

MEDIA CAPTURE MONITORING REPORT: GREECE

The International Press Institute (IPI) and the Media and Journalism Research Center (MJRC) have partnered to produce the 2025 Media Capture Monitoring Report on Greece, the second annual report to measure media capture in the country and the degree to which the Member State meets the new EU regulation to combat the problem.

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

The Greek report focuses on 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 report examines the standards prescribed by law and how they are currently implemented in practice. It also sets out the areas of reform needed to bring the country into line with EMFA while also making recommendations for where reform can go further.

The report is intended an important tool for journalist and media rights groups and national policy makers to guide reform and monitor the degree to which Greece is meeting its obligations.

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

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EXECUTIVE SUMMARY

Changes in 2024/25

Even though the European Media Freedom Act (EMFA) entered into force on 8 August 2025, Greece has only taken limited steps towards aligning its legislation and practice with its provisions. While some legal frameworks already partially comply with EMFA requirements, core problems persist across regulation, public service media, and funding. Greece has not yet introduced substantive reforms to guarantee the independence of regulators and public service media, ensure fair state funding practices, or strengthen media pluralism. In the beginning of October 2025, a public consultation regarding a draft law about the Hellenic Broadcasting Corporation (ERT) and some measures regarding the implementation of the EMFA were concluded. The modernisation law includes EMFA-related provisions regarding ownership transparency and public spending for advertising, and a national plan for the safety of journalists. The final law and the improvements it entails remain to be confirmed.

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. Attempts to regulate the media environment have been made, the most significant occurring in 2015, when media moguls were required to pay for TV licences. The National Council for Radio and Television (NCRTV) has repeatedly been found to be vulnerable to political influence. Although the Council is formally an independent authority, its members are selected by a parliamentary committee in which the ruling party holds a majority, making the process highly susceptible to political interference. In addition, a loose legal framework sometimes allows unqualified individuals to be appointed to the Council, creating a transparency gap. Furthermore, limited financial resources and chronic understaffing further hinder the Council's ability to fulfil its mandate effectively. Its operation must be funded, like that of other independent authorities, by the supervised entities. Moreover, the restriction of the Council's role, confined largely to administrative functions rather than full regulatory authority, further undermines its effectiveness.

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

Independence of public service media

The impact of the ongoing process to amend the law governing ERT on the broadcaster's independence remains to be seen, as the process remains in the draft phase and additional changes could be expected following the public consultation. 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 repeated efforts to professionalise and depoliticise the broadcaster, ERT has consistently lacked the editorial and institutional independence required to shield it from political influence. While some managers and news directors have exercised more control than others, government

interference in ERT's operations has remained a persistent issue. Another ongoing challenge is the routine replacement of state media executives following changes in government. The same can be observed at 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 principle of pluralism. In 2024, a new administration was appointed at ERT, following a more impartial process, though the final decision still rested with the Deputy Minister. The 2025 Liberties Media Freedom Report¹ also found that public media in Greece remains vulnerable.

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, several traditional media groups ceased trading, allowing new owners, primarily oligarchs, to enter the market. The lack of effective media regulation over previous decades, combined with gaps in beneficial ownership disclosure, has further entrenched media capture. In 2025, this trend continued as oligarchs expanded their holdings by acquiring additional assets ranging from traditional newspapers to popular news sites, thereby increasing their media share. Concerns over the lack of transparency in digital media ownership have also intensified, raising further risks for pluralism.

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

¹ Jonathan Day, Franziska Otto, Eva Simon, Annual Rule of Law Report 2025 – Annex on Media Freedom, Liberties, 2025, https://www.liberties.eu/f/oj-aem/.

Analysis

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 of the authority 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 4779/2021², which incorporates the provisions of the Audiovisual Media Services Directive (AVMSD). Specifically, Article 30

² Law Number 4779, Official Gazette A 27/20.2.2021.

of the AVMSD is incorporated into Greek law as Article 33.3

According to the Greek Constitution⁴, "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".5

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".6

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

On 19 February 2025, the Council imposed a fine of €90,000 on Alter Ego Media, the parent company of Mega TV, following a complaint filed by Grigoris Dimitriadis, former general secretary to Prime Minister Kyriakos Mitsotakis. The complaint related to reports aired by the channel in 2023 and 2024 about the Predator spyware scandal and Dimitriadis' alleged involvement. These broadcasts were based on journalistic investigations conducted by other media outlets rather than Mega TV's own reporting. In its decision, the Council argued that Mega TV had "repeatedly violated the provisions requiring respect for the personal integrity of individuals featured in broadcasts'. The Board of the Journalists' Union of the Athens Daily Newspapers (ESIEA) expressed concern over the reasoning, noting that could oblige TV stations to present lengthy documents within limited airtime.

