

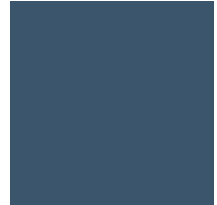


European University Institute



CMPF
Centre for Media Pluralism and Media Freedom

ROBERT SCHUMAN CENTRE FOR ADVANCED STUDIES



Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2017 in the European Union, FYROM, Serbia & Turkey

Country Report: Bulgaria

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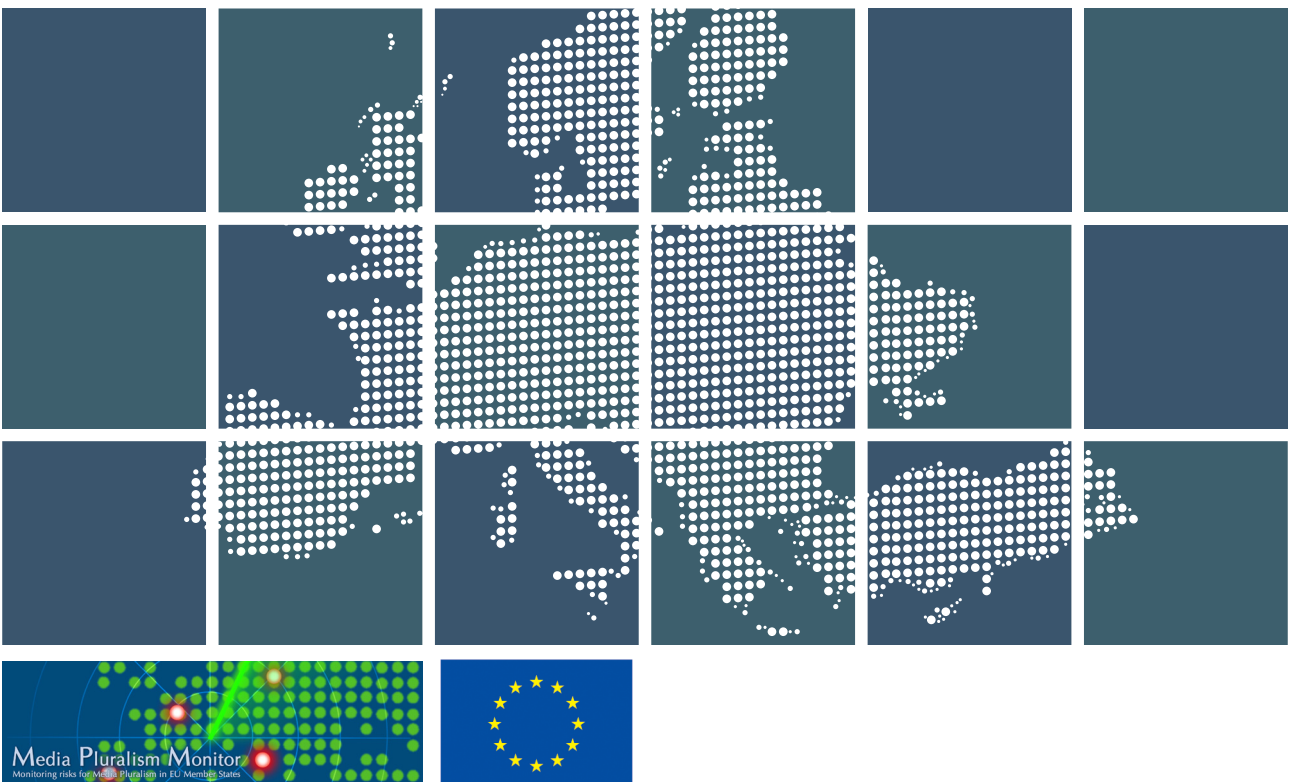




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1. ABOUT THE PROJECT

1.1 OVERVIEW OF THE PROJECT

The Media Pluralism Monitor (MPM) is a research tool that was designed to identify potential risks to media pluralism in the Member States of the European Union. This narrative report has been produced within the framework of the second EU-wide implementation of the MPM, carried out in 2017. The implementation was conducted in 28 EU Member States, Serbia, Former Yugoslav Republic of Macedonia (FYRoM) and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2 METHODOLOGICAL NOTE

The CMPF cooperated with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the cases of Malta and Italy where data collection was carried out centrally by the CMPF team. The research is based on a standardised questionnaire and apposite guidelines that were developed by the CMPF. The data collection was carried out between June and December 2017.

In Bulgaria, the CMPF partnered with Foundation Media Democracy, who conducted the data collection and annotated the variables in the questionnaire and interviewed relevant experts. The scores assessing the risks for media pluralism were provided by the CMPF and calculated according to the algorithm developed by the Centre itself. The national report was reviewed by CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts).

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Figure 1 below).

Basic Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political control over media outlets	Access to media for minorities
Protection of right to information	Media ownership concentration (horizontal)	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Cross-media concentration of ownership and competition enforcement	Media and democratic electoral process	Access to media for people with disabilities
Independence and effectiveness of the media authority	Commercial & owner influence over editorial content	State regulation of resources and support to media sector	Access to media for women
Universal reach of traditional media and access to the Internet	Media viability	Independence of PSM governance and funding	Media literacy

The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk. On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk. For more information on MPM methodology, see the CMPF report “Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2016 in EU-28, Montenegro and Turkey”, <http://cadmus.eui.eu/handle/1814/46786>

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, the MPM2017 scores may not be fully comparable with MPM2016 ones. For more details, see the CMPF report on MPM2017, soon available on <http://cmpf.eui.eu/media-pluralism-monitor/>



