



Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

Country report: Malta

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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States and Candidate Countries of the European Union, and considering both online and offline news environments. This narrative report has been produced within the framework of the implementation of the MPM carried out in 2019, under a project financed by a preparatory action of the European Parliament. The implementation was conducted in 28 EU Member States, Albania and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological note

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 was carried out centrally by the CMPF team. The research is based on a standardised questionnaire and apposite guidelines that were developed by the CMPF.

In Malta the CMPF partnered with Louiselle Vassallo (University of Malta), who conducted the data collection, scored and commented the variables in the questionnaire and interviewed relevant experts. The report was reviewed by 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 Annex II for the list of experts).

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic 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 below).

Basic Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for people with disabilities
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Access to media for women
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Media literacy

Table 1: Areas and Indicators of the Media Pluralism Monitor

The Monitor does not consider the digital dimension to be an isolated area but rather as intertwined with traditional media and existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor allows for an extraction of a digital-specific risk score and the report contains a specific analysis of risks related to the digital news environment.

The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk.

On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, the MPM2020 scores may not be fully comparable with MPM2017 ones. For more details, see the CMPF report on MPM2020, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

Malta is a Mediterranean island state situated between North Africa and Sicily. The three largest islands that make up the archipelago – Malta, Gozo and Comino – are inhabited. Covering a landmass area of just 315 km², and with a total population of 493,559 (NSO, 2019), it is the smallest EU Member State. Maltese and English are the country's two official languages, with Maltese also being the national language.

Although Malta had various foreign rulers through the ages, the British legacy is strong as, prior to obtaining independence in 1964, the island had been a colony of the United Kingdom for 164 years.

There are no legally recognised minorities in Malta, but in view of its geographical location, the country has an influx of migrants by sea, mainly asylum seekers. Often, the island would not be the migrants' desired destination, as they ultimately would have wanted to reach mainland Europe. According to the latest AIDA country report, Malta had 2,045 asylum applicants in 2018, most of them being from Syria (460), Somalia (311), Libya (305) and Sudan (171). (AIDA, 2018, p. 7) The number of immigrant/refugee arrivals by boat has declined in the past few years, but migration to the island is still perceived to be one of the most important issues that the country is facing, with 71% of the respondents for the Standard Eurobarometer 92 (2020) highlighting immigration as the main issue of concern.

Malta is a parliamentary democracy in which two major political parties alternate in power. Since 2013, the country has been governed by the traditionally left-wing Labour Party (*Partit Laburista*, PL). Ex-Prime Minister Joseph Muscat won a second term in office after having called an early snap parliamentary election on 3rd June 2017. The Nationalist Party (*Partit Nazzjonalista*, PN) remains in opposition, and in spite of recent political unrest, mainly in connection with reported government corruption, the PN has been losing popularity at an exponential rate, providing a weak opposition to the PL government. These two political parties (PL and PN) are also key players in the media market, since they both own and manage multiple media platforms, covering TV, radio, print and online outlets. Thus, they are actively contributing towards shaping the working environment for journalists and being a major influence on public discourse.

In recent years, Malta has enjoyed a strong economy, with the latest unemployment rate at a low 3.4%. (NSO, December 2019) The Standard Eurobarometer (92, 2020) National Report, however, shows a sharp drop in the Maltese people's trust in the strength of the country's democracy, with 48 percent saying they were satisfied, or fairly satisfied, with the situation and 46 percent citing dissatisfaction, in contrast to the 2018 findings for which 71 percent of respondents claimed that they were satisfied, and 24% saying that they were dissatisfied. The survey also revealed a significant drop in people's positive perception of the country, with 58 percent perceiving the situation to be "good or quite good", as opposed to the 87 percent scored in 2018. The report suggests that the timing of the data collection, carried out between November 14 and 28, 2019, could have left an impact on the responses of participants, since this was a period during which Malta was experiencing a shift in the political scenario, with quasi-daily protests in the capital city, following new revelations and arrests in relation to the assassination of investigative journalist Daphne Caruana Galizia in 2017.

In November 2019, following the arrest of local businessman, and alleged mastermind, Yorgen Fenech, civil society protests grew substantially, and people were asking for the resignation of Joseph Muscat, amongst others. Fenech had been named as the UBO of 17Black, the Dubai registered company who, allegedly, was to pay Prime Minister Muscat's chief of staff, Keith Schembri and then Minister Konrad Mizzi kickbacks in relation to a much disputed energy deal. Muscat, who announced his resignation on December 1, 2019, and left office on January 12, 2020, had to cut his tenure short, following the arrest of Schembri, his chief of staff, in connection with the Caruana Galizia investigation. Mizzi, too, resigned following Schembri's arrest, although he was never implicated directly, or arrested.

At the time of this report's completion, the compilation of evidence against Yorgen Fenech is still ongoing, as is an independent public inquiry looking into whether Caruana Galizia's assassination could have been prevented by the state. The latter had its first hearing on December 6, 2019, following a two year campaign by the family. The state had argued that a public inquiry would have had a negative effect on ongoing investigations. Pressure for the inquiry to commence was also made by the Council of Europe. In May 2019, a report by the committee on Legal Affairs and Human Rights

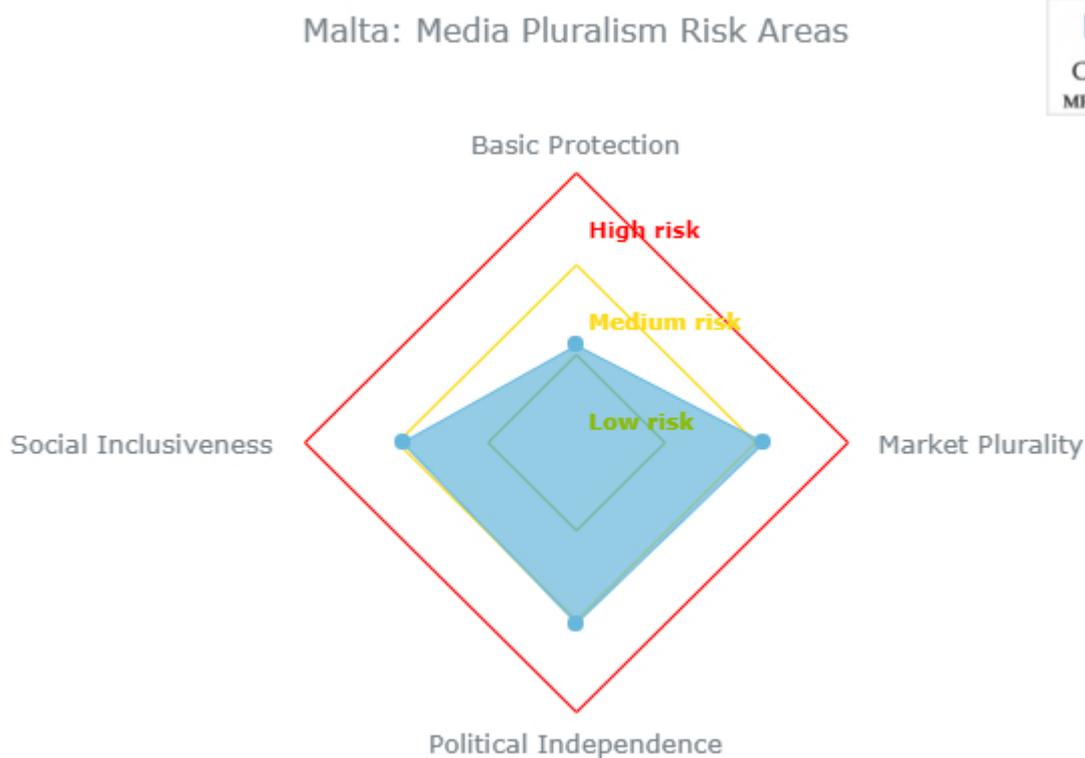
of the Parliamentary Assembly of the Council of Europe (PACE) concluded that the rule of law in Malta was “seriously undermined by the extreme weakness of its system of checks and balances,” and called on Malta, amongst other things, to urgently implement, in their entirety, reforms recommended by Council of Europe constitutional experts (the Venice Commission) and its anti-corruption body (GRECO). The committee also listed a series of “serious concerns” over the investigations into the journalist’s murder, and demanded the setting up of an independent public inquiry into the question, giving the country a three month deadline.

