

# MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

## APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2022

Country report: Turkey

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**Research Project Report**

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# 1. About the project

## 1.1. Overview of the Project

*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. This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2022. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.*

## 1.2. Methodological notes

### Authorship and Review

*The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.*

*In Turkey the CMPF partnered with Yasemin Inceoglu, Tirse Erbaysal Filibeli, Can Ertuna and Yagmur Cenberli (Bahcesehir University), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annex II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.*

*Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).*

<b>Fundamental Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

### The Digital Dimension

*The Monitor does not consider the digital dimension to be an isolated area but, rather, as being intertwined with the traditional media and the existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digitally specific risk scores, and the report contains a specific analysis of the risks that related to the digital news environment.*

## **The Calculation of Risk**

*The results for each thematic area and Indicator are presented on a scale from 0 to 100%.*

*Scores between 0% and 33%: low risk*

*Scores between 34% and 66%: medium risk*

*Scores between 67% and 100%: high risk*

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.

## **Methodological Changes**

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. For the MPM 2023, no major changes were made to the questionnaire, except for the Indicators Transparency of Media Ownership, Plurality in Digital Markets and Editorial Independence from Commercial and Owners Influence (Market Plurality area), and Protection Against Disinformation and Hate Speech (Social Inclusiveness area). 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/>.

In the Market Plurality area, the names of three Indicators have changed. The former indicator on "News Media Concentration" is now named "Plurality of Media Providers"; "Online Platforms and Competition Enforcement" has been renamed as "Plurality in Digital Markets"; "Commercial & Owners' Influence Over Editorial Content" has been renamed as "Editorial Independence from Commercial and Owner Influence".

**Disclaimer:** The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2023 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2023, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

## 2. Introduction

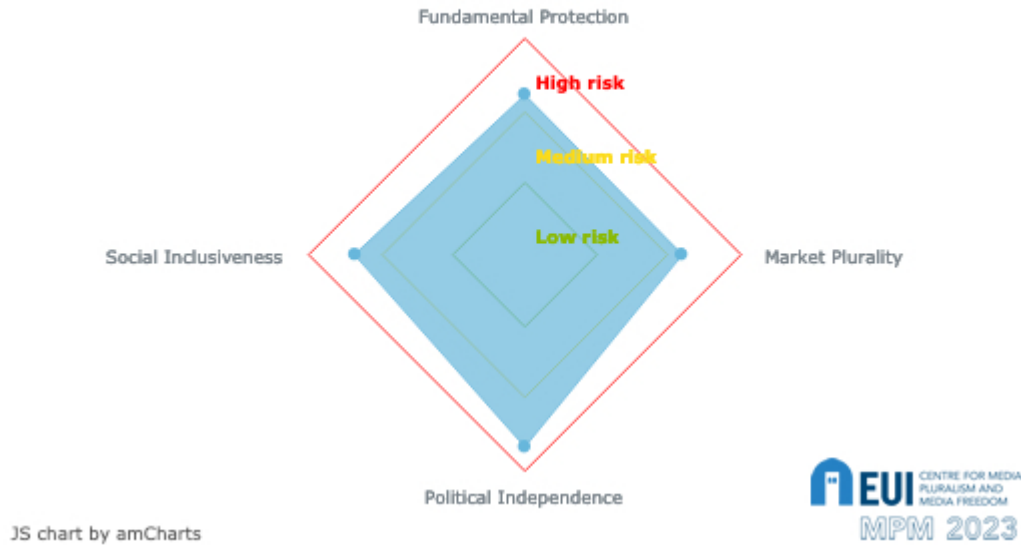
- **Country overview:** Turkey is situated at the crossroads of the Balkans, Caucasus, Middle East, and the Eastern Mediterranean. The country has a population of 85,279,553 as of March 20, 2022 (TÜİK, 2022).
- **Languages:** The official language is Turkish.
- **Minorities:** No exact data is available concerning the different ethnic groups in Turkey. The last census data dates from 1965. Under the Treaty of Lausanne, the Republic of Turkey recognizes Armenians, Greeks, and Jews as ethnic minorities. The Kurds (between 12-20 million), the largest minority in Turkey, and other minorities such as Alevis (almost 15 million) (Baskin Oran 2018), which is the largest religious minority in Turkey, have not been recognized as minorities according to Turkish Law and regulations. After the Syrian Civil War started in 2011, the population of Syrian refugees has grown day by day. According to UNHCR's data (2021), the number of registered Syrian refugees in Turkey is almost four million.
- **Economic situation:** Despite 5.6% growth in GDP (TÜİK, 2023) with support provided through the banking sector, the imbalances and risks such as domestic inflation, currency depreciation, and loss of external reserves increase. According to the Presidency of Strategy and Budget, the annual inflation rate is 64.26%, and the exchange rate increased by 38% for US dollars and 29% for Euro in 2022 (Habertürk, 2023). Consequently, the poverty rate increased by 98.41% in 2022 in comparison to the rate in 2021 (Turk-Is, 2022). The net minimum wage was determined as 5.500₺ per month (approx. 276€) by the government, however the poverty threshold for a family of four reached to 26.485₺ per month (approx. 1.330€) in 2022 (Turk-Is, 2022).
- **Political situation:** Turkey obtained the status of European Union candidate in 1999, and accession negotiations started in October 2005. Since 2018, Turkey's accession negotiations have effectively come to a standstill. Following the coup attempt in 2016, Turkey had been ruled under a state of emergency by decrees for two years. During this period, on 16 April 2017, Turkey's constitutional referendum was held, and the amendments that would transform the country from a parliamentary democracy into a presidential system were accepted. With the power centralized at the level of the Presidency without effective checks and balances, the independence of the judiciary is systemically eliminated. In February 2022, the Council of Europe started the infringement procedure in Turkey for the non-implementation of the judgment in the Kavala case. In the "Key findings of the 2022 Report on Türkiye" it was stated that "the serious backsliding observed in recent years continued. ... Restrictive measures implemented by state institutions and increasing pressure with judicial and administrative means continued to undermine the exercise of freedom of expression."
- **Media market:** Censorship and self-censorship are very widespread in the media. Most majority of the mainstream media are affiliated with the government. After the change in the management structure in 2021, the board members of TRT (public service media of Turkey) are elected from persons who are affiliated with the ruling party, and the appointments are under the direct control of the Presidency. The 2022 Report of European Commission's Progress Report demonstrates no improvement as in the previous year. The report states that "the public service broadcaster Turkish Radio and Television Corporation (TRT) is affiliated with the Presidential Communication Authority, and the Radio and Television Supreme Council (RTÜK) with the Ministry of Culture and Tourism. There were no changes

to TRT's editorial policy which reflects the government's official lines." After the bomb attack on Istiklal Street in Istanbul, wide-scale internet bandwidth throttling was applied on social media platforms through internet service providers on November 13, 2022. Website services were restored after nearly 10 hours of restriction. According to the Journalists' Union of Turkey (TGS), there were 44 journalists in prison by the end of 2022. Between 2002 and 2022 almost 90% of the local-regional TV stations, 70% of the local-regional radio stations, and 900 national or local newspapers were shut down according to a report presented by an oppositional PM.