The union further criticised the decision's 86-page rationale, pointing out that the NCRTV appeared to engage in detailed judicial-style assessment of a case that has never been heard in court, while the judiciary itself continues to handle numerous SLAPP lawsuits filed by Dimitriadis against journalists—one of which has already been dismissed.

ESIEA warned that the Council's reasoning could set a dangerous precedent for ongoing and future trials involving journalists and news outlets.8 The NCRTV itself has acknowledged that its dependence on ministerial approval for regulatory and staffing matters hinders its capacity to function effectively.9

³Law Number 4779. Art. 33.

⁴The Constitution of Greece, as revised by the parliamentary resolution of May 27th 2008 of the VIIIth Revisionary Parliament, hereafter Greek Constitution, available online at https://www.hellenicparliament.gr/en/Vouli-ton-Ellinon/To-Politeyma/Syntagma/. ⁵ Greek Constitution, Art. 15(2).

⁶ Law 4779/2021, Art. 33 para 2.

⁷Law 4779/2021, Art. 33, para 1.

⁸ Media Freedom Rapid Response (MFRR), Media regulator ESR imposes €90,000 fine on Mega TV following complaint by Grigoris Dimitriadis, Mapping Media Freedom, 19 February 2025, https://www.mapmf.org/alert/32958.

⁹ European Commission, 2025 Rule of Law Report: Communication and Country Chapters, 2025,

https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters en.

This arrangement undermines the authority's independence by restricting its role to largely administrative tasks, while Law 4779/2021 assigns key responsibilities for implementing broadcasting legislation to the competent minister rather than to the independent regulator.¹⁰

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.¹¹

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. ¹² 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 are guaranteed absolute personal and operational independence in the performance of their duties under the Constitution. Members of the NCRTV are expected to be personalities of high standing and social prestige, distinguished by their scientific competence and professional expertise in the legal, academic, or mass media fields. There is no provision for the dismissal of a member.

However, the current legal framework for appointments allows the selection of individuals who lack in-depth knowledge of the media landscape, retirees from unrelated fields (some over 75 years of age), and part-time professionals unable to fully contribute due to limited availability.

Moreover, the appointment process is marked by a lack of transparency, in breach of Article 30(5) of Directive 2018/1808 of the European Union (partially transposed by Law 4779/2021). Consultations between political parties do not guarantee a merit-based selection process, as they lack transparency safeguards such as a public call for applications, clear candidate assessments, and other accountability measures.

Independence of the regulator's members

In selecting its members, the Conference reviews the applicants' CVs and acts in accordance with the guidance of its President and the President of the Parliament. The ruling party has a majority, which gives it control over the process. As a result, the selection of NCRTV members is often subject to political connections. This procedure

Epoliteia, Quo vadis ESR? Μια πρόταση για το μέλλον της Ανεξάρτητης Αρχής, 3 August 2023,
 https://www.epoliteia.gr/prodimosiefseis-epikaira-themata/2023/08/03/quo-vadis-esr-mia-protash-gia-to-mellon-ths-aneksartitis-arhis
 Law 2863/2000, Art. 2 para. 1

¹² Art. 13 & 14 of the Standing Orders of the Greek Parliament.

lacks transparency and accountability.

In September 2023, there were reports¹³ of attempts to interfere in the functioning of the independent authorities of the Hellenic Authority for Communication Security and Privacy (ADAE) and the NCRTV.14

More specifically, Articles 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.¹⁵

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 Solution¹6.

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.¹⁷ The Council of State rejected the appeals of the Athens Bar Association claiming that the Bar "has no legal interest"¹⁸.

