

# MONITORING MEDIA PLURALISM IN THE EUROPEAN UNION

## RESULTS OF THE MPM2025

Country report: Hungary

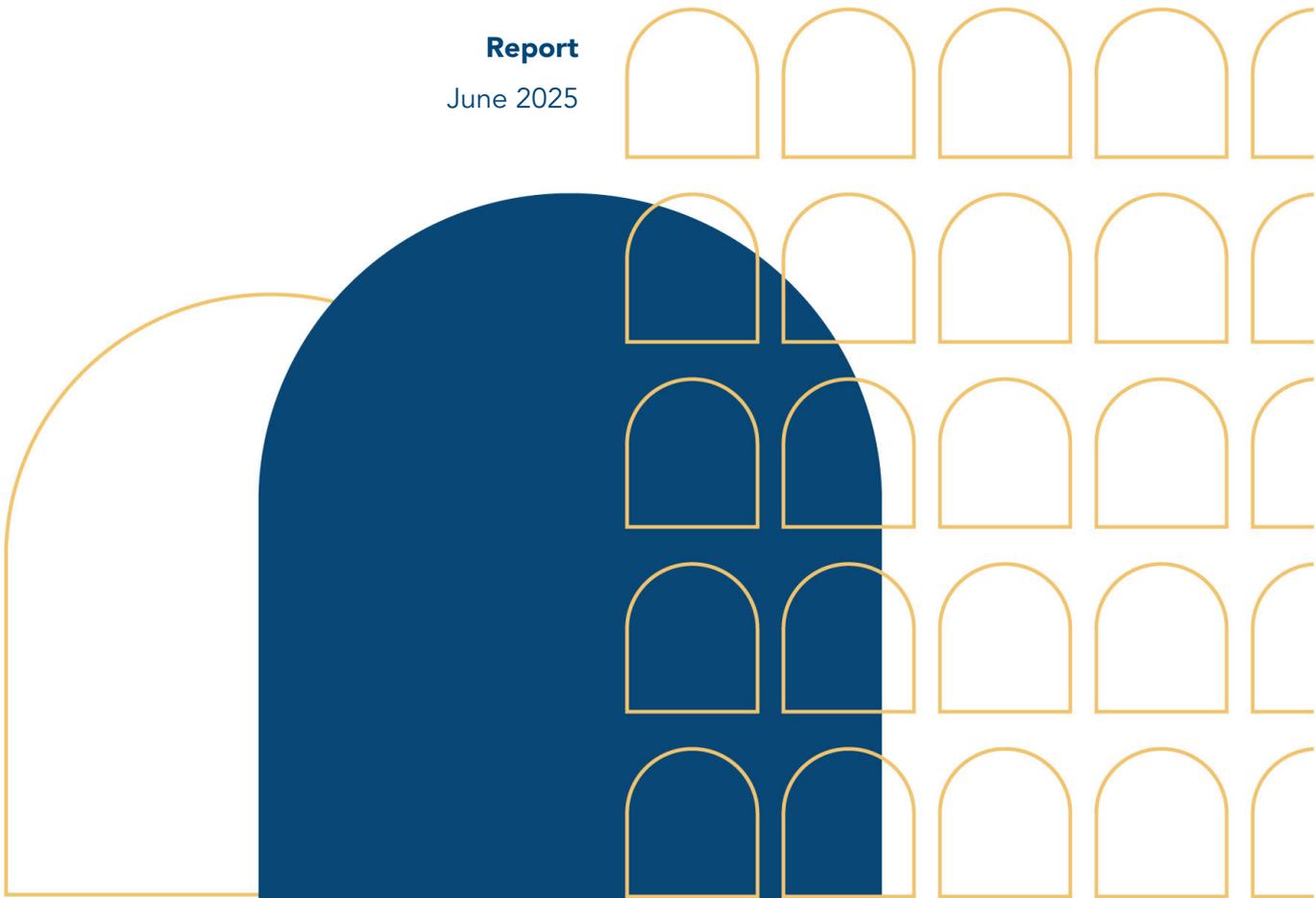
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**Report**

June 2025



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## 1. Note from the MPM team

The *Media Pluralism Monitor* underwent significant transformations in 2025. First, the risk assessment was expanded from a three-tier - low, medium, and high risk - to a six-tier system, as follows:

- Very low risk (Rounded score comprised between 0 % and 16% included) - represented in green
- Low risk (Rounded score comprised between 17% and 33% included) - represented in light green
- Medium-low risk (Rounded score comprised between 34 % and 50% included) - represented in yellow
- Medium-high risk (Rounded score comprised between 51% and 66% included) - represented in orange
- High risk (Rounded score comprised between 67% and 83% included) - represented in red
- Very high risk (Rounded score comprised between 84% and 100% included) - represented in bordeaux

The adoption of the six-tier system aimed at providing a more granular assessment of the risk to media pluralism and freedom. This increased granularity also aimed at shifting from percentage-based risk reporting to risk-band reporting, that allows more comparability over the years, giving the constant changes of the MPM questionnaire.

The structure of the MPM report also changed. It is now composed of three parts as follows:

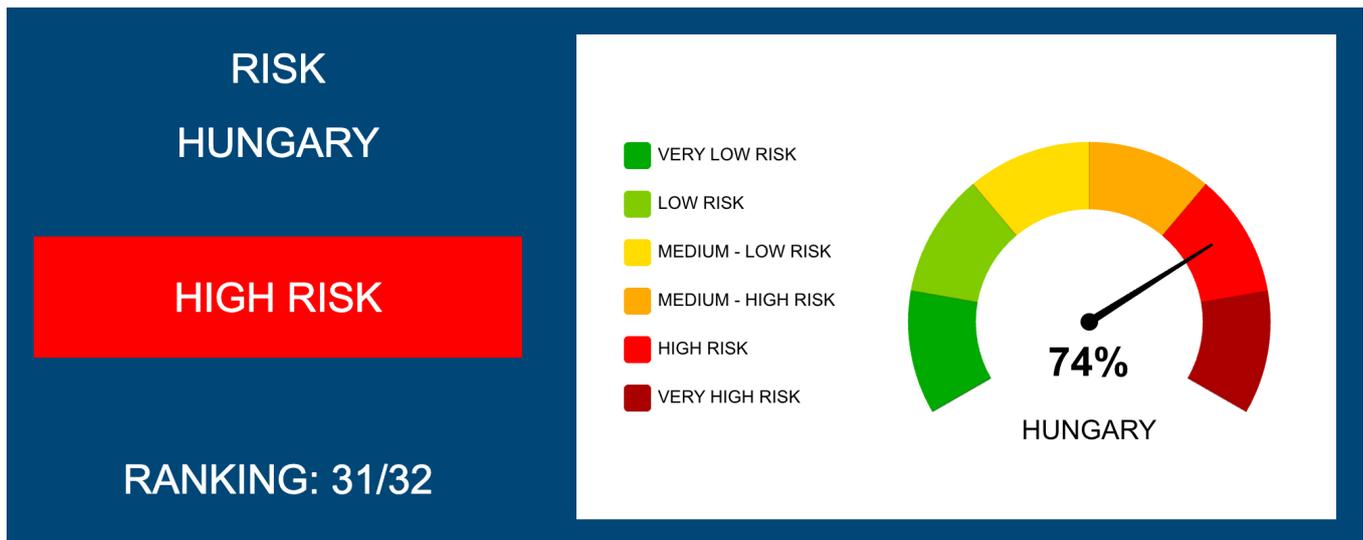
- **Results snapshot** - provides an executive summary of the risks to media pluralism and freedom in the country studied.
- **In-depth results** - provides a more detailed overview of the MPM results per area, including some specific recommendations for each country
- **EMFA Observatory - Year 1 : Before the implementation** - provides a summary of the risk assessment on specific topics that are in line with the content of the European Media Freedom Act (EMFA), which will enter into full force in August 2025 in European Member States. Most of the standards mentioned in the EMFA were already monitored in the past editions of the MPM. This purpose of this section is to increase their visibility.

For specific changes in the questionnaire, please refer to Part 6 - *MPM Methodology*.

**For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire considering the evolution of the information and media sphere, the existence of newly available data, and based on the regular evaluation of the tool after its implementation. The methodological changes are explained on the CMPF website at**

**<http://cmpf.eui.eu/media-pluralism-monitor/>.**

## 2. Results snapshot



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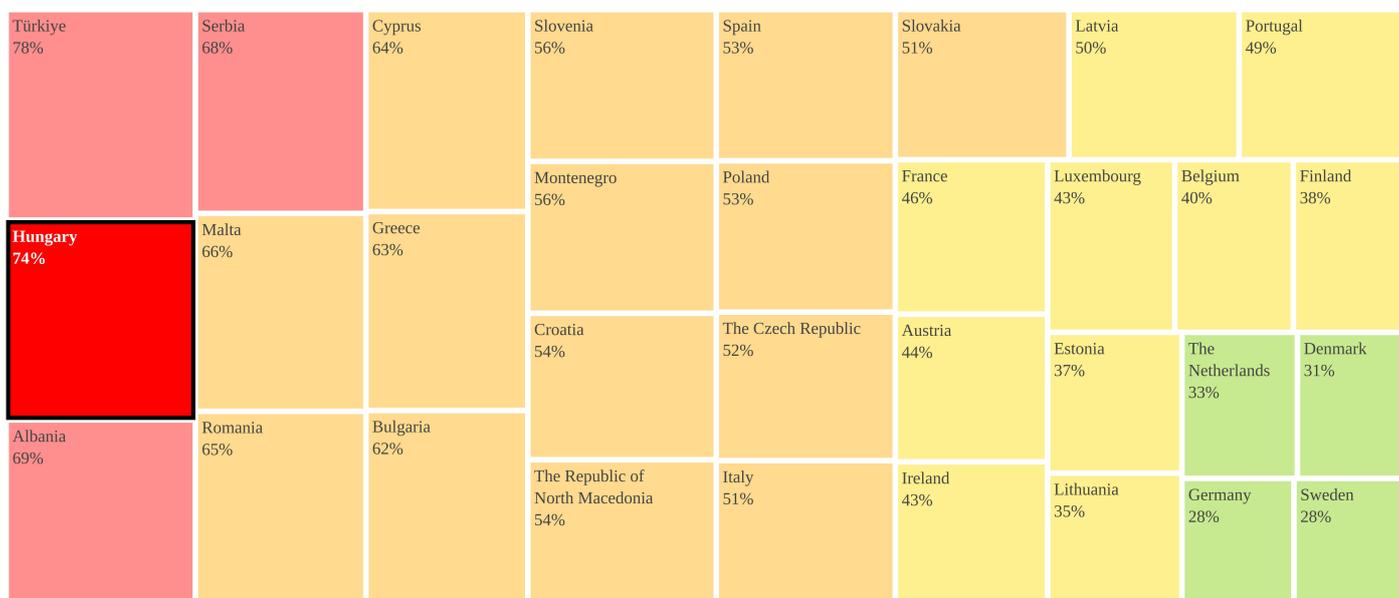
### Country overview

Media pluralism and media freedom are under immense pressure in Hungary. The country is a parliamentary democracy, but analysts and researchers have cautioned for the past decade about a trend of democratic backsliding, 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 Viktor Orbán since 2010. The year 2024 saw European and municipal elections, as well as a reorientation of the political sphere, with the emergence of Tisza, a conservative political party, led by Péter Magyar, a former ally of Orbán, who repositioned himself as an anti-corruption actor. By late 2024 and early 2025, Tisza's support was close to that of the governing party, while the older opposition parties lost significant shares of their support.

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 & 2017). 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 formally 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 (2024) only 23% of respondents trust "most news most of the time" (DNR, 2025) – which is the lowest among the countries assessed. The audience is polarised, meaning that a sizable segment of media audiences consume media according to their political preferences (Polyák, Urbán, Szávai, 2022).

The Hungarian media sphere extends beyond the borders of Hungary. The public service media (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). It was revealed in 2024 that the Hungarian government also has a financial stake in the pan-European *Euronews* channel (Pethő et al. 2024).

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) – it is considered to be controlled by the government (IPI, 2024). The greatest concerns related to media freedom are related to the Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty) – this law created the Office for the Protection of Sovereignty, which investigates, 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. The Office has extensively targeted the investigative news media *Atlatzo.hu*. While not yet part of our assessment, it has to be highlighted that in May 2025, members of the governing party submitted a new bill on the “Transparency of Public Life” which would further restrict the ability of independent news media and non-governmental organisations to receive funding (Uitz, 2025).



**Fundamental Protection** falls into the medium-high risk category, very close to the border with high risk. While there are still effective protections for freedom of expression and journalism – mainly remnants of the reforms prior to 2010 – the general state of journalistic protections is weak.

- Cases of SLAPP appear regularly – in 2024, one of the actors suing the media was the Prime Minister.
- Smear campaigns are common – both by the governing party and the newly emerging opposition candidate.
- Hungarian law provides lots of opportunities for authorities to surveil journalists.
- Access to data is getting harder – authorities have numerous means to withhold information from data requesters.
- The government and allied actors are often the sources or amplifiers of disinformation.
- The media regulator is under the control of the government.