- **Regulatory environment:** The vast majority of the members of the Radio and Television Supreme Council (RTÜK) are also appointed by the ruling party Justice and Development Party (AKP) and its ally, the Nationalist Movement Party (MHP), which jeopardizes the independence of the regulatory mechanism. Freedom on the Net defines internet freedom in Turkey as "not free" (Freedom House, Freedom on the Net 2022). The amendment to Law No. 5651 (known as social media law-2020) and the amendment to Law No. 5187 (known as disinformation law) pose serious threats to freedom of expression and freedom of the press. With this disinformation law a new crime is added to the Turkish Criminal Code under the title of "publicly spreading information that is misleading people" with which the scope of the provision was left ambiguous and creating concern, fear or panic among people is regarded as a crime. Disrupting the country's internal and external security, public order, public health or domestic peace is also defined as a crime. Anyone disseminating false information in this manner is subject to be punished with imprisonment of 1 to 3 years. According to figures announced by RTÜK member İlhan Taşcı, RTÜK imposed a total of 54 penalties on opposition broadcasters in 2022 while not imposing any penalties on most of the pro-government TV channels.

### 3. Results of the data collection: Assessment of the risks to media pluralism

Turkey: Media Pluralism Risk Areas



The **Fundamental Protection** area scores a high risk (74%). The indicators on **Protection of freedom of expression** and **Protection of right to information** are classified as high risk (83% and 88%, respectively) in 2022. Turkey has continued to be one of the leading jailers of journalists, and the structure and motives behind the murder of a local journalist remained unclear despite the trial, according to his family and lawyers. The enactment of a bill under which a crime as “publicly disseminating false information” is defined further narrowed the space for freedom of expression. The Radio Television Supreme Council (RTÜK) and the Press Advertising Council were instrumentalized in punishing critical and independent media outlets. At the same time, the Turkish web pages of two prominent international news providers, Deutsche Welle and Voice of America, were subject to access bans just like many other websites where the blocking of access to various websites and removal of news stories about corruption, fraud, bribery, and violence-related issues after easily obtained court rulings has continued to be the tool of limiting free speech, and the main target was news stories. Further, restricting access to major social media platforms and internet throttling has become a common censorship policy after major events like terror attacks, even after the earthquake on February 6, 2023.

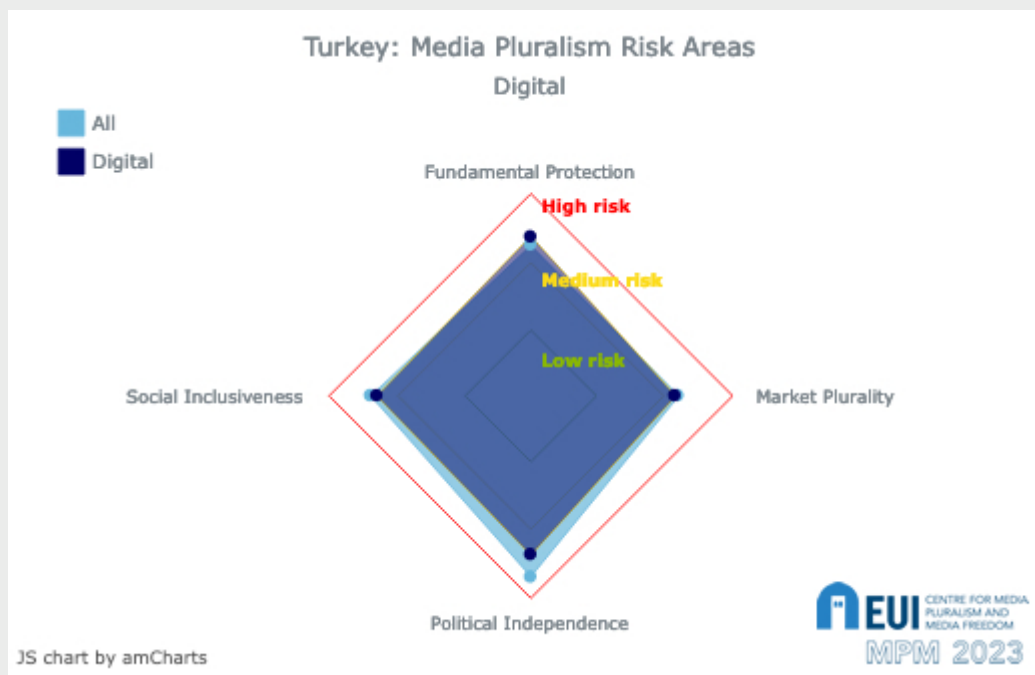
The **Market Plurality** area scores a high risk (73%). In spite of the result that the indicator on **Transparency of media ownership** is evaluated as medium risk, the indicators on **Plurality of media providers**, **Plurality in digital markets**, **Media viability** and **Editorial independence from commercial and owners influence** score high risk. In the face of increasing inflation and continuing economic crisis, print, local and digital media struggle to survive. The regulatory bodies, Radio Television Supreme Council and Press Advertisement Agency, continue to use their authority as a censorship mechanism, which has negative financial consequences on the oppositional and independent media outlets. The ownership structure in the mainstream media outlets remains the same as the year 2021 in which pro-governmental discourse finds a high ground due to their owners’ seek to preserve close relations with the ruling elite. Most majority of the media in Turkey are owned by the corporate entities (Demirören, Doğuş, Ciner, Albayrak, Kalyon, İhlas) whose owners are in close ties with the ruling party AKP and President Recep Tayyip Erdoğan due to their businesses in other sectors such as construction, energy, mining and tourism (Media Ownership Monitor Turkey, 2021).



The **Political Independence** has the highest risk score with 89% among all the areas. Within this area the indicator on **Editorial Autonomy** scores the highest risk with 97% respectively followed by **Independence of public service media** with 92%, **Political independence of the media** with 90%, **Audio visual media, online platforms and elections** with 85% and **State regulation of resources and support to the media sector** with 83%. The pro-governmental editorial policy of TRT (PSM of Turkey) and the President's direct control over Anadolu Agency (state-run news agency) as well as TRT remains the same as in the previous year. The systematic punishments of the regulatory bodies (Radio Television Supreme Council and Press Advertisement Agency) serve to strangle the autonomy and the independence of the oppositional and independent news media.