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.¹⁹

¹³ "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, available online at https://govwatch.gr/en/skepseis-me-aformi-tin-prosfati-epilogi-ton-melon-tis-adae-kai-toy-esr/.

¹⁴ Kostas Botopoulos, "Ανεξαρτησία προς απόδειξη" (Independence to prove), Syntagma Watch, 29 September 2024, available online (in Greek) at https://www.syntagmawatch.gr/trending-issues/anexartisia-pros-apodeixi/.

¹⁵ Article 1 of Plenary Resolution No. 10826/7268/7-9-2023 (Government Gazette A 148/8-9-2023).

¹⁶ https://www.avgi.gr/koinonia/465762_pros-epanexetasi-ton-thiriodon-prostimon-sta-perifereiaka-kanalia

¹⁷ Mina Moustaka, "Στο ΣτΕ οι αιτήσεις ακύρωσης υπουργικών αποφάσεων για ΑΔΑΕ και ΕΣΡ" (In the Council of Ministers, the applications for annulment of ministerial decisions for ADAE and ESR), 17 June 2024, To Vima, available online (in Greek) at https://www.tovima.gr/2024/05/17/society/sto-ste-oi-aitiseis-akyrosis-ypourgikon-apofaseon-gia-adae-kai-esr/.

Newsroom, "Ολομέλεια ΣτΕ: Απέρριψε τις προσφυγές του ΔΣΑ για ΑΔΑΕ και ΕΣΡ (1641/2024 & 1639/2024). Nomothesia & Nomologia:, 1 November 2024, Daily NB, available online at https://daily.nb.org/nomothesia-nomologia/olomeleia-ste-aperripse-tis-prosfyges-tou-dsa-gia-adae-kai-esr/

¹⁹ 2022 Media Pluralism Monitor, country report for Greece, p. 10.

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 concluded that the 18 vacant positions must be filled. According to the European Commission's 2025 Rule of Law Report on Greece, some of these posts were filled by the end of 2024.²⁰ In 2025, nine new employees joined the NCRTV, all of whom hold administrative roles. However, none of them are expert professionals such as lawyers or political scientists. Moreover, two staff members have since resigned. As a result, the staffing issue remains unresolved.

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.²¹ 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 recorded a budget of €2.3 million, which remained largely unchanged in 2023. 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.²² 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." The agency has its own specialised budget, which is to be used for the implementation of its activities. "4"

Tasks and accountability

The decisions of the regulatory authority used to be public and accessible via the Transparency Portal²⁵, which is the official repository for all acts and decisions of Greek government institutions. Each document is digitally signed and assigned a unique number,

²⁰ European Commission, 2025 Rule of Law Report, cit.

²¹ Law 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, available online (in Greek) at https://www.uaipit.com/uploads/legislacion/files/1423732687 24.Law National Council For Radio And Television And Relevant Authorities And Instruments of The Radio And Television Services Provision Sector (2000) GR.pdf.

²² NCRTV Annual Report 2022, cit.

²³ NCRTV Annual Report 2022, cit.

²⁴ Law No. 2863.

²⁵ See <u>https://diavgeia.gov.gr/en</u>.

thereby ensuring that acts and decisions are not valid unless published online. However, the authority stopped publishing decisions in the portal and now instead supposedly publishes everything on its website. This presents major challenges for researchers trying to find the decisions, as it is very difficult to locate them. Even if someone finds the decisions of 2025, they need to download all of them to see which one is the most recent.

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 and the 2023 report in the first months of 2025. 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.²⁶ 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 State²⁷, 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

²⁵ György Kerényi, "Mandátuma vége előtt távozhat a Médiatanács elnöke" (Media Council President may leave before the end of her mandate), Szabad Európa, October 16, 2020. Available online: https://www.szabadeuropa.hu/a/a-fideszben-gondolkodnak-azon-hogy-meg-mandatuma-vege-elott-lemondjon-posztjarol-karas-monika-nmhh/30896505.html

²⁶ "Megint meghekkelte a Médiatanácsot a Fidesz" (Fidesz has hacked the Media Council again), Népszava, December 12, 2019. Available online: https://nepszava.hu/3059155 megint-meghekkelte-a-mediatanacsot-a-fidesz

²⁷ "Megválasztották a Médiatanács új elnökét és tagját" (New president and members of the Media Council elected), HVG, December 14, 2021. Available online: https://hvg.hu/itthon/20211214 Megvalasztottak a Mediatanacs uj elnoket es tagjat

²⁸ As of September 12, 2025. Source: the authority's website. Available online: https://nmhh.hu/rolunk. Note: The website has not been updated since December 31, 2022.