2. INTRODUCTION

The total population of Bulgaria is 7 101 859 (December 2016).¹ According to the latest census (2011), the Bulgarian ethnic group is the largest with 84.8% of the Bulgarian population. The Turkish ethnic group is the second largest and making up 8.8%. The Romany group is the third and accounts for 4.9%. The adult literacy rate reaches 98.4%.² Bulgarian is the mother tongue for 85.2% of the population, Turkish being the second with 9.1% and Roma with 4.2%.³

The economic situation is relatively stable, but at very low level. In 2016, as in previous years, Bulgaria was the member state with the lowest per-capita GDP, at 51%, below the EU average.⁴ Bulgaria has remained the poorest country in the EU, although unemployment rates are 6.1% (December 2017), below the average for EU-28 (7.3%).⁵ The economy faces many serious problems, including, amongst others, corruption. Corruption perceptions score ranks 71 of 180 countries (2017).⁶

In April 2017, the powerful centre-right GERB party, which won the March 26 parliamentary elections, signed a coalition agreement to govern the country with United Patriots, an alliance of three nationalist parties (VMRO-BND, NFSB and Ataka). The participation of extreme nationalist parties in the government is a source of permanent instability. The opposition is weak and unconsolidated. The political process is characterised by numerous scandals and verbal attacks. Against this background, many media (online media, tabloid newspapers, party TVs, social networks) have contributed to the escalation of polarization in society by frequent use of hate speech and extreme views close to racism and xenophobia.

The media market is diverse but still highly dependent on political and economic influences. The total number of newspapers in 2016 was 262 (44 dailies).⁷ There are 121 registered TV operators. The radio operators are 84.8 The total TV and radio revenues are respectively 214 357 000 and 35 170 000 EUR, which is indicative of a general decrease in the total revenues in both sectors.⁹ According to other data, the investments in advertising in 2016 are 750 000 000 EUR on a gross basis, which is an increase of 7% compared to 2015, along with a growth of the gross advertising budgets in four sectors: Internet (plus 18.1% in 2016 compared to the previous year), outdoor advertising (plus 5.8%), radio (plus 2%) and television (plus 14-18%). The gross advertising budgets in print media have significantly declined (minus 35% in 2016 compared to 2015).¹⁰

In 2017, 67.3% of the households had access to the internet at home (a growth of 3.8%, compared to the previous year). The relative share of households using broadband internet connection was 66.9% (99.4% of those having access to the internet).¹¹

The 2017 World Press Freedom Index of Reporters without Borders places Bulgaria at the 109th position (compared to 113th position in 2016) among 180 monitored countries (last place in the EU).¹² In the Freedom of the Press ranking of Freedom House, in 2016, Bulgaria occupies the 78th position – out of 195 countries and territories.¹³ Freedom House defines Bulgarian press freedom status as ‘partly free’. The 2017 Media Sustainability Index by IREX indicates, in 2016, there was a rise in crimes against journalists, including violent attacks.¹⁴ The Mapping Media Freedom Index reports 13 cases of threats and pressure, including physical attacks, addressed at Bulgarian journalists (from May 2016

1 See: <http://www.nsi.bg/en/content/6704/population-districts-municipalities-place-residence-and-sex> (accessed: 29 January 2018).

2 See: http://uis.unesco.org/sites/default/files/documents/adult-and-youth-literacy-national-regional-and-global-trends-1985-2015-en_0.pdf (accessed: 30 January 2018).

3 See: <http://www.nsi.bg/sites/default/files/files/pressreleases/Census2011final.pdf> (accessed: 29 January 2018).

4 See: http://ec.europa.eu/eurostat/statistics-explained/index.php/GDP_per_capita_consumption_per_capita_and_price_level_indices (accessed: 1 February 2018).

5 See: http://ec.europa.eu/eurostat/statistics-explained/index.php/File:Unemployment_rates_seasonally_adjusted_December_2017_%25_F2.png (accessed: 8 February 2018).

6 See: <https://www.transparency.org/country/BGR> (accessed: 1 February 2018).

7 See: <http://www.nsi.bg/en/content/4577/issued-newspapers-periodicity> (accessed: 29 January 2018).

8 See: <http://www.nsi.bg/en/content/4631/tv-operators> (accessed: 29 January 2018) and <http://www.nsi.bg/en/content/4621/radio-operators> (accessed: 29 January 2018).

9 See: <http://www.nsi.bg/en/content/4635/revenue-and-expenditure-tv-operators> (accessed: 29 January 2018) and <http://www.nsi.bg/en/content/4625/revenue-and-expenditure-radio-operators> (accessed: 29 January 2018).

10 See: https://www.capital.bg/biznes/media_i_reklama/2017/06/19/2992040_brutniat_reklamen_pazar_prez_2016_g_e_15_mlrd_leva_no/ (accessed: 2 February 2018).

11 See: <http://www.nsi.bg/en/content/6099/households-who-have-internet-access-home> and http://www.nsi.bg/sites/default/files/files/pressreleases/ICT_hh2017_en_ZW9AP4W.pdf (accessed: 29 January 2018).

12 See: <https://rsf.org/en/ranking> (accessed: 19 February 2018).

13 See: https://freedomhouse.org/sites/default/files/FH_FT0P_2016Report_Final_04232016.pdf (accessed: 12 February 2018).

14 See: <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2017-bulgaria.pdf> (accessed: 17 January 2018).



to October 2017).¹⁵ A number of Bulgarian non-governmental organizations (Association of European Journalists – Bulgaria, Foundation Media Democracy, etc.) point out a wide range of ongoing negative trends: interventions by media owners, advertisers, state authorities and politicians in the work of the media, spread of self-censorship, deteriorating working conditions for media professionals, etc.

