



Nemzeti Média- és Hírközlési Hatóság

Evaluation of Media Freedom Reports Published in 2025

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Foreword

Each year, the National Media and Infocommunications Authority monitors the reports on media freedom in Hungary, contributing methodological and substantive comments to ensure that the issues raised are addressed on a professional basis.

In this analysis, we have reviewed the methodologies and findings of the 2025 reports published by Freedom House, Reporters Without Borders, the Centre for Media Pluralism and Media Freedom, Article 19, the European Centre for Press and Media Freedom, the Safety of Journalists Platform, the Civil Liberties Union for Europe, the International Press Institute, and the Media and Journalism Research Center.

Executive summary

Media freedom reports and their methodologies

Freedom House

Based in Washington, D.C., **Freedom House's mission is to protect human rights and promote democratic changes**. To advance this mission, the non-governmental organisation (NGO) **used to publish three reports per year, each covering a one-year period: Freedom in the World** covers the state of political and civil liberties, **Nations in Transit** considers the state of democracy in certain Central Asian and Central European states, while **Freedom on the Net** addresses internet freedom.

Although Freedom House had previously relied heavily on financial support from the US government, the Trump administration, which took office in January 2025, froze foreign assistance, which also affected Freedom House's operations. **In the spring**, the organisation cited this as the reason for **putting the preparation of the Freedom on the Net and Nations in Transit reports on hold**. The former publication was **nonetheless released** in November, with a somewhat changed methodology and the length of country reports cut to a minimum.

The current edition of the **Freedom in the World** report **assesses the state of liberties in 195 countries** and 13 territories with disputed or special status in the year preceding its publication, providing both scores and textual evaluations. In addition to the country-specific assessments, a global report was also published again.

The project assesses countries using **25 indicators, each rated on a scale of up to 4, for a total score of 100**. Based on their overall score, states are categorised as free, partly free or not free. The report specifically **addresses the media landscape in the context of the indicator on the freedom and independence of the media**. The assessment published in 2025 **was prepared by 132 analysts and 40 advisers**, who proposed the scores for the country or countries under review. The final results were established during so-called "review meetings", in consultation with advisers and Freedom House staff.

Our previous comments on the methodology used for Freedom in the World **are also valid in the context of the current edition**. The transparency of the project is undermined by the fact that **the authors of country reports are not identified**, their identity can only be inferred from the list of analysts published by the organisation. **Once again, the exact list of sources used was not published**. It is problematic that the report **also contains claims referring to events that did not occur in the year under review** (but for example in 2021). Another issue is whether **rating each indicator on a 0 to 4 scale allows for the assessment of a country's complex media landscape**, the presentation of any potential changes and the reflection of differences between the

countries. The latter is best illustrated by pointing out that Hungary's score for media independence is identical to that of India where the report found that journalists were subjected to death threats and physical violence.

The **Freedom on the Net** report also **rated each state on a scale of 0 to 100** this year. The overall score for countries was based on replies to a questionnaire **covering three areas: obstacles to access, limits on content and violations of user rights**. The total score for each country was determined by adding up the scores achieved in these categories, based on which they were then classified as free, partly free or not free. Similarly to the Freedom in the World report, **country reports** with scoring and written assessments as well as an **overall report were also published as part of the project**.

As mentioned above, **the process for compiling Freedom on the Net reports changed** for this year. Previously, at least one expert per country was requested to **rate** the questionnaire and **prepare a written country report**; this year, however, due to budgetary constraints, these tasks **were carried out by Freedom House central staff**. To promote professional robustness, independent experts were also involved; however, their activities do not correspond to the function of the former country experts.

The report's revised methodology raises a number of criticisms. Given that both the scoring and the significantly abridged country reports this year were based on research by Freedom House central staff, **the importance of local assessment and the robustness of the study in that regard** as well as time-series **comparability** with previous years' results were **reduced**. It was argued with regard to the previously used procedure that the selection of country experts **did not ensure a pluralistic assessment**. The current prominent role of the central staff does not guarantee it either. The transparency of the quantitative assessment was compromised by the fact that the 2025 edition **did not include written assessments to provide more detailed reasoning for the scores**, and the **country report** on Hungary **only presents a brief overview** with a wording identical to last year's report, other than the four-item list of events considered to be relevant. In this context, **only seven sources are identified in four footnotes**, also insufficient to support the score.

Reporters Without Borders

Based in Paris, Reporters Without Borders' **main mission is to take action for the freedom, pluralism and independence of the press** and to defend members of the press. The organisation has published the **World Press Freedom Index report** since 2002, and its latest edition **ranks 180 countries** according to how free their media is, according to the NGO's assessment. A **global analysis, regional reports and country fact files are published** as a result of the project.

The World Press Freedom Index **rates states on a scale of 0 to 100. Scores are the result of a qualitative and a quantitative assessment**. In the former, journalists,

researchers and other professionals from each country reply to a questionnaire compiled by Reporters Without Borders, covering five indicators (political context, legal framework, economic context, socio-cultural environment and safety of journalists). The quantitative assessment looks at the number of cases of abuse or murder committed against journalists.

The methodology of the report has not changed since the previous year, only the number of questions in the questionnaire has increased, so previously reported methodological shortcomings can still be identified. **The transparency of the publication is impaired by the fact that the identities of questionnaire respondents and authors of the analyses are not made public.** Accordingly, there is no information available on whether efforts were made to ensure a pluralistic selection of the participants in the evaluation process. The World Press Freedom Index **also fails to indicate the sources used**, making it unclear whether newspapers and organisations with diverse views were taken into account or what sources were used for the figures in the written descriptions of the aforementioned indicators in the fact file on Hungary. With regard to the **fact file**, it should be noted that **its wording has not been updated since the previous version**. As for the professional robustness of the ranking, **it raises questions that countries where the organisation identified more serious risks and violations were ranked ahead of Hungary.**

Centre for Media Pluralism and Media Freedom

Every year, the European University Institute's Centre for Media Pluralism and Media Freedom publishes the **Media Pluralism Monitor** report **to assess the risks to media pluralism in Member States of the European Union** and in certain candidate countries. This includes **the publication of a quantified risk assessment**, a related **country report** and a **country ranking**. In addition, a general report summarising experiences across Europe is also published. The Media Pluralism Monitor **establishes risk scores expressed as percentages and the corresponding risk ratings in four major areas** (fundamental protection, market plurality, political independence and social inclusiveness). **As of this year**, the latter **includes six categories** (very low, low, medium-low, medium-high, high and very high) instead of three.

Risk scores **are based on replies to a questionnaire** consisting of 200 questions, **administered by members of the local team of experts**, who therefore have the most important role in the compilation of the report. Responses are graded on a scale of 0 to 1, and final results are obtained by averaging the scores multiple times. For the 2025 questionnaire, **40 of the 200 questions were modified or supplemented** to better align the survey with new EU regulatory instruments, such as the EMFA and the DSA. **A team of external experts also contributes** to the report **with no role in writing the report or scoring**; their primary function is to assist the local team with issues that are considered qualitative or subjective. **They may comment** on the views of the local team, **but it is optional to consider their comments**. According to the methodology, the

reports are based on primary and secondary sources collected by the local team. In addition, the country report mentions experts consulted, who are not the same as the members of the team of external experts. **The structure of country reports has also changed for 2025.** The new format introduced a new chapter entitled "EMFA Observatory", which assesses the legislative environment in each country in the light of the EU Regulation. This year's edition of the report also provides recommendations.

Several methodological criticisms have also been raised in connection with the Media Pluralism Monitor. **As for the local team of experts**, which plays a key role, **once again, its composition does not allow for the expression of a diversity of views**. The team evaluating Hungary only included staff members of Mérték Media Monitor besides a researcher from the European University Institute. The team of external experts is much more diverse, but for the above reasons, these experts are not guaranteed to have a meaningful influence on the results and content of country reports. The publication predominantly **cites a one-sided selection of documents as its sources, a practice that calls into question a pluralistic assessment presenting diverse views**.

Article 19

The **main objective of Article 19** is to **promote freedom of expression both globally and locally**. To this end, it has published relevant annual reports since 2017, renamed to **Global Expression Report** in 2019. This publication seeks to **assess the level of freedom of expression in 161 countries**, scoring and ranking states based on indicators. It is important to note that **Article 19 does not collect data independently** to compile the Global Expression Report, but rather **aggregates data from selected indicators** (25 indicators) of the Democracy Report published annually by the **Varieties of Democracy Institute** (V-Dem).

Some of these indicators are based on official documents and **present factual information, while others require subjective assessment carried out by experts invited by** V-Dem. V-Dem **seeks to manage the risks resulting from** any **bias** of the latter **by using** the so-called **Bayesian measurement model**, which assigns weights to the opinions of the experts involved. The Global Expression Report aims to **take a comprehensive approach to examining freedom of expression**, covering topics such as action against civil society organisations, freedom of religion and freedom of assembly. The values obtained for each indicator are used to calculate **the "expression score"** for each country, which ranges from 0 to 100. As a result, **countries are classified into one of five "expression categories"**: "open", "less restricted", "restricted", "highly restricted" or "in crisis".

As Article 19 does not collect data independently when compiling the report, **methodological criticisms can be made in relation to the V-Dem project**. For example, one concern in relation to the transparency of evaluation is that **the experts involved in the evaluation are not identified**. V-Dem's methodology **has also been the subject of criticism in scientific literature**. Associate professors Andrew T. Little

and Anne Meng **have pointed out the shortcomings of the Bayesian computational model** which, in their view, could be an explanation as to why democracy metrics derived from subjective data show a decline while objective indicators do not.

European Centre for Press and Media Freedom

Established in 2015, the main **mission** of the **European Centre for Press and Media Freedom** (ECPMF) is **to defend, preserve and promote media freedom**. In this context, **it has published its annual Mapping Media Freedom – Monitoring Reports since 2021** to review cases of violation of press and media freedom in EU Member States and candidate countries.

The **Monitoring Report does not contain a separate description of its methodology; it is based on the organisation's online database**. According to the latter's description, data is entered into the database following a multi-stage process: the ECPMF confirms and then publishes incidents collected through professional organisations, online reports and AI tools. The database mainly covers cases of physical assault, harassment, psychological abuse, attacks on property, censorship and legal atrocities. Identified cases are grouped by the type, source, context of attack and the subjects concerned.

The report does not reveal the authors' names, but references in the reports typically point to the database which **cites mostly press sources for the different cases**. The **comparability** of the number of incidents recorded for each state **would be improved if results were also presented in proportion to the population**. With regard to the classification of incidents, there is a questionable practice where **lawsuits against media outlets are almost automatically classified as legal attacks**.

Safety of Journalists Platform

The **Safety of Journalists Platform was established in 2014 as a result of an agreement between the Council of Europe and a number of NGOs** working to protect freedom of the press. Members of the framework also includes Reporters Without Borders, Article 19 and the International Press Institute. The platform **aims to monitor abuses of journalists' rights and media freedom** in member states of the Council of Europe, Russia and Belarus. These **cases, called alerts, are recorded in an online database** and, from 2019, are **also published in annual reports**.

Data are collected by professional organisations, with the Council of Europe primarily providing a platform for its partner organisations, while reserving the right to remove inappropriate incidents. Incidents are categorised into five types: attacks on the integrity and the physical safety of journalists; detention and imprisonment of journalists; harassment and intimidation of journalists; impunity; and other acts having chilling effects on media freedom. Furthermore, **alerts can be level 1 or level 2, depending on their severity**. In addition to individual cases, the platform **also keeps a record of** so-called **systemic alerts**, currently categorised into two types: those dealing with the state of public service media and those concerning the regulation of defamation. The platform

also **differentiates between resolved, in-progress** and **active alerts**, depending on whether the state concerned has taken action to address the reported issue.

As for the 2025 report, its methodology can be criticised for not **identifying the authors of the annual reports**, as only the list of participating partner organisations is made available. The report **mainly refers to alerts from and other documents produced by partner organisations rather than to primary sources** that allow for a pluralistic coverage of events. In addition to verifying compliance with essential requirements, the Council of Europe **could also examine the consistency of the criteria used to identify individual alerts across countries** as this **would lead to better comparability of the number of incidents** recorded for each country.

Civil Liberties Union for Europe

The **mission of the Civil Liberties Union for Europe** (Liberties) **is to defend the fundamental rights of EU citizens**. Based in Berlin, this NGO has an extensive network of members and partners, bringing together 23 NGOs from 20 EU Member States. In our current analysis, we review two publications from Liberties.

This year, Liberties **published its sixth annual Rule of Law Report** on developments in democracy, the rule of law and fundamental rights over the previous year. The report **examined** 21 EU Member States, including **Hungary**. **It does not rate or rank states, but it does include individual country reports**. The Rule of Law Report **does not provide a separate description of its methodology**; it only mentions that 43 civil society organisations contributed to its preparation. These were responsible for compiling country reports based on the system established by Liberties.

Since 2022, Liberties has also published its annual **Media Freedom Report**, which **assesses the state of and trends in media freedom** over the previous year in the same 21 Member States, including Hungary. This publication **does not rate or rank states either, nor does it include country reports**. Similarly to the Rule of Law Report, **it does not have a separate methodology**; it simply indicates that the data in the report are based on Liberties' own research and information from country reports prepared by member and partner organisations and published in the Rule of Law Report.

