovakia adopted only partial measures, focusing on regulatory transparency, while simultaneously deepening political control over public service media through the 2024 dissolution of RTVS and creation of STVR, a move that directly contravenes EMFA Article 5 on public service media independence.

Elsewhere, progress has been markedly uneven. Romania is still in the legislative drafting phase, preparing amendments for public consultation. Bulgaria established a working group in 2024 to align national law with the EMFA, but the process has been repeatedly disrupted and no tangible results have been reported since. In Poland, despite renewed political commitments following the 2023 elections, no legislative act has been adopted; debates surrounding EMFA implementation have instead become deeply polarised amid presidential elections and disputes over media governance.

Greece introduced partial transparency reforms through Law 5212/2025, strengthening press registries and advertising rules, but leaving EMFA's core provisions on regulator independence, public service media, and some rules on state-advertising transparency largely unmet. Hungary, meanwhile, has openly opposed the EMFA, contesting its legality before the Court of Justice of the European Union and taking no domestic steps toward implementation, while maintaining extensive political control over both the media regulator, the system for state advertising and the public broadcaster.

Taken together, these developments show a highly fragmented landscape: only Finland of all countries has fully integrated EMFA standards, while others exhibit legislative inertia, selective or minimal adaptation, or outright resistance. The year 2026 therefore will represent a major test of the EU's ability to ensure that EMFA's legal guarantees translate into real, enforceable protections for media freedom and pluralism.

Since the publication of the 2025 Hungary report, the European Commission opened an infringement procedure against Hungary for failing to comply with several provisions under EMFA, including requirements relating to the public service media, the transparency of media ownership, the assessment of media market concentrations, the allocation of state advertising, and independent media regulation. This represents an important first use of the EU's new regulatory toolbox for safeguarding media freedom, independence and pluralism within the EU's internal market. The infringement proceedings will also represent a key litmus test for the strength of the EMFA moving forward and will be closely watched by other EU member states.[4]

	Independence of media regulators		Independence of public service media		Misuse of state funds to influence media output		Media pluralism and political/state influence over news media	
	Law in line with EMFA	Effective independence	Law in line with EMFA	Effective independence	Law in line with EMFA	Fair and transparent allocation	Law in line with EMFA	Effective media pluralism
Bulgaria	Yes	No	Partially	No	No	No	No	No
Finland	Yes	Yes	Yes	Yes*	Yes	Yes	Yes	Yes
Greece	Yes	No	Partially	No	Partially	No	Partially	No
Hungary	Yes	No	Yes	No	No	No	Partially	No
Poland	Yes	No	Partially	No	No	No	Partially	No
Romania	Yes	No	Partially	No	No	No	No	No
Slovakia	Partially	Partially	No	No	Partially	Partially	Partially	Yes
Spain	Yes	Partially	Partially	No	Partially	Partially	Partially	Partially

*but challenged

Notes: In Spain, draft EMFA bill announced in July 2025, approved by Council of Ministers but not yet enacted; In Greece, Law 5212/2025 covers only Articles 6 & 25 of EMFA while broader compliance draft was under public consultation at the time of writing; In Slovakia, adopted law is incomplete, some provisions conflicting with EMFA requirements; In Hungary, the Government is contesting EMFA at CJEU, hence no implementation steps were taken.
Source: Media Capture Monitoring Report (MCMR): International Press Institute (IPI) and the Media Journalism Research Center (MJRC)

4 https://www.google.com/url?q=https://ipi.media/hungary-ipi-welcomes-legal-action-against-hungary-over-eu-media-freedom-act-violations/&sa=D&source=docs&ust=1766054969970421&usg=AOvVaw285aSSZnKhNo8CoWfh35b4

Independence of media regulators: All countries have formal legal provisions for regulator independence, mostly inherited from the 2018 AVMSD. However, effective independence is largely absent. Appointment processes in Romania, Bulgaria, Hungary, Poland, and Slovakia remain vulnerable to political control. Hungary is the most extreme case, with all five members of the Media Council appointed by the ruling party and nine-year mandates designed to outlast electoral cycles. Slovakia faces an escalating risk of regulatory capture following the recent overhaul of its media regulator's composition: at least six new members have already been appointed by the current coalition, with the final three seats filled between late September and October 2025. In Poland, attempts by the new parliamentary majority to dismiss KRRiT members by rejecting annual reports have been blocked by the former President. In Romania, the CNA president is directly dependent on parliamentary battles over annual reports. Funding shortfalls and administrative attachment to ministries further undermine independence in several countries. Among the assessed countries, only Finland demonstrates both formal and practical independence.

Public Service Media: All countries assessed in the report series legally guarantee editorial and functional independence of PSM, but in practice political interference is widespread. In Slovakia, the dissolution of RTVS and creation of STVR constitutes a direct violation of EMFA Article 5. Governance and funding are fully politicised. In Hungary, PSM organisations operate as de facto state media, their journalists receive direct political instructions and extensive state resources support a pro-government narrative. Romania, Bulgaria, Greece and Poland, all face long-standing problems of politicisation, censorship, abusive management practices, or financial instability. Poland remains locked in institutional conflict following attempts to depoliticise broadcasters after 2023.

Spain formally guarantees the independence of RTVE through Law 17/2006 and has additional internal safeguards such as News Councils, but in practice the governance system remains politicised due to recurrent reforms that lower appointment thresholds and allow strong party influence over the Board of Directors. Funding is also vulnerable to political pressure, as the required multi-year Framework Mandate and Programme Contracts have not been implemented for more than a decade, leaving RTVE dependent on annual budget negotiations. Oversight by the CNMC and Parliament exists, but there is no independent mechanism dedicated to monitoring EMFA-related standards on editorial independence. Finland's Yle remains largely independent but even it faces renewed political pressure via budgetary debates.

Misuse of state funds: Overall, state advertising remains one of the most powerful and commonly used tools of media capture across Europe. Across all countries examined except Finland, with the partial exception of Spain, none have put in place cohesive rules ensuring that state advertising is allocated transparently, objectively, or proportionately, as required under Article 25 of the EMFA. Hungary represents the most extreme example: state advertising is systematically channelled to pro-government outlets, with an estimated €1.1 billion directed to aligned media between 2015 and 2023, while commercial advertisers are effectively discouraged from supporting independent publications. In Greece, Bulgaria, Romania, and Slovakia, the distribution of public funds is likewise opaque and often circumvents procurement rules, for example through the fragmentation of contracts or the use of intermediaries. Poland's new government is preparing long-overdue reforms following years of discriminatory practices, and Spain, despite having a 2005 law requiring annual reports, still lacks disclosure on distribution criteria or beneficiaries, making oversight ineffective.

Finland stands out as the only country where the misuse of state funds to influence media output is neither a current issue nor a meaningful risk, as state advertising is minimal and subsidies are limited, transparent, and objectively administered. Because public authorities spend very little on media advertising and reporting requirements already ensure transparency, Finland has not required a dedicated monitoring mechanism under Article 25 of the EMFA.

Media pluralism: Across all countries examined, no national system fully meets the standards set out in Articles 6 and 22 of the EMFA. Ownership-transparency obligations remain only partially implemented: several countries maintain registries or sector-specific databases, but none provide a horizontal, robust mechanism covering all media types, including the press, digital-only outlets, or non-audiovisual publishers. Until now, competition authorities have assessed media mergers largely through the lens of market dominance, with limited consideration for editorial independence or democratic impact. It remains to be seen whether the new EMFA rules, in force only since August, will prompt a substantive shift in practice. No country has introduced the type of cross-sector "plurality test" envisaged by Article 22. (see Recommendations in this report) This gap has left media ecosystems vulnerable to increasing concentration, with particularly acute risks visible in Bulgaria, Hungary, Greece, Romania, and Slovakia, where major conglomerates or politically connected investors, such as Hungary's KESMA foundation or Slovakia's Penta Group, dominate significant portions of the media market.

