



## CS1. Studies on national media research capability as a contextual domain of the sources of ROs

The aim of the **first case study** is to describe and analyse the **countries' monitoring capability**: the ability and possibilities of various agents to observe the developments of the media and the changes in society emanating from the media transformations, as well as related risks and opportunities for deliberative communication, and applying the obtained knowledge in making media political decisions.

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# BULGARIA

## **Bulgaria: Risks and opportunities related to media and journalism studies (2000-2020). Case study on the national research and monitoring capabilities**

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### **Executive summary**

The text provides an overview of some of the major sources and datasets on deliberative communication in Bulgaria in four domains: legal and ethical regulation, journalism, media usage patterns, and media related competences. While in some of these domains research is well presented, in others it is not comprehensively developed. Comparatively well advanced is the analysis of media related legislation and regulation domain, although empirical practices are less explored. Reasoning on the media structure developments are more thoroughly approached in view of freedom of expression, freedom of information, and the ethical issues of media accountability. The journalism domain is addressed through market developments, public service media, content production, and working conditions. Media usage patterns are examined with the prevalence of issues regarding pluralism of viewpoints, relevance of news media, and trust in media. The domain of media related competences is of growing scholarly interest, especially in the area of media literacy initiatives and sustenance of professional standards. The exposition and the analysis of the collected sources may supplement tracking the critical junctions between the various elements of deliberative communication and to provide ground for outlining the risks and opportunities challenging the future of the media developments in the country.

## **1. Introduction**

During the first two decades of the 21st century, the Bulgarian media ecosystem has experienced intensive processes of transformation, impacted by the vigorous developments of the information and communication technologies, which were supplemented by new economic models of production and consumption of media content.

That is why, in the considered 20-year period, the media research interest in the country has been focused primarily on the challenges of the political, economic, social and professional aspects of media developments, such as: legislative and regulatory; journalistic; media usage patterns; media related competences, all covered by the Mediadelcom project.

In particular, legal framework, regulatory practices and civil ethical initiatives are comparatively comprehensively studied at national and international level. Despite the academic publications related to the topic, data about the Bulgarian media regulation have been also collected through national reports submitted to CoE, EC, OSCE, UNESCO, ITU, and others. Materials related to compliance with international principles of freedom of expression and access to information as well as with aspects of the acceptable limits of these fundamental rights dominate.

The resulting changes in the nature of the journalistic profession, the role of the media and journalists in the digitalized socio-economic conditions are also comparatively well researched. Regarding the quality of the media content, the following main characteristics have been studied, although sporadically: timeliness of the news programs; public significance of the broadcast information; factual accuracy based on verification by independent sources of information; objectivity – disclosure of all facts in an unbiased way; presentation of plural points of view on the topic; publication of in-depth journalistic works on socially significant topics (investigations, reports, analyzes, comments); etc. Along with the many benefits and positive effects of the new media ecosystem, increasing trends to misinformation, manipulation and hate speech have also been examined.

The media usage by audiences is studied in light of several factors such as: access to media content; media diversity; functionality and quality of the media; public trust in the media; new media, etc. The most common research is related to public trust in the media and frequency of media consumption, broken down by different age groups, as well as divided into social and ethnic principles. The type of media preferences (TV, radio, press, internet, websites, social networks, social media) have been also studied, as well as variety of issues, regarding media consumption and quality of news content. What is absent also is the critical outlook of the media community itself about its behavior and missed opportunities during these years.

Research on media-related competencies is rather sporadic. Specific interest especially on media literacy issues has been growing lately, mainly due to the efforts of non-governmental organizations and academia.

Some of the entities engaged with the provision of documents and expert positions, relevant for all domains, are: The Union of Bulgarian Journalists; The Council for Electronic Media; The Communications Regulation Commission; The Ministry of Transport, Information Technologies and Communications; The Ministry of Culture; The Bulgarian Association of Communication Agencies; The Branch Association of Bulgarian Telecommunication Operators; Universities; The Bulgarian Academy of Sciences; The Bulgarian National Television (BNT); The Bulgarian National Radio (BNR); providers of media services; The Association of European Journalists in Bulgaria; The Konrad Adenauer Foundation (KAS); The Open Society Institute-Sofia; The Reuters Institute; Reporters without Borders; Freedom House; IREX; The National Council for Journalistic Ethics Foundation; The Coalition for Media Literacy; The Access to Information Program NGO, etc.

Significant academic journals dealing with media related issues are predominantly distributed online: (Rhetoric and Communications; Newmedia21; Media and Public Relations; Postmodernism Problems), etc.

The National Statistical Institute provides statistical data about some activities of the press organizations, the audiovisual media providers, and the Information Society.

Due to an overabundance of different sources, this case study is based on a selection of the 235 most complete and relevant ones which have been included in the bibliographical database, available on the Mediadelcom project website (<https://mediadelcom.eu>).

## 2. Publications, data sources and main monitoring actors of legal and ethical regulation domain

The examined sources can be divided into several groups: legislation acts, including the Constitution and relevant laws; international acts; national and international academic books and articles, including forthcoming publications; ECtHR cases and comments; decisions of the Media Ethics Commission; published academic dissertations on the topic with relevance for the scope of the analysis; questionnaires for various international organizations and fora on different issues related to freedom of expression and media; international projects including Bulgarian partners; information and expert opinions in the media (Veleva, 2022). The combination of these sources gives a relatively good picture of the legal and ethical regulation in Bulgaria (Zankova, 2021). They present the results of the research on media law and media regulation of radio and television environment and the main tendencies in self-regulation and media ethics throughout the studied research period (2000-2020). They also cover (since 2010) the legal framework of digitalisation of the electronic media and the main aspects of the new online media. In Bulgaria there is no special law on new media services and media platforms but the opportunities and challenges generated by new media services for media freedom and independence are also examined.

Lex.bg is the Bulgarian legal portal assuring free access to the consolidated versions of all Bulgarian pieces of legislation (in Bulgarian). It also offers news from the legal world at home and abroad (LEX.BG).

Ciela Norma AD has developed 15 information products, maintaining current and archive normative documents from the Bulgarian legislation, administrative procedures, European legislation, translations of the legislative framework in English language, as well as products specializing in different areas - accountancy, taxes, insurance, construction, customs and currency regulations, energy sector, education, etc. Upon an annual subscription, customers receive Internet access to the products of Ciela Norma AD and support for their update for the duration of the subscription (Ciela Norma).

APIS is another developer of legal and business information systems in Bulgaria. The module APIS Law is a part of legal information system APIS and is designed for helping the use and enforcement of the provisions of the Bulgarian legislation. APIS Law contains: the consolidated texts of the legislative instruments in force with all their amendments; an archive of amended and repealed provisions of the legislative instruments; decisions and rulings of the Constitutional Court; judgments and orders in civil and criminal cases of the Supreme Court of Republic of Bulgaria; case law of the Supreme Court of Cassation and the Supreme Administrative Court; judgments and orders of the Arbitration Court at the Bulgarian Chamber of Commerce and Industry; case law of the European Court of Human Rights, etc. The system operates by subscription (APIS).

Through both information systems articles and comments of specialised publications in the field of finance and law can also be accessed. These two main Bulgarian legal data systems are structured in a manner suitable for the needs of the judiciary and legal profession (number of case, names of plaintiffs and defendants but not according to the subject matter of the case). These peculiarities makes it difficult and time consuming to use these systems for other purposes.

The decisions of the Constitutional Court of Bulgaria are accessible at the website of the Court and publications and comments – in the Constitutional Court journal. A specific feature of the Bulgarian Constitutional Court is that it does not entertain individual petitions from citizens but gives obligatory interpretations of the Constitution and rules on a request for establishing the unconstitutionality of the laws and other acts of the National Assembly, as well as of acts of the

President together with other competences (art.12 para 1) (Constitutional Court of Bulgaria, Constitutional Court journal).