²⁹ Media Law, Art. 134.

³⁰ The independence of media regulatory authorities in Europe, cit.

³¹ Media Law, Art. 109-110, Ar. 132.

³²https://nmhh.hu/cikk/252844/Orszaggyulesi beszamolo a Nemzeti Media es Hirkozlesi Hatosag Mediatanacsanak 2024 evi teveke nysegerol

the obligation to respect human dignity. The owners of the media sought the annulment of the fines, disputing NCRTV's authority to impose penalties on website owners.²⁸

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.²⁹ The Court of Justice of the European Union ruled that the authority has no legal basis to fine a website for poor content.³⁰

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 decisions which is high.³¹ However, one needs to monitor each case separately to ascertain whether it was reversed. There are no total data publicly available neither from the Council of State nor the authority.

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.

https://www.taxheaven.gr/news/64453/ste-to-esr-den-mporei-na-epibalei-prostima-se-paroxoys-thleoptikoy-periexomenoy-mesw-diadiktyoy

²⁹ Decision of the Council of State, available online (in Greek) at https://tinyurl.com/ymksnwfr.

³⁰https://curia.europa.eu/juris/document/document.jsftext=&docid=301743&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=4922068

³¹ NCRTV Annual Report 2022, p. 37, available online (in Greek) at https://www.esr.gr/wp-content/uploads/EP2022.pdf

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) 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.

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 still 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)³² and the national TV broadcaster ERT.³³

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.³⁴

In line with its mandate, the NCRTV is the authority responsible for supervising the public broadcaster, with the objective of ensuring "the objectivity, equality of conditions and

³² See more at https://www.amna.gr/en.

³³ See more at <u>https://www.ert.gr</u>.

³⁴ Hellenic Broadcasting Corporation, see https://company.ert.gr/etaireia/apostoli-orama-arches-axies/.

quality of the programmes, in accordance with the Constitution".³⁵ According to law 4173/2013 about ERT's operation, the public broadcaster is obliged to submit a report on the transparency of the use of the license fee both to the Institutions and Transparency Committee of the Hellenic Parliament and to the NCRTV during the first quarter of each year.³⁶ This report has never been delivered.

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.³⁷ Concurrently, the same individuals were subjected to surveillance via Intellexa's Predator spyware.

The scandal was brought to light in April 2022.³⁸ 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)³⁹, 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.⁴⁰

A memorandum from the management of ERT was disclosed to the public.⁴¹ 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.⁴² Mitsotakis was photographed in the company of 40 other individuals, in contravention of government-mandated restrictions designed to contain the spread of the pandemic.⁴³

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

³⁵ National Council for Radio and Television, see https://tinyurl.com/bd6fv7fu.

³⁶ https://www.kodiko.gr/nomothesia/document/74666/nomos-4173-2013

³⁷ Tasos 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, https://insidestory.gr/article/aytoi-einai-oi-koinoi-stohoi-eyp-kai-predator?token=xxEuuK4oGS.

³⁸ Tasos Telloglou, Eliza Triantafyllou, "Who was tracking the mobile phone of journalist Thanasis Koukakis?", Inside Story, 11 April 2022, https://insidestory.gr/article/who-was-tracking-mobile-phone-journalist-thanasis-koukakis?token=dXB4bqnxCa

³⁹ News release, Spyware: MEPs sound alarm on threat to democracy and demand reforms, European Parliament, 8 May 2023, https://www.europarl.europa.eu/news/en/press-room/20230505IPR84901/spyware-meps-sound-alarm-on-threat-to-democracy-and-demand-reforms.

⁴⁰ Manos Chorianopoulos, "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, https://www.news247.gr/politiki/apokleistiko-vinteo-glenti-se-spiti-stin-ikaria-me-pano-apo-50-atoma-parousia-mitsotaki/

⁴¹ "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, https://www.efsyn.gr/politiki/280561 thyella-antidraseon-gia-ti-logokrisia-stin-ert-shetika-me-trapezoma-stin-ikari.