3. RESULTS FROM THE DATA COLLECTION: ASSESSMENT OF THE RISKS TO MEDIA PLURALISM

In Bulgaria, high risks for media pluralism were detected primarily in the areas of Social Inclusiveness (74%) and Market Plurality (71%). Three indicators in the Social Inclusiveness area point to high risk: Media literacy (92%), Access to media for women (79%) and Access to media for local/regional communities and for community media (75%). Three of the Market Plurality indicators point toward a particularly high risk: Media ownership concentration (horizontal) (96%), Commercial and owners' influence over editorial content (92%) and Cross media concentration of ownership and competition enforcement (88%).

There are also significant risks to media pluralism in Bulgaria identified within the Political Independence area. Three indicators within this domain face a particularly high risk: State regulation of resources and support to media sector (97%), Political independence of media (75%) and Independence of PSM governance and funding (67%).

The area of Basic Protection scores low to medium risk. The main problems here are identified within the indicators Universal reach of traditional media and access to the Internet (63%) and Protection of right to information (50%).

To sum up the results of the study, the four major barriers to media pluralism in Bulgaria refer to allocation of state advertising, concentration of ownership, interference in editorial content and the state of media literacy.

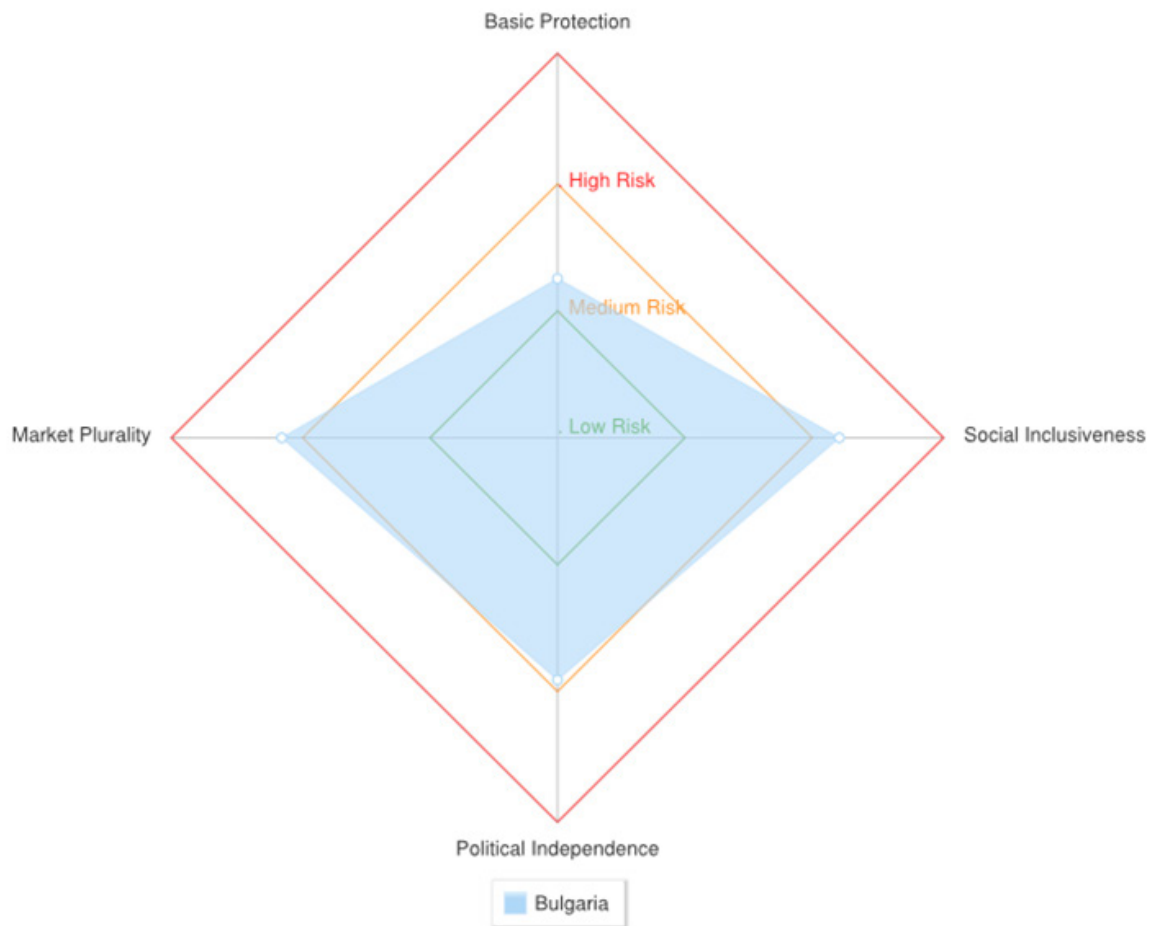
Two indicators are clearly outlined as scoring low risk: Media and democratic electoral process (13%) and Independence and effectiveness of the media authority (20%). Positive results in these areas are mostly due to available policies and legal provisions.

As a whole, as in previous years, the mixed performance of Bulgaria mainly refers to the fact that while in most cases the legal framework introduces necessary standards, they are frequently not effectively implemented in practice. Even within indicators with lower risk there are often discrepancies between legal provisions and implementation (for example regarding the transparency of media ownership). These peculiarities must be taken into account when making an overall assessment of media pluralism in Bulgaria. At the same time it should be pointed out that there have been some new developments in the media sector which happened after the 2017 MPM data collection was completed (new regulation proposals, transformations of the ownership of media outlets, etc.). Worryingly, some recent tensions and disturbing tendencies have affected the public service Bulgarian National Television (BNT), involving programme management representatives (controversies with journalists over editorial guidelines, gaffes related to quality of content, etc). Such ongoing developments influence the state of media pluralism in the country and have the potential to rapidly change the whole picture, which remains unstable.