**Market Plurality** scores very high risk, as the media market is extremely concentrated and the revenues of news media are not sustainable.

- The television and print newspaper markets are especially concentrated.
- The digital market is dominated by large tech companies that do not participate in content-creation themselves. Efforts to start collective bargaining between Google and news media failed in 2024.
- Most media sectors experience declining revenues over the years, while innovations could not provide solutions for long-term sustainability, so far.
- The use and availability of foreign grants has become uncertain, following some of the latest political developments – such as the introduction of the Sovereignty Protection Act, and the unavailability of U.S. state grants.
- Subsidies to the media are not available to significant segments of the market.

## POLITICAL INDEPENDENCE

HIGH RISK

The **Political Independence** area has an average score of high risk, as the Hungarian governing party poses a significant threat to independent journalists.

- Significant parts of the media landscape are directly government-controlled.
- Journalistic self-regulation is weak and doesn't provide protections against political interference.
- The elections of 2024 made it again visible that the governing party outspends all other political actors during political campaigns.
- During the election campaigns of 2024, the PSM showed the governing party's advertisements disguised as news blocs.
- State advertising (including advertising by state-owned companies) is excessive, and it is used to reward allied media outlets.
- The public service media is controlled by the government and is weaponised to target critics of the government. Similarly, government-aligned private media are openly hostile towards opposition or independent actors.

## SOCIAL INCLUSIVENESS

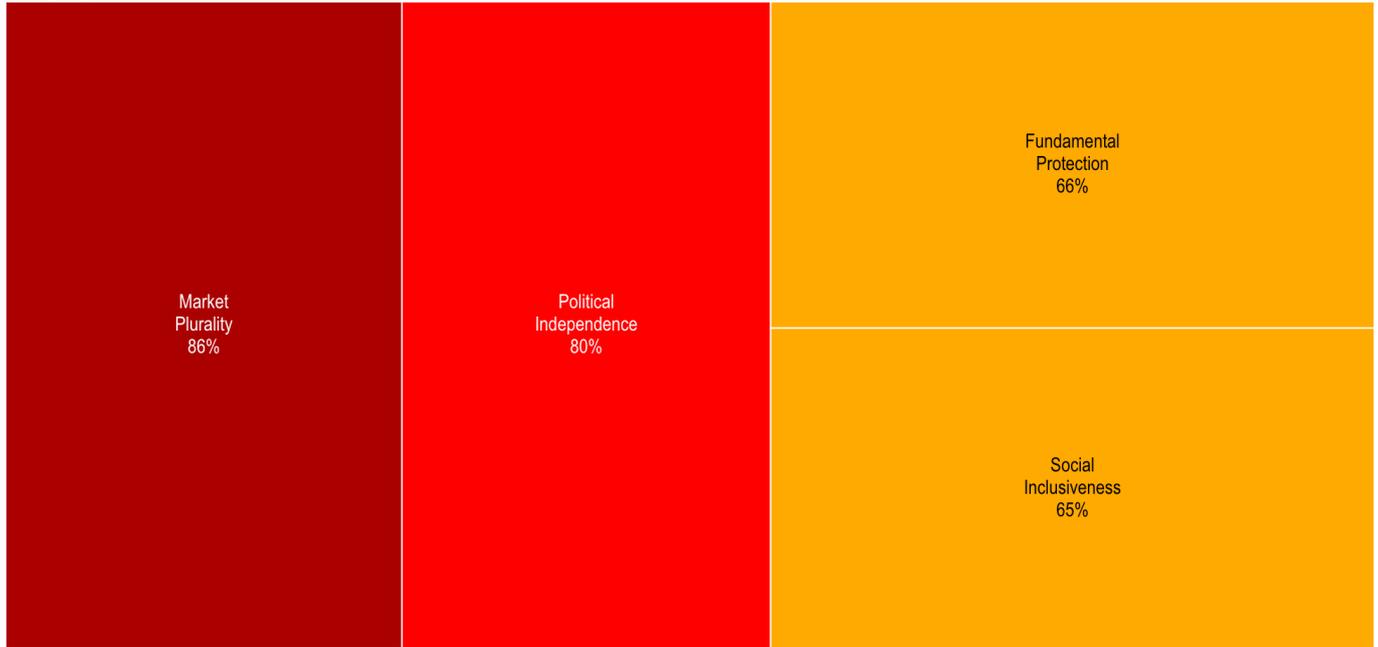
MEDIUM - HIGH RISK

The **Social Inclusiveness** area scores medium-high risk, very close to high risk. The representation of vulnerable groups in the media is especially problematic.

- The portrayal of minorities, and marginalised groups is stereotypical – in the case of LGBTQ people and immigrants/refugees, extremely hostile.
- Broadcasters took measures to make their services accessible to people with disabilities, but the quality of measures is insufficient.
- Community and local media are either under the control of or pressured by the government.
- Women are underrepresented in media management.
- Media literacy education exists but is not widespread enough and does not cover vulnerable groups sufficiently.

### 3. In-depth results

Hungary

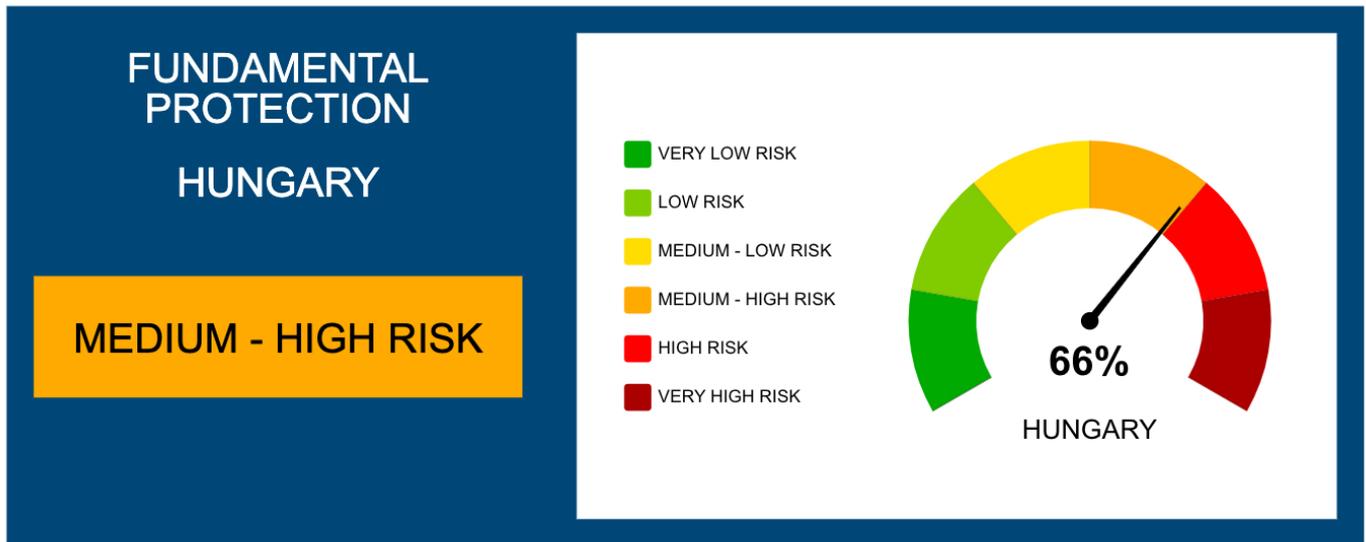


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All areas of media pluralism show significant deficiencies in Hungary. The **Fundamental Protection** area's weaknesses include that journalists are not protected from state surveillance, disinformation is generated by the government, access to information is constrained and the media regulator is under political control. In addition, the Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty) provides opportunities for the government to label independent newsrooms as threats to the country's sovereignty – this makes the work of independent media extremely hard, not to mention that it also limits news media's funding opportunities, as certain sources of revenue could be considered tainted. The **Market Plurality** area scores very high risk, as the media market is very concentrated, editorial autonomy is not respected and the sustainability of news media is threatened by the dominance of technology companies. There are barely any media-specific provisions that would focus on the transparency of ownership, but thanks to the regulation of other sectors and the work of investigative newsrooms, the public is informed of the owners and ultimate beneficiaries behind news media. Another one of the great vulnerabilities of the Hungarian media landscape is **Political Independence**. A large segment of the political landscape is controlled by the governing party. The use of political advertising as a hidden subsidy to allied news media is especially worrying – along with the weaponisation of the public service media. Finally, there are also numerous shortcomings in the area of **Social Inclusiveness**. The representation of minorities and vulnerable groups is stereotypical, and these groups are barely involved in the process of news production. Women are extremely underrepresented, while local media are either government-controlled or struggle to make ends meet. The levels of media literacy are also low, and there is not sufficient activity to improve the situation.

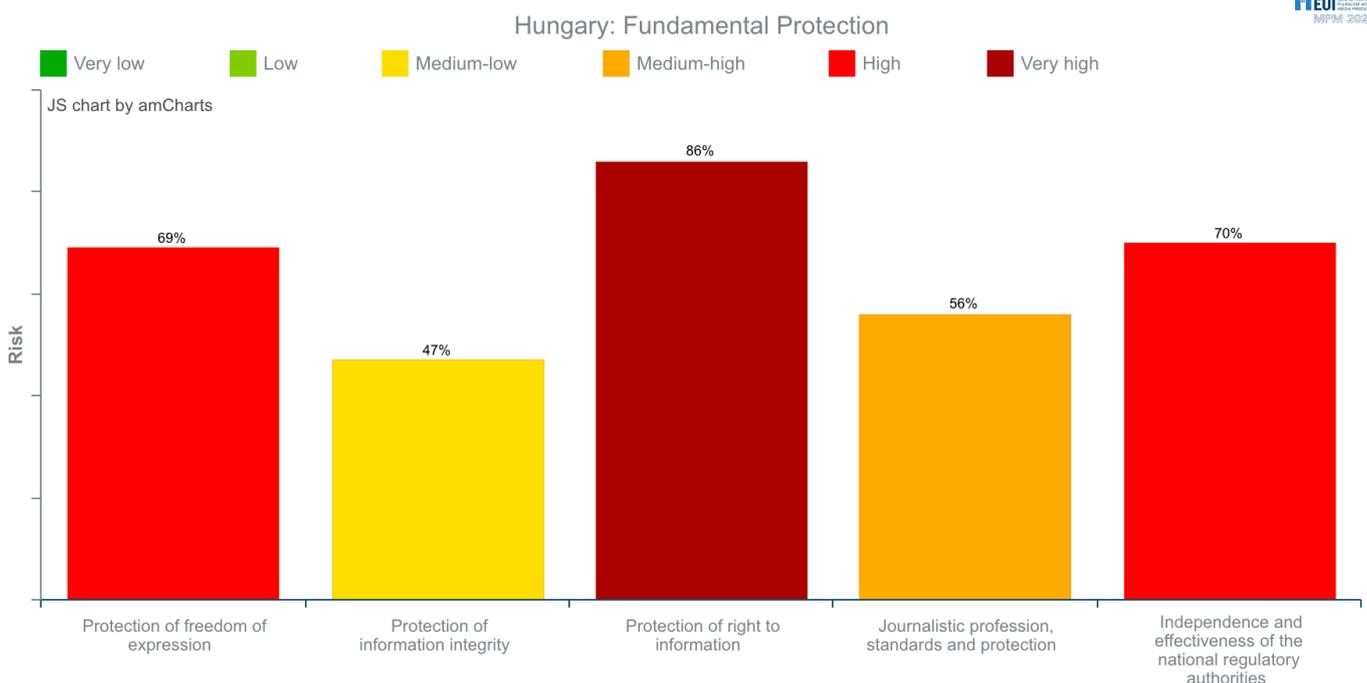
### 3.1. Fundamental Protection

The *Fundamental Protection* area considers the necessary preconditions for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression; the right to seek, receive and impart reliable and accurate information; favorable conditions for the free and independent conduct of journalistic work; the presence of independent and effective national regulatory authorities.



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The **Fundamental Protection** area highlights a number of vulnerabilities in the Hungarian media landscape. Journalists are not protected from state surveillance, disinformation is often generated by the government, access to information is constrained and the media regulator is under political control. In addition, the Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty) provides opportunities to the government to label independent newsrooms as threats to the country’s sovereignty. Act XXV of 2023 transposed the Whistleblower Protection Directive, but it has been criticized for its erroneous implementation (K-Monitor & Transparency International, 2023).



