

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2022

Country report: Malta

Louiselle Vassallo, Faculty of Media and Knowledge Sciences (MAKS), University of Malta

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 2022. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. 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, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.

In Malta the CMPF partnered with Louiselle Vassallo (Faculty of Media and Knowledge Sciences (MAKS), University of Malta), 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. For the MPM 2023, no major changes were made to the questionnaire, except for the Indicators Transparency of Media Ownership, Plurality in Digital Markets and Editorial Independence from Commercial and Owners Influence (Market Plurality area), and Protection Against Disinformation and Hate Speech (Social Inclusiveness area). 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/>.

In the Market Plurality area, the names of three Indicators have changed. The former indicator on "News Media Concentration" is now named "Plurality of Media Providers"; "Online Platforms and Competition Enforcement" has been renamed as "Plurality in Digital Markets"; "Commercial & Owners' Influence Over Editorial Content" has been renamed as "Editorial Independence from Commercial and Owner Influence".

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, MPM2023 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 MPM2023, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

- **Country overview:** Malta is a Mediterranean island state and one of the smallest archipelagos in the world, with an overall landmass area of 316 km² (122 sq. miles). The islands are situated 80 km south of Sicily and 284 km east of Tunisia. Only the three largest islands - Malta, Gozo and Comino - are inhabited, and with a population of over 519,000 and a population density of 1,649 persons per square kilometre, Malta retains the top spot as the most densely populated EU member state. (NSO, 2022, p.25, p. 27) Similar to the age structure prevalent in the EU, Malta has an ageing population, and the old-age-dependency-ratio is expected to continue rising steadily in the coming years. (Trading Economics, 2023).
- **Languages:** The country's two official languages are Maltese, which is also the national language, and English, due to a strong British legacy as a consequence of Malta being a colony of the United Kingdom for more than 150 years, until 1964. Maltese is a Semitic language, and its vocabulary has substantial borrowing from Sicilian and Italian, a limited amount of French, and, more recently, and increasingly, English. Italian, which used to be the official language of Malta until 1934, is also fluently spoken by a substantial amount of people. This is mainly because of the widespread consumption of Italian television channels (such as Mediaset and RAI). Maltese sign language was officially recognised by the Parliament of Malta in 2016 through the [Maltese Sign Language Recognition Act](#) (CAP. 556).
- **Minorities:** There are no legally recognised minorities in Malta, even if, as documented in the latest [census](#), conducted by the National Statistics Office, more than one in five residents is foreign, an increase of more than five times in the share of foreigners over a span of 10 years. Italians make up the largest group of non-Maltese citizens (12%), followed by British nationals (9.2%), whilst the largest shares of non-European citizens are Indian (16.2%) and Filipinos (15.8%). Other nationalities include Serbian, Bulgarian, Libyan, Nepalese, Albanian and Syrian, as well citizens from other EU member states and other European countries. (National Statistics Office, p. 115, p. 124). EU and European migrants relocate to Malta, primarily, for employment. Malta also has a substantial African community. In view of its geographical location, the country sees an influx of asylum seekers arriving by sea, although amounts have decreased over the past few years. The number of sea arrivals in Malta in 2022 was 444, almost half of the arrivals in 2021 (832), and less than one fifth of arrivals in 2020 (2,281) (UNHCR, 2022). This decrease in numbers is possibly related to the fact that the Maltese government has, in recent years, been accused of ignoring alarms and has “consolidated its policy of reducing to the absolute minimum its rescue operations.” (ANSA, 2023) More recently, human rights NGO Aditus published their submissions for the latest [Asylum Information Database report](#) (AIDA), noting that the top three nationality groups of applicants in 2022 (44% of all applicants) were persons fleeing armed conflict or undemocratic regimes, namely Syrians (25%), Eritreans (10%) and Ukrainians (9%). Whilst positive improvements were noted in relation to the reception of unaccompanied minors, the report highlights that all asylum seekers rescued at sea are still detained automatically for several weeks upon arrival, and that no entity is permitted to visit them, citing access to detention as an issue for all actors in the field (Aditus, 2023). According to the Standard Eurobarometer 98 data set, after the the cost of living (61%) and crime (26%), immigration is perceived to be a relatively important issue in Malta by 15% of the population (European Commission, 2023), registering a slight increase when compared to the 12% of the Standard Eurobarometer 97 (European Commission, 2022). Malta has made LGBTIQ rights equal at a constitutional level (Art. 32 and Art. 45) and, as stated by the Malta Gay Rights Movement (MGRM), “despite Malta’s socio-religious context, the stigma surrounding LGBTIQ

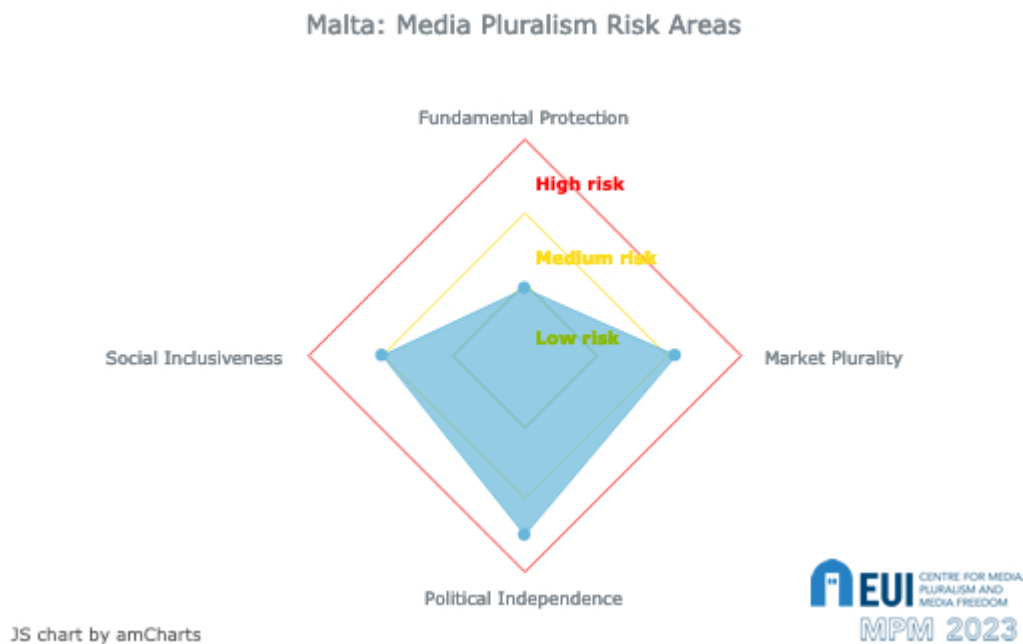
issues has been effectively dismantled.” (Malta Gay Rights Movement, 2023) Malta continues to enjoy the top spot in the [ILGA-Europe Rainbow Index 2022](#) LINK, with a 92% equality and respect for human rights rating. (Euronews, 2022). ILGA-Europe is an umbrella organisation for 600 rights advocacy groups.

- **Economic situation:** Over the past few years, Malta has enjoyed a strong economy. In 2022, real GDP growth is estimated to have reached 6.8%, higher than projected in autumn, and the economy showed strong growth in both private and public consumption (Central Bank of Malta, 2023). In 2022, HICP inflation reached 6.1%, in spite of the government’s intervention at retaining energy prices at the 2020 level. Maltese authorities declared energy inflation will continue to be limited during 2023, although inflation in 2023 is set to remain elevated at 4.3%, due to the price increases of food, transport and imported goods. (European Commission, 2023b). The unemployment rate for the fourth quarter of 2022 stood at 2.9% (NSO, 2023b) measuring a 0.9% increase when compared to the same period in 2021 (NSO, 2022b). According to the Standard Eurobarometer 98, 61% of the Maltese people believe that rising prices, inflation and cost of living were amongst the most important issues being faced by the country, which is 8% higher than the European average (European Commission, 2023a).
- **Political situation:** Malta is a parliamentary democracy, and the two major political parties, the *Partit Laburista* (PL) and the *Partit Nazzjonalista* (PN) are the overriding protagonists of the political landscape. This considered, since the assassination of investigative journalist Daphne Caruana Galizia in October 2017, Malta’s civil society has become a protagonist of the political landscape, particularly on issues related to good governance and the rule of law, and environmental issues, with two NGOs in particular, [Repubblika](#) and [Moviment Graffiti](#), emerging as leaders in the political narrative. Whilst there are no significant restrictions to political party formation, smaller parties face disadvantages when competing against the PL and the PN since the latter have better access to donations and media platforms, and a strong tradition, since 1964, of alternated power, a process which is culturally ingrained. The PL has governed since 2013, winning three elections (2013, 2017 and 2022), each by a landslide victory. Following revelations concerning, amongst others, the Panama Papers, the Electrogas Power Station and Montenegro Wind-farm deals, as well as the sale by government of three state hospitals to third parties, that was defined as fraudulent and annulled in court judgement (Opposition Leader Adrian Delia vs Prime Minister Joseph Muscat et al., 133/2018 FDP), as well as institutions dragging their feet in prosecuting politically exposed persons implicated in money laundering activities and cases of corruption, Maltese anticorruption efforts are seen to be weak by international institutions.
- **Media market:** The most particular aspect of the Maltese media landscape is the ownership of multiple platforms by the two main political parties (PL and PN), who together with public service media (PSM) and a number of independently owned media outlets, form part of an oversaturated media market, where they all need to compete over limited advertising budgets. Other media outlets include those owned by or affiliated to the Catholic Church (2 radio stations, a news website and a weekly paper), the General Workers Union (a daily and a weekly newspaper and a news website) and the University of Malta (one radio station). While the political parties and the PSM dominate the TV sector, the commercial media dominate the radio sector and the newspaper and magazine sector. In the digital sector, organisations linked to legacy media outlets have a stronger presence than native digital media organisations. The [Daphne Caruana Galizia Inquiry report](#), published in July 2021, made a number of recommendations for a comprehensive media reform that would establish press freedom as the fourth pillar of democracy. At the time of writing, none of the points raised in the report have been implemented. A [Committee of Experts on Media](#) was set up by the Prime Minister in January 2022, and

although the board submitted their report within the six months stipulated, the process is still ongoing, following the withdrawal of a proposed law by the Minister for Justice towards the end of 2022, in view of key recommendations that had been completely disregarded (Meilak, 2022b). The Committee has had its term extended so as consult with stakeholders. International media freedom organisations have written to the Maltese Prime Minister, urging his government to implement the necessary recommendations without delay, as well as strengthen any proposed legislation in line with international standards. (European Federation of Journalists, 2023).

- **Regulatory environment:** The Rule of Law in Malta continues to be a primary a topic of debate and international scrutiny. The Government's control over the public sector has been described as "an environment where impunity persists, and where persons are believed to be part of a political network and hence protected." (Borg & Comodini Cachia, p. 342) Activists for good governance have been critical of the inaction of a number of institutions, that include the Attorney General's Office and the Malta Police Force, for failing to progress on investigations or arraignments of high-profile politicians and persons with political connections. Additionally, it is a given that most court proceedings are prolonged affairs, that take years to conclude. Whilst acknowledging progress made in the in the ongoing judicial proceedings on the murder of Daphne Caruana Galizia, a [European Parliament resolution](#) on the rule of law in Malta, passed on October 20, 2022, noted that full justice had not yet been achieved, as well as highlighted the lack of progress on the Inquiry report recommendations. It noted that, in spite of efforts made by the Financial Intelligence Analysis Unit (FIAU), it was essential that high-profile economic crimes were prosecuted rigorously, and "alarmed by the institutional failure of law enforcement and justice in Malta," as well as" highly concerned about the recent revelations of repeated inaction on European Arrest Warrants against those connected with high political officials." The resolution also stressed on "the importance of institutional independence for the proper functioning of the rule of law." (European Parliament, 2022, n.p.)

