

MONITORING MEDIA PLURALISM IN THE EUROPEAN UNION

RESULTS OF THE MPM2025

Country report: Portugal

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Report

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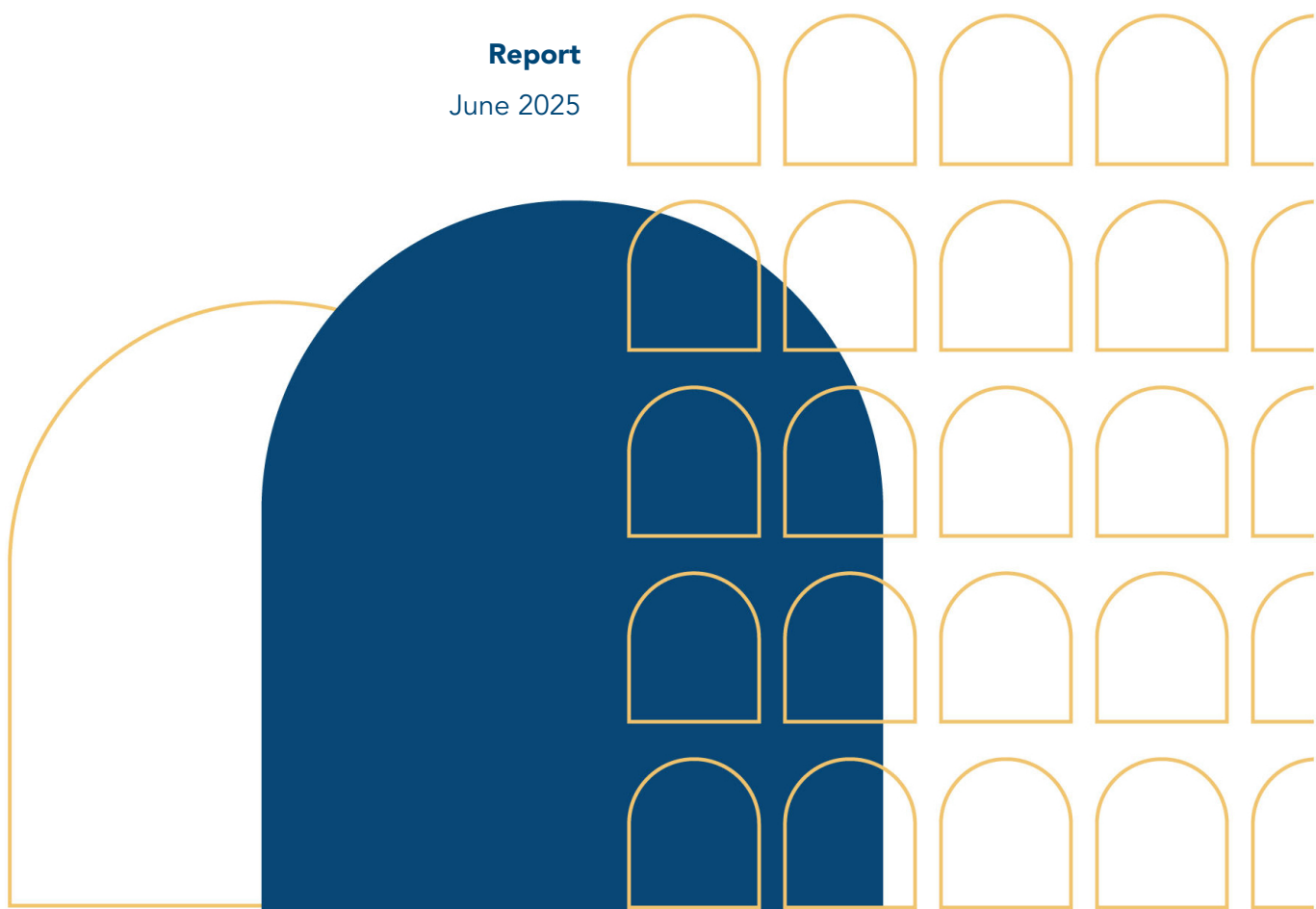


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1. Note from the MPM team

The *Media Pluralism Monitor* underwent significant transformations in 2025. First, the risk assessment was expanded from a three-tier - low, medium, and high risk - to a six-tier system, as follows:

- Very low risk (Rounded score comprised between 0 % and 16% included) - represented in green
- Low risk (Rounded score comprised between 17% and 33% included) - represented in light green
- Medium-low risk (Rounded score comprised between 34 % and 50% included) - represented in yellow
- Medium-high risk (Rounded score comprised between 51% and 66% included) - represented in orange
- High risk (Rounded score comprised between 67% and 83% included) - represented in red
- Very high risk (Rounded score comprised between 84% and 100% included) - represented in bordeaux

The adoption of the six-tier system aimed at providing a more granular assessment of the risk to media pluralism and freedom. This increased granularity also aimed at shifting from percentage-based risk reporting to risk-band reporting, that allows more comparability over the years, giving the constant changes of the MPM questionnaire.

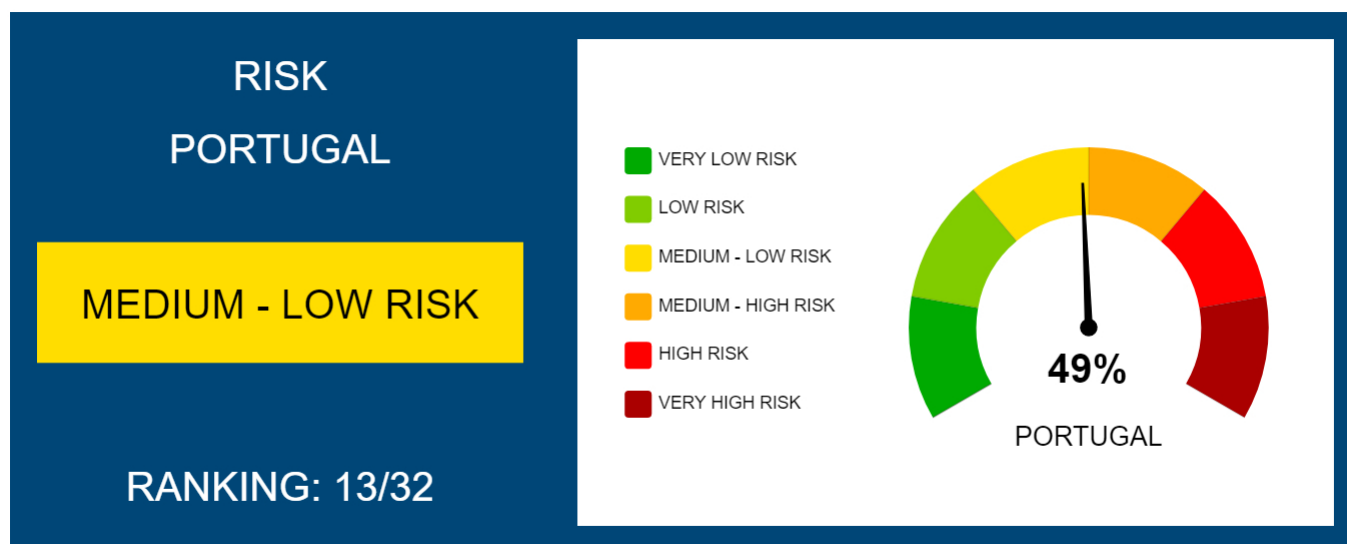
The structure of the MPM report also changed. It is now composed of three parts as follows:

- **Results snapshot** - provides an executive summary of the risks to media pluralism and freedom in the country studied.
- **In-depth results** - provides a more detailed overview of the MPM results per area, including some specific recommendations for each country
- **EMFA Observatory - Year 1 : Before the implementation** - provides a summary of the risk assessment on specific topics that are in line with the content of the European Media Freedom Act (EMFA), which will enter into full force in August 2025 in European Member States. Most of the standards mentioned in the EMFA were already monitored in the past editions of the MPM. This purpose of this section is to increase their visibility.

For specific changes in the questionnaire, please refer to Part 6 - *MPM Methodology*.

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire considering the evolution of the information and media sphere, the existence of newly available data, and based on the regular evaluation of the tool after its implementation. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Results snapshot



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Country Overview

In Portugal, 2024 was marked by legislative elections, government transition, and a change of ruling party. The AD Coalition – Democratic Alliance, formed by social democrats (PSD), centrists (CDS) and monarchists (PPM) won the legislative elections on March 16, with 28.84% of the votes, with the socialists (PS) coming in second place, with 28% of the votes. Despite this political and governmental shift, some legislative changes have been introduced in the field of the media, though their overall impact is still being assessed.

The new Public Media Service Concession Contract (CSPM RTP) was only signed in 2025 (on March 7th), and it features new elements regarding the consolidation and financial sustainability of public television and radio, as well as new prospects for evolution in the digital context. It's worth remembering that the previous contract had been in force since March 2015, with a review clause every four years or whenever justified, but the legal deadlines were not met by successive governments.

The new Media Action Plan ("Plano de Ação para os Media"), which was announced by the Portuguese government in October 2024, provides for four areas of intervention: regulation of the sector, PSM, incentives for the media, and combating disinformation and media literacy. The most significant changes in media incentives include support for hiring journalists, promoting training for journalists in the area of digital/AI and technological modernisation, support for media distribution in less densely populated areas, doubling the contribution for postage paid, and the publication of advertisements on the governance of European funds in regional and local newspapers. In its Media Action Plan, the government pledged to guarantee access to the purchase of periodicals for all the country's citizens and to support the regional and local press with 3.5 million euros in the first quarter of 2025. The government has also committed to doubling the reading incentive (postage subsidy). The set of measures, with a budget of 55 million euros, was supposed to be implemented throughout 2025 (but with the fall of the Portuguese government in March 2025, many of the proposals in this plan will not be implemented).

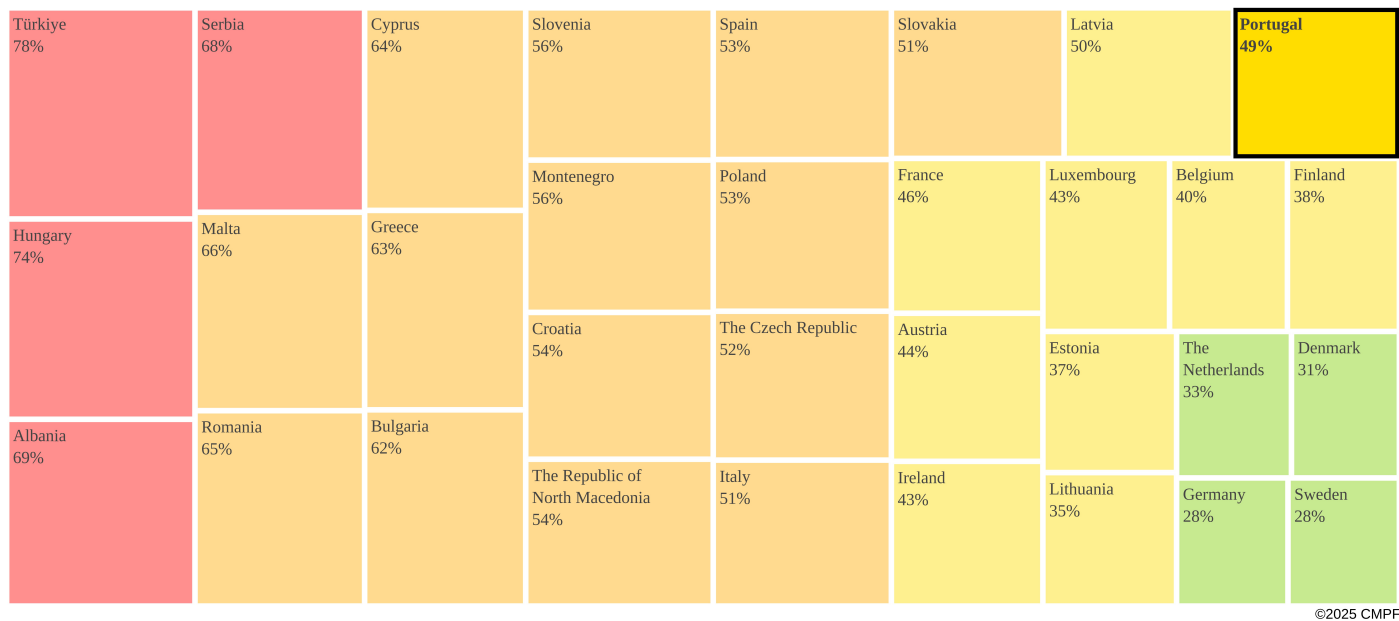
In July 2024, the Media Regulatory Authority (ERC) submitted proposals to the Portuguese Parliament and the government to amend the Media Transparency Law. In October 2024, in its Media Action Plan, the

government committed to reviewing this Transparency Law in the first half of 2025.

The Radio Law was amended in the meantime by Law no. 16/2024, enacted on February 5, with the new paragraph 2 of Article 4 stating: 'Mergers between radio operators subject to intervention by the competition regulatory authority are subject to the prior opinion of the Media Regulatory Authority (ERC), which is binding when based on the existence of a risk to the free expression and confrontation of the various currents of opinion.