In contrast, Finland maintains strong media pluralism, supported by a diverse market structure and longstanding protections for editorial independence. Poland's pluralism also remains relatively resilient, owing largely to the size of its media market and the continued presence of strong foreign-owned media groups able to resist political pressure. Slovakia has benefited from recent investments in independent outlets, including support from the Media Development Investment Fund (MDIF) and the growth of editorially robust organisations such as Denník N, although the broader environment remains fragile and increasingly threatened by political capture.

Spain presents a more mixed picture. On one hand, its audiovisual sector has a comparatively advanced transparency framework: Law 13/2022 requires detailed disclosure by broadcasters and video-sharing platform providers, and the State Register, linked to regional registries, feeds into the European Commission's database. On the other hand, Spain still lacks a unified, cross-media ownership database and has not introduced a horizontal plurality test, meaning that press and online media remain outside the system and merger assessments do not consider pluralism or editorial independence in the way envisaged under the EMFA.

ANALYSIS

Independence of media regulators

One of the key objectives of EMFA is to ensure the autonomy of media regulators across Europe. However, the 2018 amendment of the Audiovisual Media Services Directive (AVMSD)[5] already set out the requirements for independent media regulators, including functional independence from governments, impartiality and transparency, operation without instructions, clearly defined competences and powers, an effective appeal mechanism, a proper mechanism to appoint and dismiss the head and the body of the authority, and also adequate financial and human resources and enforcement powers.

In light of the above, EMFA essentially reiterates the stipulations enshrined in Article 30 of the AVMSD, augmented with a few additional requirements related to the usual technical resources but also the authority to request information and data. Therefore, prior to the implementation of EMFA, Member States, including the ones studied here, were already required to comply with a slew of legal provisions related to ensuring the independence of media regulators.[6]

Despite the formal legal alignment with EU rules, the media regulators in most countries surveyed continue to lack effective independence. Notwithstanding the legal and functional independence enshrined in the legislation of several countries (Romania, Bulgaria, and Hungary), indications of political influence persist. While national legislation outlines the procedures for appointing and dismissing heads of national regulatory authorities and members of collegiate authorities, the lack of transparency in the appointment process or the power of the ruling party with its majority to appoint heads and members of collegiate authorities makes them vulnerable to political control.

Parliamentary oversight: In most countries, pluralistic representation is permitted. However, in Hungary, the two-thirds majority held by the ruling party in Parliament has resulted in the de facto control of both the NMHH[7], the body responsible for media and telecommunications oversight, and the Media Council, which is tasked with media monitoring and legal enforcement by the Fidesz government (in power since 2010).[8] Fidesz has appointed its own candidates to all five seats of the Media Council. Furthermore, the tenure of the head of the authority and the head of the Media Council is nine years, which is considerably longer than that of the Parliament. In advance of the 2022 elections, the Council's previous chairperson resigned early, allowing Fidesz to appoint a new head for a nine-year term and thereby further ensure their ongoing control

[5] Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities

[6] It should be noted that in Finland in addition to the Acts and Decrees mentioned in this section, the AVMSD Art. 30 also pertains to the Act on the Autonomy of Åland, whereby "For the purpose of decision-making on the measures in Finland relating to decisions made by the European Union, the legislative power and the administrative power shall be divided between Åland and the State" and "The Provincial Government has the right to be in contact with the European Commission in matters falling within the jurisdiction of Åland and involving the enforcement in Åland of decisions made within the European Union. The Provincial Government and the Finnish Government shall decide in more detail how the Finnish Government is to be informed of such contact."

[7] Website of the National Media and Infocommunications Authority. Available online: https://nmhh.hu/rolunk.

[8] Konrad Bleyer-Simon, Gábor Polyák, Ágnes Urbán: Monitoring Media Pluralism in the Digital Era. Country Report: Hungary, 2023, The Centre for Media Pluralism and Media Freedom. Available online: https://cadmus.eui.eu/bitstream/handle/1814/75725/Hungary_results_mpm_2023_cmpf.pdf?sequence=1&isAllowed=y .

Country	Desicion-making body	Appointment process
Bulgaria	Council for Electronic Media (CEM): 5 members	Parliament nominates every 2 years, President nominates every 3 years Appointed 3 by Parliament, 2 by President
Finland	Traficom	The government appoints Director General
Greece	National Council for Radio and Television (NCRTV): 9 members	Nominated by a parliamentary body (Conference of Presidents) representing all political parties in Parliament that decides with a 3/5 majority.
Hungary	Media Council: 5 members	Elected by Parliament with a 2/3 majority
Poland	National Broadcasting Council (KRRiT): 5 members	2 members appointed by Sejm (lower house), 1 by Senate, and 2 by the President
Romania	National Audiovisual Council (CNA): 11 members	Appointed by Parliament. 6 nominated by Parliament, 2 by President, 3 by Government
Slovakia	Council for Media Services (RpMS): 9 members	Parliament appoints members based on nominations from professional institutions and civil society associations
Spain	National Commission for Markets and Competition (CNMC): 10 members	Appointed by Royal Decree following a parliamentary hearing, subject to a potential veto by an absolute majority of Congress.

Source: International Press Institute (IPI) and the Media Journalism Research Center (MJRC): Media Capture Monitoring Report (MCMR)

even if they had lost the election.[9] The Prime Minister's de facto power to select the authority's chairperson gives rise to concerns that the interpretation of media laws may be subject to political control.[10]

In Slovakia, the composition of the regulator's collegiate authority initially reflected the political landscape shaped by the September 2023 general election, with several members nominated by parties that later moved into opposition. Since then, however, the current governing coalition has appointed six new members, resulting in a Council now dominated by its nominees and raising concerns about political capture, given the limited safeguards for independent appointments. A comparable, though inverse, situation can be observed in Poland. Following the 2023 elections, the former opposition parties formed the new

[9] Mission Report: Media Freedom in Hungary Ahead of 2022 Election, 2022, International Press Institute. Available online: https://ipi.media/wp-content/uploads/2022/03/HU_PressFreedomMission_Report_IPI_2022.pdf.
[10] Legal Analysis of the 2010 Hungarian Media Laws, 2011, Center for Democracy and Technology. Available online: https://cdt.org/wp-content/uploads/CDT_Legal_analysis_of_the_Hungarian_Media_Laws_020911-1.pdf.

governing coalition, yet the National Broadcasting Council (KRRiT) remains largely composed of appointees selected by the previous government. Of its five members, only one was appointed by the current authorities. These contrasting examples illustrate the same underlying structural problem: when appointment rules permit politicised influence, either by enabling rapid replacement of regulators or by entrenching legacy appointees, regulatory independence becomes vulnerable regardless of which political force stands to benefit.

In accordance with the Poland Broadcasting Act, in the event that the Sejm and Senate do not accept the KRRiT's annual report, the term of all members shall expire within 14 days.[11] However, the President of the Republic of Poland must confirm the expiration date. In 2024, the new majority in the Sejm and Senate sought to dismiss the members by refusing to accept the report. However, former President Andrzej Duda, a candidate of the former ruling party, declined to confirm the decision and maintained the Council's term.[12] In September 2025, Parliament rejected the KRRiT's annual report[13], but it is unlikely that the current Polish President, Karol Nawrocki, supported by the right-wing PiS, will act on ending the council's term.