Respective laws and regulations are available at the websites of the relevant ministries and regulatory bodies, such as the Council for Electronic Media (CEM), the Commission for Regulation of Communications (CRC), and the Ministry of Culture in the regulation of media domain. In the media field relevant laws, regulations and translated acts of the Council of Europe are published at the website of the Ministry of Transport, IT and Communications. The acts of the audio-visual media regulator - the Council for Electronic Media such as decisions, standpoints, declarations, public consultations, etc. can be reached regularly at its website. The Ethical Code of Bulgarian Media, the regulations of the Ethical Commission, opinions and decisions are available at the website of the Foundation "National Council for Journalistic Ethics" (Foundation "National Council for Journalistic Ethics").

One of the frequently cited European projects is the MEDIADDEM research project on media policies and regulation in 12 European Union (EU) member states and 2 candidate countries (1 April 2010-31 March 2013), funded by the EU's Seventh Framework Programme (MEDIADDEM). The purpose of MEDIADDEM has been to examine state media policies in the selected set of countries (Belgium, Bulgaria Croatia, Denmark, Estonia, Finland, Germany, Greece, Italy, Romania, Slovakia, Spain, Turkey and the UK) and to explore their effects for media freedom and independence.

Other important sources that have been checked are the reports and consultations of international organizations - OSCE on freedom of expression, EPRA on media diversity, pluralism and gender equality, ERGA - on notions of disinformation, UNESCO on Internet universality indicators, the Council of Europe on the protection of journalism and safety of journalists and other media actors, the Council of Europe on filtering, blocking and taking down of content, the European Audiovisual Observatory - on the regulation of cinematographic works, the amendments of the AVMSD and commercial communications in member-states, etc. It is to the decision of the international organizations which of these questionnaires will be published. The data, however, reveals how separate issues have been treated in Bulgaria but not the general trends.

In the studied corpus of relevant media legislation, academic research, and specialized sociological surveys most of the sources are not based on consistent empirical and statistical data in order to identify thoroughly the risks and opportunities for deliberative communication. The problems covered comprise mainly freedom of expression, pluralism and diversity of media, freedom and security of journalists, libel and defamation, access to information, confidentiality of journalistic sources, hate speech, the status of radio and television organizations, etc. International principles and case law dominate over domestic practice. The analysis of the legal framework prevails over publications on media ethics. Individual right to free speech and its aspects are more thoroughly explored than institutional right - freedom of the media (Tabakova, 2006, Drumeva, 2013, Tanchev, 2002, Veleva, 2020, Nikolova, 2010).

## 2.1. Freedom of expression

Freedom of expression is protected by the Bulgarian Constitution (1991), articles 39, 40 and 41. The right to privacy is protected by the Constitution art. 32. According to the Constitutional Court decision 6/ 1997 alongside the right to privacy, secrecy of correspondence and inviolability of home the right to private life represents a complex of interests which form the protected personal sphere of every man. The Law for the protection of personal data and the Radio and Television Act assure legal protection of the right to privacy including personal data protection. According to the practice of the high administrative court the right to personal life of public figures is not protected to the same level as the right of ordinary people (Nikolova, 2004). Copy-

right is also regulated through the Copyright and Related Rights Act. Copyright issues are also thoroughly discussed in legal literature including their practical aspects (Sarakinov, 2013).

The Republic of Bulgaria has become a member of the Council of Europe in 1992 and the ECtHR and the ECJ case law has contributed to the improvement of the legislation and court decisions including in the field of freedom of expression and media, however more efforts on the part of national decision-making bodies are necessary to turn improvements into consistent tendencies. Very few media organizations have introduced mechanisms supporting the level of actor transparency, including bylines, profiles of journalists, media blogs, or published mission statements. It is difficult to find initiatives directly related to Mediawatch activities in Bulgaria.

The audiovisual sector (radio and television) is regulated through the Radio and Television Act (1998) and the Electronic Communications Act (2007). No special regulation vis-à-vis press and online media is in force and to these types of media the general legal acts are applied. The Radio and Television Act (RTA) refers to strengthening self- and co-regulation in the new provisions transposing the amendments of the Audiovisual Media Services Directive (AVMS, 2018). Currently there is no established practice under these provisions.

As there is no special regulation of the Internet in Bulgaria and accordingly, there is not enough up-to-date and consolidated data about the quality of services, which is essential for the elaboration of a sound information society policy and regulation (Council of Europe).

The Council for Electronic Media (CEM) being an independent specialized body monitors broadcasting media services and video-sharing platforms. CEM maintains several registries to enhance transparency in the sector: Cable and Satellite Bulgarian Linear Services; Cable and Satellite Foreign Linear Services; Terrestrial Broadcasting Nonlinear Services on Demand Enterprises; Distribution Programs; Video Sharing Platforms (Council for Electronic Media).

Recently, SLAPP cases have seriously threatened freedom of speech at home and abroad. Such cases are on the rise and affect the media environment while in some circumstances lead to self-censorship. Reporters without Borders (RSF) condemns the judicial harassment of two Bulgarian investigative journalists at the beginning of 2022 and calls on the newly elected Bulgarian government to pass legislation that protects the media against gag suits (Reporters without Borders, SLAPP, 2022). There are no official statistics on these cases in Bulgaria, but according to unofficial data from the non-governmental sector, their number exceeds 300. Adequate legislative moves and decisions are still to be elaborated.

## 2.2. Freedom of information

The Non-Governmental Organization Access to Information Program provides assistance to citizens, media and journalists with respect to access to public information (Access to Information). With the adoption of the Law on Access to Public Information (2000) a special procedure for providing freedom of information by public institutions was created and a legal basis for going to court in cases of refusal of access or other forms of infringement of the citizens' right to know. Annotations of relevant cases are regularly published on the program website.

Valuable practices against discrimination and hate speech in the media based on self-regulatory mechanisms have been developed by special commission (Commission for the Protection against Discrimination). Another commission is a supervisory body responsible for the protection of the fundamental rights and freedoms in connection with the processing and facilitating of the free movement of personal data in the European Union (Commission for Personal Data Protection). Copyright and neighbouring rights matters as well as the transparency of media ownership registry of print and online media organizations are managed by the government (Ministry of Culture).

Whistle blowers are not regulated as such and research on their activities is missing.

## 2.3. Accountability system

Regarding accountability system, the Code of Ethics of the Bulgarian Media is not bound by sanctions (Union of Bulgarian Journalists, 2004). There is no Press Council in Bulgaria. A commission on media ethics at the Union of BG Journalists operates alongside the general Commission on Journalistic Ethics at the Council for Journalistic Ethics. Journalists should act in good faith and provide accurate and reliable information in compliance with journalistic ethics following the principles of the ECtHR and the case law of the ECtHR. The difficulties of self-regulation are related to the existence of a very strong media community with authority that can turn professional standards into everyday practice. It is hard to talk about such a community in Bulgaria. However, the adoption of an ethical code is a positive element of the media environment, as it provides guidelines for identifying responsible media.

The professional organizations of those working in the media field, such as the Union of Bulgarian Journalists and ABBRO protect the labour and professional interests of their members and represent the link between the media system and civil society. Their activity is related to the improvement of the media standards and the modernization of the journalistic profession, which in Bulgaria is not regulated by a special law.