Eurobarometer (92, 2020) shows that, overall, there has been a general reduction of trust in public institutions. The data reveals that, at the time of writing, 51 percent claim that they trust the government, a 12 point drop when compared to the 63 percent score in 2018, while only 44 percent of respondents say that they trust parliament, down from 59 percent. Trust in European institutions remains as it was, at times improving in standing among Maltese respondents.

Respondents in Malta also registered low trust in the media, with only 30 percent saying Maltese media provided trustworthy information, in contrast to 56 percent in the whole of the EU. Additionally, only 12 percent believe that the media in Malta provide information free from political or commercial pressure, and that public service media are free from political pressure, in contrast to 39 percent for the EU. Malta also registered an increase in the use of the internet as a primary source of news on national political matters, scoring 52 percent, up 12 points from the 40 percent registered in 2018, more than double the average for the EU, which is 24 percent. Some 82 percent claim that Malta has a problem with fake news and misrepresentation, whilst 87 percent claim that fake news is a problem for democracy in general.

Overall, TV is still by far the medium that is most used with 81 percent of the population following television daily or almost daily (Eurobarometer 92, 2020). The most popular channel is TVM (PSM) with 34.79 percent, followed by ONE (owned by the Labour Party) with 20.12 percent and Net TV (owned by the Nationalist Party) with 7.96 percent. Beside these, just under one third of the population (30.97 percent) follows a foreign TV station (Broadcasting Authority Malta, November 2019).

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



Overall, the results of the MPM2020 for Malta indicates a medium risk for media pluralism. Additionally, several individual indicators point to high or very high risk levels.

Since the Basic Protection area incorporates aspects considered fundamental to the conditions needed in the journalistic profession and to freedom of expression, the fact that a medium risk has been noted should be of concern. The most risk-increasing factors relate to deficiencies in the effective implementation of the Freedom of Information Act, lack of transparency in the treatment of whistleblowers, appointment procedures for the Broadcasting Authority (as well as the absence of an overall media authority), as well as ongoing developments in the case of the the assassination of investigative journalist, Daphne Caruana Galizia, and the overall effect this has had on the local media landscape.

The highest-scoring risk indicators are: political independence of the media, independence of PSM governance and funding, editorial autonomy, news media concentration, online platforms concentration and competition enforcement, commercial and owner influence over editorial content, access to media for minorities, for people with disabilities and for women.

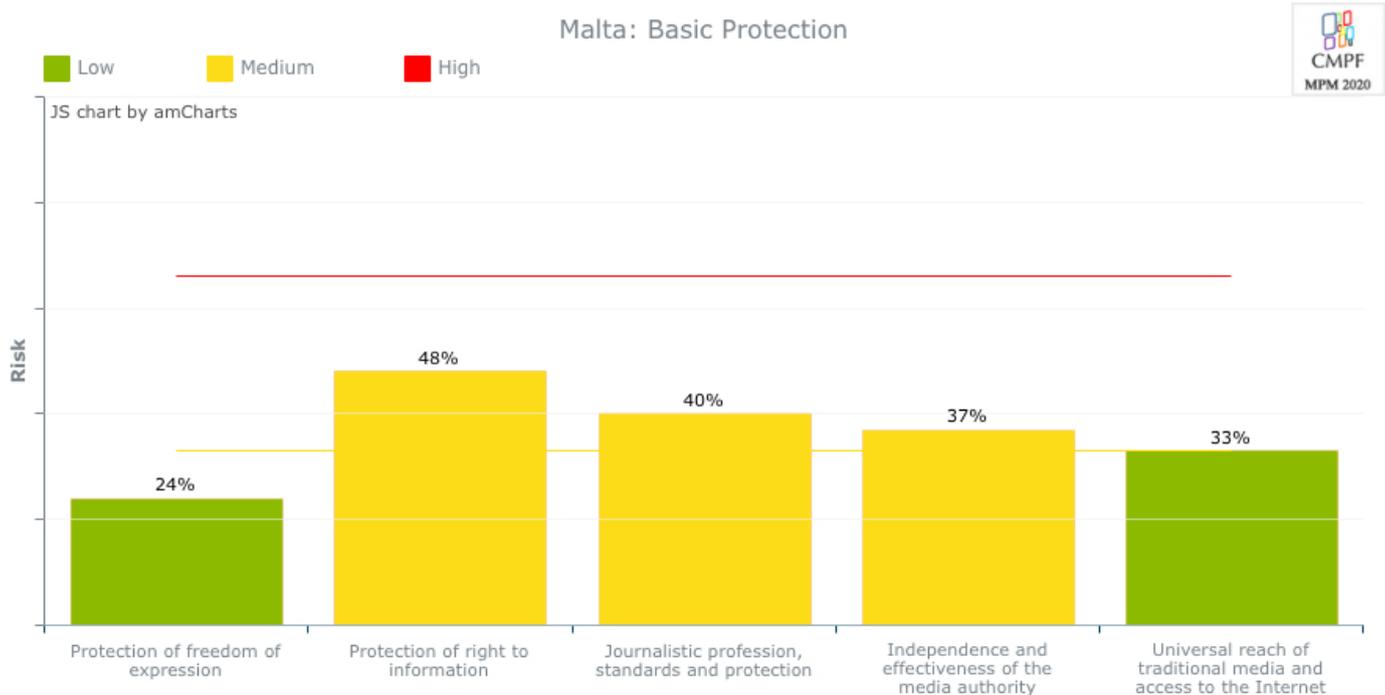
Media ownership is, by and large, transparent, since the two main political parties openly operate two of the largest media groups. However, this has a negative impact on editorial autonomy since it follows that ownership has a direct and vested interest in editorial direction. Additionally, transparent data on revenues is not publicly available, and only general information, as required by national company law may be accessed.

In spite of the fact that migration is one of the main issues dominating public as well as political debate, it is of concern that access to the media for minorities is not addressed, neither implemented, and research in this area is practically inexistent. Added to this, is the lack of equal representation of women, both in terms of participation and visibility, as well as experts in current affairs content, and of persons with disabilities.

As reported in the previous MPM, Malta is yet to implement a comprehensive media policy, and has limited itself to a digital policy, whose purpose is to raise awareness within the education framework in Malta.

3.1. Basic Protection (36% - medium risk)

The Basic 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 competence to regulate the media sector, and the reach of traditional media and access to the Internet.



The overall risk level of the Basic Protection area is medium, which is the same as for the MPM 2018.

The **Protection of Freedom of Expression** indicator reaches a relatively low risk score at 24%, and is also identical to the score obtained in MPM2017. Almost two and a half years later, the chilling effect that the assassination of the journalist Daphne Caruana Galizia had on the media in Malta, is still being felt, even if a number of media outlets, both legacy and digital, have since risen to the occasion and produced some sterling work. It is also worth noting that, just like Caruana Galizia, independent media platforms, like The Shift News, Times of Malta, The Malta Independent and political blogger Manuel Delia, are still being served with Strategic Lawsuits against Public Participation (SLAPP) actions lodged in third countries.