⁴² Storm of reactions to the censorship in ERT, cit.

⁴³ Storm of reactions to the censorship in ERT, cit.

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 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.⁴⁴

On 24 June 2025, the management of ERT, unilaterally terminated the collaboration contract with journalist Thomas Sideris over what the journalist claimed was a political motive linked to his reporting on the humanitarian situation in Gaza. ERT management also discontinued and in practice cancelled the broadcasting of the last three episodes of a multi-part radio series Sideris had been producing about the human rights situation in Gaza. The removal of the journalist sparked reactions⁴⁵ of censorship from Greek journalist unions and political parties. No reason was provided for the cancellation of his eight-part radio series by ERT.⁴⁶

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.⁴⁷ 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

48 Greek Constitution, Art. 14.

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 These guarantees are set out in the Greek Constitution⁴⁸, the EU Charter of Fundamental Rights⁴⁹, the 1995 law on private television⁵⁰,

⁴⁵ Panhellenic Federation of Journalists' Unions (POESY), Δημοσιογράφοι όπως ο Θωμάς Σίδερης προπηλακίζονται και απειλούνται για τη δουλειά τους [Journalists like Thomas Sideris are abused and threatened for their work], POESY, 18 April 2024, https://www.poesy.gr/dimosiografoi-opos-o-thomas-sideris-pr/.

⁴⁶ Media Freedom Rapid Response (MFRR), Journalist and filmmaker Tom Sideris removed by ERT management and radio series on Gaza cancelled, Mapping Media Freedom, 26 June 2025, https://www.mapmf.org/alert/33502

⁴⁷ "Επιστολή της ΕΣΗΕΑ προς τη διοίκηση του ΑΠΕ-ΜΠΕ" (Letter from ESIEA to the administration of APE-MBE), 17 November 2022, available online (in Greek at https://www.esiea.gr/epistoli-tis-esiea-pros-ti-dioikisi-to/.

⁴⁹ EU Charter of Fundamental Rights: 'Freedom of the media and pluralism shall be respected', https://fra.europa.eu/en/eu-charter/article/11-freedom-expression-and-information, Art. 11, para. 2

⁵⁰ 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". https://www.kodiko.gr/nomothesia/document/9583/nomos-2328-1995

the 2015 law on licensing of TV channels⁵¹, the law 4173/2013 on the public broadcaster and numerous other legislative instruments.⁵²

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 expertise.⁵³ 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.⁵⁴

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.⁵⁵

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).⁵⁶ Recently enacted legislation pertaining to the "corporate governance of state companies"⁵⁷ 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

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". https://www.kodiko.gr/nomothesia/document/127264/nomos-4339-2015.

⁵² NCRTV decision on media pluralism, 2/2023, https://www.esr.gr/wp-content/uploads/esr odigia 2 2023.pdf
53 Law 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, available online at https://tinyurl.com/w8yw4whv.

⁵⁴ Thodoris Chondrogiannos, "Public service broadcasting placed under the control of the Prime Minister", GovWatch, 18 October 2020, available online at https://govwatch.gr/en/finds/public-service-broadcasting-placed-under-the-control-of-the-prime-minister/.

⁵⁵ "Επίθεση ΣΥΡΙΖΑ στον Μητσοτάκη για τον διορισμό Ζούλα στην ΕΡΤ" (SYRIZA attack on Mitsotakis for appointing Zoula to ERT), Το Vima, 12 August 2019, https://www.tovima.gr/2019/08/12/politics/epithesi-syriza-ston-mitsotaki-gia-ton-diorismo-zoula-stin-ert/

⁵⁶ Dimitris Katsaganis, "Το νέο καθεστώς επιλογής διοικητών στο Δημόσιο" (The new regime for selecting administrators in the State), Capital.gr, 26 October 2023, https://www.capital.gr/oikonomia/3745974/to-neo-kathestos-epilogis-dioikiton-sto-dimosio/.

⁵⁷ Law 4972/2022 on Corporate governance of the Public Limited Companies and the other subsidiaries of the Hellenic Holdings and Property Company [...], available online (in Greek) at https://tinyurl.com/37ssr7sr.

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.

