

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

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

Country report: Portugal

Francisco Rui Cádima, ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)

Carla Baptista, ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)

Luís Oliveira Martins, ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)

Marisa Torres da Silva, ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)

Patrícia Abreu, ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)

Research Project Report

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1. About the project

1.1. Overview of the Project

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

1.2. Methodological notes

Authorship and Review

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

In Portugal the CMPF partnered with Francisco Rui Cádima, Carla Baptista, Luís Oliveira Martins, Marisa Torres Da Silva and Patrícia Abreu (ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

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

Table 1: Areas and Indicators of the Media Pluralism Monitor

The Digital Dimension

The Monitor does not consider the digital dimension to be an isolated area but, rather, as being intertwined with the traditional media and the existing principles of media pluralism and freedom of expression.

Nevertheless, the Monitor also extracts digitally specific risk scores, and the report contains a specific analysis of the risks that related to the digital news environment.

The Calculation of Risk

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

Scores between 0% and 33%: low risk

Scores between 34% and 66%: medium risk

Scores between 67% and 100%: high risk

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

Methodological Changes

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

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

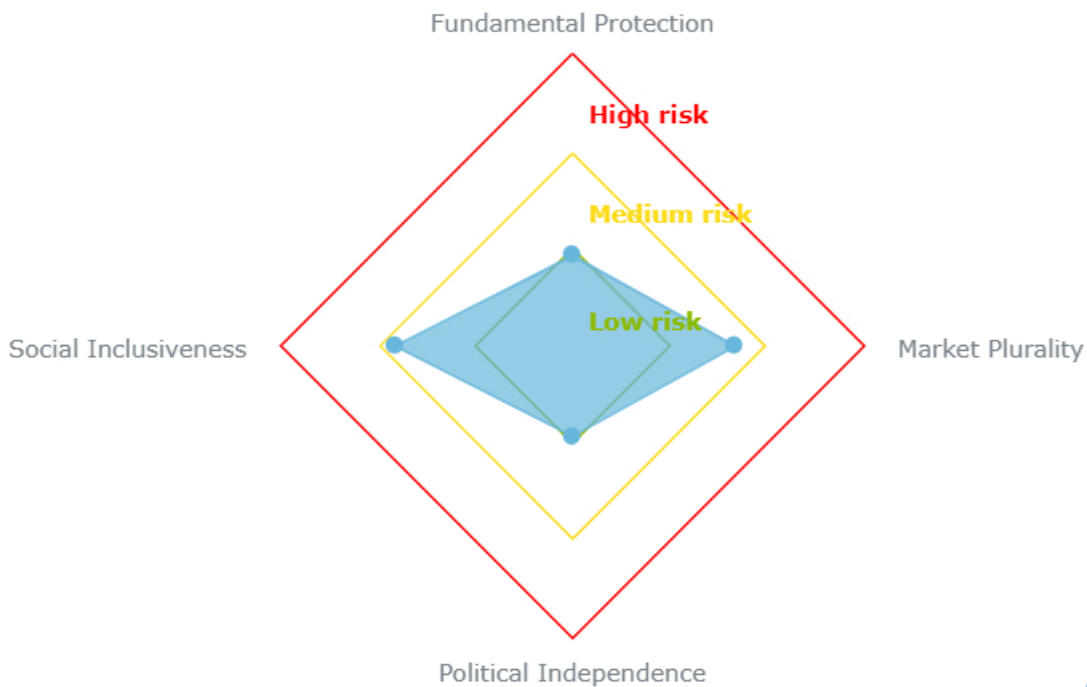
2. Introduction

- **Country overview and languages spoken.** Portugal is located in the extreme west of Europe, on the Iberian Peninsula. Its population is currently 10.4 million citizens (Pordata, 2024), and its official language is Portuguese.
- **Minorities.** In a strict sense, and the context of the Portuguese legal framework, Portugal is a country of great population homogeneity, with no minorities, which does not invalidate the fact that there are large communities from former African colonies (namely Angola, Mozambique, and Cape Verde), and Brazil. More recently, also from countries such as Ukraine and Asian countries such as India, Bangladesh, and Nepal (in this case, in a critical process referred to by the Portuguese media as being associated with clandestine immigration promoted by mafias that control human trafficking in those Asian countries and Portugal) (Costa, 2023; SIC Notícias, 2023a).
- **Economic situation.** The Portuguese economic situation remains somewhat precarious, with the country at the bottom of Europe regarding economic growth. Data from the OECD (2023) states that “Portugal’s recovery has slowed in the face of high energy and living costs, as well as global uncertainty”. From this perspective, “decisive policy action and structural reforms are needed to shore up public finances, uphold living standards and ensure that growth remains on a sustainable and resilient path”. After a strong recovery with GDP growth of 6.8% in 2022, Portugal's GDP growth slowed to 2.3% in 2023, but clearly above the European Union average (0.4%).
- **Political situation.** The political situation worsened in 2023 with the resignation of Socialist Prime Minister António Costa (November 7, 2023) after a statement from the Attorney General's Office accused him of possible links to a government corruption case under investigation. Following the events, the PM's chief of staff was arrested, and the judicial authorities found thousands of euros hidden in his office. Days later, the Minister for Infrastructures, João Galamba, resigned (November 13, 2023). In the meantime, the PR declared that the way out of the crisis would be the dissolution of the Parliament and new elections. On March 10, 2024, the AD (Democratic Alliance), constituted by Social Democrats (PPD/PSD), Christian-Democrats (CDS) and Monarchists (PPM), won the elections (with 29%) and should be called upon by the President of the Republic to form a new government. The PS (Socialists), which led the previous government with an absolute majority, has conceded defeat (28%) and will be in opposition to the new government. But what also clearly marks this election is the strong rise of the far right (Chega party), which obtained 18% of the votes.
- **Media Market.** Over the last year, the media market in Portugal has been badly shaken by the management and financial crisis that has hit the newsgroups Global Media, Impala and Trust in News and the sports weekly A Bola. Nevertheless, in general, all media companies are going through a moment of deep crisis in the sector. Luís Simões, president of the Journalists' Union, said that the word most often mentioned during the 5th Journalists' Congress (Lisbon, January 18-21, 2024) was "emergency": "In fact, it is the word that suits the sector, because it is a sector with wage arrears, with increasingly low wages, with much precariousness and it is a sector that's going through difficult times." (Lusa/Jornal de Negócios, 2024). This context is, therefore, no stranger to the announcement of a general strike by journalists scheduled for March 14, 2024.
- **Regulatory Environment.** In the context of sector regulation, there have been no significant changes since last year. The problems identified in previous years remain, namely the existence of 3 different

authorities that divide the regulation of the sector (ERC, Anacom and AdC), the lack of transparency in the appointment of boards and, specifically in the case of the ERC, insufficient public funding for the increasingly complex regulatory tasks.

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

Portugal: Media Pluralism Risk Areas



JS chart by amCharts



The general situation in Portugal remains satisfactory, as the country has risk levels below the European average in three different areas, with the only exception being **Social Inclusiveness**, where there is a medium (close to high) risk, at **61%**. In the other areas, the values are low risk for both **Fundamental Protection (31%)** and **Political Independence**, also with **31%**, and medium risk for Market Plurality, with **56%**. However, if we look at this year's data compared to last year's, we see a general trend of worsening risk in all areas. In 2023, **Social Inclusiveness** had an average risk of **59%**, **Fundamental Protection** and **Political Independence** had low risks of **28%** and **20%** respectively, and **Market Plurality** had an average risk of **52%**. This growing trend is a cause for concern regarding the recent evolution of media pluralism in Portugal.

