

Rule of Law 2025

Secretariat General for Communication and Media

Rule of Law Mechanism - Answers to targeted questions (Country-visits 17-20 March 2025)

2. The written input mentions that during the year 2024, the Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals focused on gender-based challenges in the media, the safety of journalists in conflict situations and collecting suggestions directly from media professionals to government officials, taking into account European standards for the protection of journalists. Can you provide us more details on this, as well as on the follow-up to this consultation?

A. Gender-based challenges in the media

The Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals, established in July 2022, has renewed its annual mandate for the third consecutive year (Government Gazette B' 5716/2024), reaffirming Greece's commitment to providing continuous and stable support for journalists and media professionals, and underscoring the country's dedication to safeguarding press freedom and democratic values. Importantly, the creation of the Task Force has never been it was never a pretentious and fragmented action in response to the recommendation. It has been a deliberate and substantial initiative aimed at establishing a long-term, structured mechanism for action, dialogue, and impact in the field of media freedom and journalist safety. Unlike many advisory bodies, the Task Force's primary focus is on designing, promoting, and implementing concrete, measurable initiatives. This is clearly demonstrated by the wide range of actions that have been conceived, shaped, or refined directly through the collaborative discussions within the Task Force, which has proven to be a dynamic innovation stakeholders' hub for driving real progress and innovation in the protection of journalists.

For this year's term, the representative of the Ministry of Social Cohesion and Family Policy is the Secretary General for Gender Equality and Human Rights herself, Ms. Aikaterini Patsogianni, who attends the monthly meetings of the Task Force. Her direct participation underscores the Task Force's special focus on addressing gender-based challenges within the media sector. The appointment of such a high-level official not only sends a strong political message about the government's prioritization of gender equality, but

also enhances the Task Force's overall effectiveness. By bringing expert insight and institutional authority to the table, this move strengthens the integration of gender-sensitive approaches in the protection and empowerment of media professionals.

According to article 24 of Law 4604/2019, all mass media (print and electronic) must promote substantive gender equality and the projection of an equal image free from gender stereotypes. Following the publication of the abovementioned legislation, the Secretariat commissioned the publication of the "Good Practice Guide for Journalists and Media Professionals", which was prepared by the National Kapodistrian University of Athens in 2020. This guide was also presented and thoroughly discussed in the Task Force during 2023, and **it has been already agreed jointly by the Secretary General for Communication and Media and the Secretary General for Gender Equality and Human Rights that the guide will be updated in the near future. This update aims to reflect current realities, address emerging challenges, and ensure the guide remains a future-proof, practical tool for fostering inclusive and stereotype-free media representation.**

On 23rd May 2024, journalists' unions in Greece and the government signed a Collective Labour Agreement for journalists employed by the State and public media¹. The agreement includes new gender equality provisions and enhanced protection for women journalists against harassment. According to the new agreement, Greek newsrooms in public media with more than 50 journalists must form a committee comprising media management and journalists' associations. Meanwhile, media outlets with fewer journalists can appoint 'Integrity Advisors'. Their job is to ensure the implementation of the gender equality provisions, respond quickly to any incidents of harassment and violence that occur in the newsroom, and mediate the prevalence of working relationships that are free from sexist and abusive behaviour.

In addition, they should monitor and intervene - in an advisory capacity - to guarantee that all genders are equally represented among guest speakers and that language used in broadcasting programmes and journalistic content is free from abusive and sexist stereotypes. In cases of harassment, the commission should also assist complainants by liaising with competent public bodies and experts in the field of mental health.

Lastly, women journalists, who are insured under the Unified Press Organization Of Auxiliary Care Insurance (EDOEP) are now also entitled to special leave for maternity protection, in accordance with amendments to the Law 5078/2023 (article 150) that took place in 2024. Specifically, the Organization's insured women are entitled to receive special maternity

¹ <https://www.poesy.gr/anakoinosi-dod-ellada-nea-syllogiki-s/>

protection leave of nine (9) months, provided that they have received the maternity benefit from EDOEAP².

B. Safety of journalists in conflict situations

i. **Joint Training of Police Officers and Journalists under the auspices of UNESCO**^{3 4 5}: This training was held at the Hellenic Police Training and Education School in Veria, from 18 to 21 June 2024, with the participation of journalists and media professionals, co-organized by the International Centre for Training on the Safety of Journalists (ICSJ) and UNESCO. The training aimed to enhance the knowledge of police officers on the area of respecting and protecting press freedom, by preventing attacks against journalists by violent groups. A total of 29 police officers and 14 journalists participated in the training. The training received positive feedback from local authorities and institutions, strengthening cooperation and mutual respect.

ii. **Fourth School for the Safety of Journalists**⁶: From 16 to 20 September 2024, the annual School for the Safety of Journalists was held, covering the protection of journalists in war zones and crisis areas. This five-day program is designed to provide journalists with both theoretical and practical knowledge to respond to war zones or hazardous environments (Hazardous Environment Awareness Training - HEAT). It includes topics such as field safety, first aid, survival in hostile environments, digital security and information management, with the aim of strengthening international protection of press freedom and providing journalists with tools to safely cover conflicts. The school, launched in 2019 by the Peace Journalism Laboratory (PJL), has attracted increasing interest due to current geopolitical developments

iii. **First International Conference on the Safety of Journalists**^{7 8}: On 21-22 September 2024, the first international conference on the safety of journalists was organized in Thessaloniki, with the