The **Social Inclusiveness** area scores a high risk (79%). The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women, and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against illegal and harmful speech. In 2022, there has been no positive change in laws, regulations, or state policies related to the Social Inclusiveness area. However, due to revisions in some sub-indicators, particularly in Media Literacy and Protection against disinformation and hate speech, the risk percentage has decreased.

### Focus on the digital environment



The digital risk score for the **Fundamental Protection** area is 78.6%, high risk. Even though Turkey's ranking on the RSF's World Press Freedom Index for 2022 has increased by four places, going from 153rd to 149th position, the detention of journalists still remains a significant danger to the liberty of speech.

The digital risk score for the **Market Plurality** area is 71.5%, high risk. Current laws and regulations do not control or monitor the cross-ownership and concentration in digital media. The top 4 online players in terms of audience share are Alphabet, Twitter, Meta, and Trendyol. According to Revenue Models of Digital Newsrooms, the main revenue in digital news organizations is subscription,

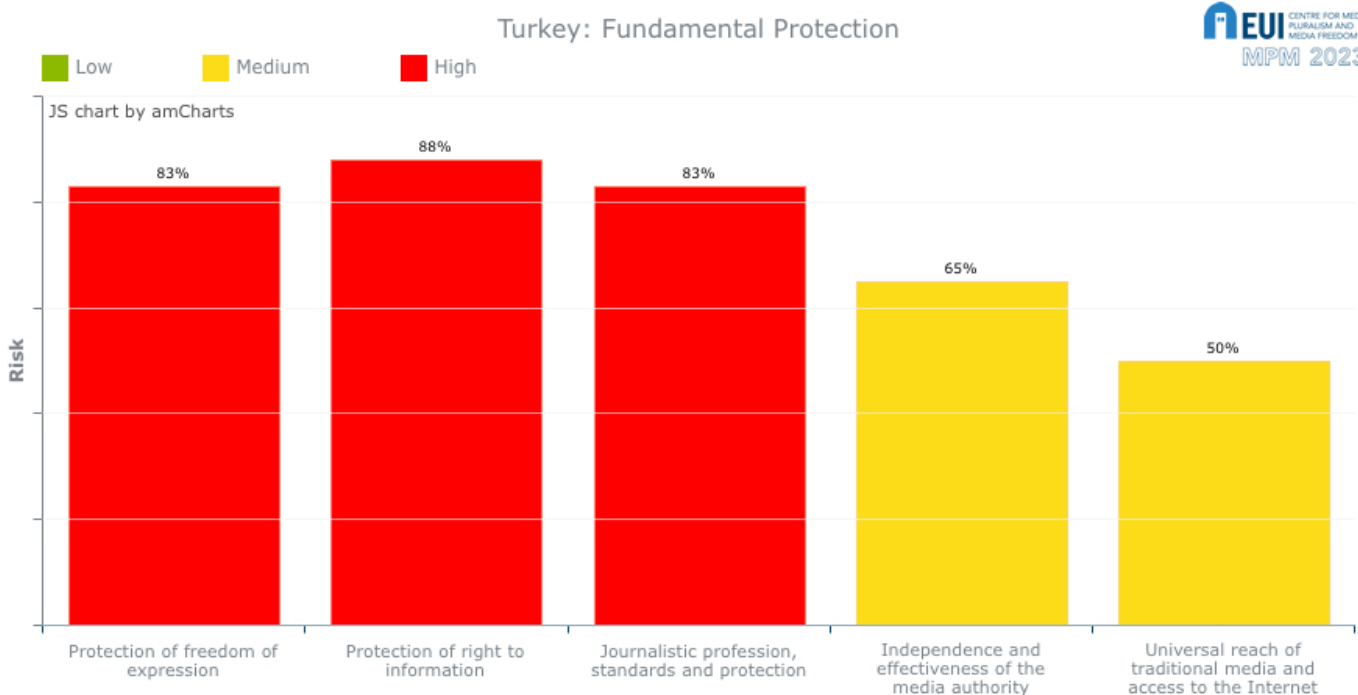
crowdfunding, and grant programs other than advertising.

The digital risk score for the **Political Independence** area is 78, high risk. The online environment is mostly left unregulated in terms of guaranteeing political independence. Current laws and regulations are either ineffective or do not exist to ensure transparency of online political advertising and its spending during electoral campaigns in Turkey. Consequently, the online public service mission of TRT (PSM of Turkey) is not regulated as well.

The digital risk score for the **Social Inclusiveness** area is 76%, high risk. The government released an amendment to the Press Law No. 5187 on October 18, 2022, which has become known as the "disinformation law" among the public. The amendment contains several articles that have generated debate, particularly those aimed at controlling digital media's online advertising. However, there is no precise explanation of what constitutes disinformation or hate speech in the law, leaving it open to interpretation by the government.

### 3.1. Fundamental Protection (74% - high risk)

The Fundamental Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have the competence to regulate the media sector, and the reach of traditional media and access to the Internet.



The **Fundamental Protection** area is associated with a high risk (74%).

The indicator on the **Protection of freedom of expression** still scores a high risk (83%). This indicator was measured at 87% in 2021. This slight decrease is due to some administrative court decisions suspending the blackout and monetary punishments by regulatory bodies. Although Turkey improved by four places in the World Press Freedom Index of RSF (2022) from 153rd to 149th place last year, the imprisonment of journalists has been a major threat to the freedom of expression. According to the Journalists' Union of Turkey (TGS) (2023), there were 44 journalists in prison by the end of 2022. GÜNGÖR Arslan, a journalist from the city of Kocaeli, was murdered in an armed attack in February 2022. The prosecutor claimed that Arslan was killed because of his critical articles about the former leader of an ultra-nationalist group. According to the RSF Index in Turkey, in which 90% of the national media is under government control, discriminatory practices against critical journalists and media outlets, such as stripping them of press passes, became commonplace, and the judges who do the government's bidding had been trying to limit democratic debate by censoring online articles tackling corruption and similarly sensitive topics. According to 2022 figures announced by RTÜK Radio Television Supreme Council Member İlhan Taşçı, the Council mainly fined opposition channels imposing a total of 54 penalties on opposition broadcasters, whereas pro-government TV channels were fined four times throughout the year. Further, the Press Advertisement Agency continued to impose many bans on critical newspapers. Social media platforms were restricted for 10 hours on November 13 2022, following a deadly explosion on Istiklal Street in Taksim, Istanbul. Further, two days after the devastating earthquakes in southern Turkey, on February 8, 2023, Twitter was restricted on multiple internet providers, according to Netblocks data (2023).