In Romania, the President of the National Audiovisual Council (CNA) is automatically dismissed in the event that Parliament rejects the regulator's annual report. She/he remains a member of the Council and there is no legal provision that forbids their reelection as President. Nevertheless, this leaves the CNA President vulnerable to dismissal and therefore also to political influence.

In Bulgaria, the members of the regulatory authority, the Council for Electronic Media (CEM), are rarely dismissed despite criticism regarding their integrity or political leanings. The grounds for dismissal include violations of the law, established cases of conflict of interest, or failure to fulfil the duties of the role.

In Hungary, while the authority and its members are subject only to the law[14], decisions of the authority often reflect the interests of the government.[15] The authority's independence was called into question due to the absence of debate or opposing votes during decision-making, a pattern that was observed on numerous occasions.[16] In 2022 the European Commission took infringement proceedings against Hungary for the removal of Klubradio's license accusing the Media Council of acting in a 'discriminatory' manner.

Sufficient funding: The issue of funding for media regulators represents another point of contention that may impact their independence. In essence, the annual budgets of the national authorities are established in the annual national budget and subsequently

[11] Sprawozdanie i informacja o działalności w 2023 roku, https://www.gov.pl/web/krrit/sprawozdanie-i-informacja-z-dzialalnosci-w-2023-roku.
[12] Sejm odrzucił sprawozdanie KRRiT, https://oko.press/na-zywo/na-zywo-relacja/sejm-odrzucil-sprawozdanie-krrit-rada-swirskiego-na-cenzurowanym.
[13] Tomasz Wojtas, "Sprawozdanie KRRiT znów odrzucone. Wszystko w rękach prezydenta" (KRRiT's annual report rejected again. The decision now rests with the president), Wirtualnemedia.pl, 25 September 2025, https://www.wirtualnemedia.pl/sprawozdanie-krrit-znow-odrzucone-wszystko-w-rekach-prezydenta,7204176907995936a.
[14] Article 109, Act CLXXXV of 2010.
[15] The independence of media regulatory authorities in Europe, 2019, European Audiovisual Observatory. Available online: https://rm.coe.int/the-independence-of-media-regulatory-authorities-in-europe/168097e504.
[16] The independence of media regulatory authorities in Europe, cit.

adopted by Parliament. However, in some countries, experts have stated that the budgets are insufficient to ensure the effectiveness and autonomy of the authorities.

Decision-making transparency: The majority of the countries surveyed have a policy of publishing the decisions of their regulatory authorities online, with many also broadcasting the meetings of the councils. In the majority of cases, the authorities provide an annual report on their activities to the parliaments. However, there is typically no independent monitoring of the activities of the media regulators.

Appeals: All countries have an effective appeals process in place for individuals to challenge decisions made by the relevant media regulators. This is typically done through the general administrative procedures available in court. In Slovakia, there are certain instances where an appeal is not permitted, including in some cases of licence withdrawal. The number of appealed decisions varies by country. It is worth noting that Finland reported that no decisions made by the relevant authorities were appealed in the previous year.

Independence of public service media

PSM organisations are expected to play a central role in ensuring public access to diverse, pluralistic and objective news and information provided with the highest journalistic standards and always in the service of the public and not of government. It therefore also often plays a key role in upholding the fundamental right to freedom of expression and information that enables the public to engage in the democratic life of the country. Given their proximity to the state, PSM providers are particularly vulnerable to the risk of capture.

The EMFA aims to guarantee the independent operation of PSM. Article 5 outlines the measures that must be taken to ensure the independent functioning of public service media providers. These include the maintenance of editorial and functional independence, the provision of plurality of information and opinions, transparent, open, effective and non-discriminatory procedures for appointments and dismissals of members, and the allocation of adequate, sustainable and predictable financial resources to guarantee editorial independence.

Before Article 5 came into effect on 8 August 2025, many national legal systems already included provisions to address some of the requirements mentioned above. However, the rules in place have often been either inadequate or ineffective. Without adequate safeguards, there is always a risk of political interference in the editorial direction or governance of PSM. Unstable or insufficient funding can also expose them to increased political control.

The editorial and functional independence of PSM, as well as the plurality of information and opinions, are legally guaranteed in most countries studied. Despite this, political interference, or the threat of it, exists everywhere.

In Slovakia, the Slovak Television and Radio Act[17], passed in June 2024, formally guarantees the independence of the employees working with Slovak Television and Radio (Slovenská televízia a rozhlas, STVR), the country's new public broadcaster. In 2024, the government dissolved the autonomous public broadcaster RTVS and created STVR, whose governance bodies are fully controlled by the ruling parliamentary majority, with no representation of opposition parties or independent actors. Its funding is likewise dependent on political decisions, undermining institutional independence. In 2025, Slovakia adopted a law supposedly aimed to implement the EMFA. In spite of that, however, the government continued to appoint members of the STVR's governing structure on political grounds, placing Slovakia in direct violation of EMFA Article 5.

A comparable situation exists in Romania, where the legislation explicitly states that the public radio (SRR) and public television (TVR) are "autonomous", "editorially independent" institutions with a legal mandate to "ensure pluralism, free expression of ideas and opinions, and free communication of information".[18] Furthermore, the two institutions are legally obliged to "correctly inform the public". Despite these legal provisions, both institutions have faced accusations of politicisation, censorship, abusive management practices, internal corruption, and disastrous financial management.

The Bulgarian Radio and Television Act requires the independence of media service providers, including public service media, through legal provisions designed to shield the outlets against "political and economic interference". Public service media are also bound by editorial guidelines asserting journalistic independence. In reality, however, examples of political interference persist.[19]

While editorial independence is not guaranteed by law in Greece, PSM are legally required to provide a plurality of information. Nevertheless, journalistic failures in covering sensitive political issues such as the "Greek spy scandal" or the Prime Minister's violation of Covid pandemic rules suggest a damaging culture of self-censorship.

Following the 2023 election in Poland, the government prioritized relieving the public service broadcasters, Telewizja Polska (TVP) and Polish Radio (PR), of the political propagandists placed on them by the previous administration. The new opposition accused the government of breaking the law to make the changes and of imposing their own control over the broadcasters.[20] A stand-off with the former Polish President, representing the opposition parties, when he blocked the annual budget in protest against the changes, forced the government to place the PSM into a state of liquidation so that it could continue to fund the media outside of the official budget. Moreover, the newly elected President, who also has the support of the current opposition, is now challenging the government's plans to reform the public service media.

[17] Law No. 157/2024 on the Slovak Television and Radio (hereafter Slovak Television and Radio Act), latest version from 1 July 2024 available (in Slovak) here: https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2024/157/20240701.
[18] Law 41/1994 regulating the activities of the public service broadcasters.
[19] Radio and Television Act, available online (in Bulgarian) at https://lex.bg/bg/laws/ldoc/2134447616.
[20] See, for instance, V. Stetka, S. Mihelj (2024). The Illiberal Public Sphere. Media in Polarised Societies. Palgrave Macmillan.

Of all the countries studied, Hungary displays the greatest gap between the regulations and its application. The country's laws, including the Media Law and the Public Service Code, stipulate that PSM must operate independently from the state and economic actors. The Public Service Foundation was established to protect the independence of public media and the Public Service Code was adopted to set out the principles of political independence and balanced news coverage.