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<https://www.edoeap.gr/2024/01/%CE%B5%CF%80%CE%AD%CE%BA%CF%84%CE%B1%CF%83%CE%B7-%CF%84%CE%B7%CF%82-%CE%B5%CE%B9%CE%B4%CE%B9%CE%BA%CE%AE%CF%82-%CE%AC%CE%B4%CE%B5%CE%B9%CE%B1%CF%82-%CF%80%CF%81%CE%BF%CF%83%CF%84%CE%B1%CF%83%CE%AF/>

³ <https://www.amna.gr/mobile/article/829009/Me-epituchia-oloklirothike-i-ekpaideusi-astunomikon-kai-dimosiografon-ICSJ-se-sunergasia-me-tin-UNESCO-P-Marinakis-Exairetikiki-protoboulia->

⁴ <https://www.ertnews.gr/video/veroia-drasis-gia-tin-ekpaideysi-dimosiografon-kai-aksiomatikon-tis-el-as/>

⁵ <https://www.astynomia.gr/2024/06/22/22-06-2024-ekpaidefsi-schetika-me-tin-eleftheria-tis-ekfrasis-kai-tin-asfaleia-ton-dimosiografon-stis-egkatastaseis-tis-scholis-metekpaidefsis-kai-epimorfosis-ellinikis-astynomias-voreias-elladas-st/>

⁶ <https://mpsoct.army.gr/anakoinoseis/scholeio-asfaleias-dimosiografon-16-20-sep-2024/>

⁷ <https://www.ertnews.gr/video/i-asfaleia-ton-dimosiografon-itan-to-thema-synedriou-sto-tellogleio-idryma-texnon/>

⁸ <https://icsj.net/index.php/el/conference-2025/conference-2024-gr>

participation of 100 delegates from a wide range of countries, where European standards for the protection of journalists were presented. The conference was also attended by the President of the Parliamentary Assembly of the Council of Europe, who welcomed this initiative in his address^{9 10}. The aim is to establish this conference as an international forum for discussing issues of journalist safety and press freedom, while highlighting Greece at the global level.

For the year 2025, the International Center is scheduled to organise the fifth School for the Safety of Journalists, and the second International Conference on the Safety of Journalists which will take place between 14-15 June under the title *“From risk to resilience: a multidisciplinary approach to global journalist safety”*¹¹.

iv. National Focal Points to the OSCE RFoM Project on the Safety of Journalists

On the occasion of the annual National Focal Points meeting for the Project on the Safety of Journalists (SoJ) that took place between 12-13 March 2025 in Thessaloniki, Greece, the Representative on the Freedom of the Media, Ambassador Jan Braathu had the opportunity to meet the Secretary General for Communication and Media, Dr. Dimitrios Galamatis who described the various initiatives of Greece in this area¹².

v. Greece’s Role in Advancing Journalist Safety and Media Freedom at the Multilateral Level

It is noted that, at the multilateral level, Greece has been actively engaged on this issue across interconnected human rights fora—not only within the EU and the Council of Europe, but also within the United Nations. In cooperation with a core group of co-sponsoring countries (Argentina, Austria, France, Costa Rica, and Tunisia), Greece biennially submits—as penholder—to the Third Committee of the United Nations General Assembly the Resolution on the "Safety of Journalists and the Issue of Impunity," which is adopted by consensus.

Additionally, Greece participates as a member of the core group (Austria as penholder, along with Brazil, France, Greece, Qatar, Morocco, and Tunisia) that biennially submits to the Human Rights Council the Austrian-initiated Resolution on the Safety of Journalists.

Greece is also an active participant in the Groups of Friends on the Safety of Journalists, which operate within the frameworks of the UN General Assembly (New York), the Human Rights Council (Geneva), UNESCO (Paris),

⁹ <https://www.amna.gr/macedonia/videos/850090/l-asfaleia-ton-dimosiografon-sto-epikentro-diethnous-sunedriou>

¹⁰ <https://pil.jour.auth.gr/index.php/el/nea-gr/diethnes-synedrio-gia-tin-asfaleia-ton-dimosiografon-mia-protovoulia-me-pagkosmia-diastasi>

¹¹ <https://icsj.net/index.php/el/conference-2025>

¹² <https://www.amna.gr/en/article/890769/Jan-Braathu-Greeces-initiatives-in-the-field-of-information-are-very-important---The-establishment-of-the-ICSJ-is-a-huge-achievement>

and the OSCE (Vienna). These groups aim to promote and protect the safety of media professionals at the international level.

Moreover, the Greek authorities have committed to taking into account the guidelines and recommendations of the Council of Europe, particularly Recommendation CM/Rec(2016)4 of the Committee of Ministers on the protection of journalism and the safety of journalists, as well as the Resolution on the Safety of Journalists adopted at the Ministerial Conference on Media and Information Society held by the Council of Europe in Nicosia in June 2021.

Greece is also a founding member of the Council of Europe's Group of Friends on the Safety of Journalists and Media Freedom, established in 2016, along with twelve other member states.

Finally, at the bilateral and international level, Greece actively seeks participation in relevant thematic alliances and initiatives. It is a member of the Media Freedom Coalition, a group of approximately 50 like-minded countries that promote press freedom and the safety of journalists worldwide through diplomatic channels. Furthermore, Greece is a member of the Media Freedom Cohort, a group of like-minded states and civil society actors established within the framework of the Summit for Democracy initiative launched by the Biden Administration.

C. Collection of suggestions from media professionals to government officials

- Changes in legislation, such as article 15 of L. 5085/2024 regarding measures against violence in sporting events, or the abolishment of article 362 of the Greek Criminal Code regarding simple defamation are indeed, requests and suggestions that have been put on the table by the representatives of media professionals' unions during the Task Force meetings.

- During the last meeting of 2024, it was decided that discussions on SLAPPs will be formally integrated as a permanent and structured part of the Task Force's agenda, ensuring continuous and systematic dialogue on this critical issue.