The indicator on the **Protection of the right to information** scores a high risk (88%). According to a

Freedom House report (2022), although there is access to information law, in practice, the government lacks transparency and arbitrarily withholds information on the activities of state officials and institutions. External monitors like civil society groups and independent journalists are subject to arrest and prosecution if they attempt to expose government wrongdoing. The broad and vague definition of state secret has been handled in limiting freedom of expression. According to a report by the independent T24 news website (2022), in 2022, the ministers of the cabinet were presented with 20,502 questions by the members of the parliament and 8,423 of them were not answered, and 7,192 of them were answered late. In most cases, replies were not considered satisfactory. Further, Turkish Law does not prescribe any specific rules or protection for whistleblowers. Although OECD Phase 3 report raised concern over the lack of legislation on the protection of whistleblowers in 2017, Turkey has not yet amended its legislation yet.

The indicator on the **Journalistic profession, standards, and protection** also scores a high risk (83%). According to the Press Freedom Report of the Journalists' Union of Turkey (2022), between January 2021 and April 2022, 57 journalists were physically attacked, and in 19 of these attacks, a weapon was used. One Journalist, GÜNGÖR Arslan from SES Kocaeli Newspaper, was killed because of his journalistic activity. He was the last journalist to be killed. In the last 113 years, 67 journalists have been killed in Turkey. Women journalists are not immune from threats and attacks either. According to the Coalition for Women in Journalism data reported by Bianet (2022a), in the first five months of 2022, 63 women journalists were targeted by legal cases, attacked, or threatened. According to the Mapping Media Freedom monitoring report, there have been many cases in which women journalists were attacked and/or harassed by the police while they were taken into custody or doing their job in the field. According to the data from the Turkish Statistical Institution, as reported by the Turkish Journalists' Union (2022), the unemployment rate of journalists is 18.3%, more than 6% higher than the general unemployment rate. According to the same report, there are 23,907 officially registered journalists in the country. 68,72% of the journalists have official press cards. Many journalists are rejected or kept on the waiting list by the Directorate of Communication of the Presidency. The same institution also cancels many journalists' press cards without citing a legal reason. However, many media owners also do not register their employees to the social security system to be covered by Press Law No. 5953, which puts a heavier financial burden on them. Freelancers and self-employed journalists are out of the scope of the Press Labour Law in Turkey. They cannot be a member of the unions and have an officially recognized press card since they do not have a regular income and insurance.

The indicator on the **Independence and effectiveness of the media authority** scores a medium risk (65%). This sub-indicator registered a decrease of 5 percentage points in the risk factor this year. This is due to the Constitutional Court ruling regarding access blocks of some news pages by referring that these blocks violated the freedom of expression and press. However, at the time of writing, no major amendment was made by the Parliament, and access blocks targeting news websites continued. It should be noted that since the media authorities demonstrate effectiveness in regulating the media sector, they are not independent at all. Therefore, with current measurement scales, the actual situation in Turkey can not be demonstrated. The law clearly attributes sanctioning powers to the authority. However, it appears that the Radio Television Supreme Council (RTÜK) acts as a government tool to threaten news outlets critical of the government and silence the critical, independent media in Turkey through its punishments. The independence and neutrality of the Supreme Council have been problematic for a long time due to, first and foremost, its election process. The number of nominees depends on the number of seats of political parties in the Parliament. In accordance with the alliance between AKP and conservative nationalist MHP in the elections and the Parliament, the members of these two parties in RTUK act in concert and are able to shape all the decisions with a majority vote. According to Bia media monitoring reports (2023), in the first

nine months of 2022, RTUK issued a total of 101 administrative monetary fines on TV outlets amounting to 22.640.000 Turkish Liras (1,2 million USD). Most of these fines were imposed on channels known for their critical stances, such as Halk TV, Tele 1, KRT, and Fox TV. Broadcast bans for certain programs were also applied. Similarly, the Press Advertising Council (BIK) uses the allocation of state advertising to put financial pressure on critical/independent newspapers. According to Turkish Journalists' Union Annual Press Freedom Report (2022), BIK imposed a total of 25 days of public advertisement bans on newspapers known for their critical stance from April 2021 to April 2022. Cumhuriyet Newspaper was banned for 16 days, Evrensel Newspaper for five days, and Sözcü Newspaper for four days by the Council. Further, RTUK gave 72 hours to international news sites to apply for a license in February, and upon the request of the Council, the Ankara 1st Penal Judgeship of Peace imposed an access block on Deutsche Welle and Voice of America (VOA), which hadn't applied for a license on the grounds that it would pave the way for censorship.

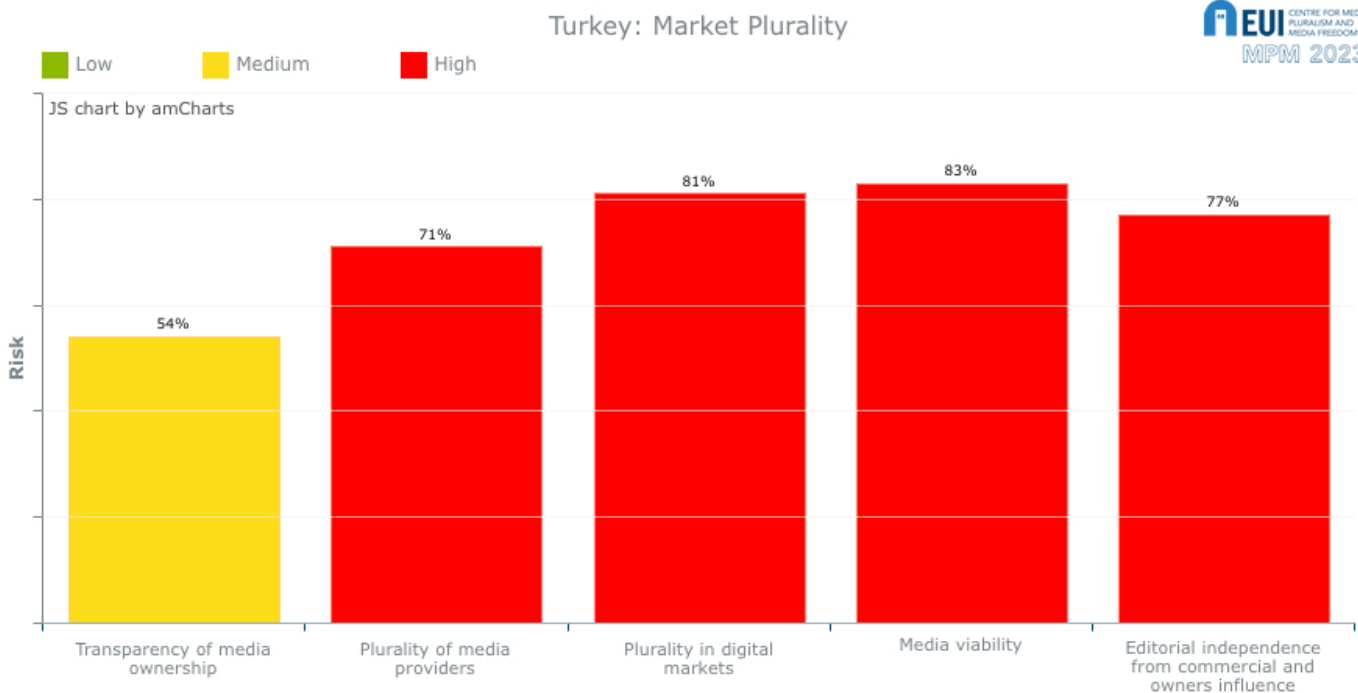
The indicator on the **Universal reach of traditional media and access to the internet** scores medium risk (50%). Last year the indicator scored a high risk (72%). The improvement is due to an increase in the Internet speed and decreased concentration of the top four internet service providers (ISPs). When the coverage of public sector media and Internet coverage is concerned, the vast majority of society has access to these basic services. With its 19 TV Channels, 19 different radio stations and 7 digital channels TRT (Turkish Radio and Television) is the most widely available public service media (PSM) in Turkey. However, it should be noted that the PSM is instrumentalized as a tool for government propaganda rather than providing citizens with pluralistic choices. There is no officially announced percentage data of broadband subscriptions. By 2022, the number of broadband subscribers is 88,847,744 according to Information and Communication Technologies Authority (BTK). However, according to the data gathered from Ookla, Speedtest research Turkey is 66<sup>th</sup> among 141 countries in Internet connection speed.

