

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN MEMBER STATES AND CANDIDATE COUNTRIES IN 2023

Country report: Hungary

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Research Project Report

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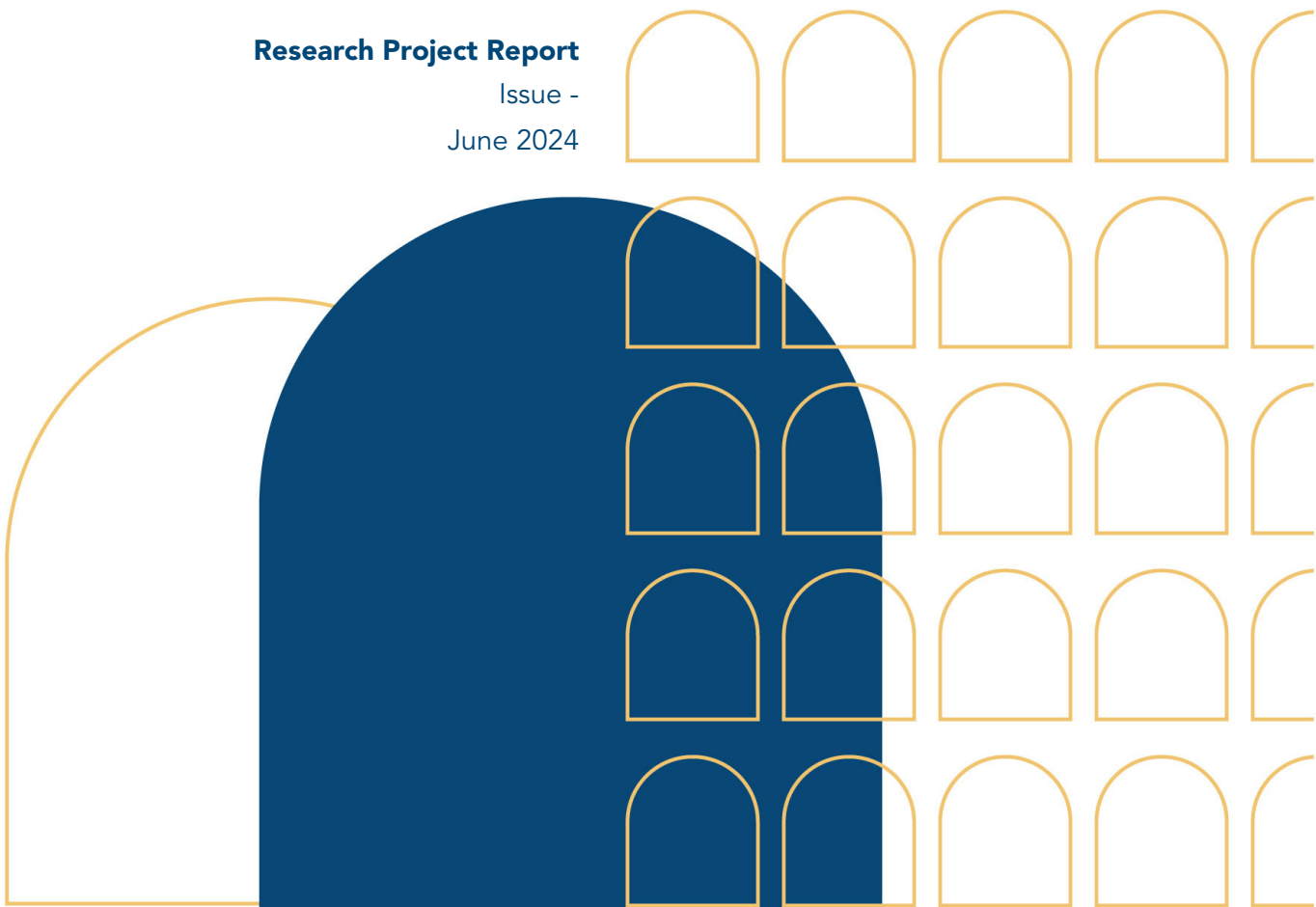


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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool that is designed to identify potential risks to media pluralism in the Member States of the European Union and in Candidate Countries. This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2023. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This year a part of the MPM has also been piloted in Bosnia and Herzegovina and Moldova. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological notes

• Authorship and Review

The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports. The research is based on a standardised questionnaire that was developed by the CMPF.

In Hungary the CMPF partnered with Konrad Bleyer-simon (European University Institute), Gabor Polyak (Eötvös Loránd University), Agnes Urban (Corvinus University of Budapest), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert. Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

• The Digital Dimension

The Monitor does not consider the digital dimension to be an isolated area but, rather, as being intertwined with the traditional media and the existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digitally specific risk scores, and the report contains a specific analysis of the risks that related to the digital news environment.

• The Calculation of Risk

The results for each thematic area and Indicator are presented on a scale from 0 to 100%.

- Scores between 0% and 33%: low risk
- Scores between 34% and 66%: medium risk

- Scores between 67% and 100%: high risk

With regard to the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

• Methodological Changes

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2024 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2024, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

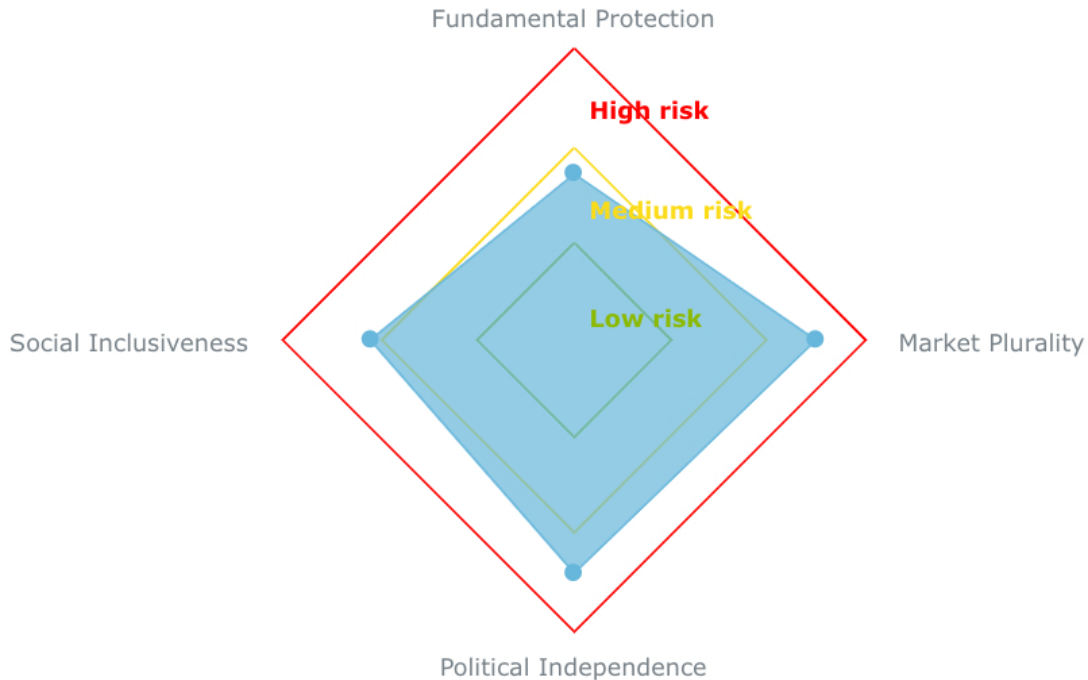
2. Introduction

- **Population:** According to the national census of 2022 (KSH, 2023a), Hungary had a population of 9,604,000 people, which is a 3.4% decrease compared to the census of 2011.
- **Languages spoken:** Hungary is mostly a monolingual country, 99% of the population speaking Hungarian as their first language.
- **Minorities:** From an ethnic point of view the country is mostly homogeneous. Act CLXXIX of 2011 on the rights of nationalities lists 13 acknowledged nationalities in Hungary: Armenian, Bulgarian, Croatian, German, Greek, Polish, Roma, Romanian, Ruthenian, Serbian, Slovak, Slovene and Ukrainian. The largest ethnic minority is the Roma. According to the census of 2022, 2.5 percent of the population (210,000 people) reported being part of the Romani community (KSH, 2023b), at the same time some researchers believe their proportion to be much higher, up to 8 percent. The census also listed German (143,000), Slovak (30,000), Romanian (28,000) and Ukrainian (25,000) minorities. The number of people who fled to Hungary after Russia's attack on Ukraine, and are still residing in Hungary, is not known, it is expected to be between 15,000 and 65,000. Officially, 41,000 people applied for asylum, but there is no information about the number of people with dual nationality (Hungarian-Ukrainian) who fled after February 2022 (Takács, 2024).
- **Economic situation:** According to the European Commission's Economic forecast for Hungary, real GDP was estimated to have contracted by 0.8% in 2023, with 17% year-on-year inflation. Prices started stabilising by the end of the year, and in 2024, inflation is expected to decrease to 4.5% while the GDP will most likely expand by 2.4% (European Commission, 2024). In the fourth quarter of 2023, the unemployment rate in Hungary was 4.2%, 0.6 percentage points higher than the year before (KSH, 2024a), the employment rate was 74.8%, 0.4 percentage points higher than the year before (KSH, 2024b).
- **Political situation:** Hungary is a parliamentary democracy, but analysts and researchers caution for the past decade about a trend of democratic backsliding in the country, which led some experts and political actors to label the country a hybrid regime or a competitive authoritarian system, rather than a full-fledged democracy (this was reiterated by the European Parliament decision T9-0324/2022). From 2010 the right-wing/populist Fidesz- KDNP (originally, Alliance of Young Democrats, now Hungarian Civic Alliance - Christian Democratic People's Party) party alliance has been in power, winning four national elections consecutively in 2010, 2014, 2018 and 2022. In all four cases, the government gained a two-third majority in Parliament. The Prime Minister has been since 2010 Viktor Orbán. Following a set of primaries in 2021, most opposition parties formed a united front for the April 2022 national election. While some polls in late 2021 predicted a close race, Fidesz got 54% of the votes on party lists and won in 87 out of the 106 constituencies on 3 April 2022, thereby gaining another 2/3 majority. In addition, the extreme far-right Our Homeland Movement (Mi Hazánk Mozgalom, a party that is on many issues supportive of PM Viktor Orbán's government) has also managed to pass the 5% threshold and is represented with six members in Parliament. There was no election in 2023, but there will be municipal and European elections in 2024. In early 2024, president Katalin Novák had to resign after scandal broke about a presidential pardon given to a person involved in covering up child sexual abuse, the new president of Hungary is Tamás Sulyok, the former president of the Hungarian Constitutional Court.

- Media market:** The Hungarian media market consists of a mix of public and private media. Since the early 1990s, the market used to be characterised by a high level of political parallelism and “party-colonisation” (Bajomi-Lázár, 2013). As the political right gained significant power in the past years, most market actors, even privately-owned, formally independent outlets are controlled largely by the governing party. Due to this dichotomy, we differentiate in the report between pro-government (government-aligned) media and independent media – taking into consideration that many forms of dependency can exist (market, owner, audience, etc.) “independence” in this context refers to independence from the government. Even among outlets independent from the government, we find media that have or used to have financial connections to political actors – through state advertising, sponsorships or ownership. Trust in news media and journalism is among the lowest in Europe, according to the Digital News Report (2023) only 25% of respondents trust “most news most of the time” (DNR, 2023); and the audience is polarised, meaning that a sizable segment of media audiences consume media according to their political preferences (Polyák-Urbán-Szávai, 2022). Internet penetration in Hungary is high at 92.5% (Statista, 2024a), and the proportion of regular internet users is 89% (KSH, 2023c). Online media and social media (intermediaries) are the most important information sources, but television still plays a key role in the news ecosystem (DNR, 2023). There are 7.5 million social media users in the country, out of them 7.4 million use Facebook (5.8 million Messenger) and 2.9 million Instagram (Facebook is seen as dominant with a 91% social media market share); there are 1.3 million daily TikTok app users and 1.9 million daily real YouTube app users (Statista, 2023a), in the past, it was shown that 83% of internet users regularly visit Youtube (Statista, 2022); 37% of adult members of generation Z use TikTok, but the usage rate is much lower in older generations (Statista, 2021); other social media platforms, such as X (Twitter) are not commonly used. It also has to be highlighted that the Hungarian media sphere has cross-border characteristics, given that all neighbouring countries of Hungary are home to significant Hungarian-speaking minorities – many of whom have a strong emotional connection to Hungary and hold Hungarian citizenship as well. The PSM considers reporting on Hungarian communities abroad one of its tasks, as can be seen, among other things, on the PSM Public Service Codex’s emphasis on the coverage of the Carpathian Basin (which refers to historical Hungarian territories which still have significant Hungarian speaking populations) (Közszolgálati Kódex, 2016). The largest Hungarian-speaking population can be found in Romania, followed by Slovakia. These countries have a significant number of Hungarian language publications (for Romania, see the Global Media Finances Map, 2024). Some independent outlets have editions focusing on the Hungarian community in Romania (Transylvania), such as Transtelex and Átlátszó Erdély. In Slovakia, some of the most important media, like Deník N and the public service media have their own Hungarian language editions. According to news media reports and investigations, the Hungarian government has captured many Hungarian-language media in the Carpathian Basin, including in Romania, Serbia and Slovenia (see Keller-Alánt, 2020a,b,c & Sipos, 2022).
- Regulatory environment:** The Hungarian media’s main regulatory body is the Media Council, a formally autonomous decision making body within the convergent regulatory body, the National Media and Info-communications Authority (NMHH). The Media Council is guarding over the rights and stipulations laid down in the Media Act (Act CLXXXV of 2010 on Media Services and on the Mass Media) and the Press Freedom Act (Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content). In 2023, the Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty) was passed. The law creates the Office for the Protection of Sovereignty, which will investigate, among other things, foreign funding provided to the media – and is seen as an instigator of public stigmatisation and coordinated action by other state agencies, including the intelligence services.

3. Results of the data collection: Assessment of the risks to media pluralism

Hungary: Media Pluralism Risk Areas



JS chart by amCharts



The year 2023 did not lead to significant changes in Hungary's media landscape. The risk scores of the four areas are the same as last year: medium risk for Fundamental Protection (57%) and high risk for Market Plurality (83%), Political Independence (80%), and Social Inclusiveness (70%). At the same time, some developments towards the end of the year already imply possible increases in risks in the future. Freedom of information will be further limited due to recent legal amendments, and with the proposal and enactment of the so-called Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty), observers expect increased pressure on independent newsrooms; some pro-government media's decision to leave the Hungarian Newspaper Publishers' Association implies a further decrease in the respect of self-regulation; while the election campaigns and a scandal that led to the resignation of the President of Hungary may trigger smear campaigns against independent journalists or lead to other forms of pressure. As such, the erosion of protections to independent media are expected to go on.