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



The overall result for the Media Pluralism Monitor 2023 for Malta scores an overall medium risk, in line with the previous three MPM reports, with over half of the individual indicators point to high or very high risk levels.

The average risk level of the **Fundamental Protection** area is low (31%), and 1 percentage point lower than last year's score. This is in line with previous reports, mainly in view of the fact that a number of legal provisions are embedded in the Constitution and the country's legal framework. Adequate protection of journalists has been a point of discussion throughout 2022, especially since the recommendations made by the [Committee of Experts on Media](#) appointed by the Prime Minister in January of the same year are yet to be implemented (Martin, 2022b). The Committee had the task of proposing measures that would examine draft legislative amendments prepared by Government^[1], and which were to be based on consultations carried out with relevant stakeholders. The fact that Malta continues to lack a comprehensive media authority is also problematic in this context, as the necessary structures that would assist in the implementation of the proposed media reform are underdeveloped, particularly in relation to print and online media^[2]. Additionally, journalists continue to report facing difficulties when filing Freedom of Information requests. The Shift News alone reported having to file court proceedings on [40 freedom of information requests](#) (Reporters Without Borders, 2022b), which were contested by various ministries and government entities. When it comes to accessibility, the whole country enjoys broadband coverage and adequate internet speed, whilst the universal reach for traditional media continues to be guaranteed.

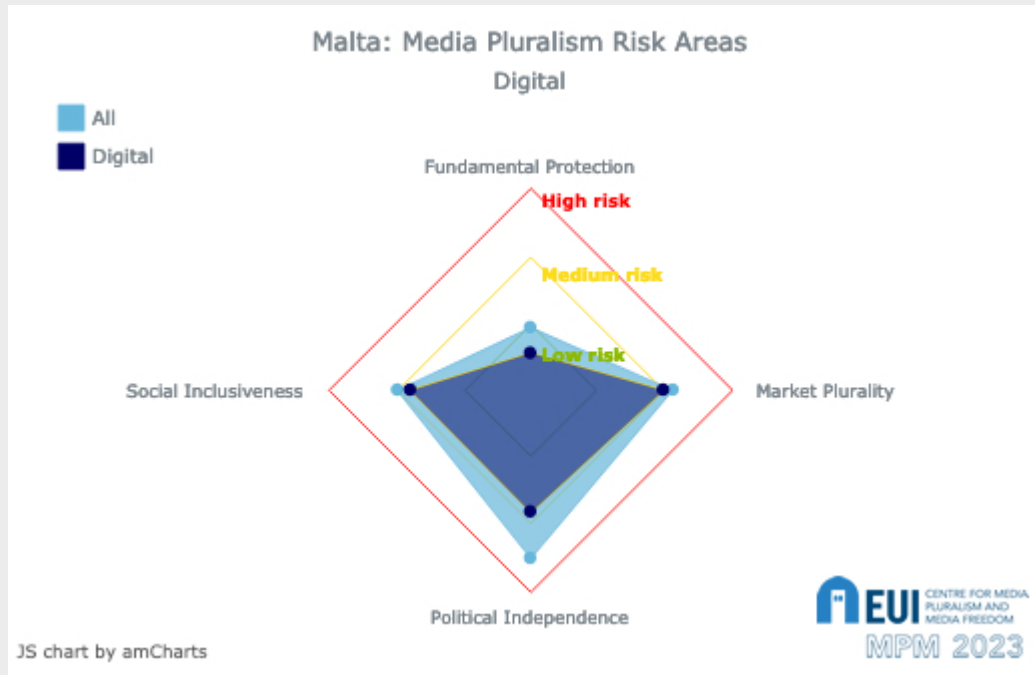
In the area of **Market Plurality**, Malta's overall risk level is high (70%), as in the three previous MPM reports, and an identical score to last year's. Three indicators score high risk: Plurality of Media Providers (93%), Plurality in Digital Markets (86%), and Editorial Independence from Commercial and Owners Influence (69%). Although media ownership information is, generally, publicly available, Malta's media landscape still presents a problematic scenario since the two main political parties continue to own and operate multiple media outlets^[3], consequently continuing to have an impact on the editorial line of their output, in view of their evident political agenda. One must also consider the data gap in terms of both circulation and online traffic, as well as revenues generated by the media industry, where practically no

information is publicly available, and the media arms of the two main political parties failing to file audited accounts in over 10 years (Bonnici, 2022). The only [set of data](#) that is accessible pertains to broadcast, and even this is limited in its scope. There is also no regular, transparently distributed financial assistance to media outlets, with the exception of financial support distributed during the pandemic, which was not without its controversies^[4], and a one-off fund of €500,000, that was announced in May 2022, and is aimed at supporting newspaper publishers, in view of a substantial increase in the price of paper (Vella, M., 2022a).

The overall score for **Political Independence** remains in the high risk band, increasing to 83%. Four indicators score high risk: Political Independence of Media (94%), Editorial Autonomy (88%), Audio Visual Media, Online Platforms and Elections (79%), and the independence of Public Service Media (97%). This is a direct result of fact that political party-owned media continue to form a substantial part of the Maltese media landscape, and the influence that this type of ownership has on content and regulation, as well as the continued criticism on the Public Service Media, in view of their financial dependence on the state, as well as the manner in which key appointments are made by the minister responsible. The latter are defined, by the opposition and by civil society, as being politically motivated, and selected on the basis that they will ensure the censorship of government critics. Additionally, PSM's Editorial Board annual reports, which are meant to be assure that content is impartial and independent, have not been published since 2016. The minister is also refusing to publish details regarding who the members of the PSM editorial board are, when their term ends, as well as details on their remuneration (Galtes, 2023).

The score for **Social Inclusiveness** remains in the medium risk band (66%), towards the higher end, as was the case for previous reports, and 4 percentage points higher than the MPM2022 (62%). Three indicators are in the high risk band: Representation of Minorities in the Media (92%), Gender Equality in the Media (85%) and Media Literacy (80%), whilst Protection against Disinformation and Hate Speech scores a medium risk at the higher end of this spectrum (65%) and Local/Regional and Community Media scores a low 3%, in view of the country's size and population. According to the latest [census](#) conducted by the National Statistics Office, over 20% of the Maltese population is made up of foreign nationals (NSO, 2022, p.30), 5.2% of whom are Asian (NSO, 2023). Yet, minority groups continue to be largely invisible when it comes to media representation. Added to this, Malta has an immeasurable lack of data collection, which in turn creates an information deficit that has an impact on policy, or rather, the lack of it. This can also be said of gender representation, with a singular local study conducted by the Broadcasting Authority, published in 2020. Furthermore, the Media Literacy Development Board^[5], set up by government in January 2021 has, to date, failed to publish any working documents or strategy that would ensure the development of literacy skills. This means that Malta is still without a comprehensive Media Literacy Policy.

Focus on the digital environment



Fundamental Protection

When compared to the overall MPM scores for **Fundamental Protection**, the digital variables score almost 13 percentage points less at 18.3%, which also places them in the low risk band. There is no evidence of violation of FoE by filtering, monitoring, blocking and/or removing online content in an arbitrary way. On the down-side, with regards to online safety, there are regular, anecdotal reports of online threats made towards journalists, however it is difficult to quantify these attacks since no data is collected on a national level. Troll armies are regularly unleashed upon government critics, including activists and journalists. The Maltese islands have almost 100% broadband coverage.

Market Plurality

The digital score for **Market Plurality** is 65.5%, just under 5 percentage points less than the overall score for the area, placing them in the medium risk band. The ownership of digital native media is publicly accessible and the UBOs of [The Shift News](#), [Lovin Malta](#), [Malta Daily](#) and [Side Street](#) are all visible on the Malta Business Registry's platform, whilst newcomer [Bonqu](#) is owned and operated by one person. There is no dedicated, reliable data available with regards to the market share of online media. The only available figures, published by the Broadcasting Authority's [Audience Assessment](#) data, refer to "preferred source of news", although the total number of individual responses for this question was too small to be considered as representative. As with other sectors, no data is publicly available with regards to the market share of the leading players in the online advertising sector, and there is no publicly available evidence of financial agreements between digital intermediaries and media providers. Additionally, a data gap also exists with regards to revenues of digital native media and, to date, there has been no public fund that has been designed to give support to the online media.

Political Independence

Compared to the overall MPM scores for **Political Independence**, the digital variables score a substantial 23 percentage points less at 60%, which places them in the medium risk band. The two main digital native platforms are [The Shift News](#), and [Lovin Malta](#), whilst other platforms with less

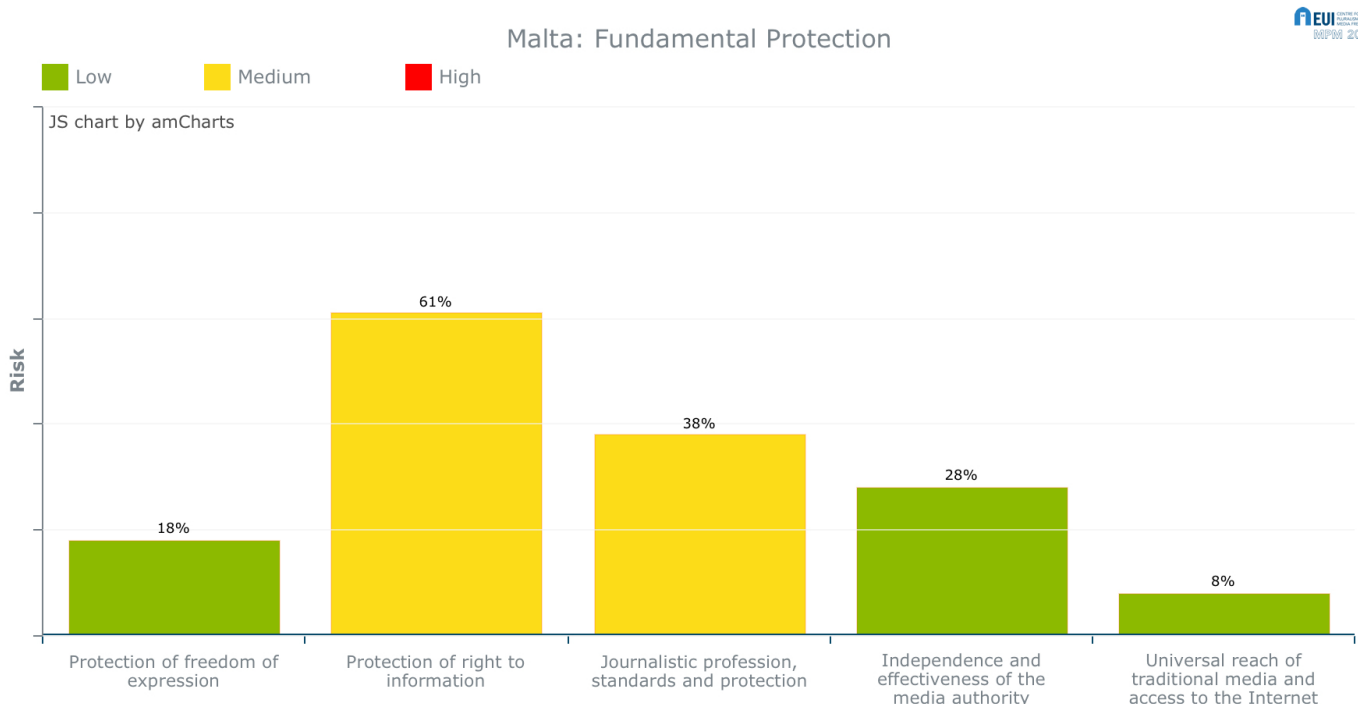
reach include [Malta Daily](#), and [Side Street](#). They are all independently owned and are not evidently affiliated to any Political parties. The digital landscape also has a number of bloggers, amongst them activist and author [Manuel Delia](#) and author and historian [Mark Camilleri](#). Other prominent online news media are all either affiliated with legacy media platforms, or Political parties. 2022 was a general election year in Malta and saw increased political advertising activity online, substantial for a country the size of Malta (Vella, L., 2022), coupled with a lack of transparency regarding the election campaign finances of the two major Political parties and their candidates. (Spiteri, 2022) There are no legal provisions that stipulate that funding adequately covers the online public service missions of the PSM without distorting competition with private media actors. Furthermore, government continues to have significant and direct influence on PSM structures and content, which extends to the digital output.