Given the high degree of similarity between the compilation processes of the two Liberties reports, they are both subject to similar criticisms over their methodology. There was **only one Hungarian organisation involved in the preparation of both documents**, namely the Hungarian Civil Liberties Union (HCLU). **It is questionable to what extent this allowed the report to reflect diverse perspectives. A similar comment can be made on the use of sources.**

International Press Institute – Media and Journalism Research Center

The **International Press Institute** (IPI) describes itself as a global network of editors, media executives and journalists whose **main goal is to promote the practice of journalism free from interference and without fear of reprisal**. The **Media and Journalism Research Center** (MJRC) **refers to itself as an independent think tank** with a mission to improve the state of journalism and the media and the quality of media policies. As a collaborative effort between these organisations, **the Media Capture Monitoring Report has been published** since 2024.

The aim of this publication is to **assess the level of state capture of the media** in certain EU Member States, including Hungary, and **the level of compliance with the relevant provisions of the EMFA** by these countries. An **overview report** and **country reports containing an individual assessment of each state are published** under the project. The Media Capture Monitoring Report **evaluates four areas**: independence of public service media; independence of media regulator(s); misuse of state funds to influence media output; media pluralism and political influence over news media. The report is **based on a questionnaire** covering the aforementioned themes, **completed by national country teams of media professionals** who rely mainly on secondary sources for their data collection.

The methodology used for the reports gives rise to a number of criticisms. While it is mentioned that the questionnaire is completed by country teams, **the publication assessing Hungary identifies only one author**, so it is unclear whether this person alone is the entire country team or whether there are other members. The report's **use of sources is not diverse** and the 2025 edition largely **repeats the exact wording of the previous year's publication**.

Quantitative results for Hungary in the reports under review

In the **Freedom in the World** report, **both Hungary's overall score** (65) and **its score on the media independence indicator** (2) **remained unchanged** in 2025. The latter result has not changed since the current methodology was introduced in 2018.

Hungary's score in the Freedom on the Net report also **remained the same**: the organisation **gave a score of 69**, the same as last year, which resulted in Hungary being categorised as partly free once again. **However, two subscores have been changed**: the score for limits on content was reduced by one, while the indicator on violations of user rights improved by one.

As for Reporters Without Borders, both Hungary's score and ranking declined slightly in comparison with the previous year. This year, Hungary was ranked 68th with a score of 62.82, while a year earlier it ranked 67th with a score of 62.98.

As for the Media Pluralism Monitor, a slight **deterioration of one percentage point**, rounded up, **was observed in comparison with last year**: the current edition, reviewing 2024, gave a risk score of 74.25 percent, rounded to 74 percent, for Hungary. There were major negative changes for fundamental protection and some minor ones for market plurality, no change for political independence, while the assessment of social inclusiveness improved.

In the 2025 edition of the Global Expression Report by Article 19, **Hungary ranked 88th** with a score of 50. This represents a decline from 83rd place with a score of 52 in 2024.

The **Mapping Media Freedom – Monitoring Report** published by ECPMF in February 2025 **identified 68 incidents** in Hungary **for 2024**. This means 19 more cases than a year earlier.

As at 1 December 2025, the **Safety of Journalists Platform database contained 36 active alerts for Hungary** in total. There are no resolved cases for Hungary in their records.

Factual errors and subjective opinions about Hungary

The reports issued in 2025 **contain recurrent critical remarks on the independence of the Media Council and the NMHH**. The Media Pluralism Monitor questions the independence of the Media Council, including by criticising the rules on the election of its members. Similar remarks are also found in both publications from Liberties this year, as well as in the Media Capture Monitoring Report 2025 and in the current country fact file by Reporters Without Borders.

Contrary to the findings in the reports, **Act CLXXXV of 2010 on Mass Communications (Media Act)** **clearly states that the NMHH is an independent regulatory agency** subordinated solely to the law and exercises its powers and jurisdiction independently in accordance with the law. **Similar guarantee rules are set out in the Media Act for the Media Council**: the election of its members and its chairman is governed by strict procedural and conflict of interest rules.

It should be noted that, **in several EU Member States**, the election and appointment of bodies similar to the Media Council **are governed by rules that do not require a qualified majority in the legislature**. In this regard, we can refer, for example, to Ireland where the competent minister, i.e. a member of the executive, is empowered to appoint the members of the Coimisiún na Meán.

Several publications levelled criticism at the state of media pluralism in Hungary. The 2025 edition of Freedom in the World reports that "*while privately owned opposition-aligned media outlets exist, national, regional and local media are dominated by pro-government outlets*".¹ Corresponding claims can be found in the 2025 edition of the Media Freedom Report and the current country fact file by Reporters Without Borders.

¹ [Freedom House: Freedom in the World 2025 – Hungary. Question D1.](#)

In this respect, it can be said that the **Hungarian media market is diverse**, as evidenced by the fact that **there are media outlets presenting diverse views among key market players**. As shown in the NMHH's Media Market Report 2025, RTL's news programmes, generally considered critical of the government, continue to be particularly popular in the television market. In the online space, which plays a key role as a source of information, the most visited online outlets also include several sites that are considered critical of the government. YouTube, an increasingly important news source, also features a wide range of channels with differing viewpoints and with a large number of viewers.

Both 2025 reports by Liberties cover the 2024 amendment to the Criminal Code: "*a new draft law **criminalising hateful comments** was put forth*". As to this new offence type, it is the organisation's view that "*especially with regard to its apparently broad application, there is great concern that **it can potentially undermine freedom of expression***".²

The reports by Liberties are misleading in that the aforementioned amendment **does not seek to tackle hateful comments in general**, but rather **to criminalise the publication or use of any expression, representation, image or audio recording** which expresses **an intention or purpose to commit a criminal offence of causing loss of life** or with particular cruelty to **an identifiable person or persons**. The reports also fail to mention that the Act makes an important exception for members of the media by providing that the act of publishing or using such content to report on current events shall not be liable for prosecution, provided that the act is incapable of intimidation.

With regard to the **Online Platform Dispute Resolution Board**, the current Media Pluralism Monitor report for 2024 **concludes** that it "***is not an independent body**, as required by the Digital Services Act (Art. 21), but an institution directly operated by the media authority NMHH*".³

This publication describes the requirements set out in the relevant provisions of the Digital Services Act (DSA) incorrectly. Indeed, the legislation requires the out-of-court dispute resolution body to be independent of digital service providers and their users, instead of the certifying Digital Services Coordinator. This is also confirmed by the fact that the Austrian Digital Services Coordinator, *die Kommunikationsbehörde Austria (KommAustria)*, has accredited as a dispute resolution body *RTR-GmbH, Fachbereich Medien*, which identifies itself as the administrative body of KommAustria.

In addition to the aforementioned factual errors, **reports included in the analysis also contained subjective findings**. As an example, the Rule of Law Report published by Liberties makes a link between the budget of the NMHH and its claims about the independence of the Authority: "*these amounts are theoretically suitable to guarantee high-level professional work*;

² [Liberties: Rule of Law Report 2025, p. 447; Media Freedom Report 2025, p. 41.](#)

³ [European University Institute, Centre for Media Pluralism and Media Freedom – Media Pluralism Monitor 2024 report on Hungary, pp. 12 and 40.](#)

however, **in the case of the Authority and the Media Council, these serve as the price of loyalty, which is proved by their inactivity.**⁴

The organisation **expresses an opinion of a political nature on the NMHH's statutory budget** without explaining or substantiating the alleged "inactivity" it criticises.

The 2025 report by Reporters Without Borders and the current publication by the Safety of Journalists Platform **compare the Hungarian media landscape to countries of which they themselves have a much less favourable opinion.**

Reporters Without Borders mentions Hungary on the same page as Russia, even though the latter's country fact file claims that "*almost all independent media have been banned, blocked and/or declared 'foreign agents' or 'undesirable organisations'*".⁵ The Safety of Journalists Platform **also draws parallels with Turkey in addition to Russia**, although proceedings, and even an attack, against journalists were identified in the former.

1. Description of organisations

1.1. Freedom House

Based in Washington, D.C., **Freedom House** was founded in 1941 to promote U.S. action against fascism during the World War.⁶ The organisation **aims to protect human rights and promote democratic changes**, with a particular focus on civil and political liberties. It seeks to facilitate these aims, for example, by publishing analyses and advocacy activities. Three central themes are identified: countering authoritarian regimes, promoting a global democratic landscape and supporting defenders of democratic change.⁷

The NGO **relied heavily on grants from the US government in the past to secure its funding**. However, the **Trump administration**, which took office in January 2025, **froze US foreign assistance**. This decision **also had a serious impact on Freedom House's operations**, with some of its staff being made redundant and 80 percent of its international programmes being suspended.⁸

The reduction in funding **has also had a negative impact on the publication of Freedom House's reports on media freedom**. Previously, it **published three annual reports**, each covering a one-year period: **Freedom in the World**, providing a global assessment of civil and political liberties; **Nations in Transit**, assessing the state of democracy in selected Central European and Central Asian countries; and **Freedom on the Net** addressing internet freedom. In addition, **Freedom of the Press** was published annually between 1980 and 2017 to assess press freedom in nearly 200 countries.⁹ From time to time, it also published special reports,

⁴ [Liberties – Rule of Law Report 2025, p. 441.](#)

⁵ [Reporters Without Borders: Country fact-file: Russia.](#)

⁶ [Freedom House: Our History.](#)

⁷ [Freedom House: Our Issues.](#)

⁸ [Freedom House: The Effects of the US Foreign Aid Freeze on Freedom House.](#)

⁹ [Freedom House: Publication Archive.](#)

including Media Freedom: A Downward Spiral in 2019 and Reviving News Media in an Embattled Europe in 2023.¹⁰

Following the decision on government **grants, the organisation** announced in its spring communication **that it would put the preparation of Freedom on the Net and Nations in Transit on hold**. On 13 November 2025, **however, the Freedom on the Net report was still published**, albeit with a somewhat changed methodology and the length of country reports reduced to a minimum. As they put it, it “*has been abridged for Freedom on the Net 2025 due to ongoing budgetary constraints*”.¹¹

1.2. Reporters Without Borders

Headquartered in Paris, **Reporters Without Borders** was founded in 1985 with **a mission to take action for the freedom, pluralism and independence of the press and to defend those who represent these values**. It has advisory status with the United Nations, UNESCO, the Council of Europe and the Organisation internationale de La Francophonie.¹²

It describes itself as an international non-profit organisation, with **65 percent of its funding coming from public sector grants**, based on data from 2024. These include, for example, grants from the European Union and Dutch, Swedish and French public bodies.¹³ In addition, it also identified the Ford Foundation and the Open Society Foundation among its primary partners in its 2024 activity report.¹⁴

The World Press Freedom Index has been published every year since 2002, **ranking 180 countries** according to how free the media is in each country based on the organisation’s research. It also provides an assessment of each country in individual country fact files on its website.¹⁵

1.3. Centre for Media Pluralism and Media Freedom

Media Pluralism Monitor is **published by the Centre for Media Pluralism and Media Freedom of the European University Institute** with funding support from the European Union. The **aim** of this publication **is to assess the risks** to media pluralism in **Member States of the European Union and certain candidate countries**.¹⁶ Fully fledged studies were carried out on eight occasions between 2016 and 2024, while, as a pilot, in 2014 and 2015, it was

¹⁰ [Freedom House: Media Freedom: A Downward Spiral](#); [Freedom House: Reviving News Media in an Embattled Europe](#).

¹¹ See, for example: [Freedom House: Freedom on the Net 2025 – Hungary](#).

¹² [Reporters Without Borders: Who are we?](#)

¹³ [Reporters Without Borders: Treasurer’s Report to the General Assembly](#). p. 4.

¹⁴ [Reporters Without Borders: Activity Report 2024](#).

¹⁵ [Reporters Without Borders: Country fact-file: Hungary](#).

¹⁶ [About us – Centre for Media Pluralism and Media Freedom](#).

conducted first with 9 Member States, and then involving the 19 Member States not assessed in the previous year.¹⁷

The project **is of both legal and policy relevance**, as **it is identified** by the European Commission **as a key source in the annual rule of law reports** forming a part of the Rule of Law Mechanism, and **was also referenced in both the proposal for a European Media Freedom Act (EMFA) and the legislation itself.**¹⁸

A quantified risk assessment based on the scoring of a standardised questionnaire, a related **written country report** and, since the 2021 report, **a country ranking is published** under the project. Furthermore, a **general report** summarising the experiences gathered at European level **is also published**. The Media Pluralism Monitor **provides an overview of the risk landscape covering four main areas**: fundamental protection, market plurality, political independence and social inclusiveness.¹⁹

As last year, the project was fully implemented for 32 countries, i.e. the EU Member States and Turkey, Serbia, Montenegro, North Macedonia and Albania, in 2025. Partial assessments were carried out for Bosnia and Herzegovina, and Moldova, while a report with no quantified results was published on Ukraine.²⁰

1.4. Article 19

Founded in 1987, **the international non-governmental organisation Article 19 is dedicated to promoting freedom of expression at both local and global levels**. This is also where its name comes from, as it refers to Article 19 of the Universal Declaration of Human Rights, which provides for the freedom of opinion and expression.