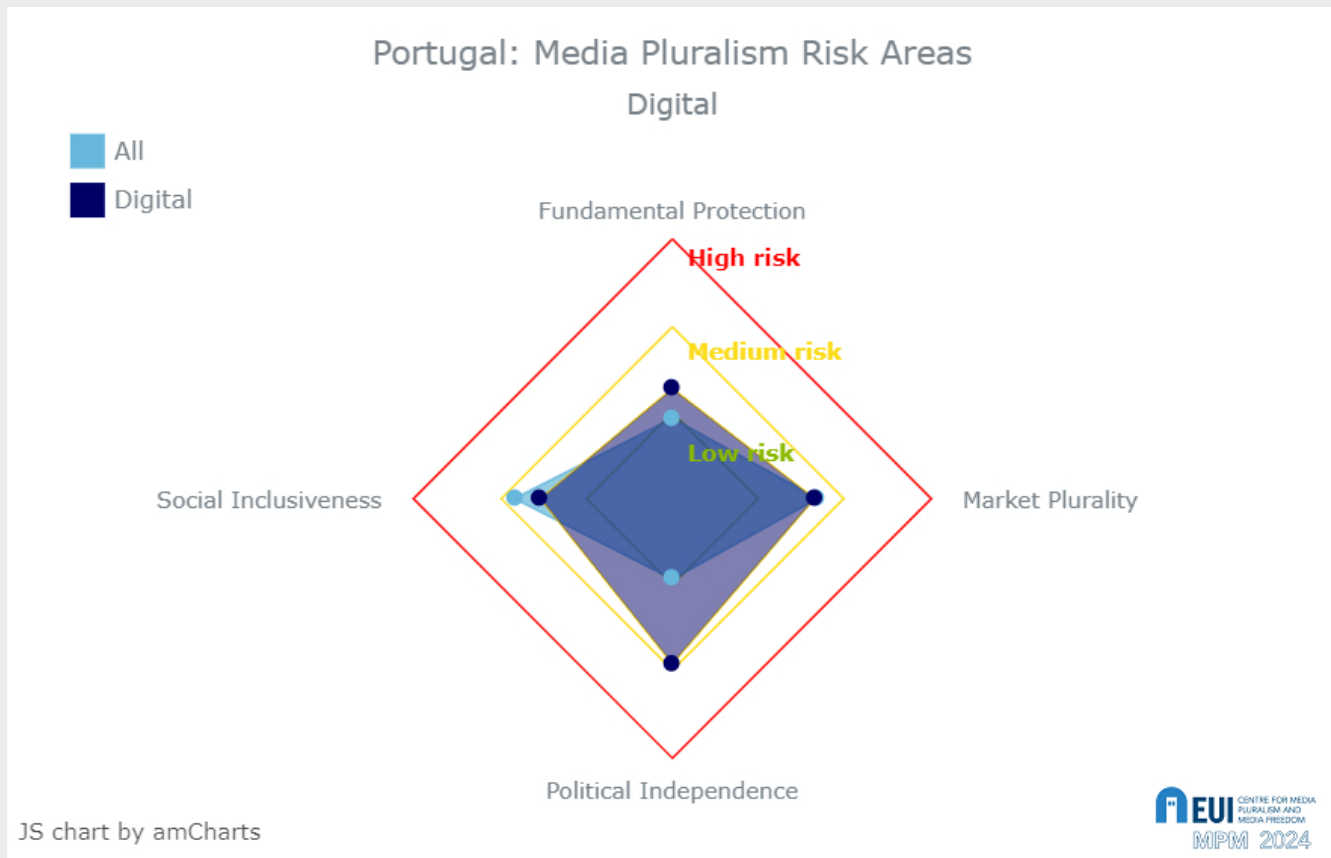
Specifically concerning the area of **Fundamental Protection (31%, low risk)**, which undoubtedly represents "the regulatory backbone of the media sector in every contemporary democracy" (Cádima, 2023), it is clear from the data obtained this year that the areas of greatest concern are those related to the status of journalists and the independence and effectiveness of the national regulatory bodies. Regarding the sub-indicator on the **Working conditions** of journalists (scoring **63%**, nearly high risk), the situation has worsened and the media sector, in general, is now in a more precarious economic situation than it was in 2022. Also noteworthy is the sub-indicator **Proportional balance between FoE protection and dignity**, which scores **67%** (high risk), mainly due to the fact that in Portugal defamation can lead to imprisonment. Concerning sector regulation, which continues to be divided between various entities (ERC, ANACOM, AdC, IGAC), it is therefore increasingly clear that there is a need to review the general regulatory model, as well as the policy for appointing boards, and also the funding model for the ERC, which in any case remains the specific regulator for the media sector.

Market plurality (56%) presents a medium risk to media pluralism, as it did in the previous year (52%). The high risks in this area are related to the **Plurality of media providers (79%)** and **Plurality in digital markets (78%)**. Four players control the media business: Impresa, Cofina, Media Capital, and Global Media. The regulatory framework has not been updated to consider the digital markets. The law does not prevent cross-media concentration nor foresee horizontal concentration within traditional and digital media. Regarding **Media viability** and **Editorial Independence from commercial and owner influence**, the risk is medium, with **49%** and **53%**, respectively. The media sector still struggles, mainly due to inflation and high costs. Also, there have been some challenges in applying the transparency laws regarding the commercial interests of media organizations. The **Transparency of the media ownership (19%)** indicator reveals low risk. In general, media companies follow the law and disclose their ownership structures. Most media groups publish transparent data on their direct and indirect owners, and the regulatory body (ERC) has access to this information. However, this model needs to be more assertive to avoid situations in which investment funds whose identity is inscrutable become owners of media companies or groups, as happened this year in the case of Global Media Group.

Political Independence marks low risk (**31%**, compared to last year's 20%). The media are still independent, as the regulatory framework prevents significant intrusions from political power, prohibits political commercial advertising during electoral periods, and protects journalists. At the same time, the area experienced significant increases in the risk levels of some indicators. The indicator Political Independence of the media registered increased concerns when it comes to the implementation of safeguards against conflict of interest, the role of private shareholders in Lusa news agency, as well as to issues detected in the radio sector. Editorial autonomy is threatened by the continuous degradation of the journalistic profession and the lack of resources to investigate and scrutinize power. Local media is the most vulnerable sector, but all media increasingly engage in paid content practices, undermining trust and professional ethical values. The state's support for media has remained the same for decades, and there is an urgent need to review and enlarge public measures to help and support journalism and protect journalists' jobs. PSM has stable governing models but lacks funding to invest in digital transformation and the fight against disinformation.

The **Social Inclusiveness** area (**62%**) presents a medium-high risk (59% last year). Its score is affected by the high risk of the indicators **Local/regional and community media (69%)** and **Gender equality in the media (68%)**. The economic and financial difficulties of the Portuguese media landscape particularly affect local media. Besides, women still lack fair representation in media coverage, opinion-making, and management boards.

Focus on the digital environment



By making a general assessment of the various areas in the context of the digital environment, we can see that the evolution of the risk to pluralism from 2023 to 2024 is differentiated. In three of the areas, there has been a risk reduction this year: **Market Plurality**, **Political Independence**, and **Social Inclusiveness** have seen a drop in risk. In the case of **Political Independence**, this is a drop from high risk (67,6% in 2023) to **63.6%** this year, thus moving to medium risk. There are slight drops in the case of **Market Plurality** and **Social Inclusiveness**, from 59% to **55%** in the first case and from 52% to **51%** in the second case, with medium risk remaining in both areas. The **Fundamental Protection** area has seen its average risk increase from 31% in 2023 to **42.3%** this year. This is a significant increase in risk, which we analyze below.

The justification for the increase in risk in this area of **Fundamental Protection (42,3%)**, which is essential for pluralism in democratic societies, relates, for example, to the assessment of the issues of transparency and detail of public information in terms of content blocking and filtering, both by the state and by digital platforms, namely in the area of Protection of Copyright and Related Rights in the digital environment. Also concerning the sub-indicator on **Net neutrality (67%)**, there are still some important issues to be solved and improved in the technical, commercial and legal fields. Both in terms of extending access and **Broadband coverage (50%)** and, as was the case last year, in terms of some aspects related to zero-rating and similar offers.