Social Inclusiveness

At 59% medium risk, the digital variables for **Social Inclusiveness** score just over 7 percentage points less than the overall score. Malta not having a Media Literacy Policy in place, and there being no effort on a national scale to address the issue continues to pose a risk, in spite of the fact it is estimated that 61% of the population has basic or above basic overall digital skills, which alone are not sufficient when navigating through the digital sphere. Additionally, there is no national strategy designed to tackle disinformation, and although there have been some efforts with regards to hate speech, there is a lack of reporting as to how effective or efficient this is.

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 level of the **Fundamental Protection** area is low (31%), and 1 percentage point lower than the previous MPM report.

The **Protection of Freedom of Expression** indicator reaches a low risk score at 18%, down by 4 percentage points from the MPM2022.

The decrease in risk possibly in view of the fact that, in general, individuals are free to express their views publicly, apart from the fact that there has been an increasing number of investigative journalists, working for the independent media who, in the wake of the assassination of Daphne Caruana Galizia, followed up on her stories and uncovered new ones. Furthermore, the publication of the [Daphne Caruana Galizia Inquiry Report](#) further strengthened the position of journalists, in that their demands were legitimised and, although not quite at the pace desired, a media reform law is in the pipeline, even if the draft media reform bill published by government last October were far from adequate or acceptable. Freedom of expression is embedded in Article 41 of the [Maltese Constitution](#) (Article 41), meaning that individuals are free to express their views publicly, and that “no person shall be hindered in the enjoyment of his freedom of expression, including freedom to hold opinions without interference, freedom to receive ideas and information without interference, freedom to communicate ideas and information without interference (whether the communication be to the public generally or to any person or class of persons) and freedom from interference with his correspondence.” (p. 18) Article 41 does not refer to any particular medium, so, in practice, freedom of expression is guaranteed for all media, including new media. The only provisions that are medium-specific are Article 41(3) and 41(4) of the Constitution, and which concern print media. Although the Maltese legal framework does not include specific legal remedies for violations of citizens' FoE, Malta has an independent judiciary and the courts have the power to interpret and apply the

law, including the protection of freedom of expression. Thus, citizens may resort to the ordinary legal remedies of rights' protection, under both civil and criminal law, which means that they have the right to take legal action in the courts, including the European Court of Human Rights (eg. [Falzon vs Malta](#), 2018; [Unifaun Theatre Productions Limited and Others vs Malta](#), 2018). In 2018, the [Media and Defamation Act](#) (CAP. 579) came into force, a new law that superseded the Press Act (in force since the 1970s). Apart from generally regulating the news media (the press), through the new law, criminal libel was abolished and the multiplicity of libel lawsuits (in Malta) on the same journalistic report was prohibited. Additionally, once the law was passed, all pending criminal libel cases were considered no longer valid and will be immediately dismissed. On the anniversary of the publication of the [Daphne Caruana Galizia Inquiry Report](#) (2021), which highlighted a number of issues surrounding FoE and Freedom of the Press, and which suggested that the Constitution be amended to recognise free journalism as one of the pillars of a democratic society (Mallia, Said Pullicino & Lofaro, 2021), the NGO Reporters Without Borders (RSF) noted that "changes introduced so far are token gestures, rather than the effective and systemic reforms urgently needed." (RSF, 2022a, n.p.) In view of this, journalists and activists alike still face threats and intimidation, and find themselves targets of hate campaigns, at times instigated by individuals working for the media of the party in government, and who have an extensive audience reach. ([Balzan](#), 2023, n.p.; [Delia](#), 2023, n.p.; [De Gaetano](#), 2022, n.p.) The updated [Protection of the Whistleblower Act](#) (Cap.527, 2021) was not without its critics, and in a paper published by NGO Repubblika in reaction to the proposed amendments, issues cited include lack of stakeholder consultation, the sudden publication of a draft law just one month before the deadline, that the law would only protect individuals who report to specified formal whistleblowing units, and that "the new units to handle disclosure do not have any of the guarantees for independent channels free from conflicts of interest with access to organisational leadership necessary for credibility, and safety for whistleblowers", also claiming that identified loopholes would undermine trust and confidence in the protection, and that people were more likely to choose silence or suffer the consequences for speaking up. (Repubblika, 2021b, n.p.)

The **Protection of Right to Information** indicator scores a medium risk at 61%, at the higher end of this spectrum, and identical to the MPM2022 score.

The [Freedom of Information Act](#) (CAP. 496) was transposed into the Maltese legal system in 2012, and should, in theory, guarantee access to information all residents in Malta, who have been so for a period of at least five years, and who are Maltese or European Union citizens, or citizens of any other state wherein a treaty between that state and the European Union gives that person the right to be treated in Malta in the same manner as citizens of member states of the European Union (p.3). Yet Freedom of Information requests are repeatedly denied by the state, resulting in journalists having to initiate legal proceedings in order to have access to the information requested. International press freedom NGOs have expressed their concern over the challenges that Maltese newsrooms face when attempting to access public information through the Freedom of Information Act (ECMPF, 2022). In August 2022, The Shift News alone was facing 40 freedom of information (FOI) lawsuits brought by 40 government entities in Malta. This was in view of Malta's Data Protection Commissioner ruling in favour of 40 FOI requests filed by the newsroom, and for which identical appeals against the Commissioner's decisions were lodged by each of the government entities concerned. And even when the Appeals Tribunal ruled in favour of The Shift News and the Data Protection Commissioner, a second round of appeals was pursued. Apart from the financial burden that these cases place on the applicants, and for which The Shift News were forced to launch a crowdfunding campaign, such tactics are designed to exhaust newsrooms preventing them from pursuing stories of public interest. (Reporters Without Borders, 2022b) More recently, a statement issued by the Institute of Maltese Journalists (IGM), "called on the government to address other issues that are seriously undermining the media in Malta. Primary among them is the Freedom of Information Act which is weak, abused by the public

authorities and in dire need of a total overhaul.” (Calleja, 2023, n.p.) The [Protection of the Whistleblower Act](#) (CAP. 527) was implemented in 2013, to make provision for procedures that provide protection to persons who report improper practices and wrongdoings at the workplace, in both the private sector and the public administration. At the end of 2021, the law was revised so as to transpose the requirements of the EU Directive 2019/1937 on the protection of persons who report breaches of union law. Before the 2021 amendments, the Whistleblower Act applied only to government ministries and private organisations with a minimum of 250 employees, whose balance sheet exceeded €43 million, and with an annual turnover exceeding €50 million. Today, entities with a minimum of 50 employees fall within the scope of the law, and are required to incorporate internal reporting channels for the protection of whistleblowers reporting improper practices at their workplace. The new act also set timeframes for dealing with internal disclosures and the definition of employee was extended to include shareholders, persons belonging to the administrative, management or supervisory body of an undertaking, non-executive members, and paid or unpaid trainees. (Attard & Bonnici, 2021)

The **Journalistic Profession, Standards and Protection** indicator scores a medium risk at 38%, identical to the MPM2022 result.

Whilst there are no legal obstacles which prevent a person from working as a journalist in Malta, and the protection of sources is explicitly recognised by the law in Article 22 of the [Media and Defamation Act](#), the journalistic profession is still lacking “far-reaching reforms needed to strengthen the protection of journalists”, as well as a need “to address the lack of trust in the media in Malta”, as highlighted by Council of Europe Commissioner for Human Rights, Dunja Mijatović in a [report](#) published in January 2022 (p. 12). In a follow up [letter](#) sent to Prime Minister Robert Abela in September 2022, the Commissioner enquired on developments, if any, on measures aimed at strengthening the protection of journalists, whilst expressing concern that the working process of the [committee of experts](#) tasked to provide advice on changes to the media sector in Malta lacked transparency. In compiling its recommendations, the committee had not consulted with civil society, media practitioners or journalists, nor Daphne Caruana Galizia’s family. (Article 19, 2022) Added to this, although the Prime Minister pledged to publish the committee’s report within 10 days of its submission, he declined to do so. (Delia, J., 2022) A scanned copy of the report was eventually made available by the committee, some 3 months after submission, after the government tabled legal amendments that excluded the most crucial proposals. (Meilak, 2022) The draft legislation was, consequently, withdrawn and the committee had their term extended so as to be given more time to consult with relevant stakeholders, resulting in further delays in the media reform, as recommended by the [Daphne Caruana Galizia Inquiry report](#) in July 2021. In the latest RSF World Press Freedom Index [Malta fact file](#), Malta’s ranking dropped by 6 points, ranking 84th out of 180 countries. Issues highlighted include, amongst others, the Malta government’s reluctance in implementing media reforms, journalists having to navigate through a highly polarised environment in view of the strong influence of political parties, regular refusal of FOI requests, lack of access to politicians to journalists deemed “hostile”, and abuse incited towards journalists covering issues like migration and abortion. (Reporters Without Borders, 2023) Maltese journalists do not enjoy the protection of a formal union that seeks to protect their rights, since the IGM (Institute of Maltese Journalists) is an association. There are plans, however, for the Institute to become a trade union (Vella, N. 2021, p. 40), although, since all the committee members are volunteers, with most of them handling a full-time job in a newsroom, this process could take time, also since members are currently focusing their efforts at ensuring that the upcoming media reform includes essential proposals that were, initially, left out of the draft law proposed at the end of 2022, and which had to be withdrawn.

The **Independence and the Effectiveness of the Media Authority** indicator scores a low risk at 28%, identical to the MPM2022 score.

The [Broadcasting Authority](#) (BA) is still the only entity that monitors the media in Malta, regulating radio and television broadcasting, as well as some aspects, albeit limited, of online audio-visual publication, meaning that there are gaps in the regulatory framework. Whilst the BA has clearly defined responsibilities at law by means of the [Broadcasting Act](#) (Cap. 350), and is generally transparent about its activities, the very nature of its make-up, in terms of board appointees, is problematic. Appointment procedures are followed, but they are intrinsically linked to political influence, since all five members of the board of directors are political appointees, selected by the two main political parties^[6]. Civil society and other constituted bodies are not consulted or involved in the process. Added to this, since the two main political parties own media platforms, the general interpretation of the law by the BA is that the message of one balances out the message of the other, thus leading them to focus, instead, on public service media. This had been highlighted in the [Daphne Caruana Galizia Inquiry report](#), and described as a misinterpretation of the concept of impartiality. (Mallia, Said Pullicino & Lofaro, 2021, p.441) And, even if the BA's main focus is on public service media (PSM), this is not without controversy. In July 2022, a judge ruled that the Broadcasting Authority had “failed to ensure impartiality and protection against discrimination” in a case^[7] filed by the Opposition claiming its rights were breached by the public broadcaster's political bias. (Brincat, 2022)

The fifth indicator in this area, **Universal Reach of Traditional Media and Access to the Internet**, scores a low risk at 8%, which is the same result obtained for the MPM2022.