The deterioration of media freedom and pluralism in Hungary started in late 2010, when Viktor Orbán's (newly elected) government passed its new media laws, and in turn, Hungary's media landscape started registering a number of newly emerging problems related to media freedom and pluralism. As the Media Pluralism Monitor (MPM) country reports of the past years show, the risks have been steadily increasing in the country due to restrictive regulation and increasing interference in the media market by the government and government-aligned actors. The laws concerning media are increasingly ambiguous, access to information is made harder, while the media market is distorted by media capture through ownership by government-aligned owners and by the unfair allocation of state advertising – just to name a few examples. In April 2024, a journalistic investigation revealed that a Hungarian state capital fund and a government-

aligned Hungarian businessman invested in the international *Euronews* channel in 2022, potentially increasing the Hungarian government's influence abroad (Pethő et al. 2024), Hungarian investors are also active in the media markets of Slovenia and North Macedonia (Kucic et al., 2020).

This year's assessment focuses mainly on new developments, a detailed description of the legal developments of the last decade, as well as the legal and regulatory environment can be found in the MPM 2023 country report. Part of the report's legal assessment is based on published pieces of work on Hungarian media regulation by one author's work, mainly in the context of Mérték Media Monitor (see Polyák, 2015; Mérték, 2019a; Mérték, 2021a; Mérték, 2021b, Helsinki, 2024). We mention developments of the year 2024 in the report, but they are not included in the risk-assessment. We will highlight in the text that foreign grants are an important source of revenue for independent media, including local outlets; in this context, it has to be disclosed that authors of this report are involved in the management of the Free Media Grant Program (provided by the US Embassy in Budapest), while the Centre for Media Pluralism and Media Freedom (CMPF) is part of the Local Media for Democracy (LM4D) consortium, that provided financial support to local media outlets in the EU, including in Hungary.

The European Media Freedom Act (EMFA), which is to become part of Hungarian law, deals with a number of issues that are also in the Hungarian media sphere, among other things, the lack of independence of the public service media, the misuse of state advertising as an opaque state subsidy, high concentration in the market or the surveillance of journalists. As such, there is some debate about the regulation among policymakers and scholars. The Hungarian National Assembly sent a reasoned opinion (OE-42/619-1/2022) to the European Commission objecting to the EMFA, due to concerns related to the "legal basis of the Proposal for Regulation, the lack of Union competence in certain fields of media as well as the form of the legal instrument." The argument was also reiterated by high-ranking representatives of the Hungarian media regulator: Koltay & Nyakas (2023) wrote that the EMFA would violate "the principle of subsidiarity and the sovereignty of the member states". The Hungarian government was the only one in the EU that voted against the compromise text of the EMFA.

In a dedicated issue of the media studies journal *Médiakutató*, experts (many of whom share the values of the regulation) pointed at possible weaknesses of the EMFA, in the context of Hungary. The Hungarian government's constitutional majority and its attention to codifying its measures into law made sure that formally Hungarian media regulation complies with many requirements of the EMFA. At the same time, it was argued that the EMFA's emphasis on transparency might be ineffective in Hungary, and the regulation itself may, in most cases, only start conversations, but cannot be used to enforce changes (see, for example, Bayer, 2023). Cseres (2023) writes that competition control is one of the few areas where the EMFA can apply hard rules, but it is exactly the Commission that previously made it possible that certain undertakings can be considered of national interest and as such be exempted from the regulation (as in the case of the case of the pro-government media conglomerate KESMA, the Central European Press and Media Foundation – CEPMF). Art. 21(4) of the Council Regulation (EC) No 139/2004 of 20 January 2004 on the control of concentrations between undertakings (the EC Merger Regulation) allows Member States to "protect legitimate interests", adding that "[p]ublic security, plurality of the media and prudential rules shall be regarded as legitimate interests". Polyák (2023) argues that the text of the EMFA is too vaguely phrased to be enforceable, as part of national law, without additional interpretation and adds that measures to protect the freedom of media and journalists cannot work in an environment in which media workers willingly support the governing party with their work.

While there have been very few developments in 2023 that would have affected the scores, a new threat emerged to journalism, in the form of a high number of DDoS attacks that were reported on independent newsrooms (IPI, 2023), and a number of pro-government media decided to end their membership in the Hungarian Newspaper Publishers' Association (MLE), signalling a further weakening of self-regulatory bodies. In regards media regulatory bodies, transparency of ownership and journalists' protections, the following observations can be made:

- **Media regulatory authorities and bodies:** The Media Act of 2010 asserts the independence of the national regulator, the National Media and Info-communications Authority (NMHH) and its administrative organ the Media Council; as such, the election of members is formally a parliamentary procedure. However, in practice, all personal decisions in the Council are made by the governing party in Parliament. The head of the NMHH is appointed by the President of the Republic on a proposal from the Prime Minister, and acts also as the head of the Media Council. The current president of the NMHH and head of the Council is András Koltay who was elected with a 9-year term. The European Audiovisual Observatory's publication "The Media Regulatory Authorities in Europe" mentioned deficiencies in the Media Council's independence, pointing out that "vague and unfounded application of the law exemplified non-compliance with rule of law requirements and insufficient protection of fundamental rights of citizens". It further mentioned that "decisions regarding radio frequency tenders were rendered without debate or opposing votes" (European Audiovisual Observatory, 2019).
- **Transparency of media ownership and governmental interference:** There are no detailed rules on transparency in the ownership structure of media companies. Transparency is partly ensured by publicly accessible registers kept by the media regulator NMHH, but there are no requirements to disclose the ultimate owners. Political or governmental influence can often be observed based on media ownership – a prime example is KESMA (the Central European Press and Media Foundation – CEPMF, established in 2018), which is the largest media conglomerate in Hungary, possessing nearly 500 news outlets (about the foundation and the associated risks, see Brogi et al., 2019). In December 2023, the Hungarian government was criticised internationally for passing the so-called Sovereignty Protection Act which would create the so-called Sovereignty Protection Authority, a body tasked with identifying recipients of foreign funding that are suspected of undermining Hungary's national sovereignty, label them, and even suggest that authorities launch criminal or administrative investigations (CPJ, 2023) – this law will be briefly assessed later in the introduction.
- **Framework for journalists' protection:** Many Hungarian journalists work under precarious conditions; Hungarian laws do not include any regulation against the online harassment of journalists, nor is there a framework against Strategic Lawsuits Against Public Participation (SLAPPs). While physical violence against journalists hardly ever occurs in Hungary, online harassment is common, especially against female journalists (Botás, 2021 and Rutai, 2021). A journalist of Merce.hu received several threatening phone calls this year, following her coverage of a far-right rally (MAPMF, 2023a). The use of the Pegasus spyware against investigative journalists, that was uncovered in 2021 but still not dealt with by authorities, is an extreme intrusion into their private sphere, an interference with journalistic work, and can have a significant chilling effect on journalistic sources.

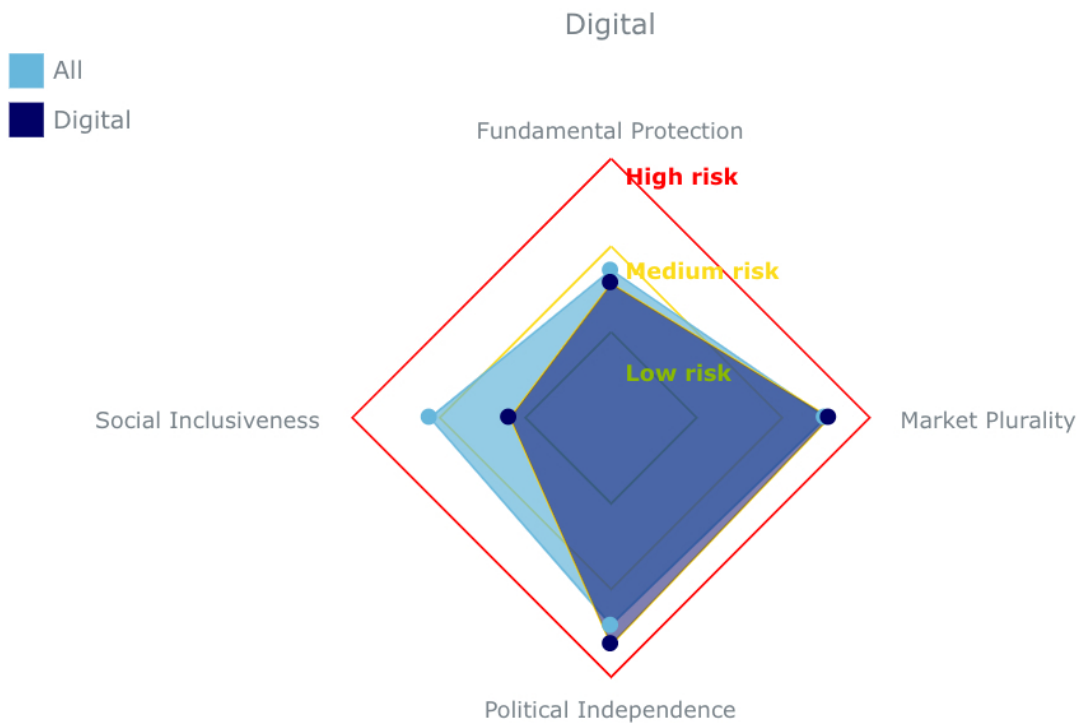
It is important to highlight that the adoption of the so-called Sovereignty Protection Act in 2023 is a major step in the government's fight against independent media and journalism critical of authorities – as it triggers smear campaigns (equating their work with treason) and targets an important revenue source of independent media and civil society (grant funding). The law (which was not yet considered in the data collection, as it was passed at the end of the year) contains deliberately vague definitions, does not specify to whom it applies and lacks clear procedural rules.

A similar legislation adopted in 2017 (Act LXXVI of 2017 on the Transparency of Organisations which receive Support from Abroad; “the Transparency Law”) still explicitly identified foreign funding as a reason for the organisations concerned to be listed in a separate register. The Court of Justice of the European Union in 2020 (Case C-78/18) found this legislation to be in infringement of European law. (In that case, the law had limited effect on the work of journalists and newsrooms, in part because the law had no clear connection with journalism, see Bleyer-Simon, 2022). However, the law on the protection of sovereignty no longer restricts the activities of foreign-funded organisations. Although the Office for the Protection of Sovereignty created by the law will not impose sanctions, it will be the main instigator of public stigmatisation and coordinated action by other state agencies, including the intelligence services. Among other things, the Office is tasked with uncovering and investigating activities aimed at manipulation and disinformation in the interests of other states and foreign entities or organisations and individuals, as well as activities aimed at influencing the democratic debate and state and societal decision-making processes if they may violate or threaten Hungary's sovereignty (the Hungarian government sees the risk of foreign interference coming from the United States and Western Europe). This is an obvious threat to the functioning of the media and journalists as well as civil society organisations, but also to researchers and individuals. The agency can also obtain intelligence data. The law does not provide for sanctions, but there is no legal remedy against the annual report of the Office for the Protection of Sovereignty, which can stigmatise anyone. According to the Venice Commission's opinion of March 2024, the Office for the Protection of Sovereignty should be abolished and the rules of the law should be much clearer (Venice Commission, 2024).

To sum up, there are numerous risks in the Hungarian media environment and improvements are rarely observed. Following the detailed assessment of the state of media pluralism related to the MPM's four areas, we will provide some recommendations in the conclusion that could help overcome some of the current challenges the Hungarian media system, media workers and audiences are facing.

Focus on the digital environment

Hungary: Media Pluralism Risk Areas



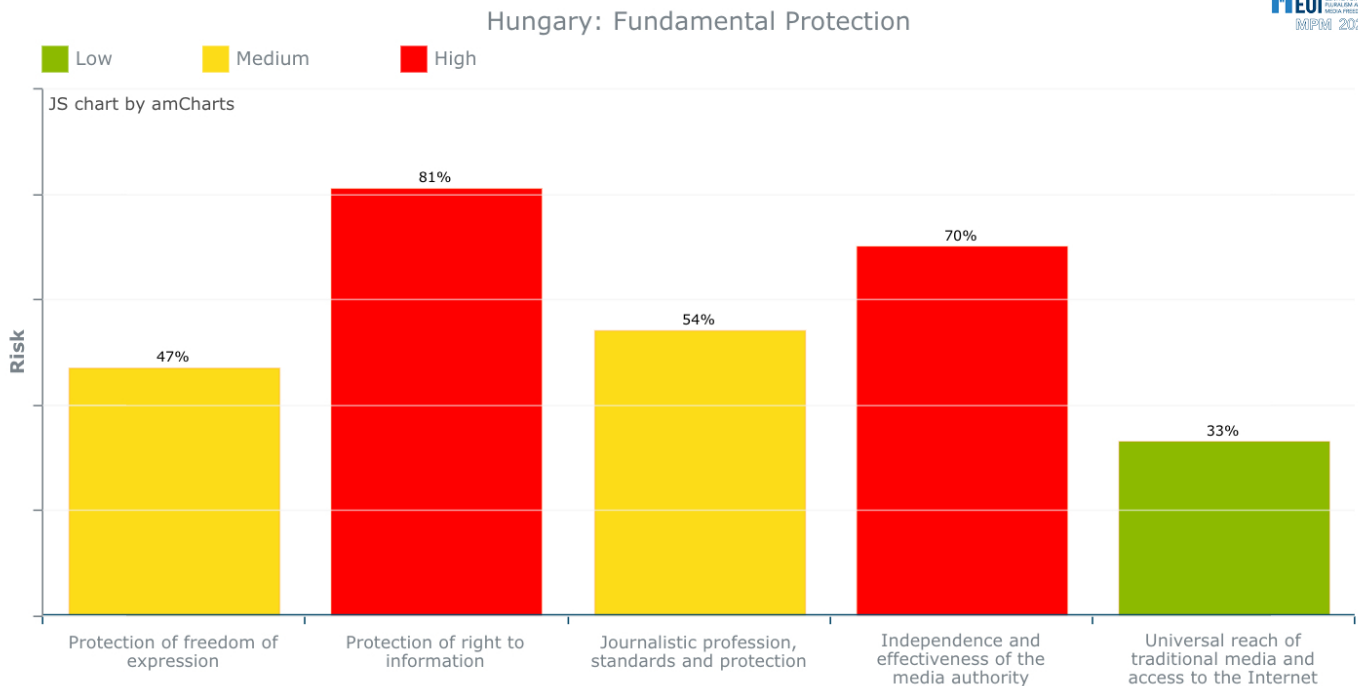
JS chart by amCharts

MEU CENTRE FOR MEDIA PLURALISM AND MEDIA FREEDOM
MPM 2024

Disinformation and hate speech remain problems in the digital environment – but they are not exclusively online phenomena, given that government-aligned actors are oftentimes sources or amplifiers of these messages through traditional media. Journalists, and especially female journalists, are often targeted by online harassment. The International Press Institute estimated that at least 40 independent news media outlets were targets of Distributed Denial of Service (DDoS) attacks in 2023, in many cases the websites were down for several hours (IPI, 2023). There have been discussions in the press about online platforms' arbitrary decisions to block certain pieces of content or deplatform certain actors (OJIM, 2023a).