The **Market Plurality** area shows the same risk (**55%**) in the digital environment compared to the overall risk. The regulatory agencies do not consider the digital intermediaries, which culminates in the absence of the digital markets' expansion within the regulatory framework. The Media Regulatory

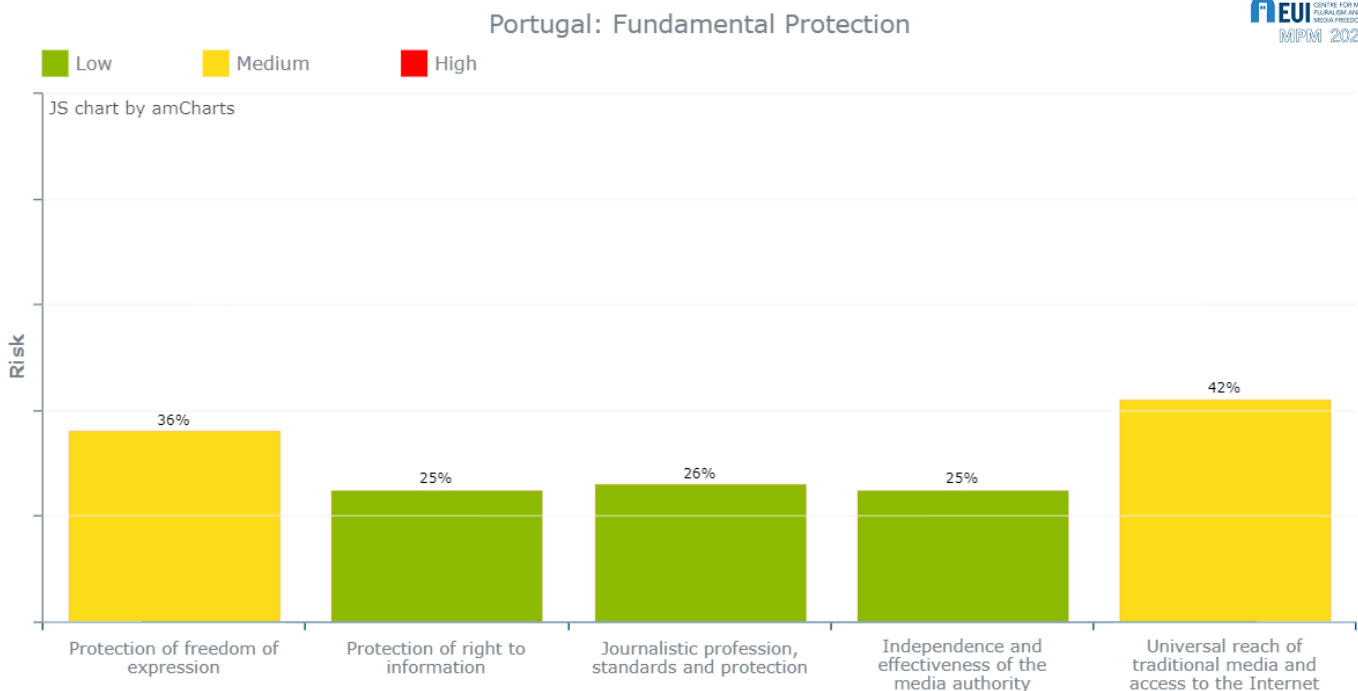
Authority (Entidade Reguladora para a Comunicação Social - ERC) and The Competition Authority are responsible for intervening in any economic transaction that threatens diversity and pluralism. Still, their sanctioning and enforcing powers are limited concerning the digital markets. On a more positive note, the Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market has been transposed to the Portuguese Legislation on the 19th of June, being effective ever since. Regarding the media environment, some economic groups have been investing in the transition toward digital revenue, and there are examples of digital native media organizations focused on innovation. However, the new business models and practices based on digital revenues are still fragile. Portuguese media companies have considerable difficulties in the digital advertising markets in the face of competition from large international players.

The risk level of the **Political Independence** area in the digital environment is medium (**64%**), but there are reasons for concern. The existing media regulation framework is outdated and cannot effectively sustain political control over digital media. Similar fragility exists in the current rules on political advertising online. The provisional agreement between the Council and the European Parliament (November 2023) for a new regulation on the transparency and targeting of political advertising far exceeds what the current national law demands in terms of transparency. However, there are no supervision mechanisms yet in place. Global digital platforms are only self-regulated, and accountability depends entirely on the Code of Practice on Online Disinformation commitments.

Protection against disinformation and hate speech is one of the indicators concerning the digital environment of **Social Inclusiveness (51%)**. Initiatives to monitor disinformation are growing, and international disinformation trends still have little traction in Portugal. However, a national strategy to foster cooperation between different stakeholders to tackle information disorders is still absent in the country. Since last year's report, there have been no effective changes concerning monitoring and protection against online hate speech.

3.1. Fundamental Protection (31% - low risk)

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



The overall risk in the **Fundamental Protection** area remains low this year (**31%**). However, there has been a slight worsening compared to 2023 (28%), which can be identified above all with the increase in risk seen in all the different indicators in this area, except the **Protection of right to information** indicator, which this year drops from medium risk (it had obtained 38% in 2023), to low risk, with **25%**. Also noteworthy is the increase in the average risk of the **Universal reach of traditional media and access to the Internet** indicator, which in 2024 rises from 35% to **42%**.

Starting with a more specific analysis of each indicator per se, in the **Protection of freedom of expression** area, there is a clear increase in risk this year, from 27% (in 2023) to **36%**, thus moving from low to medium risk. The explanation for this is essentially due to two facts: on the one hand, the maintenance of legislation that criminalizes defamation, despite good European practices and the recommendations of the International Press Institute (IPI, 2015) and the European Commission (EU, 2022); on the other hand, there is a lack of detailed and transparent information about the online blocks that digital platforms and IGAC (Inspeção-geral das Atividades Culturais - *General Inspectorate of Cultural Activities*) decide in light of the Portuguese legal framework. In terms of IGAC, in 2022, under the Protection of Copyright and Related Rights, and concerning content available on the Internet, 157 complaints were examined and dealt with in the following areas: “74 computer games, 46 streaming, 15 books, 16 press, and 6 audiovisuals. These complaints covered 168 domains, in which the removal/blocking of 165 domains was determined (referring to 154 of the complaints made), corresponding to a rate of 93.3%.” (IGAC, 2023).

In the case of the **Protection of right to information** indicator, as mentioned above, this year it has a low risk, which is a clear improvement from the medium risk assessed last year, and is now back at **25%**, a figure also obtained two years ago. However, the problem of access to information remains. In practice, the public administration, in some cases, denies or delays citizens' access to information (CADA, 2022). And as far as the regulatory framework in place to protect whistleblowers is concerned, it is not always effective. Portuguese legislators ignored not only the recommendations of experts and civil society organizations, such as Transparency International Portugal (TIP, 2024) but also the European Commission itself (EU, 2022). By transposing the EU Whistleblowing Directive into national legislation, Portugal should have taken the opportunity to reinforce its impact. In fact, the law limits the ability of whistleblowers to report directly to authorities (Law No. 93/2021). In Portugal, through this act, only people who report or disclose infractions based on information obtained in the context of their professional activity are protected by law.

The indicator on the **Journalist profession, standards and protection** presents a low risk, with **26%** (20% last year). This area has been clearly hit in recent months, both by worsening working conditions and salaries and by its most direct cause, i.e., the sectoral crisis of media groups in a very small market like Portugal. According to the Journalists' Union at its recent Congress, held in January 2024, the profession's risks in terms of standards and protection are clearly higher. However, the final result of our assessment is still low risk, albeit with a 6-percentage point increase from last year's MPM assessment. The indicators that deserve a medium/high-risk rating are exactly the Working conditions (63%) and also editorial independence and/or respect for professional standards. Editorial independence is also related to the journalists' working conditions, and these are deteriorating more and more. As Licínia Girão (president of the CCPJ - Journalists' Professional License Committee) mentioned at the meeting on "The Media Sector in Europe - what challenges for Portugal within the framework of the European Media Freedom Act," "Journalism today is a strange place. Where journalists find it increasingly difficult to stay and some even, as testimonies, news, and reports have shown, to access." (CCPJ, 2023).

As far as SLAPPs are concerned, there are no sources or reports on this phenomenon in Portugal, and to our knowledge, no organization monitors it.

Regarding the indicator **Independence and effectiveness of the media authority - 25%** (22% last year), we maintain the low risk despite the issues relating to the need to review the regulatory model, whether in terms of deepening the model for appointing the regulatory board, reviewing the ERC's funding system, or even the very possibility of moving towards a single regulator for media, communications and digital, progressively bringing the ERC closer to ANACOM. In fact, the ERC's Appointment procedures are designed to minimize the risk of political or economic interference, but they are not fully effective. Regarding budget funding and other regulatory bodies' resources, such as human and technical resources, they are somewhat inadequate but still allow the ERC to perform its function. It is worth noticing that in February 2024, the current Socialist government approved the Decree-Law designating ANACOM as the competent and coordinating authority for digital services (DSA) in Portugal (Decree-Law No. 20-B/2024). The law also defines the Regulatory Authority for the Media (ERC) as the competent authority for media and other media content. The General Inspectorate for Cultural Activities (IGAC) is the competent authority for copyright and related rights, thus complying with Regulation (EU) 2022/2065 of the European Parliament and the Council on a single market for digital services.