- This, has also led to the decision to include one representative from the Secretariat General for Communication and Media, as well as two journalists-members of the Task Force to the legislative committee, established by the Ministry of Justice, regarding the process of the transposition of the EU Anti-SLAPP Directive.

- The National Plan for the Management of Public Open-Air Assemblies is in full force since 2021 and foresees the appointment of a liaison Officer who acts as a channel of communication with media professionals throughout the assembly.

The National Plan was presented in detail by a Police Officer-representative of the Ministry of Citizen Protection during a special meeting of the Task Force,

where representatives of all media professionals' associations (including Journalists, Photojournalists and Technicians) had the opportunity to exchange views, offer comments, and better understand the way the Police operates during public assemblies. During the meeting, it was proposed to conduct trainings for Police Officers, have already begun in 2024 through the ICSJ, with custom-made training in this area, in collaboration with UNESCO. This way, we can see how this presentation became the starting point for consequent trainings.

COMMENTS

Over the past years, Greece has taken bold and effective steps to safeguard the freedom and safety of journalists that directly contribute to fulfilling the core recommendation of the Rule of Law Report. Our initiatives are not isolated or superficial. They are the culmination of years of structured reforms, sustained effort, and a strong political will to create a safe, pluralistic, and professional media environment.

The scope of our initiatives is both comprehensive and effective. From the continued operation of the Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals to the establishment of the International Centre for the Safety of Journalists, we have led with actions—not rhetoric.

Yet last year's assessment of "some progress" on non-legislative initiatives doesn't accurately depict the efforts made by Greece, or capture the full picture of the strides we have made and the tangible impact on the ground.

Among other organisations, the OSCE acknowledged Greece's efforts in creating a significant initiative focused on media freedom and the safety of journalists¹³, noting that the Task Force and the ICSJ have already received positive feedback from journalists. These developments reflect a meaningful step forward in media freedom at the European level.

However, there are some sources that neglect the progress that has been made. Last year's Media Pluralism Monitor Report, for example, included legal reform recommendations that Greece had already implemented by the time of publication—suggesting that its risk ratings were based on outdated or incomplete data. For example, the MPM Report calls Greece to promote the decriminalization of defamation, even though that legislative change had already taken place with the abolishment of article 362 of the Greek Criminal Code. It also calls for the introduction of training seminars to enhance journalist safety, overlooking the existence of the International Training Centre for the Safety of Journalists and Media Professional and its numerous

¹³ <https://www.amna.gr/en/article/890769/Jan-Braathu-Greeces-initiatives-in-the-field-of-information-are-very-important---The-establishment-of-the-ICSJ-is-a-huge-achievement>

training seminars and events.¹⁴ Moreover, we were never consulted in the process of the drafting of the Report. Had we been asked for input, the MPM could have avoided instances where implemented initiatives were still being listed as pending recommendations.

Greece has led by example. We have not only met expectations—we have exceeded them. We actively support and implement the European Media Freedom Act, and have already introduced reforms in line with its framework. Last year's Commission study on the monitoring of the implementation of the Recommendation for the Safety of Journalists also confirms our progress¹⁵.

5. With regard to the distribution of public funds allocated for state advertising to a wide plurality of media service providers in accordance with national law, can you shed some light into how the implementation of this takes place? Are there any plans to put in place an annual report providing a comprehensive overview of the state funding and its allocation?

It is noted that Article 9 of Law 2328/1995 (A' 159), and also Presidential Decree 261/97 (Government Gazette 186 A'), define the terms and procedure for the assignment of state advertising for the wider public sector that implement media plans.

More specifically, Articles 6 and 7 of the Presidential Decree define the procedure for assigning the state advertising and the selection of the specific media service provider to which the state advertising is assigned, taking into account:

- a) the cost of the service,
- b) the impact of the media outlet to the general public, as inferred from the audience share or listenership ratings that the station has accumulated over the last two months prior to the transmission of the advertisement, and
- c) the impact of the media service provider to specific audience categories in cases where the promotion concerns specialized activities.

For the assessment of the impact of a print media service provider, the average monthly circulation of the publication is taken into account.

Additionally, according to Article 22 of Law No. 5005/2022 (A' 236), the placement of public advertisements and any other advertisement is carried out, under penalty of invalidity of the contract or order, only in print or electronic media registered in the Print Media Registry (M.E.T.) or the Electronic Media Registry (M.H.T.), maintained by the General Secretariat for Communication and Media.

The registration in these registries requires businesses to meet specific objective criteria to enhance transparency in state advertising.

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https://cadmus.eui.eu/bitstream/handle/1814/77003/Greece_EN_mpm_2024_cmpf.pdf?sequence=1&isAllowed=y

¹⁵ <https://op.europa.eu/en/publication-detail/-/publication/bca5a5bd-090a-11ef-a251-01aa75ed71a1/language-en>

The media plans, are submitted before the execution for approval to the General Secretariat for Communication and Media on an annual basis and must mandatorily include the allocation of each entity's projected expenditure among regional media (print, radio, television). The participation of regional media in each category of media must be at least 30%. While they are published in the Transparency Initiative Program DIAVGEIA when the media plans are completed.

Following the above and to ensure the allocation of the total annual expenditure for state advertising across a wide range of providers, the SG for Communication and Media carries out a review of the financial statements, specifically checking compliance with the required quota (30% of advertising expenditure) in favor of regional media outlets. More specifically, if the service determines that the minimum required participation rate (30%) in favor of regional media was not met, the entity is required to allocate the shortfall amount to the category of regional media for which the quota was not met, during the implementation of a new advertising program in the year following the completion of the previous one.