Bulgaria has not yet introduced an ombudsman relevant to the overall media sector. However, both public service broadcasters – the Bulgarian National Radio (BNR) and the Bulgarian National television (BNT) have appointed institutional ombudsmen with the aim to pursue active dialogue and profound feedback from the public. These offices also provide valuable feedback on self-regulation (Bulgarian National Radio).

In order to provide relevant and up-to-date information the government collaborates with a number of stakeholders regarding media and information society services in Bulgaria (Ministry of Transport, Information Technology and Communications (MTITC).

Governmental offices of Bulgaria regularly review the information submitted on the online “Platform to promote the protection of journalism and safety of journalists” of the Council of Europe (Ministry of Foreign Affairs).

In this domain the sources reveal mainly the engagement of academic institutions, NGOs, some ministries and regulatory bodies. There are not special national configurations or multi-stakeholders’ synergies specifically set up for the purpose of research. Research projects gravitate around universities and non-governmental organizations.

### 3. Publications, data sources and main monitoring actors of journalism domain

The main source of information about the current changes and the state of the art of the journalistic profession are studies and publications of the academic and professional community in Bulgaria (books, academic articles, dissertations)<sup>2</sup>. Among the most comprehensive studies are those published by researchers from the Faculty of Journalism and Mass Communication of the Sofia University (The St. Kliment Ohridski Sofia University). The authors mainly discuss the concepts and status of media professionals in Bulgaria, define the positions and functions that have arisen with the introduction of new technologies, analyze the processes in media production and distribution, and typologize the contemporary media. Valuable analyses on media economics and of the tendencies in media market and professional developments are conducted by researchers from the University of National and World Economy in Sofia. Researchers from New Bulgarian University of Sofia are also productive on various media issues. Media research has also been conducted by Universities with social sciences and humanities profiles and from institutes with similar profiles of the Bulgarian Academy of Sciences.

Additional sources of information on the state of the art and developments of media and journalism are professional associations and organizations (the Union of Bulgarian Journalists, the Association of the European Journalists-Bulgaria, the Investigative Journalists Association, the National Council for Journalistic Ethics Foundation), as well as the media industry organizations (the Association of Bulgarian Radio and Television Operators - ABBRO, the Union of Publishers in Bulgaria, the Audit Bureau for Circulation in Bulgaria, the Union of Journalists and Distributors of Printed Publications, the Bulgarian Web Association, the Branch Association of Bulgarian Telecommunication Operators).

The latest, an original and in-depth study on the subject, has been published in August 2021 (Angova et al, 2021). Through documentary and content analysis of advertisements in global sites of job offerings, the authors prove that in contemporary communication professions the differentiation between the different positions is eliminated, the professional expertise converges and competencies overflow - both within each of the professional groups and between the three groups (of journalists, PR experts and advertising specialists).

#### 3.1. Market conditions

At the end of the second decade of the 21st century, in Bulgaria is witnessed an unprecedented merger of telecommunications, media and online industries. However, general rules in the competition law do not include specific provisions for the media market in particular. At the same time the actual level of concentration is impossible to track due to a deficit of precise data, which is considered as a risk itself. These concerns are regularly present in the annual reports of the European Commission for Bulgaria, Freedom House, Reporters without Borders, etc.)

<sup>2</sup> Publications of Todor Abazov, Eliezer Alfandari, Angel Angelov, Lilyana Andreeva, Vesislava Antonova, Iskra Baeva, Ventsislav Bondikov, Radomir Cholakov, Maria Deenichina, Greta Dermendzhieva, Mincho Draganov, Efrem Efremov, Andreana Evtimova, Petranka Fileva, Rosen Ginev, Galya Hristozova, Polyana Ivanova, Hristo Kaftandjiev, Penka Karaivanova, Svetlozar Kirilov, Kiril Konov, Lulivera Krasteva, Georgi Lozanov, Manuela Manliherova, Rusi Marinov, Ivanka Mavrodieva, Mihail Meltev, Lora Metanova, Vladimir Mihailov, Nadezhda Miteva, Totka Monova, Raina Nikolova, Nelly Ognyanova, Filip Panayotov, Margarita Pesheva, Todor Petev, Milko Petrov, Teodora Petrova, Dobrinka Peycheva, Maria Popova, Lilia Raycheva, Ognyan Saparev, Marko Semov, Vladimir Simeonov, Orlin Spasov, Velin Stanev, Tolya Stoitseva, Lyubomir Stoykov, Vesela Tabakova, Petko Todorov, Mariyan Tomov, Veselina Valkanova, Simeon Vassilev, Neli Velinova, Emil Vladkov, Bissera Zankova, Ognyan Zlatev, Minka Zlateva, Ivaylo Znepolski, and others.

In the last few years, the issue of market conditions and media ownership and the interests they stand for has become increasingly acute for Bulgarian society. The efforts of state institutions, however, do not produce the expected results. Of particular importance is the information provided by professional associations (media, journalists, distributors, etc.), as it can be considered primary. In response to the public interest, property registers have been established at the broadcasting regulator for owners of electronic media (Council for electronic media) and at the responsible ministry of Culture for owners of printed publications (Ministry of Culture, Register). However, the real owners and their interests, especially of the mainstream influential media in Bulgaria, often remain hidden behind formally registered companies and individuals. Revealing the real owners to the public is usually the merit of the country's investigative journalists. (The investigations of journalists from the website *bivol.bg*, which shed light on the connection of the Bulgarian M.P. Delyan Peevsky with the ownership of print media and TV7 in the period 2013-2018, are only one of the multiple examples.)

Thus, the information in the maintained registers may seem abundant, but does not give an idea of the real state of ownership in the Bulgarian media and in a sense is useless. Information on the income and financial condition of the media in Bulgaria also has a certain deficit. As commercial companies, they enjoy the right to keep their financial health secret. However, most of the leading commercial media in Bulgaria are part of large international corporations, some of them are listed on the world stock market. Chances are to find data about media financial status in the annual reports of the corporations published by the stock exchanges. The Interactive Advertising Bureau since 2016 annually has been examining revenues from digital advertising in the media (Interactive Advertising Bureau).

Another source is TV & Digital Report - research by Publicis Groupe together with GARB and Nielsen Admosphere on media consumption, public preferences for different information channels, intensity of viewership, etc. in the period 2020-2021 (Publicis Groupe). The studies are on a monthly basis and each of them is focused on a separate media, program or news program. For several years in a row since 2008, research by the Nielsen Company has been available on the Internet, providing in-depth measurement and analysis of the Internet audience, advertising, video, and media with user-generated content (Nielsen Online, 2008, 2009, 2011). Among the best kept secrets in Bulgaria are the ratings, advertising tariffs and the revenues from sponsorship and advertising of the media. In terms of ratings, only the weekly report of one company is available free of charge (Nielsen Admosphere, 2022).

### 3.2. Public service media

The annual reports of the public service broadcasting media BNT and BNR are also publicly available. The shortage of these data creates obstacles for researchers of media, journalism and communications in Bulgaria.

Bulgarian National Radio and Bulgarian National Television are financed mainly through state subsidies and limited by legislation revenues from advertising, sponsorship and co-productions (Radio and Television Act, 1999). Directors-General of the two public service electronic media are elected for a term of 3 years by the members of a regulatory body (Council for Electronic Media/CEM). Directors-General report their work to the aforementioned regulatory body twice a year. The Bulgarian National Radio is among the most preferred news media in the country (BNR Report, 2021-2022), while the ratings of the Bulgarian National Television are traditionally far from those of the leading television stations NOVA and bTV (Nielsen Admosphere, 2022).

A consequence of the lack of institutionalized, comprehensive and up-to-date information is the scarce number of studies devoted to the state of the journalistic profession in Bulgaria. Since the beginning of the 21<sup>st</sup> century, there are only a few studies on this topic. The most extensive and academic among them dates back to 2010 (Fileva et al, 2010).