Finally, with regard to the indicator **Universal reach of traditional media and Internet access**, there was a clear worsening of the average risk, with an increase of 7 percentage points - to **42%** (from 35% last year). This indicator's most critical issues are related, for example, to Broadband Coverage (50%, medium risk, increase, from 25% last year to 50% this year, is due to methodological changes, including changes in

the data sources). The percentage of the population covered by broadband is 92%, below the 98% percentage representing medium risk in itself. The country's regulatory safeguards relating to Net Neutrality (67%, high risk) are not fully implemented in practice. In 2023, ANACOM ordered the cessation of zero-rating and similar offers because they discriminate, on commercial grounds, between traffic related to zero-rated applications and other traffic (ANACOM, 2023). Still, on this sub-indicator, it should be noted that Ownership concentration in Internet Service Providers (ISPs), assessing the concentration of the ISPs in the country, the percentage of market shares of the TOP 4 ISPs is 98%. Finally, it is not completely clear that ISPs manage network traffic in a transparent, impartial, and neutral way without discriminating against particular types of content or content from particular sources, as also confirmed by ANACOM in its analysis (ANACOM, 2023).

Focus on the digital environment

In the field of **Fundamental Protection (42%)**, some of the key issues regarding the digital environment are the guarantees for freedom of expression/right to information online. As a general principle, for both traditional and digital media, there is no doubt that these guarantees are safeguarded not only in the Constitution of the Portuguese Republic but also concerning the ECHR framework and the international context of human rights.

Another question is whether the Portuguese state generally refrains from filtering, and/or monitoring, and/or blocking, and/or removing online content arbitrarily. Here, too, it is clear that Portugal respects the rule of law and the determination of the ECHR, i.e., there is no evidence that the State can filter/remove content arbitrarily.

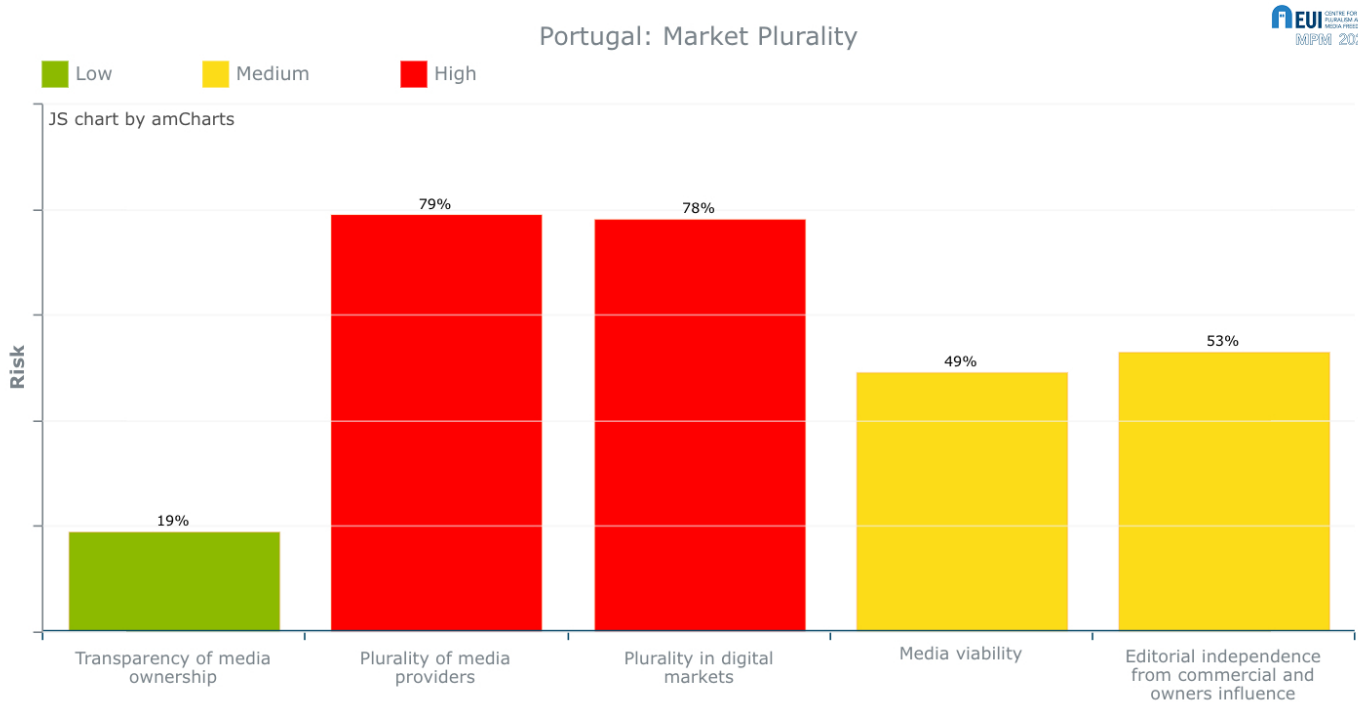
However, the information available on filtering/removing content doesn't seem detailed enough for us to have all the guarantees on this matter. That is to say, the 2022 Statistics Bulletin of IGAC (IGAC, 2023) only provides great numbers and segmentation of the complaints by area. Still, it does not specify each case or clarify the reasons given for the blocking decision.

In order to be sure that there are no situations of indiscriminate or non-proportional blocking, following the rule of law, either by the Portuguese public authority (IGAC) or by the digital platforms, there must be a database that centralizes information at the national level, and that clearly identifies each blocking situation with full clarification of the legal and administrative reasoning that led to the blocking of a particular content.

Those situations, as well as NGA broadband coverage/availability in the country and some problems with regulatory safeguards regarding neutrality of the network (in 2023, Anacom determined the cessation of zero-rating and similar offers because they discriminate, for commercial reasons, between traffic related to zero-rating applications and other traffic), justify the worsening of the risk in this digital area of **Fundamental Protection to 42%**.

3.2. Market Plurality (56% - medium risk)

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



In 2024, the risk level of the **Market Plurality** area is **56%**. In the previous year, it was 52%. Therefore, there is a slight increase in this specific risk level. It is still considered to be a medium risk. Two indicators score high within this area, as they did the previous year: **Plurality of media providers (79%)** and **Plurality in digital markets (78%)**. **Media viability** scores **49%** but is still in the medium-risk area. However, unlike the previous year, **Editorial independence from commercial and owners influence (53%)** shows an increase from 25% to 53%, entering the medium-risk area. The **Transparency of media ownership (19%)** indicator remains the same.

The indicator on **Plurality of media providers** scores **79%** (high risk). The media market remains the same as in previous years. The Law that rules ownership has remained the same. The private media business in Portugal is controlled by four players: Impresa, Cofina, Media Capital, and Global Media. RTP (Rádio e Televisão de Portugal) is the State-Owned group. The TV sector has high concentration levels, with considerable dominance from two major private-owned operators. In the radio sector, there are two private groups with very significant market power. A small number of economic groups also dominates the press. ERC - Entidade Reguladora para a Comunicação Social (Law 53/2005) is the specific authority for the media. The Autoridade da Concorrência (Competition Authority) also intervenes in the media sector as a monitoring system, protecting the competition environment and safekeeping the consumer's interests and market diversity. Nevertheless, the law does not prevent cross-media concentration, and it does not foresee horizontal concentration within traditional and digital media. Even though ERC (Law 53/2005) does intervene in the sector as a monitoring system, there have been some obstacles to effective control by the regulator. The only restrictions for traditional news media in Portuguese Law relate to the distribution of

share capital and turnover.