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MPM 2025

The Constitution (called Fundamental Law, since 2011) protects, in its wording, freedom of expression and freedom of the press. Some laws are clear in defining the legitimate limits of freedom of expression – these are the ones with a longer history and a broad judicial practice. At the same time, the criminal law provisions on defamation and libel are still not accompanied by a mature case-law. Ever since COVID-19, the government has been maintaining its excessive emergency regulatory powers (the war in Ukraine is used as a justification), while the Constitution was amended to concentrate powers in the hands of the government in all special legal order regimes. Due to the lack of clear limits in such circumstances, communicators take risks with their statements. Citizens have legal remedies in cases of infringement of their freedom of expression but the remedies are not always effective, mainly because of the shortcomings in the independence of the Public Prosecutor's Office and the Constitutional Court.

### Issues requiring particular scrutiny:

- Defamation may be punished with imprisonment – but from 2023 only for non-journalistic communication (communication that wasn't done through registered press publications). Still, in practice, sufficient legal defenses exist, and the amount of damages awarded for defamation in civil actions is not disproportionately high.
- There is no anti-SLAPP legislation. In 2024, Prime Minister Viktor Orbán had filed civil lawsuits at the Metropolitan Court against several Hungarian media outlets, because they reported about a story that ran in an Austrian media outlet – claiming that the Prime Minister put pressure on the Spar supermarket chain (MAPMF, 2024a). The PR agency Lounge Group was threatening *Szabad Európa*, Radio Free Europe/Radio Liberty's Hungarian Service, with a lawsuit (MAPMF, 2024b). At the same time, in 2024, there were two cases in which courts made favourable decisions for media that were "SLAPPED" by rich Hungarians. In both cases, the General Data Protection Regulation / GDPR (Döbrentey et al. 2024, TASZ, 2024a) was used as a pretense to force the magazine Forbes to remove people from the outlet's rich person list. The sectoral rules related to the processing of data for journalistic purposes were not amended.
- In addition, multiple smear campaigns were launched against media outlets, and the journalists of Magyar Hang were subjects to lie detector tests (described in more detail in the next section) – these are technically not SLAPPs, but they can have similar chilling effects as SLAPPs, as these can all be considered retaliations for critical articles published. It is especially worrying that the strongest opposition candidate, Péter Magyar, also made a number of statements that discredit independent media (MAPMF, 2024b).

Online platforms have the same policies in Hungary as in other EU member states, and there are still

occasional cases of arbitrary content moderation. The number of moderators with Hungarian language skills is low, in the case of some platforms nonexistent. The most prominent platform in Hungary is still Facebook (especially for media and politicians). There is limited information about platforms' content regulation decisions. We can only rely on the aggregated responses provided by platforms in their DSA transparency reports and in the bi-annual reporting available in the Code of Practice on Disinformation transparency centre. We heard about a number of cases in which online users whose content is moderated didn't receive adequate (sufficiently detailed) justification for the actions taken. Hungarian users have access to the Appeals Centre Europe, as well as the Hungarian out-of-court dispute resolution body, the so-called Online Platform Vitarendező Tanács. Hungary is one of the very few countries where such a body existed in December 2024 (Szalay, 2024a). However, the Hungarian body is not an independent body, as required by the Digital Services Act (Art. 21), but an institution directly operated by the media authority NMHH.

There is no national strategy on disinformation. The term is mentioned in some laws or policy documents, but no effective action is taken. The HDMO-CEDMO-BROD Survey "Disinformation and Conspiracy Beliefs in East-Central Europe" found that "Hungarian society exhibited a chronic susceptibility to disinformation and conspiracy narratives" and that members of Hungarian society were concerned that interferences originate both from Russia and the United States (Political Capital, 2024a). A small number of independent initiatives exist to monitor and debunk disinformation, and to conduct research on disinformation. There are, for example, some independent fact-checking projects with high ethical standards, but more of them (or more resources) would be needed. The European Digital Media Observatory has a local hub called Hungarian Digital Media Observatory. The most well-known fact-checking organisation is *Lakmusz.hu*.

### **Issues requiring particular scrutiny:**

- The regulatory environment related to content removal and online traffic management is not fully transparent; moreover, the government's increasing control over ISPs (for example through the acquisition of Vodafone in Hungary – now "One") can provide an opportunity to interfere with the availability of content.
- It seems like the government is not pushing social media to moderate content in an arbitrary way. However, Google's transparency reports of the past years show a small number of governmental content removal requests related to "government criticism".
- There are cases in which content is arbitrarily flagged or removed. Among others, the profiles of orthodox rabbi Slomó Köves and the *NeoKohn* Jewish news media site (owned by Köves' religious community) were blocked for several days. The justification of Meta was the alleged sharing of content in support of the terrorist group ISIS – in fact, the articles were simple reports based on content by the Hungarian news agency.
- Disinformation is widespread in the country, with a documented impact on public opinion (Political Capital, 2022, 2024b, Lakmusz, 2023). Gendered disinformation is also a major problem (Di Meo & Hesterman, 2023). The government is considered a source of disinformation, while the government-captured public service media, and many government-aligned private news media outlets are seen as amplifiers of disinformation. Disinformation in the media is often combined with defamation against the critics of the government (Bleyer-Simon, 2023). Falyuna (2024) found evidence of significant online activities by groups of conspiracy theorists, promoters of alternative medicine and alternative scientific discourses. Recently, one of the popular narratives is the promotion of gay conversion therapies (Fülöp, 2024a).

- While foreign actors are not considered especially active in the Hungarian disinformation environment, government-aligned outlets (including the public service media) often use Kremlin-backed media as the source or motivation for the content they publish (Urbán et al., 2023, Németh, 2022&2025a, Zöldi, 2022). So far, the reports of the European External Action Service (EEAS, 2023 & 2024) did not report foreign information attacks aimed at Hungary or foreign disinformation campaigns conducted in Hungarian language (data on the year 2024 are not published yet). At the same time, it was reported in the Hungarian media that Russian hackers infiltrated the networks of the Hungarian Foreign Ministry (see Panyi, 2022). The authorities downplayed the severity of the incident, but leaked documents show that this was a significant security breach (Insight Hungary, 2024).
- There are no meaningful measures related to FIMI (foreign information manipulation and interference) – moreover, FIMI is used as an excuse to put pressure on independent media and civil society. The threat of foreign interference was used by the government as a pretense to introduce a repressive law that hurts both civil society and independent media. The Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty) is often compared to Russia’s “foreign agent” law, targets news media and civil society organisations that are considered under the influence of foreign interests (according to the wording of the law, mainly from the United States, an ally of the country) – it specifically mentions disinformation in its text (see the MPM 2024, Lakmusz, 2023, Venice Commission, 2023). The Sovereignty Protection Office, established under the Sovereignty Protection Act, targeted, among others, the independent newsroom *Atlatszo.hu* and Transparency International – in 2025, it accused the EU-funded cross-border investigative project The Eastern Frontier Initiative (TEFI) of interfering in Hungary’s domestic politics.
- In December 2024, the Hungarian Constitution Protection Office launched a national security probe into the independent *Magyar Hang*'s publication of a "fake news" article, which it saw as having the "potential to endanger Hungary’s security". Earlier that month, the outlet published an article that claimed that (following the fall of the Assad regime) a Syrian airplane was received at Budapest Airport. According to the article, no airport staff was allowed near the plane or its passengers, and it was alluded that President Bashar al-Assad might have been one of the passengers. Not much later, the outlet admitted that it made a mistake, and redacted the article (the news was unfounded and the picture used as illustration was taken a decade earlier, at a different airport). The Office for the Protection of the Constitution, questioned three employees of the outlet (Tamás Koncz, journalist, Csaba Lukács, director of the newspaper, and Zsombor György, editor-in-chief) to gain information about the way the research was conducted and conducted a lie detector test on them (*Magyar Hang*, 2024).

## PROTECTION OF RIGHT TO INFORMATION

**VERY 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. Data must be paid for by those requesting it, requests for data cannot be made anonymously, data can be kept secret indefinitely on the grounds that they are relevant for the preparation of governmental decision-making, and copies of documents of public interest protected by copyright cannot be

requested (see Helsinki, 2024a, HVG, 2024). The greatest problem, however, is that data controllers refuse most data requests, leading to years of litigation.

### Issues requiring particular scrutiny:

- Following some minor improvements, due to requests by the European Commission, in 2024, the legislator has again narrowed the scope of access to data of public interest under Act CXII of 2011 in several respects. The request for data may be refused in cases where it would require the collection of data not actually held by the public body, in particular data held by a public body under its control or supervision, or the production of new data by comparing data of public interest held by the public sector body with data of public interest already held by it. This exception is very easy to abuse, since the data requester is not in a position to verify whether there is a need to produce 'new data' or to obtain additional data.
- In addition, preparatory documents, contracts, financial, technical and business data relating to the government's foreign investments will only be made public with a specific ministerial authorisation. From 2024, government decisions that are "not public" are considered as preparatory documents for decision-making for 20 years instead of the previous 10 years, and will not be released as public data. Government decisions that do not contain classified information and are therefore not secret, but are not published in the Hungarian Official Bulletin, are not public.
- The general experience of data requesters is that public authorities are not cooperative at all. Ignoring or refusing data requests is as common as sending poor quality scanned, unreadable and unsearchable pdf files.
- In the past years, there were also a number of emblematic cases when authorities made it hard for journalists to get access to information through interviews or through accessing relevant people. In 2024, this included, among other things, the denial of accreditation of international news outlets at Orbán's State of the Nation speech and the CPAC conference, and the Presidential Office's refusal to answer journalists' inquiries (MAPMF, 2024c, d & e).
- Act XXV of 2023 transposed the Whistleblower Protection Directive, but it has been criticized for its erroneous implementation (K-Monitor & Transparency International, 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, 2024b). Awareness of whistleblowing and its guarantees is considered to be low.

**JOURNALISTIC PROFESSION,  
STANDARDS AND PROTECTION**

**MEDIUM - HIGH RISK**

Journalists' professional associations are unable to effectively guarantee respect for working conditions and journalists' safety. There are industry associations that are more successful in providing protections to the entities that they represent, such as the Association of Newspaper Publishers (MLE), but they have the interests of media companies in mind : they successfully proposed the lowering of the newspaper VAT to 0

(Feko, 2023). While the MLE is supposed to be an organization that looks out for economic interests of companies – and thus, very much apolitical – it still became a target of pro-government propaganda, when it spoke out against the Sovereignty Protection Act. Most representatives of media outlets we spoke to mentioned that they managed to increase salaries in line with inflation, but still, the salaries in the profession are considered to be low.

Physical attacks against journalists rarely happen, threats (outside of the online environment) are not common. In 2024, we know of two cases when journalists were assaulted or threatened: the director general of Anti-Terrorism Center physically harassed a *Telex* journalist, and according to a leaked recording, Mayor of Eger Ádám Mirkóczki insulted local journalists (MAPMF, 2024 f & g). No journalists were killed in Hungary. The country is free from arrests or imprisonments of journalists – but there are certain cases of harassment by authorities (such as the lie detector test of the journalists of *Magyar Hang*, described in the previous section). In the past years also a number of DDoS attacks were reported on independent newsrooms (MFRR, n.d.), and smear campaigns are common.

Journalistic sources are protected by law. The Media Act stipulates that a media content provider and any person employed by or otherwise connected to him or her in an employment or other legal relationship with a media content provider are entitled, as defined by law, to keep the identity of the source of information confidential in judicial and administrative proceedings and to refuse to hand over any document, document, object or data carrier that could identify the source of the information. Even in the context of criminal proceedings, the court may make exceptions to this only under strict conditions. In all cases, the disclosure of the source of the information must be decided by the court and not by the police or the prosecution. At the same time, the practice of surveillance increases the risk for potential sources and whistleblowers.

### **Issues requiring particular scrutiny:**

- While physical attacks against journalists are not common in Hungary, there is a lot of online bullying and harassment (often of a sexual nature), especially against female journalists (Tófalvy, 2017, see also Botás, 2021 and Rutai, 2021). Horváth (2024) conducted interviews with early-career journalists in four independent Hungarian newsrooms on issues undermining journalistic resilience. While initially, all journalists said that they did not encounter harassment, after better understanding the issue, all of them reported experiencing incidents that would fall into this category. All of them said that they had at least one case that they felt especially threatening. There are very few openly LGBT+ journalists in Hungary, due to the unfavourable environment.
- The practice of surveillance of journalists is a major concern. In 2024, the European Court of Human Rights (ECtHR) condemned Hungary for intercepting a journalist's phone calls for days in order to discover her sources within the police (in the case *Klaudia Csikós v. Hungary*, application no. 31091/16). The judges found that there is no check on the authorities and no way to search remedy in case of such intrusion. Such practice violates both Art. 8 and 10 of the European Convention on Human Rights. It is especially worrying that Hungarian laws provide numerous opportunities to surveil journalists, activists or civil society – without sufficient justification (see Szabó, 2021, *Ügyészség*, 2022). There are no public discussions on preventing illegal surveillance, and the Action brought on 10 July 2024 – *Hungary v European Parliament and Council of the European Union* (Case C-486/24) asked for the annulment of the EMFA's Art. 4.

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 Capture Monitoring Report highlights that "the decisions of the authority frequently reflect the intentions of the government" (IPI & MJRC, 2024).