¹⁵ See: <https://mappingmediafreedom.org/#/> (accessed: 31 October 2017).

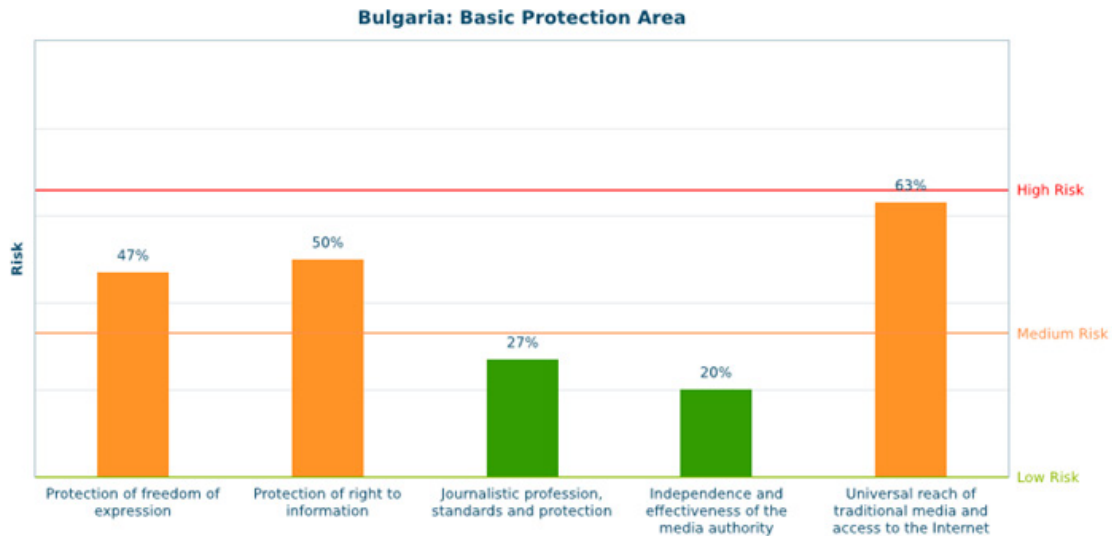


Bulgaria: Media Pluralism Risk Areas



3.1 BASIC PROTECTION (41% - MEDIUM)

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



In 2017, Bulgaria scores overall medium risk in the area of Basic Protection.

Although there are established constitutional and other legal guarantees with regard to freedom of expression, the relevant indicator scores medium risk (47%). There is an expansion of the risk level compared to MPM2016 which is largely due to persistent practices of violations of freedom of speech, especially in terms of freedom of the media and of journalists. A wide range of local and international monitoring organizations have repeatedly paid attention to the negative effects of corporate and political pressure over the media, along with an overall weakness of the rule of law, resulting in extensive self-censorship. ISPs generally refrain from filtering, blocking or removing online content in an arbitrary way. Nevertheless freedom of expression online is sometimes jeopardized. There have been cases of individuals convicted of insult or being interrogated by state authorities over critical publications against public figures on Facebook.

Protection of the right to information is at medium risk (50%). There are adequate legal provisions in this regard but problems with the implementation of the law persist. There are ongoing practices of institutions responding with silence to access to information requests. Media professionals have been continuously facing obstacles when accessing public information files mostly due to technical barriers (not user-friendly formatting and not easy to find on websites). In addition, there is no specialized regulatory framework in place to protect whistleblowers.

The indicator on journalistic profession, standards and protection scores an overall risk of 27%. Favourable factors for low risk level include: open access to the journalistic profession; legal provisions for the protection of journalistic sources; lack of arbitrary arrests or imprisonments of journalists; no cases of killings of journalists. Against this background, however, there are some serious problems leading to medium or high risk in other aspects of the indicator. The self-organization of media employees faces huge challenges as a result of widespread distrust in professional associations. Trade union protection is commonly inadequate (practically non-existent in private media) and working conditions for journalists have generally deteriorated over the past few years. Media outlets are regularly offering journalist contracts for services instead of full-time employment contracts. Working hours are often unregulated, along with little or no social benefits and general salaries around or below the average salaries of employees (in general) in the respective regions and districts. Although some associations promote good media practices, in general they are not particularly effective in guaranteeing editorial independence and respect for professional standards. It is worth mentioning though, that in October 2017, the Association of European Journalists – Bulgaria, as well as the Union of Bulgarian Journalists, initiated professional support (public statements, protest) against the interference of political figures in the work of the media. These initiatives were provoked by the unprecedented threats and pressure exerted in a live broadcast by Deputy Prime Minister and a MP of the majority party against Nova TV talk show host Viktor Nikolaev. Attacks and threats both to the physical and the digital safety of journalists continue to take place.