The indicator **Plurality in digital markets** scores **78%**: high risk. Regarding the digital environment, regulatory agencies have not yet considered the role of digital intermediaries, which needs to be addressed urgently. No law still considers digital markets or the expansion of online media platforms. The advertising market is supervised by The Competition Authority and the Media Authority, but it does not include specifications for the online market. The Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market has finally been transposed to the Portuguese Legislation on the 19th of June, after two years of delay (due to the falling of the government in consequence of the budget for 2022). It has been fully effective since. The new law includes a set of factors and criteria to be considered in determining the remuneration of the providers when using copyrighted content, as well as the definition of information duties and transparency rules. However, the law has had some implementation errors. It has been transposed literally to the Portuguese Legislation, disregarding specificities of the national regulation, especially regarding Article 17. It does not provide enough information on balancing user rights or additional transparency provisions and fails to disclaim the platforms affected by these rules (Communia Association, 2023).

The indicator for **Media viability** is **49%**, which is considered medium risk. It has improved compared to the previous year (in which it scored 58%). Firstly, within the State Budget for 2023, the Government announced an upgrade of the financial support for the regional and local media (+12,5%), which had not happened since 2015. In 2022, the Portuguese local and regional press received 4M€ to be allocated to incentives for reading and digital development, technological modernization, accessibility, media literacy and education, and the development of strategic partnerships. However, the increase in the price of paper and printing has affected many publications. The failure to review the terms of access to paid postage, the percentage of state contribution, and the failure to develop support models aimed explicitly at digital models, as well as by the state, left regional newspapers at a dead end. Concerning the journalist profession, there are 5.313 journalists with Professional License (Carteira Profissional de Jornalista) in Portugal at the moment (data from January 2024). The number last year was slightly higher (5.425). In 2023, journalists in Portugal have been demanding better working conditions, with strikes and protests taking place in various locations. Their demands include better wages and more job security. The big media companies' revenues show a tendency of stable growth when compared to the previous year. Portugal has struggled with considerable inflation rates. The TV sector has grown by 14.2% in 2022. Inflation was 8% in that period. Impresa's TV revenues decreased by 3.1%, Media Capital's TV revenues increased by 7%, Cofina's TV revenues increased by 16.1%, and RTP (Public Service Media) increased by 3%. The revenues of the radio broadcasting sector have increased by 9% from 2021 to 2022. The advertising revenues in the radio sector show consecutive decreases between 2018 and 2020. In 2021, there is a small growth, and the same happens in 2022, but the numbers are significantly lower compared to 2018. Regarding Newspapers and Press Agencies, there is a very small increase of 0,5% in 2022 compared to 2021. This is well below the inflation rate (8,1%). Between 2018 and 2022, there has been a constant decrease in Newspapers' advertising revenues. The revenues for 2022 are less than half when compared to 2018. This sector shows a firm reliance on print advertising. The circulation of traditional newspapers and magazines has shown growth, probably related to the end of the COVID-19 pandemic. However, the number of paid digital subscriptions has decreased. There have been some innovative sources of revenue from media outlets. SIC channels became part of the platform Playce, a segmented advertising system that allows publicists to target a specific type of audience through advertising on television (viewed through recording). Some outlets like Expresso and Público have invested in an early transition towards digital revenue and the introduction of paywalled content online in a gradual way, even though the market does not seem very interested in paid

subscription news services. There is growing investment in podcasts and audio content from digital-native outlets like Observador and traditional print brands like Expresso. Numbers show that 38% of the Portuguese listen to Podcasts. Some digital-native outlets show more innovation. We would highlight the following examples: Fumaça is a narrative/investigative journalism podcast with free access and non-profit; Divergente is a narrative journalism digital magazine focused on scrutinizing power structures. It provides new ways of storytelling through illustrations and photography. For example, Interruptor is an independent multimedia magazine focused on data journalism and is an associate member of the European Data Journalism Network.

The indicator **Transparency of media ownership** reaches **19%**, which is a small risk. Media companies are required by The General Media Transparency Law 78/2015 to disclose their ownership structures. Most media groups publish transparent data on their direct and indirect owners, and the regulatory body (ERC) has access to this information. The Law also states the transparency of media financing, which includes financial information and financial flux. It is also mandatory for media groups to disclose the information of individuals or legal entities who have contributed to at least more than 10% of the income of the company or are relevant credit holders. However, how much money is invested in media is not publicly disclosed, which causes doubts about the real financial dimension of some deals (Costa e Silva et al., 2022). Also, anyone can become a media owner, as there is no “suitability clause,” and sometimes, the real interests of the beneficial owners are not fully transparent (Costa e Silva et al., 2022). If the company is not the direct owner of a media outlet, it is not required to disclose its financial status.

The indicator **Editorial independence from commercial and owners influence** reflects a medium risk: **53%**. It is the indicator with the largest increase compared to last year (25%). In many cases, there are owners of the leading media in the country that have relevant interests, links, or activities in non-media businesses. Grupo Media Capital, one of the major media groups, is owned by several investors that operate in the industrial and IT sector (Pluris Investments, CIN). Público, one of the most important daily newspapers, is owned by an industrial and retail group (Sonae) that also owns an important operator of cable television and internet distribution as well as retail, real estate, investment in technology and financial services. Global Media, a more recent media player, is owned by several investors with interests outside the media sector. The major shareholder (WOF) is an Investment Fund, and Grupo BEL is an industrial operator. In Portugal, in general, hiring and dismissing journalists, including editors-in-chief, are not dependent on the commercial interests of a media organization. The legal framework stipulates that journalists are protected, although it is hard to say that these mechanisms are always effective. The Journalists Statute (Law nº1/99) clearly states that journalists may not be obliged to express or subscribe to opinions or to refrain from doing so or to perform professional tasks that violate their conscience; they may refuse editorially-based orders and have the right to oppose the publication of their work even if the media outlet is owned by the company or economic group to which they are contractually bound. The law also states that news media companies are obliged to maintain editorial independence from commercial interests. Also, sponsored content must be identified as such. However, many challenges have arisen for professional journalism in 2023. The Global Media Group case is the most significant. The newsroom councils of the outlets of Global Notícias have contested the board of administration for having hired a journalist directly instead of being a decision from the editor-in-chief. Many journalists from TSF, O Jogo, and Jornal de Notícias have unpaid wages, and many were also laid off, which caused the TSF radio management to resign. The TSF Editorial Board accused the management of Global Media of interference by suspending all programs until the new management takes over. There is evidence to say that some media programs were canceled by news directors (allegedly pressured by the new stockholders) and some reports of stockholders' attempts to directly influence editorial content, which is unheard of and causes

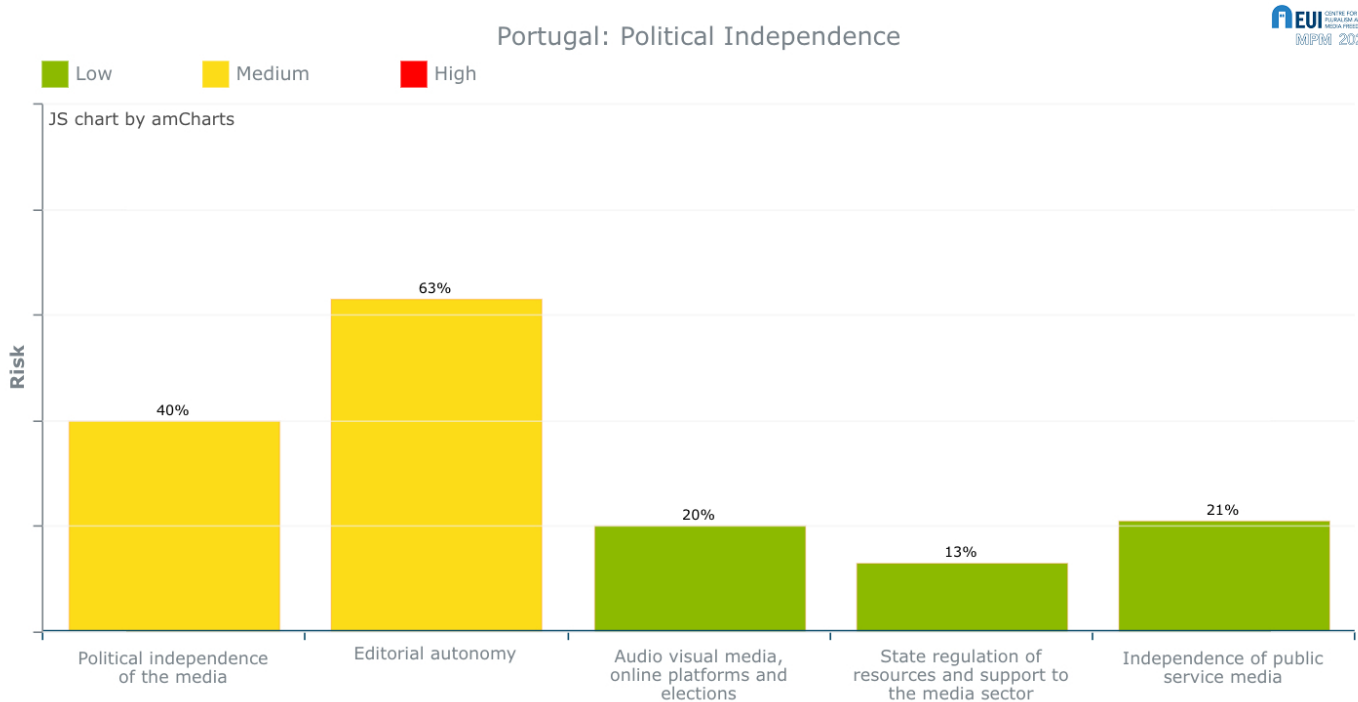
concerns about the autonomy of editorial decision-making. At the beginning of 2024, the Regulatory Council (ERC) approved the opening of an autonomous administrative process for applying the Transparency Law regarding this situation. On the 19th of March, the major shareholder (WOF), an Investment Fund, was considered by ERC to have a lack of transparency, which means suspending the exercise of voting and property rights, among other actions.