The budget of the media authority has grown, 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. For the year 2024, the Parliament allocated HUF 57.8 billion (approximately EUR 130 million at the time) to the Hungarian media regulator, and 59.5 billion for the year 2025. (see the laws: 2023. évi LXXV. törvény a Nemzeti Média- és Hírközlési Hatóság 2024. évi egységes költségvetéséről. & 2024. évi LXIII. törvény a Nemzeti Média- és Hírközlési Hatóság 2025. évi egységes költségvetéséről).

### Issues requiring particular scrutiny:

- 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.
- HDMO, an EU-funded EDMO hub, organises workshops on current issues related to disinformation and the implementation of the Code of Conducts. The President of the NMHH has indicated by letter that the authority is not willing to participate in these workshops. In doing so, the digital services coordinator is explicitly obstructing the implementation of an EU project for which he is responsible.
- Some measures of the media regulator are considered politically motivated – such as the non-renewal of radio frequencies of independent radios for minor infringements, such as in the case of Klubrádió. According to Advocate General Rantos of the Court of Justice of the European Union, "Hungary infringed EU law by refusing to renew Klubrádió's contract for the use of the 92.9 MHz frequency and by excluding it from the call for tenders relating to that frequency" (Advocate General's Opinion in Case C-92/23 | Commission v Hungary).

## **Recommendations for Fundamental Protection**

### **To the government and authorities:**

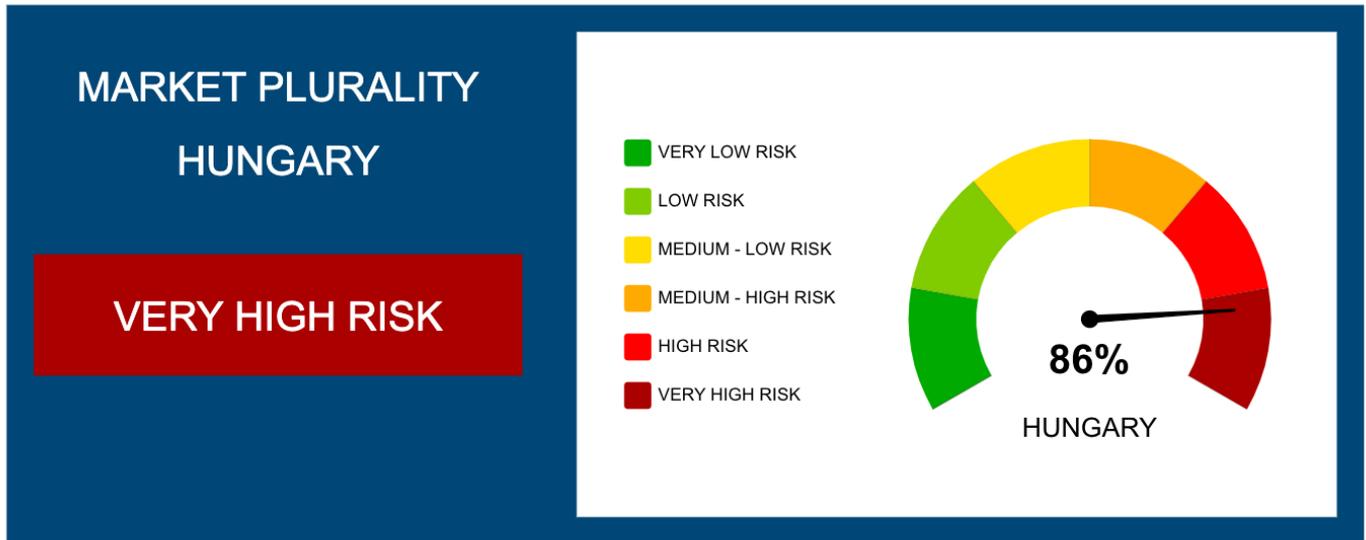
- Guarantee access to information and pass laws that put clear boundaries to the surveillance of journalists.
- Pass meaningful whistleblower and anti-SLAPP regulation, and put an end to the misuse of the GDPR.
- Refrain from spreading disinformation and from orchestrating smear campaigns against journalists.
- Scrap repressive laws, such as the Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty).
- Guarantee the independence of the media regulator, for example, through fair appointment rules.
- It is recommended that the Digital Service Coordinator develop a strategy for election campaigns to monitor and assess the impact of systemic risks related to the operation of platforms on election campaigns, involving the widest possible range of stakeholders.

### **To the journalistic community:**

- Strengthen journalistic associations, establish a functioning union and an effective press council.

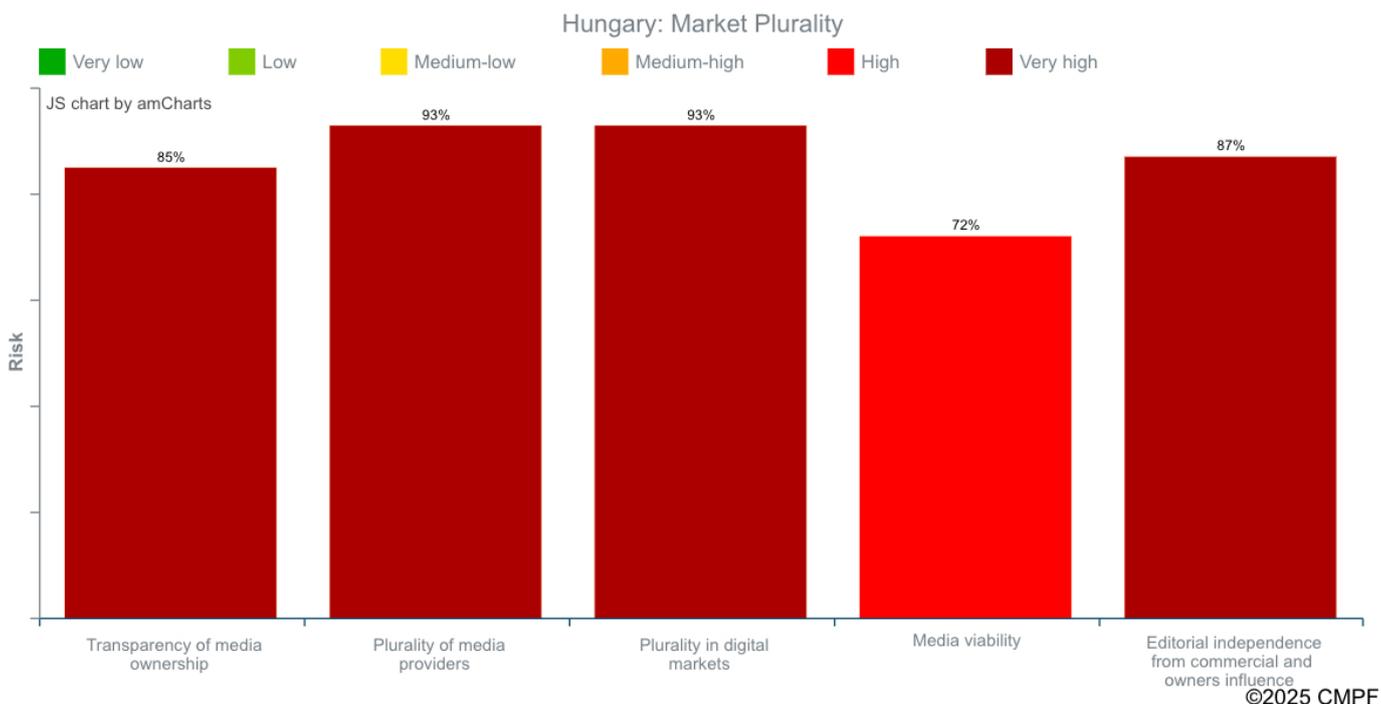
### 3.2. Market Plurality

The *Market Plurality* area considers the economic factors that impact the plurality of media offer, assessing the risks deriving from insufficient transparency and high concentration of media ownership, economic sustainability of the media, and the undue influence of commercial interests and ownership over editorial choices. Moreover, the area assesses the risks deriving from high concentration of digital markets and dependency of the media on online intermediaries.



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The **Market Plurality** area scores very high risk, as the media market is very concentrated, editorial autonomy is not respected and the sustainability of news media is threatened by the dominance of technology companies. There are barely any media-specific provisions that would focus on the transparency of ownership, but thanks to the regulation of other sectors and the work of investigative newsrooms, the public is informed of the owners and ultimate beneficiaries behind news media.



There are no detailed rules on transparency requiring the disclosure of ownership structure of media companies. Transparency is partly ensured by publicly accessible registers kept by the media regulator, however, these 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 (but overall, the rules on the disclosure of company information are in line with EU standards). Concerning financial reporting, there are no media-specific obligations, however, reporting of the general annual financial statements is obligatory, just like in other sectors.

### Issues requiring particular scrutiny

- 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 legal requirements to disclose the ultimate owners. At the same time, 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.

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

### Issues requiring particular scrutiny

- According to the Media Act, the Competition Council (which acts as a separated forum inside the 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. The Media Council's opinion is binding on the Office of Economic Competition. The Media Council has issued

reasoned opinions in only three out of six cases, of which only one has been cleared by the regulator. As we have explained in our previous writings, the most important feature of the technical content of the resolutions is their lack of reasoning and inconsistency. The legality of the two expert opinions issued by the authority in the form of a simplified decision without justification is rather questionable. The politicisation of the media market – and competition-related decisions – is best exemplified by the government's decision to block an investigation into competition and media law when 13 media companies handed over their media to the Central European Press and Media Foundation (KESMA) for free in a single day, creating a pro-government media conglomerate with nearly 500 media outlets. The 2013 amendment to the Competition Act, adopted under the Fidesz majority, allows the government to classify certain mergers as "of national strategic importance", thus exempting them from the obligation to be examined by the competition authority. On 5 December 2018, the government also made use of this possibility in the case of the media merger: it issued a decree declaring the merger of media companies close to Fidesz to be of "national strategic importance" and thus exempted it from any licensing procedure.

- 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, 2024a). The largest commercial audiovisual companies based on 2023 revenue data are TV2 Zrt (pro-government): HUF 56.7 billion (ca EUR 141.7 million), Magyar RTL Zrt (independent): HUF 55.4 billion (ca EUR 138.5 million), Viacom Int. Hungary (only entertainment content): HUF 18.1 billion (ca EUR 45.1 million), and HBO Holding (only entertainment content): HUF 6.1 billion (ca EUR 15.3 million). The PSM has 128.6 billion (ca EUR 321.5 million) in revenues. There were 430 television channels in 2023, incl. local channels. These channels were operated by 330 service providers and 195 were business enterprises (the others are typically municipalities, foundations or associations.) According to the report of the media authority (NMHH, 2024a), only 11 audiovisual service providers have revenues above HUF 1 billion (ca EUR 2.5 million). Based on the revenue data the concentration is very high, but the exact concentration ratio cannot be calculated. The audience share of the two biggest television companies (TV2 Group and RTL) is 40.6%, based on 2024 data. (Szalay, 2025) Public service media audience share is around 10-11% every year, so the estimated audience share of the top4 television companies is between 50% and 60%.
- Revenue-based market share of radios cannot be calculated because of the high number of small local players, but the audience reach of top4 radios (Retro Radio, Radio1, Kossuth Radio and Petofi Radio, all government-aligned) is outstandingly high among the top10's reach data (NMHH, 2024b). 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. Based on 2024 November data, the market is dominated by *Index* (government-controlled), *24.hu* (independent), *Blikk* (tabloid) and *Origo* (government-controlled) (NMHH, 2024c), 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 33 companies (and the public service media), the market share of the top4 service providers 81.6 percent: the public service media had HUF 128.6 billion revenue (ca EUR 321.5 million), the pro-government Mediaworks HUF 73.2 billion (ca EUR 183.0 million), the pro-government TV2 HUF 56.7 billion (ca EUR 141.7 million), and the independent RTL HUF 55,4 billion (ca EUR 138.5 million).

Big tech platforms still dominate the digital market. Concerning the audience data, these platforms outperform traditional media: Google has 3 million, Facebook 1.45 million daily unique users, while the most popular Hungarian websites are around 600-700 thousand (NMHH, 2024c). There are no specific concentration regulations focusing on online platforms. Similarly to the previous years, in 2024 the advertising market was dominated by digital players: 54% of overall advertising revenues went to the digital segment. Within the online segment, the global digital platforms gained almost 2/3 of the advertising revenues (MRSZ, 2025).

### Issues requiring particular scrutiny

- There are no initiatives addressing concentration of online platforms.
- Financial agreements between digital intermediaries and media providers is limited to Alphabet/Google and there are only bilateral agreements. As described in detail in last year's MPM, Repropress, the Association for the Reprographic Rights of Publishers worked on establishing a framework, but in 2024, the Ministry of Justice didn't make a favourable decision for collective bargaining. 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). There are no financial agreements between Generative AI providers and media providers. There is no special tax for platform providers.