However, in practice, the Hungarian PSM is government-controlled. Following the 2010 election victory of the Fidesz party, over 1,600 journalists were replaced with individuals aligned with the government's views. Testimonies from current and former employees demonstrate the high level of political interference, with editorial decisions being made at the behest of government leaders[21], and journalists receiving instructions[22] directly from ministry officials.[23]

The extent of bias was clearly demonstrated during the 2022 election campaign, when the opposition's candidate for Prime Minister received only 300 seconds of legally mandated live airtime on public service television, while pro-government messaging dominated the rest of the coverage. With the same restrictive airtime rules still in force ahead of the 2026 elections in Hungary, there is a significant risk that these distortions will be repeated, which would be a breach of EMFA. Furthermore, whereas disinformation is typically the domain of fringe media in other EU countries, in Hungary, many commentators claim that it is PSM that plays a central role in disseminating such information.[24]

Appointment procedures to supervisory bodies and senior management: EMFA requires that appointment procedures are designed to guarantee the independence of PSM providers. The implementation of transparent and objective procedures for the appointment and duly justified dismissal of the head and members of the management of PSM varies across countries. However, instances of political influence have been observed in several cases.

In Romania, despite the parliamentary hearing of the members of the PSM board, there is no guarantee of the professionalism, integrity, or independence of the individuals nominated. Nominations are often made as a result of behind-the-scenes political negotiations. Furthermore, the head of the Council of Administration (as the board is known) is also appointed by Parliament based on the election of the Council members. The power of Parliament to dismiss the Council by rejecting the Council's annual report provides a strong political leverage over the Council's operations.

In Bulgaria, the Radio and Television Act delineates the procedures for appointing members and heads of the boards of PSM. While it does not explicitly mandate fully transparent, open, and non-discriminatory appointment procedures, its rules come close

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[21] "I Can't Do My Job as a Journalist," *cit*.
[22] "I Can't Do My Job as a Journalist," cit.
[23] "'Please don't report about this at all! Thanks!' – How the Hungarian state news agency censors politically unpleasant news," Direkt36, March 7, 2022. Available online: https://www.direkt36.hu/en/ne-ird-meg-semmilyen-formaban-koszi-igy-hallgatja-el-a-kormanynak-kinos-hireket-az-allami-hirugynokseg/.
[24] György Kerényi: Mi az a közszolgálat, és nálunk miért ilyen? I. rész: a kiegyensúlyozottság (What is public service and why is it like that here? Part I: the balance), Szabad Európa, November 18, 2020. Available online: https://www.szabadeuropa.hu/a/mi-az-a-kozszolgalat-es-nalunk-miert-ilyen-i-resz-a-kiegyensulyozottsag/30955365.html.

to meeting the EMFA standards. The media regulatory authority (CEM) is responsible for the appointment and dismissal of board members and the head of PSM, as well as the scheduling of public hearings of candidates. The regulator also publishes the candidate' programmes and the rules of selection. In spite of all that, however, the appointment of a new director of BNT has been repeatedly delayed since 2022 as legal disputes undermined the outcome of the competition organized by CEM. As a result, Emil Koshlukov, the incumbent director, has remained in office despite his term having expired three years ago. The selection process has not yet been concluded, as the procedure is currently tied up in court proceedings.

To prevent such deadlock situations, Spain introduced the figure of a Sole Provisional Administrator, appointed when the Chair of the RTVE Board of Directors cannot be elected due to political impasse. This interim administrator may serve for a maximum of three months.[25]

In Slovakia, although the law guarantees a fair appointment process, the governing coalition exerts significant influence over the appointment and dismissal of members due to the fact that these appointments must be confirmed by Parliament. In order to dismiss the previous heads of PSM before the end of their term, the government dissolved the RTVS legal entity and replaced it with a new body, STVR to which it was then free to appoint its favoured candidates.

In Greece, the law on "corporate governance of state companies"[26] stipulates that the Supreme Council for Civil Personnel Selection, through a competitive process involving written and oral examinations, shall propose three candidates to lead the governing bodies of state companies, including the National TV Broadcaster (ERT). Subsequently, the Deputy Prime Minister, who is responsible for the supervision of the public service broadcasters, will appoint one of the three candidates enabling him or her to exert political influence.

In Hungary, the president of the media authority, who also chairs the Media Council, nominates candidates for the most senior roles within PSM. The structure begins with the Chief Executive Officer (CEO) whose work is directly overseen by the Media Council. This provides the ruling party, through its appointees, with full control over the PSM, from the editorial level to overall management, effectively blurring the lines between state media and party propaganda.[27]

Funding: EMFA requires both transparent and objective funding procedures as well as the provision of adequate, sustainable and predictable financial resources to fulfil the public service remit. There is no perfect funding mechanism. The traditional license fee model provides greater independence and predictable funding, but it has been

[25] See more at https://www.boe.es/boe/dias/2018/06/23/pdfs/BOE-A-2018-8577.pdf.
[26] Law 4972/2022 on Corporate governance of the Public Limited Companies and the other subsidiaries of the Hellenic Holdings and Property Company [...], available online (in Greek) at https://tinyurl.com/37ssr7sr.
[27] Article 102, Act CLXXXV of 2010, cit.

increasingly disbanded due in part to problems of enforcing payment. By contrast, direct state funding, even when guaranteed by law, strengthens the opportunity for the

PSM FUNDING SOURCES IN SELECTED EUROPEAN COUNTRIES, OCTOBER 2025

Country	Funding sources	Main source of funding	Main source of funding (per capita)	Political concerns
Bulgaria	State budget, advertising revenues, commercial activities	State budget (2024): **BNT: €43.5m** **BNR: €31.5m**	€11	Potential for political pressure due to state funding
Finland	Public broadcasting tax*, commercial revenues	Public broadcast tax (2024): **YLE: €539.6m**	€96	Annual review creates political controversy
Greece	Contributory tax**, advertising revenues	Contributory tax (2023): **ERT: €208.1m**	€20	Stable source of funding claimed to ensure independence
Hungary	State budget, public contributions, commercial activities	State budget (2024): **MTVA: €348.6m**	€36	Significant increase raises questions about political neutrality
Poland	Licence fees, advertising revenues, state budget compensations	State budget (2024)***: **TVP: €294m** **Polish Radio: €33m**	€8	Blocked transfers by National Broadcasting Council, concerns about legal recognition of powers in TVP and Polish Radio
Romania	State budget, advertising revenues	State budget (2024): **TVR: €83.5m**	€4	State funding raises vulnerability to political influence
Slovakia	State budget	State budget (2024): **STVR: €131m**	€24	Funding cuts used as political tool
Spain	State budget****, hypothecated levies	State budget (2024): **RTVE: €1,070m**	€22	Government funding making the broadcaster vulnerable to political pressures

*In 2013, Yle switched from a license fee funding model, where households owning a TV set paid the same fee, to a public broadcasting tax collected outside the state budget, calculated as a percentage of their income (companies also pay it as a percentage of their taxable income); **Contributory tax is similar to a license fee, a tax imposed on all TV-owning households through the electricity bill; ***the funds were disbursed after the reform of the public service media that began in December 2023; ****including a frequency spectrum fee charged by the government on the telcos operating in the country.

Source: International Press Institute (IPI) and the Media Journalism Research Center (MJRC): Media Capture Monitoring Report (MCMR); Main Source of Funding per capita figures calculated using population data from the national statistical offices.

government to use funding as a mechanism for influence. Most PSM would benefit from a combination of different income streams including advertising, license fee and direct state funding if it comes with guarantees to protect against politicisation.