In case of non-compliance with the above provision, the entity shall be subject to an administrative fine equal to the unallocated advertising expenditure needed to meet the aforementioned participation quota.

This is a mixture of obligations and regulations that enchain plurality and diversity in the allocation of state advertising.

Subsequently, each public authority is required to submit: a) statements indicating the amounts spent in the previous year for all types of advertising service contracts (Tax Identification Number of the media service provider, amount, service) and contracts for transmission or publication through the information system "e-Pasitheia" of the General Secretariat for Communication and Media. These statements are gradually public through the above mentioned system. Moreover a report including whether each media program's objectives were achieved and whether the applicable legislation was followed (Presidential Act 50/2015 (A' 179)). However legislative measures are elaborated under the provisions of article 25 of EMFA.

6. Are there any legislative changes envisaged when it comes to providing financial support for news media in Greece, namely local media?

With regard to supporting and strengthening pluralism in Greek media, the Secretariat General for Communication and Media, with the enactment and implementation of Law 5005/2022, took a major reform step in the media sector, correlating the certifications of publications and websites in the MET and MHT Registries with state advertising and state aid, as based on articles 22 and 23 of Law 5005/2022, only to publications and websites

certified in the MET and MHT, respectively, may receive state advertising and state aid.

In the year 2024, with the Joint Ministerial Decision No. E/2018/2024 (B' 2729) of the Deputy Minister of National Economy & Finance and the Deputy Minister to the Prime Minister on the subject of the "*Funding program for the financial support of newspaper publishing companies with national circulation and regional and local newspapers, content providers with regional reach of terrestrial digital television, private radio stations, periodicals and electronic press companies*", as well as with the Decision No. E/4800/2024 (B' 6197) Joint Ministerial Decision of the Deputy Minister of National Economy & Finance and the Deputy Minister to the Prime Minister on the subject of "*Completion of a Financing Program for the financial support of newspaper publishing companies with national circulation and regional and local newspapers, content providers with regional reach of terrestrial digital television, private radio stations, periodicals and electronic press companies*" regional press companies, whose media have been certified by the MET, were supported. It's worth mentioning that as regards JMD E/2018/2024, the Commission approved the initial aid scheme under the Temporary Crisis and Transition Framework for State aid measures to support the economy following the aggression against Ukraine by Russia (SA 112835/2024/N). Additionally, as regards the JMD E/4800/2024 the financial support was provided under the provisions of Regulation (EU) 2023/2831 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid.

7. The written input mentions that the drafting of a law establishing the necessary conditions and rules for the licensing of regional television broadcasting stations has already been assigned to experts, as is the case of stations of national coverage. Can you provide us with a state of play of the drafting and an overview of which conditions/rules will be envisaged?

The Greek authorities have already appointed legal advisers for the purposes of establishing a draft law for the licensing of regional television broadcasting stations. In this regard, there have been significant steps forward, given that consultations with the relevant stakeholders have already taken place, in order to express their views and to present their suggestions, on the upcoming licensing process. The NCRTV, the independent authority responsible for radio and television stations in Greece, has already actively participated in the drafting process and is in agreement with its main points. Additionally, it is important to mention that a technical update that will complement and strengthen the licensing process is already on-going.

It must be highlighted that the NCRTV will be exclusively responsible for the granting of licenses, through a transparent and independent process. The NCRTV will manage the entire contest step by step, and will grant licenses to those stakeholders who meet the necessary criteria.

8. As of December 2024, there have been no legislative changes in Greece specifically enhancing the transparency of media ownership beyond the measures implemented in 2022 and 2023. The existing frameworks including the Registry for Print Media (MET) and the Registry of Electronic Media (MHT) continue to operate as established, aiming to improve transparency in media ownership. The Commission is aware that administrative burden around the verification of these ownership databases is significant.

Are any new initiatives foreseen in this context, namely to address those difficulties?

With more than two years of operation of the electronic MET and MHT Registries, as well as with the institutional establishment of the conditions for certifying printed media and websites in the MET and MHT Registries, respectively, the safety and security of journalists has been strengthened, the protection of the journalistic profession has been enhanced and, most importantly, transparency in the media ownership has been strengthened, as the printed or electronic press company is obliged, as a condition of its certification in the electronic MET and MHT Registers, respectively, to indicate in a visible place on the printed media/website its identity, which includes the company name, the registered office of the company, the names of the shareholder or partner who directly or indirectly holds half of the shares or corporate shares, the publisher, the legal representative, the director and the editor-in-chief, as well as the administrator and the beneficiary of the domain name (for electronic press businesses). It is worth noting that in this way, transparency in the ownership status of the media was established and strengthened as a necessary condition for the certification of print and electronic press businesses in the MET and MHT registries, respectively, which constitutes one of the most important institutional achievements of Law 5005/2022. Under the light of the above, it's important to underline that all the necessary measures have been already taken by the Greek authorities for the enhancement of transparency of media ownership.

It is important to underline that the operation of the MET and MHT Registries for over two years has led to the certification of 390 print media and 550 websites in the completion of the process of the first renewal of the certification print media in the MET and the completion, in March 2025, of the process of the first renewal of the certification of websites in the MHT. These numbers constitute, on the one hand, indicators of acceptance of the Registries by the country's print and electronic press businesses, and on the other hand, demonstrate the acquisition of administrative experience and growth, which has led the General Secretariat for Communication and Media to initiate discussions and procedures for the strengthening of the existing legislative framework, which is expected to be completed by the end of the first semester of 2025. More concretely, on the 26th of February 2025, the Deputy Minister to the Prime Minister, Mr Pavlos Marinakis, presented to the

Council of Ministers a draft of the legislative modifications of law 5005/2022, issued a respective Press Release on the same date¹⁶, where, *inter alia*, he stressed the substantial increase of audits, on-site as well as through random sampling and he underlined the importance of the enhancement of transparency and accountability of the operation of print and on-line media, in order to preserve that every euro which will be provided by state advertising and state aid to media businesses, will be dispensed to those that meet the legislative requirements of MET and MHT registries, respectively.