### 3.3. Production conditions

Production conditions, such as multiplatform journalism, digital resources, investigative resources, foreign correspondents are comparatively well researched (Vasilev, 2020). During the first decade of the 21st century the discrepancy between the expectations of employers and society towards journalists and the real competencies of media professionals acquired during their higher education and professional training has already been clearly noticeable and alarming (Spasov, 2006). Lecturers and researchers in academic institutions are beginning to consider the need for practical training of students and acting journalists to work in an online environment, and especially – in online versions of traditional media, in social media, in social networks, and in converged communication platforms (Konstantinova, 2011; Valchanov, 2012). Methodologies, new courses and master's programs are being developed, specifically aimed at the qualification of future staff in the new media (Konstantinova, 2012). Supplementary training programs for journalists also include NGOs with external funding, e.g. Center for Media Development, Open Society Foundation, Reuters Institute for the Study of Journalism, etc. The contribution of researchers to the study of the transformation of media and journalism in Bulgaria is serious (Raycheva, 2013; Pavlova, 2012).

### 3.4. Working conditions

#### *3.4.1. Intra-organizational diversity (human resources and gender, age, class, education, cultural balance /autonomy among journalists)*

Serious research on the state of the journalistic profession in Bulgaria (Slavcheva-Petkova, 2017; Spasov et al, 2017; Vulkov, 2020) contain detailed information on the education and training, the demographic profile of journalists in Bulgaria (predominantly age, gender, and education), working conditions, degree of autonomy and freedom of expression, journalistic roles and professional ethics. The scope of the sample of these studies, however, is limited and non-representative. There are no reliable and accurate data on the total number of employees in the Bulgarian media.

The above-mentioned research allows to draw several conclusions with a high degree of reliability: 1. women predominate among journalists in Bulgaria, the average age of journalists is between 30 and 45 years; 2. a large part of the journalists (over 60%) have a diploma for higher education, but the number of journalism graduates decreases; 3. the journalistic profession is not well positioned on the labour market (in terms of working conditions, social benefits and payment); 4. journalists in Bulgaria feel themselves working in the conditions of increasing pressure from various external players (business, political, institutional), growing self-censorship, physical assault and prosecution against them. The last two statements are two good reasons for the declining prestige of the profession.

The three major TV channels in Bulgaria as well as BNR maintain programs for investigative journalism and foreign correspondents abroad.

#### *3.4.2. Journalistic competencies, education and training*

At least ten universities in Bulgaria offer journalism higher education (BA, MA, and PhD programmes) - six of them are public, namely: The St. Kliment Ochridski Sofia University, The St. Cyril & Methodius Veliko Turnovo University, The St. Neophyte Rilsky Blagoevgrad University, The St. Paisiy Hilendarski Plovdiv University, The Konstantin Preslavsky University of Shumen, The University of National and World economy (with focus on business journalism, and four are private: New Bulgarian University, Varna Free University, Burgas Free University, American University in Bulgaria, Blagoevgrad. There is also program in Journalism, offered by the National sports academy, with focus on sports events coverage.

In the last five years, the number of students enrolled in Journalism and Mass Communication has been gradually decreasing. In the academic year 2017 2555 students enrolled to study this major (BA-2209, MA-346), while in 2021 their number decreased to 2226 (BA-1933, MA-293) (National Statistical Institute, Enrolled students, 2021).

## 4. Publications, data sources and main monitoring actors of media usage patterns domain

Media consumption is depending on factors such as access to media content, media diversity, functionality and quality of mass media, public trust in media, etc., which vary over the years. In turn, access to media content largely depends on the level of technological support of the Bulgarian audiences, on the characteristics of these audiences, their expectations, etc.

Studies of media consumption models and media-related competencies in Bulgaria (2000-2020) are not present in their full comprehensiveness. The main sources are publications of the academic and professional community. In general, research on media consumption over the years have been conducted mainly by the Media Program for Southeast Europe of the Konrad Adenauer Foundation, Trend Sociological Agency, Open Society Institute, UNICEF for Bulgaria, Media Democracy Foundation, Kantar, CMO Insider.bg, Edelman Trust Barometer, Market Links Agency, Reporters Without Borders, Freedom House, etc., as well as by independent researchers (Lyubenova, 2016, Spasov et al, 2016, Koleva, 2018, Daulova, 2021)

The top ten of the most visited Internet sites in Bulgaria traditionally include the search engine Google, YouTube, Facebook, e-mail abv.bg, Wikipedia, some trade sites and sales announcements. Nielsen Online. (2008). It is only after them that the sites of information, commentary or entertainment media, television, radio, etc. begin. The ranking of the media in the Bulgarian Internet is based on the data of the global counter alexa.com, owned by the company "Amazon". In addition to visits to the sites in the global network and by individual countries, the counter also registers data, such as the average time spent by a reader, the number of pages read and many more indicators, number of searches, keywords, etc. (E-vestnik team, 2021).

### 4.1. Research and monitoring that reflects access to the media and diversity of viewpoints in media system

With regard to reflecting access to media and diversity of viewpoints researchers note that with the advent of Internet more and more often unreliable information is published, unverified by independent sources, and without additional points of view, without pluralism.

As the second decade of the new century progresses, the topic of pluralism and the lack of transparency in the ownership of the Bulgarian media stands out with particular sharpness and in recent years have dominated the content not only of scientific publications but also of various European Commission reports on Bulgaria, as well as of the annual reports of IREX (2001-2019), and by the annual ranking for media freedom of Reporters without Borders (IREX, Reporters without Borders). The most active in the long run are the Media Democracy Foundation with its annual reports on the state of media pluralism in Bulgaria from 2011 to 2021 (Media Democracy Foundation), the Media Program "Southeast Europe" of the Konrad Adenauer Foundation (Konrad Adenauer Foundation), Reuters Institute Digital News Reports - Bulgaria is included in the annual reports of the Institute from 2018 on (Reuters Institute).

## 4.2. Relevance of news media

Regarding relevance of news media it can be said that the changes that occurred in the technologically advanced media ecosystem are not only positive. The risk factors affecting the quality of journalism are increasing at the expense of higher speed. Fake news cause confusion in the audiences and grow mistrust in media content. The percentage of negative news prevails compared to positive ones. Less and less investigative materials, analyses, serious reports find their way to broader publics. Casual language, very often dotted with jargon replaces the literary Bulgarian speech. Reality and low-budget comedy shows as well as betting on emotions music formats are challenging the news media and this leads to a decline in freedom of speech, largely due to the concentration of media ownership closely linked to certain politicians and businesses. Attitudes and expectations of the audiences towards media are rapidly transforming. Recipients are becoming more impatient, fast readers, and more fickle. Long texts with serious titles turn out to be undesirable or impossible for the modern reader to perceive. Audiences increasingly prefer easily digestible video information.

Despite the greater public trust in TV as an information channel, albeit with some skepticism, other studies over the years indicate that a large proportions of recipients are learning the news first from social networks, and that they more often make their choices emotionally than rationally. Audiences are becoming increasingly passive and inert, making no effort to get quality information (Lyubenova, 2016). The Facebook already makes the choice for the audience on its own - with sponsored posts, with news shared by friends, with quotes and likes. The users and the journalists nowadays often perceive the events at the same time.

## 4.3. Trust in media

The most common research is related to public trust in the media and frequency of media consumption broken down by different age groups, as well as divided into social and ethnic principles. The types of media preferences (TV, radio, press, internet, websites, social networks, social media) have been also investigated, as well as variety of issues, regarding media consumption and quality of news content.