Freedom of expression is embedded in the Maltese Constitution, and Malta has ratified the relevant conventions that guarantee freedom of expression, even if with reservations, more specifically restrictions on the political activity of aliens, and the preclusion of public officers from political discussion or other political activity during working hours or on the premises. In reality, the latter is not entirely observed, as has been revealed during a number of testimonies given by state employees, during hearings of the recently instituted public inquiry into the assassination of Caruana Galizia.

In April 2018, the Maltese Parliament approved the updated Media and Defamation Act which, amongst other reforms, led to the abrogation of criminal libel, erased all pending criminal libel proceedings, abolished precautionary warrants for seizure in defamation cases, and removed the possibility of one individual filing multiple libel suits on multiple stories dealing with the same allegedly libellous claim. The law is still subject to criticism, in particular in view of the fact that editors need to register and submit personal details with a 'Media Registrar' who is, in turn, selected and appointed by the Prime Minister.

The **Protection of the Right to Information** indicator scores a medium risk at 48%. The Freedom and Information

Act, which was brought fully into force in 2012, on paper, guarantees access to information. This said, journalists often encounter difficulties when requesting government information, which include unnecessary delays, no reply scenarios, and the application of diversionary tactics. One particular newsroom reported that 80% of requests made to government entities remained unanswered.

Furthermore, the Freedom of Information Act lists the following as eligible applicants for information requests: Maltese citizens, EU citizens and people who have resided in Malta for a period of at least five years, thus excluding non-EU and non resident journalists, immigrants and refugees, amongst others.

Additionally, of concern is the weak legislation on the protection of whistle-blowers. The Protection of the Whistle-blower Act, which came into force in September 2013, does not protect whistle-blowers if they fail to first resort to internal reporting procedures, or if they report to the press or other media, even when it is evident that this was not a possibility, as was the case of the FIAU (Financial Intelligence Analysis Unit) whistle-blower, who was denied such status in March 2018 for failing “to act in line with the dispositions of Protection of the Whistleblower Act” (Times of Malta, March 24, 2018).

The **Journalistic Profession, Standards and Protection** indicator scores a medium risk at 40%.

Given ongoing developments and revelations in connection with in the Caruana Galizia case, as well as continuing investigations by independent journalists into high level corruption, it is safe to say that those in the profession feel threatened and this, in turn, has an impact on media’s capacity to operate freely in Malta. Additionally, investigative journalists critical of the state, are often the subject to hate campaigns run on state sanctioned online hate groups, which were revealed following an investigation by the independent online platform The Shift News.

In Malta, there are no legal obstacles which prevent a person from working as a journalist and the protection of sources is explicitly recognised by the law and is generally enforced in practice. On the other hand, journalists’ working conditions are affected by the decay of the media business model, given the size of the island and the number of media outlets in operation, as well as being negatively effected by digital transformation.

Moreover, the Malta Institute of Journalists, which is the only professional journalists’ organisation in the country, is generally not considered as being effective in safeguarding editorial independence, and does not seem to have a strong enough voice in ensuring the overall well-being of its members.

The **Independence and the Effectiveness of the Media Authority** indicator scores a medium risk at 37%.

There is no overall media authority in Malta, but only The Broadcasting Authority, which monitors and regulates radio and television broadcasting in Malta. All five members members of the board are political appointees, and are selected by the two main political parties, that is the party in government and the opposition, who each appoint two members, whilst the chairperson is generally chosen by mutual agreement of the same two parties.

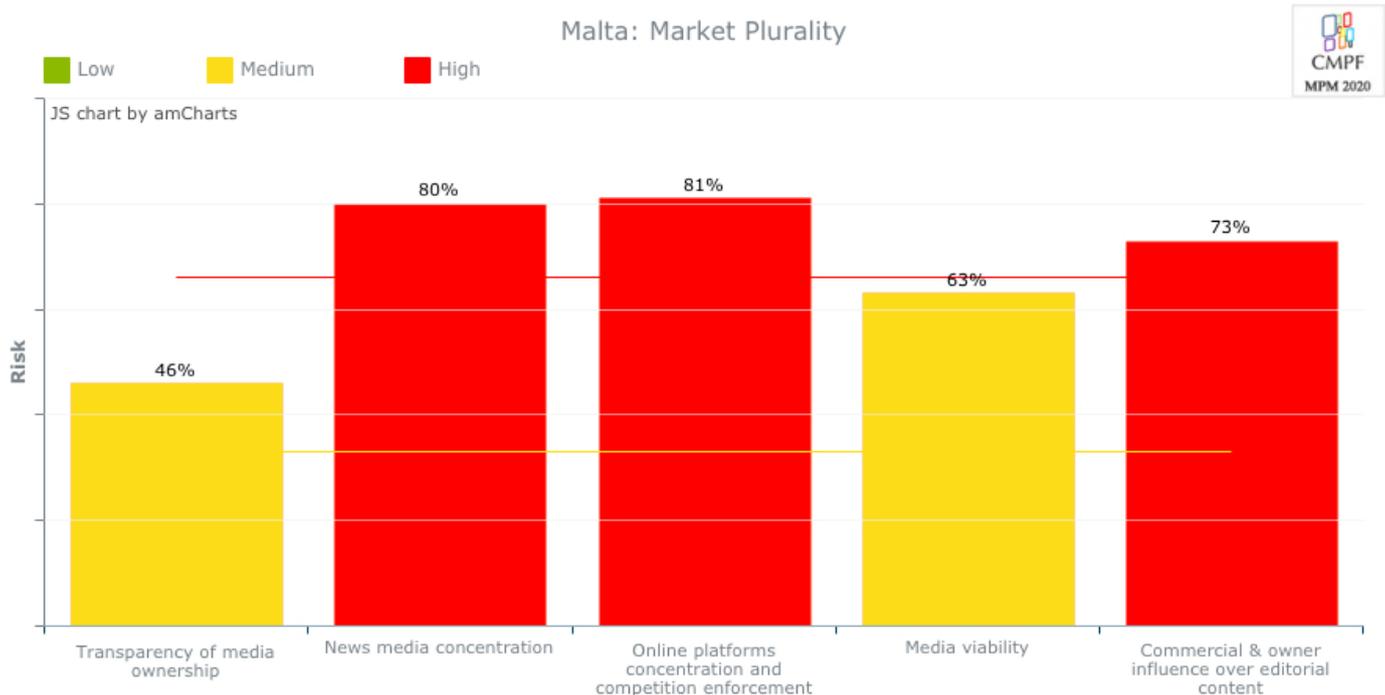
The main operation of this authority involves the monitoring and regulation of the PSM - Public Broadcasting Services (PBS), the general outlook being that the other two main broadcasting outlets, Super One Radio and One TV (owned by the Labour Party, in government), and Net TV and Net FM (owned by the Nationalist Party - in opposition), tend to balance themselves out editorially.

The fifth indicator in this area, **Universal Reach of Traditional Media and Access to the Internet**, scores a low risk at 33%, which is, nonetheless, very close to the medium risk level. The risk score reflects a concentration in the internet service provider (ISP) market, with the two largest ISPs holding, between them, approximately 95% of internet subscriptions. On a positive note, Malta enjoys almost 100% broadband coverage of 30 Mbps, a Digital Agenda (DAE) target which it had already achieved during the last MPM.

3.2. Market Plurality (69% - high risk)

The Market Plurality indicators examine the existence and effectiveness of provisions on transparency of media ownership and the existence and effectiveness of regulation or self-regulation against commercial & owner influence on editorial content. In addition, they assess the risks related to market concentration in the production as well as in distribution of news: as for production, considering separately horizontal concentration in each sector and cross-media concentration; as for distribution, assessing the role of online platforms as gateways to news, the concentration of online advertising market ,

and the role of competition enforcement and regulatory safeguards in protecting information pluralism. Moreover, they seek to evaluate the viability of the news media market.



Malta scores a high risk in the area of **Market Plurality**, with three indicators in the high risk band: News media concentration, Online platforms concentration and competition enforcement, and Commercial and owner influence over editorial content.