Media companies operate in a highly uncertain market environment and this leads to significant vulnerability. The MRSZ (Hungarian Advertising Association) provides figures of the latest advertising trends. According to these, revenues seem to have increased in nominal terms by 7.6% compared to 2023. Excluding the digital platforms this growth rate is 5.4%. The inflation rate was only 3.7%, so there was a moderate growth in the advertising revenues in real terms (this might mean that the risk score of this indicator is slightly overestimated, given that revenue data were not available at the time of the data collection). The situation is still worrying in the print media sector, where the advertising revenues decreased in nominal terms by 8.3% (MRSZ, 2025). If we include audience revenues in our assessment of the traditional media sectors (publishing, radio and television), based on 2021-2023 corporate revenue data comparison, the top companies in these sectors show nominal growth, but a decline in real terms.

Independent digital news organizations are innovative and they experimented with several new business models, mainly based on different forms of audience revenues. They introduced different crowdfunding and paywall systems, but they also generate extra revenues from other activities (book publishing, merchandising, organization of exclusive events). Community building proved to be successful in several

cases, live events for subscribers or supporters are rather widespread. The news organizations also introduced innovative formats (video, podcast, data journalism, long-form journalism, e-book and bookazine, fact-checking service), but these services are rather costly and the launch of a new format is often financed by international grants. International collaborations are also typical, but they also depend on the grants. Media outlets are more and more successful in the collection of the 1% income tax scheme. This is a special Hungarian tax rule, according to which citizens can donate 1% of their income tax to a civil society organisation of their choice. If a media organisation is registered as a civil society organisation or a for-profit media company has a foundation, it is entitled to collect 1% of the income tax. In 2024, the *Partizan* public affairs YouTube channel collected the highest amount from this source (HUF 416 million, more than EUR 1 million). Some marginal online media rely on artificial intelligence in the production of its journalistic content, but their products are of questionable quality (Német, 2025b).

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 that the number of members is stable, “slightly above 2500” - but membership in MÚOSZ doesn't necessarily mean that the persons are employed (MÚOSZ, 2024). There was no news about major closures or downsizings (the case of the marginal *Frisshirek.hu* was reported, *RTL* downsized its online edition and *Jelen* political weekly closed its print edition).

### Issues requiring particular scrutiny

- The viability of the local media market is especially uncertain. Majority of local newspapers are published by municipalities and financed by public sources. This is also the case with many local television stations. There are only a few (around a dozen) local independent newsrooms in the country; they all provide online services. They are typically very small and continuously apply for grants from international donors. Crowdfunding and advertising revenues have only a complementary role.
- 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 2024 was HUF 1.44 billion (ca EUR 3.5 million) (see Act LXXV. of 2023). There is no assessment of the impact, transparency or fairness of this support scheme. Pro-government media are heavily financed by state advertising (Mérték, 2024a).
- Many independent news media used foreign grants to complement its market and user revenues – the reliability of this source of revenues has become uncertain, as U.S. state-connected funds became unavailable after Donald Trump's inauguration, while recipients of foreign grants in Hungary are targeted by smear campaigns and investigated by the Sovereignty Protection Office (Daily News Hungary, 2024, Venice Commission, 2024) – the reports of this office frame even EU grants as possible risks to the country's sovereignty (see, for example, the Sovereignty Protection Office's 2024 report "THE EUROPEAN COMMISSION'S CERV PROGRAMME – This is how Brussels turned on the money tap to fund the Soros network").
- There is a need for better (disaggregated) data on media revenues as well as on employment trends.

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 Press Freedom Act (Act CIV of 2010) highlights that owners cannot force journalists to perform tasks they find unethical. However, in practice, this rule has no practical significance, and no journalist has ever taken legal action on this ground.

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). Art. 20 of the Press Freedom Act requires that advertisement should be distinguishable from editorial content. Still, there are cases of disguised advertising.

### Issues requiring particular scrutiny

- Commercial influence often overlaps with political influence, as government advertising is a significant source of revenue. Moreover, the government can exert pressure on market players, 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, 2023, Bleyer-Simon, 2022, Martin, 2022 & Odehnal, 2023).
- Some major media have relevant interests, links or activities in non-media businesses. 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 Lőrinc Mészáros, the country's wealthiest person (childhood friend and supposed middleman of Viktor Orbán). 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. *24.hu*, the largest independent online news media in the country, is owned by Zoltán Varga, another one of the richest people in the country (regularly features on Forbes' top 50 list) – he invests, among other things, in the aviation industry. In late 2024, the Mathias Corvinus Collegium (MCC), a think tank and “talent management” institution became the 75% owner of the *InfoRadio* talk radio as well as the owner of the magazine *Mandíner* – the MCC is not just the operator of an international network of talent management and research institutions, but also the owner of the largest players on the Hungarian book selling and publishing market.
- For the largest media, there are no practices of disclosure of any actual or potential conflict of interests of media owners.

## **Recommendations for Market Plurality**

### **To the government and authorities:**

- Improve ownership transparency, as well as data provision on media revenues and market trends. This should include publicly accessible registers on media owners, as well as ultimate beneficial owners, for traditional and digital media, as well as revenue data for all sectors.
- Enable effective action against market concentrations, including the dominance of KESMA. Do not consider certain undertakings in the sphere of the media to be of national interest and as such exempted from the regulation (as is currently the case with the company)
- Provide fairly and transparently allocated subsidies to the private media.
- Constructively participate in the process of regulating online platforms and mandating digital players to support journalism.

### **To the journalistic community:**

- Improve adherence to journalistic rules and standards, sign up to self-regulatory tools, start a conversation on additional duties and protections of journalists.

### **To media owners:**

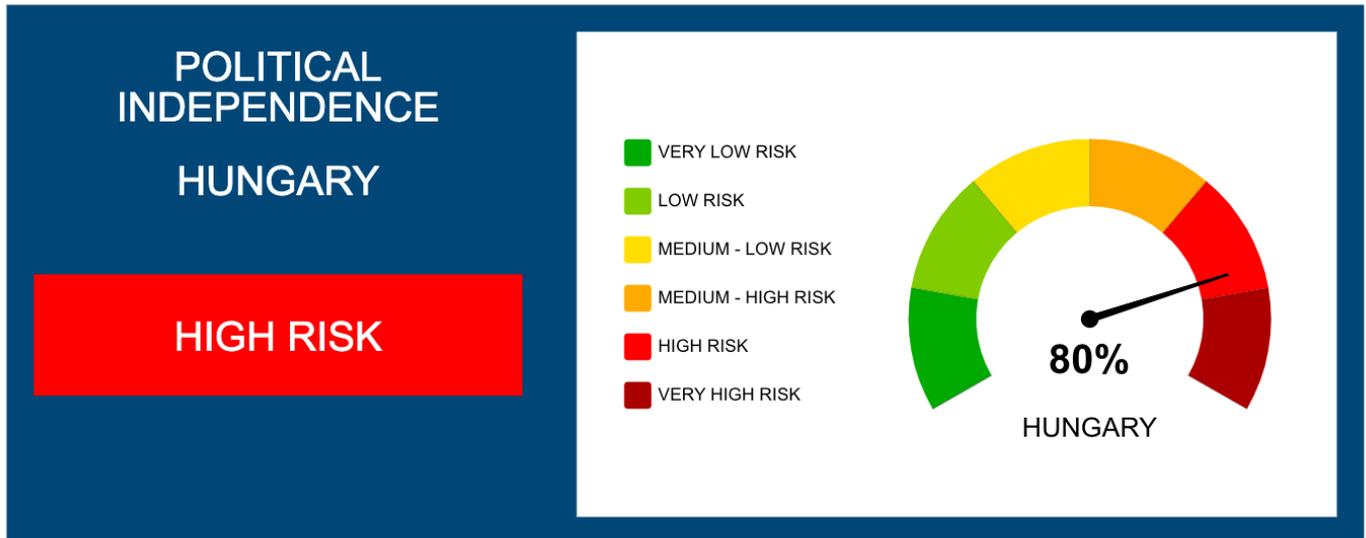
- Respect the independence of journalists and increase their involvement in the decision process of newsrooms.

### **To the European Commission:**

- Issuing and implementing detailed guidelines to evaluate the impact of media market concentrations on media pluralism and editorial independence, to contrast misuse of 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) which 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”. Guaranteeing effectiveness of the European Board of Media Services' intervention and opinions.

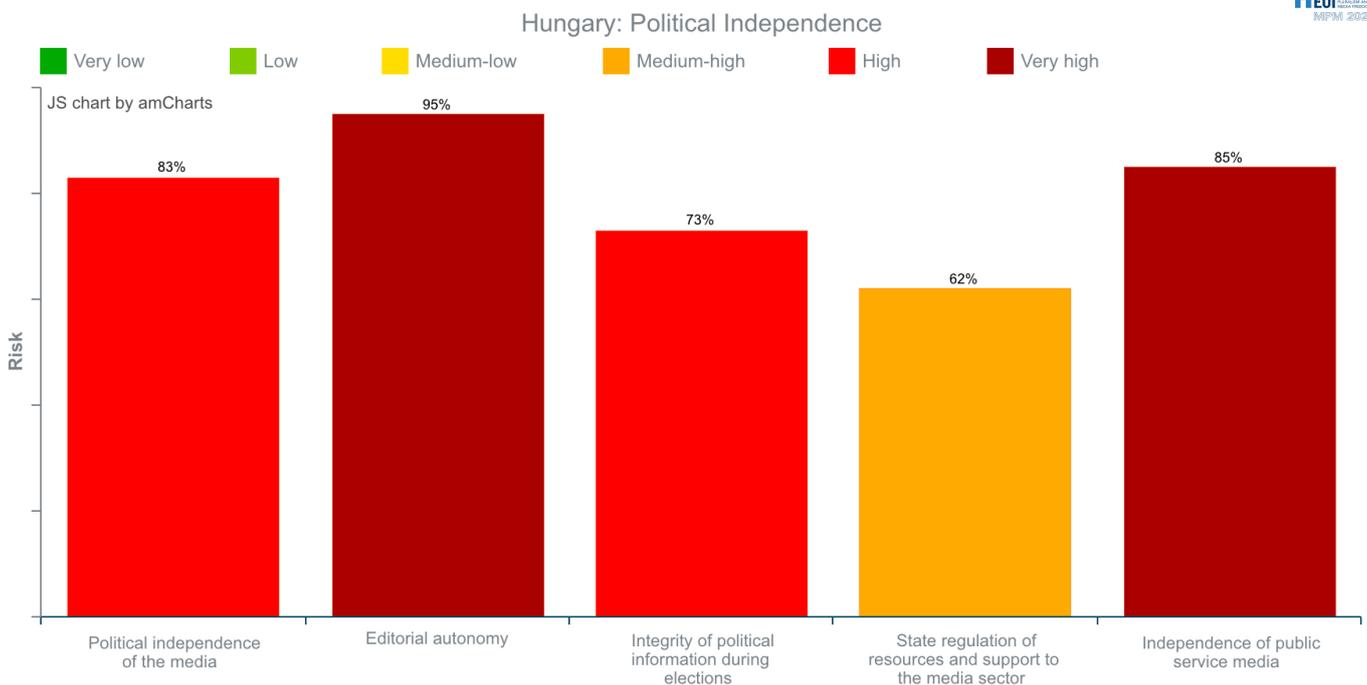
### 3.3. Political Independence

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 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.



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One of the greatest vulnerabilities of the Hungarian media landscape is **Political Independence**. A large segment of the political landscape is controlled by the governing party. The use of political advertising as a hidden subsidy to allied news media is especially worrying – along with the weaponisation of the public service media.

Political influence is a major problem in Hungarian media. 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 MPs from being media owners. There have been examples of MPs or politicians being direct media owners on the opposition side in recent years, such as the now defunct *Azonnali.hu*, being owned by Péter Ungár (head of the LMP party) and *frisshirek.hu* by the porn-entrepreneur, billionaire and party founder György Gattyán. Since late 2024, two media outlets, *InfoRadio* and *Mandíner*, are partly owned by the Mathias Corvinus Collegium (a pro-government think tank) where MP Balázs Orbán is a member of the Board of Trustees.

However, the main problem under this indicator is not political ownership. 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). Former journalists of Index came out and admitted that the outlet receives direct instructions from the Prime Minister's Office (Mapping Media Freedom, 2024). Media1 revealed that regular meetings took place between the leadership of the independent RTL television channel and Antal Rogán, Head of Cabinet of the Prime Minister (Szalay, 2024b). 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).

There are also cases of political pressure on news publishers. The Human Rights Watch report “I Can't Do My Job as a Journalist” (HRW, 2024) mentions that “Zoltán Varga, the owner of Hungary's largest independent media company, Central Media Group, which includes news site 24.hu, told Human Rights Watch that he frequently receives phone calls from people working in ministries telling him not to run certain stories.” The report adds that “businessmen close to the government tried to get [Varga] to sell his media portfolio [...]”.