It receives financial support for its activities from the European Commission, the Open Society Foundations, the National Endowment for Democracy and Freedom House, among others.²¹

¹⁷ [Media Pluralism Monitor. European University Institute, Centre for Media Pluralism and Media Freedom.; Monitoring media pluralism in the digital era. European Commission.](#)

¹⁸ [Media Pluralism Monitor. European University Institute, Centre for Media Pluralism and Media Freedom: Mapping risks for media pluralism and the safety of journalists across Europe; Proposal for a Regulation of the European Parliament and of the Council establishing a common framework for media services in the internal market \(European Media Freedom Act\) and amending Directive 2010/13/EU; For the European Commission's comments on uses of the Media Pluralism Monitor, see also Monitoring media pluralism in the digital era. European Commission; Press release from the European Commission. European Media Freedom Act: Commission proposes rules to protect media pluralism and independence in the EU. 16 September 2022; Recital \(27\) of the EMFA.](#)

¹⁹ [European University Institute, Centre for Media Pluralism and Media Freedom – Media Pluralism Monitor General Report on 2024, pp. 1 and A-1-2; Country Reports.](#)

²⁰ [European University Institute. Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 52; Media Pluralism Monitor 2024 preliminary report on Ukraine.](#)

²¹ [Article 19: Governance and funding.](#)

In order to further its aforementioned objective, **Article 19 addresses five main themes:** 1) promoting media independence; 2) increasing access to information; 3) protecting journalists, 4) expanding civil space, 5) placing human rights at the heart of developing digital spaces.²²

Article 19 **has published its Global Expression Report on an annual basis since 2017** (the 2017 and 2018 editions were published as The Expression Agenda Report) with the aim of **assessing the level of freedom of expression in the 161 countries** reviewed in the study, scoring and ranking states based on indicators. However, its online database also includes data from before 2017.²³

1.5. European Centre for Press and Media Freedom

The **European Centre for Press and Media Freedom** (ECPMF) was established in Leipzig in 2015. Its **mission is to protect, preserve and promote media freedom**. To achieve this, it monitors infringements, consults with professional stakeholders and provides various forms of assistance, such as legal assistance.²⁴ Its supporters include the City of Leipzig, the German Government's Ministry of Foreign Affairs and the European Commission.²⁵

This non-profit organisation has published its annual Mapping Media Freedom – Monitoring Reports since 2021 to **review cases of violation of press and media freedom in EU Member States and candidate countries**. The document aggregates and presents the number of such incidents for each country under review.²⁶

It monitored incidents of media and press freedom violations across Europe even before 2021, recording them in its online database.²⁷ However, at that time, **no annual reports were published**; instead, smaller assessments were released, typically on a quarterly or semi-annual basis.²⁸

The ECPMF is **a member of the Media Freedom Rapid Response (MFRR) mechanism which monitors and addresses cases of violation of press and media freedom in EU Member States and candidate countries**. Other MFRR members include Article 19, Free Press Unlimited, the European Federation of Journalists, the International Press Institute and Osservatorio Balcani Caucaso Transeuropa. The Mapping Media Freedom – Monitoring Report is also published under this project.²⁹

1.6. Safety of Journalists Platform

The *Memorandum of Understanding* between the **Council of Europe** and a number of **non-governmental organisations working to protect freedom of the press** resulted in the

²² [Article 19: About us; The Article 19 story.](#)

²³ [Global Expression Report: About.](#)

²⁴ [ECPMF: About us.](#)

²⁵ [ECPMF: Finances.](#)

²⁶ [Mapping Media Freedom: Analysis.](#)

²⁷ [Mapping Media Freedom: Incidents.](#)

²⁸ [Mapping Media Freedom: Methodology.](#)

²⁹ [Media Freedom Rapid Response: What is MFRR.](#)

establishment of a **framework for cooperation called the Safety of Journalists Platform** on 4 December 2014.³⁰

This framework **currently has 15 members**, including the European Federation of Journalists (EFJ), the International Federation of Journalists (IFJ), Article 19, the International Press Institute, ECPMF, Free Press Unlimited and Reporters Without Borders.³¹

The programme is supported by pledges from the governments of Belgium, Estonia, Liechtenstein, Luxembourg, the Netherlands, Romania, Slovakia, Slovenia, Switzerland and the United Kingdom.³²

The framework was set up to **monitor violations of journalists' rights and media freedom in member states of the Council of Europe**, and **in Russia and Belarus** (the former has withdrawn, the latter has never been a member). The information published by the Platform is also used by the Council of Europe as a starting point for dialogue with the states concerned, making proposals to address the issues.³³

The platform **enters cases of abuse**, called alerts, **into a database** on its website. **It has also published annual reports since 2019** to present its assessment of media freedom by theme (addressing each key challenge identified) for each country. Hungary was reviewed in 2019 and 2020 in separate subchapters, once together with Poland.³⁴

1.7. Civil Liberties Union for Europe

Based in Berlin and with representation in Brussels, the **Civil Liberties Union for Europe** (Liberties) **has set itself the goal of protecting the fundamental rights of EU citizens**. In this spirit, it wishes to ensure that the European Union's legislation respects freedoms, acts against governments and companies that threaten them, and uses its powers to make it easier for everyone to exercise their rights. It **has an extensive network of members and partners**, including 23 civil society organisations from 20 EU countries.³⁵

With regard to its funding, Liberties stresses that **it does not accept grants from governments, authorities** or organisations under their control. Its website also lists the Oak Foundation, the Open Society Foundation, the Open Society Initiative for Europe and the European Commission as its supporters.³⁶

³⁰ [Safety of Journalists Platform: Who are we?](#)

³¹ [Safety of Journalists Platform: Partners.](#)

³² [Safety of Journalists Platform: Who are we?](#)

³³ [Safety of Journalists Platform: Who are we?; Memorandum of Understanding on the setting-up of an Internet-based Freedom of Expression Platform to promote the protection of journalism and safety of journalists. 04.12.2014, p. 3.](#)

³⁴ [Safety of Journalists Platform: Reports.](#)

³⁵ [Civil Liberties Union for Europe: About us.; Our Network.](#)

³⁶ [Civil Liberties Union for Europe: About us.](#)

It has published **the Rule of Law Report** for the sixth time to **present developments in the rule of law, democracy and fundamental rights over the previous year**. The publication assesses 21 Member States of the European Union, including Hungary.

It **consists of two main sections**. The **first section** addresses issues at the European level such as an over-politicised, inefficient and underfunded judiciary; corruption; the deteriorating state of media freedom due to government interference; the erosion of checks and balances; the growing threat to civil society; rising hate speech and discrimination; and tightening immigration policies associated with the spread of the latter. The **second section** contains country reports, with subchapters addressing the judiciary; the anti-corruption framework; the media landscape and media freedom; checks and balances; the civil sector; violations of human rights obligations and other systemic issues affecting the rule of law. Each subchapter also includes recommendations for the corresponding area. **The report does not provide scores or country rankings.**³⁷

The **Rule of Law** report does not include a description of its methodology; however, it is mentioned that the assessment was carried out **with the involvement of 43 civil society organisations**. These organisations compiled the country reports based on the system established by Liberties.³⁸

Since 2022, Liberties has also **released the annual Media Freedom Report, which examines trends in media freedom in EU Member States** over the previous year. It assesses media freedom and media pluralism, the safety and protection of journalists, and freedom of speech and information. In addition, the current edition of the Media Freedom Report also covers EU legislation on media pluralism and freedom separately.³⁹

Liberties **does not publish country reports** as part of the Media Freedom Report, nor does **it score or rank the states concerned**. The report, like the Rule of Law Report, examined 21 EU Member States in 2025. **Hungary has been included in all Media Freedom Reports published so far.**

The Media Freedom Report does not have its own methodology either. All the 2025 edition mentions is that the data therein is based on Liberties' own research and information from country reports prepared by member and partner organisations and published in the Rule of Law Report. In this regard, the report notes that the Media Freedom Report is complementary to the organisation's Rule of Law Report.⁴⁰

Given that neither the Rule of Law Report nor the Media Freedom Report **has its own methodology**, the related **observations are presented** here **rather than in a separate subsection on methodology**. In this respect, there is no reason to distinguish between the

³⁷ [Civil Liberties Union for Europe: Rule of Law Report 2025, pp. 3 and 9.](#)

³⁸ [Civil Liberties Union for Europe: Rule of Law Report 2025, pp. 3 and 9.](#)

³⁹ [Civil Liberties Union for Europe: Media Freedom Report 2025, p. 2.](#)

⁴⁰ [Civil Liberties Union for Europe: Media Freedom Report 2025, p. 3.](#)

two reports as **the process of preparing them and the claims they contain are largely identical.**

The Hungarian Civil Liberties Union (HCLU) was the only Hungarian member organisation involved in the preparation of both documents. In this context, **the question arises as to how the involvement of a single Hungarian partner can ensure that the report reflects diverse perspectives.**⁴¹

A similar observation can be made concerning the use of sources, as **the selection of the sources used to support the claims about Hungary in the publications was mostly one-sided, thus calling into question the plurality of the assessment and the reflection of diverse perspectives.** In addition, the Media Freedom Report draws on publications by other organisations issuing media freedom rankings, such as the International Press Institute, Reporters Without Borders and the Centre for Media Pluralism and Media Freedom, all of which merit similar observations.⁴²

1.8. International Press Institute – Media and Journalism Research Center

Founded in 1950, the **International Press Institute (IPI) identifies itself as a global network** of editors, media executives and journalists. As they put it, **their goal is to facilitate conditions that allow journalism to operate free from interference and without fear of reprisal.** To this end, the organisation carries out advocacy activities vis-à-vis governments, raises awareness of violations of media freedom, and implements various programmes and campaigns.⁴³

The IPI receives financial support from the European Commission, the Konrad-Adenauer-Stiftung, the Open Society Foundations, UNESCO and the National Endowment for Democracy.⁴⁴

The **Media and Journalism Research Center (MJRC)** defines itself as an independent think tank with the **aim of improving the quality of media policies and the state of independent media and journalism** through research, knowledge sharing and financial support. It also mentions that the MJRC carries on the activities previously conducted by the Center for Media, Data and Society at the Central European University until October 2022.

The MJRC states that it **does not accept any form of government support** and its operations are funded from commercial revenues, charitable donations and research grants. Among others, it has participated in research funded by the European Union, the

⁴¹ [Civil Liberties Union for Europe: Our Network.](#)

⁴² See, for example: [Liberties: Media Freedom Report 2025, pp. 14, 24, 37, 41, 46; Rule of Law Report 2025, pp. 440–442, 444.](#)

⁴³ [International Press Institute: About.](#)

⁴⁴ [International Press Institute: Supporters and Partners.](#)

Open Society Foundations, the National Endowment for Democracy and the Thomson Reuters Foundation.⁴⁵

The **Media Capture Monitoring Report** has been published as a collaborative effort between the IPI and the MJRC since 2024. The aim of this annual report is to **assess the level of media capture** in EU countries and **the degree of compliance** of Member States with the relevant provisions of **the European Media Freedom Act (EMFA)**. An overview report and country reports providing an individual assessment of each of these countries are also issued as part of the publication.⁴⁶

Not only are **the legal requirements assessed, but their practical application is also reviewed**, and the report identifies areas where reforms are needed for the state being examined to comply with the EMFA.⁴⁷

The project, like the Mapping Media Freedom – Monitoring Report, is part of the MFRR, funded by the European Commission, as described above.⁴⁸

The second, 2025 edition of the project had **evaluated eight EU Member States** – Bulgaria, Finland, Greece, **Hungary**, Poland, Romania, Slovakia and Spain – as at the date of conclusion of this analysis, but the report notes that **the scope of the analysis is planned to be extended to cover other states as well.**⁴⁹

Countries were selected on the basis of their geographical location and the extent of state capture of the media: according to the publication, Central, Southern and Eastern European countries have the highest levels of political influence over the media, while Finland, with a more favourable view on the state of media freedom, was included primarily for the purpose of comparison.⁵⁰

2. Methodology and evaluation of media freedom reports

2.1. Freedom House

Freedom in the World

As mentioned above, the **Freedom in the World report assesses the state of political and civil liberties in 195 countries** and 13 other territories with disputed or special status selected by Freedom House (this includes, for example, the Gaza Strip and Russian-occupied territories of Ukraine), providing both **scoring and written evaluations**, for the year preceding the publication. In addition to an individual assessment of each country, a global report is published.

⁴⁵ [Media and Journalism Research Center: A global research hub for media, journalism and power.](#)

⁴⁶ [Media and Journalism Research Center: Media Capture Monitoring Report.](#)

⁴⁷ [Media and Journalism Research Center: Media Capture Monitoring Report. Project summary.](#)

⁴⁸ [Media and Journalism Research Center: Media Capture Monitoring Report. Project overview and research design.](#)

⁴⁹ [Media and Journalism Research Center: Media Capture Monitoring Report. Project overview and research design.; Country Reports.](#)

⁵⁰ [Media and Journalism Research Center: Media Capture Monitoring Report: Overview. p. 4.](#)

The project **evaluates** countries based on **a total of 25 questions**, each corresponding to an indicator. Of these, 10 cover political liberties and 15 cover civil liberties. The **indicators are divided into subcategories** (topics) **in both areas**. Subcategories related to the state of political liberties are the electoral process, political pluralism and participation, and the functioning of government. **The subcategories related to the situation of civil liberties are freedom of expression and belief**, the right to assembly and association, the rule of law, personal autonomy and individual rights.

The report **deals** specifically **with the media landscape in the context of the indicator on freedom and independence of the media**, which is part of the freedom of expression and belief subcategory; however, findings on the media are also included in the assessment of other indicators.

A maximum score of 4 is available for each indicator. Accordingly, a score of 40 can be achieved for political liberties and 60 for civil liberties, yielding **a total score of 100**. Based on the overall score, **states are classified into one of three categories: free, partly free or not free**.⁵¹

This time, as for the 2024 edition, **132 analysts and 40 advisers contributed** to the country reports and also made proposals for the scores of the country or countries they reviewed. Based on the methodology, the scores given by the analysts were finalised during "review meetings" held with Freedom House staff and expert advisers. **Thus, the final results were obtained as a consensus between analysts, advisers and Freedom House**.⁵²

Our earlier **criticisms** of the report's methodology also apply **to the 2025 edition**.