Focus on the digital environment

The **Market Plurality** area shows the same risk (**55%**) when it comes to the digital environment compared to the overall risk. The regulatory agencies do not consider the digital intermediaries, which culminates in the absence of the digital markets' expansion within the regulatory framework. Entidade Reguladora para a Comunicação Social (ERC) and The Competition Authority (AdC) are responsible for intervening in any economic transaction threatening diversity and pluralism. Still, their sanctioning and enforcing powers are limited concerning the digital markets. The latest data suggests that Google and Facebook partake in a substantial share (70%) of the online advertising revenue in Portugal (even though they do not share this information publicly). More positively, the Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market has been transposed to the Portuguese Legislation on the 19th of June, being effective ever since. As many other countries, while pending the overall agreements on the international reforming process (Pillar One and Pillar Two), Portugal has implemented a national web tax, the Digital Service Taxes (DST), on the scope of audiovisual commercial communication on video-sharing platforms and subscriptions for video-on-demand services. It has been effective since February 2021, with a tax rate of 4.1%. Regarding the media environment, some Portuguese media groups have been investing in the transition toward digital revenue, and there are examples of digital native media organizations focused on innovation. However, the new business models and practices based on digital revenues are still fragile. Portuguese media companies have considerable difficulties in the digital advertising markets in the face of the competition of large international players.

3.3. Political Independence (31% - low risk)

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



The **Political Independence** area presents low risk (**31%**), 11 percentage points higher than in 2023.

The indicator **Political independence of the media** is at medium risk (**40%**), 27 percentage points higher than the 13% result of 2023. This was due to increased risks concerning the implementation of safeguards against conflict of interest, as well as new sign of concerns in the radio sector and for the Lusa news agency.

Portugal has regulatory safeguards prohibiting media proprietors from holding government office in the audiovisual sector. The presence of political control in newspapers and digital media is not scrutinized. The Law on Television and Audiovisual Services on Demand (Law n.º 27/2007) prevents politicians, political parties, and political associations from owning or engaging in television or radio activities. The Transparency Law (Law n.º 78/2015) imposes upon media operators disclosure obligations on media ownership and the business and financial interests or activities of the media's direct, indirect, and beneficial owners. The significant erosion of this indicator shows that additional measures are necessary to attain meaningful transparency. The shortcomings in the Transparency Portal database aggravate the risk of conflict of interest, both at the national and the regional/local level. Many media companies provide only general data and the national database of media ownership should articulate into an EU-wide database to be effective. The Journalists' Professional License Committee (CCPJ) has recently denounced that local media is being used to publish commercial and politically sponsored content as news to promote local authorities, including mayors and other influential individuals.

The news agency Lusa depends on the approval of the budget law and is, therefore, subjected to political instability and institutional procedure delays. In July, the Council of Ministers Resolution nº 64/2023 authorized additional expenditure because the circumstances underlying the contract changed unforeseeably due to the external situation, the consequent increase in operating costs, and the salary update agreed for the state business sector. The Court of Auditors' approval was only granted in January 2024, delaying the transfer of funds and forcing the cancellation of investments in digital transformation and the fight against disinformation. The deal for the purchase by the State of 45.7% of the share capital of Lusa, owned by the private companies Global Media and Páginas Civilizadas, also did not materialize. The deal provided for the future free service of Lusa within a framework of public support for the media but was backed off due to the lack of consensus between the parties after the fall of the government in November 2023.

The indicator **Editorial autonomy** scores **63%** - medium risk, close to high risk, and 25 percentage points higher than in 2023. The Journalist's Statute (Law nº 1/1999) broadly protects editorial autonomy, and the Portuguese Media Regulatory Authority (ERC) has monitoring powers over the appointment and dismissal of directors and editors-in-chief in PSM. Political motives influencing these recruitments in the private media universe have not been investigated. The self-regulatory culture is weak, and journalists' associations and representatives have a discrete presence in public debate and very little social influence. Growing native digital media outlets are usually deprived of self-regulatory mechanisms, such as newsroom councils. These are also inactive in many regional and local newspapers and radio stations. Political journalism is very opinionated and often uses anonymous sources, adding to opacity in political reporting. This trend in journalism practices is complemented by the increasing use of politically situated commentators, who have a very influential presence on all television channels. There are no regulations to assure an equitable representation of the diversity of opinion in political commentary, which has become part of news programs. According to an academic study (MediaLab ISCTE, 2024), political commentators on television have increased by 47 per cent in the last eight years (from 53 to 78); the majority are right-wing, and only a quarter is women.

The **Audiovisual media, online platforms, and elections** indicator score low risk (**20%**, aligned with the 23% result of last year). Law nº. 72-A/2015 establishes the legal regime for news coverage during election periods and prevents political propaganda through commercial advertising on radio and television. This legal framework is the main support for political pluralism. ERC is mandated to monitor the diversity of political actors in the media and produce an annual report on compliance with political pluralism. According to ERC, PSM is not politically biased. Still, the reports continuously point out that news is focused on established political parties with parliamentary representation or institutions, underrepresenting other minority political actors. The guiding principle of journalistic coverage during the electoral period is editorial freedom and programming autonomy. At the same time, the media must observe balance and fairness in the treatment of news relating to the various candidates, and this principle is generally observed. Law nº 2/2005 regulates the financing of political parties and the spending during electoral campaigns but does not focus specifically on online platforms. Since political advertising has largely shifted online, the law is outdated. The budgets the parties present are very generic and may not allow for identifying specific expenditures on online platforms. Political advertising practices during electoral campaigns, including targeting political messages and disinformation, are not effectively scrutinized.

The indicator **State regulation of resources and support for the media sector** marks **13%** - low risk. In 2023, the result was 4%. The only indirect subsidy to support the media is postage payments (*porte pago*, called reading incentive since 2015) for local and regional press. Direct subsidies are available through competitive projects aimed at digitization, media literacy, professionalization, and content production. The CCDRs (Commissions for Coordination of Regional Development) manage the applications. Due to the reduced amounts of each incentive, and the fragmented logic of distribution, the projects are unable to cause any structural change. Law n.º 95/2015 establishes the rules for state institutional advertisement, and ERC publishes a monthly report on the awarding and distribution of campaigns. API (Portuguese Press Association) denounced that the state investment in publicity has been falling. Some public entities, such as universities and public banks, do not respect the state's institutional advertising rules, depriving local media of funds essential for their survival. Due to the continued deterioration of the legacy press's financial situation and the scarcity and immobility of current public policies, there have been successive calls for more significant state intervention in the media sector, particularly from journalists. Until now, there has been no political consensus on this issue or any practical outcomes.