### Issues requiring particular scrutiny

- In relation to the lack of independence at KESMA-owned media, the Country Memorandum of the Commissioner of Human Rights (of the Council of Europe, 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). Mérték (2024b) found in assessments of news coverage in 2023 and 2024 that there are obvious signs

of bias in the narratives of TV2. 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). The daily *Nepszava* analysed the coverage of the newly emerged opposition politician Péter Magyar in MTI and found that he is underrepresented in news agency materials and most of his coverage is biased (Árpási, 2024). There have also been reports about statements by opposition parties being withheld by MTI (Feko, 2024), as well as about MTI's reluctance to report about certain issues that are uncomfortable for politicians of the governing party (Szalay, 2024c).

## EDITORIAL AUTONOMY

VERY HIGH RISK

There are no cross-sectorial codes of conduct that can effectively stipulate editorial independence from political interference in the news media. MÚOSZ (the Hungarian Association of Journalists) oversees its own code of ethics, but it has very limited impact. Its ethics commission published only 4 decisions last year related to published articles. The self-regulatory organisation Mediaforum was founded in 2024, as a successor of the Forum of Editors-in-Chief, as a defence mechanism against the government's so-called Sovereignty Protection Act (which targets newsrooms in the same fashion as Russia's "foreign agent" laws). The Mediaforum coordinated joint statements by newsrooms against the law. Mediaforum is still very new, and its impact can only be assessed in the next few years. The ethical code is accepted as mandatory by the newsrooms that are the members of the Forum. In addition, there are some newsrooms that have their own codes (such as 444, Direkt36, Atlatzso and Telex) or that sign up to international codes and guidelines. The fact-checking organisation Lakmusz, for example, signed up to the guidelines of the IFCN and EFCSN, and clearly communicates it on its website, including a summary of its values and rules of functioning. In addition, in most newsrooms, there are also no safeguards seeking to ensure that decisions regarding appointments and dismissals of editors-in-chief are not influenced by interests or internal mechanisms that would help uphold independence of journalistic work. In 2024, it was revealed that the website *Nyugati Fény* disguised the name of its editor-in-chief on the website's masthead – referring to him by the pseudonym Győző Balogh. This is a serious concern for transparency and accountability.

### Issues requiring particular scrutiny

- The main self-regulatory instruments are not effective in preventing political influence in practice.
- There is no Press Council in Hungary, but there would be a need to establish one.

## INTEGRITY OF POLITICAL INFORMATION DURING ELECTIONS

HIGH RISK

News media, including the PSM, are not required to provide airtime to political parties. The Public Service

Media Codex (p. 16) mentions that competing parties should have equal chances in the PSM – but this is not the case, in practice (see also OSCE, 2022). The Mérték Media Monitor (2024b) assessed the narratives of M1/Duna TV and Kossuth Rádió in specific time periods in 2023 and ahead of the elections in May 2024. They found that the coverage was biased towards the government, albeit to a somewhat lesser degree than the private pro-government media (such as TV2 and KESMA's outlets). The media regulator also conducted an assessment of the media presence of political parties, actors and politicians in television. According to this research, in May 2024 (the month leading up to the municipal and EU elections), M1's news segment gave 78% percent of the speaking time to the government or members of the governing party. In the case of the news at Duna TV, it was 73.6 percent. The opposition party LMP received more coverage than other opposition parties (5.5 & 7.7) (NMHH 2024g) – likely because their candidate running for mayor, Dávid Vitezy, was unofficially supported by the governing party, during the Budapest election (challenging the incumbent, who was supported by the main opposition parties).

According to Act CLXXXV of 2010 on Media Services and on the Mass Media (Article 3) "During electoral campaign periods political advertisements may only be published in media services in accordance with the provisions of the Act on Election Procedures. Outside electoral campaign periods, political advertisements may only be published in connection with referendums already ordered." For broadcast media, advertising space has to be provided for free (according to the constitution), but print and online media are allowed to ask for remuneration. In most cases, the rules are respected. A problematic case was related to the PSM that broadcast political ads disguised as news segments. There is no information about third country sponsors in political advertising.

### **Issues requiring particular scrutiny**

- The National Election Commission found in the campaign period of European Parliament and local elections that M1 public service television channel violated the rules on election integrity when it broadcast the campaign film of the ruling party in the news program. The Media Council started investigating the case after the election (Kolozsi, 2024).
- Research of Political Capital, Mertek and Lakmusz (2024) found that in the first five months of 2024 pro-government media spent €2.5 million to advertise their content on social media, although not exclusively on political issues. Nevertheless, government-organised media were often involved in spreading the messages of the ruling party.
- The monitoring of the use of personal data for political purposes shows bias. The data protection authority rarely acts on the misuse of data for political purposes, especially if the governing party is concerned. In 2024, an emblematic case of data misuse was reported: the database of email addresses used for registration for COVID-19 vaccines in 2021 was used to send out pro-government campaign messages prior to the EU elections (TASZ, 2024b).
- The election campaign regulations do not explicitly address social media. The National Audit Office, which monitors campaign spending, published a manual on accounting for campaign expenditure online, but it is not followed. In 2024, the government-aligned Mediaworks publisher circumvented election rules by promoting the governing party's candidates with social media ads (MAPMF, 2024h).

The rules on spectrum management are essentially set by European norms (see Act C of 2003 on Electronic Communications Article 11 (1), and 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; Mérték, 2024a).

Unfair support to the media is an issue in Hungary – but mainly through state advertising. The Media Act does not mention direct subsidies. There is a support programme for local TVs and radios, which can be used for news production. The budget for 2024 was HUF 1,44 billion (ca EUR 3.5 million). (see Act LXXV. of 2023). 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 main indirect subsidy is the reduced VAT which is available to all print news media outlets. In 2024, a new VAT rule was introduced for dailies – decreasing their value added tax to 0 percent. This disproportionately benefits pro-government media, as *Magyar Nemzet*, *Bors*, and the local dailies are owned by KESMA / Mediaworks. At the same time, there were no complaints by representatives of independent media outlets about this scheme. The government-critical *Népszava* also benefits from this indirect support, and the remaining print media are not worse off than before. Since the COVID-19 pandemic television and radio stations are exempted from the program fee (Domány, 2025). The unfair distribution of state advertising, including advertising from state-owned companies still prevails (Urban, 2024).

### Issues requiring particular scrutiny

- The non-transparent and unregulated distribution of state advertising is a form of hidden state support. 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. Based on 2023 data, it is still the case that the state advertises almost exclusively in pro-government media outlets and that the majority of advertising revenues for several media products, typically pro-government, are generated by state advertising (Mérték, 2024a). In April 2025, the publishers of the independent weekly *Magyar Hang* and another publication submitted a state aid complaint to the European Commission (Magyar Hang, 2025). The complaint was accompanied by an extensive data analysis by the former Chief Economist of DG COMP, Kai-Uwe Kühn (Kühn, 2025).
- The governmental spending on social media is not transparent (either). Analysis based on the platforms' database prove the outstandingly high political advertising activity in Hungary. The 2024 EP and local election campaign has revealed a huge asymmetry in political ad spending by political camps in Hungary. While the pro-government camp spent €5.4 million on Meta and Google ads from the beginning of the year until 15 June, all 15 opposition parties and their associated organisations spent a quarter of that, €1.4 million (Political Capital et al, 2024).

Public service media is subject to the general obligation of balanced information: Article 13 of the Press Freedom Act highlights that linear media services providing information are obliged to provide balanced information on events and controversial issues of public interest at local, national, and European level. The Media Act (Art. 83) specifically defines the purpose of the public service media service: to provide balanced, accurate, thorough, objective and responsible news and information. In the case of a violation of balanced information, a special procedure is to be carried out under the same act (Art. 181). However, in practice, 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 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. As described earlier in this report, the Media Council members were delegated by the ruling party. In the case of appointment or dismissal of editors and editors-in-chief the reasoning is not public, the process is not transparent.

In 2016, a complaint that Mérték Media Monitor filed jointly with Klubrádió and former MEP Benedek Jávor, argued that the funding of Hungarian public service media runs afoul of European rules on state aid. As a result of this complaint, as of 2021, the State Audit Office of Hungary (SAO) has begun auditing the use of state aid granted to the MTVA for the performance of its public service functions. The European Commission had argued that the involvement of the SAO in the financing of public media subsidies was a sufficient guarantee of the lawful use of state aid, but in reality, the SAO was not even willing to publish the report. After a resultless data request based on FOIA, Mérték took the SAO to court to publish the document. In the course of the proceedings, the SAO and MTVA published the SAO's report for 2021; however, the report did not mention any evidence to support the findings. The SAO found that on the whole, the MTVA's management was in order. In March 2024, the European Commission sent its final response, rejecting the complaint (Mérték, 2024a).

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 2024, the proposed budget was HUF 142 billion (ca EUR 355 million), which is 12 percent higher than in the previous year. In 2025, the budget is expected to increase to HUF 165.6 billion (ca EUR 414 million) (see Act LXXV of 2023 and Act LXIII of 2024).

#### Issues requiring particular scrutiny:

- The PSM is unable to fulfil its public service mission, despite receiving public funds to do its work. Instead of a PSM, it can rather be considered a pro-government propaganda channel.
- The presentation of Russia's aggression against Ukraine in the public service media is largely a

rehashing of the Russian narrative (Urbán et al. 2023, Némethy, 2025a), often using RT, a sanctioned Russian propaganda channel as its source.

## **Recommendations for Political Independence**

### **To the government:**

- 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 proportion 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 media outlet 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.
- Respect the editorial independence of newsrooms, including the PSM, and refrain from interfering with content production.
- Introduce 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 for 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.
- Campaign financing in European Parliament and local elections is essentially unregulated, creating a serious imbalance between competing candidate organisations. It is recommended that legislators set a ceiling and introduce transparency requirements for campaign spending in these elections.
- It should be required that the actual sponsors of political advertising are identified and publicly available, regardless of the advertising platform.

### **To the European Commission:**

- Reassess 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.

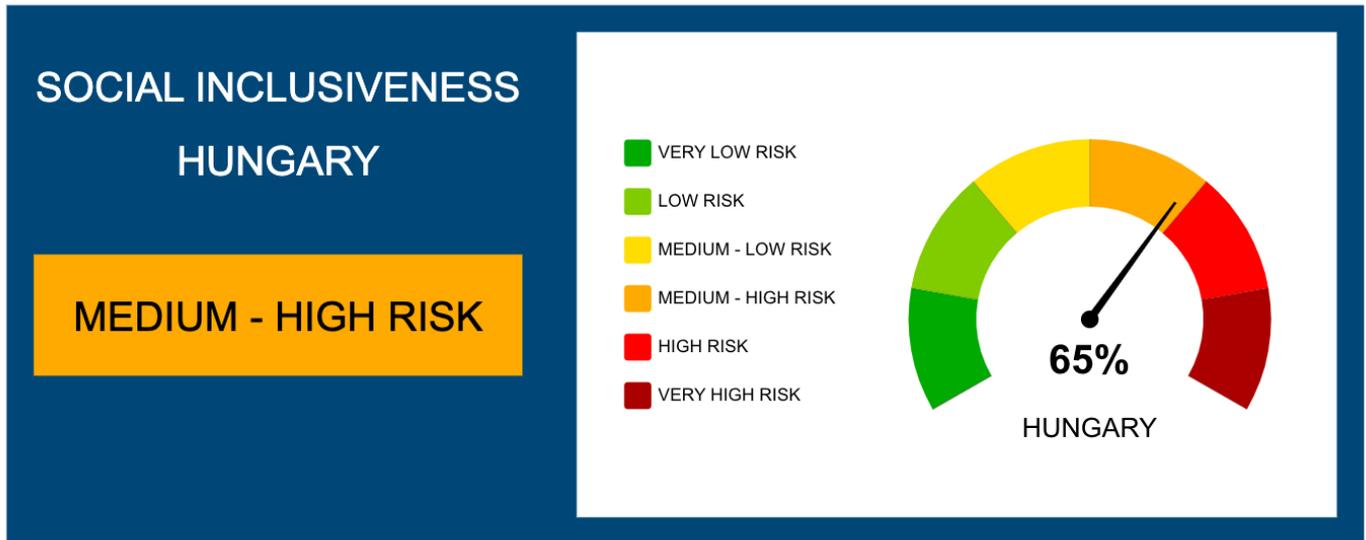
- Consistently apply state aid law, both in relation to the financing of public service media and the allocation of state advertising.

**To the journalistic community:**

- Withstand political pressures, support the creation of strong self-regulatory systems (including the establishment of a Press Council) and actively advocate for the independence of journalism.