Transparency of media ownership is assessed as a medium risk at 46%. In view of the fact that political parties openly own and manage multiple media platforms, the public is, by and large, well aware of who owns which media in Malta. On the other hand, there are no specific legal obligations for media companies to publish their ownership structures in a manner that would make this information easily accessible to the public. Media companies must register with the Registrar of Companies (RoC), like any other Maltese company, and submit details, including the name, identity card number and residence of all shareholders. The registry is available online, but the details that are accessible to the public for free are very limited. Also, the Broadcasting Authority has right to obtain, from the license holders, any type of information it considers necessary, but does not publish this information. Additionally, article 51(1) of the Press Act requires every newspaper to publish the name of its publisher. While the readers might become aware of the name of the company that owns a particular newspaper, this disclosure does not ensure transparency of the actual ownership structure. Such an obligation covers newspapers only; other publications, such as magazines, do not fall under the scope of this provision.

The **News media concentration** indicator scores a high risk at 80%.

The media legislation, namely the Broadcasting Act, contains specific limitations to prevent a high degree of horizontal concentration of ownership in the audio-visual media sector. Data on the market share of individual broadcasters is not available, however Malta shows that the Top4 media owners, for both television and radio, have more than 50% of the audience share, as highlighted in the latest audience assessment report published by the Broadcasting Authority (Broadcasting Authority Malta 2020). The print market is unregulated and no data is collected with regard to both the market share, as well as circulation and audience/readership numbers. Thus, a thorough assessment of this sector is not possible.

The highest risk indicator under this category is **Online platforms concentration and competition enforcement**, with score of 81%.

This result is mainly in view of the fact that there is as a lack of available data pertaining to advertising/market shares and audience concentration, as well as no specific regulation for this market, but only generic regulation in relation to

the Malta Competition and Consumer Affairs Authority. Neither the Competition Act, which prohibits the abuse of a dominant position, nor the Control of Concentrations Regulations, which regulates M&As, lay down provisions that would allow the competent authorities to enforce competition rules in a way that takes account of the specificities of the media sector. Thus, since there is no administrative authority or judicial body overseeing the sector, a high degree of concentration in the advertising market may not be prevented. Furthermore, the PSM is in an advantageous position of generating revenue by selling online advertising space and airtime packages, as well as receiving state funding, whilst private media entities struggle to make ends meet, and are having to diversify their business models in order to survive. The **Media Viability** indicator scores a medium risk at 63%.

Very little data is available regarding revenues in all sectors. Neither the Broadcasting Authority, nor the Malta Competition and Consumer Affairs Authority collect this information. However, the general feedback from all legacy media sectors is that advertising revenues have decreased, in view of increased spending on digital platforms, and especially since advertising agencies and businesses are allocating parts of their budgets to social media platforms.

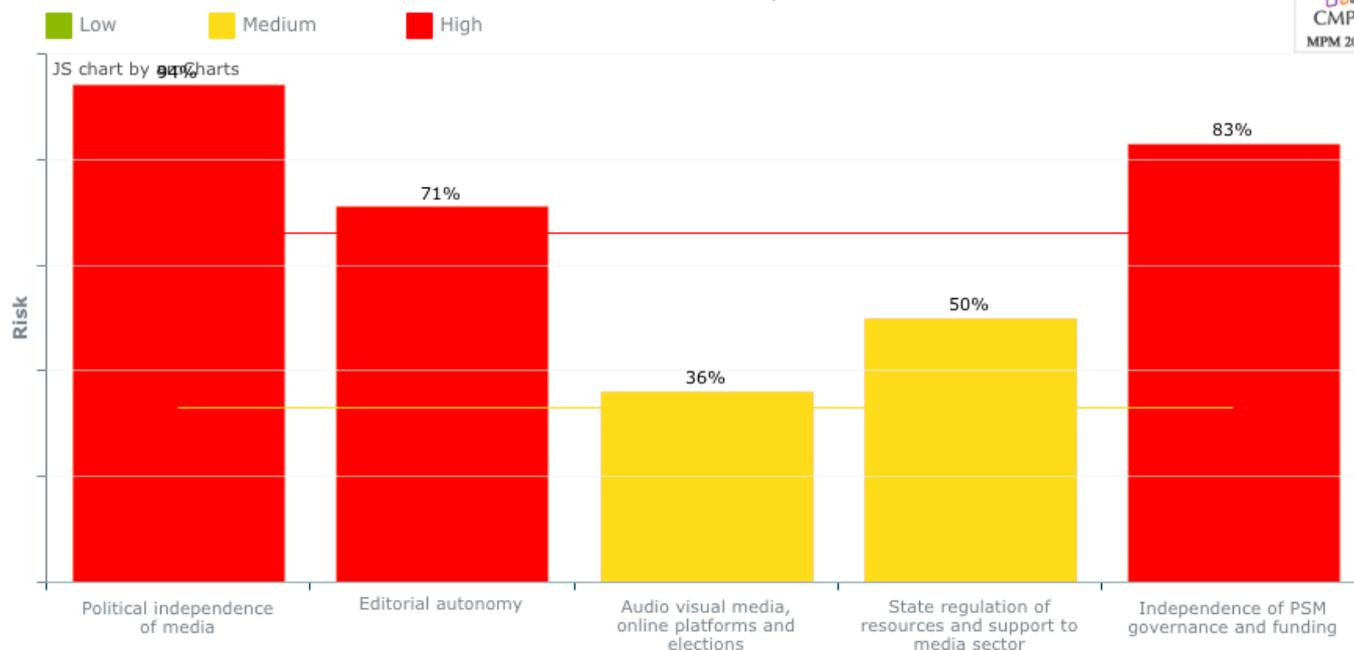
Additionally, no data regarding an increase or decrease in the employment of journalists is available, and journalists employed by legacy media outlets, that are now providing online content, are now also trained in audiovisual techniques so as to provide visual content for their digital platforms. In the case of digital native news media, one might dare to consider an increase, both in employment and revenues, in view of the fact that they are relatively new to the market. Sources of revenue, other than traditional revenue streams, include donation and/or subscription schemes, whilst political party owned media frequently organise fund-raisers, as well as large and small scale events to boost their income.

The **Commercial and owner influence over editorial content** indicator scores a high risk of 73%. There are no specific mechanisms granting social protection to journalists in the case of changes of ownership or editorial line, and although there is the Malta Institute for Journalists (IGM), it cannot be considered as a specialised trade union representing journalists and safeguarding the working conditions of journalists. There are also no clear safety measures to prevent the influence of commercial and/or political interests over the appointments and dismissals of editors-in-chief, especially since a number of media outlets are actually owned by political parties. It is problematic that party media are not held to standards of fair and unbiased reporting, thus exacerbating the situation of one-sided partisanship with damaging effects on the wider Maltese media landscape.

The IGM guidelines list as a breach of ethics any form of commission-based publicity and editorial favours, yet, as expert opinion agrees, it is common knowledge that particulate entities do apply pressure on newsrooms, threatening to cancel advertising revenue. There are, however, a number of independent media outlets who have very strict procedures which they implement with commitment, since they value credibility over loss of income.

3.3. Political Independence (67% - 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 public service media. Furthermore, the area concerns with the existence and effectiveness of (self)regulation in ensuring editorial independence and availability of plural political information and viewpoints, in particular during electoral periods.



Unlike previous findings, where the overall score was medium risk, this time round, the Political Independence area has touched the high risk band, with three indicators being at high risk: **Political independence of media**, **Editorial autonomy**, and the **Independence of PSM governance and funding**, the same three indicators that were deemed high risk in previous MPMs.

The **Political independence of media** indicator scores a very high 94% risk level.