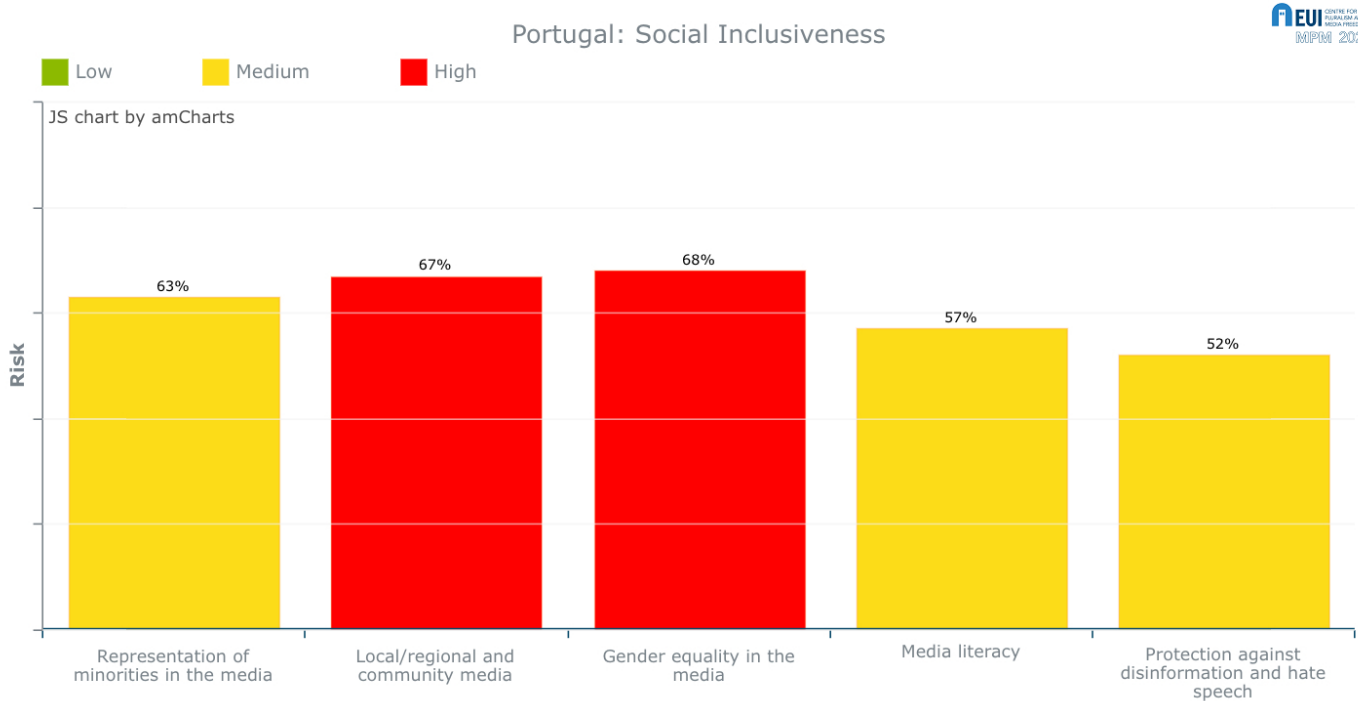
The indicator **Independence of PSM governance and funding** presents **21%** - low risk, the same as in 2023. The governance model of PSM (RTP and Lusa) remains stable, and PSM is perceived as credible and independent. Public service compliance obligations are set out in a Public Service Concession Contract, valid for 16 years in the case of RTP and 6 years in the case of Lusa. Both have strong editorial and ethical standards, but there are concerns related to the sustainability of the funding model. RTP is financed by CAV (Contribution to Audiovisual Media), a €2.85 fee paid on the electricity bill, which has not been updated, even if RTP has increasing obligations in terms of co-financing national audiovisual fiction and is operating in a multiplatform environment.

Focus on the digital environment

The risk assessment for **Political independence** in the digital environment lowered from 68% in 2023 to **64%** in 2024. Although the risk level is now rated as medium, the existing media regulation framework has not been adapted to the digital news media ecosystem. Portugal has not yet appointed a digital services coordinator to supervise the entities covered by the Digital Services Regulation. Political advertising through commercial advertising media on the Internet is prohibited during electoral campaigns. A recent academic report (Obercom, 2024) stresses how the extreme right party CHEGA is growing among young people thanks (partially) to aggressive political communication campaigns in TikTok and Instagram, using data-driven political micro-targeting. The lower risk is due to small progress related to the digital platforms' self-regulation. Meta Ad Library is more comprehensive and searchable. However, the level of accountability is fragile and entirely dependent on the commitments laid down in the Code of Practice on Online Disinformation. The platforms have not yet disclosed how they will restrict various strategies used by political campaigns on social networks, such as micro-segmentation of profiles.

3.4. Social Inclusiveness (61% - medium risk)

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



The **Social Inclusiveness** area is at medium-high risk, with **61%**, two points higher than the 2023 MPM report.

The indicator **Representation of minorities in the media** presents a medium-high risk (**63%**), four percentage points lower than last year's report. Minorities lack a fair representation, either in terms of access or proportionality of representation. The most recent Regulation Report published by the regulatory entity (ERC), concerning 2022, states a low level of programs that promote cultural diversity and minorities' interests in the main public broadcasting television channel and the two leading commercial TV media (SIC and TVI) (ERC, 2023a). This trend has also been confirmed in the last regulation reports. However, in 2023, migrants were given more voice in news coverage concerning housing, labor, and human rights issues. There were no relevant changes to the sub-indicator Media accessibility for people with disabilities, where the legal framework and policies have been well-established for over a decade. According to the Media Regulatory Body's Regulation Report regarding 2022 (ERC, 2023a), the main open-signal TV channels offer accessibility for people with hearing impairments and have generally respected their obligations concerning accessibility standards. All channels have also respected their obligations regarding audio description. However, the minimal accessibility standards in this scope are very low, and consequently, audio description was available in limited quantity in all channels.

The indicator **Local/regional and community media** is at high risk (**69%**), with a rise of 11 percentage points about the 2023 MPM Report. Of the 308 existing municipalities, 166 (54%) are considered as news deserts or semi-deserts, or at risk of becoming one (Jeronimo et al., 2022). Many local media have closed in the last few years, and many communities do not have journalistic information provided to them. There are state subsidies for regional media, but not by far enough to overcome local media companies' challenging

financial sustainability, which increases the risk of 'media capture' by local politicians. Local media tend to be seen as community-based media (or proximity media), but the concept of community media is not foreseen in Portugal's legal framework. Experts consider that the legal recognition of community media would facilitate the viability of already existing community media radio and online-based projects oriented toward social purposes (ERC, 2023b). The absence of a legal framework for community media also hinders the possibility of setting proper funding mechanisms and other kinds of support that would effectively safeguard their independence.

The indicator **Gender equality in the media** scores high risk (**68%**), rising four percentage points concerning the risk assessment found in last year's report. The mission of gender equality is explicit in several PSM strategic documents. However, the share of women in management boards and executive positions (either in private media companies or PSM) remains low in proportion to male leadership. There is no new data concerning the representation of men and women in news and current affairs broadcasting. The Media Regulatory Body's Regulation Report regarding 2021 (ERC, 2022a) reported a noticeable imbalance in gender representation concerning opinion makers, experts, and news actors, particularly in television. The same trend was identified in the Global Media Monitoring Project 2020 (published in 2021) regarding Portugal. The presence of women as opinion makers is still scarce on television. In 2023, women represented 24% of political opinion makers in television, 34% in radio broadcasting, and 19% in online media (Cardoso et al., 2024).

The indicator **Media literacy** is at medium risk (**57%**), four percentage points higher in comparison to the previous MPM report. In November 2023, the Council of Ministers approved a resolution defining the guidelines for a National Media Literacy Plan, with the aim of integrating media literacy in school curricula; however, its implementation remains uncertain due to the current unstable political context in Portugal (government's fall / legislative elections in March 2024). This indicator has not evolved significantly since last year's report. Media literacy initiatives within non-formal education are remarkably diverse, mainly targeting children and young people. Projects for vulnerable groups need better support for promoting long-term strategies.

The indicator **Protection against disinformation and hate speech** shows a medium risk (**52%**), two percentage points lower than the risk assessment reported in last year's evaluation. There is no new relevant data concerning disinformation trends. International disinformation trends, particularly related to immigration, still have little traction in Portugal, although there are some signs of future growth due to the rise of xenophobic and nationalist discourse in the country. Hate speech is legally defined in the Penal Code (article 240), but the public and/or online expression of a racist ideology, for instance, is not criminalized (ECRI, 2018). The preparation of a preliminary draft of a government bill to amend Article 240 was announced in 2021 but not yet implemented at the beginning of 2024.