### **Focus on the digital environment**

In 2022, the bill for the purported purpose of “combating disinformation online” was eventually enacted and put into effect, which has become a serious concern because of article e 29 of the 40-article law, under which “publicly disseminating false information” is defined as a punishable offence which would even require a prison sentence. Further, although Turkey does not have a clear stance on net neutrality, recently journalists from an independent news website Medyascope (2022) revealed that users’ location data and more are sent to the Information Technologies and Communications Authority (BTK) of the Ministry of Transport and Infrastructure every hour. According to the 15-page documents obtained by Medyascope, dated December 15, 2020, the BTK requested internet service providers to send internet traffic records of all users to it hourly. The data is to be sent to the institution with the name and surname of the user, not anonymously.

### 3.2. Market Plurality (73% - high risk)

The Market Plurality area considers the economic dimension of media pluralism, assessing the risks deriving from insufficient transparency in media ownership, the concentration of the market in terms of both production and distribution, the sustainability of media content production, and the influence of commercial interests and ownership on editorial content. The actors included in the assessment are media content providers, with indicators including Transparency of media ownership, Plurality of media providers, Media viability, Editorial independence from commercial and ownership influence, and digital intermediaries (with the indicator on Plurality in digital markets).



The **Market Plurality** area is associated with a high risk (73%).

The indicator on **Transparency of media ownership** scores a medium risk (54%). In the previous report this indicator scored high risk (72%). The decrease is due to the output of some journalistic works demonstrating the ownership structure of various outlets by using the open source information available in official documents such as Trade Registry Gazette. Although there are various obligations for the media service providers to notify authorities with the information on the names and surnames of the shareholders and their shareholding structure for every change in the ownership structure, the law does not oblige them to publish their ownership structure on their website, etc. In addition to that, current law does not hold financial reporting as an obligation and there are no media-specific rules on the disclosure of financial information to the competent authorities by digital native media sector. Further, no ownership and/or sometimes even editorial information is available for some very popular social media accounts and the websites affiliated with them. For the monitoring of ownership, Trade Registry Gazette can be accessed. However, many of the media outlets have companies as their only shareholder so for the disclosure of the name of the individual owner, it might be necessary to go through a number of interrelated companies in the trade registry and this further complicates the process.

The indicator on **Plurality of media providers** scores a high risk (71%). The concentration of ownership is regulated by the Law No. 6112 Establishment of Radio and Television Enterprises and Their Media Services, which only oversees the audiovisual media. The rest of the media sector, including digital native news organizations, is subject to threats such as concentration and monopolization. On top of this legal loophole, the Radio Television Supreme Council's (RTÜK) extended authority over digital media in terms of

licensing and authorization to broadcast online is far from aiming to prevent monopolization, instead, this extended power acts as a censorship mechanism. The online access ban enforced on DW Türkçe and Voice of America Turkey by RTÜK on the grounds of the lack of licensing has been interpreted as blow to the freedom of the press (Euronews, 2022). The traditional news media organizations still hold the top 4 players list and no digital native news organization was able to enter the list (Media Ownership Monitor, 2021).

The indicator on **Plurality in digital markets** scores a high risk (81%). As stated above, the current laws and regulations do not guarantee to prevent ownership concentration despite an acceleration in the digital media environment. However, the new regulation from the Ministry of Trade that became, effective since the last days of December 2022, aims to regulate online advertising and promotion activity by the e-commerce service providers and e-commerce platform service providers. However, the broad definition of advertising, which - in this regulation - includes donations and sponsorships, is interpreted as an attempt to reduce the source of revenue of the media industry. Therefore, it is estimated that the firms and companies may reduce the budgets allocated to the sponsorships and donations and also might move their operations outside of Turkey (Gazete Duvar, 2022 & Habertürk, 2022). Besides, the effectiveness of the Digital Services Tax is still unclear. In spite of the complicated law and regulations, three of the top 4 online players are social media giants (Alphabet, Twitter, and Meta) and the fourth one is Trendyol, the biggest online shopping platform (Digital 2023: Turkey).

The indicator on **Media viability** has the highest risk score (83%) in the market plurality area. As the growth rate continues to increase for the audiovisual sector, newspapers continue to suffer from revenue loss (Reklamcılar Derneği, 2022). Although there is no specific data for digital native and local media, some innovative efforts and civil society support stand out. When it comes to innovative journalistic products in digital native news media, organizations such as Kapsül and Aposto come forward, which are daily email news bulletins. Kapsül is free and accepts donations via Patreon whereas Aposto has some premium content that requires a paid subscription. However, local media continues to struggle to survive. Between 2002 and 2022 90% of the local-regional TV stations, 70% of the local-regional radio stations, and 900 national or local newspapers were shut down (Cumhuriyet, 2023). On the other hand, there are a few local digital-born news outlets located in the eastern and southeastern regions of Turkey such as Serhat News, Munzur Press and Podcast Kurdi which aim to improve the reach of the Kurdish media. Their business models are based on short-term grants, which create a precarious situation for their sustainability (Balı, 2023). Nonetheless, precarity stands as the definitive condition not only for local journalists but also for freelancers. A new initiative called Freelance Journalist Network (Serbest Gazeteci Ağı) and a project executed by the Turkish Journalist Association and Media4Democracy aim to tackle the precarious working conditions. Due to these civil society efforts and the digital initiatives in the eastern and southeastern regions, the risk score of the Media viability indicator decreased by five percentage points compared to the previous year's results. On the other hand, despite that there is no direct state subsidy for either traditional mainstream or independent media, Press Advertisement Agency (Basın İlan Kurumu – BİK) serves as a financial support mechanism that mediates the publication of official announcements and advertisements of public institutions in newspapers and magazines. However, the Agency continues to act as an indirect instrument to punish independent newspapers such as Cumhuriyet, Sözcü, BirGün, and Evrensel by imposing advertising bans. This act of BİK creates an environment where pro-governmental media outlets continuously generate revenue from public ads whilst oppositional/independent news outlets are barred from receiving those revenues (BirGün, 2022).