Finally, the contribution to Lusa, now 95.9% owned by the state by acquiring the shares previously held by Global Notícias and Páginas Civilizadas (July 2024), increases to 21.5 million euros, 3.4 million euros more than in 2024. In this new context, where the Portuguese state now owns nearly the entire Portuguese news agency, a new governance model is being developed to safeguard Lusa's editorial independence by establishing a Supervisory Board, potentially composed of sectoral associations and employee representative bodies.

Media markets have continued to exhibit high levels of concentration, with numerous companies—particularly monomedia operators—facing considerable financial strain. The crisis involving the Global Media Group (as outlined in the previous MPM) was mitigated by the exit of the World Opportunity Fund from the shareholder structure (September, 2024) and a subsequent corporate restructuring that preserved the group's flagship brands. Nonetheless, serious concerns remain regarding the long-term sustainability of the enterprise.



The **Fundamental Protection** area scores within the medium-low risk band. Key points include:

- The Protection of freedom of expression continues to be tarnished in Portugal by legislation within the Penal Code that punishes defamation with imprisonment. Portugal still lacks effective anti-SLAPP legislation that provides the necessary safeguards to address SLAPPs.
- The country has not yet implemented the GDPR's derogation on freedom of expression and journalistic activities in a way that complies with Article 10(2) of the European Convention on Human Rights. Regarding the protection of information integrity of information, platforms' respect for freedom of expression online is not entirely clear and transparent, particularly regarding arbitrary filtering, control, and removal of online content. Concerning protection against disinformation, there is an incipient public strategy to combat this scourge in Portugal. Greater proactivity is expected in this area, particularly from the National Cybersecurity Centre (CNCS).
- Portuguese law limits the ability of whistleblowers to report directly to the authorities. There is a clear need for improvements when legislation does not comply with the best European practices.
- As far as the working conditions of journalists are concerned, the situation remains critical. There are positive expectations about the new government's Media Plan, which has a set of new proposals for the sector.
- Adequate budgetary conditions for strengthening regulatory activity, as well as a constitutional or statutory review to create more robust and transparent conditions for the appointment of the ERC board, are still lacking.

The evolution in the area of **Market Plurality** was globally negative, with a score within the medium-high risk band. Key points include:

- The economic situation of small and medium-sized firms is becoming increasingly complex and difficult.
- Legacy media revenues have been declining (when compared to broader trends in the Portuguese economy). This drop in revenues is observed across several markets.
- The profession of journalism is becoming increasingly precarious. The situation of freelance journalists has substantially deteriorated over the past years.
- The Portuguese government has promised a new Media Code (in a policy document called "Plano de Ação para a Comunicação Social"), which could better regulate the sector and address the significant

challenges faced by various stakeholders. However, the Code has not been released yet.

- The Media Authority (ERC) has submitted a proposal to revise the legislation governing transparency in media ownership. But this initiative has not yet been concluded.
- The Global Media Group underwent a restructuring, following the exit of the World Opportunity Fund, which led to the creation of two different media operators and the preservation of its main brands.

POLITICAL INDEPENDENCE

LOW RISK

The **Political Independence** area scores within the low-risk band. Key points include:

- RTP signed in March 2025 the new Public Television Service Concession Contract, valid until 2031. There are new obligations, such as expanding digital services, media literacy actions, strengthening territorial cohesion, increased coverage of the Portuguese-speaking world, support for independent audiovisual production, more cultural programmes and a programme service based on audiovisual archives. A voluntary redundancy plan covering around 250 workers is also included. The funding structure remains the same as in 2015 (the date of the previous review), in a scenario of new needs for updating infrastructure and developing skills to create innovative digital content. After several protests from RTP and other political forces and civil society, the government dropped the proposal to withdraw advertising revenue until 2027 but maintained the recommendation that RTP should gradually eliminate all commercial television advertising. This measure would have an impact of around 6.6 million euros in reduced revenue.
- In July 2024, the state bought 45.71% of Global Media and Páginas Civilizadas' stake in Lusa for 2.49 million euros, giving it 95.86% of the news agency's capital. Several episodes have delayed the clarification of Lusa's future governance model, ensuring its independence within a new framework of a company wholly owned by the State. The purchase of a minority stake in Notícias de Portugal (2.72 per cent) and the definition of the new regime of benefits to be granted to local and regional media have yet to be finalised. The government proposes to increase the discounts up to 75% for regional and local media when buying news services from Lusa, making Lusa one of the pillars in the fight against news deserts and disinformation.
- The media sector remains in crisis, with new company bankruptcies and further layoffs expected in 2025. Low wages and deteriorating working conditions make it difficult to retain talent. This structural situation weakens editorial autonomy, exposing journalism to practices that compromise its independence, such as increasing sponsored content, pseudo-news coverage commissioned by various public and private entities, and the rising of low-quality content, typically commentary and political opinion, to the detriment of factual information. The Action Plan for Social Communication does not include grants or other support to promote investigative journalism or other forms of quality journalism.
- The Global Media case in 2024 demonstrated the seriousness of the risks of media capture by interests contrary to the defence of journalism. Despite vocal protests from the journalist community, the delay in ERC's intervention to suspend voting and property rights due to lack of transparency proved how

difficult is to guarantee effective compliance with the Transparency Law, preventing financial funds held by unknown parties and based on tax havens from acquiring decisive stakes in media groups.

SOCIAL INCLUSIVENESS

HIGH RISK

The **Social Inclusiveness** area registered a high-risk score. Key points include:

- Despite changes in the Penal Code in 2024 (namely expanding the conduct covered by Article 240, which describes the crime of discrimination and incitement to hatred and violence), legal requirements make it difficult to apply the criminal offence entailed by hate speech and/or hate-motivation in practice. Initiatives concerning monitoring and protection against online hate speech are growing, but are still limited.
- Local news media are increasingly affected by financial pressures and face several challenges in securing economic stability. The Portuguese government's Media Action Plan (announced in 2024) contemplates support for local media, but its implementation strategy and impact are still unknown. The same can be said for the national media education plan proposed in the same document.
- A "Literacies" pilot project (in seven schools) has started in 2024, with an optional module dedicated exclusively to media literacy.
- The latest ERC Pluralism and Diversity report (2024b) states that most marginalized communities are underrepresented in media content and news coverage. The electoral consolidation of the extreme right-wing party in parliament, with significant activity on social networks, had repercussions on media coverage and framing, frequently following a securitarian agenda.
- The latest ERC Pluralism and Diversity report (2024b) also states that gender inequality in management and executive boards, news media coverage, and opinion-making are particularly visible.

3. In-depth results

Portugal



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This year, the highest risk situation arises in the area of **Social Inclusiveness**, which now presents a high risk. In the area of **Market Plurality**, we also have persistent problems regarding market concentration. In the case of **Fundamental Protection**, the situation has worsened slightly as Portugal still has critical issues to resolve. **Political Independence** remains the most stable area, with a low level of risk.

Although the **Fundamental Protection** is not considered to be a critical situation—it presents a medium-low risk—there is, however, reasons for concern regarding some indicators. The most critical indicator is **Protection of freedom of expression**, with a medium-high risk. Two aspects contribute to this increased risk. Firstly, the issue of criminalizing defamation, which in Portugal continues to be punishable by the most severe penalty—imprisonment. Another worrying aspect has to do with the need to quickly legislate "anti-SLAPP" provisions to protect journalists against abusive lawsuits aimed at silencing them. Furthermore, there is an absolute need to implement legislation regarding the GDPR derogation for freedom of expression and journalistic activities in a way that complies with Article 10, paragraph 2 of the ECHR. The other indicators for the area present a medium-low risk: **Protection of the right to information; Protection of information integrity, Journalistic profession, standards, and protection and Independence and effectiveness of national regulatory authorities**. Such a risk highlight the need for greater investment in protection against disinformation, protection of whistleblowers, improvement of working conditions and professional safety for journalists, and, finally, the strengthening of the economic and political independence of the main media regulator (ERC).

The situation in the **Market Plurality** area is assessed at medium-high risk, primarily due to significant ownership concentration issues. **Plurality of media providers** is associated with a very high risk, while **Plurality in digital markets** is associated with a high risk. Consequently, there is an urgent need to revise media policies to address market distortions and financial sustainability challenges. It is crucial to find solutions to prevent transparency and economic crises like the one that affected the Global Media Group in 2023 and 2024 (Lima, 2024). Regarding Media viability and Editorial independence from commercial and owner influence, the risk is assessed as medium-high. The only indicator scoring in the low-risk band is

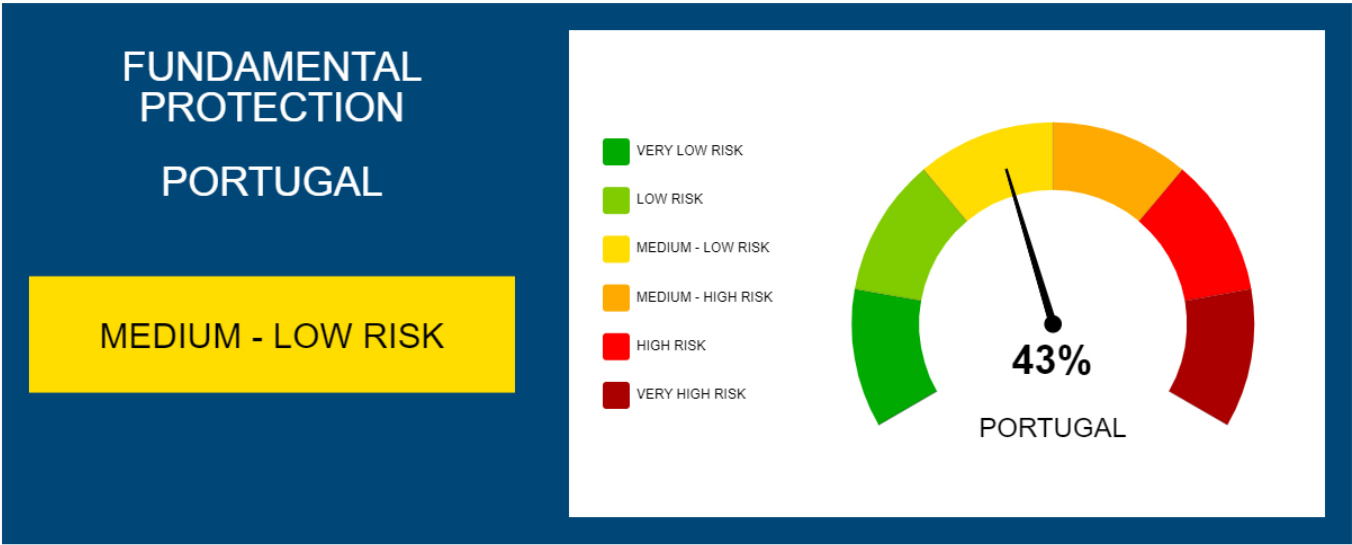
Transparency of media ownership.

Political Independence maintains low risk. The legal framework protects media independence and broadly prevents conflicts of interest. The public sector is independent and has guaranteed the integrity of political information during elections. However, the pressure of polarization and deregulation of digital media calls for an integrated legislative review, strengthening of transparency mechanisms, and combating disinformation practices that have become intrinsic to political debate. Ethical debates are rare and the culture of self-regulation lacks implementation and consensus within the professional community. The state support for the media sector has been improved but the full package was not implemented due to political instability leading to anticipated elections in May 2025.