3.1. Fundamental Protection (57% - medium risk)

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



The area of **Fundamental Protection** scored medium risk at 57%. As last year, the two highest scoring indicators were the Protection of right to information and the Independence and effectiveness of the media authority – both high risk. Some problems that need to be highlighted: the process of obtaining information from official sources is still burdensome for journalists, newsrooms encountered a high number of DDoS attacks, the Whistleblower Directive’s transposition into national law doesn’t provide sufficient protection, and the national regulator is under governmental control.

Protection of freedom of expression (47% - medium risk)

The text of the Fundamental Law (Constitution), which entered into force in 2011, includes freedom of expression and freedom of the press (Article IX), in line with European human rights documents and building on previous decisions of the Hungarian Constitutional Court. Hungary ratified the International Covenant on Civil and Political Rights and the European Convention on Human Rights without reservations. However, Hungary has shown serious shortcomings in enforcing the rulings of the European Court of Human Rights. The Hungarian Helsinki Committee cites data from the European Implementation Network (EIN), which shows that Hungary has not yet enforced 81% of judgments in leading cases between 2011 and 2021 (Magyar Helsinki Bizottság, 2021). The criminal law provisions on defamation and libel are still not accompanied by a mature case-law which allows the limits of freedom of expression to be clearly defined in all cases, and the criminalisation of hate speech is particularly problematic and has not been the subject of clear practice since the 1990s. On a positive note, following a change in the Criminal Code (226. § (3)) in May 2023, a defamatory statement will not be considered a criminal offence if it is made “within a scope of discussion of public affairs and is committed by means of a press product or media service.”

unless the statement is “aimed at an obvious and seriously humiliating denial of the victim’s human dignity” (See CPJ, 2023b and TASZ, 2023a). There are increasing concerns about the independence of the judiciary and the Public Prosecutor’s Office (see: Helsinki, nd.).

Protection of right to information (81% - high risk)

Freedom of information is guaranteed by the constitution (Article VI), and the detailed rules for access to data of public interest are laid down in Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information. At the same time, since 2015, access to data of public interest has been severely restricted (a detailed description can be found in last year’s assessment). While we reported some positive developments last year, due to processes commenced by the European Commission, by now, further deterioration was observed, as the Parliament amended the regulations relating to accessibility of public interest information in December 2023 without any previous consultations. The amending provisions, proposed by the Parliament’s Legislative Committee, define new legal grounds to refuse freedom of information requests, exempt state owned enterprises from transparency requirements in relation to foreign investments and external relations for a period of 10 years, and enable the Government to keep its resolutions secret for a maximum period of 20 years commencing on the date of issuance of the resolution. These changes will take effect in 2024.

In 2023, the investigative outlet *Átlátszó.hu* was forced by prison authorities to stop interviewing a high profile prison inmate, even though the interview was previously authorised. The authorities also forbade the publication of the parts of the interview that were already recorded (*Átlátszó*, 2023). A request to interview another inmate was refused by the authorities (Szalay, 2023a). *Átlátszó* appealed the case to the European Court of Justice (Tarr, 2023).

With 2 years of delay, Hungary transposed the EU Whistleblowing Directive in 2023 by the adoption of Act XXV of 2023. Nevertheless, an analysis by the NGOs Hungarian Civil Liberties Union (HCLU or TASZ), K-Monitor and Transparency International Hungary reveals that the legislation only marginally meets anticipated standards, fails to put adequate safeguards into place for individuals who approach the media, and contravenes European Union legislation (For details, see the joint assessment of the new whistleblower legislation by the Hungarian Civil Liberties Union, K-Monitor and Transparency International Hungary: K-Monitor, 2023). In the context of media freedom, a major shortcoming is related to the fact that communications to the press are not covered by whistleblower protection. The only protection available to whistleblowers turning to the news media is the protection of sources under the Press Freedom Act, which is only guaranteed if invoked by the journalist (Helsinki, 2024).

Journalistic profession, standards and protection (54% - medium risk)

The Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content highlights in Art. 8 that self-regulatory bodies play a role in regulation and the application of the media law. In May 2023, the NMHH organised a technical workshop titled *Partners in Regulation*, which hosted representatives of several “co-regulatory contract partners”. At the same time, professional associations are seen as weak in guaranteeing editorial independence and respect for professional standards, they rarely take ethical positions, and even if they do, experts point at a lack of transparency and arbitrariness in the procedures. The lack of respect for self-regulation was made clear again when pro-government media left the Hungarian Newspaper Publishers’ Association (MLE), after it addressed a letter to the Hungarian President Katalin Novák, asking her not to sign the Sovereignty Protection Act (Helsinki, 2024). The publishers that left the

association asked the Media Council to withdraw MLE's contractual licence (Czinkóczi, 2023).

Journalistic salaries are not competitive, according to editors and media managers we asked about working conditions in the media in Hungary. While there are significant differences between newsrooms, senior journalists' salaries are often below the average net salary in the country. While there is no research on freelancers, it is believed that their working conditions are especially precarious.

Physical attacks on journalists are not common (in 2023, a security guard damaged the camera equipment of a television team and a film director assaulted a film critic who gave his movie a bad review). A journalist of news portal *Mérce.hu* received several threatening phone calls after covering a far-right event. The journalist filed a complaint and police questioned a man as a suspect (MAPMF, 2023a). As in previous years, it can be highlighted that the online bullying and harassment of journalists (often of a sexual nature) is common, especially in the case of female journalists (Tófalvy, 2017, see also Botás, 2021, Rutai, 2021, Tófalvy, 2022). In 2023, numerous newsrooms experienced Distributed Denial of Service (DDoS) attacks; in many cases the websites were down for several hours (IPI, 2023). Bátorfy & Bárdos (2023) found in their survey-based research that most Hungarian journalists in their sample consider harassment to be part of the job when they work as journalists. They also found that 43 percent of the sample don't use digital security tools.

The EU's General Data Protection Regulation (GDPR) has been regularly misused to stop journalists from publishing important research, as the sectoral rules on the protection and processing of personal data were amended belatedly, "without affecting the processing of data for journalistic purposes and for the purposes of scientific, artistic and literary expression" (Márton, 2023). Although the number of SLAPPs is relatively low, there are some high-profile cases, building on the GDPR. Some of the wealthiest Hungarians started court cases or administrative procedures for data protection at the National Authority for Data Protection (NAIH), arguing that journalists were misusing their personal data when writing about their business interests. Even if some of these cases are only administrative procedures that don't turn into a court case, they turn out to be costly and time consuming (see Hermann, 2024) for independent news rooms (many of which cannot afford having their own lawyers). As such, one can expect that these cases already have some effect of self-censorship. In a study, the Hungarian Civil Liberties Union (HCLU or TASZ) referred to the phenomenon as "private censorship". The organisation surveyed 34 news media outlets, out of which 13 reported having experienced SLAPPs; apart from GDPR cases, there were also SLAPPs based on defamation, despite its decriminalisation for journalists in 2023 (see chapter on Protection of freedom of expression). The HCLU turned to the European Court of Human Rights in relation to a number of GDPR-related cases (Döbrentey et al. 2024). In March 2024, the Budapest-Capital Regional Court decided that *Forbes* has the right to include the name and estimated wealth of the Barabás brothers (owners of the Hell energy drink company) in its list of wealthiest Hungarians (Bánáti, 2024) – in early 2020, the print edition of *Forbes* had to be recalled from news stands following a preliminary injunction by a Budapest court, as the owners of Hell objected to the publication of their identities on GDPR-grounds, and the outlet couldn't mention their names up until the 2024 decision.

Independence and effectiveness of the media authority (70% - high risk)

The Hungarian media's main regulatory body is the Media Council, a formally autonomous decision making body within the convergent regulatory body, the National Media and Info-communications Authority (NMHH). The fact that the independence of the Media Council is severely limited can be demonstrated by the rules governing the election of its members, the powers of the Board and, above all, its practice. Despite

concerns raised in both the MPM and the EU's Rule of Law reports, the European Commission accepted that Hungary appointed the NMHH to be the country's Digital Services Coordinator – a step that was criticised by numerous Members of the European Parliament (Tar, 2024).

The Media Council is composed exclusively of members nominated by the governing Fidesz party, including former municipal councillors, former political advisors and former Fidesz communications directors. The term of office of the members and the president is 9 years. The one-party Media Council has very broad powers, overseeing print and online media in addition to broadcast media. Its powers allow for very broad discretion in many cases. Its work is not transparent and the reasons for most of its decisions are not made public. The Media Council's political bias is most evident in its decisions affecting the media market. The whole process of bidding for radio frequencies clearly shows that the players close to Fidesz dominate the radio market by a huge margin and no one ever wins against them. In recent years, the authority has facilitated the expansion of *Karc FM* (now *Hír FM*) and *Gong Rádió*, both belonging to KESMA, as well as *Rádió 1* and *Best FM*, which belong to other Fidesz interest groups. There is also a clear political bias in the Media Council's decisions on mergers. In all cases, the authority has unconditionally and without delay approved mergers by Fidesz-linked operators and, with the exception of one decision in 2012, has always blocked mergers involving non-party media. The Media Council has never opposed government measures restricting press freedom. Further information on the lack of independence of the media authority and assessments of its effectiveness can be found in the MPM 2023.

Recently, the regulator looked at cases related to the alleged promotion of homosexuality in Hungary – a controversial issue as the anti-LGBTQ law (Act LXXIX of 2021 Amending Certain Acts for the Protection of Children which is seen as conflating homosexuality with pedophilia) enforced by the Media Council is considered to be violating EU law. There were cases in which the Media Council had found that television shows violated the anti-LGBTQ law of the country (the European Commission referred Hungary to the European Court of Justice over this law for “discriminat[ing] against people on the basis of their sexual orientation and gender identity.” European Commission, 2022). One example was a Netflix show in which “two girls profess their love and kiss each other.” *RFE/RL* quoted NMHH's statement according to which “under Hungarian law, the cartoon should have been made available with a rating of ‘not recommended for children under 12’.” The NMHH said its Media Council “is going to notify the Dutch audiovisual regulator (CVDM), asking it to investigate the case”. According to *RFE/RL*, the Dutch authority did not respond publicly (Heil, 2022).

The NMHH and Media Council websites are relatively informative. In addition to official documents and registers, market and other information is also available. An important element of transparency is the annual parliamentary report of the Media Council, which includes most of its decisions. However, most decisions published on the Media Council's website are only available to the public without the reasoning. The budget of the media authority has grown from 2022 to 2023, but so far there has been no increase to reflect its new role as Digital Services Coordinator. In general, we can still say that the authority has a relatively generous budget, but it is hard to assess how it is used. In 2024 the budget is HUF 57.8 billion (EUR 145 million) – in 2023, the budget was HUF 58.6 billion, and in 2022 47.8 billion.

Universal reach of traditional media and access to the internet (33% - low risk)

The must-carry rules ensure a secure and prominent place for public service television channels on all platforms, including DVB-T. The Hungarian net neutrality legislation is in line with the relevant EU legislation. The NMHH consistently takes action against business models that violate net neutrality.

According to the media regulator, the DVB-T2 Digital Video Broadcasting – Second Generation Terrestrial coverage is 99% (data from 2021). For radio stations, the NMHH lists older, 2014 data for coverage: *Kossuth Rádió* 96%, *Petőfi Rádió* 90%, national minority radio coverage 93% (NMHH, 2024). According to Digital Agenda data, 96.7% of households are covered by broadband. The average internet connection speed is 63 mbps, which is better than last year, but is now below the European average. 98.39 percent of households were covered by broadband in the year 2022. The top 3 internet service providers, Magyar Telekom, Vodafone and Digi had at least 82 percent of the market (NMHH, 2023a) of broadband in the general population (the 4th player, Invitel was taken over by Digi, and even some of the smaller players are owned by the big 3). In 2023, Digi's owner, the government-aligned 4iG, acquired Vodafone, meaning that, in fact, two companies have a dominant market position: 4iG (owner of Digi and Vodafone) and Magyar Telekom. 4iG has in the past years also bought Invitel, which used to be the 4th biggest player on the broadband market. When it comes to the mobile internet market, the top 3 control 98 percent: Magyar Telekom (46%), Yettel (26%) and Vodafone (26%) (NMHH, 2024b). Until the end of 2023, both Yettel and Vodafone were (partly) state-owned, but the Hungarian state sold its stake in Yettel in December 2023 (Hungary Today, 2023).

Focus on the digital environment

The legal framework for online communications does not differ significantly from the general legal framework for public communications and is to a large extent aligned with the European legal framework. The National Media and Infocommunications Authority (NMHH), which is considered politically controlled, will also act as the Digital Services Coordinator for Hungary under the Digital Services Act, as of 2024.