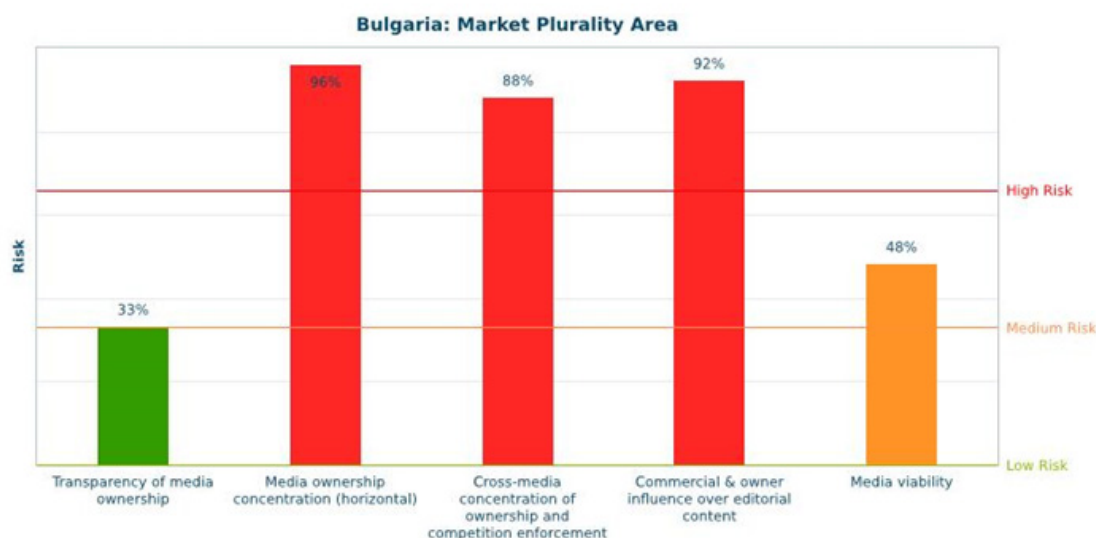
Online harassment is among the main forms of external pressure over media professionals. Critical and investigative journalists are the most vulnerable.

The independence and effectiveness of the media authority scores low risk (20%). The specialized body which regulates media services in Bulgaria is the Council for Electronic Media (CEM). The Radio and Television Act provides explicit safeguards for CEM's independence from political or commercial interference. The tasks and responsibilities of the media authority are clearly defined in the law and the regulatory body is generally transparent about its activities. At the same time, however, appointment procedures do not fully guarantee political independence in practice. Two of the CEM members are appointed by the President and the other three are elected by the Parliament, with no provisions for genuine citizen participation in the process. Latest appointments of CEM members as well as the 2017 election of a new Director General of the BNT by the media authority have been criticized for being politically motivated. In 2017, the image of the regulatory body was undermined by a CEM member threatening reporter Kudrinka Kudrinova during a public discussion over a question asked by the journalist.

Reach of traditional media and access to the Internet is at medium risk (63%) as a result of insufficient PSM coverage (<98%), the level of broadband penetration (<78%) and high concentration among the ISPs (73% market share of the leading four companies).

3.2 MARKET PLURALITY (71% - HIGH RISK)

The Market Plurality indicators examine the existence and effectiveness of the implementation of transparency and disclosure provisions with regard to media ownership. In addition, they assess the existence and effectiveness of regulatory safeguards to prevent horizontal and cross-media concentration of ownership and the role of competition enforcement and State aid control in protecting media pluralism. Moreover, they seek to evaluate the viability of the media market under examination as well as whether and if so, to what extent commercial forces, including media owners and advertisers, influence editorial decision-making.



As in 2016, in 2017 Bulgaria again scores high risk in the Market Plurality domain. Problems related to media ownership concentration, both horizontal (96% risk) and cross-media (88%), as well as to commercial and owner influence over editorial content (92%) remain solid, with no perspectives for sustainable solutions.

The indicator on transparency of media ownership scores low risk (33%, close to medium risk) only because of the existence of formal legal provisions for disclosure of media ownership. These provisions, however, are partial, do not cover equally all media sectors and do not fully guarantee disclosure of ownership details directly to the public. Not all publishers of newspapers, for example, comply with the legal requirements to declare the ultimate owner of the company under the obligations set by the Mandatory Deposition of Press and Other Works Act. Even though envisaged by law, sanctions for not complying with the transparency obligations have never been imposed on media outlets. In addition, tracking ultimate media ownership in some cases is simply not possible because ownership identification leads to a company registered in an offshore area. Although there are three media ownership registers and a general Commercial register, the ultimate owners of some influential media outlets remain unclear.

The level of horizontal concentration of media ownership indicates extremely high risk, with no improvements compared to MPM2016. Media legislation still does not contain specific thresholds in order to prevent a high degree of horizontal concentration of ownership. This refers to all media sectors. General rules in the competition law do not include specific provisions for the media market in particular. At the same time the actual level of concentration is impossible to track due to a deficit of precise data, which is considered as a risk itself. Full data on total revenues (including advertising, sales, subscriptions, etc.) generated in the different media sectors are not available. Accessible information on market shares is based only on partial advertising revenue data. Based on such incomplete information, the Top 4 concentration calculations show a high level of concentration in the audiovisual sector – 92%, and around 63% concentration in the newspaper sector. There are no data regarding the radio sector. Available figures on Top 4 audience shares are also indicative of high concentration: 74% in the television sector and 82% in the radio sector. Total audience reach of the major 4 owners in the newspaper market is around 36%.

No changes have been recorded in the high-risk indicator on cross-media concentration of ownership and competition enforcement. Media legislation does not provide for specific thresholds based on objective criteria in order to prevent a high degree of concentration. Data insufficiency in terms of media ownership and market shares does not allow making an accurate evaluation of the actual cross-media concentration in the national market. This is an element that increases the risk, based on the MPM methodology. The Commission for the Protection of Competition, the relevant regulatory authority, does not take into account, implicitly or explicitly, considerations about media pluralism when applying competition rules to the media sector. There are still no regulatory safeguards ensuring that state funds granted to PSM do not cause disproportionate effects on competition.

Continuing influence over editorial content by media owners and other commercial entities leads to a steadily high level of risk. Systematic practices of owner and corporate pressure over editorial independence have been re-confirmed in a number of 2017 studies and reports by monitoring organizations.¹⁶ The lack of legal and self-regulatory instruments ensuring editorial independence additionally contributes to the high risk score: no mechanisms granting social protection to journalists in case of changes of ownership or editorial line; no regulatory safeguards ensuring that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests; no measures stipulating that the exercise of the journalistic profession is incompatible with activities in the field of advertising. Although advertorials are prohibited by law, i.e. use of editorial content to promote a product where a trader has paid for the promotion without making that clear, such content is common.

