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MEDIA CAPTURE MONITORING REPORT: GREECE

**MEASURING COMPLIANCE
WITH THE EUROPEAN
MEDIA FREEDOM ACT**

NOVEMBER 2024

MEDIA CAPTURE MONITORING REPORT: GREECE

The International Press Institute and the Media and Journalism Research Center have partnered up to produce the Media Capture Monitoring Report, an annual report to measure media capture in Europe and the degree to which Member States meet new EU regulation to combat the problem.

In May 2024 the European Media Freedom Act (EMFA) came into force and Member States are required to enact reforms to align with the new regulation.

The reports focus on the EMFA elements directly addressing media capture, namely, the independence of public service media and of media regulators, the misuse of state funds to influence media, and ensuring ownership transparency and media pluralism.

The reports examine the standards prescribed by law and how they are currently implemented in practice. They set out the areas of reform needed to bring each country into line with EMFA while also making recommendations for where reform can go further.

The reports are an important tool for media rights groups and national policy makers to guide reform and monitor the degree to which Member States are meeting their obligations.

For the first year a group of seven EU Member States have been selected for the pilot studies including Bulgaria, Finland, Greece, Hungary, Romania, Poland and Slovakia.

The project is a part of the Media Freedom Rapid Response, 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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Independence of media regulators

The Greek media sector has been adversely affected for decades by an unregulated licensing system that has concentrated significant political influence in the hands of a few media conglomerates. Previous attempts to regulate the media environment were made, with the most significant occurring in 2015, when media moguls were required to pay for TV licences. The National Council for Radio and Television (NCRTV) was repeatedly found to be susceptible to political influence. Despite the Council's status as an independent authority, its members are selected by a parliamentary committee where the ruling party holds a majority. This makes the selection of NCRTV members susceptible to political influence. Furthermore, the Council's limited financial resources and understaffing present significant challenges for its members and management in carrying out their duties and achieving their objectives.

- Legislation in line with EMFA provisions: **Yes**
- Effective independence: **No**

Independence of public service media

In Greece, public media outlets have historically faced significant challenges due to political and economic pressures. Since its inception, the Hellenic Broadcasting Corporation (ERT) has been subject to varying degrees of government control. Despite efforts to professionalise and depoliticise the broadcaster, ERT has persistently lacked the requisite editorial and institutional independence, due to an absence of adequate safeguards to protect it from political influence. Some managers and news directors have been more controlling than others, but the issue of government interference in ERT's operations has persisted. Another ongoing challenge is the routine replacement of state media executives following changes in government. The same can be said of the Greek public news agency, the Athens-Macedonian News Agency (ANA-MPA). Both media outlets have been subject to instances of censorship and repeated breaches of the journalistic principle of pluralism.

- Legislation in line with EMFA provisions: **Partially**
- Effective independence: **No**

Misuse of state funds to influence media output

The financial dependence of media outlets on state support makes them susceptible to external influence or self-censorship. In Greece, state advertising is inadequately regulated, with the result that it frequently functions as an indirect subsidy in exchange for favourable government coverage. This was evident during a scandal that occurred during the pandemic, which ultimately resulted in positive reforms. A significant amount of funding is distributed through various subsidies. However, the scale and criteria used to allocate state funding are not transparent,

limiting public awareness.

- Legislation in line with EMFA provisions: **Partially**
- Fair and transparent allocation of state funds to media: **No**

Media pluralism and political/state influence over news media

The ownership of private media by vested interests represents the most acute form of media capture in Greece. The high concentration of legacy media ownership in the hands of wealthy families and shipowners with various political ties, particularly to the New Democracy party, has significantly shaped a media landscape where, despite the abundance of media outlets, effective pluralism that provides a wide plurality of information sources and views remains weak. Following the financial crisis, some traditional media groups ceased trading, and new owners, namely oligarchs, entered the market. The lack of effective media regulation in previous decades, coupled with a partial absence of beneficial media ownership, has contributed to the phenomenon of media capture.

- Legislation in line with EMFA provisions: **Partially**
- Effective media pluralism: **No**

INDEPENDENCE OF MEDIA REGULATORS

This section discusses how Article 30 of the AVMSD (Directive 2010/13/EU) is implemented.

Summary

The lack of media regulation in previous decades has been a significant contributing factor to the current situation, whereby private media is being captured and it is becoming increasingly challenging to protect independent journalism. The National Council for Radio and Television (NCRTV), which oversees the radio and television market, has been and continues to be subject to political influence.

The main reason for this is that its members are selected by a parliamentary committee where the ruling party has a majority. One of the key concerns regarding the Council is its transparency in terms of ownership. The publication of NCRTV's annual reports on major developments in the audiovisual sector is often subject to long delays, which raises concerns about the execution of the regulator's operational responsibilities. Consequently, the public is not made aware of significant changes in media ownership in a timely manner, and there is a lack of transparency in the media registries.

The Council has experienced a reduction in funding since the Greek financial crisis, which has resulted in a shortage of personnel, leading to operational difficulties.

Legal and operational independence

The National Council for Radio and Television (NCRTV) is the administrative authority responsible for the supervision and regulation of the radio and television market, both offline and online. The NCRTV is an independent authority, as set out in the Greek Constitution, with its legal framework defined in the Media Law.

It is the responsibility of the Council to ensure that all broadcasts comply with the relevant provisions of Greek law and those set out by the European Commission. The Council oversees the activities of broadcasters in relation to their informational, educational, cultural and entertainment responsibilities towards the public. It also ensures that fundamental benefits such as freedom of expression, political and cultural pluralism and the provision of reliable, fair and balanced information are upheld. The Council also has the authority to regulate media companies and may impose fines or grant licences as necessary.

The Greek legal framework for media pluralism and freedom is based on constitutional protections and specific legislative measures. The Greek Constitution guarantees freedom of expression and freedom of the press, as well as the right of

access to information. Audiovisual media in Greece are regulated by Law 4779/2021¹, which incorporates the provisions of the Audiovisual Media Services Directive (AVMSD). Specifically, Article 30 of the AVMSD is incorporated into Greek law as Article 33.²

According to the Greek Constitution³, “radio and television are under the direct control of the State. The control and the imposition of administrative sanctions are the exclusive competence of the National Council for Radio and Television, which is an independent authority, as defined by law”.⁴

According to the law, “NCRTV shall exercise its powers impartially and transparently, serving in particular the objectives of pluralism, cultural diversity, consumer protection, accessibility for persons with disabilities, equal treatment, the proper functioning of the internal market and the promotion of fair competition in the field of its competence. In the performance of its tasks, it shall not seek or take instructions from any other body. Where necessary, it may cooperate with other competent bodies for the effective exercise of its responsibilities”.⁵

Being an independent authority means that the NCRTV “enjoys full functional independence from the Government and from any other public or private entity”.⁶

Composition of the regulator’s board

The NCRTV is composed of nine members appointed by the Conference of Presidents, a special body of the Parliament responsible for appointing the independent authorities, in which all political parties are represented.⁷

The Conference of Presidents, acting unanimously or by a majority of 3/5 of its members, has the power to select the members of the independent authorities provided for by the Constitution and to exercise parliamentary control over them.⁸ It should be noted that prior to the constitutional amendment in 2019, the members of the independent authorities were elected by a 4/5 majority of the Conference of Presidents.