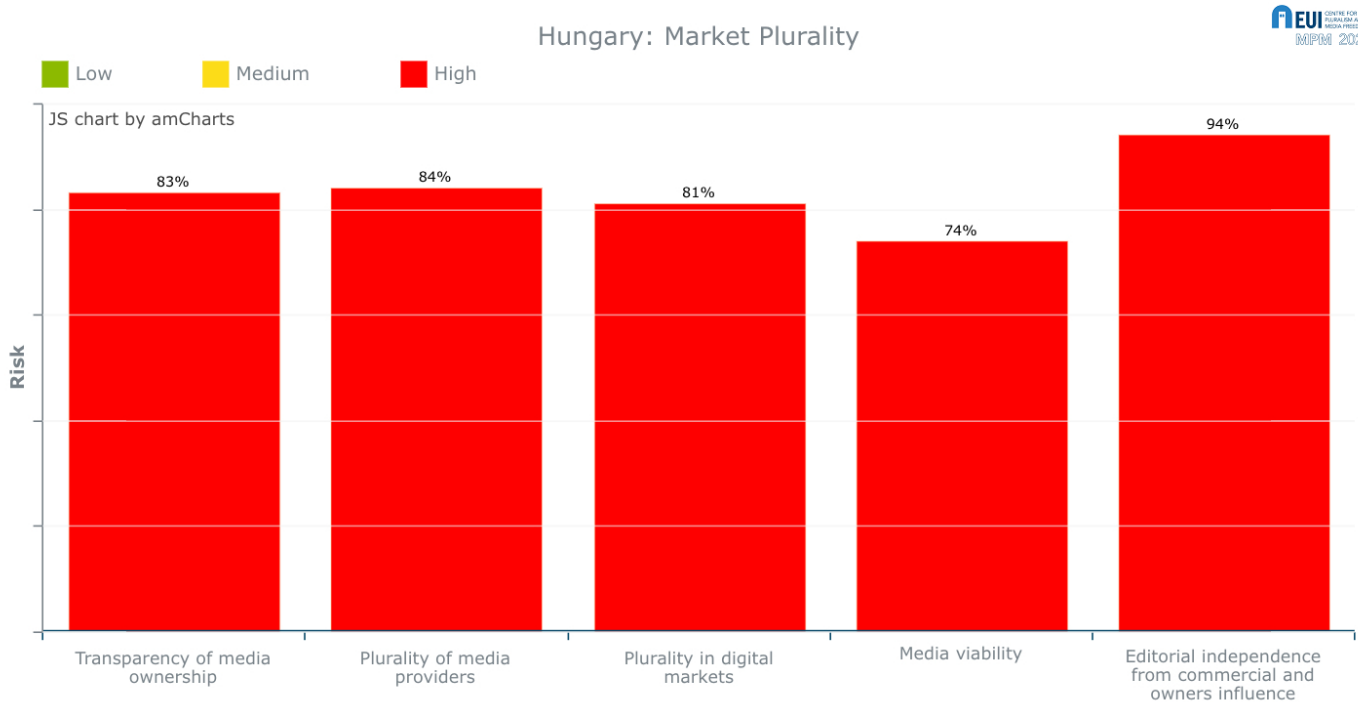
Arbitrary filtering, blocking or removal of online content by authorities is not known. The moderation practices of social media sites are heavily debated, as the blocking of certain content and the deplatforming of certain actors was considered opaque (OJIM, 2023a&b). In 2022, the Hungarian media regulator ordered the blocking of Russian-origin news media, in accordance with EU sanctions. However, civil society pointed towards the PSM's heavy reliance on content originating from banned media, such as RT (Kapronczay, 2022). The transparency reports of online platforms (VLOPS), for example under the Code of Practice on Disinformation, provide some information on content removed. These numbers are more or less in line with the numbers shown for other countries. Google's July 2023 report (disinfocode.eu, 2023), for example, shows that in the first 6 months of 2023, 26 appeals were made in Hungary in regards to content removed for violating YouTube's misinformation policies, and 3 of them were reinstated. Another proxy for the quality of content moderation (and a safeguard against arbitrary removals) is the number of local moderators employed. The performance of platforms is unequal here. LinkedIn's DSA transparency report doesn't mention content moderators with Hungarian language skills (LinkedIn, 2023), TikTok mentions 63 content moderators for Hungary, Facebook has 24 (Facebook, 2023) and Youtube 25 (Google, 2023).

The market for internet service providers is heavily concentrated, as it is dominated by two companies: 4iG (owner of Digi and Vodafone) and Magyar Telekom.

In 2023, numerous newsrooms experienced Distributed Denial of Service (DDoS) attacks; in many cases the websites were down for several hours (IPI, 2023). As in previous years, it can be highlighted that the online bullying and harassment of journalists is common, especially in the case of female journalists (Tófalvy, 2017, see also Botás, 2021, Rutai, 2021, Tófalvy, 2022). Bátorfy & Bárdos (2023) found that many journalists don't use digital security tools.

3.2. Market Plurality (83% - high risk)

The *Market Plurality* area considers the economic dimension of media pluralism, assessing the risks deriving from insufficient transparency in media ownership, the concentration of the market in terms of both production and distribution, the sustainability of media content production, and the influence of commercial interests and ownership on editorial content. The actors included in the assessment are media content providers, with indicators including *Transparency of media ownership*, *Plurality of media providers*, *Media viability*, *Editorial independence from commercial and ownership influence*, and *digital intermediaries* (with the indicator on *Plurality in digital markets*).



In the **Market Plurality** area, all indicators score high risk. This is also the area with the highest overall risk, at 83%. The scores show that the country encounters serious problems that are related to the concentration of media, decreasing revenues, commercial and owner influence over content and lack of sufficient transparency.

Transparency of media ownership (83% - high risk)

There are no detailed rules on transparency in the ownership structure of media companies. Transparency is partly ensured by publicly accessible registers kept by the media regulator, however, these registers only provide limited information on media service providers, neither the direct nor the indirect ownership background behind the media service provider is part of it. Direct ownership information is available from the company register. Overall, the rules on the disclosure of company information are in line with EU standards.

The media service provider of a linear media service must notify the authority within fifteen days if there is a change in the data in its register. The authority may impose a fine on the media service provider for late compliance or failure to comply with the change of information. In the case of a media service right which has been awarded by tender, the media service provider must notify the Media Council within five days of the ownership change. Failure to do so is not subject to any specific sanction, which means that the general consequences of breaching the law and the contract apply.

Transparency of media ownership is significantly limited by the fact that the owners who can be identified from company data are not necessarily the final decision-makers. They are often only intermediaries, who have gained access to the media not through their own efforts, but through substantial political and state support. There are no requirements to disclose the ultimate owners.

Overall, the transparency of media ownership background is in practice somewhat better than what follows from the legal environment – the public is often aware of the ultimate beneficial owners behind a particular outlet. This is because journalists and researchers are actively exploring ownership changes and the political connections behind them. Concerning financial reporting, there are no media-specific obligations, however, reporting of the general annual financial statements is obligatory, just like in other sectors.

Plurality of media providers (84% - high risk)

The Hungarian media concentration regulation is of the so-called audience-share type, allowing media businesses (in the audiovisual and audio sectors) to acquire new licences and market segments as long as their annual average audience share remains below the specified threshold of 35%. The chance of any media group in Hungary to even approach this share is virtually zero. This was already known when the law was adopted.

According to the media law (Act CLXXXV of 2010), media service providers reaching the 35% threshold will not be able to obtain further licences. An undertaking which is also present on the television and radio markets and has an average annual audience share of at least 40% in both markets is also subject to restrictive regulation.

The rules do not apply to public service, community and thematic media services. This exception was included in the law because without it KESMA would not have been able to simultaneously own all its radio stations: the national commercial radio station *Retró Rádió*, the political talk radio network *Hír FM* (former *Karc FM*) and the music network *Gong FM* together would exceed the market share of 35%, but since *Retró Rádió* was classified as a thematic music radio station, the threshold doesn't apply.

A further element of media concentration regulation, not only affecting horizontal concentration, is the control of media mergers by the media authorities.

According to the Media Act, the Hungarian Competition Authority is obliged to obtain the opinion of the Media Council when examining mergers between undertakings or groups of undertakings in which at least two members of the group have editorial responsibility and whose primary purpose is to provide media content to the public via an electronic communications network or a printed press outlet. The Media Council's opinion is binding on the Competition Authority. For now, the Media Council has issued reasoned opinions in only three out of seven cases, of which only one has been cleared by the regulator (the merger between M-RTL and the IKO group). The technical content of the decisions is inconsistent and lacks reasoning (see Mérték, 2021b).

Based on the revenue and audience data available, the media market is very concentrated in Hungary, especially in the print, television, and radio markets (NMHH, 2023b; NMHH, 2024c). The biggest commercial audiovisual companies based on 2022 revenues are TV2 Zrt (pro-government): HUF 47.8 billion (ca EUR 125.8 million), Magyar RTL Zrt (independent): HUF 47.2 billion (ca EUR 124.2 million), Viacom Int. Hungary (only entertainment content): HUF 6.0 billion - ca EUR 15.8 million, and HirTV Zrt (pro-

government): HUF 4.9 billion (ca EUR 12.9 million). The PSM has 134.6 billion (ca EUR 354.2 million) in revenues. There were 435 television channels in 2022, incl. local channels. TV2, RTL, the PSM and Viacom combined have more than a 60% share on the audiovisual market. The audience share of the top4 television companies is 56.0%, based on 2022 data. The top 4 companies are: - S.C. CEE Broadcasting/TV2 Group: 24.3%, CLT-UFA/Magyar RTL: 16.7%, Duna (PSM): 10.9% and Network4: 4.1%. While market share of radios cannot be calculated, the audience share of top4 radios (Retro Radio, Radio1, Kossuth Radio and Petofi Radio, all government-aligned) is 86% of the top10's share (NMHH, 2024a). The market of newspapers is heavily concentrated, due to the small number of national print dailies (with a top4 share of 100 percent). The online news media market is more diverse, but exact shares cannot be calculated. The market is dominated by *Index* (government-controlled), *Blikk* (tabloid), *Origo* (government-controlled) and *24.hu* (independent) (NMHH, 2024d), but there are lots of additional independent news outlets.

If we look at the whole media market (cross-media), based on the financial results of 34 companies (and the public service media), the market share of the top4 service providers can be estimated at 80 percent: the public service media had HUF 134.6 billion revenue (ca EUR 354.2 million), Mediaworks. HUF 79.9 billion (ca EUR 210.3 million), TV2 HUF 49.0 billion (ca EUR 128.9 million), and RTL HUF 48,4 billion (ca EUR 127.4 million).

Plurality in digital markets (81% - high risk)

Due to the extremely high share of large digital platforms (Alphabet, Meta), the online advertising market has become very concentrated (NMHH, 2024d). These platforms outperform traditional media: Google has 3 million, Facebook 1.45 million daily unique users, while Index and Blikk are somewhat below 700 thousand. There are no specific concentration regulations focusing on online platforms. The top 4 online players share 69.2% of digital advertising revenues: Alphabet (HUF 72.8 billion - ca EUR 191.6 million), Meta: (HUF 30.9 billion - ca EUR 81.3 million), New Wave Media Group (HUF 4.8 billion - ca EUR 12.6 million), Indamedia Network (HUF 4.0 billion - ca EUR 10.5 million) (NMHH, 2023b, MRSZ, 2023). There are no initiatives addressing concentration of online platforms.

There is no special tax for platform providers. Even though Hungary transposed the Council Directive 2022/2523 of 14 December 2022 on ensuring a global minimum level of taxation, it has applied a lower tax rate and the undertaxed profits rule will apply by 2025.

There are financial agreements in Hungary between Alphabet/Google and a small number of media providers, to remunerate the media providers for the use of copyright-protected content (and some support measures for media), but these are considered problematic (see digital focus). In 2023, Google News Initiative' Startups Lab published a call for news startups in the region to participate in a coaching program (Tarr, 2023b). The Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market has been transposed under Act XXXVII of 2021, Repropress, the Association for the Reprographic Rights of Publishers announced in 2023 that it will act as a copyright collecting agency for its members, but the process of getting there is burdensome (for further details, see the digital section).

Media viability (74% - high risk)

The indicator scores high risk due to adverse economic revenue trends, which are not sufficiently counterbalanced by innovative business models; the precarity of employment; as well as insufficiency of public support. The MRSZ (Hungarian Advertising Association) provides figures of the latest advertising trends. According to these, revenues seem to have increased in nominal terms by 11% compared to 2022. Due to the high inflation rate, this means in fact a decrease in real terms (-6.6%); spending declined below the 2019 level in real terms (-4.7%). In 2023, the earlier pace of growth in the digital segment slowed down, but the media landscape was still dominated by digital players: more than half of advertising revenues (52%) went to digital media. Within this segment, the global digital platforms gain approximately 2/3 of the advertising revenues (MRSZ, 2024). All media segments saw a decrease in revenues, in real terms.

The viability of the local media market is highly uncertain. There are a lot of local newspapers, but they are published by municipalities and financed by public sources. It is also the case with local televisions in bigger settlements. There are only a few (ca 10) local independent newsrooms in the country; they all provide online services. They are very small – typically one or two journalists per newsroom. Sometimes they run crowdfunding campaigns, and at times apply for grants from international donors.

Independent news organisations are innovative, and they introduced several new business models (e.g. crowdfunding, paywalls, freemium models, but also book publishing, the sale of branded merchandise or the organisation of conferences) over the years. They also introduced innovative formats (video, podcast, data journalism, long-form journalism, e-book and bookazine, fact-checking service), but these services are rather costly for the newsrooms, due to the high human resource needs. One of the most popular online media is *Partizán*, a YouTube channel with daily shows; it is extremely popular and can be supported on Patreon. In some cases, there are dedicated grants behind these projects, and thus their long-term sustainability is uncertain – not to mention that recipients of foreign grants are often targets of smear campaigns (Bleyer-Simon, 2022). Only a small segment of Hungarian society can afford to support independent media. The high inflation and the growing economic problems may jeopardise the future of these revenue streams. The economic difficulties make these models rather vulnerable.

There is no transparent public support scheme for the news media sector. There is a scheme (Médiatanács Támogatási Program) that can be used, among other things, for news production, but it is only available for local television and radio stations, thus very few independent media qualify and procedures of allocation are not known. The budget for 2023 was HUF 1,44 billion (ca EUR 3.8 million) (see Act LXXV. of 2023). There is no assessment of the impact, transparency or fairness of this support scheme. Pro-government media is heavily financed by state advertising (Mérték, 2023a).

There are no statistics about the numbers of employed journalists, only proxies that can imply that currently the number of journalists is relatively stable (meaning a slow decrease overall). In its latest report, MÚOSZ, the National Association of Journalists reported a “40-50 person” decrease in members, which means that the number of members is “slightly above 2500” - but membership in MÚOSZ doesn't necessarily mean that the persons are employed (MÚOSZ, 2023). Journalists were let go at the pro-government *Hír Tv* and *Karc FM* (now *Hír FM*) (See: Szalay, 2023b & Média1, 2023). Managers of independent media outlets we spoke to reported that, in their case, the newsroom staff was relatively stable in the past years or even slightly growing - but as Budapest-based middle-sized media, they are not representative of the market as a whole (pro-government outlets didn't respond to our inquiry).

Editorial independence from commercial and owners influence - (94% - high risk)

The situation of journalists and newsrooms is vulnerable in Hungary. There is no mechanism granting social protection to journalists in case of changes of ownership or editorial line. Industry associations are weak, and self-regulation is not respected.