With regard for the concern to enhance transparency in the ownership status of media, the legislative initiatives to be discussed do not modify the existing certification requirement in MET and MHT, respectively, by virtue of which the ownership details must be indicated in a visible place on the identity of the printed or electronic press, respectively, accompanied, of course, by the relevant supporting administrative documents (see the share register in which the percentage of shares of each shareholder/partner of the printed and electronic press company is indicated, company statutes, etc.); on the contrary, they reinforce it with the concern to increase sample checks, as well as annual, random automated sample administrative checks, based on the methods of statistical science, at a rate of a) 15% on daily newspapers with nationwide circulation, b) 15% on other of national newspaper circulation, c) 15% on daily regional newspapers, d) 15% on weekly regional newspapers, e) 15% on daily local newspapers, 15% on weekly local newspapers, f) 15% on regional publications with a circulation frequency of more than fortnightly, g) 15% on magazines and h) 15% on the electronic press.

As far as it concerns the administrative burden around the verification of ownership databases, Greek authorities are at the pleasant position to inform that the Department of Media Registries and Transparency of the Directorate for Media is equipped, since the implementation of law 5005/2022, with ten administrative public servants of high educational profile, administrative skills and standards, a requirement that, in combination with an effective management based on principles of discipline, division and organization of work, remuneration and unity of Direction, lead to the establishment of the registries. As a concluding remark, the administrative team is sufficiently adequate in terms of quality and quantity in order to meet the administrative burden that is occurred by the operation of MET and MHT, respectively.

The smooth and effective operation of the Printed and Electronic Registries was significantly supported by the electronic platform for submitting supporting documents by businesses. The operation of the electronic platform resulted in the reduction of administrative burdens for the governed, the limitation of bureaucracy, the acceleration and simplification of procedures, and full transparency.

9. The written input mentions that the almost two years operation of the MET and MHT registries also led to establishment of a solid

¹⁶ <https://media.gov.gr/deltio-typou-yfypourgou-para-to-prothypourgo-pavlou-marinaki-gia-to-proteinomeno-schedio-nomou-pou-parousiastike-sto-ypourgiko-symvouliao/>

and reliable system of audits, on-site as well as through random sampling. Can you tell us more about how these audits function?

The two-year operation of the MET and MHT Registries, respectively, has led to the establishment of a solid and reliable system of audits, both on-site and random sampling, which has strengthened the prestige of the Registries, as well as their credibility in the media sector, especially the MET (print). The findings from the audits conducted have led to relevant deletions and dismissals from MET. More specifically, for the registration (initial certification) or renewal of the registration of beneficiaries (renewal of certification) in the registries, the competent Transparency and Registries Department of the Secretariat General for Communication and Media carries out an audit of the supporting documents submitted on a case-by-case basis and the corresponding decision is issued. In the event that the verification of the supporting documents reveals non-compliance with the conditions of the above legislative framework, the Transparency and Registries Department rejects the application for registration or renewal of the registration of the print media company.

According to article 17 of Law 5005/2022, the Department of Printed and Electronic Registries and Transparency carries out annual random automated sample checks, at a rate of at least fifteen percent (15%). In 2023, the sample of these checks amounted to 54 business publications, which were selected randomly and without any intervention by the Service, at a rate of 15% of the total number of 360 certified publications in the MET. Following the sample check of the 54 publications completed in 2024, three (3) daily newspapers with nationwide circulation were rejected.

Also, in accordance with article 19 of law 5005/2022, the Department of Printed and Electronic Registries and Transparency carries out on-site inspections of registered businesses, in accordance with the criteria described in article 18 of law 5005/2022. To date, on-site inspections have been carried out on 27 newspapers, of which four (4) were deregistered by the MET. Regarding the procedure for conducting on-site inspections, it is worth noting that, following a complaint, a service team from the Secretariat General, usually consisting of three officers, who are distinguished for their competence and administrative experience in on-site inspections, appear unannounced at the headquarters of the print and electronic businesses, respectively, equipped with inspection reports, which include all the supporting documents to be inspected that are included in the conditions for the certification in the MET and MHT, respectively. Subsequently, the service team draws up a confidential inspection report, which it documents, based on the findings obtained, if the print and electronic businesses remain aligned to the MET and MHT registries, respectively.

10. It is also mentioned that pursuant to article 17 of Law 5005/2022, the annual automatic random audits, which are based on scientific statistical methods are carried out to at least 15% of the certified businesses in the Registries of printed and electronic media and that in 2024, the Authority completed 100% of the relevant sample auditing. Can you tell us more about the outcome of these random audits and the scientific statistical methods used to determine them?

As already mentioned in question 8, in accordance with article 17 of Law 5005/2022, the Department of Printed and Electronic Registries and Transparency carries out annual random automated sample checks, at a rate of at least fifteen percent (15%). It is worth emphasizing that the draft legislative initiatives presented by the Minister reinforce the provision for an increase in sample checks by 5% for certified publications in the MET and an increase in sample checks by 3% for certified websites in the MHT, as well as annual, random automated sample administrative checks, at a rate of a) 15% on daily newspapers with nationwide circulation, b) 15% on other newspapers with nationwide circulation, c) 15% on daily regional newspapers, d) 15% on weekly regional newspapers, e) 15% on daily local newspapers, 15% on weekly local newspapers, f) 15% on regional publications with a periodicity of more than fortnightly circulation, g) 15% on magazines and h) 15% on the electronic press.