The members of the Authority are appointed for a non-renewable period of six years and enjoy absolute personal and operational independence in the performance of their duties, guaranteed by the Constitution. The members of the NCRTV are personalities of high standing and social prestige, distinguished by their scientific competence and their professional skills in the legal, academic and mass media

¹Law Number 4779, Official Gazette A 27/20.2.2021.

²Law Number 4779, Art. 33.

³The Constitution of Greece, as revised by the parliamentary resolution of May 27th 2008 of the VIIIth Revisionary Parliament, hereafter ‘Greek Constitution’.

⁴Greek Constitution, Art. 15(2).

⁵Law 4779/2021, Art. 33 para 2.

⁶Law 4779/2021, Art. 33, para 1.

⁷Law 2863/2000, Art. 2 para. 1.

⁸Art. 13 & 14 of the Standing Orders of the Greek Parliament.

fields. There is no provision for the dismissal of a member.

Independence of the regulator's members

In selecting its members, the Conference follows the recommendation of the Committee on Institutions and Transparency. The committee is made up of 27 members of parliament and a majority is required for important decisions. The ruling party has a majority, which gives it control over the process. As a result, the selection of NCRTV members is subject to political connections.

In September 2024, there were reports⁹ of attempts to interfere in the functioning of the independent authorities of the Hellenic Authority for Communication Security and Privacy (ADAE) and the NCRTV.¹⁰

More specifically, Rules 13 and 14 of Parliament's Rules of Procedure, as amended and in force, govern matters relating to the composition, convening and powers of the Conference of Presidents of Parliament. On 7 September 2023, the Plenary of the Parliament amended this provision of the Parliament's Rules of Procedure and added another member to the Conference of Presidents: the President of the Special Standing Committee on Research and Technology.¹¹

The specific decision was the element that determined the majority which enabled the government to appoint new members to the two independent authorities. It should be noted that both authorities were about to meet in order to take two very important decisions concerning a) the Hellenic Authority for Communication Security and Privacy (ADAE) for a fine of €100,000 against the National Security Agency in the case of the wiretapping scandal, and b) the NCRTV for a fine of €2 million against the party Hellenic Solution (whose representatives voted for the appointment of the new members in both authorities). In the first case, the decision came two weeks later (with the new members of ADAE) and the majority decided not to impose a fine on the National Security Agency. In the second case, the NCRTV also decided to reconsider the height of the fine against Hellenic Solution.

In May 2024, the Athens Bar Association asked the Council of State to annul the ministerial decisions electing the members of the ADAE and the NCRTV.¹² At the time of writing, no decision has been taken.

The authority has not made any provisions for representatives of the opposition or independent NGOs.

⁹"Reflections on the selection of members of ADAE and NCRTV: Was this an attempt to interfere in the functioning of these independent authorities?", Govwatch, 17 October 2023.

¹⁰Kostas Botopoulos, "Ανεξαρτησία προς απόδειξη" ('Independence to prove'), Syntagma Watch, 29 September 2024 (in Greek).

¹¹Article 1 of Plenary Resolution No. 10826/7268/7-9-2023 (Government Gazette A 148/8-9-2023).

¹²Mina Moustaka, "Στο ΣτΕ οι αιτήσεις ακύρωσης υπουργικών αποφάσεων για ADAE και ΕΣΡ" (In the Council of Ministers, the applications for annulment of ministerial decisions for ADAE and ESR), 17 June 2024, To Vima (in Greek).

Financial autonomy

In terms of financial and human resources, the Media Pluralism Monitor (MPM 2022) considers the independence and effectiveness of the media authority to be an area of medium risk.¹³

The latest annual report of the authority, published in summer 2024, includes a dedicated chapter on human resources. The number of permanent staff, which in 2009 was 81, has now reduced to 57, with 18 positions remaining vacant. The plenary of the authority has concluded that the 18 vacant positions must be filled, yet this has not yet occurred as of 2024.¹⁴

In terms of the financial resources of the NCRTV, it is worth noting that they are indeed ensured by national law, as is the case with every independent authority.¹⁵ The Ministry of Finance is the “proprietor” of NCRTV. Annually, the authority presents a budget proposal, and the Ministry determines the amount to be allocated. Therefore, the budget is not fixed but is subject to the country’s financial situation.

The 2022 annual report indicates a budget of €2.3 million. Furthermore, the report notes that the Authority’s budget has undergone a significant reduction since 2010, largely due to the broader cuts in state budget expenditure that have been implemented.¹⁶ There was a reduction of over 45% between the 2010 and 2015 budgets, largely attributable to salary and operating costs associated with the NCRTV.

According to the 2022 annual report, the consequence of this large reduction in expenditure was the significant difficulty for the authority to function properly and to fulfil its mission without any disruption. In addition to the large salary cuts suffered by the Authority’s staff, there were major difficulties in maintaining and updating the information systems and other mechanical/hardware equipment of the NCRTV, the inability to participate in conferences and events of international organisations, and “difficulties in the supply of books, writings, printing paper, stationery and other consumables.”¹⁷

The agency has its own specialised budget, which is to be used for the implementation of its activities.¹⁸

¹³2022 Media Pluralism Monitor, country report for Greece, p. 10.

¹⁴NCRTV Annual Report 2022, p. 19 (in Greek).

¹⁵Law No. 2863/2000, National Council For Radio And Television And Relevant Authorities And Instruments of The Radio And Television Services Provision Sector, hereafter ‘Law No. 2863’ (in Greek).

¹⁶NCRTV Annual Report 2022, *cit.*

¹⁷NCRTV Annual Report 2022, *cit.*

¹⁸Law No. 2863.