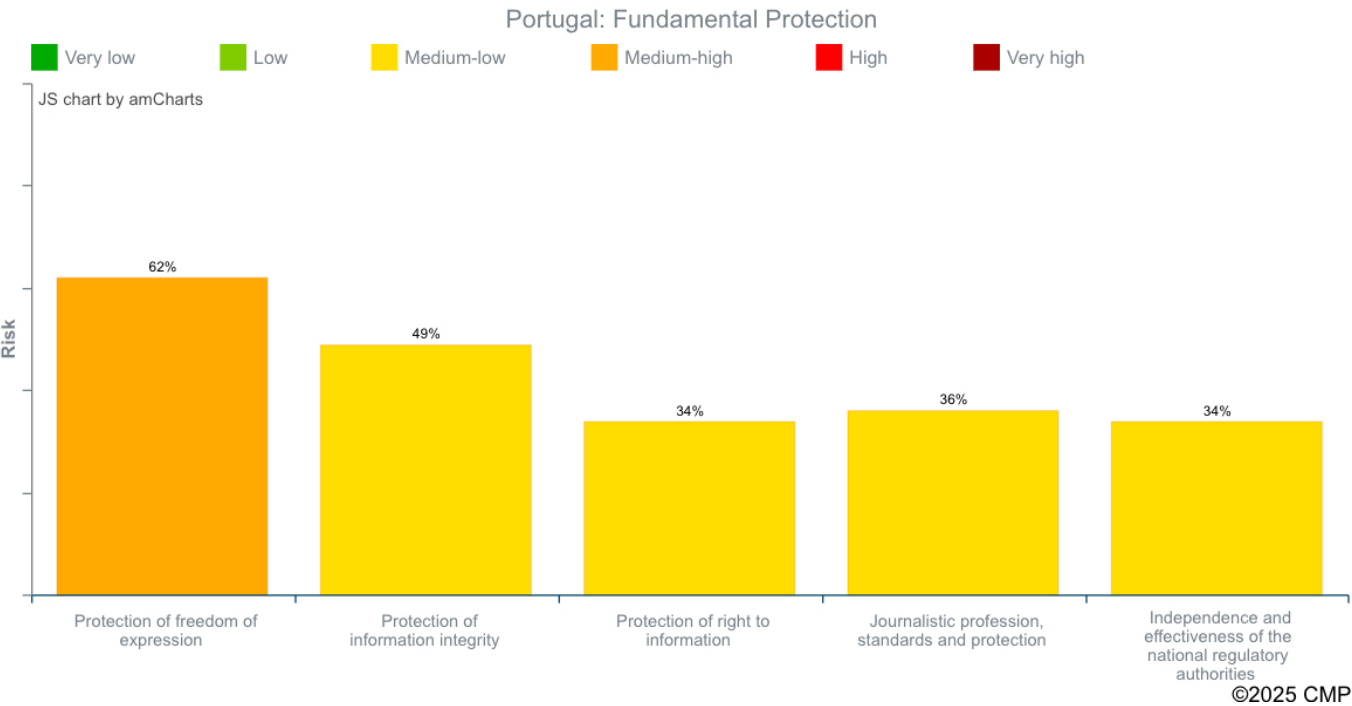
The area of **Social Inclusiveness** is the highest scoring area, with a high risk score. The critical scenario is mainly due to significant sustainability issues concerning local media, gender inequality in media management and representation, as well as the scarce presence and stereotypical framing of marginalized communities in media content.

3.1. Fundamental Protection

The Fundamental Protection area considers the necessary preconditions for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression; the right to seek, receive and impart reliable and accurate information; favorable conditions for the free and independent conduct of journalistic work; the presence of independent and effective national regulatory authorities.



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This year, for the first time, the area of Fundamental Protection has been classified as medium-low risk, and several indicators have worsened. The results of two indicators in this area in particular contributed to this new classification: **Protection of freedom of expression** (medium-high risk) and **Protection of the integrity of information** (medium-low risk). In short, we still have situations in which international standards on freedom of expression are not fully upheld, and defamation is a criminal offense, i.e., defamation can even be punished with a prison sentence (Albuquerque, Mateus & Marcelino, 2024; Mota, 2024). This scenario indicates that there is still no proportional balance between the protection of freedom of expression and the dignity of the individual. Portugal also still does not have effective anti-SLAPP legislation or other

legislation that provides the necessary safeguards to deal with SLAPPs. Furthermore, the country has not yet implemented, through national legislation, the GDPR derogation on freedom of expression and journalistic activities in a way that complies with Article 10(2) of the European Convention on Human Rights.

PROTECTION OF FREEDOM OF EXPRESSION

MEDIUM - HIGH RISK

In Portugal, freedom of expression (FoE) is enshrined in the Constitution, namely in Article 37: Freedom of Expression and Information. The Portuguese legal framework effectively safeguards against arbitrary interference in terms of FoE, as evidenced by the Portuguese Constitution and Article 38 (Freedom of the Press and Media). The country has ratified the European Convention on Human Rights without reservation. The most problematic regulatory issues are related to defamation legislation: in Portugal, defamation can be punished with a prison sentence, as provided for in the Penal Code, Law 48/95, Chapter VI, 'Crimes against honour' (Article 180); but also to the lack of a clear anti-SLAPP regulatory framework, and also to the need to implement legislation relating to the GDPR derogation on freedom of expression and journalistic activities in a way that complies with Article 10(2) ECHR.

Issues requiring particular scrutiny:

- **Respect for FoE international standard and criminalization of defamation**

Concerning legal remedies in cases of violation of freedom of expression, Portugal continues to have court rulings that are somewhat abusive in this regard, which means that legal remedies at the national level are not always effective in protecting freedom of expression, as evidenced by multiple *a contrario* decisions however by the European Court of Human Rights. Concerning the criminalisation of defamation, which can be punished with imprisonment (Penal Code, Law 48/95, Article 180), it is important once and for all to correct this article: 'Anyone who insults another person by imputing facts to them, even in the form of suspicion, or by uttering words offensive to their honour or opinion, shall be punished with imprisonment for up to 6 months or a fine (...)'. In this context, Portugal has not had a significant number of ECHR convictions since 2016 (Henriques, 2025).

- **Anti-SLAPP legislation and implementation of the GDPR derogation on freedom of expression and journalistic activities**

Concerning anti-SLAPP issues, the Portuguese government has designated the CCPJ - Commission for the Professional Journalist's Card - as a focal interlocutor for the debate on the topic, but so far nothing concrete has been said about the transposition of the EU anti-SLAPP Directive.

However, there is still no anti-SLAPP legislation or other legislation in place that provides the necessary safeguards against SLAPPs (Lusa, 2024). In terms of the implementation of the GDPR derogation on freedom of expression and journalistic activities, the Portuguese legal framework provides for generic safeguards against arbitrary interference in terms of freedom of expression and journalistic activities following Article 10.2 of the European Convention on Human Rights, as set out in the Portuguese Constitution, namely in Article 37 (Freedom of expression and information) and Article 38 (Freedom of the

press and media). Nevertheless, the derogations have not been clearly and specifically implemented (Law No. 58/2019 of August 8, ensuring the implementation in the internal legal order of Regulation (EU) 2016/679 of the European Parliament and the Council, of April 27, 2016, on the protection of natural persons about the processing of personal data and the free movement of such data), just as stated by the CSM - Superior Council of the Judiciary in its opinion "Right to information and freedom of the press versus the right to the protection of personal data." (CSM, 2023).

PROTECTION OF INFORMATION INTEGRITY

MEDIUM - LOW RISK

Respect for freedom of expression online by the platforms - both the big online platforms (VLOPs) and the big search engines (VLOSEs) - is not entirely clear and transparent as to whether they generally refrain from filtering or arbitrarily controlling/removing content online. There is some information and reports from platforms about monitoring and removing content, but it is not in-depth or fully informative. The lack of transparency and data also extends to situations where legitimate content is removed due to an error in evaluating the platforms' algorithms. In this area, access to judicial and extrajudicial dispute resolution mechanisms to complain about violations of freedom of expression online in Portugal is now taking its first steps. Anacom has sent several complaints against digital services for the first time, targeting Instagram, Facebook, and Temu. Analysing the subindicator Respect of freedom of expression online by public authorities (in terms of content moderation by the platforms), there is no clear, complete, and transparent information on the online blocks that IGAC (Statistical Bulletin, 2023) decides in the light of the Portuguese legal framework.

Issues requiring particular scrutiny:

- **Respect for freedom of expression online by platforms and by public authorities**

Both sub-indicators need more explicit, detailed, and regular information from large online platforms and public authorities. Only in this way can the best scrutiny practices and methodologies be created, whether by public entities, independent entities, researchers, or academia.

- **Protection against disinformation and FIMI**

In the field of Protection against disinformation and FIMI (Foreign Information Manipulation and Interference), there is an incipient public strategy to combat disinformation in Portugal. In partnership with other entities, the National Cybersecurity Centre (Centro Nacional de Cibersegurança - CNCS) has been developing strategies to try to minimize the phenomenon in Portugal. The Legislative Assembly has also promoted debates on the theme "Information and disinformation in the digital age." However, there are no official documents or reports on the subject. The last report this body (CNCS) published dates back to 2020. Law 15/2022 also refers to the 'right to protection against disinformation,' which is included in the Portuguese Charter of Human Rights in the Digital Age, approved by Parliament in 2021. The law stipulates that the 'State ensures compliance in Portugal with the European Action Plan against misinformation, to protect society against natural or legal persons, "de jure" or "de facto," who produce, reproduce or

disseminate narratives considered to be disinformation,' but, once again, there is no data on its application. There are several independent initiatives to monitor and debunk disinformation and conduct research on disinformation in the country, but there is no systematic or organized scrutiny or regular reporting on the subject. There are virtually no clearly identifiable measures against the manipulation of foreign information. There is no operational framework with a national strategy to monitor this increasingly critical issue in Western democracies. Researchers at ISCTE's MediaLab (academic institution) have detected, for the first time, 'signs of external interference in the Portuguese elections' with online advertising. Obviously, this issue needs another approach, that is, more regular and robust investigation, which is currently lacking in Portugal. The entities seeking to study the phenomenon are the Lusa agency, Polígrafo, Labcom's Media Trust Lab, ICNOVA, the online newspaper Observador, and the Público newspaper.

PROTECTION OF RIGHT TO INFORMATION

MEDIUM - LOW RISK

Regarding the legal protection of the right to information, the public administration sometimes denies or delays citizens' access to information. The percentage of unfavourable opinions from CADA (2024) in 2023 was still higher than 10% of a total of 515 Opinions that addressed specific access problems. It should also be noted that the average time to issue an Opinion on complaints was over 4 months, and the average time to issue Opinions on consultation requests was almost 4 months. The deadline for issuing an opinion provided for by law is 40 days. CADA states, "There are still segments of resistance to openness, which sometimes reveals itself precisely in matters of greater social impact or significance." (CADA, 2004: 3).

Portugal is not free from cases of arbitrary sanctioning of whistleblowers. The situation remains critical in this area. Meanwhile, TI Portugal has joined the Safe for Whistleblowers project. Funded by the European Union and implemented by Transparency International and our national chapters and partners, SAFE for Whistleblowers aims to support establishing an environment that enables the protection of whistleblowers in the European Union. The TI Portugal Ombudsman's Office also has a support service for Whistleblowers and victims of corruption and related offences, clarifying how to formulate and submit complaints to internal and external channels, particularly those managed by competent judicial bodies.

Issues requiring particular scrutiny:

- **Protection of whistleblowers**

Particularly critical is the issue of the Protection of whistleblowers. The country has adopted legal instruments to protect whistleblowers, but only partially. In transposing the directive (EU Directive 2019/1937) into national law, Portugal should have taken the opportunity to strengthen its impact. The law limits the possibility for whistleblowers to report directly to the authorities. In Portugal, only people who report or reveal offences based on information obtained during their professional activity are protected by law. It is also noted that general knowledge of the law among the population and the number of complaints registered are limited. According to Transparency International Portugal, there is a clear need for improvements when legislation does not comply with best practices or even in cases where it does not comply with the directive. For example, concerning external reporting: "Apart from severe crimes and administrative offences, external reporting is only possible if: there is no internal reporting channel available to the whistleblower; the whistleblower has reasonable grounds to believe that the violation cannot be

addressed or resolved internally, or that there is a risk of retaliation; the whistleblower initially filed an internal complaint without being notified of the measures envisaged or taken following the reporting within the time limits established by law. None of these aspects meet the requirements of the Directive." (TIP, 2024)

JOURNALISTIC PROFESSION, STANDARDS AND PROTECTION

MEDIUM - LOW RISK

There has been significant instability in some media groups and organizations. The main problems have to do with irregular payments, job insecurity, and some threats to the physical safety of journalists. The TIN (Trust in News) group is currently facing insolvency. We recently had a significant crisis in the Global Media group, which continues to face difficulties. And the Impala group crisis, to name just the most important ones. As was said at the Journalists' Congress, journalism in Portugal is currently in a "state of emergency." The General Strike of Portuguese journalists on March 14, 2024, was a clear sign of the crisis in the sector.

Throughout 2024, some threats and attacks against journalists were identified. We can admit that the situation may worsen, however it does not seem that Portugal is experiencing a "high-risk" problem in this regard. The cases concern, respectively, situations at far-left rallies where far-right opponents participate and police interventions against journalists; reports of fires in the centre of the country; an attack on journalists by unidentified civilians; and several threats to journalists by leaders of Chega, a far-right party. Even through anonymous testimonies, a recent study confirms that this is also a problem in Portugal: "Research shows that journalists are especially vulnerable to hostile situations that include physical or verbal violence, either online or offline. Digital environments have contributed to increasing hostility, and women journalists seem to face a double burden. Violence toward journalists may endanger journalism as an institution, and it may add to the already extensive emotional labour experienced by journalists. Yet, there seems to be a "normalization" of certain attitudes against journalists. Through semi-structured interviews with Portuguese journalists ($N = 50$), this research shows that most of them have faced violence on the job. Online abuse usually consists of threats and insults via email, social media, or comment sections, and it is often normalized within newsrooms. Offline abuse mostly covers events such as football matches, protests, political campaigns, or court hearings. Newsrooms are also a setting where journalists are under (psychological) violence, through intimidation or bullying." (Araújo, 2024).

Looking in particular at physical threats and attacks on the online safety of journalists, women, and/or LGBTQ+ journalists, it is a fact that on the platforms Mapping Media Freedom, Committee to Protect Journalists, and the Resource Centre on Media Freedom in Europe, there are no cases regarding the online safety of women, and/or LGBTQ journalists.