The indicator on **Editorial independence from commercial and owner influence** scores a high risk

(77%). While current law and regulations (Labor Law No. 5953 on Relationship Between Journalists and Their Employers) grant journalists to terminate their contract and collect their severance in case of changes of ownership or editorial policy, they fail to guarantee editorial independence and journalistic autonomy. Despite “The Journalists Declaration of Rights and Responsibilities” by the Turkish Journalists’ Association making clear distinctions on journalism, advertising, commercial bias, and influences, self-regulatory mechanisms are ineffective in Turkey. A recent academic study demonstrates that “business owners are buying media outlets to spread government propaganda in return for stronger relations with the president, the traditional media outlets owned by pro-government business circles further polarize the newly established democracy-authoritarianism divide [in the country].” (Metin and Ramaciotti, 2022, p. 27) This statement reflects itself in the physical world: the owners of more than 80 percent of the media outlets in Turkey have economic or political ties with the ruling party AKP (Media Ownership Monitor Turkey, 2021), which results in the inevitability of the commercial influence on the editorial content.

### **Focus on the digital environment**

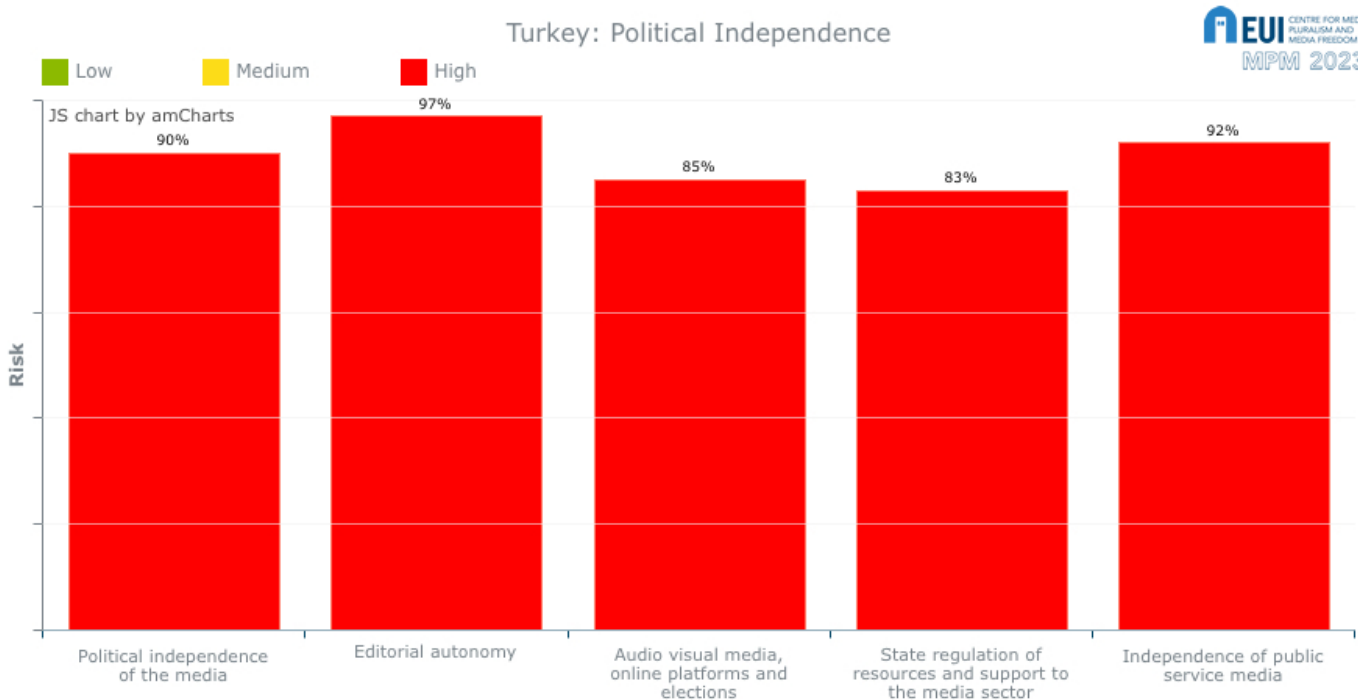
With the amendment introduced to the law No. 6112 on the Establishment of Radio and Television Enterprises and Their Media Services in 2018, the Radio and Television Supreme Council (RTUK) became the enabler and controller authority regarding the Internet. The Internet broadcasts have become subject to the control and “monitoring” of the RTUK. However, even though the ownership information is available in Trade Registry Gazette, the law does not oblige media service providers to publish their ownership structure on their website. Further, no ownership and/or even editorial information is available for some very popular social media accounts and the websites affiliated with them. Current laws and regulations do not guarantee to prevent a high degree of ownership concentration considering the digital evolution of the media sector.

The only regulation in Turkey regarding the copy-right is the Law on Intellectual and Artistic Works that helps protect photojournalism from any copy-right violation. There is no specific financial agreements between digital intermediaries and news media producers to remunerate the publishers for the use of copy-right protected content. According to Revenue Models of Digital Newsrooms (2021), the main revenue in the digital news organizations are subscription, crowdfunding and grant programs other than advertising. Diversifying income without relying on a single financing source is important to ensure editorial independence.



### 3.3. Political Independence (89% - high risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of 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.



The Political Independence area is associated with high risk (89%).

The indicator on **Political independence of media** scores a high risk (90%). Although article 19(b) of Law No. 6112 Establishment of Radio and Television Enterprises and Their Media Services ensures that entities such as political parties, local administrations, unions, professional associations, co-operatives and companies established by those and persons who are a part of those entities cannot be direct or indirect shareholders of any audiovisual media, which prevents the direct political interference, political control of the media mostly works through companies or persons affiliated with the government. The owners of the mainstream media are clear examples of this circumstance in the Turkish media sector, i.e. Turkuvas Media Group, Demirören Media, Doğuş Media Group. TRT (PSM of Turkey) and Anadolu Agency (state-run news agency) are also under the direct control of the President. Additionally, in October 2022 under an investigation led by the Attorney General's Office the office of Mezopotamya News Agency was searched by the police, and their journalists were arrested (Diken, 2022).