In the year 2024, the sample of these audits amounted to 54 business publications, which were selected randomly and without any intervention by the Service, at a rate of 15% of the total number of 360 certified publications in the MET, based on scientific methods of statistical science. Following the sample audit of the 54 publications completed in 2024, three (3) daily newspapers with nationwide circulation were rejected, due to failure to meet the required number of journalists for one and failure to meet the required number of other staff/employees for the other two.

11. The written input mentions that the selection for the new CEO of ERT was done through a public tender in accordance with Law 5062/2023. Can you provide further details about the selection procedure? What is the state of play of the selection procedures for the Chairman of the Board of Directors and the Managing Director of ERT? Has the parliamentary hearing procedure entailed already taken place and has the Special Permanent Committee on Institutions and Transparency of the Hellenic Parliament already provided an opinion in accordance with Law 4173/2013?

Law 5062/2023 was a landmark reform aimed at transparency and meritocracy.

Law 5062/2023 has recently entered into force for the selection of the management of legal entities of the public sector in application of the

constitutional principles of equality and meritocracy, with particular emphasis on the required substantive qualifications.

The selection procedure is formulated according to transparent and fair criteria under the supervision of the constitutionally guaranteed Independent Authority of the Supreme Council for Civil Personnel Selection (Article 4 of L. 5062/2023).

The selection for the position of the Chairman of the Board of Directors and the Managing Director for ERT S.A. shall be regulated in accordance with the procedure provided for in Article 4 of this Law and shall specifically include:

- issue of a call for expressions of interest by the supervising Ministry, following the agreement of the Supreme Council for Civil Personnel Selection.
- written examination of candidates
- drawing up a list of candidates on the basis of the results of the written test
- verification of the candidates' qualifications for the first fifteen (15) posts
- ranking of eligible candidates on the basis of their formal educational qualifications and experience
- drawing up provisional lists
- submission of objections within a time limit of five (5) days
- examination of objections by the competent selection board within eight (8) days and publication of the final lists
- interview of the top 7 scoring eligible candidates
- establishment of a list by the competent selection committee of the three (3) most successful candidates, which is sent to the supervising Minister.
- one (1) of the three candidates on the above list is selected and appointed by decision of the General Assembly of the company, on the recommendation of the competent Minister.

By decision of the General Assembly (on the recommendation of the competent Minister), one of the three most suitable candidates for the position of Managing Director of ERT SA was selected and appointed, after completion of the procedure provided by law by a five-member independent Committee, chaired by an advisor of the Supreme Council for Civil Personnel Selection (article 4, paragraph 9 of L. 5062/2022). In addition, the General Assembly took into account the favorable opinion of the Parliament's Committee on Institutions and Transparency (article 9 paragraph 2 of Law 4173/2013), which was expressed following the parliamentary hearing procedure, a transparent and public procedure, which was broadcast live on the Parliament's channel.

As regards the selection of the Chairman of the Board of Directors of ERT SA, the procedure described above is about to be completed. It is underlined that for the selection of the Chairman of the Board of Directors, the procedure foreseen for the parliamentary hearing for the provision of an opinion by the Parliament's Committee on Institutions and Transparency will take place (article 9 paragraph 2 of Law 4173/2013).

The above reform in the appointment process of the heads of public media highlights Greece's commitment to strengthening their independence, in full alignment with the new Regulation (EU) 2024/1083, the European

Media Freedom Act (EMFA). The process follows all relevant provisions of the EMFA, ensuring a transparent and fair selection. Specifically, it includes strict criteria for both the selection and dismissal of heads, enhancing the integrity and autonomy of public media.

12. Are there any legislative changes envisaged when it comes to the appointment of ERT's administration, notably regarding the advisory role of the Parliament's cross-party Committee on Institutions and Transparency, the definition of qualifications for candidates or the conditions for dismissal or safeguards against revocation?

For the selection and appointment of the Chairman of the Board of Directors and the Managing Director of ERT SA, Law 5062/2023 on the new system of selection of public sector administrations applies. ERT SA is among the first public limited companies to apply the law for the selection of the Chairman of the Board of Directors and the Managing Director.

The new law provides that the procedure of parliamentary consultation or opinion for the selection of administrations is maintained where this is specifically provided for. For ERT SA, the procedure of parliamentary hearing for the provision of an opinion by the Parliament's Committee on Institutions and Transparency is provided for in paragraph 2 of Article 9 of Law 4173/2013. The object of the Committee is the parliamentary monitor over the independent administrative authorities and over the mass media, as well as the elaboration of proposals that contribute to the transparency of public life. It consists of members of all political parties represented in the Greek Parliament. It is a transparent and public procedure, which is broadcast live on the Parliament channel. Moreover, the operation of the Committee is governed by the Rules of Procedure of the Greek Parliament, and specifically by Article 49A of these Rules.

Article 5 of L. 5062/2023 sets out the qualifications required to participate in the selection procedure for the position of Chairman of the Board of Directors and Managing Director of companies, which are:

- (a) Degree from an institution of higher education or a postgraduate or doctoral degree
- (b) a very good knowledge of English or French or German or Spanish or Italian; and
- (c) at least 10 years' professional experience in the public or private sector, of which at least five years must have been relevant to the subject matter of the body's activities or to its management.

Also, according to paragraph 1 of Article 10 of Law 5062/2023, the term of office of the Chairman of the Board of Directors and the Managing Director ends prematurely in the event of:

- a) Their resignation.
- b) The deprivation of their personal liberty due to a warrant for temporary detention or a judicial decision, even in case of dismissal with a guarantee.

c) Permanent inability to perform their duties due to health or disability (physical or mental).