Tasks and accountability

The decisions of the regulatory authority are fully public and accessible via the Transparency Portal¹⁹, which is the official repository for all acts and decisions of Greek government institutions. Each document is digitally signed and assigned a unique number, thereby ensuring that acts and decisions are not valid unless published online.

The decisions of NCRTV are not uploaded to its website due to technical restrictions. It is also noteworthy that the speed with which the annual reports of the authority are being published is relatively slow. The 2022 report was published in the summer of 2024. Unfortunately, there is no specific date of the update available on the authority's website.

The Euromedia Ownership Monitor, which monitors media ownership transparency in European countries, has identified a lack of transparency in the broadcasting market in Greece.²⁰ This is due to the NCRTV, the relevant regulatory authority, releasing reports on its activities and decisions or on major developments in the audiovisual sector with apparent delay. This is in breach of the operational responsibilities expected of it.

Furthermore, the Council has a Department of Transparency that addresses all ownership changes in TV channels. However, the public data provided by this department are not fit for purpose due to the significant delays in their publication.

Appeal mechanisms

The authority's decisions are not subject to secondary controls at the national level. However, following a decision by the NCRTV, there is the option to appeal to the authority itself, provided that additional information or data on the case is provided. Furthermore, a case may be referred to the Council of State²¹, which serves as the Supreme Administrative Court of Greece. The case is reviewed for its compliance with the relevant legislation, rather than for its substance. The Supreme Court does not have an appellate role. The authority reviews the procedures and decisions to ensure that the correct legislation was applied and that the proceedings were conducted fairly.

In 2023, the NCRTV made a decision that was appealed to the Council of State. The decision concerned fines of €30,000 each imposed on two online Greek media outlets, Zougla and Makeleio, for the promotion of low-quality audiovisual content and a breach of the obligation to respect human dignity. The owners of the media sought the annulment of the fines, disputing NCRTV's authority to impose penalties

¹⁹See [here](#).

²⁰Greece in [Euromedia Ownership Monitor](#).

²¹See [here](#).

on website owners.²²

The Council of State ruled in August 2023 that the matter should be referred to the Court of Justice of the European Union for a preliminary ruling.²³ As of the time of writing, the European court has not yet issued a decision.

The latest data indicates that in 2022, the Council of State handed down nine decisions regarding rulings by NCRTV. In eight out of nine cases, the ruling was upheld by the Council of State. There is currently no data available on instances where the authority has reversed a decision. In 2022, there were 104 sanctioning decisions²⁴. However, one needs to monitor each case separately to ascertain whether it was reversed.

Power to request information

The NCRTV has a mandate to request data from media service providers. All members are entitled to request any information from Greek or foreign institutions or companies under the authority's jurisdiction.

Independent monitoring of the regulator's activity

There is currently no independent mechanism in place to monitor the regulatory authority's activity. The only published report is that issued by the NCRTV. It should be noted that the authority is under the supervision of the Greek Parliament, specifically the Special Permanent Committee on Institutions and Transparency.

It is the responsibility of each Independent Authority to submit an annual report on the activities and proceedings of the previous year. The reports are either transmitted to the Special Permanent Committee on Institutions and Transparency or to the relevant Standing Committee, or any other competent committee, which should then provide the Speaker of Parliament with a written account of the conclusions and findings. The Speaker forwards the committee reports to both the government and the independent authority. Subsequent reports on findings may be the subject of debate in the Plenum, but there will be no voting.

²²“ΣτΕ: Το ΕΣΡ δεν μπορεί να επιβάλει πρόστιμα σε παρόχους τηλεοπτικού περιεχομένου μέσω διαδικτύου” (SC: ESR cannot impose fines on internet TV content providers), TaxHeaven, 4 August 2023 (in Greek).

²³Decision of the Council of State (in Greek).

²⁴NCRTV Annual Report 2022, p. 37 (in Greek).

INDEPENDENCE OF PUBLIC SERVICE MEDIA

This section discusses how Article 5 of the EMFA is implemented.

Summary

Despite the stabilisation of the public broadcaster, the Hellenic Broadcasting Corporation (ERT), after years of crisis and a reduction in partisan influence, both it and the Athens-Macedonian News Agency (ANA-MPA)²⁵ continue to experience varying degrees of political control and influence.

The ERT has experienced varying levels of government control, and continues to face challenges in maintaining editorial and institutional independence, largely due to insufficient safeguards against political influence. The Athens-Macedonian News Agency (ANA-MPA) is confronted with comparable challenges to ERT.²⁶

However, while ERT's influence on the Greek media landscape has declined over time, ANA-MPA still plays a significant role in shaping news content across the country. Given its central role in producing and distributing news, the agency is a key target for political control, with successive governments exerting influence through politicised appointments. The ongoing supervision of both media outlets by the Office of the Prime Minister raises concerns about their independence.

Editorial and operational independence

The public service media sector in Greece comprises the Athens News Agency-Macedonian Press Agency (ANA-MPA) and the national TV broadcaster ERT.

ERT comprises six TV and web channels (ERT1, ERT2, ERT3, ERT Sports HD, ERT World, ERTNews) and eight radio stations (First Programme, Second Programme, Third Programme, ERA Sport, Kosmos 93). The company's other assets include six TV and web channels (Voice of Greece, ERA 5, 102 FM, 95.8 FM), the websites ert.gr, ertflix.gr (streaming platform), mousikasynola.ert.gr (Music Ensembles), ertnews.gr, and ertsports.gr. It has approximately 3,000 employees.

It is notable that there are no legal guarantees in place to ensure that public service media providers are editorially independent. According to its mandate, ERT is required to ensure pluralism, the independent transmission of information and news, and the promotion of works of art and literature.²⁷

In line with its mandate, the NCRTV is the authority responsible for supervising the

²⁵See more [here](#).

²⁶See more [here](#).

²⁷[Hellenic Broadcasting Corporation](#).

public broadcaster, with the objective of ensuring “the objectivity, equality of conditions and quality of the programmes, in accordance with the Constitution.”²⁸

Nevertheless, there have been numerous instances where the public broadcaster has been found to be non-compliant. One illustrative example of the control exerted over ERT can be observed in its coverage of the Greek spy scandal. This scandal revealed that the Greek secret service (EYP) had been spying on journalists, politicians, the head of the Greek army, and other individuals.²⁹ Concurrently, the same individuals were subjected to surveillance via Intellexa's Predator spyware.

The scandal was brought to light in April 2022.³⁰ Until March 2023, neither the victims of surveillance nor the journalists who had uncovered the story had been interviewed by the public broadcaster. Furthermore, the findings of the European Parliament's Committee of Inquiry on Pegasus and other spy programs (PEGA)³¹, which included specific conclusions and recommendations for Greece, were never disseminated.