The transparency of the project is impaired by the **lack of indication of the authors of country reports** and the fact that their identities can only be inferred from the list of analysts published by the organisation.

Given that a total of 132 analysts were involved in the assessment of 195 countries and 13 territories of disputed or special status, **one analyst may have been involved in a comprehensive assessment of several countries**, covering many aspects of the political and legal system. This raises the question whether the involvement of a single expert is sufficient to carry out such a complex task, and **to what extent this practice allows for a pluralistic assessment that reflects diverse perspectives**.

Although the description of the methodology of Freedom in the World states that "*a broad range of sources, including news articles, academic analyses, reports from nongovernmental organisations, individual professional contacts and on-the-ground research*"⁵³ is used, the **exact list of sources used is**, as in previous years **not available this year either**. In its absence, the question arises as to **what extent efforts were made**

⁵¹ [Freedom House: Freedom in the World Research Methodology](#).

⁵² [Freedom House: Freedom in the World Research Methodology](#).

⁵³ [Freedom House: Freedom in the World Research Methodology](#).

when preparing the report to use articles, reports and analyses that **present diverse views**.⁵⁴

The 2025 country report on Hungary **also included events that did not occur in the year under review**, even though the report's methodology explicitly states that "*analysts score countries and territories based on the conditions and events within their borders during the coverage period.*"⁵⁵ For example, when presenting the scores for 2024, the report refers to the Pegasus case that happened in 2021.⁵⁶ In addition, **observations from previous years' documents**, containing factual errors or subjective opinions in some instances, **are repeated a number of times**.⁵⁷

Moreover, **it is debatable whether a score of between 0 and 4** for a single indicator **allows for a complex assessment of a country's media landscape**, an adequate articulation of any changes in its state and an illustration of the differences between the countries. For example, **Hungary was given a score of two** for media independence, the **same as India where, the report claims, journalists "risk harassment, death threats, and physical violence in the course of their work."**⁵⁸ The **limitations of the current scoring scheme** are also **demonstrated by** the fact that **Hungary's score** for this indicator **has remained unchanged since 2018**, i.e. **since the introduction of the current methodology**.⁵⁹ Accordingly, it would be advantageous if individual scores were allowed to change by fractions, leaving room for a more detailed scoring to better reflect differences.⁶⁰

Freedom on the Net

In 2025, the **Freedom on the Net report** once again **examined three areas**: obstacles to access, limits on content and violations of user rights.

The "**obstacles to access**" indicator covers legal, economic, infrastructural and political obstacles to accessing the internet. In the context of "**limits on content**", the technological possibilities of censorship and the legislation of content on the internet are analysed. With regard to "**violations of user rights**", surveillance and privacy, legal protection for and limits on freedom of expression, and the legal and extralegal consequences of online activities are reviewed.

As part of the project, **Freedom House publishes** both **scoring** and related **written evaluations**. The former **is based on replies to a questionnaire consisting of 21 questions**, including 100 subquestions, covering all three aforementioned areas: a maximum score of 25

⁵⁴ [Freedom House: Freedom in the World Research Methodology](#).

⁵⁵ [Freedom House: Freedom in the World Research Methodology](#).

⁵⁶ [Freedom House: Freedom in the World 2025 – Hungary. Questions D1 and D4](#).

⁵⁷ [Freedom House: Freedom in the World 2025 – Hungary](#).

⁵⁸ [Freedom House: Freedom in the World 2025 – India](#).

⁵⁹ [Freedom House: Freedom in the World 2018 – Hungary. Question D1; 2019 – Question D1; 2020 – Question D1; 2021 – Question D1; 2022 – Question D1; 2023 – Question D1; 2024 – Question D1; 2025 – Question D1](#).

⁶⁰ [Freedom House: Nations in Transit Methodology](#).

for obstacles to access, 35 for limits on content and 40 for violations of user rights can be achieved.

Five of the questions relate to obstacles to access and eight each to limits on content and violations of user rights. **The final result is determined by adding up the scores available for each question** (subquestions are intended for the guidance of the respondent and not scored independently).

In this project, as with other Freedom House reports, **states are scored on a scale of 0 to 100** and then **classified into one of three categories: free** (70 to 100); **partly free** (40 to 69) or **not free** (0 to 39).

Country scoring in Freedom on the Net reports **was reversed in 2018; prior to that, it was as follows:** free between 0 and 30, partly free between 31 and 60, not free between 61 and 100. Even though the change in methodology only happened in 2018, scoring based on the new calculation method has been available since 2017. Written evaluations are provided to explain the rationale behind each country's quantitative results.

Although **in the past at least one expert or organisation per country was requested to score the questionnaire** and prepare a written country report, **this year**, for the aforementioned budgetary reasons, **the organisation's central staff analysed the events that took place in the countries assessed**, and then gave scores and prepared a written evaluation which was reduced to a minimum compared to previous years.

According to the description of the methodology for this year, **independent experts were involved to ensure the robustness of assessments**. However, the role of this group of experts does not correspond to the function of "country experts" examining individual states. According to the previous methodology, local experts submitted their scores and draft reports, which were then subject to two rounds of reviews, first by a regional review meeting and then, if necessary, by the Freedom House central staff. Therefore, results had largely been based on the work of "country experts" up to this point. **However, the external experts involved in 2025 only played a complementary role, were fewer in number, were not assigned to a specific country and were not involved as submitters.**⁶¹

In our previous analyses, we raised a number of criticisms over the methodology of the report, concerning, in particular, the role of country experts who, as indicated, had been responsible for scoring and preparing a written evaluation for each country until this year. In this regard, we pointed out the lack of transparency in the selection process, as Freedom on the Net did not provide a substantive or specific description as to how these experts were appointed. In this context, we pointed out that **the involvement of one expert** per country, or **at most two** as in the case of Hungary, **rendered a pluralistic assessment allowing for a**

⁶¹ [Freedom on the Net: Freedom on the Net Research Methodology](#); Previous methodology: [Freedom on the Net 2024, pp. 34-35](#).

diversity of perspectives uncertain. In addition, we noted that the methodology of the report was not sufficiently transparent in that to exactly what extent the meetings of regional experts and Freedom House central staff could influence the scoring and written evaluations submitted by local experts.⁶²

Since country **scoring and the country reports significantly abridged this year were fundamentally based on research by Freedom House central staff, questions may be raised about the professional robustness of the reports compared to previous years** and the time-series **comparability of 2025 results.**

The **transparency of the quantitative assessment is weakened by** the fact that this year, **there were no written evaluations for each area to substantiate the scores in more detail**, only a few lines of summary, a “political overview” and a short list of developments considered significant. Moreover, in the case of Hungary, the wording of the summary and the overview is identical to last year’s description.

In line with the shorter length of the 2025 country report, **only seven sources were listed in four footnotes in this year’s edition**, which **do not substantiate the detailed scoring in the report.** In addition, we also reiterate our earlier criticism that the **methodology of the publication still does not set any actual expectations for the selection** and use of **sources for scoring and the written evaluations.**⁶³

2.2. Reporters Without Borders

World Press Freedom Index

The World Press Freedom Index is **compiled on the basis of the previous calendar year.** However, **any extraordinary events that may occur before publication**, such as the outbreak of war, coup d'état or introduction of strict, repressive legislation, are also taken into account to ensure that the index reflects the most up-to-date state of affairs possible.

Each state is ranked on the basis of **a score between 0 and 100**, where 100 represents the best result. The score of each state is **made up of two components: a qualitative and a quantitative assessment.** The former is the result of a questionnaire survey carried out by Reporters Without Borders and completed by journalists, researchers and other professionals in each country. **The latter is a quantitative assessment of how many cases of abuse or murder committed against journalists occurred** and how serious they were.

The 2025 assessment includes a questionnaire consisting of 124 questions and subquestions to **evaluate countries against five indicators.** The **political context** indicator examines the respect for media autonomy by state and political actors, social support for the media and the degree of political pressure. The **legal framework**

⁶² [NMHH: Evaluation of media freedom reports published in 2024. 08. 01. 2025, pp. 13–15; NMHH: Evaluation of Media Freedom Reports. 08. 01. 2025, pp. 42–43; Freedom on the Net 2024 full report, p. 41; Freedom House: Freedom on the Net. Research Methodology.](#)

⁶³ [Freedom House: Freedom on the Net 2025 full report, p. 33; Freedom on the Net 2025 – Hungary.](#)

indicator considers issues such as the degree to which the media are free to work without censorship or other sanctions, or excessive restrictions on freedom of expression. The **economic context** indicator aims to evaluate the economic constraints linked to state or non-state actors affecting the media. The **socio-cultural environment** indicator examines social and cultural constraints on the press (e.g. attacks based on gender, ethnicity or religion). Finally, questions related to **safety** concern cases of physical and psychological abuse against members of the press and the professional harm suffered.⁶⁴

Within the framework of the project, **Reporters Without Borders publishes global assessments and regional analyses**, and **makes available short country fact-files** on its website, detailing the subscores for each indicator in addition to providing a written evaluation.⁶⁵

Considering that **the methodology of the report has not changed since the previous year** (only the number of questions in the questionnaire has increased), the **methodological shortcomings** mentioned in our previous analyses continue **to be observed**.⁶⁶

The **transparency of** the report is greatly reduced by the fact **that the identity of neither the authors of the analyses nor the respondents to the questionnaires are public**. Consequently, there is no information as to **whether any attempt was made to achieve a pluralistic selection of participants** in the assessment process.

The **lack of a list of sources used by the organisation** has a negative impact on the professionalism of the report which, once again in 2025, raises the question whether the **authors took into account professionally credible sources presenting diverse views** when preparing the reports. This is particularly problematic for findings with figures. One example of this is the claim in the country fact file on Hungary that "*the ruling party [...] now controls 80% of the country's media*" without citing any references.⁶⁷

The **text of the fact file** on Hungary **can be criticised** for a lack of consistency in reflecting changes in ranking and scoring, as it **has not been updated in light of the new results**.⁶⁸

Moreover, in this year's report by Reporters Without Borders, **Hungary ranks behind countries** such as Sierra Leone, Gambia and Liberia; **states where serious risks and violations**, such as violence against and arrests of journalists, **have been identified**.⁶⁹

⁶⁴ [Reporters Without Borders: Methodology used for compiling the World Press Freedom Index 2025](#).

⁶⁵ [Reporters Without Borders: World Press Freedom Index 2025](#).

⁶⁶ [NMHH: Evaluation of media freedom reports. 08. 01. 2025, pp. 45–46; Evaluation of Media Freedom Reports published in 2024. 08. 01. 2025, pp. 15–16](#).

⁶⁷ [Reporters Without Borders: Country fact-file: Hungary](#).

⁶⁸ [Reporters Without Borders: Country fact-file: Hungary](#).

⁶⁹ See, for example: [Reporters Without Borders: Country fact-file: Sierra Leone](#); [Country fact-file – Liberia](#); [Country fact-file – Gambia](#).

2.3. Centre for Media Pluralism and Media Freedom

Media Pluralism Monitor

As indicated above, this report **assigns risk values to four main areas** (fundamental protection, market plurality, political independence and social inclusiveness).⁷⁰ The organisation developed a different methodology from that of previous years to undertake a more in-depth assessment of threats to media pluralism and freedom, giving more visibility to differences across countries. **The previously used three-tier risk system** (low risk below 34 percent, medium risk between 34 and 66 percent, and high risk above 66 percent) **has been replaced with a six-tier system**. Accordingly, each area **is classified as very low risk** (below 17 percent), **low risk** (between 17 and 33 percent), **medium-low risk** (between 34 and 50 percent), **medium-high risk** (between 51 and 66 percent), **high risk** (between 67 and 83 percent), and **very high risk** (over 83 percent). The best achievable score is 3 percent, while the worst is 97 percent, in order to avoid extreme values indicating the complete absence or certainty of risk.⁷¹

Under **fundamental protection**, issues identified as preconditions for media freedom, such as the protection of the freedom of expression, the right to information, effective regulatory guarantees for the independence and freedom of journalism, and the independence and effectiveness of the media authority are examined.

Under **market plurality**, the economic factors affecting media market diversity, transparency and concentration of media ownership, the economic sustainability of media, and the impact of business interests on independence are assessed.

Under **political independence**, regulatory and self-regulatory mechanisms to protect the media from political influence, the independence of the public service media and state activities affecting the media market are analysed.