The funding of PSM is also crucial for ensuring editorial independence. Two distinct trends emerge from the study. Firstly, there are countries where the funding is insufficient for the PSM to perform its public service mandate. Secondly, there are cases, such as Hungary (and formerly Poland), where the state provides excessive budgets to enable the PSM to act as government propaganda. This also raises concerns about prohibited state aid. Both of these trends have the potential to enhance the political influence over these media outlets.

Two distinct financing models also exist. The first is a tax-funded or licence fee model, as seen in Finland[28] (and previously in Romania, Slovakia, and Hungary). The second model sees the budget directly allocated by the state, typically through legislation enacted by Parliament. Several of the country authors observed that, in order to reduce the influence of government through direct state funding, PSM should have a diverse range of funding sources.

In Slovakia, for example, the public media is wholly reliant on the state budget. So when, at the end of 2023, the new government slashed the annual budget from 0.17% of GDP to 0.12%, the finances were thrown into turmoil. While advertising revenue can potentially bridge the funding gap, it is not a universal solution and rarely sufficient to offset cuts in state funds.

Meanwhile, in Hungary, the MTVA budget has more than doubled[29] since Fidesz were first elected in 2010, raising concerns not just about political control over the public media but how its state budget creates a competitive barrier to private, independent media.[30] In 2016, Mérték Média Monitor, a Hungarian media NGO, in collaboration with Hungary's Klubrádió, and Jávor Benedek, a Hungarian Member of the European Parliament (MEP), submitted a joint complaint to the European Commission on unlawful state aid for the MTVA.[31] Three years elapsed before the Commission requested a response from the Hungarian authorities. In 2020, a number of media freedom NGOs requested that Vice President Margrethe Verstager address the issue.[32]

Following six years of assessments, in the summer of 2022, the Commission accepted the Hungarian government's argument, which falsely stated that the financing mechanism for Hungarian public media had been calculated the same way for almost three decades, based on households.

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[28] See https://finlex.fi/fi/laki/ajantasa/2012/20120484.

[29] Articles 136 and 108, Act CLXXXV of 2010, cit.

[30] Eddig nem látott összeget költünk jövőre a közmédiára (Unprecedented spending on public media next year), 24, November 28, 2023. Available online: https://24.hu/belfold/2023/11/28/kozmedia-mtva-kozpenz-koltsegvetes-2024-magyar-kozlony/

[31] 'Funding for public service media in Hungary – a form of unlawful state aid?', Mérték, 9 January 2019, https://mertek.eu/en/2019/01/09/funding-for-public-service-media-in-hungary-a-form-of-unlawful-state-aid/. For more, see State aid complaint No. 45463.

[32] 'European Commission must urgently address media market distortion in Hungary', IPI, 26 February 2021, https://ipi.media/european-commission-must-urgently-address-media-market-distortion-in-hungary/.

Independent monitoring: EMFA requires that an independent body be designated to monitor the degree to which the PSM organizations meet the requirements of political independence and financial sustainability outlined by EMFA. In most countries, the independent monitoring of information plurality, editorial independence, appointments and dismissals, and funding of public service media is essentially absent. The operation of PSM is monitored by either an affiliate or internal body of the public service media, the regulator authority, or a political body.

Misuse of state funds to influence media output

State advertising or the use of public funds represents a significant source of revenue for media outlets, particularly during periods of financial instability. However, these funds can be misused for political purposes, and so adversely impact the media market.

Article 25 of EMFA sets out detailed rules for the distribution of state advertising and service contracts to media to ensure procedures are in line with transparent, objective, proportionate and non-discriminatory criteria. The rules apply to all public authorities and state bodies and companies except local governments with a population under 100,000 inhabitants. The rules require the full public disclosure of the distribution of state advertising and the designation of an independent body to monitor and report it to the public.

This article covers an important tool for using public funds to capture media, but it is not the only mechanism through which governments can use public money to exert influence on the media and Member States should seek to address these too. None of the countries under review have specific legal provisions in place to guarantee the transparent, objective, proportionate and non-discriminatory distribution of public funds to the media.

An exception is Spain that enacted a law in 2005 on Advertising and Institutional Communications that requires the preparation of annual reports on advertising and communications earmarked by state authorities to media companies. However, the law does not establish effective mechanisms to ensure a plural, transparent, and non-discriminatory distribution of those public resources. Moreover, there is no information publicly available about distribution criteria, allocated amounts, or detailed media plans, which prevents both parliamentary and public oversight of public spending.

On the other hand, in Poland, where the previous government withdrew most state advertising from independent media, the Ministry of Culture and National Heritage has been proposing new regulations for state advertising in line with the demands of EMFA.[33]

It is standard practice for public procurement laws to apply to media advertising tenders. This is the case in Romania, Bulgaria, Slovakia and Hungary. However, such rules can

[33] Europejski Akt o Wolności Mediów. Koncepcja wdrożenia do polskiego porządku medialnego, 2024, https://www.gov.pl/web/kultura/zalozenia-do-ustawy-medialnej

rules can often be circumvented, for example, by issuing several small contracts each of which come just below the threshold for making a public tender, or by contracting media agencies as intermediaries to distribute advertising funds.

State advertising can be used to generate both positive stories and also eliminate critical stories such as corruption scandals. Sometimes, the funded content is not labeled as advertising, but instead published as editorial content to mislead the readers. These practices have been cited in Romania and Bulgaria, where such contracts are often considered confidential and are not available to the public. In response to revelations of the misuse in particular of EU communication funds to spend on favoured media, as well as criticism in the European Commission's Rule of Law reports[34], Bulgaria adopted modest changes in the Public Procurement Act in October 2023 to include state advertising.

During the Covid-19 pandemic many countries used public funds, or health campaigns to both inform the public and to help prop up the media industry that faced a brutal advertising and distribution crisis. These funds, such as in Greece and Poland, excluded critical media leading to greater market distortion and a longer term dependency of media on public funds.

In Hungary, the state has taken the use and misuse of public funds, whether through state advertising, political advertising or other economic tools designed to benefit its media allies, to another level. The state is the dominant player in the advertising market, with state advertising at times accounting for over 30% of the total ad market. Furthermore, the government can leverage tax incentives, strategic partnerships, and regulatory oversight to influence the actions of businesses, including commercial advertisers, to align with its interests. This has prompted many commercial advertisers to avoid independent media, further eroding their financial viability.

The Central European Press and Media Foundation (KESMA), a group of pro-government media outlets, has been a substantial beneficiary of the system.[35] These outlets receive up to 75-80% of their total revenue from state advertising[36], helping to shield them from the economic challenges faced by other media organisations.[37]

In 2019, Mérték Média Monitor, Klubrádió, and MEP Jávor Benedek submitted a formal complaint to the European Commission detailing how Hungarian authorities had unlawfully used state resources to support a number of pro-government media outlets through political campaigns. They complained that the government had violated state aid

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[34] See more at https://commission.europa.eu/publications/2023-rule-law-report-communication-and-country-chapters_en.

[35] Analysis: One year after election, media freedom in Hungary remains suffocated, International Press Institute, April 5, 2023. Available online: https://ipi.media/analysis-one-year-after-election-media-freedom-in-hungary-remains-suffocated/.

[36] Attila Bátorfy: Hungary: A Country on the Path towards an Authoritarian Media System, in: Angelos Giannakopoulos (ed.): Media, Freedom of Speech, and Democracy in the EU and Beyond, The S. Daniel Abraham Center for International and Regional Studies, June 2019. Available online: https://dacenter.tau.ac.il/sites/abraham.tau.ac.il/files/Media,%20Freedom%20of%20Speech%20Text_0.pdf.