An additional illustrative example is the censorship case involving Kyriakos Mitsotakis during the pandemic. In February 2021, it was disclosed that ERT had censored news reports of the Prime Minister's visit to the Greek island of Ikaria, during which he contravened the government's regulations.³²

A memorandum from the management of ERT was disclosed to the public.³³ It explicitly instructed the producers and journalists of ERT not to broadcast images and videos of Prime Minister Kyriakos Mitsotakis that had been captured during his visit to the residence of fellow New Democracy MP Christodoulos Stefanadis in Ikaria.³⁴ Mitsotakis was photographed in the company of 40 other individuals, in contravention of government-mandated restrictions designed to contain the spread of the pandemic.³⁵

During the period of the pandemic crisis, there was a notable absence of reporting on the conditions in hospitals and the complaints of the medical staff, or at the very least, these issues were not given the attention they deserved. The initial press conference held by hospital doctors was not broadcast, as were reports concerning the resignation of heads of hospital clinics and the termination of the contract of the representative of hospital employees. In March 2021, the Syriza government

²⁸National Council for Radio and Television.

²⁹Tasos Telloglou, Eliza Triantafyllou, “Αυτοί είναι οι κοινοί στόχοι ΕΥΠ και Predator” (These are the joint targets of EYP and Predator), Inside Story, 26 July 2024.

³⁰Tasos Telloglou, Eliza Triantafyllou, “Who was tracking the mobile phone of journalist Thanasis Koukakis?”, Inside Story, 11 April 2022.

³¹News release, Spyware: MEPs sound alarm on threat to democracy and demand reforms, European Parliament, 8 May 2023.

³²Manos Chorianoopoulos, “Αποκλειστικό βίντεο: Γλέντι σε σπίτι στην Ικαρία με πάνω από 50 άτομα, παρουσία Μητσοτάκη” (Exclusive video: Party at a house in Ikaria with over 50 people, in the presence of Mitsotakis), News247.gr, 6 February 2021.

³³“Θύελλα αντιδράσεων για τη λογοκρισία στην ΕΡΤ σχετικά με το τραπέζωμα στην Ικαρία” (Storm of reactions to the censorship in ERT regarding the dining in Ikaria), Efsyn.gr, 8 February 2021.

³⁴Storm of reactions to the censorship in ERT, *cit.*

³⁵Storm of reactions to the censorship in ERT, *cit.*

directed its criticism towards the public broadcasting service, claiming that it had declined to cover or present its new policy proposal for the Greek National Health System.³⁶

With regard to ANA-MPA, the principal source of political influence over the agency remains the appointment of government officials to its management board. The board of directors is constituted of nine members, the majority of whom are appointed by the government.

In November 2022, the Journalists' Union of the Athens Daily Newspapers (ESIEA) issued a statement in which it was asserted that the ANA-MPA had repeatedly violated the journalistic principle of pluralism.³⁷ The Union asserted that it frequently receives complaints pertaining to the manner in which the agency presents current affairs. These are presented solely through the responses of government officials, without any reference to the news that prompted the response or to statements that would provide a more comprehensive picture.

Legal provisions guaranteeing plurality of information

A variety of legal safeguards are embedded in national legislation to guarantee that public service media providers offer their audiences a diverse range of information sources. These guarantees are set out in the Greek Constitution³⁸, the EU Charter of Fundamental Rights³⁹, the 1995 law on private television⁴⁰, the 2015 law on licensing of TV channels⁴¹, and numerous other legislative instruments.⁴²

Governance bodies: composition and appointment

The governing board of ERT is constituted by seven members, as follows: the President, the Managing Director, two representatives of ERT's employees (one of whom shall be a journalist) and three members with specialised knowledge and

³⁶[“ΣΥΡΙΖΑ: Η ΕΡΤ αρνείται να προβάλλει ομιλία Τσίπρα για το «νέο ΕΣΥ”](#) (SYRIZA: ERT refuses to air Tsipras' speech on the "new ESY"), Topontiki.gr, 1 March 2021.

³⁷[“Επιστολή της ΕΣΗΕΑ προς τη διοίκηση του ΑΠΕ-ΜΠΕ”](#) (Letter from ESIEA to the administration of APE-MBE), 17 November 2022.

³⁸Greek Constitution, Art. 14.

³⁹[EU Charter of Fundamental Rights](#): 'Freedom of the media and pluralism shall be respected', Art. 11, para. 2.

⁴⁰[Law 2328/1995](#) stipulates: “The TV stations to which the licences are granted are obliged to ensure the quality of programming, objective information, the safeguarding of pluralism and the promotion of culture through the broadcasting of art and speech”.

⁴¹[Law 4339/2015](#) mentions that the provision of services must “ensure, on the one hand, legality, transparency, political and cultural pluralism and pluralism and free and undistorted economic competition in the wider media sector and, on the other hand, the provision of a high quality of television services to the public”.

⁴²[NCRTV decision on media pluralism, 2/2023](#).

expertise.⁴³ Prior to the current iteration of the management board, there existed no legal safeguards to guarantee the independence of the appointment process.

It is notable that the RT boards lack representation from either the opposition or an independent NGO.

There are two reasons for this. In the first instance, the members of the Board are appointed by the Minister responsible for the media, following the Committee on Institutions and Transparency of the Parliament's opinion on the Minister's recommendation. This procedure undermines the independence of the Board from the Government and the potential for political influence.

The second reason is that following the election of New Democracy in 2019, the first action taken by Prime Minister Kyriakos Mitsotakis was to place the General Secretariat of Information and Communication, the supervisory body of ERT and the ANA-MPA, under the authority of the Greek Prime Minister's Office.⁴⁴

The rationale for the measure at the time was twofold: firstly, to stabilise the broadcaster and secondly, to reduce political partisanship, which had been continued under the previous government. Yet, Konstantinos Zoulas, the former head of the press office of the Mitsotakis party, was appointed by the prime minister as president of ERT, prompting accusations of overt political interference.⁴⁵

In September 2023, a change was made to the legislation that governs the organisation, administration, operation and state supervision of state companies and organisations, including ERT and the ANA-MPA (law 3429/2005)⁴⁶. Recently enacted legislation pertaining to the "corporate governance of state companies"⁴⁷ stipulates that the Supreme Council for Civil Personnel Selection, through a competitive process involving written and oral examinations, shall propose three candidates. Subsequently, the Deputy Minister to the Prime Minister responsible for the supervision and regulation of organisational matters of the public broadcasters will select and appoint one of the three candidates. This indicates that the appointment of management personnel will continue to be influenced by political factors.