Malta's geographical size is an advantage with regards to coverage since its small land area means that, practically, all of the inhabited islands have a TV and radio signal. Collectively, all service providers cover the whole country. Added to this, the [Malta Communications Authority](#) (MCA) employs effective communications regulation and conducts regular market monitoring exercises, “in order to safeguard end-users and achieve maximum benefits, while laying down the path for continual growth and innovation within a secure environment.” (MCA, 2022, p. 21)

Focus on the digital environment

When compared to the overall MPM scores for **Fundamental Protection** (31%), the digital variables score almost 13 percentage points less at 18.3%, which also places them in the low risk band.

Protection of freedom of expression

There is no evidence of violation of FoE by filtering, monitoring, blocking and/or removing online content in an arbitrary way. Monitoring and data harvesting might be taking place, in relation to intelligence activities and security operations, but there is no available data in this regard. At present, Malta has no specific internet content blocking or filtering laws, and the absolute majority of laws in Malta, including criminal and civil laws, are, to a large extent, technology neutral and, thus, can be interpreted to include related activities. After the war broke out in Ukraine, audio-visual service providers blocked the content of Russian TV stations that were part of their list.

Journalistic profession, standards and protection

Troll armies are regularly unleashed upon government critics, including journalists, as articulated by blogger Manuel Delia in his post entitled [Mob Rule](#) (2023). What The Shift News editor [wrote](#) in August 2021 is still relevant: "We've all been the victims of lies propagated by those who prefer the truth to remain hidden. The cyber war being waged against government critics over the past week is just one aspect of the way Malta's politicians, activists and political supporters use deceit and fabrication to destroy those they wish to silence." (Muscat, 2021) Worryingly, Malta had allowed Anatoly Hurgin, who is indelibly linked to the NSO Group and the development of its Pegasus spyware, to [acquire Maltese citizenship](#) through its passports-for-cash programme, although no specific reports are linked directly to Malta. (The Shift Team, 2022a) There is no data pertaining to Malta in relation to online threats and attacks against women journalists. However, there are still anecdotal reports by women journalists, which are also visible on social media platforms.

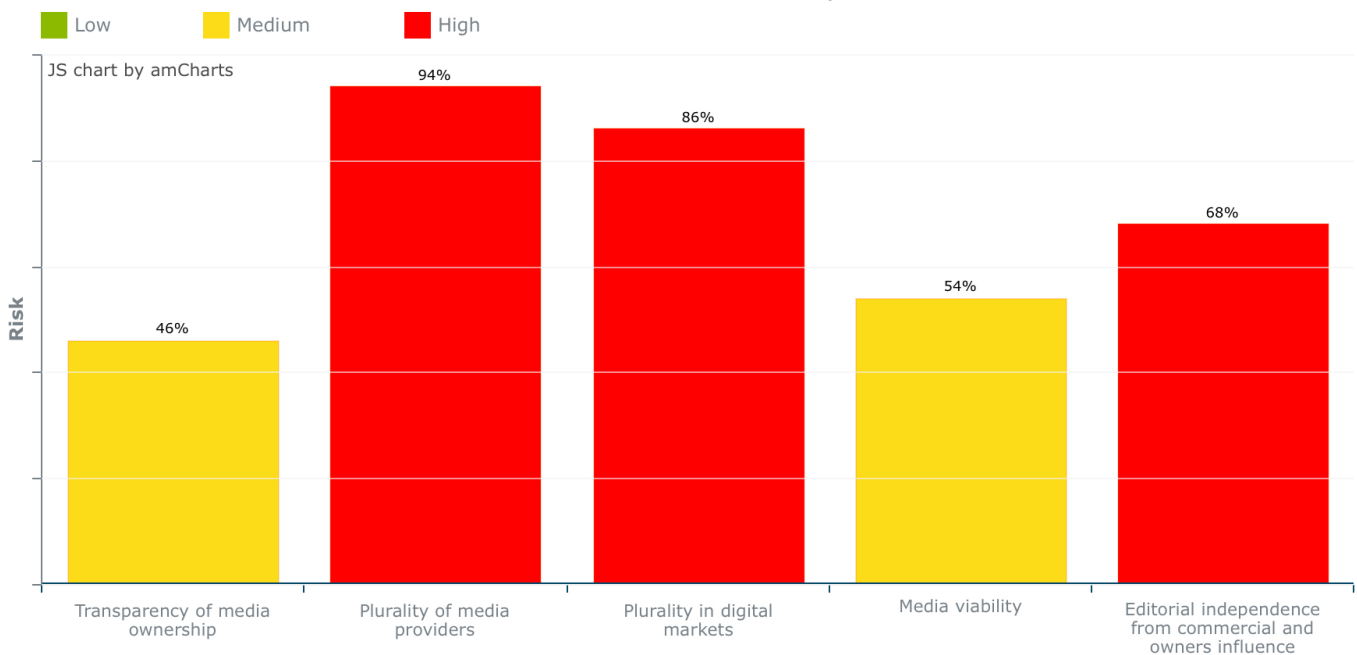
Universal reach of traditional media and access to the Internet

Malta continues to enjoy almost 100% broadband coverage at an average speed of 107.70 Mbps, with the top two internet service providers (ISPs), between them, servicing 95% of internet subscriptions. Furthermore, through its monitoring and findings, so as to ensure the availability of open internet access services, the MCA concluded that none of the operators engaged in traffic management practices were in breach of the EU Regulation, and that "none of the operators engaged in commercial practices that may restrict end-users' rights to choose and transmit content of their choice." (MCA, 2022, p. 50)

3.2. Market Plurality (70% - high risk)

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

Malta: Market Plurality



Malta continues to score an overall high risk in the area of **Market Plurality** (70%), as in the three previous MPM reports, and identical to the MPM2022 result.

The **Transparency of Media Ownership** indicator reaches a medium risk score at 46%.

The [Media and Defamation Act](#) (CAP. 579, Article 19) specifies that editors and a publishers must submit relevant details to the Media Registrar, however there is nothing in the text that requires ultimate beneficial ownership to be disclosed. Additionally, the information submitted to the Media Registrar is not publicly available as a complete and comprehensive list published, but may be accessed following a request. The ownership (shareholding) of all companies is regulated through company law. Such information is available on the [Malta Business Registry](#) platform. One must, however, be a paid-up subscriber to access parts of this information. Additionally, there is nothing in the Media and Defamation Act that specifies any particular sanctions in the event of non-disclosure. On the other hand, ownership of media companies is by and large public, as in the case political party owned stations. Apart from the [Companies Act](#) (CAP. 386), which requires all companies to publish audited accounts annually, for the purposes of a broadcasting licence, the [Broadcasting Act](#) (CAP. 350, Article 16) states that “the Authority may require from time to time from broadcasting licensees or contractors such declarations, returns, accounts, documents and other information as the Authority may consider necessary or advisable for the purpose of ensuring that the requirements of this Act are complied with.” The Act does not specify that financial reporting should be submitted annually, since licences are not updated on a yearly basis. Perhaps the most particular aspect of the Maltese media landscape, in terms of ownership, is the fact that the two main political parties - the PL (*Partit Laburista*, in government) and the PN (*Partit Nazzjonalista*, in opposition) - openly, and legally, own

and operate multi-media groups.

The **Plurality of Media Providers** indicator scores a very high risk at 94%.

In Malta, media concentration rules exist only for radio and television services, and when it comes to print media, no data about newspapers concentration and circulation is made publicly available. There are currently no rules in place with regard to cross-ownership of media - it is possible for one company to own broadcasting stations to the amount and type allowed by law, together with any amount of print or digital media, of whatever type or nature. Whilst the Broadcasting Authority oversees operations concerning broadcast, as well as some aspects of the digital media market, there is no overall media authority overseeing compliance with ownership limitations in the media sector or addressing relevant issues. Malta has 6 registered TV operators which are the PSM (TVM/TVMnews+/TVMSport+), One TV (owned by the Partit Laburista), Net TV (owned by the Partit Nazzjonalista), and the independently owned and commercially run Smash TV, F Living and Xejk (Department of Information, 2023). The AV market is dominated by PSM, One TV and Net TV, also reflecting the polarised political landscape, which, in turn is augmented by the existence of the two political party owned stations. The Broadcasting Authority tends to focus its monitoring of content, primarily, on PSM, especially during election campaigns, and considers the two political stations "as a whole", in that they balance each other out in view of their polarised views. This standpoint highlighted in the [Daphne Caruana Galizia Inquiry report](#), with the board stating that the BA's interpretation of "impartiality to date was always incorrectly considered that it applied to the public service only but not to the political party stations which erroneously are considered to balance each other." (Mallia, Said Pullicino & Lofaro, 2021, p. 441) On commercial matters, the Authority does monitor all stations and issues fines accordingly when directives are not adhered to. There is also lack of data when it comes to revenue market share across all platforms, as well as readership and circulation. The only [data](#) that is publicly available is commissioned by the Broadcasting Authority and documents audience data for TV and radio and, to a very limited extent, some aspects of the digital sphere.

The **Plurality in Digital Markets** indicator also scores a relatively high risk at 86%.

This variable is characterised by a widespread lack of data, and the [findings](#) published by the Broadcasting Authority need to be interpreted with caution, given the low number of responses. The impact of digital platforms on the media market is addressed below in the digital section of this area, however, in brief, although much data and information is lacking, the anecdotal narrative, as confirmed with local media workers, is that media outlets feel that they are essentially providing social media platforms with free content, whilst at the same time losing revenue because an increasing number of legacy media clients are shifting parts of their advertising budgets to social media. The frustration expressed by local media practitioners is that they view this as a vicious circle since they have to make use of these same platforms in order to direct traffic to their news sites. (H. Grech, personal communication, February 27, 2023)

The **Media Viability** indicator scores a medium risk at 54%.

The [Broadcasting Authority](#) (BA), [Malta Communication Authority](#) (MCA) and [Malta Competition and Consumer Affairs Authority](#) (MCCAA) do not publish economic data for the media sector. Both the political party owned media groups, which include 2 of the 3 leading local TV stations, have not published audited accounts for recent years, and they are both reported to be in debt. Media reports claim that "the Labour Party's media house has debts amounting to around €10 million", most of which relate to unpaid VAT, stamp duty, and water and electricity bills (Vella, L., 2022b), and that "Medialink, owned by the Nationalist Party, has €7 million in debt that is yet to be repaid to its creditors. Additionally, Medialink owes €14 million to the Nationalist Party itself." (Meilak, 2022). Additionally, PSM does not seem to have filed up-to-date audited accounts for 2021 and 2022, and questions have been raised as to whether the PSM editorial board

has submitted audited reports to government for 2019, 2020 and 2021. (Borg, 2022, Galdes, 2023) There is no media authority for the print market, company accounts are not publicly available, and it is practically unheard of that media companies publish their revenues. There has been no significant change in the broadcast media's output in terms of developing sources of revenue other than traditional revenue streams, whilst some local weekly newspapers publish specialised magazines or supplements that focus on particular events and charge extra for that particular edition. Furthermore, there is no reliable data available that sheds light on whether there has been an increase or decrease of journalists employed during 2022, and there are also no specific reports of layoffs, although the President of the Institute of Journalists (IGM) did confirm that, overall, conditions have worsened, in that, whilst reducing salaries is not permissible at law, budgets have been cut and, thus, any request for an increment is, subsequently, refused. (Personal correspondence, 21 February, 2023) With regards to direct subsidies from the state to media companies, apart from Covid-19 related funds, which were suspended in 2022, the government announced a one-off fund of €500,000 in October 2022, with the aim of assisting the print media, in view of a spike in the cost of paper. (Bonnici, 2022b)

The **Editorial Independence from Commercial and Owners Influence** indicator scores a high risk at 68%.