A study by the Konrad Adenauer Foundation together with the sociological agency Alpha Research shows that trust in the media remains weak and only 10 percent of Bulgarians believe in the independence of the media in the country. Television leads the rankings. 60 percent of Bulgarians trust TV news. Online news portals, social networks, print media and radio follow with a big difference. Among the social networks and social media most popular is the Facebook network, followed by YouTube, Viber and Instagram. The majority of respondents think that fake information is disseminated mainly through the print media (37 percent) and social networks (35 percent). The study shows that from 2019 to 2020, due to the COVID pandemic there is an increase in TV viewership of the entire population by 9%. The largest increase is in viewers with an average age of 35-44 years (17%), followed equally by two other age groups - from 15 to 24 years and from 25 to 34 years (14%). The time spent for watching TV of the adult population over 60 years of age has increased by 9% and of the children aged 4 to 14 - by 8% (Konrad Adenauer Foundation, 2018).

Research conducted in 2020 by the Media Program for Southeast Europe of the Konrad Adenauer Foundation and the sociological agency Trend reflects the change in the trust in media as a consequence of the anti-epidemiological measures against COVID-19. When asked how the events in 2020 changed their trust in journalistic work in Bulgaria, only 8% answered that they have higher level of trust in the media. The percentage of people whose trust in media has dropped is much higher - their share is 29%. When asked which media they trust the most, the largest percentage of respondents (54%) point out large commercial TV stations. 38% trust

public television BNT, 31% - social networks, 31% - Internet news portals, 17% - public radio BNR, 14% - commercial radio stations, and 10% - magazines and newspapers. Some of the questions covered by the study are related to how well the public feels informed about the current political situation in the country. To this question 4% answer they do not feel informed at all, 20% say they are rather uninformed, 51% - rather informed, and only 14% respond that they are well informed. 8 % can't judge (Konrad Adenauer Foundation, 2020).

Data from the regular AB Brand Tracking survey, which monitors consumer behavior and brand recognition, show that due to the corona virus pandemic, the media are enjoying increased interest. By the beginning of 2021, 57% of Bulgarians between the ages of 18 and 65 watch TV several times a day. Only 4% state that they do not watch TV. These results are not a surprise, given that this is the media that attracts the largest share of advertising investment. In recent years however, the consumption of audio content on the market has increased. According to the survey, nearly 55% of respondents listen to podcasts. In comparison, fewer people report reading newspapers and magazines (Penkova, 2021).

In general, the older generations (over 50 years of age) are still informed mainly by traditional electronic media - television and radio, while young users search and compare different sources of information - traditional and digital. New generations are also more critical of the presentation of news by the media and the coverage of issues important to society (Kirilova, 2019). It can be said with great confidence that 2020 digitized the elderly in Bulgaria due to COVID (redlink.bg, 2021).

A study conducted by Nieslen Atmosphere Bulgaria and LLS Bulgaria, published in January 2018, notes that the elderly population between 66 and 75 years old, the so-called "heavy users", watches the most television and reads newspapers and magazines compared to all other age categories. Only in radio listening does it competes with the 46- to 55-year-old listener group. According to the same study, "media multitasking" is to some extent characteristic of children and young people - they do not watch one program in a certain time period, but consume TV content flexibly, combining it with using the phone, laptop or tablet. Watching TV is often considered more of a 'background', secondary activity, undermining TV's position as an effective media channel for children and youth audiences (Nieslen Admosphere, 2021).

Compared to other age groups, the younger generation watches less TV and uses online media more. In terms of trust, TV leads the ranking. 60 percent of Bulgarians trust TV news. Online news portals, social networks, print media and radio follow by a wide margin. The spread of false information continues to play an important role. The majority of respondents think that it is distributed mainly through print media (37 percent) and social networks (35 percent). This research is from 2018 and can be used to track trends (Konrad Adenauer Foundation, 2018).

## 5. Publications, data sources and main monitoring actors of media related competences domain

Researchers' interest in media-related competencies has been growing since 2016, when most studies in this field date, mainly by NGOs, scientific institutes, and independent scientists. The highlights of most research are related to trust in the media and fake news. Among the most active NGOs are the Coalition for Media Literacy, the Open Society Institute, the Association of European Journalists in Bulgaria, the Reuters Institute, which publishes the Digital News Report for more than 46 countries each year, UNICEF-Bulgaria, and the Konrad Adenauer Foundation. Lately, research and initiatives related to media education for children and young people have increased. Studies and initiatives addressing media literacy are also on the rise. Most of the research can be found on the Internet with free access or free registration.

## 5.1. Normative sources

National policy on media literacy is still underdeveloped in normative terms. The first legal document related to media literacy is the Preschool and School Education Act (2015), but the law does not contain an official definition of media literacy, and media education is not explicitly linked to the allocation of resources. Media literacy is only implicit in this new law. Media literacy was introduced in the curriculum of formal education in Bulgaria in 2018 with the amendment of Ordinance №13 of 21.09.2016 on civic, health, environmental and intercultural education. However, for the development of media literacy and competence only ten school hours are provided for the twelve-year course of secondary education in Bulgaria. At the end of 2020, the requirements of the Audiovisual Media Services Directive were transposed into Bulgarian legislation for the introduction of measures to promote and develop media literacy of citizens of all ages and for all media (Article 32, para. 24 and Article 33a of the Radio and Television Act amends SG No. 109/2020, in force since 22 December 2020). Although civil society organizations, such as the Media Literacy Coalition, actively organize and conduct media literacy training, including for teachers and the elderly, such initiatives cannot offset the need from systematic education.

## 5.2. Assessment of media related competences among citizens

A detailed analysis regarding the radio and television audiences in Bulgaria for the period 2001-2010 can be found in three books published within the project "Electronic Media Environment in the Republic of Bulgaria in the Conditions of Transition and Digitalization: 1999-2012", financed by the National Scientific Research Fund of the Ministry of Education and Science - "Radio and Television Environment 2001-2010" (Pesheva, 2011), "Radio Environment 2001-2010" (Pesheva et al, 2011), and „Television Environment 2001-2010" (Pesheva et al, 2011). These systematic studies are unique of their kind in Bulgaria and cover a 10-year period of time, which contributes to tracking the developmental trends. They also include the demographics of the audiences.

Data from the surveys related to media literacy and media competencies are mostly from the period 2016-2021 and they address mainly the topics of media pluralism, media consumption and media freedom. Research, publications and studies that address the domain of media competences usually take a complex approach - both qualitative and quantitative analysis. Researchers use variable methodologies. Some apply content analysis, others - sociological surveys, which are among the most commonly used tools. A national representative survey of the Bulgarian Center for Safe Internet from 2016 analyzes the digital media competence of Bulgarian children between 9 and 17 years of age on the basis of their behavior in Internet. Bulgarian children use the Internet often and in a more mobile way, which helps them develop their technical abilities, according to the Digital and Society Index (DESI). Most of them have digital identities and claim to be able to protect themselves from inappropriate content. A large percentage of children even claim to use programming languages. Among the identified shortcomings are: low motivation to meet educational needs through the Internet; insufficient skills to assess online information; and insufficient skills to ensure online safety among children (Center for Safe Internet, 2016).

A lot of research and initiatives in Bulgaria related to addressing media literacy are available on the Internet. The main emphasis is on the importance of media literacy in the modern world and the need to work to improve the skills and competencies of media content users. Most studies are not done systematically, but register the processes for a certain period of time, although there exist studies and analyzes in recent years, which are carried out annually. For example, the Reuters Institute survey has been conducted every year since 2012 among more than 30 countries, and since 2018 it has included Bulgaria. The analyses feature statistics on population

and internet consumption, top media brands, data on the ownership of the largest media as well as on media consumption and trust in the media, the use of social media and more.