Focus on the digital environment

Social Inclusiveness in the digital environment presents a score of **51%**, one point lower than last year's report.

According to Eurostat, 81% of the population has basic or above basic Information and data literacy skills.

There is no significant evolution regarding protection against disinformation. The “Portuguese letter of human rights in the digital age” (Carta Portuguesa de Direitos Humanos na Era Digital), issued by the Portuguese Parliament in May 2021, is still the only legislative initiative that can be characterized as part of a broader national strategy in this area. Nonetheless, there are several (and growing) initiatives to tackle disinformation and stimulate media literacy promoted by public entities. For example, the Directorate General for Education and Culture (Direção-Geral da Educação e Cultura) aims to tackle disinformation through media literacy, including partnerships with international research projects as is the case of IBERIFIER – Iberian Digital Media and Disinformation Observatory, the Portuguese and Spanish hub from EDMO – European Digital Media Observatory. IBERIFIER reports on disinformation campaigns and impacts and promotes media literacy initiatives for journalists, teachers, and students. Also, with the support of the Portuguese government, ALPMJ – Media Literacy and Journalism Association maintains a program to train teachers on media literacy. Other public entities, even if not directly addressing the disinformation issues, fund teaching/training projects related to media, media freedom, or freedom of speech.

Reliable statistics and systematic monitoring of online hate speech are still lacking, as stated in previous MPM reports. The National Plan to Combat Racism and Discrimination 2021-2025 (Conselho de Ministros, 2021) included measures such as promoting media literacy and developing accessible mechanisms for managing, recording, and reporting online hate speech and incitement to violence and violence, strengthening support for the production of more knowledge about the phenomena of propagation of hate speech and incitement to hatred and violence, or the creation of the Observatory on Racism and Xenophobia. This observatory was finally launched in March 2023, within a protocol established between the government and Nova School of Law. Besides hate speech monitoring, the work of this observatory will support policy-makers, researchers, and practitioners through the production of diagnoses and opinions on racism and discrimination, and practical tools to promote equality and non-discrimination; promote education, training, and awareness-raising on human rights and preventing and combating racial discrimination; and support civil society organizations. Recently, there has been funding for academic projects focusing on hate speech monitoring and prevention in Portugal (e.g., by FCT, Observatório La Caixa, and CERV). Moreover, the NGO Casa do Brasil has implemented reports and questionnaires on hate speech perceptions.

4. Conclusions

Several critical situations remain in the field of **Fundamental Protection**, as we have regularly pointed out in recent MPM reports. In summary, our main recommendations relate to improving practices and legislation, more particularly in the following cases:

- It is important to reverse the issue of criminalizing defamation, which remains a public crime in Portugal, even with the possibility of imprisonment. As we know, the European context remains critical in this regard (CMPF, 2019). The European Commission itself (EU, 2022) has taken a position on the matter, but nothing has changed so far in Portuguese legislation.
- Concerning the blocking or filtering of content and access to the Internet, whether by the state or by digital platforms, as a whole or to specific content and online services, in our view it would be justified to create a centralized database of all blocks, with full transparency and full explanation for each of the cases targeted for filtering or removal.
- When it comes to protecting whistleblowers, legislators ignore not only the recommendations of experts and civil society organizations, such as TI Portugal but also those of the European Commission itself. When transposing the EU Whistleblowing Directive into national law, Portugal should have taken the opportunity to give whistleblowers the chance to make reports directly to the authorities. Instead, in Portugal, only people who report or reveal infringements based on information obtained in the course of their professional activity are protected by law.
- Journalism experiences increasing concerns. Journalists' working conditions have worsened considerably, with frequent payment irregularities and job insecurity. The public authorities should, therefore, pay particular attention in these regards, including the need for new public support for the news media sector, closer monitoring of editorial independence and respect for journalists' professional standards, as well as the effectiveness of anti-SLAPP legislation.
- Regarding regulation, a general improvement of the regulatory model is required at various levels: reducing the dispersion of entities involved in sector regulation (in addition to the ERC, ANACOM, AdC, and IGAC are also involved). There is also a need for greater transparency and political-institutional legitimacy to how the boards of the regulatory bodies are appointed and redefine and improve the funding model of what is, for all intents and purposes, still "the" media regulator - the ERC.

There are significant risks in the **Market Plurality** area of the Portuguese media landscape. Our main recommendations in this area are the following:

- Updating the regulatory framework as soon as possible. A new media law must consider both traditional and digital players and focus on preventing excessive media concentration.
- The Directive (EU) 2019/790 has finally been transposed to the Portuguese Legislation, but some implementation errors must be addressed.
- From an economic perspective, the impact of the high inflation and costs poses a threat to local and regional media. New and creative public policies must be implemented.

- In the context of the recent crisis of Global Media Group, general transparency practices must be strengthened. Potential conflicts of interest from new owners jeopardizing the editorial freedom of the media organizations must be prevented.

Political Independence is threatened by job precarity, low wages, depleted newsrooms, and uncreative work routines undermining journalism's ability to scrutinize political and financial powers through investigative reporting. We recommend the following measures:

- The State should provide a sustainable package of public support to the media, targeting the most vulnerable sectors, namely regional and local media;
- The future of Lusa should be part of a well-structured public policy to support media, as the news agency provides a unique public service and serves local communities in the context of growing news deserts;
- The media policy should align with and implement the European Democracy Action Plan on the Media, including the proposal for a Regulation on the Transparency and Targeting of Political Propaganda, as well as the legislative proposal to protect press freedom, the Media Freedom Act.

Considering **Social Inclusiveness**, and particularly the high risk of the indicators **Local/regional and community media** and **Gender equality in the media**, we therefore recommend:

- The protection and promotion of the economic sustainability of local journalism to prevent the growth of news deserts and the legal recognition of community media, aiming to foster its viability and independence;
- The development of concrete and systematic public policies regarding gender equality and representation of minorities in the media;
- The fostering of media literacy initiatives targeted at vulnerable groups and the effective implementation of a national media literacy plan;
- The promotion of a national strategy to foster cooperation between different stakeholders to tackle information disorders and prevent online hate speech.

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Interviews (Social Inclusiveness)

- Ana Pinto Martinho and Miguel Crespo, researchers at MediaLab ISCTE-IUL and experts on disinformation.
- Carlos Duarte, assistant professor at the Faculdade de Ciências da Universidade de Lisboa and expert on accessibility.
- Isabel Férin, associate professor at Universidade de Coimbra and expert on the relationship between media and ethnic minorities.
- Maria José Brites, associate professor at Universidade Lusófona and expert on media literacy.
- Pedro Jerónimo, researcher at LABCOM/UBI and member of the expert committee concerning direct subsidies to regional media outlets.

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 CT Leader
<i>Francisco Rui</i>	<i>Cádima</i>	<i>Coordinator of ICNOVA Diversity and Pluralism Observatory</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	X
<i>Carla</i>	<i>Baptista</i>	<i>Researcher; Professor at DCC-NOVA FCSH</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	
<i>Luís</i>	<i>Oliveira Martins</i>	<i>Researcher; Professor and Coordinator of the Communication Sciences Department (NOVA FCSH)</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	
<i>Marisa</i>	<i>Torres da Silva</i>	<i>Researcher; Professor at DCC-NOVA FCSH</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	
<i>Patrícia</i>	<i>Abreu</i>	<i>PhD Student (ICNOVA/DCC-NOVA FCSH)</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</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>Elsa</i>	<i>Costa e Silva</i>	<i>Researcher; Professor at UMinho</i>	<i>CECS - Communication and Society Research Centre</i>
<i>Catarina</i>	<i>Burnay</i>	<i>Researcher; Professor at UCP</i>	<i>CECC - Research Centre for Communication and Culture</i>
<i>Pedro</i>	<i>Braumann</i>	<i>Director of the Museum Center and Public Service Support</i>	<i>RTP</i>
<i>Carla</i>	<i>Martins</i>	<i>Member of ERC Regulatory Council</i>	<i>ERC</i>
<i>Sofia</i>	<i>Branco</i>	<i>Internship and professional training coordinator</i>	<i>LUSA</i>

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