There is no specific mechanism granting protection to journalists in case of changes of ownership or editorial line. Moreover, there is no specialised trade union representing journalists, since the [IGM](#) acts more like an association rather than a union. Thus, working conditions are not regulated by a set of established industry standards. Additionally, the Broadcasting Act and the Code of Journalistic Ethics do not contain provisions or guidelines laying down that appointments and dismissals of editors-in-chief must not be influenced by commercial interests. Journalists, however, are covered by the protections granted by national labour laws also with regards to unfair dismissal, through the [Employment and Industrial Relations Act](#) (Article 75, 81 and 82). There are no self-regulatory schemes that ask for the disclosure of any actual or potential conflict of interest of the owners of the media that might affect the editorial content, but, as outlined in Norman Vella's research on Maltese media from the perspective of journalists, "regarding professional norms, most respondents (64%) said that they follow the current IGM Code of Ethics. However, the Institute has yet to find ways of enforcing it and there is no consensus on how this code of ethics should be updated." (Vella, N., 2021, p. 40) Good practices include The Shift News' [end of year revenue transparency approach](#) and blogger [Manuel Delia](#)'s commitment to have no affiliation to any organisation and to not accept any corporate or public funding. The fact that Malta has political party owned media platforms, and subsequently, newsrooms, it follows that journalists employed by the latter would need to align their political beliefs with that of the owner, which, in turn, inevitably influences their output. There is also indirect economic pressure on the media arms of the political parties, since party funding, unofficially, relies on business benefactors. And although Parties are obliged to give the Electoral Commission a detailed breakdown of donations they receive on an annual basis, both "Labour and PN have both failed to name a single major political donor for 2019, simply crossing out the section requesting the information in official documents." (Martin, 2022)

Focus on the digital environment

When compared to the overall MPM scores for **Market Plurality** (70%), the digital variables score 4 percentage points less at 66%, which also places them at higher end of the medium risk band.

Transparency of Media Ownership

There is nothing in the [Media and Defamation Act](#) that specifies any particular sanctions in the event of non-disclosure, for any media, however, the [Companies Act](#) requires all companies to publish audited accounts. The ownership of digital native media is publicly accessible and the UBOs of [The Shift News](#), [Lovin Malta](#), [Malta Daily](#) and [Side Street](#) are all visible on the Malta Business Registry's platform, whilst blogger Manoel Delia is self-employed and the only operator of his site.

Plurality of Media Providers

In Malta, media concentration rules exist only for radio and television services, whilst cross media concentration can be found in the political party owned structures. There is no dedicated, reliable data available with regards to the market share of online media. The only available figures, published by the Broadcasting Authority's [Audience Assessment](#) data, refer to "preferred source of news", and if online news portals was selected, then respondents were asked to specify which. However, the total number of individual responses for this question was too small to be considered as representative. A [separate analysis](#) measuring website activity, nationally, yields differing result to that of the BA.

Plurality in Digital Markets

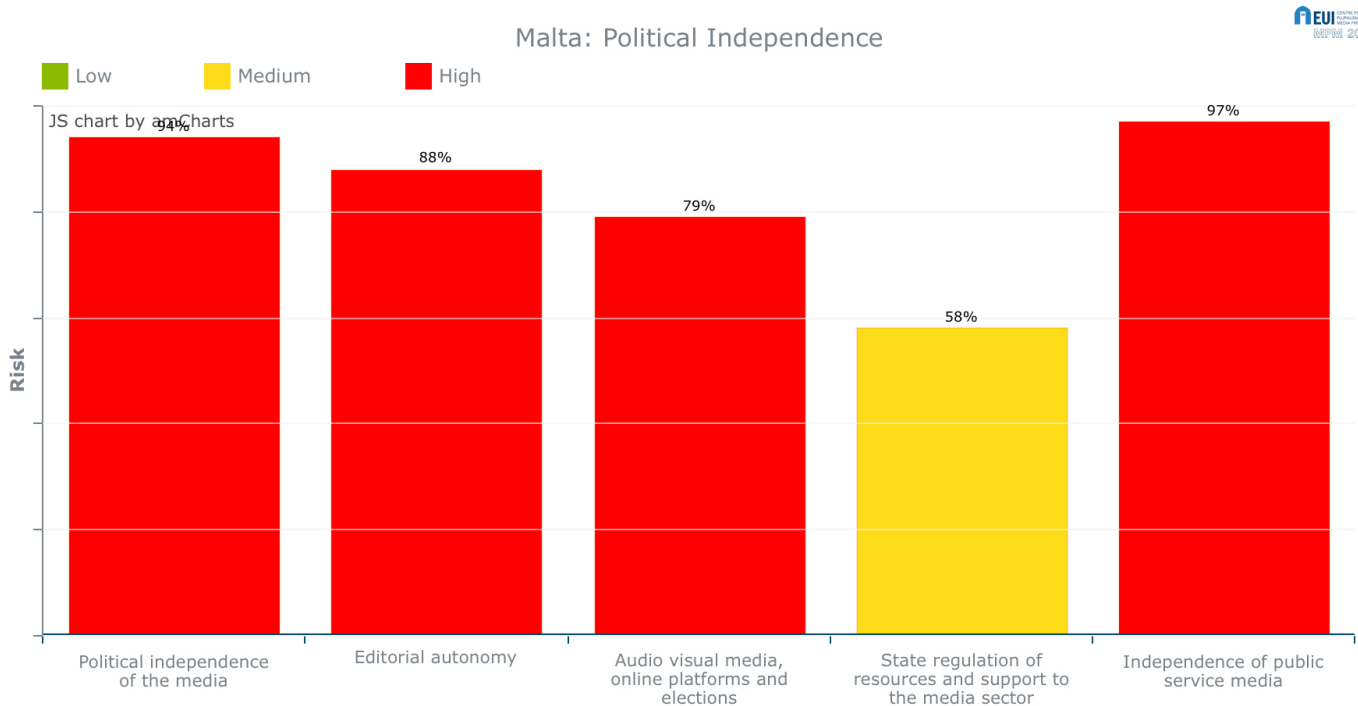
No data is publicly available with regards to the market share of the leading players in the online advertising sector. Facebook, which is strong in Malta, is the most used platform for watching online Maltese audio-visual programmes. This finding is evident across all age cohorts, followed by YouTube and lovinmalta.com, although these findings must be interpreted with caution, given the low number of responses. (Fsadni & Associates, 2022, p. 85) Additionally, there is no evidence of financial agreements between digital intermediaries and media providers for the use of copyright-protected content, or to contribute to their financing. The Times of Malta, which is the [leading online news portal](#) in terms of traffic, confirmed that they have no agreements with intermediaries.

Media Viability

There is no available data with regards to revenues of digital native media. The generation of income approach varies: The Shift News operates through crowdfunding, donations, grants from international NGOs/Institutions, one-off events, advertising sourced from trusted companies, and automatically generated online advertising^[8]; Manuel Delia relies on subscriptions and donations, and automatically generated online advertising; Lovin Malta and Malta Daily are commercial in nature; and there are no adverts visible on the Side Street platform. Timesofmalta.com have a donation option, urging readers to support independent journalism, whilst Lovin Malta also organise events and create innovative content aimed at increasing traffic, and therefore creating revenue opportunities. All other online news platforms do not seem to have any innovative income generating activities, apart from the traditional advertising sales routes. Furthermore, to date, there has been no public fund that has been designed at supporting the online media.

3.3. Political Independence (83% - high risk)

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



Overall, the **Political Independence** area scores a high risk at 83%, 4 percentage points higher than the MPM2022 (79%).

The **Political Independence of Media** indicator scores a very high 94% risk, same as previous year.

This is a direct consequence of the fact that the two leading Political parties continue to both own multi-platform media companies^[9], covering broadcast (TV and radio), print and online. It follows that such media outlets, can never be politically independent, since party policy, inevitably, is manifested in the editorial line of the respective newsrooms, and any non-aligned narrative is either filtered or censored completely. In 2021, the then editor of Lovin Malta, Christian Peregin, had challenged this scenario by filing a [constitutional case](#) arguing that the law permitting political party owned stations is unconstitutional, and contributing towards distorting the political landscape, and perpetuating a divisive climate (Diacono, 2021). The case, however, is still ongoing, and there has been a lull in the national debate, so any developments are not likely to take place in the near future. The broadcast scenario is particularly problematic. The three leading TV stations^[10] dominate with a combined audience share of over 60% (Fsadni & Associates, 2022, p. 17). Of these, two are owned and operated by Political parties (One TV and Net TV), whilst the other (PSM) is perceived to be “government controlled” (Borg & Comodini Cachia, 2023, p. 173). Added to this, the members of the board that regulates broadcast media, the Broadcasting Authority, are directly appointed by the two main political parties, thus creating a scenario where, fundamentally, the same political parties regulate their own audio-visual media, with no input from members of civil society, smaller party representatives and other constituted bodies. There are no news agencies in Malta - only newsrooms and

news outlets - so, essentially, there is no news agency on which political groupings can apply pressure. A number of journalists act as local representatives for international agencies.

The **Editorial Autonomy** indicator scores a high risk at 88%, an identical result to the MPM2022.

No common regulatory safeguards exist that could guarantee autonomy when appointing and dismissing editors-in-chief, and every newsroom has its own set of procedures. The high risk evaluation is in view of the political party owned media outlets, as outlined above, and the ramifications that such a scenario generates. Additionally, criticism leveraged towards PSM for being the mouthpiece of the government, further exacerbates the situation. Media academic, veteran broadcaster and ex-PSM Editorial Board chairperson, Rev. Dr. Joe Borg, recently wrote, "unless PBS is totally divorced from government control we will continue suffering from a destructive democratic deficit" (Borg, 2022). A controversial case involved the suspension of Victor Vella, editor of the daily newspaper L-Orizzont, which is owned by the influential General Workers Union (GWU) and which is traditionally linked to the PL in government. The IGM [expressed concern](#), claiming that this disciplinary action was "linked to editorial decisions taken by Vella and which did not go down well with the company's management", also claiming that that he had not "departed from the principles that underpin the Union Print" (Institute of Maltese Journalists, 2022). The understanding was that political pressure had been placed upon the management to sack the editor, in view of his stance in sympathy with irregular migrants and his opinion on rising numbers of people on the poverty line, which was in direct conflict with the government's message. Independent newsrooms, like The Times of Malta, The Malta Independent, MaltaToday, The Shift News, Newsbook and others, are also subject to political pressure, but they publish a variety of opinion writers who hold different viewpoints. However, issues of financial instability, and owing to the fact that the government is one of the leading advertising clients for local media organisations raises concern, since pressure may be applied indirectly if withholding of campaign budgets are used as a veiled threat. Additionally, Norman Vella (2021) notes that the respondents of his research, who were journalists and editors, "believe that Maltese journalists are influenced both by the political and commercial interest of the organisation they work for." (p.39-40)

The **Audio Visual Media, Online Platforms and Elections** indicator considerably increased to 79%, reaching the high risk band.