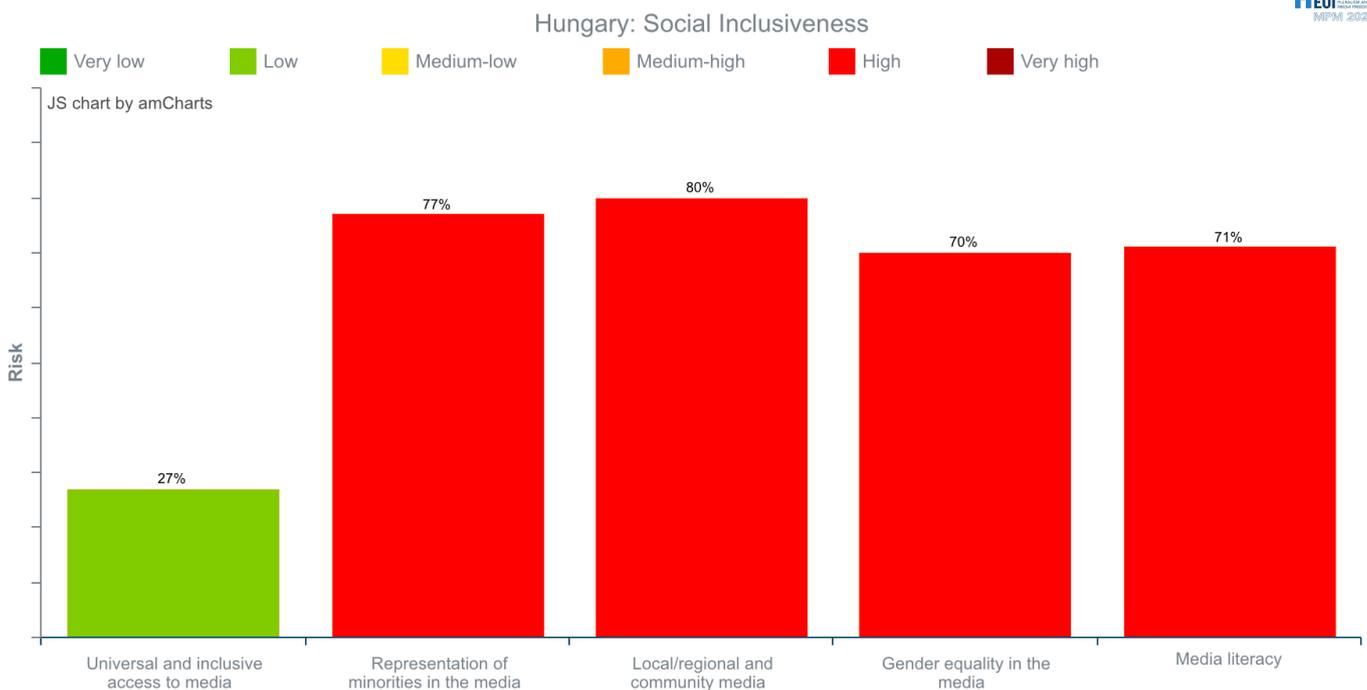
### 3.4. Social Inclusiveness

The Social Inclusiveness area focuses on the universal, inclusive and safe access to media, especially by specific groups in society: minorities, marginalised communities, local and regional communities, women and people with disabilities. It also examines media literacy environment, as a precondition to inclusiveness.



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Hungary shows several deficiencies related to **Social Inclusiveness**. The representation of minorities and vulnerable groups is stereotypical, and these groups are not sufficiently involved in the process of news production. The levels of media literacy are also low, and there is not sufficient activity to improve the situation.

The must-carry rules ensure a secure and prominent place for public service television channels on all platforms, including DVB-T. Not only does the law require that four television channels (and three radio stations) must be carried on all platforms, but also that they must be placed in the first positions in the programme schedules. In terrestrial radio, the digital switchover has not taken place and is not expected to take place, with the best quality frequencies being used by the public service radio channels. 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: *Kossuth Radio* has 96 percent, *Petofi Radio* 90 percent, national minority 93 percent coverage (NMHH coverage maps). In general, there is wide coverage and PSM content can be streamed live on *mediaklikk.hu*.

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95% of households have access to the internet (Eurostat, 2024), 89% of the population has broadband mobile subscriptions (Digital Decade, 2024). The Media Regulator's 2024 assessment of the state of the open internet found no violations (NMHH, 2024). ISPs manage network traffic in a way that is transparent, impartial and neutral, without discriminating against particular types of content or content from particular source.

When it comes to media access for people with disabilities, the situation is the same as in past years: legislation is in place and effectively implemented – but significant problems still exist, as the minimum requirements of the law do not provide sufficient access to the relevant services. Article 39 of the Media Act specifies that audiovisual media service providers need to provide programmes accessible for the hearing impaired, with subtitles or in sign language.

#### Issues requiring particular scrutiny:

- 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 – currently 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 the Media Act also 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).

## REPRESENTATION OF MINORITIES IN THE MEDIA

**HIGH RISK**

Act CLXXXV of 2010 on Media Services and on the Mass Media, section 99 states that “All nationalities recognized by Hungary are entitled to foster their culture and native language, and to be regularly informed in their mother tongue by way of specific programs disseminated by the public service media.” The media regulator NMHH (2024e) publishes a yearly assessment of the representation of different groups in PSM and private news. It is very hard to make sense of the data. Out of the relevant legally recognised minorities, only the Romani community saw a significant number of mentions. According to the count, Romani people were represented 947 times in news and current affairs programmes, approximately 90 of these mentions were in PSM news. Other minority groups are very small, and as such, their share in coverage is also limited in the news (but they all have their own dedicated shows).

There are laws or policies that aim at countering online hate speech, but the regulatory framework has significant deficiencies. In certain cases, the framework can even be misused against minority groups. LGBTQI people are insufficiently covered. There is additional concern about a new law that criminalises hateful online comments (see under highlighted issues below). According to Freedom House's 2024 Freedom on the Net report “[h]ate speech—including against LGBT people, Roma, and migrants and refugees—is commonplace online” in Hungary. There are some mechanisms to report online hate speech, but their effectiveness is limited. The INACH (2024) monitoring report found that the majority of reported hate speech content was not removed in the EU countries assessed – but there is no disaggregated data for Hungary. Farkas & Farkas (2024) found through focus groups that the governmental narratives related to the different groups of refugees/migrants had an impact on the ways society relates to them. Especially in the case of Middle Eastern/African refugees/immigrants, the mainstream narrative is hostile, in the case of Ukrainian immigrants the narratives are somewhat more favourable.

### **Issues requiring particular scrutiny:**

- There are foreign language news programmes (German, English, Russian, Chinese), but they are not aimed at minorities. Rather, they can be considered public diplomacy efforts to serve foreign audiences. There could be demand for minority-language news programmes, given the existence of different minority groups in the country – including news in Romani language(s).
- Minority coverage is often stereotypical. According to the NMHH's media market report (NMHH, 2024e), minorities (recognised by Act CLXXIX of 2011 on the rights of national minorities) are underrepresented in news programs, most minority coverage is related to the Romani community (the

other national minorities receive less than 10% in general, and only 1.8% on commercial media). In the case of the Romani community, most coverage (more than 40 percent) focuses on crime – there has been a sharp increase in 2021 (from approx 20 percent to more than 40) which the media regulator explains with a change in formats (increased focus on interviewing local residents, people walking around on the streets). In the case of other minorities, most coverage is focusing on their cultural celebrations. Stereotypical coverage of the Romani community is common in both news and entertainment programs (Fülöp, 2023, Bleyer-Simon et al. 2024a&b).

- The study of the media regulator (NMHH, 2024e) shows that there is some coverage of "economic migrants" and "political migrants" in PSM news, however, it is well documented that these groups are usually covered in a stereotypical or hostile way. There is no research on the coverage of the LGBTQ community, but given that any positive coverage of LGBTQ issues is considered LGBTQ propaganda, according to the law in Hungary (see Act LXXIX of 2021 Amending Certain Acts for the Protection of Children), it is safe to say that in general (based on the example of migrants/refugees and LGBTQ people) the coverage of marginalised minorities is problematic in the Hungarian media. In 2024, pro-government media aired numerous reports supporting gay conversion therapies (Fülöp, 2024).
- The bill "on curbing online aggression" was passed by Parliament in December 2024. Under this new law, anyone who publicly expresses an intention or desire "to commit a punishable act that causes violent death or is committed with particular cruelty against an identifiable person or persons" can be punished with up to one year in prison (as can be seen, the bill doesn't focus on statements related to a community, but related to identifiable persons). In an article published on Telex.hu, Szabolcs Hegyi, a legal expert working for the Hungarian Civil Liberties Union (HCLU / TASZ) criticised the bill, among other things, (1) for its vague wording, which might leave room for misuse, (2) for not differentiating between public figures and regular citizens, and (3) for the lack of a prior impact assessment by the legislator, as the application of the law could impose a significant burden on the authorities (See: Dévai, 2024).

## LOCAL/REGIONAL AND COMMUNITY MEDIA

**HIGH RISK**

Localities are inadequately covered by local media – most of the available content is either financed by local municipalities or produced by the captured media of Central European Press and Media Foundation (KESMA). Only a handful independent outlets (digital natives) exist locally – their financing is extremely vulnerable. Some Budapest-based outlets invest in reporting about local developments, but that cannot make up for the missing coverage. Circulation data from local newspapers shows that many of these outlets lost more than 10 percent of their revenues from 2022 to 2023 (NMHH, 2024f).

The Media Council has facilitated the expansion of the politically preferred players in this market. This has led to a situation where the majority of local radio stations are not in fact local media services but part of a radio network. The largest radio networks are Karc FM (political talk radio, KESMA – renamed, now operates as Hír FM), Rádió 1 (music radio, pro-government owner), Gong FM (music radio, KESMA), Best FM (music radio, pro-government owner), and religious radio stations run by the Catholic and Reformed Churches.

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 (Médiatanács Támogatási Program, 2024). 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.

#### Issues requiring particular scrutiny:

- Mérték Media Monitor (2023b) conducted a content analysis of three print county daily newspapers (Hajdú-Bihari Napló, Kisalföld, Új Dunántúli Napló) belonging to the portfolio of the KESMA. The most striking feature of the analysis was that the three dailies contain almost exactly the same articles, even some typos were the same. Just over 1 percent of the articles analysed had an identifiable author, and the vast majority of articles either had no identifiable source or simply listed the names of various social media sites. Many of the topics that can be unpleasant for the government were left unreported in these outlets. Former journalists of the local outlets *Promenad24* and *Rádió7* reported about constant political pressure on their work (Magyar Narancs, 2025).

## GENDER EQUALITY IN THE MEDIA

**HIGH RISK**

There is no comprehensive gender equality policy in the PSM or any other major media; self-regulatory codes in Hungary do not mention gender equality either. At the end of the year 2024, 29% of the members of the PSM management boards and 50% of PSM executives were women. The ratio was similar in private media: 29% 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. In the assessed local media, 30% of editors-in-chief were female. 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 national regulator's report on social diversity in the media shows that women account for 23.3 percent of the people shown on television news programmes (in the case of PSM only 19.1), which is a serious underrepresentation (NMHH, 2024d). 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).

#### **Issues requiring particular scrutiny:**

- While there are signs that women are seriously underrepresented in the media (Végh, 2024) – both when it comes to production and portrayal – there is still a lack of relevant information. There is, for example, no research on the proportion of experts quoted, women as information sources, or women participating in political programmes. Neither do we know the share of female journalists among employed journalists.

## **MEDIA LITERACY**

## **HIGH RISK**

As in previous years, we need to emphasise that, although there are media literacy measures in the country (see Youth Wiki, 2024), 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).

#### **Issues requiring particular scrutiny:**

- Media literacy is part of the National Curriculum of 2020, the country's educational policy. But it only includes a class on media literacy for the 12th grade. This means that media literacy can only be taught in higher level high schools.
- 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). Detekto added critical thinking courses to its program in 2024 – these include methodologies to deal with generative AI and to search for information online (Idea, 2024). Telex Academy by the Idea Foundation and the independent newsroom Telex was launched in 2023 (Telex, 2023).
- There are only very few media literacy programs focusing on marginalised or vulnerable groups.
- There is very limited media literacy activity by audiovisual media service providers.

## **Recommendations for Social Inclusiveness**

### **To the authorities:**

- Introduce programs that foster the integration of marginalised and minority groups into the journalistic workflow and improves their representation.
- Promote the introduction of gender equality policies in the media.
- Subsidies need to be made available to a wider range of local media – including independent online outlets.
- Media regulation needs a proper definition of community media, in line with the definition used by EU institutions and the Council of Europe.
- Hate speech must be consistently tackled by the police, prosecutors, and the courts, even when the source is government communication.

### **To the journalistic community:**

- The journalistic community needs to introduce gender equality policies and the support of vulnerable groups should be better covered by journalistic self-regulation.
- Newsrooms need to pay more attention to increasing the share of women and minorities in the journalistic work force.
- News media need to increase their coverage of local issues and cooperate with local media.

### **To media service providers:**

- Improve the quality of services provided to people with disabilities – including the provision of subscriptions and voiceovers to a larger range of programs (also re-runs and online editions), the quality of subtitles and voiceovers, and the provision of signing services instead of subtitles for children's programs.