The term of office may also end:

a) By decision of the General Assembly due to failure to achieve the set goals as per the Performance Agreement.

b) By decision of the General Assembly in cases of significant indications of unlawful exercise of duties, based on a report from the competent Inspector or the initiation of criminal prosecution for an offense that may result in dismissal from office.

In all of the above cases, the premature termination of the term of office occurs without compensation for the public sector.

The qualifications required for the appointment of the other members of the Board of Directors of ERT SA, except for the employees' representative, are described in paragraph 3 of Article 8 of Law 4972/2022 as follows:

(α) A degree from an institution of higher education

(b) at least five years' experience in the public or private sector.

In addition, one of the other members of the Board of Directors has proven sufficient knowledge in auditing or accounting or another field of economics.

The term of office of the other members of the Board of Directors is terminated if it is found that they do not meet the conditions under which they were appointed.

In particular, in order to be appointed as Chairman of the Board of Directors, Managing Directors and other members of the Board of Directors, they must not be ineligible under Article 8 of Law No. 4972/2022. Specifically:

- Any person who is President, Vice President, Managing Director or member of the Board of Directors of the company is prohibited from being President, Vice President, Managing Director or member of the Board of Directors of another public limited company

- The Chairman, Vice-Chairman, Managing Director or member of the Board of Directors of the company may be Chairman, Vice-Chairman, Managing Director or member of the Board of Directors of the parent company or a subsidiary of the group, without any additional remuneration or compensation

- No person may be appointed as Chairman of the Board of Directors, Managing Director or other members of the Board of Directors of the company who cannot be appointed as a civil servant pursuant to paragraph 1 of Article 8 of L. 3528/2007 (conviction for a felony, any sentence for theft, embezzlement, fraud, extortion, forgery, forgery, disloyalty to a lawyer, bribery, oppression, disloyalty to the service, breach of duty, repeated slander, as well as any crime against sexual freedom or any crime of economic exploitation of sexual life, deprivation of civil rights by reason of conviction, deprivation of civil rights, or deprivation of legal aid (total or partial).

- They must not have a conflict of interest or a conflict of functions.

Moreover, the membership of the Board of Directors (including the Chairman of the Board and the Managing Director) of ERT SA is incompatible (paragraph 6 of Article 9 of L. 4173/20213):

(a) in the capacity of a supplier or, in general, as a contractor of ERT SA under a contract for work or services

(b) as a participant in any way in another company related to the media

(c) as a member of the Board of Directors of trade unions and associations of ERT SA employees

(d) by being a member of the Government, a member of parliament, an elected representative of local government or a political employee holding a position in a political party body.

14. The Commission is aware that the state budget for 2024 includes 220.369 million euros that are planned to be spent in communication by ministries, regions and local authorities while in recent years this amount of state advertising was in the range of 80 to 90 million euros. Can you provide further details as to how this money will be used and why it is a significantly higher amount than in previous years?

Communication Expenses

The largest proportion of the 234 million (i.e. about 90%) included in the State budget of 2024, corresponds to the operational expenses (including salaries) of the ERT A.E. which is the state-owned public television broadcaster. There is no significant increase compared to the previous years. In fact, the net expenses of the Secretariat General for Communication and Media (after excluding the 9 million appropriations to APE-MPE (Athens-Macedonian New Agency)) were only up to 10 million euro in 2024 (down from 21 million in 2023).

Note that the budget of 2024 (chapter 2) presents the COFOG classification, so that the expenses of ERT and APE-MPE are taken into account as communication expenses; this is why this high figure appears.

Please find below a brake-down of the communication expenses over the period 2019-2025:

Expenses related to Communication servises of the General Government (2019-2025)	2019	2020	2021	2022	2023	2024	2025
Entity	Result	Result	Result	Result	Result	Result	Budget Forecast
Secretariat General for	19	48	32	21	30	20	17

Communication and Media							
from which transfers to APE-MPE	7	9	7	9	8	9	9
Net expenses (excluding transfers to AΠE-MΠE)	12	40	24	13	21	10	8
ERT A.E. budget (includes salaries and operational expenses)	174	171	193	192	192	234	227
APE-MPE budget (includes salaries and operational expenses)	9	8	10	10	10	12	11
TOTAL	195	218	227	214	223	256	246

15. Can you clarify what is the procedure for the appointment/replacement of Committee members of the Ethics Committee (Committee of Deontology) established by Article 25 of law 5005/2022? Has the Committee already reviewed any complaints? If so, how many and of what nature?

Special reference should be made to the provision for the independent Committee of Deontology of Article 25 of law 5005/2025 to ensure adherence with the journalistic rules of ethics, comprised by distinguished members with expertise in the media sector. This Committee is charged with reviewing complaints by anyone with a legitimate interest against a print or electronic information medium, for not conforming to the rules of journalistic deontology and ethics, according to the Journalistic Professional Codes of Ethics and Deontology of the Journalists' Union of Athens Daily (ESHEA) and the Panhellenic Federation of Journalists' Unions (POESY), that are in place. More precisely, the Committee of Deontology counters all types of expression at printed and electronic media that incite, promote, spread or justify violence, hatred or discrimination speech.

The office term of the Committee shall be two years, while most of the members of the independent Committee are representatives elected by the journalists' press unions, among their own members. The rest of the members of the Committee are representatives from Academic Institutions with a specialization in journalism, communication and mass media, who are appointed by the academic staff of the relevant departments, as well as a representative from the National Council for Radio and Television and from the non-profit organisation "*Foundation for the Promotion of Journalism of Athanasios Vassiliou Botsi*", who will serve as the President of the Committee.