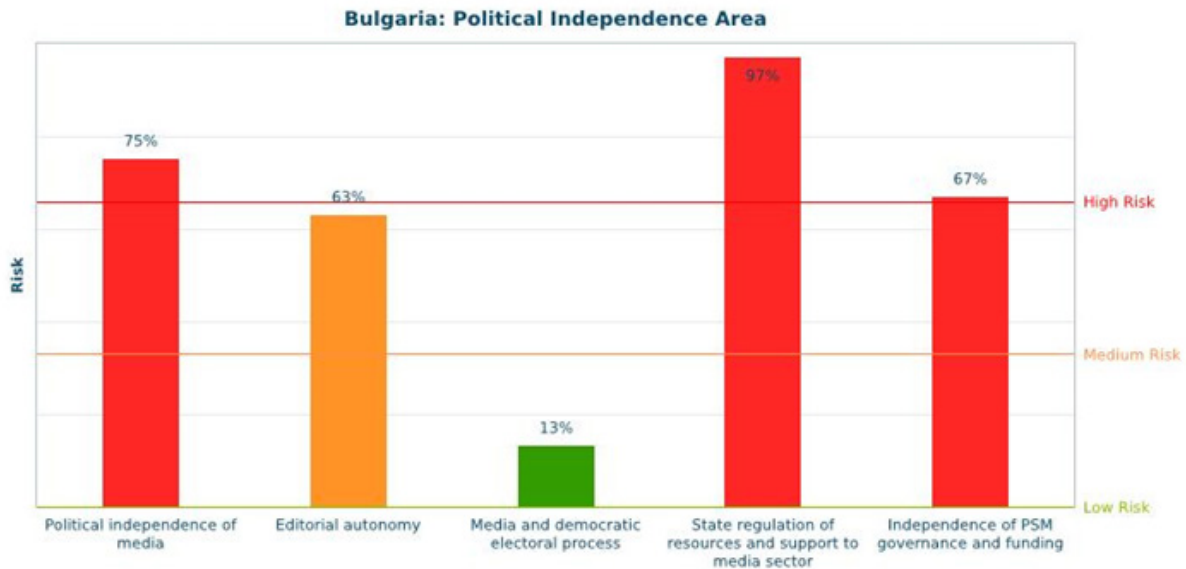
The indicator on media viability scores medium risk (48%). Over the past two years, unlike the increase in GDP per capita, revenues in the audiovisual and radio sectors as well as gross advertising budgets in the press have decreased. Expenditure for online advertising has increased, almost 60% of the online advertising revenues in the country being accumulated by Facebook and Google. Although some media are developing alternative sources of revenue (organization of paid events, applying for grants on a project basis, crowdfunding), such practices are survival measures rather than viable business models. Paywalls are practically not popular.

16 See <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2017-bulgaria.pdf> (accessed: 20 October 2017); <http://www.aej-bulgaria.org/eng/p.php?post=2628&c=146> (accessed: 30 January 2018); <http://www.aej-bulgaria.org/en/wp-content/uploads/2018/01/The-Great-Comeback-of-Political-Pressure-2017.pdf> (accessed: 12 February 2018).



3.3 POLITICAL INDEPENDENCE (63% - MEDIUM RISK)

The Political Independence indicators assess the existence and effectiveness of regulatory safeguards against political bias and control over the media outlets, news agencies and distribution networks. They are also concerned with the existence and effectiveness of self-regulation in ensuring editorial independence. Moreover, they seek to evaluate the influence of the State (and, more generally, of political power) over the functioning of the media market and the independence of public service media.



The Political Independence area covers all levels of risk resulting in an overall medium risk.

Least problematic is the Media and democratic electoral process indicator (low risk of 13%). Existing legal provisions and self-regulatory instruments aiming at political pluralism on PSM are generally respected. Legal obligations on the BNT and the Bulgarian National Radio (BNR) during electoral campaigns have even been criticized for being too restrictive and focused on formal objectivity and pluralism procedures, thus in practice hindering editorial coverage of campaigns. The leading private television channels usually offer fair and balanced representation of political viewpoints in periods of election. Party-affiliated channels, however, clearly favour some political actors over others. Media coverage of electoral campaigns on television and radio channels consists of both free and paid-for forms, financial assistance (so called ‘media packages’) being provided by the state to small political parties and independent candidates (under the Election Code, except for parties which are entitled to a state subsidy under the Political Parties Act).

Editorial autonomy is overall at medium risk (63%), with no significant changes compared to the MPM2016 evaluations. There are no regulatory safeguards to guarantee autonomy when appointing and dismissing editors-in-chief. Interference concerning appointments and dismissals in practice is difficult to prove. At the same time, however, there are party television channels where politicians act as TV hosts. In general, political influence over editorial content in the news media remains systematic and persistent as registered by studies in 2017. Political control through advertising funds distributed by the government and local municipalities continues to take place. The trend is especially worrying with regard to the majority of regional news outlets (traditional and online) which sign media servicing contracts with local municipalities leading to self-censorship and mostly positive coverage of the local authorities.