The indicator on **Editorial autonomy** has the highest risk score (97%) in this area. The appointments and dismissal of editors-in-chief is highly dependent on the political influence (i.e. Can Dündar, Sedat Ergin, Fikret Bila, Ahmet Hakan and so on). President Erdoğan's reference to Ahmet Hakan, the editor-in-chief of the Hürriyet newspaper, as the journalist who does what is necessary could be perceived as evidence of political influence (Kısa Dalga, 2022). Also, the systemic fines of Radio and Television Supreme Council and the Press Advertisement Agency for the oppositional news media outlets such as Tele 1, KRT, Halk TV, Flash Haber, Fox TV, BirGün, Cumhuriyet and Evrensel are the indirect instruments to clamp down on the editorial autonomy. By October 2022, 65 journalists and press workers have been either imprisoned or

convicted (MLSA, 2022).

The indicator on **Audio visual media, online platform and elections** scores a high risk (85%). The Law No. 298 states that political parties and independent candidates may make oral, visual and written propaganda either via advertising or via opening a website until the end of the designated election propaganda period. However, there are no regulations or effective measures that aim to ensure transparency and fairness of political advertising on online platforms during electoral campaign in Turkey. Additionally, there are no effective measures or regulations on reporting campaign spendings on online platforms in a transparent manner as well. The 2022 European Commission's Progress Report shows no improvement as in the previous year. The report states that "the public service broadcaster, Turkish Radio and Television Corporation (TRT [PSM of Turkey]), is affiliated with the Presidential Communication Authority, and the Radio and Television Supreme Council (RTÜK) with the Ministry of Culture and Tourism. There were no changes to TRT's editorial policy which reflects the government's official lines [in terms of fair representation of political actors]." (European Commission Türkiye 2022 Report) Although Article 5 of the Turkey Radio and Television Law No. 2954 prohibits one-sided, partisan broadcasting, the law is not implemented effectively, i.e. the biased broadcasting practices of TRT such as stopping live broadcasting during an oppositional leader's criticism of the economic situation, unequal screening time for the weekly parliament meetings in favour of the ruling party AKP (Önderoğlu, 2022).

The indicator on **State regulation of resources and support to the media sector** scores a high risk (83%). The reallocation of spectrum in Turkey has not been pursued since 1994, which causes delays in the transition from the terrestrial broadcast to digital broadcast and thus leads to inefficient use of resources. Despite the fact that there is no direct subsidy or state support for the media sector, the Press Advertisement Agency (BİK) is tasked with allocating official advertisements and announcements to the print media according to their circulation. However, the Agency's disposal of its power to prohibit advertisements in case of violation of media ethics functions as a censorship mechanism, i.e. permanent official advertisement ban on the left-wing newspaper Evrensel. In August 2022 the Supreme Court ruled that the sentences based on the Press Ethical Principals were neither fair nor objective, and were against the freedom of expression and freedom of the press. The court concluded that those sentences have become a punishment instrument to intimidate rather than to serve to regulate (Bianet, 2022). After the court decision, the Press Advertisement Agency announced that they will refrain from taking the complaints about the Press Ethical Principals into their agenda until the Parliament agrees an amendment on the Article 49 of the Law no. 195, which regulates the Agency.

The indicator on **Independence of public service media** scores a high risk (92%). The appointments and dismissals are dependent only on the President's decisions. The board of TRT (PSM of Turkey) is under the political control of the President and the government since its members are people who are affiliated with the government, such as a pro-governmental journalist, a researcher at SETA (pro-governmental think-tank), the son of the Minister of Labour and Social Security, a writer at Daily Sabah (pro-governmental newspaper). TRT is subject to Turkish Court of Accounts (TCA) in terms of financial audit. The 2022 report prepared by the Turkish Court of Accounts and presented to the Parliament demonstrates the correlation between the loss of revenue caused by the removal of 2%-tax-share of electricity bills in 2021 and the increase in bandrole fees on communication devices such as mobile phones, smart watches and tablets, which is a decision made without any discussion (Dokuz8 Haber, 2022). This situation could be interpreted as an arbitrary compensation for what is seen to be a revenue loss for the government. However, due to TRT's unfair time allocation favoring the ruling party's candidates in the last elections held in 2019 and its role as a propaganda tool, criticisms have been raised on the sources of income since the majority of it

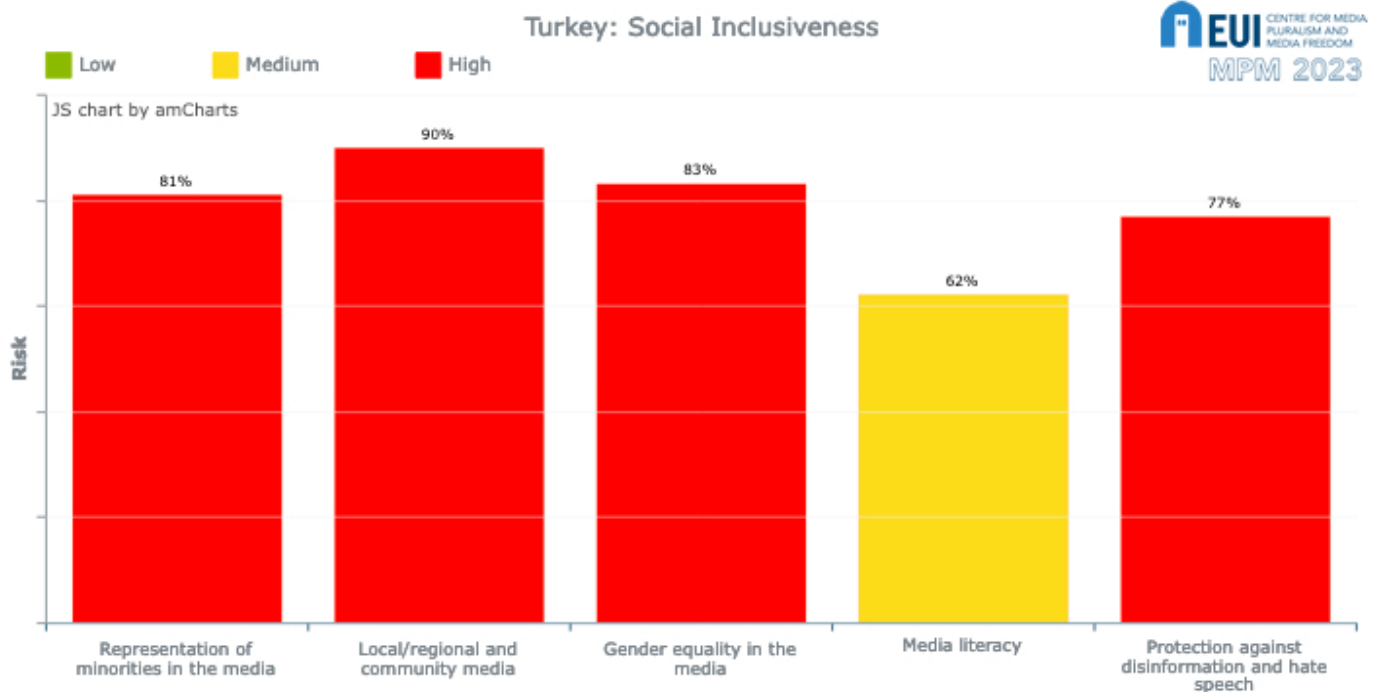
relies on tax shares. The oppositional parties claim that TRT has adequate resources to cover its high-budget productions funded by the public. However, the government does not create an environment where the financing of PSM is publicly discussed.