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:

- a) 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 Government⁵⁸
- b) 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.⁵⁹ The broadcaster's principal source of revenue is a contributory tax of €3 per

REVENUE GENERATED FROM THE CONTRIBUTORY TAX LEVIED ON ELECTRICITY BILLS FOR ERT 2020-2023⁶⁰

Year	Amount (€m)
2020	186.99
2021	188.27
2022	190.74
2023	208.15

⁵⁸ Law 5062/2023 on a new system for selecting administrations of public sector bodies, strengthening their effectiveness and other provisions, Art. 12, available online (in Greek) at https://www.hellenicparliament.gr/UserFiles/bcc26661-143b-4f2d-8916-0e0e66ba4c50/12402846.pdf.

⁵⁹ Public Service Media Law.

⁶⁰ ERT, see https://www.ert.gr/dimosia-axia/

month levied on the electricity bills of Greek citizens. ERT also generates commercial revenue through advertising.

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 the model of direct state funding from the budget, which is exemplified by other European broadcasters.⁶¹

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 stipulations⁶², 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 available⁶³, 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." 64

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

⁶¹ Law 4173/2013, Art. 6 para. 3.

⁶² Law 2328/1995 on legal status of private television and local radio, regulation of matters concerning the radio and television market and other provisions, available online at https://www.wipo.int/wipolex/en/legislation/details/1821.

⁶³ See <u>https://tinyurl.com/ywdw4f8b</u>.

⁶⁴ Law 2328/1995, Art. 3.

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.

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". 65

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.⁶⁶

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-Pasithea 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.

Obligations of media service providers in accordance with law 4779/2021, https://www.esr.gr/wp-content/uploads/ypox-parox-yp-mes-epik-12-2022.pdf.

⁶⁶ Law No. 4070/2012 on Electronic Communications, Transportation, Public Works and other provisions, available (in Greek) at https://www.kodiko.gr/nomothesia/document/117878/nomos-4070-2012, Art. 21.

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 advertising⁶⁷ to a wide plurality of media service providers⁶⁸, 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 without the necessary accountability or transparent process.⁶⁹

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.⁷⁰

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.⁷¹

⁶⁸ Law 5005/2022 on prohibition of advertising of public and general government entities in non-certified publications or websites with informative content, available (in Greek) at https://www.kodiko.gr/nomothesia/document/847353/nomos-5005-2022, Art. 22.

⁶⁹ Karyotakis, Minos-Athanasios. "Exercising control in media during Covid-19: the "Stay at Home" campaign on Twitter in Greece." Humanities and Social Sciences Communications11, no. 1 (2024): 1-9.

⁷⁰ Karyotakis, "Exercising control...", cit.

⁷¹ "Υπόθεση Λίστας Πέτσα • Το Vouliwatch προσφεύγει στο ΕΔΔΑ" (Petsas list case • Vouliwatch appeals to the ECtHR), 18 October 2023, see https://vouliwatch.gr/actions/article/lista-petsa-edda.

The e-Pasithea platform⁷² went online in September 2024 but took almost a year to become fully operational. It provides a range of digital services, including the electronic submission of advertising expenditure reports and applications for the approval of public sector advertising programmes. As of September 2025, the platform offers access to all approval decisions for the year 2024 (including application number, year, agency, approval number, approval date, decision in PDF format, and the corresponding hyperlink to the publication in DIAVGEIA) as well as approval decisions for 2025, which are still being processed.

Some services of the platform are designed for use by public sector departments, which are required to upload information on state advertising. Specifically, public bodies whose annual communication plan has been approved must submit, in the year following the completion of the programme, statements via the e-Pasithea application detailing the amounts they spent in the previous year on all forms of advertising services and on broadcasting or registration contracts. These amounts are itemised for each economic operator that provided advertising or related services to the public sector. In this context, the submission of financial statements for 2024 by public and wider public sector entities, publicly accessible under the "financial statements" field, is still being finalised, while the corresponding data for 2025 will be submitted in 2026.

The e-Pasithea platform also provides access to the Online and Print Registers, as well as lists of media outlets (radio and television stations) maintained by the National Broadcasting Council. However, this access is restricted to public and wider public sector bodies and is not available to the general public.