There is no law that makes government office incompatible with media ownership. Political parties, including those in government, is expressly permitted to own, control or be editorially responsible for nationwide television and radio services, under certain conditions (Broadcasting Act, Part III, Article 10, paragraph 4D). The two main political parties represented in the House of Representatives own, control and manage their own media enterprises. The party in government, the Labour Party, owns One TV Channel, One Radio Channel, the commercial music radio channel KISS, the now discontinued weekly *Il-Kulhadd* (Everybody), whose last online post dates to November 2019, and the online news portal onenews.com.mt.

The Nationalist Party, in opposition, owns NET TV, Radio 101, a daily newspaper (*In-Nazzjon Taghna - Our Nation*), a weekly (*Il-Mument - The Moment*), and a news portal netnew.com.mt (formerly maltarightnow.com).

Added to this, the daily and weekly newspapers, *L-Orizzont* (The Horizon) and *It-Torca* (The Torch), and the online news portal iNewsmalta.com, are owned by the General Workers Union (GWU), which is closely associated with the Labour Party,

Furthermore, the ex-Prime Minister's (Joseph Muscat) Chief of Staff, Keith Schembri, had commercial outlets (Kasco Group of Companies) that supplied local media houses with, for example, newsprint. As revealed by Daphne Caruana Galizia in 2017, Schembri also had a business relationship with the ex-Times of Malta General Manager, Adrian Hillman, who resigned from his post following the revelations of his business connection with Schembri, and after an internal inquiry was conducted by The Times of Malta, which was never published.

Some might argue that, since ownership of the media is widely known and accepted, then editorial bias is transparent and, thus, consumers may evaluate content through an informed position. However, one would need to analyse the reach of all media outlets to better evaluate whether diverse political viewpoint are being represented, especially since the media of the party in government have a strong following, when compared to the media owned by the opposition as well as independent media outlets. It is also of concern that there is state influence over the PSM, since it relies of state funding and key appointments are made directly by the Minister responsible.

The **Editorial autonomy** indicator also scores a high risk 71%.

The are no common regulatory safeguards when it comes to appointing or dismissing editors, and it follows that, since

political parties own multiple media outlets, political influence in such appointments or dismissals is inevitable. The Institute of Maltese Journalists (IGM) have an outdated code of ethics, which has not, to date, been updated and is still under revision, although, as a member of the International Federation of Journalists (IFJ), the IGM has adopted the Global Charter of Ethics for Journalists. Some news outlets have internal codes of conduct which are not publicly available. It is largely acknowledged that political influence is prevalent, especially in view of the fact that Malta is small and overcrowded, so proximity tends to be an issue.

Additionally, a common view, which tends to be accepted as an inevitable scenario, is that the PSM is a mouthpiece for the government. One recent case of editorial bias is the scandal involving a local passport agent and a Paceville impresario boasting of ministerial friendships, uncovered by a French news crew in an edition of *Enquete exclusive*, entitled "Malte, joyau de la Mediterranee et paradis de la corruption", broadcast on 22/09/2019. Most major independent news outlets reported aspects uncovered during this documentary, yet the PSM only reported the government reaction and denial to the allegations.

The **Audio Visual Media, Online Platforms and Elections** indicator scores a medium risk at 36%.

When it comes to broadcasting, fair representation of different political actors and diverse viewpoints is mandated by law, and overseen by the Broadcasting Authority (BA). The BA does not actively monitor campaigns, but issues the guidelines to TV and Radio stations, and limits itself to acting upon any complaints that are submitted, generally by the party in opposition, smaller parties and independent candidates, as well as issuing fines if necessary. The BA also tends to keep more of a watchful eye on the PSM during election campaign periods. Smaller parties have argued that the Broadcasting Authority had denied smaller political parties the possibility of debating the two main parties and, often, debates tend to be characterised by confrontations between representatives of the two main political parties. Experts argue that the allocation of airtime during election campaigns designed by the BA is obsolete, especially in view of the fact that TV stations have online portals and a social media presence, which in turn has altered the realities of representation as addressed by the same BA in the 1990s.

Political advertising on nationwide broadcast channels has to be clearly marked. The online scenario is somewhat different, since there is no mechanism that regulates the transparency of political advertising, and subliminal messaging is not avoidable. Candidates tend to be more heavily regulated in terms of campaign spending, unlike political parties who limit themselves to annual accounts which are not detailed enough for campaign spending to be extrapolated. Although political parties submit an annual expenditure report to the electoral commission, the sums outlined are generic, and there is no breakdown in relation to campaigning, but a lump sum instead. These amounts, are likely to be in relation to campaign events and activities (like mass meetings and locality events) and not strictly in relation to advertising, although this is not verifiable.

Furthermore, it is not uncommon for the party in government to run extensive marketing campaigns, promoting state initiatives. These are, naturally, publicly funded, and spikes in spending tend to coincide during the annual budget months as well as electoral campaign months.

The **State Regulation of Resources and Support for the Media Sector** indicator scores a medium risk at 50%.

The Government in Malta does not provide any subsidies to privately owned media, since the press sector is considered as any other commercial venture. The exception, of course, is the PSM. Private media outlets are subsidised by their owners, which include institutions, like Catholic Church or political parties. The state may also subsidise certain media outlets, and not others, but the amount of advertising booked for particular campaigns in relation to Ministries and government agencies.

Independent media outlets are also showing concern about the fact that government spending on social media is unregulated, and that there is no stipulated limit on the spend. Currently, there is no legal framework for, nor is there complete transparency in the allocation of state advertising, and, as things stand, there is no safeguard to stop the government from spending all its advertising budget on, for example, Facebook and nothing on local media organisations, or, worse still, from excluding particular media houses from the advertising budget when a media house gets too critical. Added to this, since certain ministries do not have their own social media pages, taxpayers' money is being used to directly fund ministers' promotional campaigns on their individual platforms.

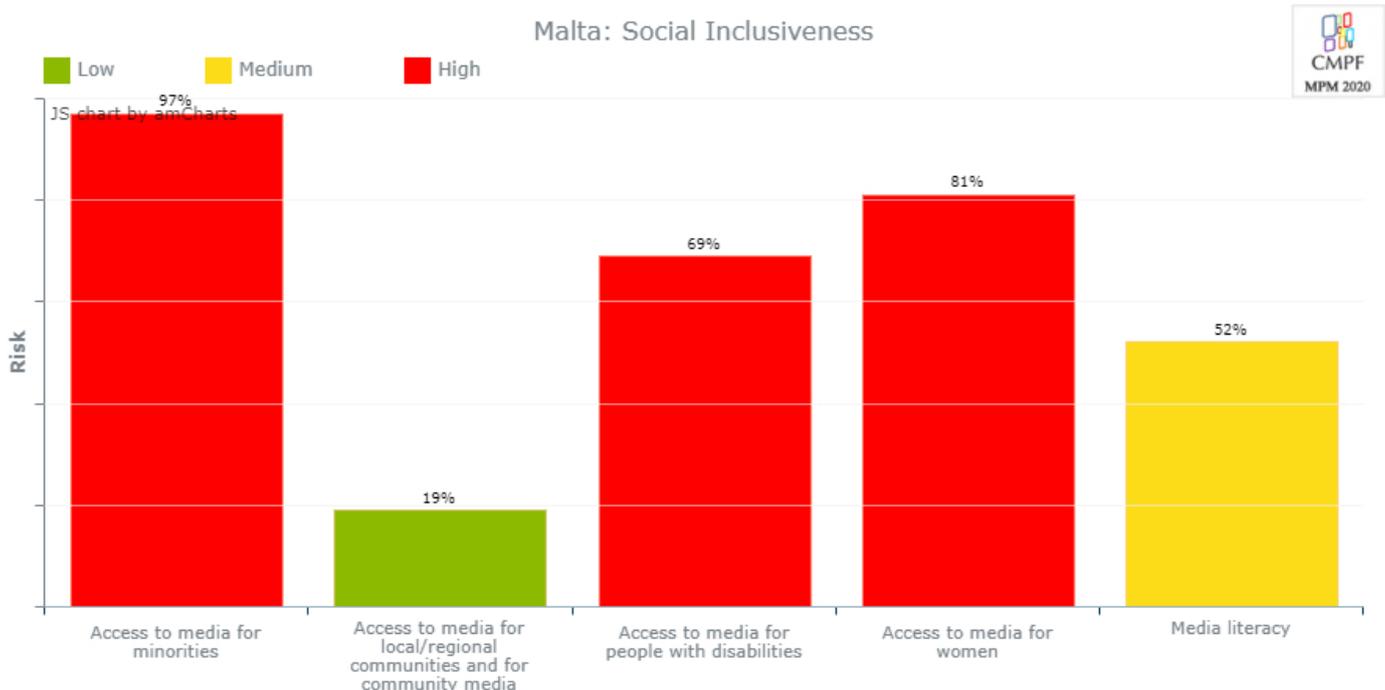
Furthermore, as mentioned above, the government uses state advertising throughout the year but especially during pre-election months, as form of indirect political advertising.