It is noteworthy that much of the research finds low levels of trust in the media and concerns of fake news, but the focus is on the outcomes, not on the causes and preconditions that lead to declining public trust in the media. The fact that according to the Reuters Institute reports more than half of the people in Bulgaria rely on the social networks to receive news confirms the need for a more in-depth study of the level of media competencies and related skills of the Bulgarian audiences. In the 2021 report respondents say that they have, on average, experienced more false and misleading information about the coronavirus (54 percent) than about politics (43 percent). Other topics with false information are related to celebrities such as actors, musicians and sports stars (29 percent), products and services (22 percent) and climate change (20 percent) (Reuters Institute 2021). The research has been commissioned by the Reuters Institute for the Study of Journalism to understand how news is being consumed in a range of countries and conducted by YouGov and their partners (YouGov).

It remains unclear though by what criteria people determine that a piece of news is fake. This would be an adequate guideline for their media competences. One of the recent studies of the Coalition for Media Literacy “Media, Parents and Children Development” (2021), examines: parents' and children's perceptions of media and digital media literacy; trust in different types of media; frequency of media content usage; and time spent on the Internet (Coalition, 2021). Information about these issues is also provided by the annual Media Literacy Index, which has been compiled by the European Policy Initiative (EuPI) of the Open Society Institute - Sofia since 2017. Data are available on the Institute's website and are highly reliable. According to the latest edition of the 2021 index, Bulgaria ranks 30<sup>th</sup> in the ranking of 35 countries (Lesenski, 2021). However, this is currently one of the few studies that specifically registers the level of media literacy in the country, which is measured by certain indicators, while comparing Bulgaria with other countries.

## 6. Analysis of research and monitoring capabilities and quality

In the considered 20-year period, the media research interest in the country is focused primarily on the challenges of the processes of digitalization and the introduction of new technologies in various aspects of the media field: legislative and regulatory; journalistic; media usage patterns; media related competences, extensively analyzed in a number of academic research publications.

Following the aim to emphasize on the state-of-the-art of the existing research in the country with regard to risks and opportunities for deliberative communication, a large array of specialized publications has been identified and examined. This includes predominantly findings of transnational organizations that monitor media systems globally; datasets of national statistics and public bodies; legislative, policy and regulatory documents; institutional official papers and non-government reports; academic national and international research; major sociological surveys; research of non-governmental organizations; publications of professional associations media, etc., using keywords related to the four domains. Large comparative research projects that collect periodically data and produce comparative analysis over certain periods are relatively scarce and inconsistent, as well as thorough commentaries of the media industry. As a result of the research, media literacy initiatives that aim to improve digital literacy among both children and older users are increasing.

The assessment of the major Bulgarian datasets and publications with regard to their quality and capabilities of monitoring the risks and opportunities for deliberative communication in the

country is developed in five dimensions: availability of data, recency and continuity of data, complexity of data-gathering, trust and reliability, and availability of experts and/or specific research structures.

## 6.1. Comparative analytical overview on available research and access to the research

Data is important for evaluating the effectiveness of the national policies across the studied four domains while simultaneously supplying with comparative insights at regional and global levels.

### 6.1.1. Legal and ethical regulation domain

In the studied corpus of relevant academic research and specialized sociological surveys on media legislation and regulatory practices most of the sources are not based on consistent empirical and statistical data in order to identify thoroughly the risks and opportunities for deliberative communication. Besides, the sources regarding the analysis of the legal framework prevail over the publications on media ethics. The problems covered by the sources studied mainly comprise freedom of expression, pluralism and diversity of media, freedom and security of journalists, libel and defamation, access to information, confidentiality of journalistic sources, hate speech, the status of radio and television organizations, etc. Here treating international principles and case law dominate over the analysis of domestic practice.

The audiovisual sector (radio and television) is thoroughly regulated through the Radio and Television Act (1998). The Bulgarian press has no detailed legal basis that explicitly addresses the obligations and responsibilities, as well as the terms under which the freedom of the press could legitimately be regulated. The same is valid for online media. There is no special law either about press regulation or online media regulation. To these two types of media the general legal acts are applied.

The professional organizations of those working in the media field represent the link between the media system and civil society. Their activity is related to the development of self-regulation, co-regulation, improvement of media standards, and modernization of the journalistic profession, which in Bulgaria is not regulated by a special law.

The Radio and Television Act (RTA) refers to self-regulation and co-regulation in the new provisions introduced with a view to transposing the amendments of the Audiovisual Media Services Directive (AVMS). Art. 4b of the RTA stipulates the obligation to promote self-regulation and co-regulation through codes of conduct and standards, where appropriate. Also listed are some of the existing codes such as the Code of Ethics of the Bulgarian Media, developed by the National Council for Journalistic Ethics Foundation; the Unified Standard for the Regulation of Sound Levels in Advertising, adopted by the industry, and the National Ethical Rules for Advertising and Commercial Communication, developed by the Association “National Council for Self-Regulation”. However, the law also emphasizes that professional organizations can adopt other rules and standards.

Peculiar is that the regulatory framework which is in force in Bulgaria in most of the cases does not take into account the specific features of the Internet. Publications point out that self-regulation should be strengthened through more consistency and transparency. It is a dynamic environment that requires efforts for modernization of the existing legislation bringing it in harmony with the specific nature of the ICT. A clear cut system of offences/crimes on the Internet, penalties and authorized bodies to take measures has to be in force. These bodies should work in greater cooperation with each other and exchange regularly data. Summarized data has to be available for the needs of research and policy activities.

Publications and debates on legal issues have not had a great impact on the improvement of media policy and regulation. Self- and co-regulation remain underdeveloped due to the passivity of media professional organizations and civil society (Zankova, 2021).

### 6.1.2. Journalism domain

In the last twenty years the academic and professional community in Bulgaria has created a large corpus of studies on media and journalism developments. The sources can be divided into several groups: academic research; research of professional and branch organizations; research of non-governmental organizations; and information from regulatory bodies and state institutions. The sources from the first three groups are predominant.

The annual reports of non-governmental organizations and foundations dedicated to the media environment in Bulgaria during the last decade have been characterized by topicality and continuity. This is because they prefer to use local professionals to collect the necessary data and commission/conduct their own research. However, the information they contain is often unrepresentative (for example, in the annual reports for Bulgaria of the Reuters Institute for the Study of Journalism it is explicitly mentioned that the recorded data are not representative of the country).

Topicality is most inherent in the data published by primary sources - these are the reports of professional and branch organizations, whose participants voluntarily provide information about their own activities (eg the Association of Bulgarian Radio and Television Operators, the Union of Publishers in Bulgaria, the Branch Association of Bulgarian Telecommunication Operators, etc.). However, this information is rather sporadic and lacks continuity.

The same can be said for sociological research on media issues. They are nationally representative and are usually held on the eve of elections. The most common subject of research is the preferences of voters for different sources of information and trust in the media. Conducting of such a survey is expensive, and the results are provided to the sponsor (most often a political party or NGO), at whose will, a selected part of the results is presented to the general public.

Since 2015, the National Statistical Institute publishes annual data on the state of the media, which can be considered reliable and trustworthy. They are of a general nature and are limited to several indicators - annual production of radio and television programs, annual circulation of newspapers and magazines, internet access of households, etc.