Article 7 of the so-called Press Freedom Act (Act CIV of 2010) protects the independence of journalists in the following way: "Journalists are entitled to professional independence from the owner of the media content provider and from the person supporting the media content provider or placing a commercial announcement in the media content, as well as to protection against pressure from the owner or the person supporting the media content to influence the media content (editorial and journalistic freedom). A journalist cannot be penalised under employment law or any other legal penalty for refusing to comply with an order that would curtail his editorial and journalistic freedom." In practice, however, this rule has no practical significance, and no journalist has ever taken legal action on this ground. There is no regulatory safeguard to ensure that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests (albeit in some cases, such as that of *Telex*, journalists can vote for their preferred candidate) and there are no effective conscience clauses. Some newsrooms that have more than 50 employees set up internal whistleblowing systems, but reports are handled internally, and anonymity is not guaranteed.

There are no laws and/or self-regulatory measures stipulating that the exercise of the journalistic profession is incompatible with activities in the field of advertising. The Code of Ethics of the National Association of Hungarian Journalists (MÚOSZ) mentions that journalists cannot be mandated to work on advertising-related tasks. But they are free to do so out of their own choice (MÚOSZ, nd).

The Act CIV of 2010 on the Freedom of the Press (Art. 20) requires that advertisement should be distinguishable from editorial content. This is also emphasised in the codes of ethics of industrial organisations (Hungarian Association of Content Providers, Hungarian Association of Publishers and National Association of Hungarian Journalists). At the same time, disguised advertising remains a problem, and the Media Council still has to impose fines on (Kéfer, 2023 & Pénzcentrum, 2023).

Commercial influence often overlaps with political influence, as the share of government advertising in total advertising revenues is in certain segments higher than 30% (Mérték, 2021a), moreover, the government is able to create dependencies or exert pressure on many actors in the economy as a whole, through tax breaks, strategic agreements, strict regulatory controls, or even through unfavourable changes to the legal environment in which business operates. For this reason, many commercial advertisers turn away from independent media (Mérték, 2023a, Bleyer-Simon, 2022, Martin, 2022 & Odehnal, 2023). On a lower level, Mertek found signs of commercial interference in local media. For example, the local newspaper of Debrecen often published advertising by the company whose new developments/investments were covered in the very same issue of the outlet (Mérték, 2023b).

Some major media have relevant interests, links or activities in non-media businesses. The most popular radio station (Rádió 1, but also another popular station Best FM) is owned by Zoltán Schmidt, who is director of the construction firm Fejér-B.Á.L. Zrt. The construction company is owned by the family of Lőrinc Mészáros, the country's richest person (childhood friend and supposed middleman of Viktor Orbán). Fejér-B.Á.L. Zrt. is the winner of several public tenders (Botos, 2020). The news and public affairs television ATV is owned by the founder and leader of the equally accredited Pentecostal Faith Church (Bodoky, 2020). The

Church receives state support (like every other recognised church), but ATV also received state subsidies during the COVID-19 pandemic (30% EU funds) (Erdélyi, 2021). The main shareholder of the leading commercial audiovisual TV2 is József Vida through his company “Abraham Goldmann Bizalmi Vagyonkezelő Zrt.”; Vida has good business relations with the above mentioned Lőrinc Mészáros. In addition, the other owner of TV2 IKO is also considered a Mészáros interest (Csabai, 2023). The companies of Mészáros are heavily reliant on public procurements.

Possible conflicts of interest may also emerge with some smaller print and online media. The sex-cam entrepreneur György Gattyán (owner of the Live Jasmine pornographic website, who was in the past years often listed as one of the 10 richest people in Hungary) is founder of the party Megoldás Mozgalom (Solutions Movement) and also bought a news media outlet this year, called frishirek.hu (Szalay, 2023c). Gattyán is also one of the inventors of a new sport called teqball (a football-like sport that is being played on a table, very similar to a pingpong table), the companies that aim at popularising the sport received significant state subsidies in the past years (Bucsky, 2022). We can also mention that two independent news media (Magyar Narancs and Magyar Jeti Zrt., the publisher of 444.hu) are partly owned by the Media Development Investment Fund (MDIF), which is in the public discussion associated with the investor George Soros. At the same time, it has to be mentioned that Soros is now retired, and the organisations founded by him have no control over the MDIF, they are simply two of the many donors behind this organisation.

For the largest media, there are no practices of disclosure of any actual or potential conflict of interests of media owners. 444 published an article in 2014 (Uj, 2014) in which it informed its audience that the outlet got a new minority stakeholder (MDIF/Digital News Ventures), and most independent outlets publish the names of all institutional donors on their websites (in some cases they also add disclaimers under individual articles).

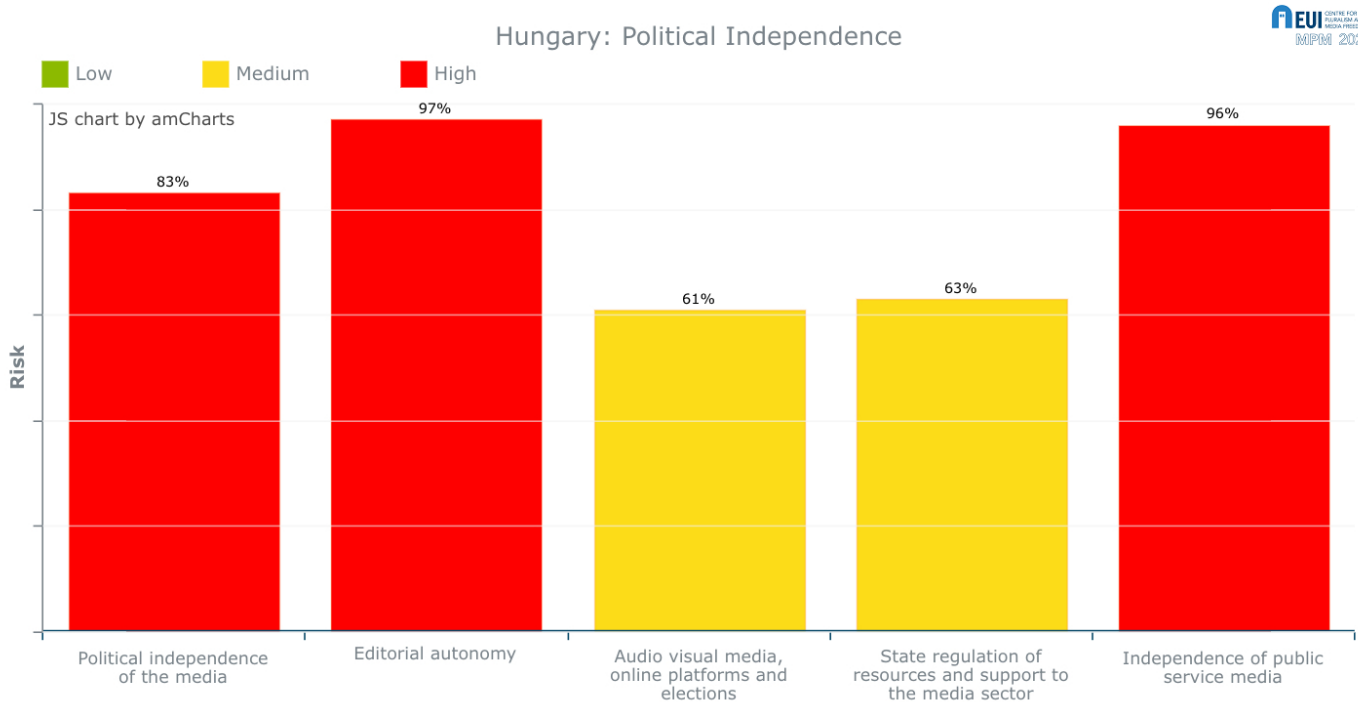
Focus on the digital environment

The largest players on the online media market are pro-government outlets and large tech companies. Due to the extremely high share of large digital platforms (Alphabet, Meta), the online advertising market has become very concentrated (NMHH, 2023d), these two platforms are the main recipients of advertising revenues and the number of their daily unique users is 2-4-times higher than that of the most popular online news media. There is no tax on online platforms so far. When it comes to news media, the online media market is still somewhat more diverse than the other sectors. Due to the low barriers to entry, one can find independent media both on the national and local level, as well as a number of specialised outlets (be it economic or investigative). Many of these media successfully experiment with new formats and new revenues.

There are financial agreements in Hungary between Alphabet/Google and a small number of media providers, to remunerate the media providers for the use of copyright-protected content (and some support measures for media), but these are considered problematic. In 2023, Google News Initiative' Startups Lab published a call for news startups in the region to participate in a coaching program (Tarr, 2023b). The Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market has been transposed under Act XXXVII of 2021, Reopress, the Association for the Reprographic Rights of Publishers announced in 2023 that it will act as a copyright collecting agency for its members. The process of setting up a framework of compensations for news media was hampered by a change in Act XCIII of 2016 on the joint management of copyright and copyright-related rights (which obliged joint management organisations to prepare a detailed impact assessment and a detailed justification for its list prices), as well as information asymmetry, as only platforms know what share of their revenue comes from a given country, but they don't share that information. Some Hungarian outlets, like *Media1* and *Index* had bilateral agreements with Google since early 2022 (Gulyás, 2023). According to Google, the company's bilateral agreements represent 54% of the Hungarian market. At the same time, the amounts paid to media publishers are considered low (for example, Lukács, 2024 wrote that his outlet *Magyar Hang* declined an offer from Google's Extended News Previews: EUR 126 for the whole year). Moreover, according to news reports, outlets saw themselves pressured by the tech giant, as it required them to make decisions about staying in the bilateral remuneration program before they could find out about the conditions under which Reopress could represent them. Furthermore, Google declared that it would stop displaying snippets by media represented by Reopress, as long as they didn't agree on the conditions (Szalay, 2024a). Reopress submitted its proposed methodology and proposed fees to the Ministry of Justice in February. In March 2024, the Ministry of Interior rejected the fees proposed (Szalay, 2024b). Meta changed its terms of service after Hungary transposed the copyright directive (Facebook, nd).

3.3. Political Independence (80% - high risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



The **Political independence** area scores a high risk at 80%. The score is mainly driven by the indicators on Political independence of the media, Editorial autonomy and Independence of public service media, which all score high risk. These indicators show that the governing party has a very strong influence over content production and editorial decision making in the PSM, as well as in many private media. No major changes have been recorded since last year.

Political independence of the media (83%)

Articles 43 and 46 of the Media Act (Act CLXXXV of 2010 on Media Services and on the Mass Media) mention a list of offices that are not compatible with media ownership and activities in publishing, moreover, Article 36(1) of Act CLXXXIX of 2011 on Local Governments describes conflicts of interests for local deputies and mayors, listing, among others, management positions in media service providers. The conflict of interest rules listed in the law do not exclude Members of Parliament from being media owners. In fact, there has been an example of an MP being a direct media owner (in the case of some local online outlets and the now defunct Azonnali.hu, which were owned by the opposition MP Péter Ungár). Overall, however, these conflict of interest rules are of no real relevance today, as formal conflict of interest rules have never prevented media ownership by actors with close political connections or who regularly win public contracts in other industries. A new politically-affiliated media owner is the sex-cam entrepreneur György Gattyán; he is founder of the party Megoldás Mozgalom (Solutions Movement) and also bought a news media outlet in 2023, called frissshirek.hu (Szalay, 2023c). There is a revolving door between journalism and political work; this year, for example, it was reported that the former editor-in-chief of Zoom.hu, Norbert Kustánczi, started

working for an opposition politician, Member of the European Parliament Anna Donáth as a local assistant (Szalay, 2023d). There are also reports that show that the Hungarian government pays journalists in other countries through fellowships that might influence their reporting on the country (Fekő, 2023a).

Indirect influence via proxies, government-aligned investors and business ties is one of the main characteristics of the Hungarian media market (Dragomir, 2017; Szeidl & Szucs, 2021; MFRR, 2021). KESMA (Central European Press and Media Foundation or CEPMF) is the most prominent example of government control: the foundation (founded by the Media Fundamentum Nonprofit Zrt, that is owned by József Tamás Kertész, lawyer of the previously mentioned Lőrinc Mészáros) owns more than 400 news media outlets (see among others Brogi E. et al., 2019).

In relation to the lack of independence at KESMA-owned media, the Country Memorandum of the Commissioner of Human Rights (CoE) in 2021 highlighted among other things that the KESMA outlets (as well as the PSM) are characterised by a “dominant and largely unanimous pro-government narrative” (CoE, 2021) with very little accountability. In addition, one of the two big commercial television stations (*TV2*) and a news tv channel (*Hír TV*) are controlled by entities with very close connections to the governing party (Bede, 2018; Rényi, 2018; Kreatív, 2021), as well as the largest radio stations (*Retró FM*, *Rádío 1*-network, *Hír FM*, *Gong FM*, *Trend FM*, and *Best FM*). Moreover, the PSM is completely under the control of governing parties and is considered a government mouthpiece that amplifies the government’s narratives. Access to the national news agency *MTI* is free for all media outlets, but it is also considered being under the control of the government, which impacts the objectivity of its coverage (Wirth, 2022a&b). At the same time, it needs to be highlighted that despite severe distortions and the dominance of pro-government voices in certain sectors, audiences still have access to a wide range of views - especially in print and online (see Polyák et al. 2022, Tóth et al. 2023).

Pro-government actors often describe independent media as biased and as serving foreign interests, however, there is no proof for these claims. Many independent media receive grants from foreign foundations, but, according to media workers, these do not have an influence on their reporting (see Bleyer-Simon, 2022). Pro-government actors often orchestrate smear campaigns against independent media. In 2023, for example, *Átlátszó* and its editor-in-chief, Tamás Bodoky were accused in pro-government media of “betraying” the country, as well as of “attacking Hungarian minorities in neighbouring countries, working for foreign interests and being a national security risk, due to their collaboration in a cross-border investigative project” (IPI, 2023).

Editorial autonomy (97%)

Many newsrooms are directly controlled by the governing party’s proxies, and thus publish content that is heavily biased towards the government. The public service media is widely considered as being under direct governmental control. The state-owned Hungarian News Agency (*MTI*) is a subsidiary of the Hungarian PSM. In the past years, investigative articles were published that prove that the PSM management requires employees to further the interests of the Fidesz government in their articles (Keller-Alánt, 2020), while the journalists and editors of the news agency take direct orders from politicians (Wirth, 2022a&b). According to testimonies of former PSM employees, content published on the PSM was often directly requested or even written by employees of the Cabinet Office of the Prime Minister (444.hu, 2022).