As for the accusation of crimes against journalists, the perpetrators of the crimes appear to enjoy some impunity. The various cases that occurred in 2024 had practically no consequences. In one of the cases, the Public Prosecutor's Office accused leaders of Chega - a far-right party - of threatening a journalist, but the current status of the matter is unknown (Franco & Gustavo, 2024). Regarding the protection of sources, Portugal has not yet adopted measures to prevent the illegal surveillance of journalists, mainly through forms of intrusive surveillance technology (e.g., spyware) on any digital device they use. There are no concrete developments following the approval of the European Media Freedom Act. In any case, intrusive surveillance of journalists is guaranteed from the outset by the constitutional text itself (articles 37 and 38, respectively - Freedom of expression and information and Freedom of the press and media).

Issues requiring particular scrutiny:

- **Working conditions of journalists**

Concerning the working conditions of journalists, the situation remains very critical, as it was last year. It is to be expected that the new government's Media Plan will contribute to some of the planned measures (incentives for hiring journalists, support for digital subscriptions by young people, combating disinformation, Action Plan for the Safety of Journalists; other benefits for the media, among others) to the general improvement of the situation of the Portuguese press and journalists. The final resolution of the 5th Congress of Journalists, which took place in 2024, is apparent on this point: 'Precarious labour, which takes on the most diverse forms and has been increasing, seriously compromises the independence of journalists and their freedom to inform. The insecurity and lack of stability the climate exposes professionals to practices that violate ethics. Journalists' passion for their profession cannot be used as a pretext for companies' unbridled exploitation of their labour. Faced with the threat posed by precarious work, today more than ever, it is necessary to strengthen solidarity between journalists and demonstrate that they remain faithful to their commitment to citizens.' (Congresso dos Jornalistas, 2024).

INDEPENDENCE AND EFFECTIVENESS OF THE NATIONAL REGULATORY AUTHORITIES

MEDIUM - LOW RISK

Let's now look at the question of the ERC's independence and, in particular, whether or not the procedures for appointing its Regulatory Board minimise the risk of political or economic interference. The legal framework appears to be transparent, democratic, and objective, as can be seen in the ERC Statutes - Articles 4 (Independence), 15 (Composition and appointment), 16 (Appointment process), and 18 (Guarantees of independence and incompatibilities). In practice, what happens is that the two largest parties (Socialists and Social Democrats) regularly agree on the names to be voted on in Parliament. On the other hand, the decision on the appointment of the regulator's chairman has not been transparent over the years, and there appears to be external influence rather than genuine internal co-optation. The influence of political power in the definition and execution of the regulator's budget and its internal organization (for example, limits on hiring) and the weight of political appointments (people associated with the party in government that appoints them) are other criteria that point to the risk of a lack of transparency in appointment procedures.

Issues requiring particular scrutiny:

- **The economic and political independence of the regulator**

Regarding ERC's budgetary independence, the budget and other resources, such as human and technical resources, are somewhat inadequate. According to the ERC Statutes, the procedures appear to be transparent and objective. The ERC's income consists of funds from the State Budget and fees and other revenues collected from entities that pursue mass media activities, proceeds of fines and financial penalties, or any other revenues, income or values that arise from its activity or that by law or contract come to be owned by or assigned to ERC, as well as any subsidies or other forms of financial assistance. But in recent

years, the government has behaved erratically in this regard, namely by delaying the transfer of funds from the State Budget to the ERC, which has made it difficult for it to function (Ascensão, 2024). Article 50 of the ERC's Statutes (approved by Law 53/2005 of November 8) stipulates that a substantial part of the ERC's own budget is to be ensured by employing funds to be transferred from the State Budget each year or through a share in the fees for use of the radio spectrum paid to ANACOM, as remuneration for use of a public asset. There is also the question of whether the media authority acts in a way that is not independent of economic and/or political influence. If, on the one hand, we cannot say - there is no evidence - that members act in a non-independent manner, on the other hand, it is a fact that we are faced with two types of upstream restrictions: on the one hand, an appointment model that must be densified, more transparent, reinforcing the legitimacy, independence, and governance capacity of the regulatory board; on the other hand, strong constraints in terms of budget and human resources, which clearly penalize the exercise of the regulatory function, creating constraints with implications for its performance and scrutiny of the sector, and consequently, reducing its complete independence. The need for a legal and constitutional review in this matter appears to be absolutely pressing. (Carvalho, 2022: 175). Likewise, it is urgent to reflect deeply on the regulation of media and digital in Portugal, so that we can concentrate the scrutiny of the sector on a single regulator and not on four entities (ERC, ANACOM - Autoridade Nacional de Comunicações, responsible for electronic communications and postal services; AdC, Autoridade da Concorrência - Competition Authority; and IGAC - Inspeção-geral das Atividades Culturais, entity specialized in the protection of copyright and related rights).

- **The action of the Digital Service Coordinator (DSC) and the content moderation of VLOPs**

The Digital Service Coordinator (DSC) is responsible for supervising the application of the digital services regulation and ensuring that information and service provision takes place in a safe, reliable, and transparent environment, in line with Regulation (EU) 2022/2065 of the European Parliament. This entity's mission is to combat the dissemination of illegal content, detect irregularities, and collect complaints, reports, and others about various situations, from misinformation to protecting minors from harmful content, gender violence, content moderation on platforms, etc. Anacom is the national coordinator and the competent authority for supervising the regulation, with the Regulatory Authority for Social Communication (ERC) being the entity responsible for the media. It is unknown whether ERC will have to deal with the platforms' content moderation. There is still no official information on the intervention of the media regulator in this matter, which, according to the law, is the institution responsible for applying the European regulation on a Single Market for Digital Services "in matters of media and other media content" (Decree-Law No. 20-B/2024, article 2 - no. 2).

Recommendations for Fundamental Protection

Recommendations for Parliament:

- Strengthen the core issues of the regulatory framework and the sectoral authority itself (ERC): the first relates to a vital issue for the transparency and sustainability of the entire media sector in Portugal: the regulatory activity itself. There are several aspects to optimise in this area. Firstly, the very authority, independence and sustainability of the ERC. It is important to strengthen the model for appointing the Board, give the regulator real economic independence, strengthen its HR so that it can quietly and regularly carry out in-depth research into the sector, and finally, review the system of sector regulation in order to concentrate in a single regulator the tasks now undertaken by 4 entities (ERC, Anacom, AdC and IGAC).

Recommendations for the Government:

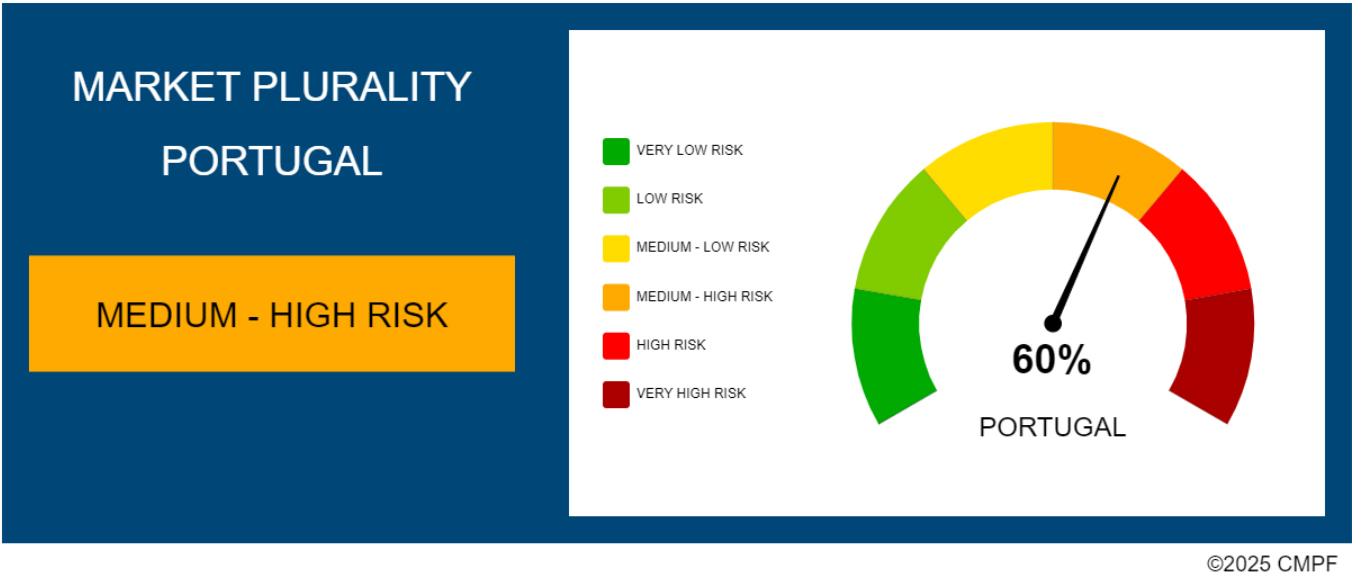
- Update specific legislation and public policies on freedom of expression. There are several aspects, all of them interconnected, which relate to respect for the international FoE standard, the criminalisation of defamation, the need for anti-SLAPP legislation and the implementation of the GDPR derogation on freedom of expression and journalistic activities. Secondly, protection of the integrity, and the right of information, in particular strengthening the fight against disinformation, whistleblower protection, and also legal protection of the right/access to information, which still has segments of resistance to openness.

Recommendations for Journalists and Public Policies:

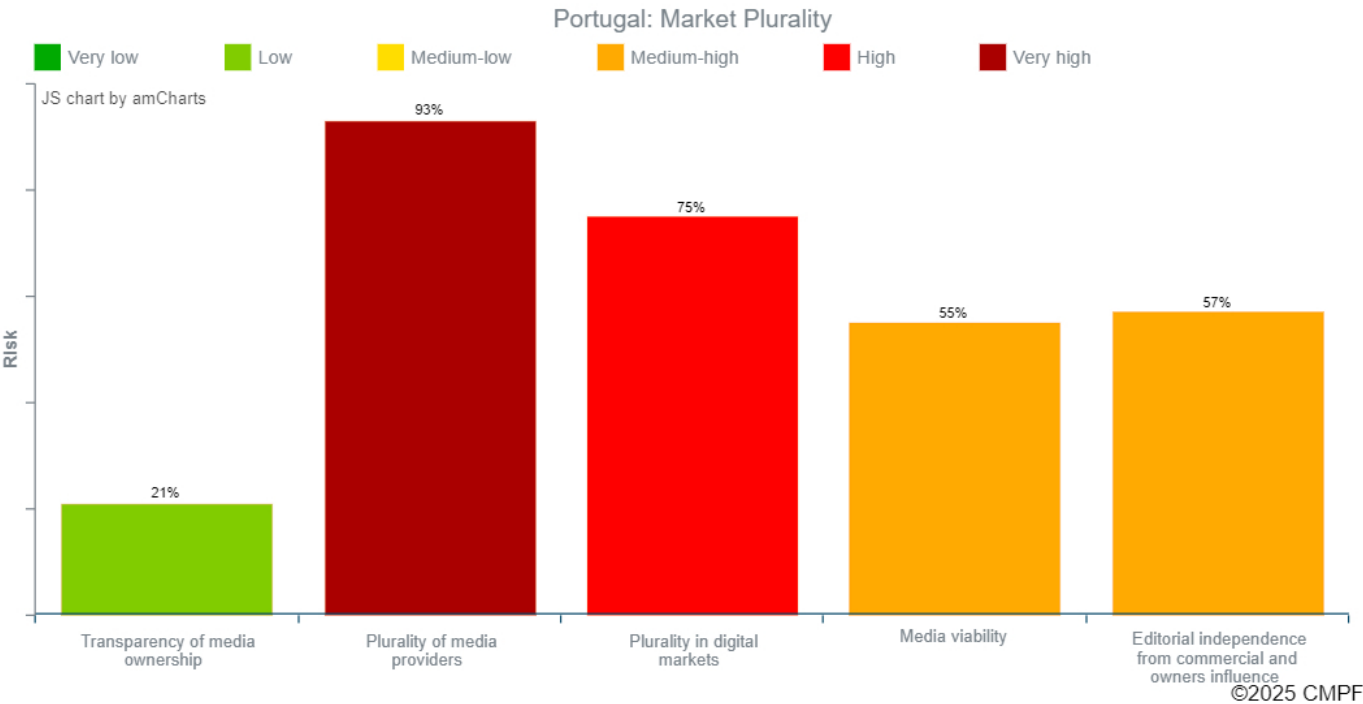
- Reform the regulation of journalistic practices and deepen the models of co-regulation and self-regulation. As for the journalistic profession, standards and protection, particularly with regard to journalists' working conditions, these must be the subject of new and strengthened public policies so that the "Fourth Estate" essential to the democratic rule of law and scrutiny of public affairs does not fall by the wayside.

3.2. Market Plurality

The Market Plurality area considers the economic factors that impact the plurality of media offer, assessing the risks deriving from insufficient transparency and high concentration of media ownership, economic sustainability of the media, and the undue influence of commercial interests and ownership over editorial choices. Moreover, the area assesses the risks deriving from high concentration of digital markets and dependency of the media on online intermediaries.