⁴³Law 4324/2015 on regulations of Public Broadcasting Organization, Hellenic Radio Television Corporation and amendment of article 48 of the law. 2190/1920 and other provisions, hereafter Public Service Media Law.

⁴⁴Thodoris Chondrogiannos, "Public service broadcasting placed under the control of the Prime Minister", GovWatch, 18 October 2020.

⁴⁵"Επίθεση ΣΥΡΙΖΑ στον Μητσοτάκη για τον διορισμό Ζούλα στην ΕΡΤ" (SYRIZA attack on Mitsotakis for appointing Zoula to ERT), To Vima, 12 August 2019.

⁴⁶Dimitris Katsaganis, "Το νέο καθεστώς επιλογής διοικητών στο Δημόσιο" (The new regime for selecting administrators in the State), Capital.gr, 26 October 2023.

⁴⁷Law 4972/2022 on Corporate governance of the Public Limited Companies and the other subsidiaries of the Hellenic Holdings and Property Company [...] (in Greek).

Governance bodies: term

The tenure of the ERT's board is four years, with the possibility of renewal for a further four-year term, subject to the decision of the Deputy Minister.

Governance bodies: dismissal conditions

The dismissal of the ERT Board may occur in one of two ways:

- by decision of the competent body, in accordance with the Performance Contract, due to the non-achievement of set objectives, upon submission of the relevant documentation to the Presidency of the Government;⁴⁸
- by decision of the Deputy Minister to the Prime Minister, in cases of indications of irregular performance of duties, based on a report by the competent inspector, or criminal prosecution for an offence which may lead to disqualification from the service.

Funding

In accordance with the legislation of the Hellenic Republic, the share capital of ERT is vested exclusively in the Greek State. It is endowed with administrative and financial autonomy.⁴⁹ The broadcaster's principal source of revenue is a contributory tax of €3 per month levied on the electricity bills of Greek citizens. ERT also generates commercial revenue through advertising.

Revenue generated from the contributory tax levied on electricity bills for ERT, 2020-2022

Year	Amount (€m)
2020	186.99
2021	188.27
2022	190.74

Source: [ERT](#).

The public provider has asserted that the stable and predictable source of funding serves to guarantee the public character and independence of ERT, in contrast to

⁴⁸[Law 5062/2023 on a new system for selecting administrations of public sector bodies, strengthening their effectiveness and other provisions](#), Art. 12 (in Greek).

⁴⁹Public Service Media Law, *cit.*

the model of direct state funding from the budget, which is exemplified by other European broadcasters.⁵⁰

The national broadcaster ERT and its TV and radio channels are subject to the laws of free competition, including the placement of advertisements. In accordance with legal stipulations⁵¹, the placement or transmission of advertising messages, the sponsorship of a broadcast, or the allocation of space in print, radio, or television for the purpose of transmitting advertising messages, shall be conducted exclusively with the prior written authorisation of the advertiser or the advertiser's duly authorised agent, as directed to the medium.

The order must specify the value of the transaction, in accordance with the price list of the medium, including any discounts, the exact determination of the space or time of display, the date or deadline for payment, as well as the statutory charges.

On an annual basis, the Deputy General Manager of Marketing and Commercial Exploitation of ERT presents the Board of Directors with the company's proposed annual commercial policy. While the prices are publicly available⁵², it is not straightforward to locate ERT's ads. Moreover, the list of purchasers is not available.

Finally, law permits the broadcasting of advertisements, provided that they "respect the personality, honour, reputation, private and family life, professional, social, scientific, artistic, political or other relevant activity of any person whose image appears on the screen or whose name or data are sufficient to identify him or her."⁵³

ANA-MPA is financed through a combination of state grants, a modest allocation from the European Parliament, and advertising revenues, the latter of which are not publicly disclosed. The organisation employs over 300 individuals.

The financing and expenditure of public media outlets are made publicly available through the publication of their annual results on their respective websites and in the Greek business registry.

Independent monitoring mechanisms

There is no independent monitoring mechanism in place to ensure the editorial and functional independence of public service media. These media outlets are susceptible to political influence from the government, given that the heads of management are appointed by the Deputy Minister. The only recourse available to employees is to lodge a complaint with the journalist's union, although this could potentially result in retaliation from management.

⁵⁰Law 4173/2013, Art. 6 para. 3.

⁵¹[Law 2328/1995 on legal status of private television and local radio, regulation of matters concerning the radio and television market and other provisions.](#)

⁵²See [here](#).

⁵³Law 2328/1995, Art. 3.

In regard to the multiplicity of information, the sole authoritative entity is the NCRTV, which, as stated in its own guidelines, is responsible for ensuring that the public is provided with objective and politically informed content, in line with the right to receive information: “Providers and their employees are obliged, in the exercise of their duties, to investigate and identify newsworthy political information by any appropriate and legitimate means. It is, however, the editorial decision of each provider to choose how to fulfil its obligation to ensure objective and pluralistic information to the public so that political parties are presented in approximate proportion to their parliamentary strength, provided that there are worthy broadcasts of their views and activities”.⁵⁴

The distribution of public media services is free of charge, in accordance with the legal requirement that the state network provider for its own television stations, the parliament channel and the foreign language news channels of the broadcaster is public television.⁵⁵

⁵⁴Obligations of media service providers in accordance with [Law 4779/2021](#).

⁵⁵[Law No. 4070/2012 on Electronic Communications, Transportation, Public Works and other provisions](#) (in Greek), Art. 21.

MISUSE OF STATE FUNDS TO INFLUENCE MEDIA OUTPUT

This section discusses how Article 25 of the EMFA is implemented.

Summary

A significant factor in the context of media capture in Greece is the financial reliance of media outlets on state support and advertising, which creates a vulnerability to the potential for editorial interference. For decades, the Greek state and the media have enjoyed a close relationship. It is standard practice for the state to provide funding to any media outlet it chooses, without the usual prerequisites such as circulation figures or audience measurement.

A scandal, known as the Petsas List, which broke during the pandemic shone a spotlight on this issue and led to significant reform in 2022. However, it remains to be seen whether this reform will prove effective, and other issues regarding state support for the media remain. Subsequently, the General Secretariat for Media and Communication has launched an updated version of the e-Pasitheia platform, which provides electronic services for reporting advertising expenditure and submitting applications for approving public sector advertising programmes. The data in question is not yet available to the public.