The **Independence of PSM Governance and Funding** indicator scores a high risk 83%.

The PSM is particularly vulnerable to political influence. The government has a significant and direct influence on the PSM in view of the fact that members of its Board of Directors as well as its Editorial board are appointed by the state. Additionally, key decision making personnel are also appointed by the Minister concerned. The government also partially funds the PSM through a direct grant, which is transparent, but the amount of the grant is decided by the government at its own discretion. At the same time, the PSM is free to sell advertising under the same conditions as other independent media outlets, giving it an unfair advantage when one considers the strong presence it has in terms of audience and readership numbers.

3.4. Social Inclusiveness (64% - medium risk)

The Social Inclusiveness indicators are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country's media literacy environment, as well as the digital skills of the overall population.



Overall, the Social Inclusiveness area scores a medium risk, with three indicators being in the high-risk band: access to media for minorities, access to media for people with disabilities, and access to media for women. Media literacy scores a medium risk, whilst access to media for local/ regional communities and for community media scores a very low risk.

The **Access to Media for Minorities** indicator acquires the maximum high risk score of 97%.

There are no legally recognised minorities in Malta. Subsequently, there are no specific provisions relating to access to airtime for such groups. However one cannot ignore the fact that there are minorities in Malta and, consequently, their lack of visibility on local media is not conducive to promoting acceptance and integration. Very little research has been conducted in this field, in spite of increased migration and more and more non EU nationals taking up residency in Malta. A study conducted in 2012 by SOS Malta notes the lack of representation, with 69% of respondents stating that there is inadequate or non-existent coverage, and although this is dated, a scan of local media platforms would consolidate this result. Additionally, experts agree that representation is inadequate. On rare occasions, though, migrants

or their representatives, through NGOs, are invited to participate in current affairs programmes which touch on topics directly related to them.

Ultimately, the risk factor stems from the lack of comprehensive research on the media representation of different minorities. This is leading to marginalisation, propagated by a racist narrative, especially on social media, and populist and nationalistic statements by politicians who have disproportionate media coverage when compared to such communities.

Access to Media for Local/Regional Communities and for Community Media scores the lowest risk in this area at 19%.

There are no regional or local media outlets in Malta, but there is also no risk related to this factor due to the geographical size of the country. Community radio stations, on the other hand, are explicitly recognised by the law and are widely present in the country.

The **Access to Media for People with Disabilities** indicator scores a high risk at 69%.

Although Malta has a National Disability Strategy, based on the National Policy on the Rights of Persons with Disability, Malta still has a long way to go in terms of accessibility in this field. The Broadcasting Act (Article 16J, 3) encourages broadcasters to aim at gradually making their services accessible to people with visual or hearing disabilities, however, nothing obliges media outlets to implement such measures. Furthermore, requirements in relation to standards and practices applicable to disability and its portrayal in the broadcasting media, also made by the Broadcasting Authority in virtue of Article 20(3) of the Broadcasting Act, suggest that broadcasters should recruit disabled persons to work among their staff. However, all these requirements and recommendations are not effectively implemented. No audio descriptions are available for blind people, possibly due to lack of expertise as well as budgetary reasons. Additionally, support available for people with hearing impairments is limited. Rare exceptions include political broadcasts or speeches, or the more recent daily briefings on Covid19 updates broadcast by the PSM, where sign language is included.

The Malta National Disability Strategy outlines a number of initiatives in relation to media and training for media practitioners, with a whole section dedicated to “access to information | audio, visual and literary media”, however, apart from being undated, it does not indicate any timelines or target dates for implementation.

Access to media for women scores a high risk at 81%, up 21 percentage points from the previous MPM (MPM 2018, 60%),

This increased high risk score is possibly in relation to more data which has been made available. Women are underrepresented in a number of areas within the media. When it comes to Boards of Directors, the PSM has one woman out of 6 members, whilst all the other Private broadcasters have no women on their boards, except one on the One Group Board of Directors.

To date, only a small number of women have actually made it to editorial positions. Of the three primary TV stations, TVM and One TV have both, in the past, had a woman leading their newsroom, whilst Net Television has never had a woman as head of news. This is not exclusive to TV broadcasting, but to all media platforms in Malta and the percentage of women leading news organisations is dishearteningly low. At the time of publication, data obtained from the Broadcasting Authority, the Department of Information, as well as online portals of media houses concerned, shows that, overall, the number of women in top editorial positions is 18.9 percent, whilst men occupy 81.1 percent. (Vassallo, 2019)

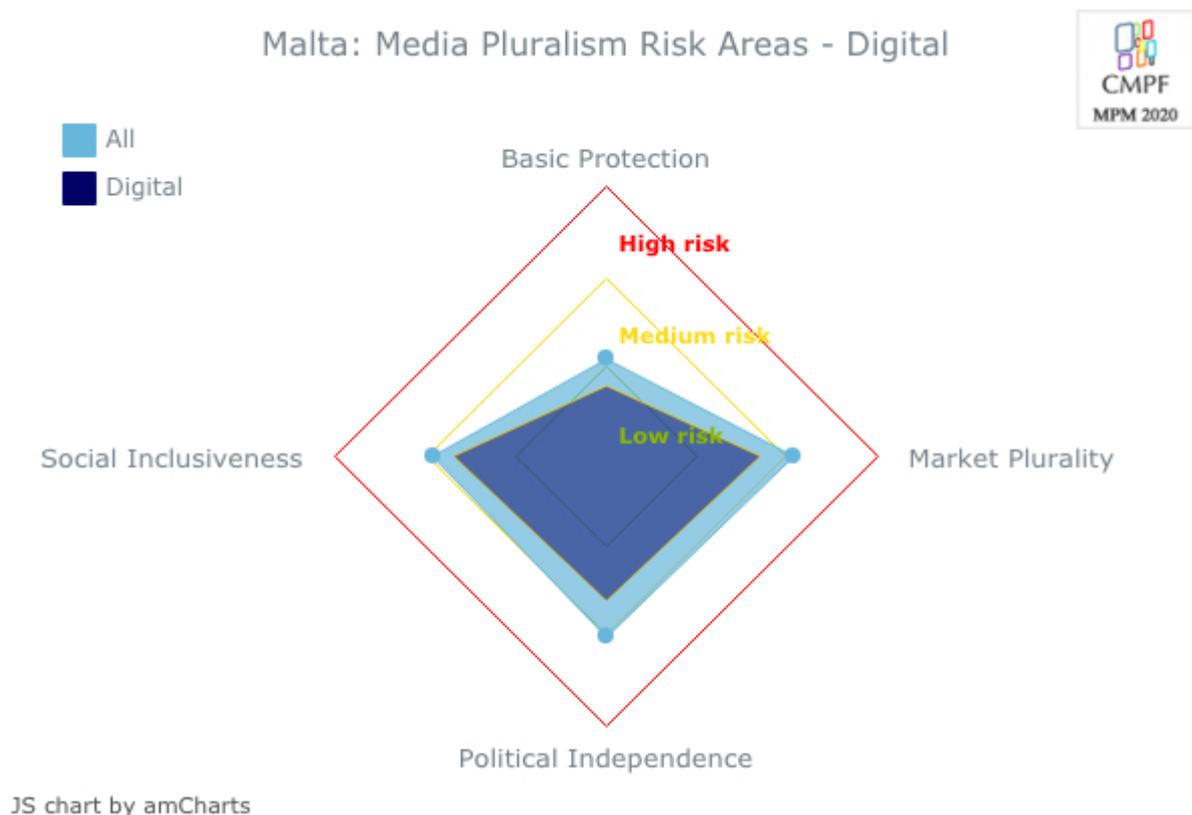
Although some independent media outlets, like The Times of Malta, Heart (ex-RTK), Newsbook, The Shift News and Lovin’Malta, make a concerted effort to have gender-balanced participation, recent studies found that women on the PSM participating in current affairs programmes totalled less than 20% during the months of January/February 2019.(Vassallo, 2019) The visual is essentially reinforcing the notion that ‘serious’ debate is predominantly the remit of men, and that women participating in this arena are the exception, unless the topic under discussion is directly related to ‘women’s issues’.