2022 was a general election year for Malta and, as for all elections, whether local, European or national, the Broadcasting Authority issued a set of [guidelines](#) on fair representation on audio-visual media^[11]. The guidelines were based on previous formats, with their main focus being on broadcast, and not online campaigning. There is no internal charter of PSM or other self-regulatory instrument since PSM is regulated by the Broadcasting Act. This does not guarantee impartiality and access to PSM channels for all political actors, as noted in the ODIHR/OSCE Election Expert Team Final Report for the 2022 General Elections in Malta: "Despite the constitutional obligation for due impartiality in public and commercial broadcasting no measures were taken by the BA to enforce this obligation during the campaign period. The BA informed the ODIHR EET that the requirement for impartial coverage outlined in the Broadcasting Act only applied to the PBS and not the two major private TV stations which are owned by the PL and PN. This interpretation of the law is based on a provision in Article 13 of the [Broadcasting Act](#) which holds that, with exception of the PBS, when assessing the impartiality requirement, the Authority, "shall be able to consider the general output of programmes provided by the various broadcasting licensees [...], together as a whole" (OSCE, 2022b, p. 16). The Authority scheduled a number of debates to be broadcasted by PSM. Small parties were scheduled to debate each other, resulting in smaller parties arguing that they were being denied the possibility of debating the PL and the PN. (Calleja, 2022). As communicated to the ODIHR by the BA itself the "prioritization of airtime for the two parliamentary parties is proportionate and equitable given previous election results" (OSCE, March 2022a, p. 10). Thus, since the two main parties dominate the political

landscape, this results in a vicious circle wherein smaller parties and independent candidates never qualify to equal airtime, also confirmed by the SGI (Sustainable Governance Indicators) 2022 country [report for Malta](#), stating that "the BA focuses on the PBS (public broadcasting service) and not private outlets. It also does not monitor campaign coverage but rather acts on complaints ... smaller parties or independent candidates do not receive equal treatment by the state-owned media or any media." (Calleja & Pirotta, 2022). Internet based media outlets and independently owned newspapers provided more independent coverage, and they included a wider spectrum of opinions.

The **State Regulation of Resources and Support for the Media Sector** indicator, scores a medium risk at 58%, with no change in score.

With the exception of PSM funding as well as Covid-19 subsidies distributed during the pandemic, the Government in Malta does not normally provide any financial assistance to privately owned media organisations, so Malta has no legislation in this regard. The press sector is viewed upon as a commercial venture with the attendant risks associated therewith. However, in 2022, the Malta Government also announced a one-off fund of €500,000 to assist the print media in coping with the rise in the cost of paper. The subsidy which was announced by means of a press release devoid of any detail (De Gaetano, 2022). The manner in which funds were going to be distributed was only explained after a parliamentary question was asked, and after half of the funds were allocated. According to media reports, the distribution of the funds is based on the number of employees, publications and the frequency of the publications (Bonnici, 2022b). A number of media outlets are subsidised by their owner institutions, like the Catholic Church and the Political parties. Information about the allocation of indirect state subsidies for media outlets by government, in the form of advertising or sponsorship is not publicly available and there is no legislation that regulates the process. In 2021, the Commissioner for Standards in Public Life published [Guidelines on Government Advertising and Promotional Material](#), following the criticism of certain ministers for using public funds to promote their personal candidature. However, "these guidelines do not represent new rules. They indicate how the Commissioner will apply the existing code of ethics for ministers in cases that involve publicly-funded advertisements or promotional material" (Commissioner for Standards in Public Life, 2021). During the months of October and November 2022, according to information provided by the Office of the Prime Minister, the government spent €115,000 in promoting budget measures over a span of three weeks. A breakdown of the expenditure and how it had been allocated was never published, in spite of questions asked by the media (Carabott, 2022). Ultimately, no reports about campaigns booked, with which media outlets and an allocation breakdown are published by the State. "This means the government can choose to favour media outlets owned by the Labour Party when it comes to allocating its advertising budget, such as when 18 ministers and parliamentary secretaries paid €16,700 in public funds for ads in a single edition of the party's Sunday newspaper Kullhadd last January" (Diacono, 2022). In 2021, NGO Repubblika took the initiative of publishing a draft of proposed [guidelines on information and advertising campaigns by the government](#), specifying, amongst other things, that "allocation of advertising by government entities must not be grounded in discriminatory criteria" and that "any decision on the allocation of advertising must be grounded in objective criteria related to the audience targeted by the campaign and the reach of the media concerned." (Repubblika, 2021, point 43) To date, these have not been formalised.

The **Independence of Public Service Media** indicator scores a very high risk at 97%, which is the same result as for the MPM2022.

There has been no change in the direct manner in which PSM members of its Board of Directors, its Editorial Board and key decision-making personnel are appointed by the State, meaning that the government continues to have significant and direct influence on PSM structures. The current PSM Chairperson, Mark Sammut, who was appointed following the resignation of the previous chair, a media

academic, just six months after her appointment, has no prior media experience. Additionally, his contract was a source of controversy after an FOI request for the publication of his contract by The Shift News was denied. “Sammut spent two years resisting the publication of his contract and waged a legal battle with lawyers, paid by PBS, and funded by taxpayers, to argue that it should not be made public” (Muscat, 2023, n.p.). The previous CEO, Charles Dalli, was named COO, responsible for research, innovation and internationalisation, and in January 2022 was also appointed Editor in Chief, relieving the current Head of News, Norma Saliba, of one of her roles. Dalli, an engineer by profession, is a former ONE TV (PL owned) employee. He joined PSM in 2013 when the PL won the general election and has, since, been promoted from Engineering Manager to Operations Manager in February 2016, to Deputy CEO in August 2016, to Acting CEO, and eventually, CEO in 2018 (Demarco, 2022). Saliba's publicly known close affiliation to the Partit Laburista is also problematic, and she is often criticised for editorial decisions that are perceived as promoting the government's agenda (Schembri, 2020). A case in point, PSM came under fire for censoring the essence of the Pope's anti-corruption message during the Papal visit of 2022, which took place during the general election campaign period (Amaira, 2022). Another issue concerned independent candidate Arnold Cassola, who filed a complaint when his revelations about the arrest of an individual close to former PM Joseph Muscat were censored by PSM (Vella, 2022b, Cassar, 2022). A FOI request, filed by The Shift News, and denied by PSM, asked for the publication of the names of the persons on the PSM editorial board and details on their remuneration. The Data Protection Commissioner ruled that PBS' refusal to publish this information broke the law, and ordered the company to make the requested information public. After much resistance, the Minister responsible confirmed that there had been no change to the editorial board's members post the 2022 general election (The Shift Team, 2022c). Amongst its responsibilities, the editorial board is tasked with presenting annual reports that detail whether PSM are fulfilling their public service obligation and justify taxpayer funds allocated to them. Yet, reports from 2016 to date have not been published (Galdes, 2023). Furthermore, although it used to in the past, government has stopped publishing details of payments to different independent producers for programmes of extended public service obligation produced for PBS. In a separate request, The Shift News asked for information on the contract and remuneration given to Mark Vassallo, a lawyer and the board secretary of PSM, after he was caught on camera directing the live broadcast of one of the Labour Party's campaign mass rallies, which was broadcast live on the Labour Party's ONE TV. PBS (PSM) was also asked to provide a copy of the code of ethics by which the board secretary of the PSM is bound, since the role gives him access to very sensitive information. This request was also refused, and no action was taken against Vassallo by the state broadcaster (The Shift Team, 2022d).

Focus on the digital environment

At 60.3% medium risk, the digital variables for **Political Independence** score a substantial 23 percentage points less than the overall score, which is placed in the high risk band at 83%. Leading native digital platforms are not affiliated to any political entity, which is, potentially, the reason behind the difference in risk factor.

Political independence of Media

The two main digital native platforms are [The Shift News](#), which is a dedicated investigative news portal, launched following the assassination of Daphne Caruana Galizia, and [Lovin Malta](#), which is a mixture of news, entertainment, popular culture and gossip. Other platforms include [Malta Daily](#), and [SideStreet Malta](#) (who seems to have migrated to Instagram and Facebook), although these seem to have little impact and reach, so far. They are both independently owned and are not evidently affiliated to any political parties. Bloggers who publish current affairs content include activist and author [Manuel Delia](#), author and historian [Mark Camilleri](#) and academic [Simon Mercieca](#). Other prominent online news media are all affiliated with legacy media platforms, and vary from independent newsrooms to those owned and operated by Political parties which, invariably, toe their respective party's line.

Editorial Autonomy

As referenced above, with the government and other state entities being amongst the leading advertising clients for local media, the issue of indirect pressure on online news platforms, whether digital native or linked to legacy media remains. For this reason, the lack of common regulatory safeguards that could guarantee autonomy in appointments and dismissals extends to the digital sphere.

Audio Visual Media, Online Platforms and Elections

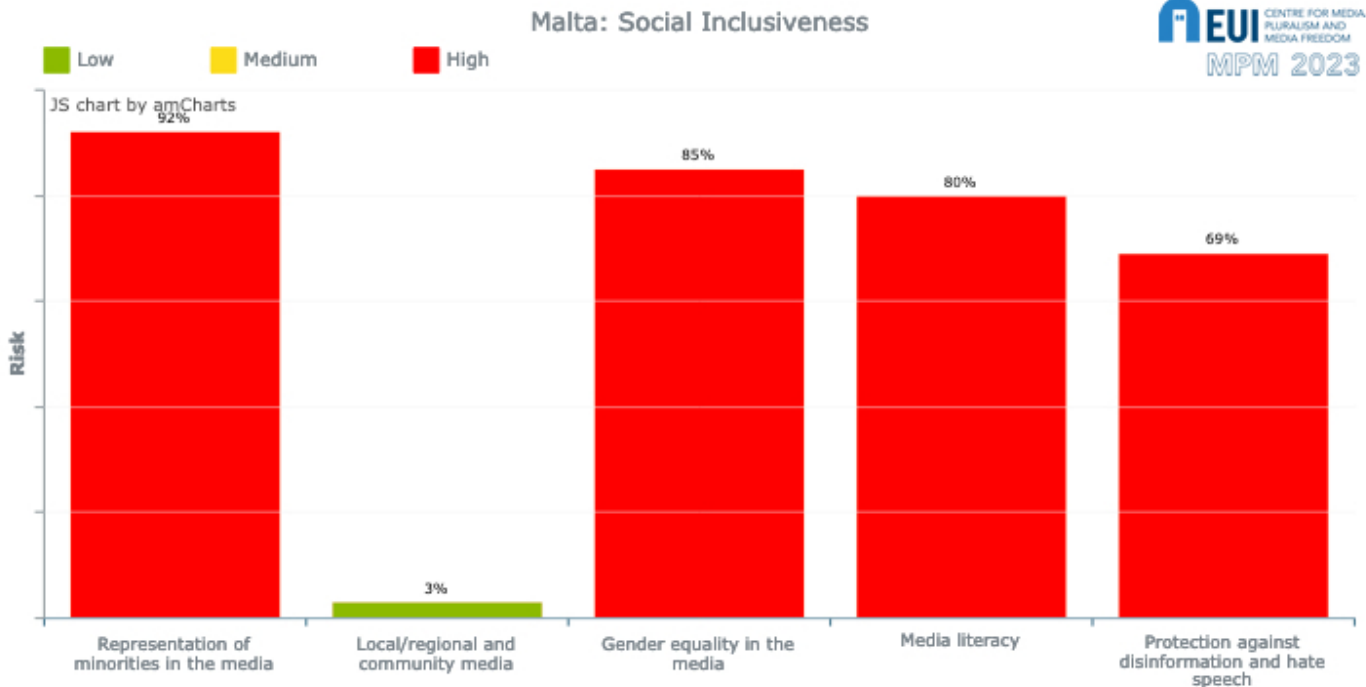
This 2022 general election saw increased political advertising activity online, and spending estimates published by the independent media highlighted how the big parties' spend on social media and online advertising, were substantial for a country the size of Malta (Vella, L., 2022). The [Daphne Caruana Galizia Foundation's report on the 2022 General Elections in Malta](#), highlights discrepancies in online campaign advertising spending, contrasting the two larger parties' spend with that of smaller parties and independents. "This gap is widened when referring to Google's Transparency Report tool, which shows that Political party leaders Robert Abela and Bernard Grech published videos paid for by their respective Political parties on their individual candidate accounts. This could have potentially given them an unfair advantage in their campaign and could be reviewed as another way of circumventing the law limiting campaign spending" (Spiteri, 2022, p. 12). The report also highlights "a severe lack of transparency regarding the election campaign finances of the two major Political parties and their candidates", citing a lack of political accountability for both candidates and parties to record, audit and declare all sources of funding for their campaigns. The author argues that, while independent media should investigate the matter, there is a conflict of interest in view of the fact that political parties spend hundreds of thousands of euros on online advertising that, in turn, is featured on local media platforms (Spiteri, 2022, p.12-13). Political parties are not obliged to break down their Electoral Campaign expenditure in detail, even if candidates have stricter rules, and the [General Elections Act](#) (CAP. 354) is vague, in that although elected candidates are duty bound to declare all expenses within ten days from being elected, there is a lack of clarity in what needs to be submitted. (Article 118)