State funding spending: legal provisions, criteria for distribution and tender procedures

In the case of public funds allocated to media service providers, the same criteria are applied as in other public contracts. The state's dealings with private parties are governed by a set of overarching principles.

National law provides for the distribution of public funds allocated for state advertising⁵⁶ to a wide plurality of media service providers⁵⁷, but the implementation process lacks transparency. In accordance with Greek law, the distribution of state advertising is contingent upon a number of factors.

For example, online media outlets are required to register with the Online Media Registry in order to qualify for state advertising. Furthermore, funding is to be distributed in a proportional manner, based on factors such as the size, reach and region of the media in question.

However, in the case of the scandal known as the “Petsas list,” a few years ago, an intermediary company was used to distribute funding to selected media outlets

⁵⁶Presidential Decree 261/1997, “Procedure for commissioning the transmission of advertising and other public service messages” (in Greek), Art. 6.

⁵⁷Law 5005/2022 on prohibition of advertising of public and general government entities in non-certified publications or websites with informative content (in Greek), Art. 22.

without the necessary accountability or transparent process.

In order to facilitate the dissemination of public health messages encouraging people to stay at home during the lockdown, the government allocated €20 million to the media. The distribution of these funds was outsourced to a private company, thus circumventing the obligation to make public all transactions conducted by the state, as well as those recorded in the Online Media Registry. Following mounting pressure from the public, the government finally released the so-called “Petsas list”, named after government spokesperson Stelios Petsas, which detailed all media outlets and their allocated sums. The list substantiated the assumption that the funds had been distributed in accordance with the government’s agenda.⁵⁹

Transparency of state media contracts

Vouliwatch, the parliamentary monitoring and transparency watchdog, has been campaigning for three years for effective transparency and accountability of the use of public money in the case of the Petsas List. In October 2023, having exhausted all national legal avenues, the non-profit organisation appealed to the European Court of Human Rights, requesting full transparency and access to all data and criteria related to the allocation of funds.⁶⁰

The e-Pasitheia platform⁶¹ offers a range of digital services, including the electronic submission of advertising expenditure reports and the electronic submission of applications for the approval of advertising programmes in the public sector. However, the data regarding state advertising on the platform is not publicly accessible.

Some services of the platform are intended for use by public sector departments, which are required to upload relevant state advertising. E-Pasitheia is also designed to publicly provide contact details in print media, a list of approved advertising programmes, advertising expenditure reports and public opinion poll reports. However, upon attempting to navigate to the relevant page, one receives a “Not Found” response from the server.

The General Secretariat for Media and Communication has announced the imminent release of a new e-Pasitheia platform. According to the government, this upgraded information system will be publicly accessible without the need for an access code and will contain data relating to the programmes approved by the General Secretariat of Communication for the promotion of public bodies and the wider public sector, as well as the accounting data of their communication expenditure. The new platform is scheduled for release in the near future, although the exact date has not yet been confirmed.

⁵⁹Karyotakis, “Exercising control...”, *cit.*

⁶⁰“[Υπόθεση Λίστας Πέτσα · Το Vouliwatch προσφεύγει στο ΕΔΔΑ](#)” (Petsas list case · Vouliwatch appeals to the ECtHR), 18 October 2023.

⁶¹See [here](#).

Monitoring state advertising spending

It is not within the remit of the NCRTV to monitor the allocation of state advertising. The e-Pasitheia platform is designed to provide state advertising reports, but these have not been made public in recent years.

The Hellenic Court of Audit, the supreme financial verification institution, is responsible for auditing the use of public funds in Greece in accordance with the principles of legality, regularity and sound financial management. The Court may request additional details regarding the allocation of state advertising expenditure. Furthermore, the Greek Parliament, and in particular the Special Permanent Committee on Institutions and Transparency, has the authority to request such information.

Another institution that can play a role in monitoring state advertising spending is the Hellenic Single Public Procurement Authority (HSPPA)⁶², which is an independent authority. Its purpose is to “ensure transparency, efficiency, cohesion and compliance in the implementation of public procurement procedures and contracts with national and European law.” However, its remit does not cover only the media, and its reports do not involve a specific list of allocations or that kind of data.

With regard to the total annual amount of public funds for state advertising allocated to them, the media do not make this information public. The state is required to publish details of how state funding is allocated, but the transparency portal, which contains hundreds of such announcements, is not easily navigable. Moreover, there is no annual report that provides a comprehensive overview of the state funding and its allocation.

Furthermore, there is no obligation on the part of the media to disclose advertising revenues. The only exception is related to banking institutions. Following the recapitalisation of Greek banks, the relevant legislation⁶³ requires that the banks publish their advertising expenses in the media. This decision was reached as a result of an agreement between Greece and the European lenders with the aim of avoiding any improper interconnection between banks, the media and the government.

Among NGOs, Vouliwatch⁶⁴ (Vouli means Parliament in Greek) is a non-partisan parliamentary monitoring and democracy watchdog organisation that monitors parliamentary activities and MPs, including their financial interests. During the pandemic, they monitored state funding allocated to the media and uncovered the misuse of funds in the case of Petsas list. This monitoring was a one-time process. Currently, there is no NGO monitoring state advertising expenditures to media service providers.

⁶²See [here](#).

⁶³Law No. 4374/2016, *cit*.

⁶⁴See more [here](#).

MEDIA PLURALISM AND POLITICAL/STATE INFLUENCE OVER NEWS MEDIA

This section discusses how Articles 6 and 22 of the EMFA are implemented.

Summary

The landscape for private media ownership in Greece is characterised by a small number of wealthy and politically connected families with extensive cross-ownership interests in key sectors, often reliant on public contracts from the government. The dominant force of media ownership in Greece is now composed of shipowners and major investors in the industry.

However, these owners also have a multitude of other assets in different sectors. Many of these individuals have clear personal and even familial links to political parties, particularly the governing New Democracy party. In other instances, the evident political affiliations of the media owners are well-documented.

The practice of journalists moving into politics has served to further entrench these connections. It is also common for media owners in Greece to have connections to the banking industry. Furthermore, media assets with sports titles are often combined with sports club ownership. In recent years, new market entrants have also purchased media assets as part of a wider package of acquisitions.

In this context, major media outlets frequently serve as vehicles for advancing specific narratives or supporting political parties, rather than as platforms for public interest reporting and holding power to account. The level of interference by media owners at different titles has varied significantly over the past few decades, with some media outlets facing greater challenges than others.

There are numerous pressures on editorial independence and journalistic output. Even in cases where owners do not engage in heavy-handed meddling, self-censorship is a prevalent practice among journalists who are aware of the boundaries of permissible investigations and topics.