Finally, the **Media literacy indicator** scores a medium risk at 52%.

Currently there is still no official document on media literacy however there are a number of initiatives that Malta is

undertaking in connection to media literacy. The closest is a digital literacies green paper that was published by the Ministry for Education and Employment. Additionally, the Institute for Education introduced media literacy as a compulsory subject in teacher training programmes as from 2018. In the 2017/2018 academic year, media literacy was introduced as a non compulsory subject in secondary education.

4. Pluralism in the online environment: assessment of the risks



BASIC PROTECTION

Protection of freedom of expression

Freedom of expression online is not clearly defined in law and/or in the case-law in accordance with international and regional human rights standards, although Article 41(1) of the Maltese Constitution is not relevant to a specific medium, thereby enshrining freedom of expression online. The Broadcasting Act has been amended so that on-demand services fall under the scope of the same legislation, which allows for restrictions to freedom of expression, and which appear to comply with the criterion of clear definition, for example, freedom of expression of on-demand providers and restrictions to protect minors. Overall, new media are not regulated to the same extent as legacy media, although freedom of expression should be guaranteed as enshrined in Article 41(1) of the Constitution.

There is no evidence to suggest, or data to confirm or otherwise, that the State is filtering, blocking or removing online content in an arbitrary way. On the other hand, since the Malta Government is very tech savvy, monitoring and data harvesting might still be taking place, in the name of intelligence activities and security operations. Clearly, the State is in a position to lever on the affordances of platforms such as Facebook for political gain. Most ministries and public organisations consider platforms, like Facebook, to be a necessary component of public engagement.

Additionally, there is also no evidence of non-legal filters, monitoring or blocking strategies being applied by ISPs and online platforms, and it is generally accepted that local ISPs and platforms do not remove censor data.

Journalistic profession, standards and protection

Over the past two years there have been reports of DDOS attacks on independent media, particularly on platforms like *The Shift News* and *Truth Be Told*, as well as the occasional blocking of particular stories on the Times of Malta. The DDOS attacks in particular were substantial and aimed at blocking their content and rendering the sites unavailable, sometimes for days.

The level of misogyny online is evident, as seen in coordinated Facebook hate groups, as reported by *The Shift News*. Daphne Caruana Galizia herself was subject to decades of a strategic hate campaign of dehumanisation, leading up to her murder. This has been extended to any criticism levelled towards the government, as well as the leader of the opposition.

The E-Communications Regulations establish all the rules on how telecoms operators and ISPs can or cannot retain data,

that is, as legislation in compliance with articles 8 and 10 of the European Convention on Human Rights. Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 has been transposed to Maltese legislation. Malta, through national legislation, has also implemented the derogation provided for the GDPR on freedom of expression and journalistic activities in a way that complies with article 10(2) of the European Convention on Human Rights

Universal reach of traditional media and access to the Internet

The whole population is covered by broadband and at least 84% of households are subscribed to a service. Out of five ISPs, the top two hold 94.66% of the market share (MCA, 2018). Regulatory safeguards regarding net neutrality are in place and being implemented, and there are no records of restrictions on content.

MARKET PLURALITY

Transparency of media ownership

There are no specific obligations whereby media companies, including digital news media, are required to publish their ownership structures on their website or in records or documents that are accessible to the public. One of the obligations set by the Maltese Companies Act is that companies registered in Malta, thereby including digital media companies, need to register with the Maltese Registrar of Companies, including details on company ownership and structure. This information is available online, however, the details that are accessible to the public for free are very limited.

There are no specific obligations whereby media companies, including digital news media, are required to publish their ownership structures on their website or in records/documents that are accessible to the public. It is common knowledge that the two major political parties own multiple media outlets, including digital news media, however, the same scenario, as outlined above, applies.

News media concentration

In Malta, media concentration rules exist only for radio and television services. No data is available in relation to market share or audience share of digital news media, neither on the market share of the top four news media owners across different media markets.

Online platforms concentration and competition enforcement

The MPM2020 assessment for this indicator, which is focused on digital risks, is mostly related to the lack of transparent data - evaluated as a risk in itself - and to the lack of competition rules in the sector. According to the latest available data (Eurobarometer 2016), 48% people access news online directly. There is no data in relation to online advertising market share or audience share of the top four online competitors. Neither the Competition Act, which prohibits the abuse of a dominant position, nor the Control of Concentrations Regulations, which regulates M&As, lay down provisions that would allow the competent authorities to enforce competition rules in a way that takes account of the specificities of the media sector. However, consumer interests constitute one of the evaluation criteria against which the Director General of the Malta Competition and Consumer Affairs Authority may determine whether a concentration is compatible with the Regulations' provisions (Article 4(2)(d)). These criteria therefore apply also to the media sector.

A high degree of concentration in advertising market may not be prevented through the enforcement of competition rules, that take into account the specificities of the media sector, since there is no regulation in this regard.

Media viability

One might dare to consider an increase in revenues of digital native news media in view of the fact that there are only two platforms - The Shift News, which operates on donations/subscriptions and Lovin' Malta, which is fully commercial. Since both platforms mentioned have grown, the natural conclusion is that there has been an increase in the number of journalists in this sector.

Expenditure for online advertising on news media has increased over the past two years since there has been a shift from legacy media to digital platforms. Malta has boasted a strong economy over the past two (or more) years, but there is no information on whether this resulted in an increase in the overall news media advertising spend.

In terms of other sources of revenue, platforms like *the Shift* and *Truth Be Told* rely on donations and/or subscriptions. In the case of *Truth be told*, Google ads are also a source of revenue. Political party owned stations organise frequent

fund-raisers, as well as large and small scale events to boost their income.

Commercial & owner influence over editorial content

The Malta Institute of Journalists has adopted the International Federation of Journalists (IFJ) Global Charter of Ethics for Journalists, and this applies to all journalists on all platforms. Commissions or requests accepted to give undeserved publicity, and the promise of editorial favours in return for advertisements are both considered breaches of the code, yet, it is common knowledge that particular entities do apply pressure on newsrooms, threatening to cancel advertising revenue.