There are no regulatory safeguards (neither laws nor statutes) that prevent political influence over the appointments and dismissals of editors-in-chief. There are also no effective self-regulatory codes that would be followed by the majority of newsrooms. MÚOSZ (National Association of Hungarian Journalists) has an ethical code, but it is ineffective. There is no research on self-regulation per se, but ethical breaches are common in pro-government media (both the PSM and private outlets) that often publish fabricated, defamatory articles about the government's opponents (see the documentary by Kiss et al., 2023).

Audio visual media, online platforms and elections (61%)

There has been no election in 2023. National elections took place in 2022, while 2024 is the year of the European Parliament and municipal elections. According to the Media Act of 2010 (Art. 96), the Press Freedom Act (Art. 13) and the Code of Ethics of the Public Service Media (p. 16), the PSM channels and services are expected to provide fair, balanced and impartial representation of political viewpoints in news and informative programmes. In practice, the PSM cannot live up to this requirement. The PSM doesn't have to air political shows (and thus invite dissenting voices) and doesn't have to provide airtime to opposition politicians. Prior to the national election in 2022, the MTVA usually announces that it is "going beyond its legal obligation" by providing 5 minutes of airtime to each party's candidate (Presinszky, 2022). Assessments show that this practice leads to an overrepresentation of the governing party's candidates (see also OSCE, 2022). After the independent Member of Parliament Ákos Hadházy filed a complaint with the PSM about the lack of balanced coverage, he received a response in which the operator of the PSM, the Duna Media Service Nonprofit (Duna, the publisher of the PSM), argued that the new media environment doesn't mandate the PSM anymore to provide balanced coverage, in the sense that diverging points of views should be represented, as audiences have the chance to access those views through other media (Hadházy, 2023). A similar argument was made by András Koltay, the President of the NMHH and the Media Council; he said in an interview in early 2022 that the independence of the press was only a myth created by journalists, and argued that the concept didn't make sense from a legal point of view (Lampé, 2022).

Public service media providers are obliged to publish political advertising by all candidates' organisations free of charge during the election campaign period. Private media can decide whether they want to provide airtime to political advertising or not. Audiovisual media and radio have to provide advertising space for free, if they opt to host political ads, while print and online can ask for remuneration. The price of individual ads can be found on the website of the State Audit Office (Asz.hu), and outlets have to publish a detailed list of ads run during the campaign period. The election campaign regulations do not explicitly address social media. However, the National Audit Office, which monitors campaign spending, published a manual on accounting for campaign expenditure (ÁSZ, 2020). According to the National Audit Office, its provisions on campaign funds and campaign activities should also apply to political advertising content on social media during the campaign period – but the rules and the practice have shortcomings (see digital section). Issue-based advertising (also referred to as social advertising, or, in the case of governmental messages, public service announcement) is not properly regulated, thus enabling the government or other interest groups to run ads (both online and offline) on political topics that might influence voter behaviour, while not being subject to campaign rules (Mertek, 2021b). Often advertising campaigns run by the government, public consultations or civil society organisations' awareness raising campaigns are seen as indirectly campaigning for (or against) certain political actors running for office (and at times overlap with state advertising, when it comes to using state funds to subsidise friendly outlets). While most of such indirect campaign spending benefits the current government, according to a presentation by the National Information Centre (headed by the Minister of the Prime Minister's Cabinet Office, Antal Rogán),

organisations supportive of the opposition (including an association founded by a politician later becoming the oppositions candidate for Prime Minister) received the equivalent of HUF 4 billion (ca. EUR 20 million) from foreign foundations to spend on campaigning purposes (Cseke et al. 2023). The controversy around the case of indirect campaign support was described as a major problem in the pro-government (but also to an extent in the independent) media, and was used as pretence by the governing party for the proposal and passing of the so-called Sovereignty Protection Act, which is widely seen as a tool to put pressure on independent media.

The National Authority for Data Protection and Freedom of Information is tasked with monitoring the use of personal data on individuals by political parties for electoral campaigning purposes, but its independence is often called into question. It rarely acts on the misuse of data for political purposes, especially if the governing party is concerned. One such case was the government's misuse of email addresses collected for registration for COVID vaccination for political campaigning (HRW, 2022).

State regulation of resources and support to the media sector (63%)

The rules on spectrum management are essentially set by European norms (See Act C of 2003 on Electronic Communications Article 11 (1); Hungary has also transposed the EU Electronic Communications Code). At the same time, there is a clear bias in the allocation of radio frequencies (Mérték, 2023a).

The Media Act doesn't mention direct subsidies. There is a support programme for local TVs and radios, which can be used for news production. The budget for 2023 was HUF 1,44 billion (ca EUR 3.8 million). There is no assessment of the impact and fairness of this support. In the past, there have been examples of unfair and opaque ways of supporting private news outlets through grants and favourable loans, but for the last few years, there have been no reports of similar developments (see previous MPM reports). The only indirect subsidy is the reduced VAT which is available to all print news media outlets. In 2024, a new VAT-law will be introduced for dailies. This will disproportionately benefit pro-government media, as most daily publications, such as Magyar Nemzet, Bors and the local dailies are owned by KESMA / Mediaworks.

Non-transparent governmental support mainly takes place in the form of state advertising (including advertising from state-owned companies) – which is currently unregulated. The mechanisms and degree of the misuse of state advertising has been described in detail in previous MPM reports – state advertising is used both to covertly support friendly media and to spread messages that can benefit the governing party. For years now, the government is seen as the largest advertiser on the Hungarian media market. In 2023, it was uncovered that MVM (state-owned energy firm) spent most of its advertising budget on government-friendly news media (MAPMF, 2023b). State advertising also manifests on social media – not to support friendly outlets, but to amplify favourable narratives. In an analysis, the news portal Telex (using the Meta ad library) found that the Hungarian government and the Hungarian governing party (together spending close to EUR 2 million euros since 2019) are the largest political advertisers on META, followed by political influencers (many of which are also government-aligned) (Hanula, 2023).

Independence of public service media (96%)

The independence of public service media is one of the indicators with the highest risk score in the MPM2023, as the Hungarian PSM is financially dependent on the governing majority in Parliament, is controlled by political interests, and is seen as extremely biased in its reporting (e.g. OSCE, 2022). The presentation of Russia's aggression against Ukraine in the public media is largely a rehashing of the

Russian narrative (Urbán et al. 2023). In early 2024, the PSM's website started promoting content by private pro-government media outlets (and vice versa) which shows a clear alignment between them (Herczeg, 2024).

The media law states that the Media Service Support and Asset Management Fund (MTVA) exercises the ownership rights and responsibilities of public service media assets, and – among other things – it is also in charge of producing or supporting the production of public service broadcasting items. At the head of the Fund is a CEO who can be appointed and recalled by the president of the Media Council without providing reasons for the dismissal, and whose work is not subject to review by any public body. According to the law, the Duna Media Service Nonprofit Ltd. (Duna) is the provider of all public service television, radio and online content services, as well as public service news agent's activities from July 2015.

According to the media law, Duna is the public service media provider and it is more or less appropriately subject to external control mechanisms, but in reality, the oversight is merely a façade since it has no resources for the actual performance of these functions. At the same time, the MTVA is subject to the review of a single organisation: the Media Council. As described earlier in this report, the Media Council members were delegated by the ruling party.

The MTVA disposes of taxpayer funds without being subject to any meaningful outside control and thus, there is little information on how its resources are allocated. The Parliament's governing majority makes the decisions about the level of public support for the MTVA. The PSM is considered overfunded. For 2023, the proposed budget was HUF 130 billion (Cseke, 2022), HUF 3.5 billion lower than in the previous year (despite the high inflation). In 2024 (a year of municipal and EU elections), the budget is expected to increase to HUF 142.5 billion (ca EUR 360 million) (Fekő, 2023b).

There is only a limited guarantee that the online public service missions of the PSM are fulfilled without distorting competition with private media actors. The so-called public service value test (Article 100/B of the Media Act), which requires the public service media provider to assess and verify the public service nature and value of its services (both broadcast and online) and their impact on the diversity of the media market. The detailed rules are adopted jointly by all the organisations or bodies involved in the procedure, at the initiative and under the coordination of the public service media service provider. Under the rules adopted, the Public Service Values Test is coordinated by the Public Service Values Board, whose members are delegated by the Public Service Board, the Board of Trustees of the Public Service Foundation and the Media Council, each from among its own members, and the rules for the delegation of members are laid down in the internal rules of each organisation. Of the procedures the Board has so far carried out, only one has dealt with an online service (m3.hu, the online edition of the PSM's 3rd channel, which is focusing on republishing archival material) and one with the PSM podcast channel.

Focus on the digital environment

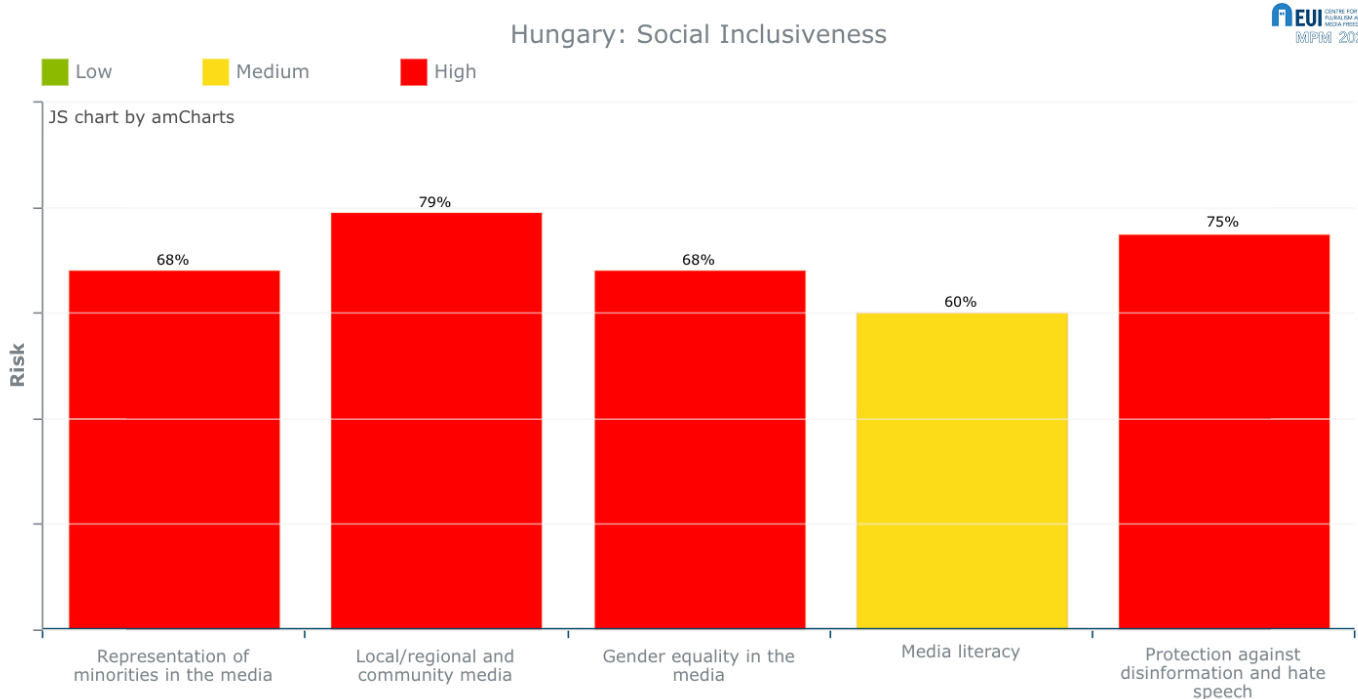
While the dominance of the governing party is most visible in broadcast and print, a degree of political control is also visible online, but not to the same extent as in other sectors. According to the NMHH's assessment, readers spend the most time on the government-controlled *Origo* and *Index* (followed by the tabloid *Blikk*, and the independent *24.hu* and *Telex*). *Origo* openly spreads pro-government propaganda, while *Index* has also been supportive of the government since the change of ownership in 2020. At the same time, *Hvg.hu* and *24.hu* are two large independent news portals backed by relatively stable publishers and a broad product portfolio. A number of small independent news startups have been created by journalists who left their increasingly government-oriented media outlets. *Átlátszó.hu*, *444.hu* and *Telex* were launched by former *Index* journalists, while former journalists from *Origo.hu* created the investigative portal *Direkt36*. There are also examples of local journalists, formerly employed by regional publications, launching small news startups focusing on their respective localities. These smaller investigative projects and news portals are largely funded by donations, subscriptions or grants, with very limited access to the advertising market.

The election campaign regulations are fair and include online news media, but they do not explicitly address social media. However, the National Audit Office, which monitors campaign spending, published a manual on accounting for campaign expenditure (ÁSZ, 2020). According to the National Audit Office, its provisions on campaign funds and campaign activities should also apply to political advertising content on social media during the campaign period – this also implies that the maximum amount that can be spent on campaigning also covers the amount spent on social media. However, “it is not clear from the budget which activities on social media platforms constitute campaigning activities and which do not, and it is not clear which activities should be taken into account for the purposes of the HUF 5 million [approx. EUR 14,000] limit and which should not” (ÁSZ, 2020). In other words, the Audit Office ultimately provides no clear guidance as to whether the promotion of content on social media that is not explicitly political advertising constitutes campaign activity. While platforms have their own rules on political advertising, they are not always enforced properly. *Lakmusz* found that, despite TikTok's ban on political advertising on its platform, many political parties ran paid political campaigns on TikTok (Német, 2023). Aside from politicians and parties, pro-government media and influencers are among the major advertising spenders on social media. The Megafon Centre, a group of government-friendly influencers, is one of the most active spenders on social media, it is widely believed that the organisation (which also provides trainings for wannabe influencers) is covertly financed from taxpayer money (see Fekő, 2024)

There is only a limited guarantee that the online public service missions of the PSM are fulfilled without distorting competition with private media actors.

3.4. Social Inclusiveness (70% - high risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against disinformation and hate speech.



As in previous years, the **Social Inclusiveness** area scores high risk, due to the weaknesses and lack of independence of local and community media, the failing gender balance of PSM and private media, the lack of a functioning media literacy strategy, as well as insufficient measures to tackle disinformation and hate speech – in the latter two cases also taking into consideration that the government itself is fueling the spread of disinformation and hate speech with its public messaging. The only indicator scoring medium risk is Media literacy.

Representation of minorities in the media (68% - high risk)

This indicator looks at the representation of ethnic and religious minorities in the Hungarian media, as well as access to media provided to people with disabilities. Although measures are taken in both cases, there are still deficiencies, especially when it comes to providing sufficient airtime to minority groups.