In Market Plurality, the evolution from last year was globally negative, with a score of medium-high risk in 2025. Our evaluation reveals several concerning aspects, particularly in the concentration of ownership, with the risk associated with the **Plurality of media providers** scoring at the maximum range, at very high risk. The only indicator below medium risk is **Transparency of media ownership**. Despite the overall pattern among the various indicators not being very different from 2024, there is a general worsening in the conditions of Market Plurality that must be taken into serious consideration.



The General Media Transparency Law (Lei Nº 78/2015) is primarily effective and requires companies to disclose direct or indirect ownership. This law can be considered an adequate protection for the transparency of Portuguese media markets. There is an online platform created by the media authority (Portal da Transparência) that publicly discloses the information on media groups that are obliged to do so. It is available to the public and divided into three categories: Proprietary Entities of Media Companies, Media Companies, and Search by geographical location. Most media outlets publish transparent data on their ownership through this platform.

Issues requiring particular scrutiny

- **Information gaps about ownership structures**

There are still relevant information gaps in the Portuguese media markets. The crisis of the Global Media group (Lima, 2024) is an example of information failures that can have serious consequences. The Transparency Portal (Portal da Transparência) did not have all the relevant information about the non-transparent investors. In 2024, the Portuguese media authority proposed a new version of the transparency law to the parliament.

- **Revision of the Transparency Law**

Following the ERC initiative in 2024 and the expected contribution of the Portuguese government and parliament, there is the prospect of a relevant review of the transparency law to overcome the current limitations of Law 78/2015. The new version should be more effective in preventing non-transparent investors.

Portugal has four dominant media operators: Group Impresa, Media Capital Group, Group Cofina/Medialivre and Group RTP (Public Service Media). Global Media, traditionally considered the fifth major operator, is undergoing a phase of crisis and restructuring, facing the serious problems it encountered in 2023-24. The above-mentioned media groups usually have significant shares in several markets. A few large, powerful conglomerates coexist with many small (and fragile) media firms. Despite the presence of multiple media operators (at local, regional, and national levels), market concentration remains high (ERC, 2024; Obercom, 2024).

In Portugal, no general law still regulates the media sector as a whole and establishes objective limits to the concentration of ownership. The media authority (ERC) analyses the market transactions that generate more concentration, on a case-by-case basis. ERC essentially follows the existing laws that can be applied

to specific media. This means a somewhat limited intervention in cross media on digital media operations.

Issues requiring particular scrutiny

- **The decline of legacy media companies**

In a media sector dominated by large conglomerates and digital platforms, the financial situation of legacy firms is becoming increasingly complex and challenging. This can contribute to future bankruptcies or mergers and therefore more market concentration. The Portuguese laws are old and do not consider the new realities and complexities of media markets and business models.

- **New media policies**

The Portuguese government has promised a new Media Code (Plano de Ação para a Comunicação Social, 2024), which could better regulate the sector and address the significant challenges faced by various stakeholders. The government argues that this Media Code aims to consolidate the scattered legislation of several sub-sectors. It is too soon to evaluate the potential of this initiative, but media policy reform is crucial.

PLURALITY IN DIGITAL MARKETS

HIGH RISK

The information is not always complete and up-to-date. However, there are clear indications that large platforms (like Google and Meta) capture a significant portion of advertising investment, leading to a high concentration level. This concentrated pattern (in advertising revenues) is all the more concerning as several media firms in Portugal face significant difficulties obtaining revenues from their audiences. The Directive (EU) 2019/790 on copyright and related rights in the Digital Single Market has been fully transposed to the Portuguese Legislation. The new legislative framework includes a set of criteria to be taken into account in determining the remuneration of the providers when using copyrighted content, as well as the definition of information duties and transparency rules. However, what exists in practice is occasional support in competitions or initiatives, but not as direct compensation for rights. As mentioned before, the Portuguese government has approved an Action Plan for the media (Plano de Acção para a Comunicação Social, 2024). As a principle declaration, it states that it is necessary to find a fair and virtuous balance between different players and the various existing and emerging business models. The practical results of this plan remain to be seen.

Issues requiring particular scrutiny

- **The quality of economic and financial data**

In Portugal, operators in the digital markets do not always provide up-to-date and complete economic and financial information that allows for the evaluation of market shares, market structures, possible dominant power, and the stability of business models. In 2024, the Portuguese government expressed its intention to sponsor a major study on the sector, which could improve the situation. However, there are no results yet.

- **New regulation framework for digital markets**

Portugal has not produced adequate legislation to regulate the digital markets. There is also a need for greater protection of fair and equitable competition in the new digital media ecosystem. The Portuguese government promised some media policy changes to achieve a balanced remuneration between those who produce and those who distribute content. In this specific matter, the main objective is greater equity in the relationship between the different agents of the media ecosystem.

MEDIA VIABILITY

MEDIUM - HIGH RISK

In general, media revenues have been declining (when compared to broader trends in the Portuguese economy). This revenue drop is observed in multiple markets and companies of various sizes. The viability of "digital natives" is difficult to assess due to economic and financial information limitations. In the face of the crisis in the traditional business model of the media (advertising revenue and paid content), some projects are seeking to innovate. Looking at the possibility of generating revenue through other business lines less related to the core business, alternatives such as multimedia services, events, and marketing, among other service provisions, can be observed in 2023-24. Nevertheless, in the case of media conglomerates, these alternatives contributed less to operating revenues than advertising. A few examples can be referred to in terms of diversification of sources. SIC (TV) is betting on income related to streaming services. Expresso and Público, two critical national newspapers, are transitioning towards digital revenues and paywalled content online. Some independent brands promote crowdfunding and foundations as sources of revenue.

Issues requiring particular scrutiny

- **Income scarcity in smaller companies**

In light of the general problems in the media sector in Portugal and the crisis of traditional economic viability models, many small and local media outlets are dependent on state support programs, which have been maintained in recent years. However, to ensure a stable and consistent revenue model, these media outlets are compelled to seek innovative sources of income.

- **Precarious conditions of freelance journalists**

In general, the profession of journalist is becoming increasingly precarious. The situation of freelance journalists has deteriorated over the past years. In the recent crisis of the Global Media group, the most precarious journalists and freelancers were affected by salary and subsidy delays. This issue was addressed at the Journalists' Congress (Congresso dos Jornalistas, 2024).

Article 38 of the Portuguese Constitution enshrines freedom of the press, which translates into special protection for journalists' rights vis-à-vis the state or third parties and within the media organisation ('internal freedoms'). The Transparency Law (Lei 78/2015) establishes that media companies must maintain editorial independence from commercial interests. In Portugal, media companies separate the functions of their commercial departments from their newsrooms. There is no significant permeability between these management structures. Media organisations are obliged to respect the Press Law (Lei N. 2/99) and the Journalist Statute (Lei N. 1/99), which clearly establish this type of separation. In the context of self-regulation, it is also worth mentioning the Journalists' Code of Ethics, the editorial boards, and their internal rules (the different editorial statutes of the news organisations).

In terms of content integrity, there are laws and/or self-regulation measures that determine that the exercise of a journalist's profession is incompatible with advertising activities. The Portuguese legal framework prohibits this type of interference, but this does not entirely guarantee that it cannot occur in daily practice.

Issues requiring particular scrutiny

- **Possible interference by the management structure in the newsrooms**

Considering the integrity of the newsrooms, it is important to strengthen the importance of mechanisms that protect journalists from arbitrary interference by owners or managers. What happened in the Global Media group was symptomatic of what can happen in a newsroom, often without spilling over into the public arena. In that case, there was an evident interference by the management structure in the newsroom.

- **The multiple economic interests and connections of media owners**

There are several cases where the owners of the media companies have relevant interests, connections or activities in non-media businesses. It is the case of the Media Capital group (Mário Ferreira) and the Global Media group (Marco Galinha), the former with interests in tourism and transport, and the latter in aerospace and automation, distribution and logistics, real estate and transport. The recently created Media Livre group (Sorolla SGPS, with 32 per cent, and Cristiano Ronaldo, with 30 per cent) also has interests in various areas such as industry, business management and development, and tourism.

- **The social protection of journalists**

Regarding the integrity of the newsroom and the social protection of journalists, national Social Security legislation does not respond immediately to situations of crisis, such as the one experienced in 2024, particularly in the cases of Global Media group and Trust In News group.

Recommendations for Market Plurality

Recommendations for the Government:

- the new Media Code (promised for the 1st semestre 2025) should be approved with the input from various stakeholders and with the broadest possible political consensus;
- the current press law (Lei nº 2/99) is outdated and insufficient, necessitating a swift review to address the transformation of media markets and business models;
- updating the media concentration rules is a priority, to comply with art. 22 of EMFA;
- the media authority must be equipped with adequate resources to effectively regulate the sector's needs.

Recommendations for the Media Authority:

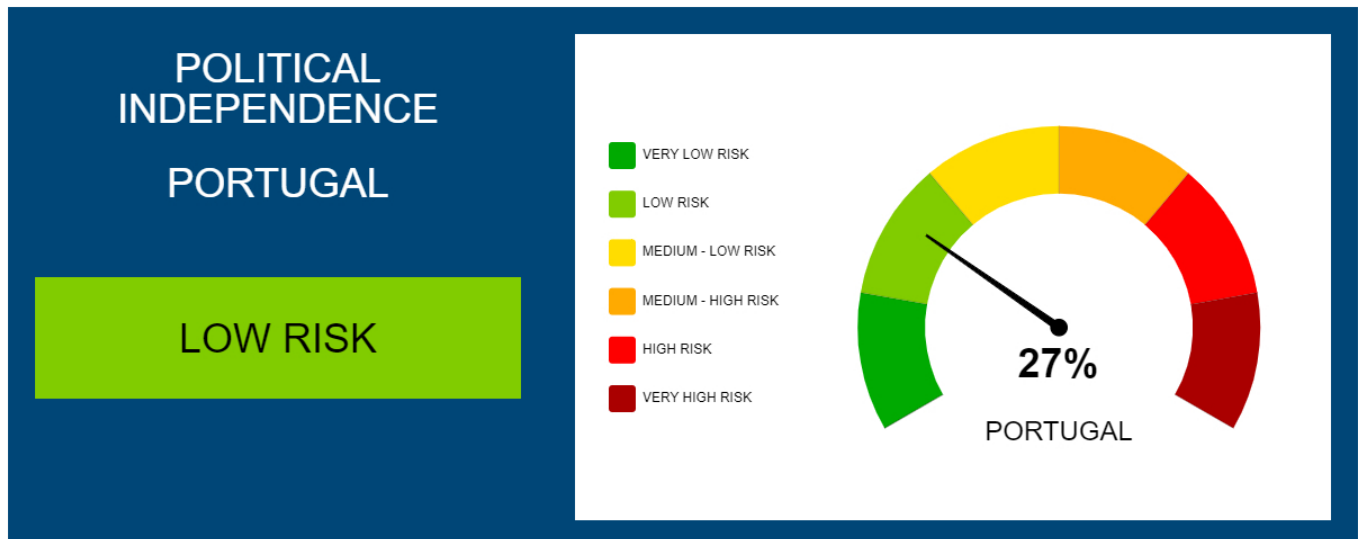
- The Portuguese media sector requires careful oversight in two critical areas: cross-media concentration and transparency of ownership changes.

Recommendations for Media organizations:

- Private-owned media firms should continue their efforts in innovation and differentiation of services and products, going beyond their traditional business model.