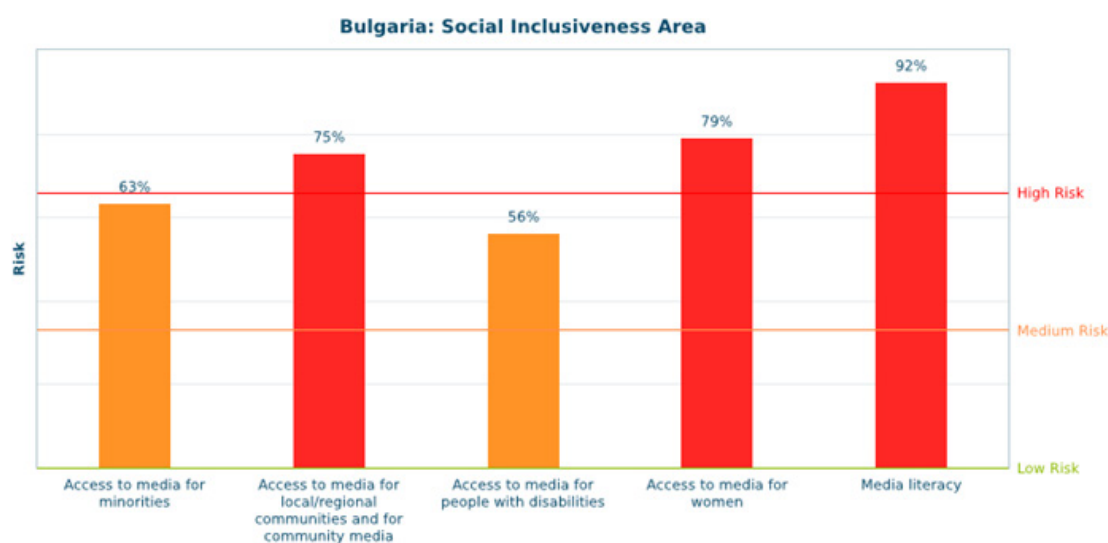
The other three indicators within the area point to high risks. Political independence in terms of existence and implementation of regulatory safeguards against control of media by government and politicians scores a risk of 75%. There are no specific provisions regulating conflict of interests between owners of media and political parties, partisan groups or politicians. Neither are there any specific legal limitations to direct and indirect control of media, news agencies or media distribution networks by politically affiliated persons and organisations. In practice political parties and politicians—such as Deputy Prime Minister Valeri Simeonov, MP Delyan Peevski, government coalition party Ataka—do own media outlets. Both national and local media are subject to systematic political control in practice. The scope of interference varies among media sectors, the highest risks being identified in the press.

For the second year in a row state regulation of resources and support to the media sector reaches the highest possible level of risk (97%). There are no direct or indirect state subsidies to media other than PSM. However, there is state advertising, but without regulatory safeguards for its fair and transparent allocation to media outlets that would prevent from preferential treatment or misconduct. Distribution of state advertising in practice is not based on clear and transparent criteria. Studies and monitoring reports have pointed out such negative effects of actual state advertising practices as: soft censorship and self-censorship; manipulation of editorial content; media market deformation; use of EU funds for buying media compliance and paying for smear campaigns against political opponents.¹⁷

The risk with regard to the independence of PSM governance and funding has increased since the MPM2016 data collection, reaching now 67%. Worsening is mostly due to amendments in the Radio and Television Act allowing for indefinite extension of the regular 3-year mandates of the Directors General and the Management Boards of the PSM in cases when the term of office is over, and a new Director General is not elected by the CEM. These amendments have in fact legalized a more than a year long delay in the appointment of a new Director General of the BNT. Such manoeuvres have been severely criticized by a number of analysts for actually providing additional opportunities for political bargaining and interference in the election of the Director General. Funding of the PSM remains problematic. The main source of financing is the state budget subsidy decided by the government on an annual basis, based on a 'per hour of programming' principle without public discussion and in disregard of ongoing claims by PSM management and professionals that budgets are insufficient and should be based on the remit of PSM.

3.4 SOCIAL INCLUSIVENESS (73% - HIGH RISK)

The Social Inclusiveness indicators are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country's media literacy environment, as well as the digital skills of the overall population.



An increase in the overall risk within the Social Inclusiveness area makes it the most risky domain diagnosed in the 2017 MPM study for Bulgaria. All indicators are marked by stagnation or deepening of negative tendencies.

Access to media for minorities is at medium risk (63%). As a whole, there is not a clear principle of proportionality between the access to airtime and the size of the minority population. It is the public-service BNT and BNR which provide relatively most adequate coverage of minority-related issues and airtime to minority representatives, albeit with some significant deficiencies and lack of special media policy. The only regular programs dedicated to minorities in general are broadcast by the 'Hristo Botev' cultural channel of the BNR. The only available national news in minority language is a daily afternoon news bulletin in Turkish language on the BNT. Leading private TV channels provide frequent coverage of Roma-related issues in prime-time news and talk-show programmes. Representation, however, is often scandalous and re-enforcing negative prejudices. Access of other minorities to airtime is too scarce.

¹⁷ See http://www.wan-ifra.org/sites/default/files/field_article_file/SC%20Bulgaria%20final%202016%20%282%29.pdf (accessed: 30 May 2017); <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2017-bulgaria.pdf> (accessed: 20 October 2017); <http://www.aej-bulgaria.org/eng/p.php?post=2628&c=146> (accessed: 30 January 2018); [http://www.europarl.europa.eu/RegData/etudes/STUD/2016/571376/IPOL_STU\(2016\)571376_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2016/571376/IPOL_STU(2016)571376_EN.pdf) (accessed: 20 October 2017).



An additional problem is the rise of hate speech on the media, victims being mostly Roma people and migrants.

The level of risk regarding the access to media for local/regional communities remains high (75%). Although regional and local media in general are financially unstable, they are not supported by authorities through direct or indirect subsidies. In fact, studies illustrate that instead of developing such measures, local authorities rather try to get advantage of the overall weakness of regional media by offering state advertising for positive coverage in return. Community media are neither envisaged in law, nor do they exist.