There is no detailed and up-to-date information about the realization of the graduates of journalism students in Bulgaria. The Faculty of Journalism and Mass Communication at the St. Kliment Ohridski Sofia University, which produces the largest number of graduates in mass communication in Bulgaria, does not publish information about the career developments of its graduates, as some other universities in the country do. The Ministry of Education and Science maintains an annual ranking of the country's universities in various fields, including the field of Public Communications and Information Sciences (Ministry of Education and Science). The methodology for calculating the ratings is based on 100 indicators, one of which is the realization of graduates on the labour market. The authors of the ranking report that they collect the necessary information through the National Statistical Institute (NSI) and through sociological surveys. A review of the NSI yearbooks shows that they lack information about the realization of graduates in Bulgaria (National Statistical Institute, 2020).

Publications, surveys and discussions on journalism issues have impacted to some extent the awareness of the media guild on sustaining professional standards.

### 6.1.3. Media usage patterns domain

In the studied period of 2000-2020 rhythmic research on media usage patterns in Bulgaria is comparatively extensive, although with not regular cyclicity.

Most of the research examines issues related to access to media content, media diversity, functionality and quality of the media, public trust in the media, new media, frequency of media consumption by different age and social groups. Research from 2000 to 2008 on the topic is less extensive than that research from 2009 to 2020. A richer database of research on media consumption from the beginning of the century is found in the period of 2020-2021.

Back in the years there are a number of studies in which there is certain cyclicity on an annual basis (Media Program for Southeast Europe of the Konrad Adenauer Foundation, Trend Sociological Agency, Open Society Institute, UNICEF for Bulgaria, Media Democracy Foundation, Kantar, CMO Insider.bg, Edelman Trust Barometer, Market Links Agency, Reporters without Borders, Freedom House, etc., as well as by independent academic researchers). Most of these studies (or reprints of them, or journalistic materials based on information from them) are freely available in the public space. However, a paid subscription for access is required to use some of the data.

Surveys conducted by sociological agencies are available online and published by media. Often they are commissioned and financed by media and therefore only part of them is published and complete data are difficult to find. Academic research mostly is accessible.

Data from reports of the Open Society Foundation for 2011 show the dynamics of the media usage, comparing the popularity of cable TV, satellite TV and IPTV (Open Society Institute, 2011). Although Bulgarians enjoy one of the fastest internet connections in the world, broadband access is generally unpopular. In Bulgaria as a whole, e-government and customized audio content services are not well developed. On the other hand, there is a widespread distribution of torrent trackers.

An Open Society Foundation study in 2009 found that among today's generation of 18-30 year olds, internal stratification among young people is a source of potential conflicts (Dichev et al, 2009). Perhaps the most significant factor that has led to many developments is that the center of gravity among young people has gradually shifted from the professional sphere to leisure. Consumption is often a more important identifier than career or status. The line between work and leisure has become problematic. In the same way, the public has been displaced by the private; communities – by networks. Against this background, a deep generational conflict has been going on for the last ten years (Ibid).

Young people see as their advantage adaptability, mobility, as well as shortcoming of biographies, knowledge or solid values. This makes them an ally of neoliberalism, while the old ones cling to the state, security, solidarity. Among the youth elites, however, social protest, discontent, and collective action are a stigma of the unsuccessful, the marginalized, those who cannot cope with their problems on their own, according to data from the analysis.

There is a high level of digital inclusion and connectivity among children and young people - nine out of ten respondents possess a personal smart phone to access the Internet. However, it is worrying to find out that many children and young people do not have their own device suitable for the optimal satisfaction of their educational needs and goals (such as a laptop, tablet or desktop computer). The risks and vulnerabilities in connectivity are disproportionately higher among children and young people from vulnerable groups, for whom access to the Internet can be the difference between social exclusion and equal opportunities. Providing access to digital devices and connectivity that meet all digital needs, including education, is still an unfinished endeavor in Bulgaria, according to this study.

Research on media consumption by older people is fragmentary. In most cases, the research is not specifically targeted at them, but rather is part of comprehensive audience surveys. People over the age of 55 watch TV more often than any other demographic groups: six-seven hours per day. The average age of social network users has been steadily increasing in recent years, according to a report by the Open Society Foundation (Antonova et al, 2013).

#### 6.1.4. Media related competences domain

As for media related competences there is a tendency to growing of research and initiatives in Bulgaria related to addressing media literacy. After 2016, there has been an increase in interest in media competences, while before that research was rather isolated. Afterwards there are examples of systematic analyzes and studies being performed every year, for example, the Media Literacy Index, which the Open Society Institute has been conducting since 2017 using indicators of media freedom, education and trust between people.

This trend is also shown by the research of the Media Literacy Coalition's research on distance learning and media literacy skills among students and teachers in 2020, followed by a parent's survey in 2021 on „Media, Parents and Children Development“ and the first for Bulgaria National study to assess the digital-media competences of high school students in 2022.

A number of studies are consumption-oriented and are related to the so-called. people's media diet - what sources of information they use, how much of them watch TV, listen to radio, read newspapers and magazines. Many systematic studies focus on trust in the media.

A less researched area is the degree of media literacy among audiences, how people assess the authenticity of information and by what criteria, whether they have critical thinking about it and understand the context, how they distinguish between misinformation and fake news, etc. Issues related to pluralism, media consumption and media freedom are viewed as dimensions of media competences.

Insufficiently analyzed is also the question to what extent people's trust in the media is determined by their competences and whether there are other factors than the rational ones that make people lose trust in the media.

It is noteworthy that the attention of researchers is less often attracted by the characteristics of the media audience and by the deficit of comprehensive and systematic research for media users to cover demographic, educational, social characteristics, as well as their preferences. These characteristics directly affect media literacy and the obligation of the Council for electronic media is to outline a strategy on Media Literacy perspectives in the country.

## 6.2. Monitoring capabilities and quality of data and knowledge

Bulgarian monitoring capability has increased since the beginning of the 21<sup>st</sup> century, though with different pace across the four studied domains. Insufficient proper and stable state funding hinders the advance of large-scale regular research on important aspects of the media ecosystem and the communication environment. Focused research is financially supported by EU funding or private entrepreneurs, which can't lead to systematic and substantial conclusions about the trends of media and communication developments for long periods of time.

Regarding the legal and regulatory domain most of the sources carry trustworthy and reliable information, especially those of official institutions. The ECtHR cases and judgments provide also valuable data to consider by national courts in their media related practices. The ECtHR and the ECJ case law has contributed to the improvement of the legislation and court decisions including that in the field of freedom of expression and media, however more efforts on the part of decision-making bodies are necessary to turn improvements into consistent tendencies.

The sources reveal mainly the engagement of academic institutions, NGOs and some ministries. The sources do not reveal special national configurations or multi-stakeholders' synergies specifically set up for the purpose of research.

Scientific articles and monographs covering various aspects of freedom of speech and the level of legal research are of good quality. The individual right to free speech and its aspects are more thoroughly explored than the institutional right – freedom of the media.

The main difficulty in collecting data on the state of the art of the media and journalism in Bulgaria is related to the lack of comprehensive, systematized and regularly provided information from primary sources - the media organizations themselves and journalists. Most academic organizations have the expert capacity to collect the necessary information themselves, but they often lack the financial resources to conduct such research.

The information provided by the professional associations of media and journalists, the National Statistical Institute, as well as the sociological surveys of nationally representative nature deserve the trust of the researchers in Bulgaria. The lowest level of trust is connected with the sample data for the audiences, the rating and the market shares of the media. There is a tendency for people metric companies to provide distorted data by "inflating" the data about their customers at the expense of the media that are in the portfolio of a competing company. This tendency is clearly evident in the drastic discrepancies between the results of the same media in the bulletins of the two main people metric agencies in Bulgaria. In addition to confusing audiences and researchers, the distortion of information makes it very difficult for advertisers to choose the right medium and thus distorts the advertising market.