E-Pasithea 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-Pasithea 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.

Monitoring state advertising spending

It is not within the remit of the NCRTV to monitor the allocation of state advertising, but there is a chance this will change with the proposed law. The e-Pasithea platform is designed to provide state advertising reports, but these have not been made public in recent years.

⁷² See <u>https://media.gov.gr/e-pasithea/</u>.

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)⁷³, 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 still no obligation on the part of the media to disclose advertising revenues. This also is something that might change with the new law. The only exception is related to banking institutions. Following the recapitalisation of Greek banks, the relevant legislation⁷⁴ 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, Vouliwatch⁷⁵ (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.

⁷³ See https://eaadhsy.gr/index.php/en/hsppa/mission-responsibilities.

⁷⁴ Law No. 4374/2016.

⁷⁵ See more at https://vouliwatch.gr/about/en.

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 often function as vehicles for promoting specific narratives or supporting political parties, rather than serving as platforms for public interest reporting and holding power to account. This trend is reinforced by the fact that media in Greece is generally not a profitable business. An analysis of the financial statements of the country's largest television stations (SKAI, MEGA, OPEN, ALPHA TV, Star Channel, ANT1, NICKELODEON, RISE TV, MACEDONIA TV, ACTION 24) shows that in 2024 these broadcasters collectively owed €350 million to banks.76 The extent of direct interference by media owners has varied across outlets 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.

Solomon, Who controls the media in Greece?, Investigation, 21 November 2022, https://wearesolomon.com/mag/format/investigation/who-controls-the-media-in-greece/.

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).⁷⁷

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.

The Register of Beneficiaries, maintained by the General Secretariat for Information Systems, could serve as a valuable tool for journalistic investigations. It is a central digital database in which the ultimate beneficial owners of companies, along with any relevant

⁷⁷ The 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).

changes, must be recorded.⁷⁸ However, although the register is operational, it is not accessible to the public. While the European Court of Justice provides an explicit exemption⁷⁹ granting journalists access even where public access is blocked, the Ministry of Finance continues to restrict use of the register to the competent auditing authorities.

State funding

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

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

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 nonlinear 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.

This media registry is a step forward for transparency; however, it neither covers all online media nor establishes an obligation for them to register. The only incentive for outlets to join is that registration is the sole pathway to receive state funding. Online media that choose not to register and disclose their beneficial owner are free to remain outside the system. As of the date of this report, 567 online media outlets were registered. When asked about the total number of online media operating in Greece, the Greek Secretariat General for Communication & Media responded that the agency "does not keep records of the percentage of electronic media at national level that are registered in the Register".

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.

⁷⁸ https://wearesolomon.com/mag/format/investigation/who-controls-the-media-in-greece/

⁷⁹ European Union, Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024 on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 (Text with EEA relevance), Official Journal of the European Union, L 202, 19 June 2024, ELI: http://data.europa.eu/eli/dir/2024/1640/oj.

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 5005/2022.⁸⁰ In the case of television and radio, the responsibility for such a database falls upon the NCRTV, as set forth in Law 2328/1995.⁸¹

Assessment of media market concentrations

The Constitution prohibits82 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. 3592/2007⁸³, which is complemented by Law No. 3959/2011 (the Greek Competition Law).⁸⁴

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.

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.⁸⁵

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, changes in media ownership become apparent to the public either through journalists specialising in media and financial news or with a significant delay, sometimes years, from the NCRTV. One reason for this is the authority's lack of personnel.

⁸⁰ Law 5005/2022 regarding the enhancing of publicity and transparency in the printed and electronic press, available online (in Greek) at https://www.kodiko.gr/nomothesia/document/847353/nomos-5005-2022.

⁸¹ Law 2328/1995, available online (in Greek) at https://www.esr.gr/wp-content/uploads/nomos 2328 1995.pdf.

⁸² Greek Constitution, Art. 14, para 9.

⁸³ Law No. 3592/2007 of 2007 on Concentration And Licensing of Mass Media Enterprises And Other Provisions, available online at https://www.wipo.int/wipolex/en/legislation/details/6975.

⁸⁴ Law 3959/2011 on the Protection of Free Competition in English (codified Jan 2022), available online at https://www.epant.gr/en/legislation/protection-of-free-competition.html.