Access to media for people with disabilities indicates medium risk (60%). Policy making in this regard is still underdeveloped and fragmented. Although media service providers are encouraged by law to develop accessible content for people with disabilities and the CEM regularly reminds the electronic media of their obligations, no significant progress has been reported. Leading private TV channels still do not offer access to news and current affairs content to people with disabilities. People with visual impairments are not provided with audio description or audio subtitling by any media. Limited audiovisual content adapted for people with hearing impairments is scarce, provided only by the BNT.

In 2017, the indicator on the access to media for women reaches a high risk of 79% which may seem paradoxical given the common feminisation of journalism in Bulgaria. The share of women among news reporters is more than 80%. On the other side, however, the share of women as subjects and sources in news is only 35%. In addition, the appointment of the current Directors General of the BNT and the BNR has led to an overall decrease in the share of women on PSM management boards (40%). The shares of women among executive directors and members of management boards of the leading private TV companies are indicative of low female participation at the highest management level. Another reason for the high risk scored by the indicator is the lack of gender equality policy adopted by the PSM, although in practice female staff prevails and there are broadly formulated requirements for anti-discriminatory programming content.

Media literacy (92%, high risk) is among the most troublesome issues in terms of media pluralism in the country. There is no relevant policy or national strategy. Media literacy is absent from compulsory primary and high school education curriculum. School teaching on this matter is scarce and is based on individual initiatives and projects. Teachers are not provided with any official training in media literacy. As far as there are any activities, they are on a project-by-project basis implemented mainly by non-governmental organisations. The efforts of NGOs are fragmented and occasional due to lack of sustainable funding.

4. CONCLUSIONS

As in the MPM2016, the results of the MPM2017 indicate significant risks to media pluralism in Bulgaria. There is a noticeable increase in the risk in three of the four areas: Basic Protection (35% in 2016, 41% in 2017), Social Inclusiveness (64% in 2016, 74% in 2017) and Political Independence (56% in 2016, 63% in 2017). There is no shift in the risk level of the Market Pluralism area which again scores a high risk of 71%. The trends clearly point towards a deterioration in the overall risk to media pluralism in the country.

The highest individual levels of risks are identified in the indicators on allocation of state advertising, concentration of ownership, interference in editorial content and the state of media literacy.

Against this background, reducing the risks to media pluralism in Bulgaria is a matter of urgency. Due to the persistent nature of the problems diagnosed in the current report, most of the recommendations remain the same as those proposed in the MPM2016.

In the Basic Protection area, fostering positive developments requires policy measures such as:

- Promotion of campaigns for better professional protection and working conditions of journalists (by NGOs, professional organizations, media stakeholders).
- Protection of the right to information through more effective implementation of the Access to Public Information Act by state institutions.
- Improvement of legislation on the composition, independence and effectiveness of the Council for Electronic Media, the national media authority, by providing with civil society representatives in the nomination of CEM members, in the composition of the body and in the monitoring of CEM's decisions and accountability. Such improvements should be in tune with the forthcoming amendments to the AVMS Directive.

In the area of Market Plurality:

- Fostering implementation of media ownership transparency measures by the relevant regulatory authorities.
- Introduction of a 'Media Plurality' test in cases of media mergers (in the law and in the competencies of the regulatory authorities).
- Constant and sustainable monitoring of advertisers' and media owners' influence over editorial content – to be conducted by NGOs in order to help prevent commercial interference.

In the area of Political Independence:

- Reassessment of the Radio and Television Act regarding PSM independence, funding and management, including measures that would guarantee broader citizen involvement in the evaluation of provided services and in the decision-making on significant program changes.
- Introduction of transparent and non-discriminatory regulation of governmental distribution of state advertising and public funds to the media, along with regular accountability by state agencies and recipients of funding as well as periodical monitoring (by NGOs) of the effectiveness of measures.
- A more strict enforcement of the Election Code's provisions on distinguishing paid from editorial content in political coverage.

In the Social Inclusiveness area:

- Development of public policy on media literacy, and the introduction of the media literacy subject in school curriculum and in non-formal media education.
- Launching a special channel devoted to culture, with a solid focus on minority, gender and social issues, within the public-service BNT network – in order to improve the representation of diverse Bulgarian minorities and social groups.
- Increasing the access to media content for people with disabilities, along with carrying out consultations with end users and providing adequate information on access services (by both PSM and private media, with the support of relevant state agencies).
- Introduction of policy measures to support regional and local media with regard to their financial sustainability, distribution, political and economic independence (by the government, local authorities, NGOs).

Finally, as in previous implementations of the MPM, there is a paramount need for reliable and accessible media market data (market shares of owners in all media sectors, circulation and distribution figures, data on online media consumption and concentration, etc.). Such data could be provided by transparent and unbiased state, private or non-governmental institutions in order to guarantee most precise monitoring and evaluation of media pluralism in the country.



ANNEXE 1. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2017 CT Leader (please indicate with X)
Orlin	Spasov	Executive Director/ Assoc. Professor	Foundation Media Democracy / Sofia University "St. Kliment Ohridski"	X
Nelly	Ognyanova	Professor	Sofia University "St. Kliment Ohridski"	
Nikoleta	Daskalova	Researcher	Foundation Media Democracy	

ANNEXE 2. GROUP OF EXPERTS

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

First name	Last name	Position	Institution
Anna	Goranova	Executive Director	Association of Bulgarian Broadcasters - ABBRO
Borislav	Shabanski	Chief Secretary	Council for Electronic Media
Ivo	Draganov	Professor	New Bulgarian University
Maria	Cheresheva	Vice President	Association of European Journalists – Bulgaria
Petranka	Fileva	Professor	Sofia University "St. Kliment Ohridski"
Vesela	Vatseva	Executive Director	Bulgarian Association of Regional Media