[37] Anna Wójcik: How the EU Can Defend Media Freedom and Pluralism in Hungary and Poland, German Marshall Fund, November 2, 2022. Available online: https://www.gmfus.org/news/how-eu-can-defend-media-freedom-and-pluralism-hungary-and-poland.

rules and undermined media pluralism.[38] The Commission dismissed the complaint, stating that state advertising expenditure does not constitute an “advantage” as defined by Article 107 of the TFEU.

In the spring of 2025, two Hungarian media companies lodged a new competition complaint with the European Commission, alleging that the government distorts the media market through its allocation of state advertising funds. Documents accompanying the complaint indicate a clear correlation between a publication’s pro-government stance and the amount of state advertising it receives, with an estimated €1.1 billion (over HUF 440 billion) directed to pro-government newspapers, television channels, and news sites between 2015 and 2023.[39]

A key test of EMFA will be if it provides sufficient legal basis for the European Commission to intervene effectively on the basis of similar complaints in future. One area of political funding that EMFA is not designed to deal with is the growth of online political campaigning whether through government channels that promote the ruling party, or through political party channels.

In Hungary, a considerable proportion of social media campaigns and public service announcements are aligned with the political interests of the ruling party and used extensively to disseminate government narratives.[40] In 2022, the government allocated HUF 19.6 billion (€48 million) to social media campaigns, and HUF 16.6 billion (€40.6 million) to advertising in government-aligned media outlets.[41]

The European Commission’s regulation on the transparency and targeting of political advertising that also came into force in October 2025, requires all political advertising to be clearly labelled, but it will not be able to intervene to stop partisan political advertising disguised as government public information campaigns. Meanwhile the regulation itself is facing mounting criticism as platforms, including Google and Meta, chose to stop receiving political advertising rather than follow the new transparency rules.[42]

Article 25 of EMFA on the allocation of public funds for state advertising and supply or service contracts is an extremely important article that, if properly implemented, can help prevent the abuse of the use of state advertising funds. As Member States bring their legislation into line, media stakeholders should be asking for stronger measures that can also control the misuse of political advertising by the government.

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[38] European Commission must urgently address media market distortion in Hungary, IPI, cit.

[39] Zsolt Sarkadi: Panaszt tett a reklámnak álcázott állami támogatások miatt két magyar médiacég az Európai Bizottságnál (Two Hungarian media companies have lodged a complaint with the European Commission over state subsidies disguised as advertising.), Telex, April 28, 2025. Available online: https://telex.hu/gazdasag/2025/04/28/magyar-hang-eu-versenyjogi-eljaras-kormanymedia-hirdetesek

[40] A Megafon mögé bújva uralja a Fidesz a közösségi médiát (Hiding behind Megafon, Fidesz dominates social media), Political Capital, February 29, 2024. Available online: https://politicalcapital.hu/hireink.php?article_read=1&article_id=3338.

[41] Csaba Segesvári: Tavaly 16,6 milliárd forint közpénz vándorolt a kormánymédiához társadalmi célú reklámként (Last year, HUF 16.6 billion of public money went to government media for social advertising), Átlátszó, February 28, 2022. Available online: https://atlatszo.hu/kozadat/2023/02/28/tavaly-166-milliard-forint-kozpenz-vandorolt-a-kormanymediahoz-tarsadalmi-celu-reklamkent/.

[42] Ellen O’Regan and Eliza Gkritsi: Backlash as new EU political ad rules kick in, Politico, October 10, 2025. Available online: https://www.politico.eu/article/eu-political-ad-rules-google-meta-microsoft-big-tech-kick-in/.

Media pluralism and political/state influence over news media

Two EMFA articles deal with oversight of media ownership. Article 6 imposes a set of standards on transparency of ownership requiring media service providers to declare their direct and indirect owners, stakes held by public authorities, income from state advertising, including from third countries[43], the beneficial owners as well as any actual, or potential, conflict of interest that may affect the provision of news or current affairs. It furthermore requires member states to designate an authority to monitor ownership and ensure the information is placed on a publicly accessible database.

Article 6 also requires all owners to respect the editorial independence of news rooms by guaranteeing that editorial decisions are taken freely within the established editorial line.

Article 22 on the assessment of media market concentrations, primarily sets in law the requirement that an assessment of any change of media ownership that increases market concentration should also consider the impact on media pluralism and editorial independence. Moreover, the assessment must involve the designated authority responsible for assessing media pluralism and editorial independence. EMFA outlines a number of principles to be taken into account, including that the procedures should be transparent, objective, proportionate and non-discriminatory, but it stops short of imposing a particular methodology. It does say, however, that the European Commission, aided by the European Board for Media Services, will issue guidelines for the assessments.

EMFA applies these rules to 'media service providers', a new umbrella term which includes not only audiovisual media service providers as defined in AVMSD but also press publishers.

Media ownership transparency, Article 6: Many of the studied countries already have established transparency criteria. However, none of them publish all the information required by EMFA. Some regulatory authorities or ministries maintain databases, but none fully comply with the EMFA's Article 6.

In Romania, legal entities holding an audiovisual licence are required to provide the national regulator, the CNA, with full details of their ownership structure. Hungary's legislation requires the regulatory authority, NMHH, to maintain a comprehensive registry of various media services including simple and on-demand audiovisual and radio services, supplementary media services, printed press products, online press products, and news portals.[44] However, the registry does not contain information about ownership or beneficial ownership. Despite this, the public is often aware of the beneficial owners behind a particular outlet due to the rigorous scrutiny from journalists and researchers.[45]

[43] Meaning from non-EU member states.
[44] Article 41, Act CLXXXV of 2010, cit.
[45] Monitoring Media Pluralism in the Digital Era (2023), cit.

Transparency requirements related to media service providers in line with EMFA in selected EU countries, October 2025

	Legal name(s) and contact informatio n	Name(s) of their direct or indirect owner(s) able to exercise influence on the operation or strategic decision making	Ownershi p by state or a public authority	Total annual amount of public funds for state advertisin g allocated	Total amount of advertisin g revenues received from third-country public authoritie s or entities	Name of beneficial owner(s)	Publicly available database of owners
Bulgaria	Yes*	Yes*	Yes	No	No	Yes**	Yes***
Finland	Yes*	Yes*	No	No	No	No	No
Greece	Yes	Yes	Yes	No	No	Yes	Yes*
Hungarya	Yes*	No	No	No	No	No	No**
Poland	Yes	Yes*	Yes**	No	No	Yes***	No
Romania	Yes*	Yes*	No	No	No	Yes**	No
Slovakia	Yes	Yes	No**	No	No	No	No
Spain	Yes*	Yes*	Yes	No	No	No**	Yes*

Notes:

Bulgaria: *However, many media service providers, including online sites, do not comply with the requirements to provide a legal name, contact information, and information about their owners on their websites. **Moreover, it is not uncommon for authorities to neglect their responsibility to oversee whether media publications are providing the required data about beneficial owners; **In the case of print media, a database of owners is registered at the Ministry of Culture; in the case of audiovisual service providers, at the Council for Electronic Media (CEM).

Finland: *Only in the Trade Register of the Patent and Registration Office.

Greece: *Online and print media are to be covered by a database created through the Law 5005/2022. NCRTV is in charge of maintaining a television and radio outlets database.
Hungary: *Only applicable for audiovisual media service providers; **The NMHH is required to maintain a registry of media services made available in Hungary, including audiovisual service suppliers and publishers. However, the law does not explicitly require the NMHH to create a national media ownership database.