Independence of public service media

There are no legal provisions that stipulate whether funding adequately covers the online public service missions of the PSM without distorting competition with private media actors. Not only does PSM receive direct state funding, but they compete directly with all other independent and commercial platforms by selling advertising space and time directly. Additionally, all the issues mentioned above in relation to how the government continues to have significant and direct influence on PSM structures and content extends to the digital output. Although the [Broadcasting Policy](#), which has not been updated since 2014, addresses digital media, the thrust is more of a commercial one, with the objectives of creating new revenue streams and having a competitive advantage. (p. 27)

3.4. Social Inclusiveness (66% - 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.



Overall, the **Social Inclusiveness** area scores a medium risk, at 65%, just 1 percentage point away from high risk and 3 percentage points higher than the MPM2022. With 4 variables hitting the high risk band, the only reason behind the overall medium score is because of the low 3% obtained in the **Local/Regional and Community Media** indicator, since this section is not applicable to Malta.

The **Representation of Minorities in the Media** scores a very high risk at 92%, 4 percentage points higher than last year's MPM2022. (In 2022, this indicator was labeled Access to Media for Minorities).

There are no legally recognised minorities in Malta. Therefore, there are no specific provisions regarding the access to airtime or media space for minorities, in spite of the fact that the number of third country nationals residing and working in Malta has increased exponentially (Jobsplus Malta, 2021) and over 20% of the Maltese population is made up of foreign nationals (NSO, 2022, p.30), 5.2% of whom are Asian (NSO, 2023). Yet, minority groups continue to be largely absent from the local media landscape, and the lack of data available paired, with invisibility is not conducive to promoting acceptance and integration. Additionally, apart from the fact that the policy document [Migrant Integration Strategy & Action Plan: Vision 2020](#) makes no mention of media representation for minorities, political discourse on the subject, which is reported upon regularly, tends to be negative, or focuses on irregular immigration of persons arriving by boat from North Africa. The latter is a divisive issue locally, and the Maltese authorities have been criticised for openly committing pushbacks at sea, as well as for the poor living conditions of migrant detention centres (ANSA, 2023). When asked about the monitoring of representation of minorities on PSM, the Broadcasting Authority CEO replied that "with regards to the portrayal of minorities in broadcasting, there is no policy in place, however, the provisions of balanced and fair and impartial representation are in place." (personal correspondence, 9 December, 2022) Essentially, this does not commit to overseeing that minorities are duly represented. The NGO [African Media Association Malta](#), whose objectives include developing an inclusive

multi-media network for members to find a place to debate, publish a web magazine and, through their online community podcasts, broadcast news, stories and relevant information targeted at asylum seekers. (Agius, 2021) Malta's [2021-2030 National Strategy Rights of Disabled Persons](#) consultation document (2021) stipulates objectives with a five-year time frame regarding access services the media for people with disabilities, but there is no legal framework in place, and it is only the intention to improve services that is outlined (p. 50). Maltese Sign Language was [recognised as an official language at law](#) in 2016, yet sign language interpreting is only available on very occasions, namely: political debates organised by the Broadcasting Authority, mass meetings organised by Political parties, some local TV news programs (news at 18:00 on PSM news channel TVMNews+); and adverts which are EU or state funded.

The **Local/Regional and Community Media** indicator scores just 3%.

In view of Malta's size, both in geographical (316 km²) and population terms (519,000), as well as an over saturation of nationwide media platforms, regional media are not viewed as essential, since much focus on "regional" cultural content is also given by the main media platforms. The island does have a few community radio stations, which are explicitly recognised by the law. They generally operate through volunteers and sponsorships from the local businesses and SMEs, and cover range of approximately 3 km. There is no evidence of political censorship or interference. According to the June 2022 Broadcasting Authority Audience Assessment report, the only five Community Radio Stations to feature in it the total result have a 1% listenership - just over 5,000 people - of the shared audience share, and this is not exclusive since respondents could mention up to 3 radio stations. (Fsadni & Associates, 2022, p.61) Local councils get coverage on PSM and most of the other TV and radio stations, as well as adequate coverage on newspapers and online platforms affiliated with legacy media.

The **Gender Equality in the Media** indicator is in the high risk band at 85%, 12 percentage points higher than the MPM2022 score, which was 73%. (In 2022, this indicator was labeled Access to Media for Women).

PSM does not have a dedicated, specific gender equality policy, but follows the [National Equality Policy](#), which was updated in 2021. The document is general and addresses personnel issues in the public sector. It includes guidelines regarding the possibility of seeking redress if an employee has reason to believe that they have been discriminated against, or unfairly treated. As with a number of other variables, there is a lack of official data that would quantify representation within media structures, as well as visibility and participation in news and current affairs programmes. The latest available figures stem from a study conducted by the Broadcasting Authority, entitled [Assessment of Gender Representation in Current Affairs Programmes](#), which found that the percentage of women experts or guests participating in current affairs programmes was 18.3%, echoing earlier studies. (Axiac, 2020, p. 29). Based on this research, the BA issued [Gender Representation Guidelines for Discussion Programmes](#), which PSM is required to follow, and which ought to serve as guidance to all broadcast platforms. Nevertheless, since these are just guidelines, they are not legally binding. The Parliamentary Secretariat for Reforms and Equality published a policy paper: [Gender Equality and Mainstreaming Strategy and Action Plan 2022-2027](#), however, the only action in reference to media (Action 4.3.2, p. 21) is to "monitor the newly adopted Gender Representation Guidelines for Discussion Programmes and ensure that adequate training and support is provided as required." (2022, p. 19) In the political sphere, women politicians have become more visible following constitutional changes that were passed by in April 2021, known as the [Gender-Corrective Mechanism](#), and which led to an additional 12 women co-opted to Parliament. Still, general observations show that gender balance has not been achieved in the news media, with most current affairs discussion spaces being dominated by men. One might argue that print and online media has seen a slight improvement in terms of more women journalists and opinion columnists, but concrete scientific and comparative data needs to be conducted for

an accurate picture to be drawn.

The **Media Literacy** indicator scores a high risk at 80%, 3 percentage points higher than the previous edition of the MPM (77%).

It has been over two years since the Media Literacy Development Board was appointed and, to date, the only available information about this board is its announcement, news items about a change in of the chair six months after it had been set up, and a [blank landing page](#) on the Department of Information's platform, where one may not check who its current members are. No working documents or proposals have been put forward and, thus, Malta still has no comprehensive Media Literacy Policy. Media literacy is still not a compulsory subject in the education curriculum, but may be offered as an optional SEC vocational subject, entitled Media Literacy Education, at secondary school level. The first MATSEC certificates including SEC Media Literacy Education were awarded in 2020 (G. Zahra, Principal Area Officer, MATSEC, personal communication, February 25, 2022). The Ministry of Education hosts a [Digital Literacy Website](#), in which there are a few useful resources for teachers and parents. It seems to be mainly targeted towards refining digital skills, although in 2021, there were a handful of events that included Media Literacy in their programme. (Directorate for Digital Literacy & Transversal Skills, 2022) The Open Society Institute's [Media Literacy Index](#), published in October 2022, ranks Malta in 26th place out of 41 countries surveyed, and placed the country in a cluster that described the situation as being "at risk of slipping further down in the ranking" (Open Society Institute - Sofia, p. 9). Alex Grech, academic and director of the 3CL Foundation, sustains that media literacy activities in Malta are rare, and that everything else is incidental. Grech feels that Media Literacy as a non-compulsory subject in primary and secondary schools is problematic. Added to this, it is often taught as part of PCSD (Personal, Social and Career Development) units, which, he claims, does not even cover the bare minimum, and once students are enrolled at university, it's almost too late to deal with (Interview, February 2, 2023). Consequently, one must take in to consideration the fact that not all school leavers enrol in tertiary education. For this category, there is no evident media literacy tuition, and with Malta having the highest percentage of early school leavers (Eurostat, 2020), this is of major concern (The Malta Independent, 2020), even if there has been a 14% increase in 25-34-year-olds with a tertiary level of education since 2011 (Abela, 2021).

The **Protection against Disinformation and Hate Speech** indicator scores a high risk at 69%, down 2 percentage points from the previous MPM (71%). (In 2022, this variable was entitled Protection Against illegal and Harmful Speech)

On an institutional level, in Malta there is nothing that formally and specifically targets disinformation. Although the Prime Minister pledged to seek stronger measures to fight cybercrime following the media spoofing attacks of 2021, and tasked the [National Cybersecurity Committee](#)^[12] (NCC) to draw new proposals to fight the phenomenon (Sansone, 2021), the word disinformation does not feature once in the [Objectives landing page](#) of the same Committee. Furthermore, the [National Cybersecurity Strategy 2023-2026](#), published in 2021 by the Malta Information Technology Agency (MITA) through its Cybersecurity National Coordination Centre (NCC), only addresses disinformation once^[13], and states that "the need to ensure a more inclusive response to threats and hazards is growing as the ramifications of cyber-attacks are felt domestically and worldwide. Indeed, recent EU Council conclusions called for such a need in the light of increased vulnerability to hybrid threats posed through 'malicious cyber activities, disinformation and threats to economic security'" (p. 44) Fact checking initiatives are mainly conducted by journalists and independent media, like the recently launched cooperation between The Times of Malta and the Department of Media and Communications at the University of Malta, that focuses on identifying disinformation and false claims made by organisations, public and political figures (Times of Malta, 2022), and The Shift News' "Disinformation Watch", a series of articles that call out disinformation, fact check it and explain the context

(De Gaetano, 2022b). Another initiative was the [3CL Foundation](#) 2-day conference, held in November 2022, with the theme [Young People and Information: It's Complicated](#). The event focused on disinformation and misinformation, particularly information secured online and the relationship of young people with the media and technology (3CL Foundation, 2022). These initiatives are far from enough and, although, there is not enough data to confirm how widespread disinformation is, observing the media landscape one may conclude that the threat to democracy is real, for a combination of reasons, which include: political parties owning multiple media platforms and their widespread impact; the PSM's bias towards the party in government; organised social media groups, designed to manipulate and target dissenting voices (civil society, individuals, the opposition); and the widespread reach that these organised social media groups have. The [Criminal Code](#) has been updated to include "incitement to hatred" (Art. 82A, 82C and 83B), defined as stirring up "violence or hatred against another person or group of persons on the grounds of gender, gender identity, sexual orientation, race, colour, language, ethnic origin, age, disability, religion or belief or political or other opinion" and can be liable to a term of imprisonment of between 6 to 18 months (2021). To date, however, Malta, has never [submitted information on hate crimes](#) to OSCE/ODIHR (OSCE/ODIHR, 2022b).