Finally, under **social inclusiveness**, the state of media literacy and access to media for minorities, marginalised groups, people with disabilities and women are examined.⁷²

The questionnaire for establishing risk scores, consisting of 200 questions (variables), **is completed by a local team of experts** invited by the Centre for Media Pluralism and Media Freedom. The process relies mainly on information gathered through interviews and own data collection.⁷³

⁷⁰ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-1.](#)

⁷¹ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-11.](#)

⁷² [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-1-2.](#)

⁷³ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report 2024. Annex 1. Methodology, pp. A-1, A-4, A-5; Media Pluralism Monitor 2025 questionnaire.](#)

Experts' answers are scored between 0 and 1, with yes/no questions awarded either 0 or 1, while for certain questions answers indicating low (0), medium (0.5) or high (1) risk are available. In addition, for open questions (typically requiring numerical values), replies by the local team are classified into the above risk categories based on predefined thresholds.⁷⁴

Questions may be of a legal, socio-political or economic nature and are grouped into subindicators, indicators and the key areas mentioned above. In each area, there are a total of 50 questions divided into five different indicators. **The final results are obtained by averaging the scores multiple times**: scores of the same type of questions are averaged within subindicators, and their average is the score for the subindicator. Then the score for the indicators is established by calculating the average of the scores for the subindicators, and finally, the average of the scores for the indicators is used to determine the score for each area. The resulting scores are then converted into percentages that determine the risk rating (for example, a score of 0.5 corresponds to 50 percent). In the 2025 report, the square root of the number of questions per type within each subindicator is used to provide a more balanced weighting, given that the number of questions may vary across subindicators.⁷⁵

The 2025 Media Pluralism Monitor report states that **a total of 40 out of 200 questions have been changed or supplemented** since last year, so the comparability of results with previous years is limited.⁷⁶ **The main reason** for the changes to the questionnaire was to **adapt it as much as possible to the new EU regulatory instruments**, such as the EMFA, the DSA and the Directive on Strategic lawsuits against public participation.⁷⁷

As a further change to the methodology, the report mentions that the formula applied to calculate the risk score for the indicator on the plurality of media providers is partially different from the one used for the other indicators. This involves weighting certain subindicators by media consumption in order to take greater account of media sectors with larger audience shares in the final score.⁷⁸

In addition, **changes were made at the level of** individual **indicators and subindicators**.

The area of **fundamental protection** includes a new indicator, the protection of information integrity. This is partly based on the subindicator on regulation against disinformation, which was moved from the area of social inclusiveness. Meanwhile, the

⁷⁴ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-5](#).

⁷⁵ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-11](#).

⁷⁶ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024, p. XIII](#).

⁷⁷ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-13](#).

⁷⁸ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-11](#).

indicator on universal access was moved to the area of social inclusiveness.⁷⁹ For **market plurality**, the indicators are the same as before, with changes occurring only at subindicator and question level, mainly in relation to taking account of the EMFA and the effects of AI on the media economy. However, the area of **political independence** underwent some significant changes, including, in particular, the indicators on editorial autonomy, audiovisual media, online platforms and elections (the latter was renamed "Integrity of political information during elections"). The reason was again to take account of the EMFA framework.⁸⁰

In the questionnaire, "**not applicable**" and "**no data**" answers can be provided, but there is a difference in the scoring of these answers.

The answer "**not applicable**" may be given if the question is inapplicable to the country in question (e.g. for Malta, questions related to regional and local media are considered irrelevant due to size) or is meaningless because of a previous answer (e.g. in the absence of state aid, a question regarding its allocation). Such **responses are nullified in the risk assessment.**

In contrast, "**no data**" answers can be taken into account as lack of data, and as such can be interpreted as a risk, where appropriate. In such cases, the local team of experts decides whether the lack of information is indicative of a transparency issue. Accordingly, "no data" answers can reflect four different risk levels: very low (0), low (0.25), high (0.75) or very high (1). (Examples include indicators on market plurality, since intervention to preserve plurality presupposes the availability of relevant data.) In addition to the four risk ratings, it may also be decided that there are "missing data" merely due to technical reasons, thus it can be excluded from the assessment.⁸¹

Accordingly, it is concluded that **the key contributors to the compilation of the Media Pluralism Monitor are members of the local team who fill in the questionnaire and prepare written country reports.** The report points out that most country teams remained unchanged in 2025 to improve comparability and ensure continuity.⁸²

In addition to the local team, **a group of external experts**, consisting of professional stakeholders and experts, **also participates in the project.** This group **is not involved in scoring or preparing the report;** its primary **responsibility is to assist the local team** with issues requiring qualitative assessment and considered subjective or sensitive. **They may**

⁷⁹ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-13.](#)

⁸⁰ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, pp. A-21-A-22.](#)

⁸¹ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-6.](#)

⁸² [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-4.](#)

comment on the views of the authors of the report, **but local teams do not necessarily have to take this into account**, and may decide to modify or maintain their answers.

Certain country reports, such as the one on Hungary, **are also subject to peer-review** to improve their accuracy. This is carried out by a renowned media researcher for countries that were selected on the basis of the following criteria: quickly evolving situation during the year studied; a change in the composition of the team of local experts; a high-risk evaluation in previous years.⁸³

With regard to the sources used in the project, the description of the methodology states that **both primary sources** (e.g. legislation, interviews and statistical databases) **gathered by the local team and secondary sources** (e.g. NGO reports) **are relied upon**.⁸⁴ In addition, the country report mentions experts consulted, listed in the "References" section, who are not the same as members of the team of external experts.⁸⁵

In addition to the aforementioned methodological changes, **the structure of country reports was also updated** for 2025. In the new format, each country report includes a brief summary called a "results snapshot" and a new chapter called "EMFA Observatory" which studies the legislative environment in each country in the light of the requirements of the EU Regulation. **As a novelty, specific recommendations are also addressed** to different actors (public authorities, governments, media owners, the European Commission, the journalistic community and media service providers).⁸⁶

In addition to the lack of rules governing the selection of its members and the lack of transparency, another issue that arises **in connection with the local team** playing a key role in compiling the Media Pluralism Monitor is **the extent to which we can speak of a pluralistic composition** that allows for the representation of diverse professional views. The team assessing Hungary remained unchanged this year as well; once again, besides a researcher from the project organiser, the European University Institute, only the staff of Mértek Media Monitor was involved in scoring and preparing the country report.⁸⁷

Although the composition of the group of external experts shows greater diversity, it is questionable to what extent the views of its members are reflected in the country report on Hungary, since, as we have pointed out, the description of the project methodology states

⁸³ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-5.](#)

⁸⁴ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-3.](#)

⁸⁵ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 45.](#)

⁸⁶ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, pp. 17, 24, 31 and 39.](#)

⁸⁷ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 54.](#)

that **this lies at the discretion of the local team.**⁸⁸ Additionally, the report indicates that the answers provided by the local team were commented on and verified by the experts for only 16 out of 200 questions.⁸⁹

Regarding the use of sources by Media Pluralism Monitor in its 2024 assessment, it can be established that the report **relies predominantly on a one-sided selection of sources, which calls into question a pluralistic assessment representing diverse views.** A similar conclusion can be drawn with regard to the experts consulted, who are not members of the group of external experts, particularly in respect of members of the media.⁹⁰

It should be noted that in the chapter focusing on compliance with the EMFA prior to its full entry into force, the country report also addresses the independence of the Online Platform Dispute Resolution Board, which was established as a result of the DSA, while this is not related to its subject matter.⁹¹

However, with regard to methodological changes, it should be noted that **increasing the number of risk categories** from three to six **allows for greater differentiation** among the countries, thereby **improving comparability.** In addition, the recommendations addressed to the various media sector actors may be appropriate for facilitating professional dialogue.

2.4. Article 19

Global Expression Report

Published annually, the **Global Expression Report** scores countries for the previous year based on 25 indicators, ranging from 0 to 100, with 100 being the most favourable score. States are ranked according to their expression scores and then classified into one of the five "expression categories", i.e. "**open**" (80 to 100), "**less restricted**" (60 to 79), "**restricted**" (40 to 59), "**highly restricted**" (20 to 39) or "**in crisis**" (0 to 19).⁹² In any case, the evolution of scores is studied over three time horizons; the new results are compared with those from a year earlier as well as those from the previous five and ten years.⁹³

Article 19 does not carry out its own assessment in order to compile the report; rather, the Global Expression Report sums up data for selected indicators from the Democracy Report published annually by the **Varieties of Democracy Institute (V-Dem).**⁹⁴ Based at the University of Gothenburg's Department of Political Science, **V-Dem** describes itself as an

⁸⁸ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor General Report on 2024. Annex 1. Methodology, p. A-5.](#)

⁸⁹ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 54.](#)

⁹⁰ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 45.](#)

⁹¹ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 40.](#)

⁹² [Article 19: Global Expression Report 2025. About](#)

⁹³ [Article 19: Global Expression Report 2025. Methodology.](#)

⁹⁴ [Article 19: Global Expression Report 2025. Methodology.](#)

independent research institute and **seeks to assess the state of democracy around the world** with the help of over 4,200 experts and 600 indicators. Its list of supporters includes Facebook, the European Commission, the Open Society Foundation and Volkswagen Stiftung.

Approximately **half the indicators** used by V-Dem **are based on official documents**, such as government records or legislation, presenting factual information. The other indicators **require a more subjective assessment** and are studied by experts invited by the research institute, typically 25 per country. They have to meet **requirements on expertise and impartiality**.⁹⁵

V-Dem **seeks to eliminate risks resulting from the subjectivity of experts** by applying the so-called **Bayesian measurement model**, improving comparability over time and across countries. The reason for this is that the perception of certain issues may be different from person to person and from case to case, and may vary systematically between groups of experts. To address this, **responses from experts are aggregated and then, taking into account uncertainties and possible biases**, an algorithm is used to estimate to what extent an expert's response diverges from their peers and how reliable it is. Accordingly, **contributions from the experts involved are then weighted to decide to what extent the opinions of each expert are taken into account**.⁹⁶

The indicators assessed consist of a single question to which each expert typically responds by choosing from four or five predefined options the one that best describes the country in question.⁹⁷ Article 19 **aims to study freedom of expression in a comprehensive manner**, which is reflected in the selected indicators. Accordingly, in addition to issues related to the state of media freedom (harassment of journalists, level of government and self-censorship), it also covers areas such as the banning of party organisations, action against civil society organisations, freedom of religion and the right of assembly. This practice is underpinned by the intention to assess whether the freedom of expression is upheld not only for journalists and activists, but for all citizens.⁹⁸

In addition to the expression score, a **so-called “human score” is published** to assess the state of freedom of expression both globally and for each region. In order to ensure proportionality when determining these scores, **countries are considered by assigning a weight based on their population**.⁹⁹

Given that Article 19 does not collect data independently when compiling the Global Expression Report, **the methodology of the V-Dem project was examined**. Although the organisation **engages a high number of experts** (typically 25 per country, 4,200 in total) in its research to ensure its professional soundness, **these experts are not identified**.¹⁰⁰ This

⁹⁵ [V-Dem: The V-Dem Project](#).

⁹⁶ [V-Dem: V-Dem Methodology](#).

⁹⁷ [Article 19: Global Expression Report 2025. Indicator descriptions](#).

⁹⁸ [Article 19: Global Expression Report 2025. Indicator descriptions](#); [Article 19: Global Expression Report 2025. Methodology](#).

⁹⁹ [Article 19: Global Expression Report 2025. Methodology](#).

¹⁰⁰ [The V-Dem Project](#).

practice **impairs the transparency of the report**, as it raises the question whether the selection ensures an impartial, pluralistic composition for each state.

In recent years, **some academic research has also suggested that the underlying data in publications** assessing democracy, such as the V-Dem report, **may be biased or flawed**. Andrew T. Little, Associate Professor of Political Science at UC Berkeley, and Anne Meng, Associate Professor of Politics at the University of Virginia, pointed out in their joint study that subjective **indicators**, i.e. those **relying on responses from experts, can show wide discrepancies in how certain concepts are perceived** (for example, in what circumstances an electoral system can be considered "fundamentally flawed"). According to the authors, this is also demonstrated by discrepancies of up to 20 to 25 percent, which can mean a score difference of up to 1 on a scale of 0 to 4.

With regard to the Bayesian model used by V-Dem, Meng and Little acknowledge that it can reduce the risk of certain countries appearing less democratic due to any unconventional selection of experts, **but fails to eliminate the phenomenon of the so-called "time-varying bias"**. This is what the authors call the case where a growing number of news reports about democratic backsliding create a misleading picture for the experts engaged by V-Dem. **This may partly explain why democracy indicators derived from subjective data have shown a decline in recent years, while objective indicators have not.** The above observations are particularly relevant in the case of the Global Expression Report where a significant number of the indicators used are subjective and based on responses from experts.¹⁰¹

Jonas Wolff, Professor at the Goethe University Frankfurt, **has further criticised** V-Dem reports. In one of his articles, Wolff **writes** that the research institute has increasingly **moved away from its initial understanding of democracy, which emphasised the different varieties of democracy**, as the full name of the organisation (Varieties for Democracy Institute) suggests. According to the V-Dem project, there are at least five types of democracy (*electoral; liberal; participatory; deliberative; egalitarian*); however, the research institute increasingly considers only one of the possible types (*liberal*) as the benchmark, and thus deems any departure from it as autocratisation.¹⁰²

2.5. European Centre for Press and Media Freedom

Mapping Media Freedom – Monitoring Report

The Monitoring Report **does not contain a separate description of its methodology**; however, it is stated that the report is based on incidents from the previous year.¹⁰³ It **is divided**

¹⁰¹ Andrew T. Little, Anne Meng: *Measuring Democratic Backsliding*. PS: Political Science & Politics. 11. 01. 2024.

¹⁰² Jonas Wolff: *From Varieties of Democracy to the defense of liberal democracy: V-Dem and the reconstruction of liberal hegemony under threat*. Contemporary Politics. 06. 07. 2022.

¹⁰³ [Mapping Media Freedom: Monitoring Report 2024, p. 51.](#)

into an overview of general trends in press freedom violations **and subsections assessing each country** (12 in 2025).¹⁰⁴

The data presented in this publication **are based on the reporting project's online database** designed to document press and media freedom violations. According to the methodology of the database, each incident is published following a multi-step process.