Poland: *Only applicable for audiovisual media service providers (i.e., broadcasters, VoD providers); **Applicable only when disclosing the owner, not specifically required to declare public entity ownership; ***Applicable for audiovisual media service providers with KRRiT in charge of maintaining a database. Central Register of Beneficial Owners data has to be published by media service providers on their websites.

Romania: *Only applicable for audiovisual media service providers. The name of the direct or indirect owner(s) able to exercise influence on the operation or strategic decision making required for the shareholders owning more than 10% in audiovisual media service providers; **Although it is not mandated by law to do so, the National Audiovisual Council (CNA) publishes a comprehensive list of all licensed broadcasters on its website, including all relevant ownership data.

Slovakia: *Applicable for shareholders owning more than 10% in audiovisual media providers and 20% in publishing companies; **All reactions between state and the media are recorded in the state registry of partners of the public sector, but no legal provisions requiring such information to be publicly available exists.

Spain: *Law 13/2022 (LGCA) and RD 444/2024 impose transparency obligations (identity, contact details, editorial managers, significant shareholdings, state participation) and a public State Register for audiovisual and video-sharing service providers, now extended to “users of particular relevance”; however, this framework is sectoral and does not cover the press or non-audiovisual digital media; **Beneficial ownership data are recorded in the Central Register of Beneficial Ownership (RCTR), accessible only to authorities, obliged entities, and persons with a legitimate interest; there is no general obligation for media outlets to publish beneficial owners on their websites, nor a unified media-specific database integrating ownership and funding flows, so Spain only partially meets EMFA Article 6 standards.

Source: International Press Institute (IPI) and the Media Journalism Research Center (MJRC): Media Capture Monitoring Report (MCMR)

Media ownership transparency, Article 6: Many of the studied countries already have established transparency criteria. However, none of them publish all the information required by EMFA. Some regulatory authorities or ministries maintain databases, but none fully comply with the EMFA’s Article 6.

In Romania, legal entities holding an audiovisual licence are required to provide the national regulator, the CNA, with full details of their ownership structure. Hungary’s legislation requires the regulatory authority, NMHH, to maintain a comprehensive registry of various media services including simple and on-demand audiovisual and radio services, supplementary media services, printed press products, online press products, and news portals.[44] However, the registry does not contain information about ownership or beneficial ownership. Despite this, the public is often aware of the beneficial owners behind a particular outlet due to the rigorous scrutiny from journalists and researchers.[45]

In Bulgaria, the regulatory authority, the CEM, maintains a register of ownership

[44] Article 41, Act CLXXXV of 2010, cit.
[45] Monitoring Media Pluralism in the Digital Era (2023), cit.

information for broadcasters. In Slovakia, only an internal database of the Media Services Council contains the list of licensed audiovisual media providers.[46] A database was under construction at the time of writing. In Greece, broadcasters are required to report their ownership status to the National Council for Radio and Television (NCRTV). TV and radio providers and newspaper publishers are obliged to make public their beneficial owners. They provide their legal name and contact information in a readily accessible format, typically online or in print for newspapers. Spain has a database of broadcasting companies owners, which, however, does not cover print press or internet portals.

Media pluralism assessments, Article 22: Media pluralism is essential for ensuring public access to a range of different sources of news and opinions without which free democratic debate cannot take place. Over the past two decades Europe has witnessed a rapid concentration of the media market leading to news deserts for local media and a high concentration of ownership of national media into the hands of a handful of corporations.

In Central and Eastern Europe in particular, the withdrawal of foreign publishers following the economic crisis saw them replaced by national business leaders who had made their fortunes in other industries, such as energy, transport, or finance, often dependent on public contracts with the state. As this raises the risk of increased conflicts of interests between those that provide the news and governments overseeing public contracts, one key tool for countering the threat to quality journalism is to ensure that media pluralism and editorial independence are vigorously defended.

While economic criteria for market concentration, including abuse of a dominant position, are relatively straightforward to monitor, addressing media pluralism and editorial independence, as required by the EMFA, is significantly more challenging.

Every country has a competition authority tasked with overseeing market concentration; however, not all of them have specific media industry regulations tailored to scrutinize media market concentrations or to protect media pluralism in particular. Where such regulations do exist, they differ considerably from one country to another, and none fully conform to the stipulations set forth in Article 22 of the EMFA.

Each nation in our study has established legal caps on media ownership or mechanisms to curb dominant positions, measured through metrics such as audience share (e.g., in Romania) or advertising market share (e.g., in Slovakia). They also enforce corrective measures to address excessive market power which, when unheeded, can escalate into severe repercussions, including the revocation of broadcast licenses.

However, all surveyed countries fall short of implementing robust legal frameworks that directly protect media pluralism and uphold editorial independence. This legislative gap has, in no small part, paved the way for widespread media capture. A variety of acquisitions and consolidations, illustrated in our country reports, indicate a troubling

[46] See https://rpms.sk/sites/default/files/2024-04/Vyrocna_sprava_za_rok_2023_1.pdf

pattern where media ownership ends up in the clutch of a few powerful entities. These may be sprawling conglomerates with stakes in industries beyond media (such as Dimosiografikos Organismos Lampraki in Greece), corporations with strong ties to ruling governments like Mediaworks in Hungary, or companies whose managers are under scrutiny for corruption, such as the Penta Group in Slovakia.

Perhaps the most blatant case of centralized media ownership is exemplified by Hungary's KESMA foundation, created in 2018. This foundation consolidated a total of 476 pro-government media outlets under a unified control structure. Declaring the transaction as a matter of national strategic importance, Hungary's government effectively shielded the move from investigation by competition and media regulatory authorities.

While many of these deals do not technically fall foul of antitrust laws or existing ownership constraints, their intertwining with political powers and influential business elites casts a long shadow over press freedom and journalistic independence within the outlets in question. Cases like these not only stifle diverse viewpoints but also pull independent journalism into deep waters.

Conclusions and recommendations

Although the EMFA entered into force in August 2025, it seems likely that, in the absence of clear and detailed provisions, many countries will seek to circumvent the spirit of EMFA by merely complying with the formal requirements without introducing effective implementation mechanisms. In this context, greater transparency and independent monitoring, involving civil society and representatives of media stakeholders, could help to reduce the incidence of political interference. All the recommendations issued in last year's assessment therefore remain fully relevant, as the structural risks they identified have not been addressed and continue to shape the implementation environment.

What are the most urgent reforms needed to comply with EMFA

Across the countries assessed, the most urgent reforms needed to comply with the EMFA converge around a limited set of structural weaknesses: politicised governance of public service media, insufficient independence of media regulators, and opaque or distortive systems of state financing of media outlets. While national contexts differ, the findings point to a shared pattern in which formal legal protections often exist but are undermined by weak implementation, political capture, or lack of institutional capacity.

A central priority emerging from the recommendations is the need to depoliticise decision-making bodies, both regulatory authorities and public service media boards, through transparent, merit-based appointment processes and stronger guarantees of financial autonomy. Equally critical is the regulation of state resources flowing into the media sector, particularly state advertising and politically funded content, which remain key levers of influence in several countries.

Finally, compliance with the EMFA will require not only legislative adjustments but also sustained investment in institutional capacity and transparency. Adequately resourced regulators, effective participation in European-level coordination mechanisms, and full disclosure of media ownership and funding structures are essential if the EMFA is to function as a meaningful protection against media capture rather than a purely formal legal framework.

Bulgaria

Bulgaria's most urgent priority is to guarantee the independent functioning of public service media and the national media regulator. In parallel, transparent, objective, and non-discriminatory criteria must be established for the distribution of state funds to media outlets, including state advertising.