In this regard, attached is the Decision No. E/95/17.02.2023 (B' 921) of the Deputy Minister to the Prime Minister on the subject: "*Balanced and rotating representation in the Committee for the observance of the principles of journalistic ethics and conduct based on article 25 of law 5005/2022 (A' 236)*", which determines the members of paragraphs b', d' and i' of par. 2 of article 25 of the above law who participate in the above Committee. According to par. 3 of the above decision, the members participating in the Committee are appointed, with their alternates, by the bodies from which they come. Due to the imminent expiration of the term of office of the members of the above Committee and in order for the Department to proceed with its re-establishment, in accordance with par. 2 of a. 25 of law 5005/2022 in combination with the no. E/95/17.02.2023 (B' 921) Decision of the Deputy Minister to the Prime Minister on the subject: "*Balanced and rotating representation in the Committee for the observance of the principles of journalistic ethics and conduct based on article 25 of law 5005/2022 (A' 236)*" which determines the members of par. b', d' and i' of par. 2 of article 25 of law 5005/2022 who participate in the above Committee.

Although the Committee has not been convened either ex officio, or at the discretion of its members, or following a complaint by anyone with a legitimate interest, through the printed or electronic media, nor has it been charged with examining or dealing with the matters complained of, however it has played a significant role as regards the insurance that each print or electronic medium, which receives financial support approved either by the Commission or it's in alignment with the provisions of EU Regulation 2023/2831 de minimis, meets the rules of journalistic deontology and ethics, according to the Journalistic Professional Codes of Ethics and Deontology of the Journalists' Union of Athens Daily (ESHEA) and the Panhellenic Federation of Journalists' Unions (POESY), that are in place.

However, as a concluding remark, it's worth mentioning that the Committee, so as an ex officio body, as well as an independent administrative body by the nature of its role, has been well established to the media ecosystem as a self-regulatory body, conducted by the principles of integrity, transparency and responsibility.

16. The written input mentions that since September 2024, the Secretariat General for Communication and Media has been operating the new, upgraded, modern information system "e-Pasithea". It further mentions that in autumn of 2024, a letter was addressed to the public sector entities regarding their obligation to prepare and submit a media plan for the year 2025, to submit reporting statements and a report on the communication actions of these bodies for the year 2024. Were the latter reports already received and are they public?

Since September 2024, the General Secretariat for Communication and Media has been operating the new, upgraded, and modern information system "e-Pasithea" for the submission of communication promotion programs for approval, as well as for the submission of financial statements and activity reports by public sector entities and the wider public sector. This system serves as an essential digital tool—modern and functional—both for the General Secretariat for Communication and Media and for the aforementioned entities implementing communication promotion programs. As a result, publicity and transparency in advertising activities of the public sector and the wider public sector are strengthened and ensured.

The process of reporting balance sheets and inventory data for the year 2024 has been initiated and is already underway. The notification of the entities by the General Secretariat regarding the obligation to submit their media plans and their expenditure reports regarding state advertising takes place every autumn ¹⁷.

In the information system e-pasithea, the public authorities in the context of the submission of the accounting data enter the EXPENDITURE DATA (based on Article 4 paragraph 6 of Decree 261/1997), which are publicly accessible and which include the name of the Entity, the Entity Category (central government / local government), the Communication Program / No. Decision (on the basis of which it was approved), the year of Expenditure, the type of Action, the object of Advertising Expenditure, Expenditure Amount, as well as the ACCEPTION DATA, i.e. Name, VAT Number and Headquarters (Prefecture). Also publicly accessible are the following data: the Total Approved Budgets / Total Implemented Expenditures, the Approved Budgets / Implemented Expenditures in Media, Internet, and other activities, the Approved Budgets / Implemented Expenditures in Media based in Attica and Thessaloniki and Regional Media, and the Percentage of Participation of Regional Media.

The information system "e-Pasithea" is new and is constantly enriched with new data, as it has a dynamic picture.

17. Still on the “e-Pasithea” platform, it offers a range of digital services, including the electronic submission of advertising expenditure reports and the electronic submission of applications for the approval of advertising programmes in the public sector. However, could you elaborate on why the data regarding state advertising on the platform is not publicly accessible and why there is no obligation on the part of the media to disclose advertising revenues?

¹⁷ <https://diavgeia.gov.gr/doc/90%CE%9E146%CE%9C%CE%93%CE%A87-%CE%927%CE%A1?inline=true>

Through "e-Pasithea", every citizen can access data concerning the approved media plans of public sector (with a distinction between Central Government Entities and Local Government Entities), as well as their financial reporting on communication expenses. More specifically, the following data are made publicly accessible: the Total Approved Budgets / Total Implemented Expenditures, the Approved Budgets / Implemented Expenditures in Media, Internet, and other activities, the Approved Budgets / Implemented Expenditures in Media based in Attica and Thessaloniki and Regional Media, and the Percentage of Participation of Regional Media. These data are presented in the form of statistical reports and graphs, categorized by year. Publicly accessible are also the respective approval decisions of the programmes of the GSEE as well as details of the expenditure made (under Article 4 paragraph 6 of Decree 261/1997), which include the name of the Institution, the category of Institution (central government / local government), the year of expenditure, the subject of advertising expenditure, annual amount of expenditure per institution as well as contractor details, i.e. name, VAT number and headquarters (prefecture). As the information system e-Pasithea has started its operation in September 2024 the expenditure regarding the previous year will gradually will be uploaded in the system¹⁸.

¹⁸ <https://e-pasithea.media.gov.gr/>