3.3. Political Independence

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

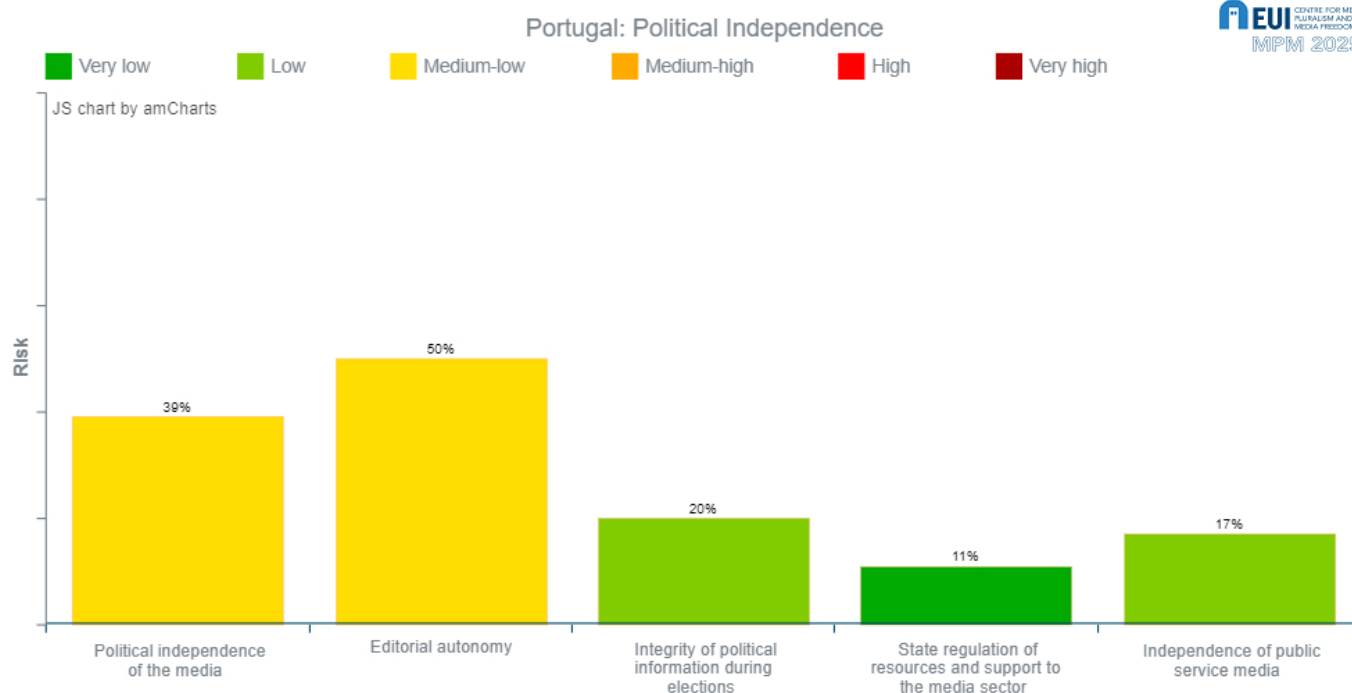


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Political Independence remains at low risk, presenting results similar to 2024. **Political independence of the media** scores a medium-low risk. The Television Law and Audiovisual Services on Demand (Law nº 27/2007 of July 30) and the Radio Law (Law nº 54/2010 of December 24) prevent politicians from owning audiovisual media. According to the Media Transparency Law and Registration Decree (Law No. 78/2015 of 29 July/Regulatory Decree No. 8/99 of June 9), media groups have extensive reporting obligations to the ERC on the shareholding structure, holders of qualifying holdings (equal to or greater than 5 % of the share capital), governing bodies, financial flows, and persons responsible for editorial orientation. However, shortcomings in effectively implementing the regulatory safeguards are detected. In July 2024, the State purchased 45.71% of the stake held by Global Media and Páginas Civilizadas in Lusa for 2.49 million euros, now holding 95.86% of the news agency's capital. **Editorial autonomy** records a medium/low results, indicating fragility of self-regulatory mechanisms. The indicator **Integrity of political information during elections** is at a low risk. Law no. 78/2015 of 29 July regulates electoral propaganda through commercial advertising media and allows purely informative advertisements in all media, including the Internet. However, there is no effective mechanism to check the digital platforms' revenues from campaign spending. Very low risk is detected for the indicator **State regulation of resources and support of the media sector**. The Action Plan for Social Communication was presented in October 2024 containing 30 measures to support the media. The **Independence of public service media** scores low risk. RTP's Public Service Concession Contract was revised in March, focusing more on digital and expanding public service functions.

Critical aspects await resolution, such as approving the new Social Communication Code, which aggregates the sector's legislation and aligns the regulatory framework with digital reality. The Press Law and the Regional Press Statute (Law No. 2/99, of January 13, and DL No. 106/88, of March 31) are examples of outdated legislation unable to define and regulate the journalistic profession in the digital context. Sectorial

legislation, like the Television and Audiovisual Services on Demand Law, and the Radio Law, don't address the challenges of digitalisation and lack integration with recent changes in European Law.



POLITICAL INDEPENDENCE OF THE MEDIA

MEDIUM - LOW RISK

The legal media ecosystem has managed to preserve the political independence of the media at low risk. The Media Transparency Law requires reporting data on the shareholder structure that allows for identifying potential conflicts of interest and direct or indirect political control over the media. Recent cases, such as the Global Media Group in 2024, which was bought by an anonymous financial fund (WOF) based in the tax haven of the Bahamas and whose ultimate beneficiaries were unknown, reveal shortcomings in effectively implementing the regulatory safeguards. Some conflicts of interest may occur without being prevented in practice since regulatory action is possible only after transparency requirements have been breached.

Issues requiring particular scrutiny:

- **Deficits in preventing conflicts of interest**

According to ERC (Deliberation ERC/2024/329), the Media Transparency Law needs revision, to speed the media regulator intervention when some of the participating companies do not comply with the transparency requirements.

EDITORIAL AUTONOMY

MEDIUM - LOW RISK

The Journalist Statute (Law n.º 1/99 of January 13) protects journalist's autonomy. The Radio Law and the

Television Law define that management or leadership positions in the information area are exercised with editorial autonomy, prohibiting the operators from interfering in the production of informative content. In the case of PSM, the ERC Regulatory Council has the power to issue a prior and binding opinion on the appointment and dismissal of information and programming directors (Law nº 53/2005, of 8 November).

The culture of self-regulation among Portuguese journalists is fragile, and several media groups with significant weight do not have codes of ethics. In most cases, the codes have not been adapted to the digital landscape. The CCPJ oversees the incompatibility of functions between journalism and other activities and has warned about the proliferation of paid content in the media and the lack of transparency in these practices. Recent episodes involving controversies between CCPJ's decisions and some journalists whose professional titles were denied due to incompatibility reveal the lack of ethical consensus. Many editorial boards see involvement in paid content projects as a legitimate way to finance media companies and there is contamination between journalistic and commercial content.

The newsrooms of the most influential media outlets have editorial boards and press councils with sufficient power to denounce possible attempts at political interference and preserve editorial autonomy in the face of other interests. However, these self-regulation instruments do not exist in smaller digital media, which are more vulnerable to being hijacked for non-journalistic uses such as selling commercial content as news and political advocacy.

Many high-profile journalists engage in political commentary, which impacts public perception of the impartiality of political news and reduces trust in journalism.

Issues requiring particular scrutiny:

- **Media ethics turn**

Most media companies don't have ethical codes suited to the digital ecosystem, offering detailed guidance in critical moments of the democratic cycle, such as electoral campaigns, disinformation and rising right-wing populism.

- **New threats to journalists**

Early elections and a climate of almost permanent political crisis bring more polarization and threats to protect media independence and editorial autonomy. There are no effective mechanisms to deal with these new threats, including reporting and denouncing forms of pressure and intimidation of journalists by political actors and related groups.

- **Selective support for quality journalism**

Public policy to support media remains detached from a clear assessment of the journalistic nature of the media outlet, namely the existence of an editorial statute, a code of ethics and a professionalised editorial team, allowing a clear separation between the journalists and those serving other communicative purposes.

- **Toxic media and political environments**

The presence in the studios of numerous “talking heads” recruited from the political sphere is a strategy that cuts across all television channels, contributing to expanding the space of influence of politicians in public space. It distorts the news dynamics, with losses in the pluralism of the content disseminated. The televised political commentary is imbalanced, with more commentators affiliated with right-wing parties and more significant exclusion of women. This scenario calls for self-regulatory measures that reduce the space for political commentary on television, increasing its transparency and pluralism and privileging informative news spaces.

INTEGRITY OF POLITICAL INFORMATION DURING ELECTIONS

LOW RISK

Law n°. 72-A/2015 (Provides for the legal regime of journalistic coverage during the electoral period and regulates electoral propaganda through commercial advertising) prohibits political propaganda during electoral campaigns and determines general principles of equal treatment between the various candidacies. The editorial treatment must respect journalistic rules (balance, representativeness, equity), but media outlets enjoy programming freedom. The complaints regarding discriminatory treatment are addressed to the National Electoral Commission (CNE) and deliberated by the ERC. Until now, it has been possible to find consensus among the various media outlets, public and private, for managing electoral debates ensuring the presence of all candidates. Public television has ensured equity, as private channels refuse to include debates in their programming with candidates without parliamentary representation.

There are risks of misinformation during elections through messages circulating on digital platforms, which go beyond the current regulatory framework targeting legacy media even if it applies, by extension, to digital media. The risks are increased by the communicative practices of the extreme right party Chega, which has been accused several times of grossly decontextualising information or using logos of journalistic brands to publish fake news.

Issues requiring particular scrutiny:

- **Ensure equal opportunities for all candidates**

Increased political competitiveness and hybrid media systems bring the risk of new forms of pressure in the organization of electoral debates and other forms of political participation that could compromise the quality of the democratic game.

- **Monitor political communication on digital platforms**

There is no effective mechanism to check the digital platforms' revenues from campaign spending. The Law on the Financing of Political Parties and Electoral Campaigns (n° 19/2003, of June 20) and the Law on the Organization and Functioning of the Political Accounts and Financing Entity (n° 2/2005, of January 10) lack effectiveness in preventing illicit spending on digital platforms. Political parties are obliged to disclose campaign spending but the law does not focus specifically on online platforms and the expenditure budgets presented by the parties are very generic.

The Media Action Plan provides for the strengthening of measures to support the media, some of which were implemented in March 2024: the National Media Literacy Plan, the National Safety Plan for Journalists, the provision of newspaper subscriptions for young people between 15 to 18, and the increase in the state contribution to the paid postage available to local and regional media. Others include measures to support the hiring of journalists, support for the distribution of publications in low-population areas and AI training actions for journalists, with approval by the end of 2025. There is a reinforcement of direct and indirect support for the media, which is more in line with existing policies in European countries. ERC monitors the State's institutional advertising through monthly reports.

Issues requiring particular scrutiny:

- **Full implementation of the Media Action Plan**

The political crisis led to early elections scheduled for May 2025, affecting the implementation of media support measures. This interruption can seriously undermine the effectiveness of the media aid package. The doubling of the state's contribution to the cost of shipping subscription local media titles was approved in December 2025 (Law-Decree n.º 41/2025) - from 40% to 80% - but most measures remain to be implemented, namely incentives for hiring journalists, free training in IA, the inclusion of local radio stations in the broadcasting rights regime in all elections (currently, the law only covers local elections), the advertising through regional or local and national newspapers of the governance model of the 2021-2027 European funds. Others are very timid, such as promoting young readers by providing 20 euros for each digital subscription to a national newspaper. This was limited to citizens between 15 and 18 years old and informative or economic publications. Some measures may not help quality journalism, like the intention to provide any citizen with 50% bonuses on digital subscriptions to media outlets registered with the ERC, regardless of their journalistic orientation.

- **Support Investigative journalism**

The Media Action Plan does not include support for investigative journalism, and the scholarships available in the country for this purpose are scarce. Alternative media with an investigative orientation subsist precariously through European funding. Private entities like the Gulbenkian Foundation have cancelled programs to support investigative journalism.

- **Support alternative media**

A small community of alternative media focuses on investigation, cultural information, proximity or greater visibility for ethnic and gender minorities. Some examples include organizations such as Fumaça, Gerador, Mensagem or Afrolink, all of which have a precarious financial structure and depend on voluntary subscriptions or occasional grants. These media are sensitive to vulnerable or underrepresented communities and contribute to reducing social and cultural inequalities, but this role is not valued by the current public policy.

- **More transparency regarding State Advertising**

There are some flaws in the law regulating state advertising. Some of the sector's representatives, such as API (Portuguese Press Association) denounced that several public entities (for example, universities and the public bank) do not respect the state's institutional advertising rules, depriving local media of funds essential for their survival. Advertising carried out by public administration is subject to transparency rules, which also extend to digital. In principle, the State does not advertise on digital platforms, but the data about the disaggregated distribution of public resources is not so detailed.

INDEPENDENCE OF PUBLIC SERVICE MEDIA

LOW RISK

The PSM governance model safeguards their independence. Law nº. 39/2014 of July 9 (Relates to the reorganisation of the public service and approval of the new statutes of public radio and television) guarantees the supervision of the work of the RTP Board of Directors by the Independent General Council, which assesses compliance with the strategic project. Appointments and dismissals from editors-in-chief depend on prior and binding opinions from the ERC, which can prevent any suspicions or discrepancies in recruiting these professionals. Public service obligations are respected, including political pluralism, although RTP is not immune to competitive pressure, and some of its editorial choices reflect this pressure. From a broader perspective of media pluralism, there are deficits in diversity, proportionality and representation reflected in news alignments.

Lusa is in the final phase of a transition process to a 100% public company, which will require a new governance model with increased guarantees of independence. This model has not yet been proposed. The agency is a trusted brand with contractually defined public service obligations.

Issues requiring particular scrutiny:

- **Lusa's new governance model within the framework of a 100% public company**

The news agency Lusa can expand its mission in the fight against disinformation and news deserts, the promotion of quality journalism, the diversification of the thematic agenda and more innovative news content, but this requires a more qualitative and less quantitative approach to the definition of public service, as it is currently established in the Public Service Contract. The Government did not clarify the regime for promoting discounts for public interest services provided by Lusa for national media (expected discounts of between 30% and 50%) and regional/local media (between 50% and 75%). This measure has a financial impact on Lusa that will require compensation.

- **More innovative ways to assess media pluralism**

ERC's annual reports remain the most credible source to assess media pluralism in PSM, but the complexity and the changes in the media landscape demand quantitative and qualitative methods that transcend the content analyses used in the reports. Due to the amount of information produced, these

reports are published with a considerable delay compared to the year under review. There is a need for more agile monitoring instruments.