⁸⁵ "Ποιος είναι ο αγοραστής του 50% του Alpha TV" (Who is the buyer of 50% of Alpha TV?), Euro2day.gr, 1 July 2022, https://www.euro2day.gr/news/enterprises/article/2140273/poios-einai-o-agorasths-toy-50-toy-alpha-tv.html.

Another is that, although media outlets are legally obliged to provide the required data to the Council, they often fail to comply. At the same time, while the Council has the power to impose administrative penalties on non-compliant media, it tends to refrain from doing so.

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.

As noted in a monitoring media pluralism report⁸⁶, "Greece lacks a dedicated framework to evaluate the impact of media mergers on media pluralism, further enabling consolidation and threatening diversity of voices". In addition, there is a significant lack of reliable data on newspaper circulation, television ratings, and online media audiences. In particular, newspaper circulation figures remain unavailable due to the unresolved situation with the Argos press distribution agency, owned by Evangelos Marinakis.

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 (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.⁸⁷ 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.⁸⁸

⁸⁶ Centre for Media Pluralism and Media Freedom (CMPF), Monitoring Media Pluralism in the European Union, 2023–2024. Country report: Greece, European University Institute, 2024, https://cadmus.eui.eu/entities/publication/54e739b2-d5c7-42cd-af77-f16c38fde485.

⁸⁷ Decision 1163/2022 of the Hellenic Competition Commission, available online (in Greek) at https://www.epant.gr/files/2018/apofaseis/EA-659-2018-DEA-1163-2022-ALTER-EGO-site.pdf.

⁸⁸ "Στην Alter Ego Media τα εμπορικά σήματα της «Ελευθεροτυπίας»" (The trademarks of Eleftherotypia go to Alter Ego Media), In.gr, 4 March 2024, https://www.in.gr/2024/03/04/plus/stin-alter-ego-media-ta-emporika-simata-tis-eleytherotypias/.

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 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 recommendations were first published in November 2024. Since then, the structural weaknesses of Greece's media regulatory framework have largely persisted, and no substantial reforms have been introduced. As a result, most of the recommendations remain relevant as of September 2025. 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.

Recommendation added in 2025

 It is recommended that the NCRTV become financially independent from the state by securing its funding through reciprocal fees imposed on supervised entities for the commencement of radio and television services and, more broadly, for supervisory activities.

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.

Recommendation added in 2025

- It is recommended to ensure transparency in the selection process of NCRTV members. This should include a public call for expressions of interest by the Speaker of the Hellenic Parliament, a recommendation by the Speaker, hearings of proposed candidates before the Committee on Institutions and Transparency, and the formulation of an opinion and decision by the Conference of Presidents.
- It is recommended that NCRTV members hold full-time and exclusive employment. The current system, which allows part-time arrangements, creates a "two-speed" structure that undermines the Council's effectiveness.

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?

The recommendations were first published in November 2024. Since then, the political and structural vulnerabilities of Greece's public service media have remained largely unchanged, and no significant reforms have been undertaken. As a result, the recommendations remain relevant as of September 2025.

• 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 the NCRTV fulfills its role and guarantees compliance with legal standards for editorial independence, balanced coverage, and fairness. The authority 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 recommendations were first published in November 2024. Since then, the lack of transparency and accountability in the allocation of state advertising and subsidies has persisted, with no meaningful reforms introduced. As a result, the recommendations remain relevant as of September 2025. 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?

The recommendations were first published in November 2024. Since then, ownership concentration and the influence of politically connected oligarchs in the media sector have remained key concerns, with no substantive reforms introduced to curb these risks. As a result, the recommendations remain relevant as of September 2025. To align more closely with EMFA's provisions on media pluralism and ownership transparency, the following actions are recommended:

- 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. ⁸⁹

• 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.

⁸⁹ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32022H1634

MEDIA CAPTURE MONITORING REPORT: GREECE

NOVEMBER 2025

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

The MFRR is organised by a consortium led by the European Centre for Press and Media Freedom (ECPMF) including ARTICLE 19 Europe, the European Federation of Journalists (EFJ), Free Press Unlimited (FPU), the International Press Institute (IPI) and Osservatorio Balcani e Caucaso Transeuropa (OBCT).

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