## 7. Conclusion

The case study of the The Bulgarian media system and the related risks and opportunities covers their developments and specific issues throughout a twenty years period of time.

Media and media related legislation complying with the international human rights standards is introduced and updated. Flaws and deficits in this respect relate to the quality of legislation as such, its systematic ordering, interpretation and implementation to create consistent practices. Synchronizing national with European legislation is a screen for lobbying amendments against the public interest is the conclusion of the authors of the report "10 years of Bulgaria in the EU" about the achievements of the Bulgarian media law and system (Center for liberal strategies, 2017). An illustration is the digitalization of terrestrial broadcasting, launched in 2009, with the synchronization of respective Bulgarian legislation with the European one, as the country's commitment was announced in 2012. Not only this commitment was not met, but criminal proceedings were instituted against the country, culminating in the imposition of sanctions. In order to serve "convenient" local participants, ad hoc changes were introduced. The amendments in the legislation related to digitalisation (the Electronic Communications Act and the Radio and Television Act) were lobbyist and the auctions for multiplexes (digital broadcasting platforms) were organized in such a manner as to favour some bidders at the expense of others (Zankova, 2021). This is an example how media legislation has been adopted against the public interest. The latest amendments in the Radio and Television Act comprise due to the transposition of AVMSD a new portion of changes together with others numerous ones done after the year of its adoption from 1998 until now are hard to implement systematically. Also, the latest incorporation of the provisions of the AVMSD additionally overburdens the legal text with complicated details that are mechanistically included.

While some topics are more or less comprehensively tackled in media related sources - mostly issues pertaining to the relationships between the media and politics, others as the economic factors or the impact of culture are less available. There are topics such as concerning the role of

the ombudsman in the media sector or whistleblowers and the media that should be clarified and profoundly dealt with in the future. Missing are also legal analyses beyond legal positivism or interdisciplinary ones. New media, platforms and services are not studied vigorously especially from a legal and ethical perspective though they occupy a substantial position within the media and attract most of the public's attention and particularly of the young audience.

Media ethics have not become an unalienable element of everyday media activities and have not been internalized as professional values by most of the media. A sociological survey from 2014 proved that compliance with basic ethical norms in journalism had become one of the taboo topics for Bulgarian online media (Institute for Modern Politics, 2014). Due to the fact that media ethics have been neglected during the years of transition and subordinated to political and corporate interests, the media in Bulgaria have been trapped by politicization and commercialization (Zankova, 2014).

Following from all these media accountability is most often one-sidedly studied from a journalistic point of view without taking stock of its regulatory aspects including procedural ones and the opportunities for trying and exploring novel accountability practices online. Media accountability cannot be understood outside the social and political structures or media ownership as well as regulatory framework defined at the national level (including self- and co-regulation). Lack of clear and stable ethical regulations can result in a complex relationship between the media and politicians and in the emergence of media groups with unclear origins and financial opacity.

During the first two decades of the 21st century, research on the media ecosystem in Bulgaria can be divided into two areas: research on the transformation of the journalistic profession and journalistic competencies, and research focusing on journalistic values and ethics in the digital, convergent society. The first type dominates the interest of researchers until 2013, with the mass digitalization of the media (the widespread penetration of the Internet and social networks, and the digitalization of radio and television broadcasting).

The surveys and analyzes of media consumption from 2000 to 2020 are not regular and they do not relate specifically to the choice of media by audiences and the reasons for this choice. Most of the research indirectly examines issues concerning the choice of media, such as public trust in the media, access to information, frequency of media consumption, divided by age, social criteria, etc. Research from 2000 to 2008 on the topic is less extensive than from 2009 to 2020. Most serious research has been done in the last 5-6 years. The attitudes and expectations of the audiences towards the transformed media have also being transformed. Surveys show that nowadays a small part of the population does not have the necessary equipment to access new sources of information.

As a result of all the changes that have taken place in the media space, there has been a decline in public trust in the media. The low trust is due both to their economic and political commitment to the powerful of the day, and to the compromises they make in their attempts to adapt to the economically and technologically changing media environment. Nevertheless, television remains the media with the greatest trust and the highest percentage of consumption by the audiences.

Research related to media competences clearly demonstrates the growing importance of media literacy, of critical thinking, of understanding the right context, and of teaching these skills in school so that users can be adequate and prepared for guidance in the huge flow of media and information in the modern world. The analysis outlines the need for more periodic and systematic studies of the level of media competences of the audiences in the context of characteristics such as education and social status and, accordingly, of criteria for assessing the quality of information. This could provide clarity on where to emphasize media literacy training.

## 7.1. Risks and opportunities to assessing media developments

The review of the existing publications on media topics in the period 2001-2021 allows to highlight the following *potential risks* for the media developments and research units in Bulgaria:

- ◆ lack or insufficient availability of comprehensive, reliable and publicly available information on the media developments and the journalistic profession, which should be offered rhythmically;
- ◆ lack of sufficient funding (or lack of interest in available funds) among the academic and professional community to collect data and conduct their own periodic and cyclical surveys;
- ◆ lack of a link between the academic educational institutions and the media business to help students achieve a balance between academic knowledge and practical skills. The research studies have been performed mainly by NGOs and independent researchers, and the involvement of the media themselves has been quite limited;
- ◆ unreliability of publicly available information about the audiences, the market shares of influential news media, which undermines the trust of society and business in the Bulgarian media as a whole;
- ◆ media market research is mainly commissioned by the media, which fund this type of research. Only parts of complete data are available, and these are the ones that certain media companies have decided to be public.
- ◆ passiveness of state institutions and regulatory bodies in conducting independent research on current phenomena in the media environment and the media market;
- ◆ complication of the whole picture and not finding out the relationships and interdependencies among related issues.

*Potential opportunities* to overcome the negative impact of the listed risks in data collection and publication of information might be outlined as follows:

- ◆ to urge state institutions, legislative and regulatory bodies to create a healthy media environment that deserves trust and serves society;
- ◆ to improve the methodology of collecting data by the national authorized bodies. One of the most important effects could be the changes in the collection of national statistical data about various media and their use;
- ◆ to encourage academic institutions and professional organizations in applying for financial support from the National Research Fund of the Ministry of Education and Science and from European programs for funding and conducting independent expert research on contemporary phenomena and developments in the media environment;
- ◆ to use modern information technologies and tools to facilitate the conduct and increase the value of research (including - online marketing research and public opinion polls, software for data processing, chatbots, etc.). To introduce a holistic approach towards the study of media consumption in the digital society;
- ◆ to establish a partnership between academic institutions and companies in the field of media, communications and advertising. Such a partnership would have the potential to positively impact both parties - by enriching academic activity and “grounding” it on the media reality, as well as by developing and introducing innovative approaches and practices in the media business.
- ◆ to orientate research towards the subject or the user which corresponds to the idea of building a human-centric information society;
- ◆ to stress the importance of the problems of media and their transformation and impact among the panoply of IT issues;

- ◆ to create systematic and rich datasets in the European countries in this field;
- ◆ to boost comparative research and cooperation through a network of scholars and researchers. There are many studies on media literacy in Bulgaria, but they are mainly conducted by non-governmental organizations or independent researchers;
- ◆ to collect data about: the news habits in the country and correct the statistics used so far; the PSB news spread in the digital environment across media and platforms from the perspective of the user; the news non-users and to study the reasons for that media abstention phenomenon;
- ◆ to collect data about alternative media;
- ◆ to transform data into stable knowledge on the media environment.

The assessment of these potential risks and opportunities may serve as a reliable basis for outlining the major critical junctions of the media transformation processes in four domains (legal and ethical regulation, journalism, media usage patterns, and media related competences).

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