In the case of ethnic and religious minorities, article 99 of Act CLXXXV of 2010 on Media Services and on the Mass Media, states that all nationalities recognised by Hungary should have the right to “foster their culture and native language, and to be regularly informed in their mother tongue” through the PSM. Accordingly, there are dedicated shows for all recognised ethnic minorities on the public service media, but these are not always sufficiently accessible (e.g. PSM minority programmes are aired on weekdays early in the morning). The Public Service Codex mentions minorities eight times in its text. Without going into detail, it mentions the promotion of majority and minority points of view, the fulfilment of minority and majority needs, and promotion of minority culture (especially when it wouldn't be covered by mainstream media). However, the description of tasks and values is quite general. Aside from minorities recognised by the law, the Jewish community has a show on PSM devoted to Jewish culture. It was mentioned by experts that

minority programmes are depoliticised and don't cover any of the relevant social issues that would be important for these communities (be it injustices, education, access to healthcare, etc.). News programs are available in foreign languages such as Russian and English. The German-language news focus on the interests of the Hungarian government, but do not consider topics that would focus on the German-speaking minority. There is no news program in Romani language (or one of the Romani languages), even though it could be important not just for the sake of informing the community but to strengthen the relevance of Romani culture in the public discourse.

Private broadcasters don't have programmes specifically aimed at minorities. *Dikh TV* and *Dikh Rádió* cater to the Romani minority, but their content is overwhelmingly focusing on pop music. A small number of small publications online or in print cater to minority groups, also focusing on social and political questions, such as the magazine *Szombat* (Jewish) or the online media *QRTV* and *TV Baxtale* (Romani) (see Bleyer-Simon et al., 2024). The representation of Romani people, the largest minority group in the country, is considered very poor in the national culture (see, among others, Messing & Bernáth, 2017). Müllner (2022) has pointed, based on the case of a controversial video published by *Telex*, at structural bias in independent media towards the Roma community, which stems from the dominance of the privileged white middle-class worldview in mainstream media (across the political spectrum). Müllner's assessment in this paper can also be understood as a critique of the journalistic doctrine of objectivity, which in its current form is strongly shaped by the values of the majority. Members of the Romani community are underrepresented among journalists in large newsrooms, and there is currently a lack of effective projects to provide them with the skills needed to join newsrooms, as most Romani journalists got into the field through support from international NGOs in the 1990s and 2000s (Fülöp, 2023). In the case of minorities not recognised by law, such as immigrants and refugees, their coverage is overwhelmingly negative. The NMHH's report on the representation of minorities includes political and economic migrants among the minorities covered – their share is 8.9 percent of minority coverage in PSM news (compared to 33.7 percent last year) – however, it can be assumed, based on previous reports that the portrayal of this group is biased (the question doesn't ask about bias, only airtime). There are no programmes produced by or for this group (NMHH, 2024d).

When it comes to media access for people with disabilities, legislation is in place and effectively implemented – but some problems still exist. Article 39 of Act CLXXXV of 2010 on Media Services and on the Mass Media specifies that audiovisual media service providers need to provide programmes accessible for the hearing impaired, with subtitles or in sign language. The situation is similar to previous years. There is a legal framework, but some problems remain. We consulted with the representatives of SINOSZ (Hungarian Association of the Deaf and Hard of Hearing) and the Hungarian Federation of the Blind and Partially Sighted (MVGYOSZ). The following tv stations need to be made completely accessible to Deaf and Hard of Hearing people since 2021 (except advertising, teleshopping and previews): *M1*, *M4 Sport*, *Duna*, *Duna World*, *TV2*, *RTL*, *ATV*, *Hír TV*. According to a previous assessment of the media regulator (NMHH, 2022), on average 86% of assessed programmes were made accessible to viewers with hearing impairments. The highest percentages were registered on the PSM and news channels, somewhat lower percentages were reported on commercial channels. In 99.4% of the cases accessibility meant the provision of subtitles. However, some deficiencies remain with the quality of the service, which need to be addressed in the future. For example, the automatic captioning of television shows is not always good. In no paragraph is it stipulated that certain programmes have to be made accessible for children with hearing impairment who are not yet able to read. Dr. Zsanett Laczka, head of SINOSZ wrote that currently all children's shows are subtitled. There would also be a need to improve the visibility of subtitles for older people who may not see that well anymore.

Since 2020, Art. 39 of Act CLXXXV of 2010 requires that shows need to be made accessible for the Blind and Partially Sighted between 18:30 and 21:30. A statement (based on a limited survey) by the Hungarian Federation of the Blind and Partially Sighted (MVGYOSZ, 2021) was published that pointed towards some issues with the existing services: a quarter of the respondents never used to service, which is seen as hard and complicated to access (often only possible with help from others, while the hotline is not reliable). There were also complaints about the quality of the audio narration (not loud enough, audio narration often not adapted to the original sound) and the availability of the service (e.g. re-runs didn't have narration). The Hungarian Federation of the Blind and Partially Sighted (MVGYOSZ) hopes that the number of hours will increase and they expect improved accessibility on mobile devices and online in 2024 and 2025. Dorottya Velegi, acting head of MVGYOSZ highlighted that it is hard to activate the voice narration for Blind and Partially Sighted people without help. The organisation is currently lobbying to extend the hours available for Blind and Partially Sighted people and to make audio narration available for the re-runs of shows. Velegi expects improvements in 2024-2025, as MVGYOSZ is in talks with the Telecommunications Reconciliation Council (HÉT) to make sure that the websites and the mobile apps of audiovisual service providers will be made accessible. She also mentioned that MVGYOSZ collects information on tv shows, theatre performances, movie screenings that are accessible to blind and partly sighted people – the information is crowdsourced and is regularly distributed to the community through newsletters.

Local/regional and community media (79% - high risk)

This indicator scores high risk, due to the limited number of independent local and community media. The most critical segment of local media services is the local analogue radio market. According to the media authority, 385 cable and 37 terrestrial local TV stations operate in the country (NMHH, 2023c), which is a low number compared to the 3100 municipalities, but in practice means that local TV is available everywhere except in the smallest municipalities. The media authority's (contested) register lists 100 local radio stations and 6 district stations. All of the district radio stations are in Budapest, two of them (*Rádió 1*, *Hír FM*) are run by the same radio network. Of the local radio stations, 61 are linked to a network, i.e. only 39 are independent local radio stations. As described in the Local Media for Democracy project (Verza et al., 2024), on the local media markets as a whole, there are very few independent, i.e. non-municipal, non-networked services and press products that are not the product of a complex media company. While this may be positive in terms of the range of content, as it provides a more sustainable economic basis for local media, it is highly problematic in terms of diverse and impartial local coverage. The overwhelming majority of local content production is controlled by the government (see also Mérték, 2023c&d).

There are only a few independent local radios and local independent online media (according to the latest count 11) in the country. They are small; typically one or two journalists work in these small newsrooms. Some of these independent local media joined forces in the *Szabad Hírek* project, to reach audiences interested in local news through a shared platform. Budapest-based outlets like *Átlátszó*, *Magyar Narancs* and *Szabad Európa* also cooperate with local journalists (often the ones running these outlets) and have dedicated sections for local developments. Large local newspapers are part of the government-controlled KESMA network. The financial performance of print media does not look good at all, given that their main source of revenue is still the print publication and circulation is constantly declining. At the same time, their numbers are still considered high compared to the national or Budapest-based media, as older populations still rely on the well-known old newspaper brands to gain information about the world (See Keller-Alánt, 2021). Local radios usually don't produce their own news but republish news blocks produced by the MTVA (which is known to be biased and influenced by the government). As pointed out in Mertek's above mentioned report (Mérték, 2023b). The bias in the KESMA-owned local media is widely reported, as often

the same pro-government content is published in multiple local media outlets simultaneously. In 2019, after Fidesz won the local elections in many municipalities, local media outlets published exactly the same message on Facebook: “We won a record victory with record participation!!!” (KD, 2019). The next local election takes place in 2024.

There is a state subsidy scheme in place. The Media Council Funding Program (Médiatanács Támogatási Program) sponsors local and regional television and radio stations in a tender scheme to cover their overhead costs, technical improvements or the costs of their radio or television programmes. But there is no information about the criteria regarding the distribution of these funds.

The PSM Charter mentions that one of the goals of the PSM is to provide content of local and regional interest (Közszolgálati Kódex, 2016: 23). However, in the years after 2010, all of the PSM's regional studios were closed. To cover local developments, the PSM worked in cooperation with local tv stations. But these television stations are run by local municipalities and are thus politically influenced. After some municipalities were won by the opposition after the 2019 local election, the PSM decided to put an end to its cooperation with the stations of said municipalities (Klubrádió, 2019; Doros, Ungár & Vas, 2019).

Concerns also arise in the case of community radio. Even though the Media Act regulates community media services (e.g. Chapter 4 of Act CLXXXV of 2010 on Media Services and on the Mass Media), in practice this category of media services has lost its original functions. As community media service providers are exempt from media service fees, politically supported talk radio networks and church radios started bidding as community radios. The Mérték Media Monitor analysed radio tenders between January 2018 and April 2021 and found that the winners were in most cases pro-government bidders, both in the case of community and commercial frequencies (Mérték, 2021c). One of the last independent voices, *Tilos Rádió*, a community station based in Budapest, is still operational.

Gender equality in the media (68% - high risk)

The PSM Code of Conduct doesn't mention gender equality. In an interview for the MPM 2024, editor and PhD researcher Veronika Olívia Végh added that other self-regulatory codes in Hungary do not mention gender equality either. At the end of the year 2023, 23% of the members of the PSM management boards and 50% of PSM executives were women. The ratio was similar in private media: 33% of members of management boards and 50% of executives of private television channels, as well as 25% of editors-in-chief of leading news media are women. Bátorfy et al. (2018) found in 2018, based on an assessment of newsrooms focusing on news and current affairs that less than 30% of their journalists were women. No other research has been conducted on the topic since. The topics available for female journalists were also limited: they were often expected to cover topics like family, education, health, culture, and not “manly” topics like economics or politics. However, the past years saw improvements in this area, both in the choice of topics and in women's chances to join management (see Végh, 2022).

The national regulator's latest report on social diversity in the media shows that women account for 24.4 percent of the people shown on television news programmes (in the case of PSM only 21.2), which is a serious underrepresentation (NMHH, 2024d). In an interview for the MPM 2024, editor and PhD researcher Veronika Olívia Végh, whose research focuses on the portrayal of women in the Hungarian media, reiterated the fact that women were underrepresented, adding that the portrayal of women was also stereotypical in many cases. Globsec's study “Women's Voices in the Media: A Look at Central Europe” based on an empirical assessment of news media in Slovakia, Czechia, Poland and Hungary, found that

Hungary's media had the lowest share of articles written by women (25 percent). There is no significant difference between pro-government and independent media (Shevchuk et al., 2022). There is no research on the proportion of experts quoted, women as information sources, or women participating in political programmes. Since March 2023, Ringier Hungary, one of the print publishers, joined the Equal Voice Initiative of its Swiss parent company. They measure qualitative and quantitative mentions of men and women in text, image and video, using a methodology developed by ETH Zurich (Brandfetch, 2023). In the expert interview, Veronika Olívia Végh added that Ringier Hungary had an extensive list of female experts for internal use, which journalists can consult when looking for sources for their articles.

Media literacy (60% - medium risk)

As last year, we need to emphasise that, although there are media literacy measures in the country, these do not add up to a comprehensive strategy, media literacy's inclusion in school curricula has some major flaws (e.g. limited scope, not necessarily in line with the current digital environment's requirements, limited reach, not taught in every school), there is a lack of well-trained teachers, NGOs in this field are underfunded and the media literacy projects don't reach the most vulnerable parts of society. The situation is made worse by the fact that the public service media – which, in a well-functioning media environment, is seen as a key precondition of society's resilience to information manipulation – is itself seen as a publisher of disinformation (see, for example, Urbán et al., 2023). The change in the risk score is largely due to the latest Eurostat data on the share of population with basic or above basic Individuals information and data literacy skills, which is now estimated to be 89 percent, and thus well above the EU average (Eurostat, 2024).

The European Media Literacy Index 2023 puts Hungary in the 3rd cluster (only Cyprus, Greece, Romania and Bulgaria scoring lower, if looking at EU countries) (OSIS, 2023). The media regulator's 2023-2026 strategy mentions media literacy as a priority, but only provides a vague description of activities and goals (NMHH, nd).

Under the 2012 National Curriculum (NAT – the country's educational policy), the stated objective of media literacy education is to “help students become responsible participants in a mediated global public discourse and understand the language of both new and conventional media.” Despite rumoured plans to remove media literacy from the curriculum, the new NAT of 2020 still includes media literacy. The 2010 Media Act (Art. 83) obliges the Media Council to promote media literacy. In 2014, it launched a media and literacy education centre called the Magic Valley. The Magic Valley is active at three locations: Budapest, Debrecen, and Sopron. The Council has also hosted at least one major international conference (Decoding Messages - Best Practices in Media Literacy Education), that involved input from a wide range of international experts.

There are some, mainly foreign-funded, civil society activities as well. The Hungarian Digital Media Observatory, supported by the European Commission, has media literacy among its priority areas. In 2023 it launched a curriculum and a site for children (Detekto.hu) to help recognise fake news. It includes explanatory videos, and interactive tasks (HDMO, 2023a). Telex Academy by the Idea Foundation and the independent newsroom Telex was launched in 2023 (Telex, 2023).

Despite efforts, the overall picture is not good. Nagy (2017) found that teachers involved in media education have limited knowledge of the media industry, and at the time the research was conducted (7 years ago), teachers still underestimated the impact and reach of online media. A 2016 Report on Media Education in

Hungary by the Office of the Commissioner of Fundamental Rights (OCFR – ombudsman) has raised constitutional concerns, as the existing media literacy measures didn't provide sufficient measures for the protection of children. The text argued that the country's media literacy strategy was not well implemented, and the measures are not in line with its stated goals. The ombudsman also argued that there is evidence that neither the parents nor the children have a sufficient understanding of the threats posed by the online environment.

The text also mentions that media literacy (Media literacy and moving images) was taught as part of other subjects such as ethics, religious studies, basic social studies, arts, and visual culture and there weren't enough qualified teachers in the country. The technological infrastructure of the educational institutions was outdated, most schools in the countryside have limited access to the internet. The computers used in schools have the most basic system requirements, many of the textbooks and auxiliary materials should also be updated or revised. Our expert interview underlines that the problems were still seen as concerning. Moreover, Lannert and Hartai (2021) found that, despite the existence of a media literacy curriculum, half of the schools sampled had no media education in the 2018/2019 school year. In a quarter of the schools, media literacy was integrated into another course, and in only 10% of the cases was there a standalone course on media literacy. According to a 2023 survey by the conservative Fiatalok a Nemzetért Alapítvány (Youth for the Nation Foundation), most of the young people surveyed believe that there is not sufficient media literacy education in schools (66 percent say not enough, 16 percent say enough, 18 percent don't know) (Fiatalok a Nemzetért Alapítvány, 2023). News literacy is often neglected in media literacy activities.