The ECPMF **collects information on incidents in three ways**: in cooperation with professional organisations, through online reporting and by using an AI tool capable of detecting press and media freedom violations in social media posts and the news. **Prior to publication, the organisation's experts validate the identified cases** by checking sources, gathering additional information on other platforms, and engaging directly with those concerned.¹⁰⁵

The ECPMF database **categorises identified cases based on the type, source, context of the attack and the people concerned**. Those concerned are further grouped on the basis of their gender, employment status and type. **Incidents are also accounted for separately based on certain topics** (such as the coronavirus pandemic, environmental protection, racism and attacks based on gender or sexual orientation).¹⁰⁶

The database **mainly covers cases of physical assault, harassment, psychological abuse, attacks on property, censorship and legal atrocities**. In addition to cases involving journalists, the study also covers threats against the owners of media companies; individuals attacked because of their relationship with journalists; attacks against civil society organisations; and measures affecting the media (such as the adoption of legislation restricting freedom of speech).¹⁰⁷

The methodology may be criticised for **the lack of a list of authors in the publication**, only mentioning the fact that the ECPMF, the European Federation of Journalists and the International Press Institute contributed to its compilation within the framework of the MFRR mechanism.¹⁰⁸ This practice **reduces the transparency of the compilation of the document**.

With regard to the incidents in the database referenced by the report, it can also be noted that the report **typically relies on one-sided selection of sources that calls into question the plurality of the assessment**. The publication refers to a low share of newspapers presenting opposing views; however, these are often identified as media outlets actively involved in the incidents.

The database relies mainly on secondary sources, such as articles describing the incidents. Primary sources such as documents from public authorities or social media

¹⁰⁴ [Mapping Media Freedom: Monitoring Report 2024, p. 6.](#)

¹⁰⁵ [Mapping Media Freedom: Methodology.](#)

¹⁰⁶ [Mapping Media Freedom: Methodology.](#)

¹⁰⁷ [Mapping Media Freedom: Methodology.](#)

¹⁰⁸ [Mapping Media Freedom: Monitoring Report 2024, p. 7.](#)

posts by relevant public figures are less prominent.¹⁰⁹ Annual reports also include hyperlinks, typically to the aforementioned project database or, in some cases, to statements released by other organisations involved in the preparation of the report, such as the International Press Institute.

The comparability of the data presented for each state **is hampered by the failure of the report to show the number of incidents per capita**. Ignoring this would lead to distortion, as potentially higher values for larger states may be related to the larger size of their populations.

Even the report itself points to this shortcoming: "*the state of media freedom in various countries cannot be compared based on the number of alerts recorded alone, and alert numbers should not be interpreted as a ranking of countries.*"¹¹⁰

For certain categories, the classification practice of incidents is questionable: for example, the report classifies all lawsuits against media outlets as legal attacks, regardless of the findings of the courts or the outcome of the cases.

It is unclear what methodological criteria were applied to select which countries to present in separate subsections. In this context, the report only mentions that "*these countries were selected based on recent, worrying developments which are not necessarily reflected in the number of alerts recorded*".¹¹¹

2.6. Safety of Journalists Platform

Europe Press Freedom Report

The Safety of Journalists Platform **has published alerts for cases of abuse of journalists' rights and media freedom** in Council of Europe member states, Russia and Belarus **on its website since 2015**, with quantitative summaries broken down by country, type, date and status of the cases identified, as well as the reporting organisation.¹¹² **Data is collected, systematised and published by participating organisations** according to their own procedures and professional standards. Under the agreement establishing the platform, these **organisations have undertaken to publish reliable and evidence-based information** and refrain from publishing legal assessments and opinions. Although **the Council of Europe does not edit the content published by the organisations**, it reserves the right to remove posts that do not comply with the above conditions. This shows that the **partner organisations are responsible for the technicality of such tasks**, while the Council of Europe merely provides them with a publication platform and uses the results.¹¹³ In addition to the organisation's

¹⁰⁹ [Mapping Media Freedom: Incidents](#).

¹¹⁰ [Mapping Media Freedom: Monitoring Report 2024](#), p. 30.

¹¹¹ [Mapping Media Freedom: Monitoring Report 2024](#), p. 30.

¹¹² [Council of Europe. Safety of Journalists Platform: Alerts](#).

¹¹³ [Council of Europe. Safety of Journalists Platform: Memorandum of Understanding on the Setting-Up of an Internet-Based Freedom of Expression Platform to Promote the Protection of Journalism and Safety of Journalists](#), 04. 12. 2014, pp. 3-4.

website, information is also made available in annual reports. The publication has been released under various names since 2019; **the report published in 2025 is called Europe Press Freedom Report.**¹¹⁴

Alarms can be classified as level one or level two according to their severity. The **former category** covers the **most serious violations** of media freedom. This includes attacks and threats against journalists, imprisonment of members of the media or the arbitrary shutdown of media companies. The **latter category covers other abuses that are also considered serious**, such as threatening or severe verbal abuse against members of the media by public figures or legislation that unduly restricts media freedom and access to information.¹¹⁵

In September 2024, a **new aspect was added** to the identification of issues threatening media freedom: **systemic alerts** were added to the system that previously only recorded individual cases, in order to raise awareness of structural problems. In this regard, **two groups of cases are currently being recorded: those relating to the state of public service media and those relating to legislation on defamation.** Eight countries are mentioned in the former category: Hungary, Turkey, Slovakia, Georgia, Bosnia and Herzegovina, Azerbaijan, Russia and Belarus. The latter includes 11 countries: Italy, Greece, the United Kingdom, Azerbaijan, Russia, Belarus, Turkey, Serbia, Poland, Ireland and Croatia.¹¹⁶

The following types of abuse are distinguished: (1) attacks on the integrity and physical safety of journalists; (2) detention and imprisonment of journalists; (3) harassment and intimidation of journalists; (4) impunity; and (5) other acts having chilling effects on media freedom.¹¹⁷

Alerts **are reported to the states concerned**, which are expected to take various preventive, protective or remedial measures. The **status of each alert (pending, resolved** or, in the case of state inaction, **active**) is determined on this basis.¹¹⁸

As for the 2025 report, **its methodology can be criticised for not fully complying with Article 5 of the cooperation agreement establishing the Safety of Journalists Platform, which requires partner organisations to refrain from publishing their opinions.**¹¹⁹ Contrary to the aforementioned article, the report states that the opinions expressed in it are the responsibility of the authors and do not necessarily reflect the official position of the Council of Europe.¹²⁰ It

¹¹⁴ [Council of Europe. Safety of Journalists Platform: Reports.](#)

¹¹⁵ [Council of Europe. Safety of Journalists Platform: Alerts.](#)

¹¹⁶ [Council of Europe. Safety of Journalists Platform: Systemic Alerts.](#)

¹¹⁷ [Council of Europe. Safety of Journalists Platform: Alerts.](#)

¹¹⁸ [Council of Europe. Safety of Journalists Platform: Alerts; Council of Europe. Safety of Journalists Platform: Who we are; Memorandum of Understanding on the Setting-Up of an Internet-Based Freedom of Expression Platform to Promote the Protection of Journalism and Safety of Journalists. 04. 12. 2014, pp. 3–4.](#)

¹¹⁹ [Council of Europe: Memorandum of Understanding on the Setting-Up of an Internet-Based Freedom of Expression Platform to Promote the Protection of Journalism and Safety of Journalists. 04. 12. 2014, p. 3.](#)

¹²⁰ [Council of Europe. Safety of Journalists Platform – Annual Report 2025, p. 2.](#)

is also problematic that **the identities of the authors of the report are not disclosed**, only a list of the partner organisations involved in its compilation is provided.

The report mainly refers to alerts received from and reports prepared by partner organisations, but **typically does not include primary sources suitable for a pluralistic coverage of events**.

A number of steps should be considered to improve comparability of the data on abuses of media freedom published on the Safety of Journalists Platform. One of these is that in addition to removing disclosures that do not comply with the essential requirements, the Council of Europe should also check as to what extent the criteria for identifying alerts were consistent across the states. Consideration should also be given to making the number of alerts comparable on a population size basis.

2.7. International Press Institute – Media and Journalism Research Center

Media Capture Monitoring Report

The Media Capture Monitoring Report **assesses each state in four key areas**: independence of public service media; independence of media regulator(s); misuse of state funds to influence media output; media pluralism and political influence over news media.

For **the independence of public service media**, the editorial and functional independence of public service media is analysed, examining, for example, the framework for public service media funding, the roles of relevant authorities, and the procedures for the appointment and dismissal of the heads of public service media outlets.

The second topic **provides an overview of the autonomy and effectiveness of media authorities**. In this context, an assessment of, for example, the availability of the necessary financial, human and technical resources and investigative powers, as well as coordination and consultation processes with other authorities or relevant bodies is provided.

The third area **focuses on the transparency and objectivity of the allocation of public funds for state advertising**, evaluating whether such funds are awarded on the basis of non-discriminatory criteria and to what extent information is accessible to the wider public.

Finally, the fourth topic **addresses the transparency of media ownership and the impact of media concentration on media pluralism and editorial independence**. This includes an analysis of relevant national laws, related practices of public authorities and the impact of political factors on market dynamics and media ownership.¹²¹

According to a brief **description of the methodology** in the reports, a “**national country team**” consisting of media professionals **completes a questionnaire of over 50 questions**

¹²¹ [Media and Journalism Research Center: Media Capture Monitoring Report. Project overview and research design.](#)

covering the aforementioned areas. For each of the four topics, two groups of questions can be identified: control questions focusing on the implementation of the EMFA and assessing the effectiveness of its implementation.

The **data necessary** to compile the report **is collected by the national country team**, relying mainly on secondary sources such as academic research and NGO reports, supplemented by primary data from document analysis and interviews. In addition, the Eurostat database is also used where relevant data is available. The MJRC monitors the quality and consistency of the collected data and the applied methodology.¹²²

The methodology used for the reports elicits a number of comments. As indicated above, the organisation claims that the necessary data are collected by a country team, but **the publication assessing Hungary in 2025 only names a single author** (as opposed to, for example, Finland, where three are named), as it did a year earlier.¹²³ As a result, it is unclear how the roles of the aforementioned team and the author relate to each other in the preparation of the report. **It raises the question as to whether the author is the only member of the country team investigating Hungary or whether other people are also involved.** In the absence of this information, it is also **uncertain whether the group of assessors was assembled in pluralistic manner.**

As regards the use of sources, it can be argued that the report **largely refers to assessments by newspapers and organisations that present a biased view of the media landscape in Hungary.** In addition, it is noted that the report seeks to support its findings in a number of instances by referring to other media freedom reports instead of citing primary sources.¹²⁴

In conclusion, it can be said that the **2025 publication largely repeats the wording in the previous year's edition.**

3. Hungary's scores and rankings in the reports reviewed

Among the media freedom reports presented here, the **Freedom in the World, Freedom on the Net, World Press Freedom Index, Media Pluralism Monitor, Global Expression Report, Mapping Media Freedom – Monitoring Report and Europe Press Freedom Report** provide quantitative assessments and rankings for Hungary.

3.1. Freedom House

According to the **Freedom in the World** country report, Hungary's **score remained unchanged** both in the overall assessment (65) and for **the media independence indicator** relevant for the present analysis (2). The latter result has been the same every year since the

¹²² [Media and Journalism Research Center: Media Capture Monitoring Report. Methodology.](#)

¹²³ [Media and Journalism Research Center: Media Capture Monitoring Report. Country Reports.](#)

¹²⁴ See, for example: [Media Capture Monitoring Report 2025 – Hungary. IPI, MJRC, pp. 8–9 and 12.](#)

current methodology was introduced in 2018, and it is below the results of the Visegrad countries this year as well.¹²⁵

In the **Freedom on the Net** report, **Hungary also achieved the same score of 69 as in 2024**, and thus continues to be rated as "partly free" by the organisation preparing the publication.

However, **there were changes in the subscores for certain indicators**. There was a **one-point decrease in limits on content**, which the organisation attributed to the impact a constitutional amendment banning LGBTQ+ events had on online organising. The overall score was the same as in 2024 because **the score in the area of violations of user rights increased by one point**, following a decline in the number of reported cyberattacks against online media outlets during the coverage period, according to the report.¹²⁶

The 2025 report **examined only Ukraine and Serbia among the countries bordering Hungary**. Hungary's southern neighbour had previously received a more favourable score but this time it was ranked behind Hungary. Ukraine's score remains significantly lower.¹²⁷

3.2. Reporters Without Borders

In this year's evaluation in the **World Press Freedom Index**, **both the score and ranking of Hungary deteriorated slightly compared to last year**, as it was ranked 68th, down from 67th, and its score declined from 62.98 to 62.82.¹²⁸ As such, Hungary is only ahead of Serbia, ranked 96th, among neighbouring countries, and Bulgaria, Cyprus and Greece among EU Member States.¹²⁹

3.3. Centre for Media Pluralism and Media Freedom

The **Media Pluralism Monitor**'s latest report for the year 2024 gave Hungary **a risk score of 74.25 percent, rounded to 74 percent**, which represents a deterioration of one percentage point over the previous year, and corresponds to the score achieved two years earlier. As a result, **Hungary was the only EU Member State to be classified in the high-risk category, and thus ranked in last place**.

In the area of fundamental protection, the score fell significantly by 10 percentage points (from 57 to 66 percent), corresponding to a medium-high risk level. **The report's assessment of market plurality also deteriorated** from 83 percent in 2023 to 86 percent, which is considered very high risk under the new categorisation. Once again, the Media Pluralism Monitor gave **a high risk score of 80 percent for political independence**. However, **there was a 5 percent improvement in social inclusiveness**, where the score of 65 percent falls in the medium-high category. On this basis, Hungary

¹²⁵ [Freedom House: Freedom in the World 2025 – Hungary](#); [Freedom House: Freedom Map. Freedom in the World](#).

¹²⁶ [Freedom House: Freedom on the Net 2025 – Hungary](#).