Recommendations for Political Independence

Recommendations for journalists' representatives and media regulators:

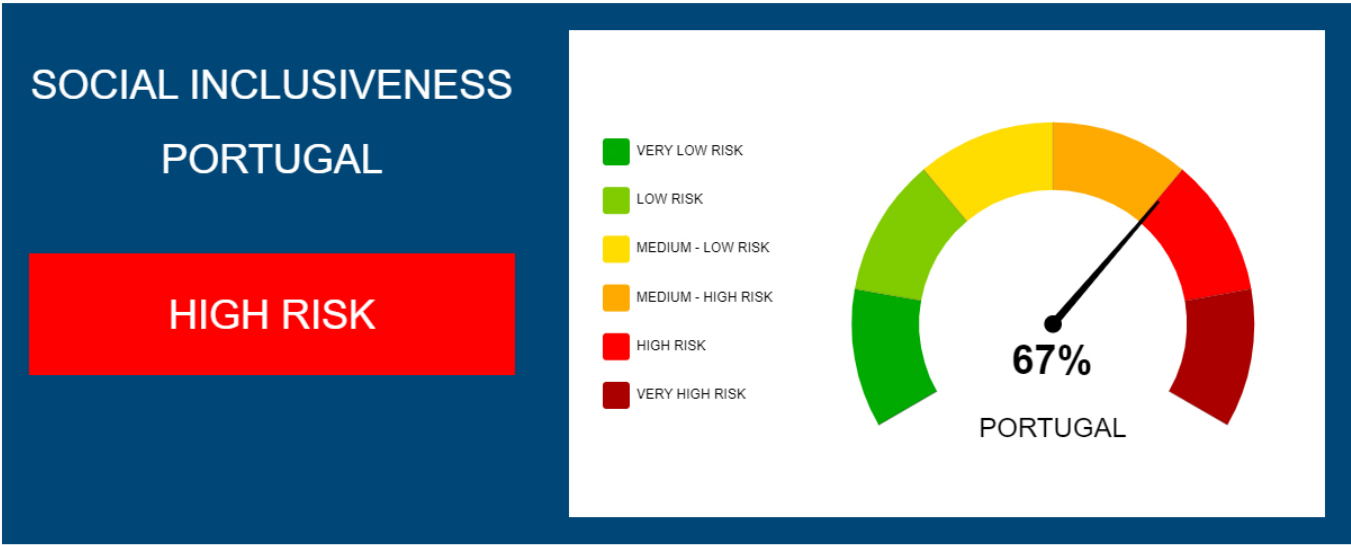
- Portugal experiences a gradual rise in polarization across legacy media and social networks. As the political cycle gets very unstable, leading to anticipated legislative elections (in 2023 and 2025), the media are prominent spaces for political disputes and controversies, eroding trust in responsible and moderate journalism. Most television channels become commentary rather than actual news, distorting public debate. Journalistic organizations and media regulators need to engage in a dialogue to foster ethical consensus regarding such practices.

Recommendations for the Government:

- The ongoing structural crisis, which includes economic, political and cultural dimensions, calls for remediation measures targeting structural objectives. Most media companies show negative results. Predictably, the future will bring more business bankruptcies. Salaries are unattractive, and young people tend to leave the profession early, while stress levels are high across all age groups. The Government must take this matter seriously and develop substantial media policies to protect journalistic jobs and guarantee the population's access to independent and credible information. State support for the media must be allocated based on an editorial mission aligned with independent journalism practised by professional journalists, not hybrid formats supported by sponsored content and political advocacy.
- Political disinformation must be combated more effectively; self-regulation must be adapted to digital threats, including AI-generated disinformation.
- The independence of the public media service needs adequate funding. The planned measure of removing commercial advertising from RTP must be considered and, if it goes ahead, compensated through funding equivalent to the loss of revenue. Like RTP, which saw its mission modernised in the CCSPT review, the news agency Lusa requires less “accounting” and more strategic positioning as one of the pillars of quality independent journalism and forefronts in the fight against news deserts.
- Due to the rise of the extreme right party Chega and the growing contamination between politics and the media, it is crucial to reinforce the monitoring of the communication practices of political parties and other political agents on digital platforms to disseminate disinformation.

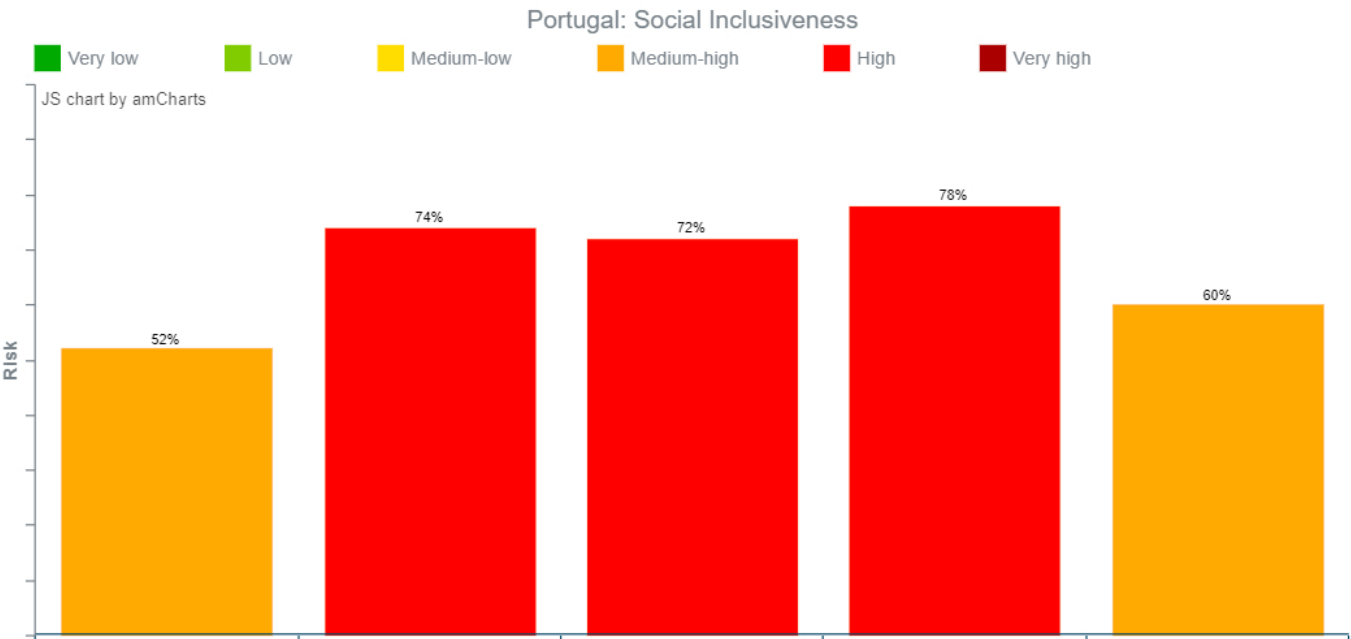
3.4. Social Inclusiveness

The Social Inclusiveness area focuses on the universal, inclusive and safe access to media, especially by specific groups in society: minorities, marginalised communities, local and regional communities, women and people with disabilities. It also examines media literacy environment, as a precondition to inclusiveness.



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The situation of **Social Inclusiveness** has worsened to a high-risk assessment, mainly affected by indicators **Gender Equality in the Media**, **Representation of Minorities in the Media**, and **Local/Regional and Community Media**. Women's top editorial and management leadership is scarce, and gender representation in terms of experts, opinion-makers, sources, and news actors remains unbalanced. Minorities have limited access to television and public and private radio, and its news coverage in 2024 was mainly centred on immigration, crime, housing, health, work conditions and social contributions. Local media companies face worrying viability issues, and local news coverage is declining.



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Universal coverage is guaranteed by RTP, which is public television. The distinctive character of public service content concerning private content is generally guaranteed in the law (article 38 of the Portuguese Republic Constitution) and RTP's concession contract, but in practice, significant ambiguities emerges in this orientation, such as the recent case of a parliamentary majority opposing the intention to remove advertising from RTP (Eco, 2024).

Portugal's regulatory safeguards relating to net neutrality have not been fully implemented. In 2023, the National Communication Authority (ANACOM) ordered the cessation of zero-rating and similar offers because they discriminate, on commercial grounds, between traffic related to zero-rated applications and other traffic (ANACOM, 2023). It is not completely clear that ISPs manage network traffic in a transparent, impartial, and neutral way without discriminating against particular types of content or content from specific sources, as also confirmed by ANACOM in its analysis.

Concerning media accessibility for people with disabilities, there is a well-developed and implemented legal framework concerning media accessibility for people with disabilities for over a decade (including Law n° 27/2007, from 30 July - Law on Television and On-Demand Audiovisual Services, more recently updated by Law no 74/2020, from 19 November; the legal European framing on this matter – Directive 2010/13/EU from the European Parliament and the European Council, from 10 March 2010; or the Decree Law No. 83/2018, where a Portuguese government agency is required to monitor the level of accessibility of the Portuguese public administration websites). In what concerns TV, the first agreements with TV providers concerning the accessibility of media dates to 2005 (addressing initially people with auditory impairments).

The minimal media accessibility plans for 2022-2025 were established by the Media Regulatory Body (ERC, 2021). According to the Media Regulatory Body's Regulation Report regarding 2023 (ERC, 2024a), the main open-signal TV channels offer accessibility for people with hearing impairments and have generally respected their obligations concerning accessibility standards. According to the same report, all channels have also respected their obligations in terms of audio description. However, we can consider the minimal annual accessibility standards concerning audio description very low (for RTP1: 20 hours per trimester; for RTP2: 6 hours per trimester; for private television: 5 hours per trimester).

Issues requiring particular scrutiny:

- **Mobile and fixed broadband access.** The percentage of the population covered by broadband is 91%, representing high risk in comparison to performance of other countries. (Eurostat, 2024). The download speed of fixed-broadband homogeneity coefficient is 5.59 (medium risk), and mobile broadband is 3.84 (high risk) which indicates variability across the ^[1]regions. The share of the population having broadband mobile subscriptions is 85% (high risk) (DESI, 2024).

Most marginalized communities are not represented in PSM or private news reporting. As stated in previous MPM reports, systematic monitoring and reliable statistics on hate speech on the Internet and social media are still lacking. However, the latest ERC Pluralism and Diversity report (2024b) states that the representation of marginalized groups and individuals (refugees, immigrants, social-economical vulnerable groups), either as information sources or as protagonists/news actors, is "residual" in PSM and private channels news reporting. In 2024, news coverage of marginalized groups focused mainly on the following areas: irregular immigration, crime, work, housing and human rights. It is worth noting that security-related issues were given a high profile not only on television but also in newspapers and radio, with the security forces and political parties playing a particularly prominent role. Television and the press have mobilized a considerable number of commentators who have discussed the issue in terms of migration, crime, housing, health, work and social contributions. In the press and on television, there were reports about working conditions and exploitation by mafias of the communities that had recently arrived in Portugal from the Indian peninsula. The killing of a Portuguese citizen of Cape Verdean origin in a neighbourhood on the outskirts of Lisbon by a police officer resulted in riots and great violence in many neighbourhoods inhabited by a Luso-African majority. As subsequent surveys have shown, the coverage of these incidents was exhaustive and contributed to the "perception" of insecurity among Portuguese citizens.

The new wording of paragraphs 1 and 2 of article 240 of the Penal Code, introduced by Law n.º 4/2024 (January 15th 2024), results in a broadening of the conduct to which the crime of discrimination and incitement to hatred and violence applies (which now include, for example, language and gender expression). In addition, the development of "organized propaganda activities" and the "incitement" of discrimination, hatred or violence are no longer required, and it is sufficient for a organization founded or constituted or the propaganda activity developed to "encourage" discrimination, hatred or violence. The change in article 240 of the Penal Code also introduced a new paragraph (paragraph 3), which states that when the crime of discrimination and incitement to hatred and violence is committed using a computer system, the court can order its deletion.

Despite these changes, Article 240's requirements and the difficulty in proving the motivation of hatred make it challenging to apply the criminal offence in practice. There has been an improvement in the fight against hate speech in Portugal, but the initiatives are still limited, lacking a serious joint effort between the government, civil society and universities.

Issues requiring particular scrutiny:

- **The National Plan to Combat Racism and Discrimination 2021-2025 seems on hold**

The Observatory on Racism and Xenophobia, created in 2023, does not demonstrate any sign of relevant activity. The election of the president of the Commission for Equality and against Racial Discrimination (CICDR), now an autonomous entity (only dependent from the Assembly of the Republic) took several months in 2024, which caused several delays in processing racism and discrimination complaints (Observador, 2024). Plus, the National Plan to Combat Racism and Discrimination 2021-2025 had only implemented 16% of its measures at the end of December 2023. No data is available for 2024 (Público,

2025). Previous government members and several associations believe that the execution of this plan stopped in 2024 due to the current Portuguese government's (elected in March 2024) lack of interest and/or political will (Público, 2025).