Transparency: legal requirements

Media ownership

Many elements of Articles 6 and 22 of EMFA are covered by Greek law, but they're not always followed. In accordance with the provisions set forth in the Greek Constitution, all Greek TV channels and radio stations are required to disclose their

ownership status to the National Council for Radio and Television (NCRTV).⁶⁵

The NCRTV is requesting the following data from TV and radio stations:

- A certificate from the business registry and a Certificate of Valid Representation
- A copy of the minutes from the most recent Annual General Meeting
- A copy of the balance sheet and summary of the financial statements. In particular, and only for licensed stations of national scope, a certificate from the auditor/accountant on the amount of the paid-up share capital and the amount of equity capital must be submitted for the relevant financial year
- A list of all employees with an employment relationship
- A certificate of insurance coverage
- A certificate of tax compliance
- A copy of the most recently submitted Statement of Assets and Liabilities to the Anti-Money Laundering Authority, along with proof of registration and a table with the details of the individuals required to submit it and their status
- A declaration by the shareholders, members of the board of directors, legal representatives and executives of the company regarding disabilities and incompatible qualities
- A statement by the legal representative of the company regarding:
 - a) its potential holdings in other media companies;
 - b) its potential participation in other companies other than online media; and
 - c) its incompatible qualities
 - A statement by the shareholders regarding:
 - a) their potential shareholdings in other media companies;
 - b) their potential participation in other companies other than online media; and
 - c) any assignment of voting rights at the General Meeting or the signing of contracts or proxies related to their shares
 - A detailed list of shareholders up to and including natural persons

The Online Media Registry commenced operations in March 2023, following the abolition of the former Registry, which had launched operations in 2017. Websites began registering in large numbers from 2024 onwards. Prior to this, the majority of websites did not disclose the legal owner, let alone the beneficial owner.

State funding

Media companies in Greece are not legally obliged to disclose the following information:

- The total annual amount of public funds for state advertising allocated to them
- The total amount of advertising revenues received from third-country public authorities or entities
- Any money received from third-country public authorities or entities.

⁶⁵The Greek Constitution states: “the ownership status, the financial situation and the means of financing of information media must be made known as specified by law. The measures and restrictions necessary for fully ensuring transparency and plurality in information shall be specified by law” (Art. 14 para 9).

The General Secretariat for Media and Communication has launched the online media registry, "e-media". This is an initiative aimed at all media owners with an online presence (websites), encouraging them to register their activities online. This will ensure transparency, balance and fairness in the functioning of the media industry in the non-linear environment. The primary motivation for media organisations to register with the registry is to become eligible for public funding including state advertising, subsidies or grants.

The data requested is as follows: company name, distinctive title, legal form, registered office, address of organised office, VAT number/competent tax office, website manager, website editorial manager, owner and website.

In a similar manner to that of TV and radio, online websites are not obliged to provide information regarding state funding.

With regard to the matter of owner data, it should be noted that the general issue of having a nominee (lawyer/accountant) as an owner persists across all media, making it challenging to identify the true owner of a media entity.

National media ownership databases

National legislation mandates the establishment of national databases for the regulation of media ownership. With regard to online and print media, this is stipulated by Law 5005/2022.⁶⁶ In the case of television and radio, the responsibility for such a database falls upon the NCRTV, as set forth in Law 2328/1995.⁶⁷

Assessment of media market concentrations

The Constitution prohibits⁶⁸ the concentration of control over more than one information medium of the same or different types. The concentration of control in the media sector is subject to the provisions of Law No. 3592/2007⁶⁹, which is complemented by Law No. 3959/2011 (the Greek Competition Law).⁷⁰

It is a legal requirement for TV and radio providers and newspaper editors to make public their beneficial owners. The aforementioned entities typically provide their legal name and contact information in a straightforward and accessible manner, either online or in print, as is the case with newspapers. In general, media owners comply with the obligation to disclose their direct or indirect owners.

⁶⁶[Law 5005/2022 regarding the enhancing of publicity and transparency in the printed and electronic press](#) (in Greek).

⁶⁷[Law 2328/1995](#) (in Greek).

⁶⁸Greek Constitution, Art. 14, para 9.

⁶⁹[Law No. 3592/2007 of 2007 on Concentration And Licensing of Mass Media Enterprises And Other Provisions](#).

⁷⁰[Law 3959/2011 on the Protection of Free Competition](#) in English (codified Jan 2022).

Nevertheless, there are instances wherein, despite the passage of time and the disclosure of control by companies and owners over a given media entity, the registry of ownership has not published the updated information. One such example is that of Alpha TV, where a company based in Luxembourg exercises 50% control over the TV channel, and the owner is a lawyer and an administration services company. Consequently, there is no information available regarding the beneficial owner.⁷¹

Notification of media market concentrations

The NCRTV has been observed to release reports on its activities and decisions, as well as on major developments in the audiovisual sector, at a slower pace than might be expected. Additionally, the Council has a Department of Transparency that handles all ownership changes in TV channels, but the public data it releases are not readily usable due to the significant delays in publication.

Consequently, alterations in media ownership will become apparent to the public either through journalists specialising in media and financial news or with a significant delay (potentially years) from the NCRTV. One of the reasons for this is the lack of personnel at the authority.

There are currently no regulations in place that mandate the Greek media regulator's substantive involvement in media market concentration. As previously stated, there is a legal framework of complementarity with Greek Competition Law, which designates the Hellenic Competition Authority as the responsible authority in this matter.

Impact of media market concentration on media pluralism and editorial independence

It is not a requirement of national law that the assessment of media market concentration should take into account the expected impact of such concentration on media pluralism, as required by EMFA Article 22. This includes the effects on the formation of public opinion and on the diversity of media services, as well as on the editorial independence of the media.

In the context of the media industry, the assessment of mergers and acquisitions is based exclusively on competition considerations.

To illustrate, in 2017 Vangelis Marinakis, a shipowner and the owner of Olympiacos FC, purchased the debt-laden media group Dimosiografikos Organismos Lampraki (DOL), which operated Mega TV and the daily newspaper. The acquisition also encompasses Sunday newspapers Ta Nea and To Vima, a number of digital media

⁷¹“Ποιος είναι ο αγοραστής του 50% του Alpha TV” (Who is the buyer of 50% of Alpha TV?), Euro2day.gr, 1 July 2022.