¹²⁷ [Freedom House: Freedom Map. Freedom on the Net](#).

¹²⁸ [Reporters Without Borders: Country fact-file: Hungary](#).

¹²⁹ [Reporters Without Borders: World Press Freedom Index](#).

received the highest risk rating within the European Union in all areas with the **exception of social inclusiveness** (with the same score as Romania for market plurality).¹³⁰

3.4. Article 19

In the Global Expression Report's ranking for 2024, published by Article 19, **Hungary is ranked 88th with a score of 50**. This represents a decline from last year's 83rd position and score of 52. Thus, Hungary was the only EU Member State to be classified in the "restricted" expression category.

Hungary was 39th in the standalone ranking in the regional report covering 46 European and Central Asian countries. Only countries categorised as "highly restricted" and "in crisis", such as Ukraine, Kyrgyzstan, Turkey and Russia, received a worse rating in the region.¹³¹

Hungary also ended up in unfavourable positions for indicators analysing media freedom only: 90th for government censorship, 87th for harassment of journalists and 110th for self-censorship.¹³²

3.5. European Centre for Press and Media Freedom

The 2024 **Mapping Media Freedom – Monitoring Report**, published by the European Centre for Press and Media Freedom in February 2025, **identified 68 incidents in relation to Hungary**, 19 more than in 2023.¹³³ The 2024 cases involved a total of 150 persons or entities. Nearly half the cases (45.6 percent) were linked to censorship and interference in the work of the media, and government and state officials were responsible for nearly a quarter of the incidents (23.5 percent), according to the report.¹³⁴ The above aggregate result is **the worst indicator among the Visegrad countries**.¹³⁵

3.6. Safety of Journalists Platform

At the time of concluding this analysis, the database of the Safety of Journalists Platform **contains a total of 36 active alerts for Hungary, the second highest among the Visegrad countries** after Poland. In addition to active alerts, the platform also keeps track of resolved cases. In this comparison, Hungary comes in last, as there is no such case in the records.¹³⁶

¹³⁰ European University Institute, Centre for Media Pluralism and Media Freedom: [Media Pluralism Monitor 2025. Interactive data](#).

¹³¹ Article 19: [Global Expression Report 2025. Europe and Central Asia](#).

¹³² Article 19: [Global Expression Report 2025. Media Freedom worldwide](#)

¹³³ [Mapping Media Freedom: Monitoring Report 2023](#), p. 5.

¹³⁴ [Mapping Media Freedom: Monitoring Report 2024](#), pp. 34–35.

¹³⁵ [Mapping Media Freedom: Incidents](#).

¹³⁶ Council of Europe. [Safety of Journalists Platform: Alerts](#).

4. Factual errors and subjective opinions about Hungary

A recurring theme of the reports under review **was questioning the independence of the NMHH and the Media Council.** According to the publications by Liberties, "although formally established as an independent body, [the NMHH] continues to be subject to extreme government influence."¹³⁷ The current Media Pluralism Monitor makes a similar point, challenging the independence of the Media Council, including **by criticising the rules on the election of its members.**¹³⁸ Corresponding claims are also made in the 2025 edition of the Media Capture Monitoring Report and the country fact file by Reporters Without Borders.¹³⁹

Contrary to what is stated in the reports, under the Media Act, **the NMHH is an autonomous regulatory agency, subordinated solely to the law, and exercises its powers and jurisdiction independently** in accordance with the law.¹⁴⁰

Similar guarantee rules are laid down in the Media Act in relation to the **Media Council**, which **is an independent body of the Authority reporting to the Parliament**, its **members are subject only to the law** and **cannot be instructed within their official capacity**. **The election** of the members of the Media Council and its chairman **is governed by strict procedural and conflict of interest rules.**¹⁴¹ Furthermore, the Act provides that the President of the NMHH may not be instructed in any way with respect to their actions and decisions associated with discharging their duties and exercising their powers, and may not give any instructions regarding individual decisions in official matters.¹⁴²

Even though the two-thirds parliamentary mandate grants greater discretionary room, it does not follow that any body independent of the government is under the control of the executive. In this context, it should also be noted that, **in several EU Member States, the election and appointment** of bodies similar to the Hungarian Media Council **are governed by rules that do not require a qualified majority in the legislature**. Reference is made to Ireland where the competent minister, i.e. a member of the executive, is empowered to appoint the members of the Coimisiún na Meán.¹⁴³

A number of publications criticised the state of media pluralism in Hungary, reporting on the dominant market position of media identified by them as pro-government. According to the 2025 edition of Freedom in the World reports, "*while privately owned opposition-aligned media outlets exist, national, regional and local media are dominated by pro-government*

¹³⁷ [Liberties: Rule of Law Report 2025, p. 441](#); [Media Freedom Report 2025, p. 37](#).

¹³⁸ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 16](#).

¹³⁹ [Reporters Without Borders: Country fact-file: Hungary](#); [Media Capture Monitoring Report 2025 – Hungary. IPI, MJRC, p. 9](#).

¹⁴⁰ Section 109 of the Media Act.

¹⁴¹ Sections 123 to 127 of the Media Act.

¹⁴² Section 123 and 111(6) of the Media Act.

¹⁴³ [Broadcasting Act 2009, Section 11](#).

outlets".¹⁴⁴ Similar criticisms are found in the current fact file by Reporters Without Borders and the 2025 edition of the Media Freedom Report published by Liberties.¹⁴⁵

Contrary to what the reports claim, **the domestic media market is diverse, with media outlets representing different views included among the most important players.** As shown in the NMHH Media Market Report 2025, RTL's news programmes, generally considered critical of the government, continue to be among the most popular in the television market.¹⁴⁶ With regard to the online space, which is crucial as a source of information, it is concluded that **the most visited online outlets also included several sites that were considered critical of the government.**¹⁴⁷ Participants in the NMHH's survey **cited Facebook** (50 percent of respondents), **YouTube** (32 percent), **index.hu** (23 percent), **telex.hu** (21 percent) **and 24.hu** (19 percent) as the top five **most frequent online news sources.**¹⁴⁸ In light of the above, it should be noted that there are also a high number of channels with high viewership among political platforms on YouTube that present divergent views. The Media Market Report 2025 shows that the most popular content producers among them are the channels of telex.hu, Partizán and 24.hu.¹⁴⁹

The **Liberties Media Freedom Report** echoes the claim made by the **Rule of Law Report in its country report on Hungary** that "*Since Hungarian media regulation does not impose restrictions on media company ownership, large media conglomerates can emerge.*"¹⁵⁰

Contrary to the aforementioned claim, the Media Act **establishes as a fundamental principle the prevention of the formation of an ownership monopoly and the undue restriction of competition in the market.** In addition, the Act **contains explicit provisions to prevent market concentration:** for linear audiovisual and linear radio media service providers – other than thematic commercial media service providers – with a defined average annual audience share, the law prohibits the owner, or any person or undertaking with a controlling interest in any owner of the media service provider, from launching a new media service or acquiring any stake in a media service provider. Under the law, the Media Council is required to deny regulatory consent in cases where the service provider intends to acquire a share in a media service provider that is covered by the restriction described above. The Media Act also imposes additional obligations on the owners concerned to increase media market diversity (e.g. to change programme structure, increase the share of programmes produced by Hungarian and independent producers).¹⁵¹

¹⁴⁴ Freedom House: Freedom in the World 2025 – Hungary. Question D1.

¹⁴⁵ Reporters Without Borders: Country fact-file: Hungary: Liberties – Media Freedom Report 2025, p. 14.

¹⁴⁶ NMHH: Media Market Report 2025, p. 178.

¹⁴⁷ NMHH: Media Market Report 2025, pp. 100–101.

¹⁴⁸ NMHH: Media Market Report 2025, p. 181.

¹⁴⁹ NMHH: Media Market Report 2025, p. 184.

¹⁵⁰ Liberties: Rule of Law Report 2025, p. 442; Media Freedom Report 2025, p. 14.

¹⁵¹ Sections 4 and 67–68 of the Media Act.

The proceedings of the Media Council as the Authority of Competence in merger investigations conducted by the Hungarian Competition Authority (GVH) **is examined by several reports**. In this context, the current edition of the Media Pluralism Monitor states that the "**The Media Council's opinion is binding on the Hungarian Competition Authority**".¹⁵² The same conclusion is reached in the current editions of the Media Freedom Report and Rule of Law Report by Liberties.¹⁵³

The above conclusions in those reports are considered inaccurate, as the Media Authority's opinion is indeed binding on the GVH; this, however, does not preclude the GVH "*from prohibiting a merger from being concluded that is already officially approved by the Media Council, irrespective of any condition the Media Council may have imposed, or from imposing a condition or an obligation to implement a commitment [...] that the Media Council failed to impose.*"¹⁵⁴ It follows that **the GVH may not clear a concentration** in the relevant market of media content service **without the consent of the Media Council but it may prevent it even where consent has been given**.

Both **the Rule of Law Report** and **the Media Freedom Report** mention the 2024 **amendment to the Criminal Code**: "*a new draft law criminalising hateful comments was put forth*". They **criticise this new offence type, claiming that** "*especially with regard to its apparently broad application, there is great concern that it can potentially undermine freedom of expression.*"¹⁵⁵

The reports by Liberties are misleading in that the aforementioned amendment **does not criminalise hateful comments** under the new offence type of online aggression, but rather **the publication or use of any expression, representation, image or audio recording** which expresses **an intention or purpose to commit a criminal offence of causing loss of life** or with particular cruelty to **an identifiable person or persons**. The Act makes an important exception for members of the media by providing that the act of publishing or using such content to report on current events shall not be liable for prosecution, provided that the act is incapable of intimidation.¹⁵⁶

According to the reports published this year **by Liberties**, "**new media-like platforms and actors are emerging that fall outside the scope of existing media regulations**". As an **example** in this context, **they mention** **Holy Crown Radio (Szent Korona Rádió)**, noting that "*Although it resembles official media websites, it is not listed as a press product by the NMHH, meaning its founders and ownership details are not accessible*". Referring to the register of print and online press outlets kept by the NMHH, they object to the fact that this outlet is not included therein because, as a result, "*no rectification or personality right procedures can be*

¹⁵² European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, pp. 19 and 42.

¹⁵³ Liberties: Rule of Law Report 2025, p. 442; Media Freedom Report 2025, p. 14.

¹⁵⁴ Section 171 of the Media Act.

¹⁵⁵ Liberties: Rule of Law Report 2025, p. 447; Media Freedom Report 2025, p. 41.

¹⁵⁶ Section 332/A of the Criminal Code.

initiated against its content, leaving it outside the law with no regulations to limit its activities". They criticise the NMHH by claiming that "To date, the NMHH has not taken any action to regulate the blog".¹⁵⁷

Within the conceptual structure of Hungarian media regulation, **press products are defined as "the individual volumes of newspapers and other periodicals, as well as online journals and news portals, provided as an economic service under the editorial responsibility of a natural or legal person, and the principal purpose of which is the provision of content containing text and/or images – in order to inform, entertain or educate – to the general public in printed format or by electronic communications networks."** In this context, the Hungarian courts have developed a standard case-law in recent years, as both the **Constitutional Court** and the **Curia of Hungary have held** that "**blogs are considered primarily private communication channels**" that can only be subject to the rules applicable to the press in exceptional cases where the statutory conditions for the definition of a press outlet are "*fully and undoubtedly*" met.¹⁵⁸

The Media Freedom Report 2025 concludes that "**there are no major regulatory restrictions or safeguards for the online media ecosystem**".¹⁵⁹

As indicated in relation to the regulation of blogs, the Media Act and the Press Act provide that **online newspapers and news portals are also considered press products if they meet the statutory conditions**, and, accordingly, **the provisions on press products also apply to them**.¹⁶⁰ In addition, in the case of online press products, the Media Act even imposes a separate rate of fines.¹⁶¹ **Media content regulation also applies to media service providers in the online segment**. A recent example to illustrate this point is the penalty imposed on the YouTube channel Partizán by the Media Council in November 2025, after content published on the platform violated the statutory provision prohibiting the publication of media content suitable for the exclusion of a community. On this basis, the above statement cited from the report is incorrect.¹⁶²

According to the Rule of Law Report 2025, "**Although the media law establishes a co-regulatory system to involve journalist organisations in media-related decisions, these organisations have not been given a meaningful role**". In addition, the document states that "*Self-regulatory bodies in Hungarian media remain weak and lack influence, while most journalist associations remain largely inactive throughout the year.*"¹⁶³

¹⁵⁷ [Liberties: Rule of Law Report 2025, p. 443](#); [Media Freedom Report 2025, p. 21](#).

¹⁵⁸ Section 1(6) of the Press Act; Section 203(60) of the Media Act; [Decision 165/2011 \(20 December\) of the Constitutional Court](#); BH2020. 148. ([Curia Decision in civil review case No. IV. 21.876/2018](#)).

¹⁵⁹ [Liberties: Media Freedom Report 2025, p. 41](#).

¹⁶⁰ Section 1(6) of the Press Act; Section 203(60) of the Media Act.

¹⁶¹ Section 187(4)(f) of the Media Act.

¹⁶² [NMHH: Media Council imposes penalty for exclusion of a community. 06.11.2025](#).

¹⁶³ [Liberties: Rule of Law Report 2025, pp. 441–442](#).