LOCAL/REGIONAL AND COMMUNITY MEDIA

HIGH RISK

There's no change since last year's report. Portugal is at high risk in matters of local coverage. Local coverage is deteriorating as local media companies face concerning viability and financial issues. More than half of the Portuguese municipalities are news deserts or semi-deserts or are on the verge of becoming so (Jerónimo et al., 2022). According to the report *Local Media for Democracy - Country Focus: Portugal* (Santos Silva et al., 2024), suburban areas are usually misrepresented and associated with crime and poverty in national news media. The Portuguese government's Media Action Plan (announced in 2024) contemplates support for local media, but its implementation strategy and impact are still unknown.

Issues requiring particular scrutiny:

- **Community media.**

Although community media, namely community radios and other web-based projects, seem to exist in practice (Midões, 2023), the absence of a legal definition and framework for community media (ERC, 2023) makes assessing the field and its economic viability/independence challenging.

GENDER EQUALITY IN THE MEDIA

HIGH RISK

Gender equality in the media is the highest-risk indicator within the Social Inclusiveness area. Women clearly lack fair and balanced representation in media coverage, opinion-making, and management boards (ERC, 2024b; Cardoso et al., 2024). There are no women as editor-in-chief in the country's leading news media. The share of women among members of management boards and executives is low, either in PSM or private TV companies. In PSM, the share of women on management boards is 33%; and the share of women among executives is 28%. In what concerns the main TV private companies, the share of women on management boards is 31%; and the share of women among executives is 27%.

Issues requiring particular scrutiny

- **Representation of women.**

There's no change since last year's report. The Media Regulatory Body's Pluralism and Diversity Report in Television for 2023 (ERC, 2024b) reported a noticeable imbalance in gender representation concerning information sources and news actors. There is also an unbalanced presence of women as opinion makers in television, radio broadcasting, and online media (Cardoso et al., 2024).

According to Eurostat (2023), 72% of the population has above basic information and data literacy skills; only 23% have checked the truthfulness of the information or content they found on internet news sites or social media over the past three months. Media literacy is still not included in the compulsory education curriculum. Recent efforts from the Journalists' Union and research projects (e.g. Associação Literacia para os Media e Jornalismo; IBERIFIER; YouNDigital) have however led to the implementation of relevant training programs on media education and digital citizenship for teachers. Media literacy initiatives within non-formal education are very diverse (mainly targeted to children, young and older people), but projects for vulnerable groups need better support to promote long-term strategies. Audiovisual media services (AVMS) and video-sharing (VS) platforms are not active in the field of media literacy.

Issue requiring particular scrutiny:

- **Two pilot projects in media literacy announced in 2024**

The Media Action Plan, presented in 2024 by the current executive, proposes implementing a National Media Education Plan (estimated cost: 600.000€), in order to develop a more solid approach to media literacy. The Media Action Plan also includes two measures to promote media literacy in schools (p. 36): a) a pilot project of specific workshops for schools covered by the Educational Territories of Priority Intervention Programme (TEIP), planned for 2025; b) a “Literacies” pilot project, that consists in the adoption by schools of a mandatory discipline, with 6 modules, two of them mandatory; one of the modules is dedicated exclusively to media literacy. This pilot project has started this school year, in seven schools (Diário de Notícias, 2024).

Recommendations for Social Inclusiveness

Recommendations for the state and regulatory bodies:

- the development, implementation and impact measurement of public policies concerning gender equality and representation of minorities in the media, in order to improve diversity and fairness in media access and representation;
- the entire execution of the measures included in the National Plan to Combat Racism and Discrimination 2021-2025, namely in what concerns developing accessible mechanisms for managing, recording, and reporting online hate speech and incitement to violence, and promoting education, training and awareness-raising on human rights to prevent and combat racial discrimination;
- the promotion of financial viability and support for local media companies, in order to strengthen local news coverage and prevent the expansion of news deserts;
- the implementation and impact assessment of a national media literacy plan, and the inclusion of

media literacy in the compulsory education curriculum;

- the improvement of mobile and fixed-broadband access and download speed in the national territory.

4. EMFA Observatory - Year 1 : Before the implementation

In this section, we are assessing the state of play of the EMFA before its entry into full force, based on specific themes monitored by the MPM questionnaire.

Fundamental Protection
Platforms' moderation of media content
Available data is not sufficient to provide a reliable assessment of content moderation practices of very large online platforms regarding media service providers. Further empirical research is necessary to determine whether content moderation mechanisms align with legal safeguards.
Surveillance of journalists and protection of sources
The Journalists' Statute guarantees the right to professional secrecy and the protection of sources (Law no. 1/99, of 1st January, Article 11). Additionally, the protection of sources is upheld in Article 38 of the Constitution of the Portuguese Republic. Under the Fundamental Law, freedom of the press encompasses "the freedom of expression and creation of journalists," as well as "the right of journalists, under the terms of the law, to access sources of information and to safeguard professional independence and secrecy." In Portugal, there have been no significant developments following the approval of the European Media Freedom Act. Nonetheless, the constitutional text itself (Articles 37 and 38—Freedom of Expression and Information, and Freedom of the Press and Media, respectively) offers safeguards against intrusive surveillance of journalists.
National Regulatory Authorities
Article 7(3) of the EMFA stipulates that "Member States shall ensure that the national regulatory authorities or bodies have adequate financial, human and technical resources to carry out their tasks under this Regulation." This represents a particularly delicate challenge in Portugal, where there is an urgent need to improve the role and action of the regulator. This means that financial resources need to be more stable, regular, and robust, so that the ERC can also better respond to the challenges of the present with expanded technical and human teams, particularly to take on in-depth investigation cases, which are unusual in the practice of the media regulatory authority

Market Plurality
Transparency of media ownership
The General Media Transparency Law (n. 78/2015) already states that media companies are required to disclose their ownership structures and other stakeholders' interests. This law is under revision in 2025 to increase its efficacy. The media authority (ERC) is participating in this revision.

Media market concentrations

The media authority typically analyses the market transactions that generate more concentration, on a case-by-case basis. ERC has not released any specific guidelines that they follow in this kind of assessment. However, many case studies show that ERC essentially follows the laws and regulations that can be applied to specific media. This means a somewhat limited intervention in cross-media or digital media operations. In terms of compliance with art. 22, at this stage, we are not aware of any changes to the law, but a legislative review is underway.

Editorial independence (economic)

The Portuguese Constitution and Laws enshrine freedom of the press, which results in the special protection of journalists' rights, both vis-à-vis the state or third parties and within the media organisation. It is a journalist's fundamental duty to repudiate censorship or other illegitimate forms of limitation of freedom of expression and the right to inform, as well as to publicise conduct that undermines the exercise of these rights. Management or leadership positions in the information must be exercised with editorial autonomy, and the radio or television operator is prohibited from interfering in the production of information content. But we can't fully be guaranteed that this works in practice, especially at a time when journalism in Portugal is going through a very serious crisis.

Political Independence

Editorial independence (political)

The Press Law, the Journalist Statute and the Constitution of the Portuguese Republic enshrine the principle of editorial autonomy for public and private media. The Journalist Statute (Law No. 1/99) regulates the fundamental rights of journalists, namely: a) Freedom of expression and creation; b) Freedom of access to sources of information; c) Guarantee of professional secrecy; d) Guarantee of independence; e) Participation in the management of the respective news organization. Article 11º, on professional secrecy, stipulates that "material used by journalists in the exercise of their profession may only be seized during searches of media organizations through a court order, in cases where the breach of professional secrecy is legally admissible". Article 12º safeguards the independence and the conscience clause: "Journalists may not be forced to express or subscribe to opinions or to refrain from doing so, or to perform professional tasks contrary to their conscience, nor may they be subject to disciplinary measures due to such acts". Law 53/2005 gives ERC the power to issue a prior and binding opinion on the appointment and dismissal of directors and directors of media outlets belonging to the state and other public entities in charge of programming and information (Article 24º)

State advertising

The measures in this article already exist in Portuguese legislation. Information on state advertising expenditure is already public, including the total annual amount and the amount per outlet. ERC monitors compliance with the obligations set out in Law 95/2015, on state institutional advertising campaigns and, in particular, the application of the percentage to be allocated to local and regional

media. Entities promoting state institutional advertising campaigns must notify the ERC, via the Digital Platform for State Institutional Advertising, of the acquisition of advertising space, and monthly reports are published on the distribution of campaigns by media.

Independence of Public Service Media

PSM financing requires extra care. The review of the Public Service Concession Contract demands more from RTP without increasing the CAV, and lack of funding can compromise independence. EMFA brings new assurances that PSM are equipped with adequate and stable funding for future operations, under their public service mission. Lusa remains dependent on the State Budget for annual transfers of the compensatory indemnity and awaits clarification of the governance model within the framework of a 100% public company. Faced with a change in Lusa's operating models, the guarantees provided by the EMFA are crucial to ensure that its managers and board members will be selected through transparent and non-discriminatory procedures for sufficiently long terms. The existence and functioning of new social and supervisory bodies at Lusa presuppose a structural reform of the governance model, which is under study and awaits implementation.

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Interviews – Social Inclusiveness

Carlos Duarte, associate professor at Faculdade de Ciências da Universidade de Lisboa and accessibility expert.

Isabel Férin, associate professor at Universidade de Coimbra and expert on the relationship between media and ethnic minorities.

6. Notes

- [1] Speedtest by Ookla Global Fixed and Mobile Network Performance Maps was accessed on 13 January 2025 from <https://registry.opendata.aws/speedtest-global-performance>. Speedtest® by Ookla® Global Fixed and Mobile Network Performance Maps. Based on analysis by Ookla of Speedtest Intelligence® data for 1 January- 31 December 2024. Provided by Ookla and accessed 13 January 2025. Ookla trademarks used under license and reprinted with permission.
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7. MPM Methodology

The Media Pluralism Monitor (MPM) is a research tool that is designed to identify potential risks to media pluralism in the Member States of the European Union and in Candidate Countries. It consists of a questionnaire of 200 variables divided into four main thematic areas - Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness - and 20 indicators. (see Table 1).

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Universal and inclusive access to the media
Protection of information integrity	Plurality of media providers	Editorial autonomy	Representation of minorities in the media
Protection of right to information	Plurality in digital markets	Integrity of political information during elections	Local/regional and community media
Journalistic profession, standards and protection	Media viability	State regulation of resources and support to the media sector	Gender equality in the media
Independence and effectiveness of the national regulatory authorities	Editorial independence from commercial and owners' influence	Independence of PSM	Media Literacy

Table 1: Areas and Indicators of the Media Pluralism Monitor

The results for each thematic area and Indicator are presented on a scale from 0 to 100% and six-tier system: (1) Very low risk (Rounded score comprised between 0 % and 16% included), (2) Low risk (Rounded score comprised between 17% and 33% included), (3) Medium-low risk (Rounded score comprised between 34 % and 50% included), (4) Medium-high risk (Rounded score comprised between 51% and 66% included), (5) High risk (Rounded score comprised between 67% and 83% included), (6) Very high risk (Rounded score comprised between 84% and 100% included). With regard to the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

To carry out the national data collection, the CMPF partners with experienced, independent national researchers (See Annexe I). These answer and score the variables contained in the questionnaire developed by the CMPF and author the narrative reports. The CMPF staff reviews the work of the national experts at each stage of the implementation of the MPM, including the data collection and the national report. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2024. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This year a part of the MPM has also been implemented in Bosnia and Herzegovina and Moldova. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at

<http://cmpf.eui.eu/media-pluralism-monitor/>.

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2025 CT Leader
<i>Francisco Rui</i>	<i>Cádima</i>	<i>Coordinator of ICNOVA Diversity and Pluralism Observatory</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	X
<i>Marisa</i>	<i>Torres da Silva</i>	<i>Researcher; Professor at DCC-NOVA FCSH</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	
<i>Luís</i>	<i>Oliveira Martins</i>	<i>Researcher; Professor and Coordinator of the Communication Sciences Department (NOVA FCSH)</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	
<i>Carla</i>	<i>Baptista</i>	<i>Researcher; Professor at DCC-NOVA FCSH</i>	<i>ICNOVA - Nova Institute of Communication (FCSH - Universidade Nova de Lisboa)</i>	

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
<i>Elsa</i>	<i>Costa e Silva</i>	<i>Researcher; Professor at UMinho</i>	<i>CECS - Communication and Society Research Centre</i>
<i>Paulo</i>	<i>Faustino</i>	<i>Academic/NGO researchers on social/political/cultural issues related to the medi</i>	<i>University of Porto</i>
<i>Catarina</i>	<i>Burnay</i>	<i>Researcher; Professor at UCP</i>	<i>CECC - Research Centre for Communication and Culture</i>
<i>João</i>	<i>Palmeiro</i>	<i>Former President of the Portuguese Press Association (API)</i>	<i>API</i>
<i>Pedro Jorge</i>	<i>Braumann</i>	<i>Member of the Board</i>	<i>CPMCS - CONFEDERAÇÃO PORTUGUESA DE MEIOS DE COMUNICAÇÃO SOCIAL</i>
<i>Carla</i>	<i>Martins</i>	<i>Member of ERC Regulatory Council</i>	<i>ERC</i>
<i>Sofia</i>	<i>Branco</i>	<i>Internship and professional training coordinator</i>	<i>LUSA</i>

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