(including some of the largest news websites in the country such as in.gr, ot.gr, tovima.gr and tanea.gr), and a portfolio of magazines and a radio station. The Hellenic Competition Commission issued a statement confirming that the acquisition of DOL by Marinakis will not result in the emergence of a dominant position or a concentration of control that would impinge on competition.⁷² In March 2024 Alter Ego Media, the media group of Marinakis, also bought the commercial titles of the newspaper Eleftherotypia and the website enet.gr.⁷³

⁷²Decision 1163/2022 of the Hellenic Competition Commission (in Greek).

⁷³“Στην Alter Ego Media τα εμπορικά σήματα της «Ελευθεροτυπίας» (‘The trademarks of Eleftherotypia go to Alter Ego Media’), In.gr, 4 March 2024.

RECOMMENDATIONS

WHAT IS NEEDED TO CAPTURE-PROOF THE GREEK MEDIA

The recommendations are structured as follows:

- a) Recommendations aimed at aligning national legislation with the EMFA's general provisions; and
- b) Recommendations aimed at enhancing the media environment regardless of EMFA.

Independence of media regulators

Brief overview of EMFA provisions

The 2018 amendment of the Audiovisual Media Services Directive (AVMSD) already set out the requirements for independent media regulators. These include 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 set forth in Article 30 of the AVMSD, with the notable addition of provisions pertaining to the requisite resources, specifically technical resources, and the authority to request information and data. Consequently, prior to the implementation of EMFA, Member States are obliged to adhere to the majority of the requirements pertaining to independent media regulators as outlined in Article 30 of the AVMSD.

Aligning with EMFA's general provisions: what is needed?

The Greek legislative framework is largely aligned with EMFA's overarching principles concerning the autonomy of its media regulatory authority. To complete its alignment the following actions are recommended:

- It is recommended to enact legal provisions to guarantee the NCRTV board's political independence from the government and to define its powers and jurisdictions.
- It is recommended that the responsibility for media registries be transferred from the government and the prime minister's office to the NCRTV. To ensure greater scrutiny of ownership changes and practices, the Online Media Registry and Print Media Registry should be placed under the authority and supervision of an independent body.
- It is recommended that the NCRTV's media ownership registry be publicly accessible and regularly updated. Furthermore, the media regulatory authority should ensure that its annual reports are published in a timely manner.

Further enhancing the media environment: what is needed?

- It is recommended that the capacity and resources of the National Council for

Radio and Television (NCRTV) be strengthened, as it is currently under-resourced and unable to function effectively.

Independence of public service media

Brief overview of EMFA provisions

Article 5 of EMFA requires that governments guarantee the independent functioning of public media, including ensuring their editorial and functional independence, that procedures for appointing the management guarantee the independence of public media, that those appointed are done so on the basis of transparent, open, effective and non-discriminatory procedures and criteria, that funding is transparent, adequate, sustainable and predictable and can guarantee the editorial independence of the public media, and that an independent body is designated to monitor the application of these principles.

Aligning with EMFA's general provisions: what is needed?

- To ensure the continued independence of the ERT and the national news agency, an end to its oversight by the Office of the Prime Minister is recommended.
- It is recommended that a new system for appointments to supervisory and management boards of the ERT and ANA-MPA be established. This would end the ability of a government minister to select individuals and replace this with a more pluralistic system of appointment by civil society organisations.
- It is recommended that enhanced safeguards be put in place for the hiring, firing, or replacement of management and editors at ERT and ANA-MPA, with the aim of limiting political interference.
- It is recommended that an independent monitoring mechanism be established to guarantee compliance with legal standards for editorial independence, balanced coverage, and fairness. This mechanism should also assess the effectiveness of the broadcaster in fulfilling its public service mandate.

Further enhancing the media environment: what is needed?

- A more transparent decision-making process regarding all outsourcing activities of the public service media should be introduced to ensure greater transparency regarding contracts with private production companies and individuals.

Misuse of state funds to influence media output

Brief overview of EMFA provisions

Article 25 of the EMFA states that, while public procurement rules remain unchanged, state advertising must be awarded in accordance with transparent, objective, proportionate and non-discriminatory criteria.

Aligning with EMFA's general provisions: what is needed?

The Greek legislation is broadly consistent with EMFA's provisions. However, to bring it further into line the following actions are recommended:

- It is recommended that state funding to media outlets be presented in a transparent and easily accessible manner for the public. Information on spending should be updated on a regular basis and made readily available to researchers and the public.
- It is recommended that an independent body be established to oversee the allocation of state funding to the media, ensuring that the criteria for such funding are objective, proportionate, and non-discriminatory. Furthermore, annual reports on spending should be issued

Further enhancing the media environment: what is needed?

- It is recommended that the obligations related to the distribution of state funding exceed the requirements of EMFA and be applied to all local authorities, irrespective of population size.

Media pluralism and political/state influence over news media**Brief overview of EMFA provisions**

Article 6 of the EMFA requires news media organisations to provide information about their owners, including potential conflicts of interest, and to implement measures to ensure editorial independence. Article 22 of the EMFA requires governments to implement a system for the assessment of concentrations that could have a significant impact on media pluralism and editorial independence.

Aligning with EMFA's general provisions: what is needed?

- It is recommended that registration in the recently established Online Media and Print Registries be made mandatory for all media owners.
- It is recommended that there be greater transparency regarding the concentration of ownership in the news media industry, and that legislation be enacted to limit both vertical and horizontal ownership concentration to acceptable levels within the media landscape. It is recommended that the NCRTV's role in this matter be reinforced.
- More rigorous monitoring of media acquisitions in accordance with competition law should be implemented. Furthermore, it is recommended that media pluralism be incorporated as a primary evaluation criterion in assessing any prospective sales.
- It is recommended to ensure full transparency of media ownership, including all forms of beneficial ownership, in order to maintain the independence of the media from political connections and other associated business interests.

Further enhancing the media environment: what is needed?

- In media owned by wealthy and politically-connected commercial interests, robust internal safeguards and firewalls should be established and respected to prevent all forms of interference from owners and other political and business interests, while also protecting editorial independence and journalistic freedoms and discouraging self-censorship. To achieve this, media stakeholders should draw on the EMFA [Recommendations on internal safeguards for editorial independence and ownership transparency in the media sector](#).
- It is recommended that a stronger support fund for public interest, regional, community, and investigative journalism in Greece be established through public grants, which would be distributed on a tender basis through a third-party body with representation from journalistic and media experts from across the sector.

MEDIA CAPTURE MONITORING REPORT: GREECE

NOVEMBER 2024

This report by IPI is part of the Media Freedom Rapid Response, 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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