## 4. EMFA Observatory - Year 1 : Before the implementation

*This section assesses the state of play of the EMFA standards in EU member states before its entry into full force, and in candidate countries before their accession to membership, based on specific themes monitored by the MPM questionnaire. The full list of EMFA variables can be assessed on the CMPF website.*

### FUNDAMENTAL PROTECTION

#### Platforms' moderation of media content

The risks related to the effects of content moderation practices by very large online platforms and search engines on freedom of expression are moderate. News media don't enjoy special privileges yet on online intermediaries. There is anecdotal evidence from newsrooms about arbitrary content removals and blockings of accounts – news media publishers are believed to be impacted –, but there is not enough information to assess the extent. Online platforms have the same policies in Hungary as in other EU member states. According to the DSA transparency reports, the number of content moderators on TikTok, Facebook and Google services is in line with other languages (proportionate to country size), but this doesn't necessarily mean that the number is sufficient. Hungarian users have access to the Appeals Centre Europe, as well as the Hungarian out-of-court dispute resolution body, the so-called Online Platform Vitarendező Tanács. Hungary is one of the few EU countries where such a body exists. However, the Hungarian body is not an independent body, as required by the DSA, but an institution directly operated by the media authority NMHH. There are few content removal requests on social media, initiated by Hungarian authorities. In the case of Google, there were 4 government requests reported for the year 2024 – covering the first 6 months – these concern defamation and privacy/security (see relevant chapter in the country report). In previous years, e.g. 2023, we can also see removal requests related to “government criticism”. There are no serious measures to address disinformation or foreign information manipulation and interference. The government itself is a source of disinformation, the PSM and privately owned pro-government media (re)publish fabricated stories and foreign propaganda (Urbán et al., 2023, Német, 2023, Zöldi, 2022) – which will make it hard to determine what media can be provided special treatment under Art. 18 EMFA. Some anti-disinformation measures have a chilling effect on the freedom of expression.

#### Surveillance of journalists and protection of sources

The Media Act (Act CLXXXV of 2010 on Media Services and Mass Communication) stipulates that content providers and journalists are entitled to keep the identity of the source of information confidential in judicial and administrative proceedings and to refuse to hand over any document or object that could identify the source of the information. At the same time, the effective protection of sources is made almost impossible by the wide scope provided for the secret surveillance of journalists. In the Pegasus case, which broke in 2021, it emerged that the Hungarian government had used a sophisticated spy software against multiple prominent investigative journalists. There were no legal (or other) consequences for the Hungarian authorities. The authorities involved all concluded that Hungarian law legally allows for the interception and secret surveillance of anyone without any suspicion of criminal activity. The legal environment has not changed since then. In November 2024, the European Court of Human Rights made a decision in the case of Klaudia Csikós v. Hungary

(application no. 31091/16). The journalist's phone was tapped by authorities in order to locate a source who reported about abuse of authority – the court found that Articles 8 (right to respect for private and family life) and 10 (freedom of expression) of the ECHR were violated. The Hungarian government is in opposition towards this and other aspects of the EMFA. The Action brought on 10 July 2024 – Hungary v European Parliament and Council of the European Union (Case C-486/24) asked for the annulment of the EMFA's Art. 4.

## **National Regulatory Authorities**

The Media Act (Act CLXXXV of 2010 on Media Services and Mass Communication) clearly describes in Sections 109 and 110 the tasks of the media regulator, at the same time, the Media Capture Monitoring Report highlighted that the “decisions of the authority frequently reflect the intentions of the government” and its “independence was called into question due to the fact that decisions were made without debate or opposing votes, a pattern that was observed on a regular basis”(IPI & MJRC, 2024). The appointment procedures of the regulator allow for direct governmental control.

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 of the decisions published on the Media Council's website are only available to the public without the reasoning.

In theory, there are appeals mechanisms. The Media Act defines the cases in which the Media Council's Office acts in the first instance and the cases in which the Media Council itself acts. If the decision at first instance is taken by the Office, an appeal may be lodged with the Media Council. Decisions of the Media Council may in any case be appealed to the courts. The authority has a relatively generous budget – HUF 57.8 billion (EUR 144,0 million) for 2024 and HUF 59.5 billion (EUR 149,1 million) for 2025 –, but it is hard to assess how it is used.

## **MARKET PLURALITY**

### **Transparency of media ownership**

There are no detailed rules on transparency requiring the disclosure of ownership structure of media companies. At the same time, there are company registers and reporting requirements, for businesses in general, and there are publicly accessible registers kept by the media regulator NMHH, on certain kinds of media. Failure to register or to provide information during the licence application process will result in the company not being able to obtain a media service licence. The Media Act requires the media service provider to report changes in ownership structure and penalties can be applied for failure to do so. The transparency of media ownership background is in practice somewhat better than what follows from the legal environment – this is because journalists and researchers are constantly exploring ownership changes and the political connections behind them. There are no specific financial reporting obligations in the media sector. There is no law covering ultimate beneficial owners in the media. The media service providers are not required to, and in most cases do not, make the information required in Art. 6 EMFA proactively available to audiences.

## Media market concentrations

The national law establishes some rules to assess the impact of media market concentrations on media pluralism and editorial independence – but they are not fulfilling all requirements of the so-called “media plurality test”, introduced by Article 22 EMFA. Arts. 68-70 of the Media Act (Act CLXXXV of 2010) describe the limits of ownership share in the broadcasting sector and the Media Council’s activities to monitor the fulfilment of obligations for the prevention of significant market power. These requirements, however, do not reduce the risks to media pluralism and editorial independence.

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 Act, 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.

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. 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, 2021).

## Editorial independence (economic)

Legal and self-regulatory protections for the economic independence of journalists are weak. There is no mechanism granting social protection to journalists in case of changes of ownership or editorial line. Journalist Associations are insignificant, with a very limited membership. Changes in ownership or editorial line have in the past led to multiple journalists losing their jobs. In theory, Art. 7 of Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content would provide protection to journalists from being pressured by owners or editors, but in practice, this is not applied. Political and economic interests are often intertwined – the allocation of advertising (not just state advertising) is politically biased, and there are cases in which commercial interests put pressure on newsrooms (including through SLAPPs). The same act (Art. 20), as well as self-regulatory instruments, require the proper labelling of advertising. Significant media owners have interests in other business sectors, but this conflict of interest is usually not disclosed. So far, none of the remedies foreseen by EMFA are planned to be included in the Hungarian system.

## POLITICAL INDEPENDENCE

### Editorial independence (political)

There is no explicit mention of political independence in the most prominent industry codes, and neither is there a code that could be considered widely accepted and followed in the Hungarian journalistic community. At the same time, independent newsrooms follow their own ethical guidelines or sign up to international codes (including the International Fact-Checking Network and the European Fact-Checking standards Network, in the case of Lakmusz). A new association of media publishers, called Media Forum, has its own code that highlights independence from political actors. Currently, six media companies are part of this organisation. There is limited oversight or enforcement of self-regulation. MÚOSZ (the Hungarian Association of Journalists) oversees its own code of ethics, but it has very limited impact. Its ethics commission published only four decisions last year related to published articles. Its decisions are only mandatory for the 2500 members of MUOSZ. There are no internal bodies in newsrooms to oversee self-regulation.

### State advertising

There are no rules on state advertising, while it is well-documented that state advertising is a major problem in Hungary, often used as a form of covert subsidy for friendly news media. (see also the Media Capture Monitoring Report, 2024). The Mertek Media Monitor (2024) looked at the state advertising spending of 2023 and found significant imbalances: 32% of the spending went to the pro-government TV2 and only 5% to the independent RTL, despite the two tv channels having similar viewership. If we look at only the spendings of the Prime Minister's Office, we can see that 37% of spending went to the pro-government tv channel TV2, 33% to the pro-government publishing house Mediaworks (part of KESMA), 7% to the captured public service media and 10% to Publiment (outdoor banners). Governmental spending on social media is extensive – and opaque. The Hungarian government ("Magyarország Kormánya") was, for example, the second-biggest Hungarian buyer of (political) Facebook ads between Apr 2019 and Jan 2025. It spent HUF 739 million, which is close to EUR 2 million. We only have this information because Facebook has an ad library that makes this information public. State advertising spending is not monitored by authorities.

### Independence of public service media

In theory, the PSM is subject to the general obligation of balanced information (e.g. Art. 13 of Act CIV of 2010 on the freedom of the press and the fundamental rules on media content and Arts. 12 and 83 of Act CLXXXV of 2010 on Media Services and on the Mass Media). The Public Service Code has rules on balanced coverage, nevertheless, fairness and impartiality are not safeguarded in practice. The Mertek Media Monitor (2024) assessed the narratives of the PSM channels M1, Duna and Kossuth Rádió in specific time periods in 2023 and ahead of the elections in May 2024. They found that the coverage was biased towards the government, albeit to a somewhat lesser degree than the private pro-government media (such as TV2 and KESMA's outlets). In the past, the PSM was found promoting narratives from the sanctioned Russian-origin outlet RT (see Kapronczay, 2022 and Urbán et al., 2023). During the election campaign in 2024, the public service media presented political advertisements from the governing party's politicians, disguised as news segments. The Media Council

started an investigation to assess this practice – which might be considered an attempt to influence elections (see Szalay, 2024).

The appointment of key personnel is politically influenced. The chairperson of the (politically controlled) Media Council appoints, sets the salary for and exercises full employer's rights over the MTVA's director general, deputy directors, as well as the chairperson and all four members of its Supervisory Board (see Venice Commission, 2015). The parliament's governing majority makes the decisions about the level of public support for the MTVA. In 2024, the budget increase to HUF 142 billion (EUR 356 million), and the planned budget for 2025 is HUF 165 billion (EUR 414 million). Since the governing parties have a 2/3 majority in parliament, the opposition parties have no influence on this decision. As the extent of funding depends on the governing parties, the funding mechanism creates a financial dependency between the governing parties and the PSM.

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  - 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
  - Péter Nádori, board member at Media Forum
  - Márk Tremmel, teacher
  - 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)
- Media representatives consulted: András Bódis, journalist, editor at Válasz Online, Tamás Bodoky, editor-in-chief of atlatzso.hu, Endre B. Bojtár, editor-in-chief of Magyar Narancs, Gábor Kardos, CEO at Magyar Jeti Zrt., Csaba Lukács, CEO of Magyar Hang, Gáspár Papp, editor-in-chief of MÉRCE.hu and András Pusztay, CEO at Telex

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## 6. MPM Methodology

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. It consists of a questionnaire of 200 variables divided into four main thematic areas - Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness - and 20 indicators. (see Table 1).

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

Table 1: Areas and Indicators of the Media Pluralism Monitor

The results for each thematic area and Indicator are presented on a scale from 0 to 100% and six-tier system: (1) Very low risk (Rounded score comprised between 0 % and 16% included), (2) Low risk (Rounded score comprised between 17% and 33% included), (3) Medium-low risk (Rounded score comprised between 34 % and 50% included), (4) Medium-high risk (Rounded score comprised between 51% and 66% included), (5) High risk (Rounded score comprised between 67% and 83% included), (6) Very high risk (Rounded score comprised between 84% and 100% included). 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.

To carry out the national data collection, the CMPF partners with experienced, independent national researchers (See Annexe I). These answer and score the variables contained in the questionnaire developed by the CMPF and author the narrative reports. The CMPF staff reviews the work of the national experts at each stage of the implementation of the MPM, including the data collection and the national report. 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.

This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2024. 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 implemented 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

**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/>.**

## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2025 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>Mérték Media Monitor &amp; Eötvös Loránd University</i>	
<i>Agnes</i>	<i>Urban</i>	<i>Associate professor and Chair of the Infocommunications Department</i>	<i>Mérték Media Monitor &amp; 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>Levente</i>	<i>Nyakas</i>	<i>Head of Institute</i>	<i>Institute for Media Studies at National Media and Infocommunications Authority</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 &amp; Rights Lead</i>	<i>Civil Liberties Union for Europe (Liberties)</i>
<i>Zselyke</i>	<i>Csáky</i>	<i>independent media and policy expert</i>	
<i>Katalin</i>	<i>Havas</i>	<i>Secretary General</i>	<i>Repropress Association for the Reprographic and Neighboring Right of Publishers</i>

## ANNEXE III. PEER-REVIEWING OF THE COUNTRY REPORT

This country report has been peer-reviewed by:

First name	Last name	Position	Institution
<i>Krisztina</i>	<i>Rozgonyi</i>		

For a list of selected countries, the final country report authored by the country team has been peer-reviewed by a leading academic

in the field of media and in the concerned country. The procedure aims at maximising the accuracy of the final report. The country report does not necessarily reflect the views of the peer-reviewer, however the latest acknowledges that there is enough empirical evidence to justify the content of the country report.

The country reports that are submitted to peer-reviewing are selected in a way that they represent all the different regions of Europe. Among the criteria of selection were: 1) a quickly- evolving situation over the past year, 2) a change of country team, and 3) the presence of high risk evaluation in the previous country reports.

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