When examining co-regulation, it should be noted that **the EU AVMS Directive provides that Member States shall encourage the use of co-regulation**.¹⁶⁴

Accordingly, the Media Act also created a co-regulatory system under which self-regulatory organisations and the Media Council enter into an administrative contract containing a cooperation agreement, which is essentially a private instrument with elements of public law. The regulation enables **the authority to empower the co-regulatory body to act in a self-management manner on behalf of the Media Council in respect of certain statutory regulatory powers**, while not conferring administrative and executive powers, **vis-à-vis its members** and all those who voluntarily agree to be subject to the co-regulatory procedure.¹⁶⁵

Under the legislation, **the authority may empower self-regulatory bodies to manage the following types of administrative cases**: exercise supervision as to the rules of the Press Act laying down obligations for print and online press outlets and on-demand media services; supervising the rules on the content of media services laid down in the Media Act for on-demand media services; and the fostering, enforcement and supervision of commercial communications for alcoholic beverages with regard to on-demand media services.¹⁶⁶

The effectiveness of the system is demonstrated by the fact that **four organisations signed administrative contracts soon after its launch in 2011**.¹⁶⁷ One example is the contract between the Authority and the Association of Hungarian Content Providers (MTE), under which the Association, in carrying out self-governing tasks prior to the application of the law by the Media Council, is entitled to take action against media content providers that are subject to the Code of Conduct – which is annexed to the contract – on grounds of, *inter alia*, the protection of human dignity, right of informational self-determination, minors, constitutional order and human rights, and the prohibition of incitement to hatred against and the exclusion of communities.¹⁶⁸ The Authority provides annual support for the operation of the organisations and for conducting sectoral research and monitoring studies on specific market segments.¹⁶⁹ It

¹⁶⁴ [Article 4a of the AVMS Directive; Prior to the 2018 amendment of the Directive, Article 4\(7\) contained the relevant provision.](#)

¹⁶⁵ Lapsánszky, András: *Társzabályozás és önigazgatás a médiaigazgatásban* (Co-regulation and self-governance in media administration). in: Koltay, András, editor: *Magyar és európai médiajog* (Hungarian and European Media Law). Complex Kiadó. Budapest. 2019, p. 986; Section 192 of the Media Act.

¹⁶⁶ Lapsánszky, András: *Társzabályozás és önigazgatás a médiaigazgatásban* (Co-regulation and self-governance in media administration). in: Koltay, András, editor: *Magyar és európai médiajog* (Hungarian and European Media Law). Complex Kiadó. Budapest. 2019, p. 989; Section 192(2) of the Media Act.

¹⁶⁷ [NMHH: Media Council summarises co-regulation experiences with professional media organisations 06.07.2012.](#)

¹⁶⁸ [Administrative contract concluded on 29 June 2011 between the Media Council of the National Media and Infocommunications Authority and the Association of Hungarian Content Providers for the performance of media administration tasks, Annex 1. pp. 3–5.](#)

¹⁶⁹ [NMHH: Report to the Parliament on the activities of the Media Council of the National Media and Infocommunications Authority in 2022, p. 119.](#)

is concluded that **the active contribution of professional organisations facilitates the effective performance of the Media Council's functions.**

With regard to the Online Platform Dispute Resolution Board, the annual report of the Media Pluralism Monitor published in 2025 **states that it is "not an independent body, as required by the Digital Services Act (Art. 21), but an institution directly operated by the media authority NMHH".**¹⁷⁰

The Media Pluralism Monitor misrepresents the requirements laid down in the Digital Services Act (DSA). Under its provisions, an out-of-court dispute settlement body must be independent from the digital service providers and their users but not from the certifying Digital Services Coordinator, i.e. in Hungary's case the NMHH.¹⁷¹ As an example, **the dispute resolution body** accredited by the **Austrian** Digital Services Coordinator, *die Kommunikationsbehörde Austria (KommAustria)*, is **RTR-GmbH, Fachbereich Medien.**¹⁷² It describes itself as **the administrative body of KommAustria, supporting the performance of that Authority's functions.**¹⁷³ The 2025 country report on Austria does not criticise this.¹⁷⁴

It is also important to note that NMHH **Decree 4/2024** (21 March) on the detailed rules for out-of-court dispute resolution bodies that **established the Online Platform Dispute Resolution Board sets out clear professional and conflict-of-interest rules** for members of dispute resolution bodies, in line with the requirements of the DSA.¹⁷⁵

Media Pluralism Monitor also criticises the amendment to Act CXXVII of 2007 on Value Added Tax (hereinafter referred to as "**the VAT Act**"), in force as of 2024, **which reduced the VAT rate for daily newspapers** published at least four times a week **to zero percent.** It claims that this "**disproportionately benefits pro-government media**". However, the report also noted that the Hungarian Publishers' Association, which proposed the measure, successfully advocated for the interests of media companies it represented, adding that "*there were no complaints by representatives of independent media outlets about this scheme*".¹⁷⁶

The introduction of a zero VAT rate is made possible by Directive 2022/542/EC, published by the Council of the European Union on 5 April 2022, which amended Directive 2006/112/EC on the common system of value added tax. **It allows Member States to**

¹⁷⁰ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, pp. 12 and 40.](#)

¹⁷¹ [Recital \(59\) and Article 21 of the DSA.](#)

¹⁷² [European Commission: Out-of-court dispute settlement bodies under the Digital Services Act \(DSA\)](#)

¹⁷³ [Die RTR Medien](#)

¹⁷⁴ [European University Institute, Centre for Media Pluralism and Media Freedom – Media Pluralism Monitor 2024 report on Austria, p. 12.](#)

¹⁷⁵ Section 2 of NMHH Decree 4/2024 (21 March).

¹⁷⁶ [European University Institute, Centre for Media Pluralism and Media Freedom – Media Pluralism Monitor 2024 report on Hungary, pp. 14–15 and 29.](#)

impose a reduced rate of VAT to certain supplies of goods and services, including periodicals.¹⁷⁷

The **amendment to the VAT Act** provides a discount for all daily newspapers that are published at least four times a week.¹⁷⁸ As the report points out, the legislative amendment was **initiated by the Hungarian Publishers' Association**. According to the explanatory memorandum of the legislation, "**the key objective of the reduced VAT is to promote access for all to diverse information, cultural consumption, mass media and to encourage media pluralism**" and "*the written press is the basis for diverse information, a significant proportion of readers still get important daily information from printed newspapers, so newspapers remain an essential element of democratic public life*".¹⁷⁹ **Media Pluralism Monitor** disregards the purpose of the amendment, which is to improve access to information and media pluralism, **and considers the public policy measure on the basis of the presumed political bias of the media outlets concerned**. Similar legislation can also be found in the UK and Ireland.¹⁸⁰

The **Media Pluralism Monitor report** examining the year 2024 **identifies media literacy as a high-risk indicator**, reporting on the issues it identified in relation to media literacy in public education, while mentioning only initiatives by various private organisations in Hungary in this area.¹⁸¹

The country report disregards programmes launched by the NMHH to promote media literacy as a strategic objective. These include, for example, the Magic Valley (Bűvösvölgy) media literacy education programme, about which the 2022 edition of the Media Pluralism Monitor wrote that the European Regulators Group for Audiovisual Media Services (ERGA) listed it as "*one of the good examples in the EU*".¹⁸²

Another **website** worth mentioning is **Online Heroes** (Online Hősök). Launched in summer 2025, it provides families with advice on different aspects of internet use, such as filtering software or artificial intelligence.¹⁸³ The "**Is My Family Mobile?**" (Mobil a Családom?) initiative, combined with a nationwide information campaign, continued in 2024, aims to provide assistance with finding balance between the online world of mobile devices and family life.¹⁸⁴ Further sources of information include the **onlineplatformok.hu** and **gyerekaneten.hu** sites: the former provides information on

¹⁷⁷ [Council Directive \(EU\) 2022/542 of 5 April 2022 amending Directives 2006/112/EC and \(EU\) 2020/285 as regards rates of value added tax.](#)

¹⁷⁸ Annex 3/B to Act CXXVII of 2007 on Value Added Tax.

¹⁷⁹ [Directory of Explanatory Memoranda. No. 84, p. 970.](#)

¹⁸⁰ [Value Added Tax Act 1994, Schedule 8; Irish Tax and Customs: Tax and Duty Manual – Printing and Printed Material: Printed matter and photography.](#)

¹⁸¹ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, pp. 38–39.](#)

¹⁸² [Bűvösvölgy.hu; European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor Report, Country report on Hungary 2021. p. 26.](#)

¹⁸³ [NMHH: Online Hősök \(Online Heroes\).](#)

¹⁸⁴ [NMHH: Mobil a családom? \(Is my family mobile?\)](#)

how to use online platforms in a safe and conscious way, while the latter specifically assists parents in keeping their children safe online.¹⁸⁵

In addition to the factual errors listed above, the reports under review **contain a high number of subjective findings**. As an example, the Rule of Law Report published by Liberties made a link between the budget of the NMHH and its claims about the independence of the Authority, alleging that "these amounts are theoretically suitable to guarantee high-level professional work; however, **in the case of the Authority and the Media Council these serve as the price of loyalty, which is proved by its inactivity.**"¹⁸⁶

The organisation expresses an unfounded, politically motivated opinion on the NMHH's statutory budget, without providing a factual basis for defining or explaining the conduct it criticises as "inactivity".

Another subjective finding is that, according to the Media Pluralism Monitor, "**The Media Council has facilitated the expansion of the politically preferred players in this market**".¹⁸⁷

With regard to frequency tenders, it should be mentioned that Chapter III of Part Two of **the Media Act** clearly **sets out the rules for tendering for linear media services**. Consequently, the tender notices must clearly **set out "the evaluation criteria and the aspects to be taken into consideration in the evaluation, the categories for evaluating tenders, the quantified evaluation framework allocated to specific evaluation categories, as well as the rules of evaluation serving as the basis of the Media Council's decision on the winning tenderer".**¹⁸⁸ However, the report **does not present any cases where the Media Council acted in an unlawful or biased manner, or any evidence to substantiate such claim**.

Some publications, such as the 2025 report by Reporters Without Borders and the current report by the Safety of Journalists Platform, **compare the Hungarian media landscape to countries of which they themselves have a much less favourable opinion.**¹⁸⁹

Reporters Without Borders mentions Hungary on the same page as Russia, even though the fact file on the latter states that "almost all independent media have been banned, blocked and/or declared "foreign agents" or "undesirable organisations".¹⁹⁰ The Safety of Journalists Platform **also draws parallels with Turkey in addition to Russia**, while

¹⁸⁵ [NMHH: Digipedia](#); [NMHH: Mobil a családom? \(Is my family mobile?\)](#); [NMHH: Onlineplatformok.hu \(Online Platforms\)](#); [NMHH: Gyerekneten.hu \(Kids Online\)](#)

¹⁸⁶ [Liberties: Rule of Law Report 2025, p. 441.](#)

¹⁸⁷ [European University Institute, Centre for Media Pluralism and Media Freedom: Media Pluralism Monitor 2024 report on Hungary, p. 36.](#)

¹⁸⁸ Section 52 of the Media Act.

¹⁸⁹ [Reporters Without Borders: World Press Freedom Index 2025](#); [Safety of Journalists Platform: Annual Report 2025, p. 46.](#)

¹⁹⁰ [Reporters Without Borders: Country fact-file: Russia.](#)

proceedings and even an attempt of assassination against journalists were reported for that country.¹⁹¹

Closing words

As mentioned in the foreword, the NMHH monitors the reports that seek to assess the state of media freedom in Hungary, contributing its insights about content and methodology to the professional discourse on the matter. However, the concerns over methodology and content identified in our present analysis have the potential to weaken the robustness of the publications.

The **transparency** of several reports examined is also greatly **reduced** by the fact that it is not clear exactly who was involved in their compilation. In addition, a high number of reports, such as the Media Pluralism Monitor, the Media Freedom Report and the Rule of Law Report, as well as the Media Capture Monitoring Report, raise questions as to what extent the selection practice for individuals and organisations involved in the preparation of these reports allows for a pluralistic assessment that reflects diverse perspectives.

Although Media Pluralism Monitor attempted to address the risks of a potentially biased assessment by country teams by setting up a group of external experts, it is problematic to what extent members of that group could exert meaningful influence on the final conclusions of the report.

The use of sources in certain documents can be criticised. In the case of certain reports, such as Freedom in the World and World Press Freedom Index, it is not clear exactly what sources were used in their preparation. In the case of the Media Pluralism Monitor, the Mapping Media Freedom – Monitoring Report, the Safety of Journalists Platform, the Media Capture Monitoring Report and the reports published by Liberties, references are made mainly to a one-sided selection of organisations and newspapers that call into question the pluralistic assessment reflecting diverse perspectives. In addition, several reports typically refer to other media freedom reports.

As pointed out, **factual errors** can be identified in this year's reports as well. As an example, the publications by Liberties state that "*Hungarian media regulation does not restrict the ownership of media companies*", despite the fact that the Media Act establishes as a fundamental principle the prevention of the formation of an ownership monopoly and the undue restriction of competition in the market, and sets out specific provisions to allow for action to prevent market concentration. Another example is the current edition of the Media Pluralism Monitor criticising the Online Platform Dispute Resolution Board's independence from the Digital Services Coordinator, misinterpreting the requirements of the relevant EU Regulation.

¹⁹¹ [Safety of Journalists Platform: Annual Report 2025, pp. 15, 29 and 42.](#)

It is also a matter of concern that, in addition to factual errors, the publications also contain **subjective statements of opinion**. A good example is when the Rule of Law Report draws parallels between the NMHH's budget and the shortcomings they identified in relation to the Authority's independence, and then fails to explain and substantiate such claims.

In order to publish more professionally sound and unbiased reports in the future, we propose the consideration of our constructive criticisms.