Teacher training is available, but not viable. The university-level training takes 5 years to complete, while past rumours about the possible removal of media literacy from the national curriculum discourage many prospective applicants. The measures aimed at marginalised communities are lagging behind. In a paper on media literacy measures in Hungary, Lannert and Hartai (2021) argue that those teachers that work with vulnerable populations have, on average, worse technological skills and less knowledge of the latest methodologies and approaches than the general population of teachers.

Protection against disinformation and hate speech (90% - high risk)

Disinformation is often embraced, amplified by, or even originates from, the government or pro-government news media. In the past years, Russian-origin disinformation was shared on Hungarian blogs, news websites, television stations, and even the PSM (Bayer, 2022; Zöldi, 2022, Kapronczay, 2022, Szebeni, 2022, Német, 2022, Urbán et al., 2023, Bleyer-Simon, 2023). At the same time, vaccination-related disinformation has become a fringe issue (Political Capital, 2023).

In 2023, "disinformation" appeared as a legal category in the Hungarian legal system. The previously mentioned Act on the Protection of Sovereignty defines the tasks of the Office for the Protection of Sovereignty as including the detection of information manipulation and disinformation activities, if they may infringe or threaten the sovereignty of Hungary. In principle, this power also allows action against the spread of disinformation abroad, i.e. by Russia and China, but neither the intention of the legislator nor the concept of the head of the Office is aimed at this (see HírTV, 2024). There is no experience of the application of the law yet, but Hungarian rights defenders (Helsinki, 2023) and journalists (Lakmusz, 2023), as well as the Venice Commission, consider that the law poses a serious risk of stifling voices critical of the government. In the past, government-aligned media and think tanks regularly identified independent media, and even mainstream foreign outlets like the *Washington Post* as sources of disinformation (see Bleyer-Simon, 2021).

The Hungarian media regulator, NMHH, has some projects that aim at countering disinformation, but they do not have a major impact, as it is a politically controlled organisation. At the same time, there are fact-checking organisations, media literacy activities, and civil society actions that aim at countering the harmful effects of information manipulation – even if their funding is limited. The country’s first dedicated, independent fact-checking site, called Lakmusz.hu, was launched in 2022 with the support of EDMO (the European Digital Media Observatory) and the European Commission, relying on the expertise of the French news agency Agence France Presse (AFP). Lakmusz has become a verified member of the European Fact-Checking Standards Network (EFCSN) (HDMO, 2023b). AFP’s Hungarian-language fact-checking site Ténykérdés has been available since 2021. The Hungarian public service media has launched its own fact-checking service (Hirado.hu, 2022), which, however, is seen as providing politically motivated commentary instead of objective fact-checking (Diószegi-Horváth, 2022). Aside from disinformation in the news media, pro-government actors are getting more active in social media as well, for example through the influence group Megafon. Political Capital uncovered an increasing extent of activities by fake accounts on social media (Ember, 2023).

In the case of hate speech, there is a legal framework in Hungary, but there are still deficiencies – in part because the legal framework doesn’t put a great enough emphasis on protecting vulnerable groups, while it explicitly mentions the protection of the majority. Moreover, hate speech has not been the subject of clear practice since the 1990s. Rather, this has led to a situation where no convictions are handed down in such cases because the police or prosecutors do not allow cases to proceed to court. However, the few judgments available are contradictory and unclear.

Hate speech is addressed in Article 332 of the Criminal Code (Act C of 2012). Changes were made to the text in October 2016, in compliance with the EU Council Framework Decision on Combating Racism, expanding the provision to include “incitement to violence” alongside “incitement to hatred”, and it also included protections in cases where individual members of protected groups are targeted. The Civil Code’s (Act V of 2013) Section 2:54 (5) says: “Any member of the community may enforce his personality rights within a thirty-day term of preclusion from the occurrence of a legal injury that was committed with great publicity in relation to some essential trait of his personality, his belonging to the Hungarian nation or some national, ethnic, racial or religious community, and is grossly offensive to the community or unduly insulting in its manner of expression [...]”.

Official statistics on hate speech are considered inaccurate and are likely underreporting the problem (Political Capital, 2024). In its latest assessment the Council of Europe’s European Commission against Racism and Intolerance (ECRI) pointed at deficiencies related to the protection of LGBTQI and Romani people from hate speech (ECRI, 2022). In its assessment of the hate speech framework, Article 19 (2018) writes “The list of protected characteristics in the Civil Code is exhaustive and includes the Hungarian nation, national, ethnic, racial, and religious groups. Other groups – e.g. LGBTQI people or people with disabilities – are excluded from protection.” The 30-day statutory limitation for initiating legal action is also seen as extremely short. The report also states that “barely any reported incidents are considered as falling within the scope of the criminal provision contained in Section 332 of the Criminal Code. The National Chief of Police order 30/2019 (VII. 18.) on the tasks of the police in relation to responding to hate crimes (revised Investigative Protocol) is a policy that is widely praised, but is not effective in practice. Law enforcement agencies tend to conclude that the expressive conduct did not constitute a call for a violent act and did not create a direct threat of danger, thus criminal proceedings are terminated at the investigation phase or the prosecution drops the charges (as Bulcsú Hunyadi and Veronika Szontagh, experts of the Political Capital

think tank told us). The Media Council can impose administrative sanctions in case media outlets publish content that can be considered hate speech – but it rarely acts on them. The passing of Act LXXIX of 2021 Amending Certain Acts for the Protection of Children has contributed to the spread of homophobic narratives, for example by equating homosexuality with pedophilia, while many of the government's communication campaigns are characterised by xenophobic narratives against immigrants. Government-friendly media outlets and the PSM often amplify these messages. The law also prescribes that printed books offering sexual content or making reference to homosexuality, including classic prose and poetry, should be displayed in a sealed plastic foil in bookstores, which provision has resulted in a number of controversies in 2023. In November 2023, visitors under the age 18 were banned from entering the World Press Photo exhibition, as five photos were portraying the life of a community of elderly LGBTQI people, which was considered to be in violation of the law (Spike, 2023).

Focus on the digital environment

Local media and minority media are freer online than in other media sectors, but their number is small. The representation of women in online media has similar deficiencies as in the media overall, the share of female managers is low, the portrayal of women in the media is often stereotypical. The share of the population with basic or above basic Individuals information and data literacy skills is now estimated to be 89 percent, and thus well above the EU average, still, media literacy activities are considered insufficient and disinformation continues to cause problems online and offline. One of the main sources of disinformation is the government, through captured media and loyal influencers.

4. Conclusions

In the MPM2024 we recorded many of the same problems we had witnessed in the past years. The laws concerning media are increasingly ambiguous, access to information is made harder, while the media market is distorted by media capture through ownership by government-aligned investors and the unfair allocation of state advertising. Local media are especially vulnerable. With the proposal and passing of the so-called Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty), observers expect increased pressure on independent newsrooms – as it can be used to penalise independent outlets for their reliance on foreign grants, which are a relevant source of revenue for many of them.

In the MPM2024, as last year, three areas scored high risk: Market Plurality, Political Independence, and Social Inclusiveness. Fundamental Protection registered a medium risk score. The European Media Freedom Act (EMFA), which is to become part of Hungarian law, deals with a number of issues that are also in the Hungarian media sphere, among other things, the lack of independence of the public service media, the misuse of state advertising as an opaque state subsidy, high concentration in the market or the surveillance of journalists. As such, we ask the Hungarian government to conduct its media-related actions in the spirit of this regulation. While there have been very few developments in 2023 that would have affected the scores, a new threat emerged to journalism, in the form of a high number of DDoS attacks that were reported on independent newsrooms (IPI, 2023), and a number of pro-government media decided to end their membership in the Hungarian Newspaper Publishers' Association (MLE), signalling a further weakening of self-regulatory bodies.

We provide the following area-specific recommendations to key stakeholders on the EU and national level (many of which are reiterated from last year):

Fundamental Protection

- The Office for the Protection of Sovereignty should be abolished in line with the Venice Commission's recommendation. Any future restrictions on the freedom of expression of journalists and civil society organisations should in any case be regulated by laws that are as clear and unambiguous as possible and as narrowly tailored as possible to a genuine constitutional need.
- The government should undertake a thorough reform of Hungarian media regulation, taking into account the criticism coming from international organisations. The most important expectations are set out in the Venice Commission's 2015 evaluation and recommendations, to which the Hungarian government and the Parliament have not responded at all. The government should also follow the EMFA and the accompanying recommendations of the Commission.
- To secure the independence of the national media authority, a regulatory solution is needed to prevent members of the Media Council from being solely elected by the governing party. We also recommend that the Fundamental Rights Agency continuously monitor the practices of the Hungarian media authorities to identify biased decisions.
- Any refusal to provide public interest information should be subject to strict conditions. The trend towards increasingly restrictive regulation needs to be reversed; relevant laws should strengthen the public's and news media's access.

- We ask the news media to work towards strengthening professional self-regulation and professional solidarity organisations.

Market Plurality

- We recommend that national regulatory bodies receive greater and clearly defined authority to monitor cross-ownership concentration.
- The EU or the state should support independent media with grants and other funds in a fair and transparent manner, also taking into account the lack of core funding for independent media in Hungary, which cannot be replaced by project-based funding.
- EU rules related to anti-competitive behaviour should consider the market-distorting effects of KESMA and other dominant government-aligned media owners.
- The government should support the press and Reproress in its efforts to secure compensation from online platforms. The government also needs to be more constructive when working towards international measures for the taxation of global technology companies.

Political Independence

- The European Commission must take a decision on the state aid case launched in 2019, which aims to declare that discriminatory state advertising practices in Hungary violate European law, taking into account the actual market situation and practices.
- Authorities should assess state advertising spending based on state aid rules. For the normal functioning and plurality of the Hungarian media system, it is essential that the extent and market weight of state advertising is significantly reduced. Additionally, in order to prevent the misuse of state advertising, a supervisory body should function alongside recipient media outlets. This would monitor the use of funds and would make sure that with time the proposition of state funds doesn't make up the dominant share of a news outlet. The distribution of state advertising should take into account the audience share of each medium and the specificities of the audience it reaches. In all cases, the inclusion or exclusion of certain media from public campaigns must be duly justified. Public procurement in itself does not solve the transparency problem of state advertising.
- Political and issue-based advertising on social media needs to be regulated in a clear and transparent way.
- We ask the government, ministries, and other state bodies to respect the editorial independence of newsrooms, including the PSM, and refrain from interfering with content production.
- We propose a reform of the institutional system of public service media that provides real guarantees of political independence. The current institutional framework is not at all suited to this, nor would any change to it be effective. The institutional framework for public service media must be placed on a

completely new fundament, starting with the abolition of the current institutional framework.

- The EU should consistently apply state aid law, both in relation to the financing of public service media and the allocation of state advertising.

Social Inclusiveness

- Hate speech must be consistently tackled by the police, prosecutors, and the courts, even when the source is government communication.
- The government needs to stop the production and financing of disinformation - even if its spread furthers its short-term political goals. This is especially important in the context of election campaigns.
- News media should work on empowering vulnerable and underrepresented groups of society, including women and minorities.
- Local stakeholders should work on strengthening journalism education (including journalism education as a standalone Master program) and media literacy training (including news literacy in the curriculum), as well as improving the quality and reach of media literacy activities (and fostering the participation of journalists and newsrooms in such programmes).

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- Bulcsú Hunyadi, Head of Radicalisation and Extremism Programme at Political Capital Institute
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- Péter Hivatal, President of Society Reppress for the Reprographic Rights of Publishers (Reppress)
- Tibor Kovács, President of the Hungarian Publishers' Association (MLE)
- Zsanett Laczka, Director at Hungarian Association of the Deaf and Hard of Hearing (SINOSZ)
- András Müllner, Habil. Associate Professor at the Institute for The Theory of Art and Media Studies, Eötvös Loránd University
- Krisztina Nagy, legal expert, lecturer at the Technical University Budapest, Founder of the Idea Foundation
- Attila Szabó, legal officer at Társaság a Szabadságjogokért / Hungarian Civil Liberties Union
- Veronika Szontagh, Analyst at at Political Capital Institute
- Veronika Olívia Végh, editor and PhD researcher, Eötvös Loránd University
- Dorottya Velegi, Acting Director at Hungarian Federation of the Blind and Partially Sighted (MVGYOSZ)
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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Konrad</i>	<i>Bleyer-Simon</i>	<i>Research Associate</i>	<i>European University Institute</i>	X
<i>Gabor</i>	<i>Polyak</i>	<i>Professor, Head of Department of Media and Communication</i>	<i>Eötvös Loránd University</i>	
<i>Agnes</i>	<i>Urban</i>	<i>Associate professor and Chair of the Infocommunications Department</i>	<i>Corvinus University of Budapest</i>	

ANNEXE II. GROUP OF EXPERTS

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

First name	Last name	Position	Institution
<i>Krisztina</i>	<i>Rozgonyi</i>	<i>Associate professor</i>	<i>University of Vienna, Media Governance and Media Industries Research Lab</i>
<i>Levente</i>	<i>Nyakas</i>	<i>Head of Institute</i>	<i>Institute for Media Studies at National Media and Infocommunications Authority</i>
<i>Gábor</i>	<i>Kardos</i>	<i>Board Member</i>	<i>Magyar Lapkiadók Egyesülete / Hungarian Publishers' Association</i>
<i>Ferenc</i>	<i>Kéry</i>	<i>President</i>	<i>Magyar Kommunikációs Szövetség / Hungarian Communications Association</i>
<i>Bea</i>	<i>Bodrogi</i>	<i>Legal Expert, Human Rights Lawyer</i>	
<i>Éva</i>	<i>Simon</i>	<i>Senior Advocacy Officer / Tech & Rights Lead</i>	<i>Civil Liberties Union for Europe (Liberties)</i>
<i>Ferenc</i>	<i>Vicsek</i>	<i>Vice-President</i>	<i>National Association of Hungarian Journalists (Magyar Újságírók Országos Szövetsége)</i>
<i>Zsuzsa</i>	<i>Detrekői</i>	<i>TMT lawyer, part-time academic and digital media expert</i>	<i>Media & Journalism Research Center</i>
<i>Zselyke</i>	<i>Csáky</i>	<i>independent media and policy expert</i>	

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