Finland

In Finland, the most pressing reform is to adequately resource the competent authority, Traficom, enabling it to actively participate in the European Board for Media Services and to conduct or commission the thorough assessments required under the EMFA.

Greece

Greece urgently needs stronger legal provisions to guarantee the financial and political independence of the media regulator, alongside enhanced protection mechanisms to protect the political and editorial independence of public service media. In addition, greater transparency is required regarding media ownership concentration, including full disclosure of all forms of beneficial ownership in the news media sector.

Hungary

Hungary's most urgent reform is to secure the independence of the media regulator in practice by overhauling the selection and appointment process. This should be complemented by comprehensive legislation ensuring that state advertising is allocated according to transparent, objective, proportionate, and non-discriminatory criteria.

Poland

In Poland, the most pressing challenge is resolving the problematic legal status of public service media, where political independence remains fragile and undermines impartial service delivery and social cohesion. There is also an urgent need to restore impartial, expert-based decision-making within the National Broadcasting Council.

Romania

Romania urgently needs stricter regulation of political party funding of media outlets, particularly where such funding is used for propaganda purposes. Full transparency should be ensured, and all content financed by political parties must be clearly labelled as such

Slovakia

In Slovakia, the priority reform is to guarantee the independence of the public service broadcaster. This requires restructuring the STVR Board, which is currently dominated by ruling parties, and establishing a credible mechanism to ensure the broadcaster's financial autonomy.

Spain

In Spain, the most urgent reform is the introduction of clear, merit-based eligibility criteria and a stricter system of incompatibilities for appointments to RTVE's Board of Directors. Candidates should demonstrate relevant professional qualifications, and institutional guarantees should be strengthened to protect board members from political influence, thereby reducing politicisation and reinforcing the broadcaster's independence.

Independent media regulators

Conclusion

Notwithstanding the legal stipulations pertaining to autonomy enshrined in Article 30 of the Audiovisual Media Services Directive (AVMSD), it is evident that the majority of parliamentary bodies or the ruling political party exert a considerable and irrefutable influence on the operational dynamics of the regulatory authorities. This influence is frequently leveraged to gain political advantage.

The European Commission should encourage, and Member States should consider, going beyond the minimum legal requirements outlined in EU law and introducing mechanisms and processes that help ensure the autonomy and effectiveness of the media regulators.

Recommendations

- Introduce strong guarantees of political independence of board members by ensuring no political affiliation and providing a thorough vetting of any potential conflicts of interest that might compromise a candidate's independence.
- Distribute the nominations across different political institutions such as the lower and upper houses and the presidency.
- Enable nominations from civil society groups and representatives of media stakeholders.
- Require candidates to have the highest professional qualifications and experience to be able to perform the tasks effectively.
- Introduce staggered rotating terms for the members of the regulatory authorities, differing from the terms of the parliament.
- Introduce mechanisms to ensure voice of opposition parties in the nomination process for example by requiring any parliamentary vote on nominations to have a supermajority of, for example, 60% or more, or by reserving places to be nominated by the smaller parties.
- Require regulators to take decisions as a board with major decisions on licensing and penalties, also requiring a supermajority.

Independent public service media

Conclusion

The same principles behind the recommendations identified for the establishment of independent media regulators should apply to the establishment of independent governing bodies for public media in order to ensure that members are free of political influence and conflicts of interest, are demonstrably equipped to fulfil the role and are committed to serving the values of public service media.

Recommendations

There is no perfect funding model, funding that is independent of arbitrary political decisions, through a form of licence fee or tax on electronic goods, provides greater guarantees of independence and predictability than funding provided directly by the state. Most authors recommend PSM to be able to raise funds through a combination of different sources. Whichever the system they must provide budgets that are adequate, sustainable and predictable, as well as independent of political influence.

It is also recommended that independent monitoring mechanisms be established to oversee the performance of the public service media and the work of their governing bodies to ensure they meet their public service mandate.

Urgent Recommendation on Hungary. In view of the upcoming 2026 election, the Hungarian authorities should immediately revise the broadcasting law to ensure that opposition parties are provided equal coverage by the public media. Failure to do so would be a clear breach of EMFA and undermine the fairness of the election.

Misuse of state funds to influence media output

Conclusion

In the case of state advertising or other forms of state funded allocations, although there are numerous potential methods for circumventing legal requirements, the implementation of effective guidelines and best practices can help to minimize the risks.

Recommendations

EMFA requires full transparency of distribution of state advertising funds and this obligation applies to both media as the recipients as well as to the state institutions disbursing the funds.

To strengthen this it is recommended
- To ensure that the rules apply to all levels of government, including local governments regardless of the size of population.
- That the transparency rules apply to all intermediaries involved in the disbursement of

state funds, including advertising agencies and media sales houses.

- That the monitoring encompasses all forms of funding, including subscriptions purchased by state bodies.
- Cumulative spending should be included as a criterion for the selection of media companies with a threshold beyond which no further funds can be distributed without a tender process.
- Media service providers should be obliged to clearly label all state funded advertisements (and other content).
- The institution designated to monitor the distribution of state advertising should be sufficiently empowered to obtain the necessary information to ensure state bodies are fully compliant in their transparency obligations.
- Media stakeholders and civil society should be consulted on the development of the guidelines for distribution and the methodology for their application, as well as in monitoring and assessing the application of the rules.

In addition, to fully reveal the financial connections between the state and media, governments should provide full transparency on all public tender contracts that are awarded to companies that fall in the same business grouping as national media service providers.

Media pluralism and political/state influence over news media

Conclusion

Given the lack of specificity in the provisions of EMFA, addressing media pluralism and editorial independence represents a significant challenge. The need for further guidance is evident to establish a consistent and practical methodology and to guard against attempts to identify and exploit loopholes.

Recommendations

The European Commission, assisted by the European Board for Media Services, is required to develop guidance on a consistent and practical methodology for assessing media pluralism and identifying the necessary safeguards to protect media pluralism such as ownership thresholds and guarantees of editorial independence.

Representatives of media stakeholders should be closely consulted on building the methodology for assessing media pluralism and in reviewing the application of its rules.

The national experts have already indicated that, among other things, the methodology should include:

- cross-ownership limits extended to beneficial owners as well as the official companies that own media assets.
- a concept of dominant position that aligns with the realities of the national media market.

A set of disqualification criteria designed to prevent companies that receive significant public procurement funding from simultaneously owning media assets (or vice versa) should also be introduced.

Ensuring EMFA implementation across Member States

As Member States seek to bring legislation into line with EMFA in the near future, a strong, Europe-wide mechanism for ensuring compliance must be developed.

This series of reports will be repeated and updated on an annual basis to both monitor compliance and identify where Member States should go further to fully confront media capture.

The reports will also serve to identify individual breaches of EMFA that Member States, the European Board for Media Services and the European Commission can act upon.
The success of EMFA will depend on the political will of the European Union to take on Member States who seek to fulfil the letter of EMFA while in practice, subverting its spirit.

While EMFA advances strong principles of media freedom and clearly identifies many of the most urgent threats from media capture, its ability to address the problems will depend on more than just the legal obligations it imposes. Politicians, media stakeholders and civil society must work together in Member States to use the EMFA as the foundation stone for building a political culture that embraces the principles of media independence, pluralism and quality.

MEDIA CAPTURE MONITORING REPORT: 2025 OVERVIEW

DECEMBER 2025

This report by IPI is part of the Media Freedom Rapid Response (MFRR), which tracks, monitors and responds to violations of press and media freedom in EU Member States and Candidate Countries. This project provides legal and practical support, public advocacy and information to protect journalists and media workers.

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