Additionally, Since both the Labour Party and the Nationalist Party own multiple media platforms, apart from the obvious political influence in view of their editorial policy, there is indirect pressure from the economic aspect, since party funding unofficially relies on business benefactors. Party funding has been an issue of much debate over the past years, with both major parties benefitting from poor enforcement of existing policy.

POLITICAL INDEPENDENCE

Political independence of media

Apart from 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 entertainment, popular culture, gossip and news), there are currently no other digital native media platforms in Malta - the current online news media platforms are all affiliated with traditional media platforms. They are both considered to be independent media outlets. One might consider the Truth be Told blog, operated by Manuel Delia, which also includes only news content and coverage of civil society actions, as well as guest posts about the current political situation in Malta.

Editorial autonomy

There are no specific codes of conduct or guidelines for the use of social media by journalists, apart from the generic guidelines endorsed by the Institute of Maltese Journalists (IGM), which include nothing specific with regards to social media. Some media outlets, like TVM, Newsbook and The Times, seem to have their own internal guidelines.

Audio visual media, online platforms and elections

There is no regulator for online political advertising. Strictly speaking, Maltese law demands “the two days of silence” on the day before, as well as the election day itself, wherein political advertising is prohibited on any medium, including online media. In reality, this is impossible to enforce.

When it comes to campaign spending, candidates seem to be more heavily regulated than political parties. Candidates' declaration of expenditure entails listing different expenses. However, there is no legal requirement to provide receipts as proof of expenditure, raising concerns that the current procedure lacks accountability. Additionally, political parties are not obliged to break down their electoral campaign expenditure in detail. In their submission of their annual expenditure report to the electoral commission, the sums outlined are generic and there is no breakdown in relation to campaigning, but a lump sum instead. Also, these amounts, as likely to be in relation to campaign events and activities (like mass meetings and locality events), and not strictly in relation to advertising, although this is not verifiable. Facebook Ad Library is fully operational, even if the total spend by certain individuals might be seen as unrealistic.

Although the Data Protection Act came into force in May 2018, it is common knowledge that political parties make use of previously obtained data (through membership and research) for campaigning purposes. There are no records of monitoring/fines given to political parties. An inquiry has recently been requested by the civil society NGO Repubblika, following a data leak involving a company in possession of detailed electoral registry data, allegedly linked to information held by the Labour Party.

Independence of PSM governance and funding

Apart from public funding, PBS competes with private media houses in advertising sales, and has the predominant share of the market. National Broadcasting Policy states that the PSM has to "report to the Government of Malta on an annual basis on whether, in their opinion, all amounts payable by the Government of Malta as compensation in terms of this Contract have been properly computed in accordance with the terms of this Contract; to provide full details as to the methods used in arriving at such calculations; and if it is concluded that all or any of such payments have been improperly calculated, to provide an estimate of the amounts actually due." Additionally, the Broadcasting Policy

includes a dedicated section on Digital Media, but it does not specifically outline funding strategies, except a relocation of efforts that are to migrate from loss-incurring audio-visual production, to better online content generation.

SOCIAL INCLUSIVENESS

Media Literacy

56% of the population that has basic or above basic overall digital skills, whilst 29% that has low overall digital skills. Racist hate speech is widespread on social media, oftentimes misinterpreted as "free speech", as outlined by the human rights NGO Aditus. In spite of the fact that posts on social media calling for open violence now constitute hate crimes under Maltese law, with a recently set up Hate Crimes & Speech Unit, little or no action being taken in response to these crimes. The Times of Malta noted that one fifth of the comments under one particular story threatened death or violence. The recent Easter Sunday immigration stand-off in Maltese territorial waters was but one very clear example of how racist and violent speech is used freely on social platforms and media platform comments boards, masked as "freedom of expression" under the guise of patriotism. Women are frequently targets of hate speech, especially if they are activists, whether they are campaigning for good governance or pro-choice campaigners. In contrast, Maltese people tend to be more sensitive towards people with disabilities, and, unlike cases involving racism or sexism, are quick to report hate speech to the authorities.

Educational initiatives that aim to prevent or counteract hate speech are mainly spearheaded by NGOs and News Agencies, like the 2018 #Stophate project that aimed at clamping down on Malta's online hate speech, launched through a collaboration between the Times of Malta and NGO SOS Malta.

5. Conclusions

Overall, the implementation of the 2019 Media Pluralism Monitor in Malta shows a medium risk, towards the higher end of the spectrum, for media pluralism. Each area of evaluation highlights shortcomings, in some cases scoring a very high risk, that need to be addressed, both in terms of policy, as well as in practice, for the situation to improve.

Over two and a half years have passed since the assassination of investigative journalist Daphne Caruana Galizia and, as predicted in the previous MPM, this single event has had a chilling effect on journalism and media freedom in Malta. The manner in which Caruana Galizia was executed was also meant to send a clear message to all journalists who were covering similar stories, to remain silent. Having said this, there have been a number of journalists and media outlets who have persisted in following up on her revelations, in spite of the threats that they had to face. Added to this, Malta has seen a new wave of civil society activism, culminating in large scale protests demanding truth and good governance, and which, for a change, were not led by a political party. It took two years for government to agree to a public inquiry in whether the state could have prevented Caruana Galizia's death. In November 2019, a prominent businessman, also involved in Malta's questionable energy deal, as well as with very close connections with persons from the office of the ex-Prime Minister, was arrested and accused of masterminding her death. However, both the inquiry, and the compilation of evidence for the case against the alleged mastermind have been stalled in view of the Covid19 outbreak.

With regard to Basic Protection, the situation with law on the protection of whistle-blowers has yet to be amended for whistleblowers to feel safe in coming forward with information of wrongdoing and corruption. Journalists, too, need to put in place measures that would safeguard their professional independence, to protect their working conditions as well as strengthen their position in a world in which the independent media is increasingly coming under attack. Another area of concern regards the Freedom of Information Act which, although on paper might seem to be in place, in practice has seen increasing complaints from newsrooms that the majority of requests are not being addressed adequately, or outrightly ignored.

In the Market Plurality area, as in 2018, the highest risks are largely related to the lack of monitoring and absence of data on the market shares of media companies, both legacy and digital, as well as information on newspapers' circulation figures. Additionally, the only media authority in place only monitors broadcasting, and there is no equivalent for print or online media. Of concern is the fact that there are also no clear safety measures to prevent the influence of commercial and/or political interests, a situation which is further aggravated by the fact that most media houses are struggling economically.

The area of Political Independence, continues to underline serious issues within the political party owned media scenario, as well as concerns over the lack of independence in PSM governance and funding, as well as editorial independence, since all key positions are still directly appointed by the government. Malta is in need of an overhaul in PSM regulation if it is to suitably restore and safeguard the role of a recognised and respected public service.

Social Inclusiveness sees particularly high risk scores, especially with regards to representation of minorities, representation of persons with disabilities, and representation of women. Online hate speech, generally racist or misogynistic, or both, is on the rise, and the lack of media participation of the concerned groups is only exacerbating the situation. With regards to media literacy, although no national policy is in place, efforts are being made in the educational sector.

Finally, the digital landscape scenario reflects the overall national media situation in Malta, with very similar challenges carried forward with the technological transition. Although, one must also note that access to new technologies has also meant that new, independent newsrooms have emerged, with no political or commercial links, who together with other established media houses, are creating a platform for investigative journalism to flourish.

The recommendation of 2018, for different stakeholders to come together so as to formulate a strong and comprehensive way forward for the media in Malta still stands.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Louiselle	Vassallo	Associate Academic	University of Malta	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
Herman	Grech	Editor in Chief	The Times of Malta
Joseph	Borg	Senior Lecturer	University of Malta
Alex	Grech	Senior Lecturer	University of Malta 3CL - Commonwealth Centre for Connected Learning
Joe A.	Cannataci	Professor, Rapporteur, Chairperson	University of Malta, United Nations, STeP