Focus on the digital environment

Media Literacy

As outlined above, there is no Media Literacy Policy in place in Malta, and no effort on a national scale to address the issue. Malta does have a Digital Literacy Policy (2015) and, in view of the fact that, often, Media Literacy is interpreted as having digital skills, it is estimated that 61% of the population has basic or above basic overall digital skills (Eurostat, 2023), which is considered medium risk. Naturally, for all the reasons mentioned above, a population that is tech-savvy, yet lacks the skills needed to navigate through the digital sphere with a critical and analytical approach, presents a problematic scenario.

Protection against Disinformation and Hate Speech

There is no national strategy that is designed to tackle disinformation, although there are a few fact-checking initiatives, mainly led by independent news outlets, like the Times of Malta and The Shift news, as referenced above. These are conducted with high ethical and professional standards and their funding is transparent. In the case of the Times, the initiative is part of an EU-funded project establishing a Mediterranean hub of fact-checking organisations across Malta, Greece, and Cyprus, named [MedDMO](#), whilst the Shift operates through crowdfunding and automatic online advertising, and only accept direct advertising through a Corporate Democratic Responsibility programme (CDR). In their own words: "We choose the companies to approach. We understand that not every company in Malta is corrupt – family businesses have been built over decades of hard work and effort." (The Shift Team, 2022b) Although Hate Crimes and Hate Speech are now included in the [Criminal Code](#), there is no reporting as to how effective or efficient this is. Reasons for this may be in view of, amongst other things, a lack of understanding as to what hate speech is, and a lack of awareness with regards to reporting procedures. Additionally, there does not seem to be any distinction between reporting online and non-online incidents. The fact that the authorities have not published any figures for 2021 and 2022 is not encouraging. A handful of initiatives are far from enough and, unless accurate and timely data is collected, there is no way of knowing how widespread disinformation and hate speech is. Still, as outlined above, when observing the media landscape, one may conclude that the threat to democracy is real, for a variety of reasons, that range from political parties owning multiple media platforms and the polarisation instigated by their narrative, to the perceived PSM's bias towards the government, and to the widespread reach of organised social media groups that target dissenting voices (civil society, individuals, the opposition). Furthermore, as highlighted by Grech, "retribution is real" in small country like Malta, and the fact that young people and children are not encouraged to speak their mind in the classroom sheds light on the context within which all this is taking place. (Interview, February 2, 2023)

4. Conclusions

For the fourth consecutive year, the results from the MPM2023 shed light on the fact that Malta needs to urgently address a number of issues that have remained unresolved. The much-needed media reform is long overdue, and if the country is to strengthen the media landscape into one that is truly democratic, this needs to be implemented without further, unnecessary delay. The report would also like to acknowledge initiatives taken by independent media practitioners and members of civil society, who have taken it upon themselves to put forward concrete proposals in the reform of aspects of the media landscape, amongst them, the recent publication *Reforming Malta's Media System* (Borg & Comodini Cachia, 2023). Apart from a thorough unpacking and analysis of the current scenario, the authors propose a set of sixteen concrete measures that are worthy of serious consideration.

Most of the proposals listed below echo those of last year, since little or no progress has been registered in the past 12 months.

Fundamental Protection is, once again, the only area where no high risk scores were registered. Whilst noting that a somewhat wider consultation by the Committee of Experts in Media, as proposed in the last MPM, did happen, more discussions will need to take place, since consultation seems to have been limited to a poorly attended three hour seminar during which journalists and interested parties were informed of the Committee's proposals. Nonetheless, some issues are in need of urgent attention.

- Freedom of Information requests need to be addressed in a timely and transparent manner. Consistent resistance and a lack of cooperation, together with multiple appeals against orders to publish are nothing but delaying tactics, designed to exhaust journalists, whilst preventing them from covering stories of public interest.
- There needs to be a collaborative effort at implementing the much needed media reform, by means of a process that is transparent and truly inclusive of all stakeholders. Maltese newsrooms deserve much better, and political rhetoric, coupled with soundbites that further put journalists at risk, need to stop and be replaced by a genuine will to strengthen the profession and offer the support that is required.

The area of **Market Plurality** continues to be problematic in assessment, hence the high risks registered, in view of substantial data gaps with regards to transparent, publicly available figures pertaining to market shares of media companies, both legacy and digital, advertising revenue, as well as a lack of information on print media circulation figures and online traffic. Additionally, the absence of a specialised union for the protection of the journalistic profession remains an issue.

- Self-regulation of the news media is long overdue, and the Institute of Maltese Journalists (IGM) needs to be given all the support necessary by the state, amongst others, to achieve due status, including financial backing. This would enable journalists to take control and defend the integrity of their profession. Additionally, any other regulatory structures, namely the Broadcasting Authority, need to be set up with the participation of members of civil society and other constituted bodies, and not just appointees of the two main Political parties.
- As stated in previous reports, the establishment of a comprehensive and independent Media Authority, overseeing all platforms, would benefit all media outlets. The Authority would be set up with the input and participation of all stakeholders, including the self-regulatory structure proposed above. Whilst

regulation should be the responsibility of the profession, the Authority would be tasked with setting standards and collecting market data and conducting research in relation to all media platforms, that would, in turn, inform policy and decision-making processes, with the objective of improving each sector operationally, as well as strengthening the credibility of its practitioners.

Some of the highest risk scores for the Malta report are in the area of **Political Independence**, in view of evident problematic areas like the ownership of multiple media outlets by the Political parties and the atmosphere of polarisation that they, inevitably, contribute towards, as well as the over-dependence of PSM on state funding and the direct involvement that the government has upon its governance.

- The Political party-owned media scenario needs to be addressed in a constructive, forward-looking manner, that would ensure that all Political actors would still have a space to debate in a healthy and exemplary fashion. Furthermore, until such developments take place, it is being proposed that the Broadcasting Authority refrains from considering the two camps as a whole (with the understanding that they neutralise each other's narrative), but applies the rules of balance and impartiality to both, independently of the other.
- Additionally, it is being reiterated that the PSM is to be structured in a manner that is independent of the state, and that it is managed transparently, be it in content as well as appointments procedures. Moreover, its remit should ensure that it is accountable in its fair representation of all participants in the public debate, honouring its public service responsibilities of balance and impartiality,

The area of **Social Inclusiveness** sees very high scores in all the variables except one, in relation to community and regional media, which is not applicable to the Maltese islands in view of its geographical size. It is unacceptable that, more than two years from its set up, the Media Literacy Development Board has not published, at the very least, a working document. Additionally, the exclusion of multiple minorities and underrepresentation of specific groups from the media landscape is not conducive to an inclusive society. Educational strategies are lacking in most areas, and the publication of policy documents that outline generic, and sometimes vague, schemes, do not produce concrete results.

- Malta is still in urgent need of comprehensive media literacy policy, that addresses both formal and informal education strategies, so as to include all members of society, with a clear set of objectives and timelines. The policy should be designed in a manner that would empower consumers, of all ages, with confidence to navigate all media platforms safely and with a critical approach.
- It is once again being recommended that, instead of issuing guidelines that tend to be interpreted as optional, the Broadcasting Authority issues clear and comprehensive directives, that apply to all media practitioners, and that ensure that all minority groups in Maltese society are given due space, as well as fair and accurate representation.

5. Notes

- [1] Government of Malta (2022). Information Note: Establishment of the a Committee of Experts on Media. <https://www.gov.mt/en/Government/DOI/PressReleases/PublishingImages/Pages/2022/01/11/pr220024/pr220024a.pdf>
- [2] Department of Information (2020). Press Release: The Broadcasting Act is going to be updated for effective and safe use of all media platforms. <https://www.gov.mt/en/Government/DOI/PressReleases/Pages/2020/July/10/pr201322en.aspx>
- [3] The PL (Partit Laburista - in government) and the PN (Partit Nazzjonalista - in opposition) own and operate multimedia outlets, One Productions Limited and Media.link Communications Company Limited, respectively, which include TV, radio, print and online platforms.
- [4] A number of independent media houses protested at the lack of transparency in distribution of Covid funds, and claimed that particular outlets were being discriminated against, with broadcast operations, including party-owned media, being treated more favourably. <https://ipi.media/covid-19-funds-threaten-media-independence-in-malta/>
- [5] Department of Information (2021). Press Release: First Media Literacy Development Board appointed intending to develop media literacy skills. <https://www.gov.mt/en/Government/DOI/PressReleases/Pages/2021/January/28/pr210187en.aspx>
- [6] The 5 members on the board of directors of the Broadcasting Authority are appointed as follows: 2 are appointed by the Partit Laburista (in government), 2 by the Partit Nazzjonalista (in opposition), whilst the chairperson is, generally, appointed with the consensus of both political parties.
- [7] The case was filed over two separate incidents: the first concerning the fact that PBS had delayed a right of reply by three months, after the PN filed two complaints before the Broadcasting Authority; The second concerned 2022 Budget political advertising, wherein 15 minutes' worth of PN adverts (each 30 seconds long) were deemed to have been "neutralised" since they were broadcast in between government ads. (Brincat, 2022)
- [8] The Shift News make it a point to remove/refuse advertising from government entities and politicians.
- [9] The Partit Laburista (PL), in government, and the Partit Nazzjonalista (PN), both owns and operates TV and radio station, online news portals and publish newspapers. They are the only two political parties with representation in parliament.
- [10] Audience Assessment Weekly Average Percentage Audience Share by TV station: TVM (PSM) - 29.5%; TVM News (PSM) - 7.3%; ONE TV - 17.5%; NET TV - 6.5%.: Total: 60.8%. (Fsadni & Associates, 2022, p. 17)
- [11] The guidelines were published on February 25 to cover the campaign period, from February 28 to March 26, 2022.
- [12] Just as in the case of the Media Development Literacy Board, the Department of Information's landing page for this committee produces a blank page, with no names or contacts.
- [13] The other four times that "disinformation" is referenced in the document is once in a definition of a hybrid attack and 3 times in reference titles.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Louiselle</i>	<i>Vassallo</i>	<i>Senior Associate Academic</i>	<i>Faculty of Media and Knowledge Sciences (MAKS), University of Malta</i>	X

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>Brenda</i>	<i>Murphy</i>	<i>Associate Professor/Chairperson</i>	<i>University of Malta/Mediating Women; Balancing the Media (NGO)</i>
<i>Joseph</i>	<i>Mizzi</i>	<i>Publisher</i>	<i>Midsea Books</i>
<i>Matthew</i>	<i>Xuereb</i>	<i>Assistant Editor/President</i>	<i>Times of Malta/IĠM - L-Istitut tal-Ġurnalisti Maltin (Institute of Maltese Journalists)</i>
<i>Anna</i>	<i>Borg</i>	<i>President/Senior Lecturer</i>	<i>Malta Women's Lobby/University of Malta</i>
<i>George</i>	<i>Vital Zammit</i>	<i>Senior Lecturer, Political Commentator</i>	<i>Faculty of Economics, Management & Accountancy, University of Malta</i>

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