### **Focus on the digital environment**

The Political Independence area scores 78% in the digital environment. The company code of conduct of the international social media companies such as Meta, Twitter, etc., could be considered as the only rulebook within the framework of the transparency of online political advertising on those platforms. Only Eksisozluk.com (the biggest online forum in Turkey) has their ad library easily available, however it goes as far as October 2022 and the ad buyers are all private commercial companies. Although the Personal Data Protection Authority (PDPA) in Turkey regulates the data processing including but not limited to the data collection, transfer, protection, right to be forgotten, etc., in the last election in Turkey, which was the renewal election for the Municipality of Istanbul, the main oppositional party CHP brought out that the voters' data was given to the ruling party without consent. This violation of personal data privacy was left unanswered by the PDPA. Thus, we could conclude that the data protection authority in Turkey does not take sufficient initiative to monitor the use of personal data on individuals by political parties for electoral campaigning purposes. On top of all of these matters, there is no regulation on online public service mission of TRT.

### 3.4. Social Inclusiveness (79% - high risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against disinformation and hate speech.



The **Social Inclusiveness** area focuses on the access to media by specific groups in society: minorities, local and regional communities, women, and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against illegal and harmful speech. The indicators in the Social Inclusiveness area are associated with a high risk (78%). In 2022, there has been no positive change in laws, regulations, or state policies related to the Social Inclusiveness area. However, due to revisions in some sub-indicators, particularly in Media Literacy and Protection against Illegal Harmful Speech, the risk percentage has decreased.

The indicator on **Representation of minorities in the media** scores a high risk (81%). It is the same as the previous year's score. As mentioned by our interviewees Prof. Dr. Baskın Oran (2022) and Prof. Dr. Samim Akgönül (2022), none of the minority groups in Turkey still do not have adequate access to either public or private media outlets. Since 2004, the Public Service Media (PSM) has been broadcasting in five minority languages and dialects. However, merely broadcasting in minority languages does not ensure media pluralism as the PSM has always been under state control. As mentioned by Prof. Dr. Akgönül there are two important aspects; firstly, it has to be considered how minority groups are portrayed in fictional programs such as television series and movies; secondly, it has to be focused on the involvement of minority groups in scheduled programs like news broadcasts and discussion programs. In Turkey PSM fails to provide proper access to both legally recognized and unrecognized minority groups in both cases. On the other hand, Akgönül notes that there are numerous streaming platforms such as Netflix, Amazon Prime, Gain, and BluTV, that attempt to represent minority groups by producing movies, documentaries, and TV programs that feature minority groups. Media accessibility for people with disabilities is also still problematic. Although a more comprehensive regulation on "the accessibility to broadcasting services for persons with

disabilities" came into force (October 11, 2019), people with disabilities still face difficulties in accessing media. The regulation included provisions for both blind and deaf people and required media outlets to provide not only subtitles but also sign language and audio descriptions. While there has been an increase in the availability of these services, there is still much more work to be done, since the sanctions for non-compliance with the law are not being adequately enforced.

The indicator on **Local/regional and community media** scores a high risk (90%). The risk percentage is still the same. In Turkey, community media faces significant challenges due to restrictions on media freedom and a lack of legal recognition and support. This is making it difficult for them to access funding, legal protection, and other resources. On May 1<sup>st</sup>, 2021, the Directorate General of Press Advertisement (BİK)<sup>[1]</sup> made a minor modification to the existing law, allowing small-scale media outlets that operate outside the mainstream to receive public advertising support. However, the BİK still distributes public ads in a non-transparent and arbitrary manner (MPM 2021).

The indicator on **Gender equality in the media** (83%) scores high risk. PSM does not have a comprehensive gender equality policy. In 2021, TRT's management board has been restructured; two women became board members. This year in private media outlets, the number of women executives has increased. This is why the risk percentage has decreased by 5% in comparison to the previous year. The representation of women in media is still problematic. Two initiatives have been established in Turkey to promote the studies and expertise of female academics, journalists, and experts. "Sensiz Olmaz Sessiz Olmaz" aims to create a database of female experts to make it easier to find female experts according to their fields of expertise. The project also provides training to help women experts speak publicly and use social media to increase engagement. The "Mor Fihrist" project by the Demir Leblebi Women's Association similarly created a database of women experts in different fields. According to the project leader of Sensiz Olmaz Sessiz Olmaz, journalist Gülbin Ayşe Karabat mainstream media outlets in Turkey, such as NTV and Haberturk, use the database regularly to find female experts. Also, alternative media outlets and international media outlets with bureaus in Turkey, such as DW and BBC Turkey, tend to invite more female experts than male ones. Unfortunately, as mentioned by Karabat, the situation is more problematic with pro-governmental media outlets.

The indicator on **Media literacy** shows medium risk (62%). In 2022, RTÜK and the Ministry of Education (MEB) resigned a protocol regarding media literacy.<sup>[2]</sup> This protocol aimed to introduce elective media literacy courses in secondary schools exclusively for 7<sup>th</sup> and 8<sup>th</sup> graders. However, the present curriculum does not cover subjects such as digital security, cyberbullying, digital identity, and digital literacy. Media literacy activities do not totally embrace adults, elderlies, women, migrants, and other vulnerable groups. On the other hand, civil society is making efforts to promote digital media literacy through various projects. In recent years, Habitat<sup>[2]</sup>, Media Literacy Association (MOD)<sup>[3]</sup>, Uğur Mumcu Investigative Journalism Association (UMAG)<sup>[4]</sup>, Teyit<sup>[5]</sup>, etc. developed some projects and training programs. Also, lifelong learning centers of İstanbul Municipality (İSMEK), İzmir Municipality, and several other municipalities, offer training programs on media literacy to enhance the digital skills of individuals, including vulnerable groups like the elderly<sup>[6]</sup>. In 2022, the risk percentage decreased from 71% to 62% due to changes in the sub-indicators and the positive impact of projects, most of which were developed by civil initiatives and municipalities.

The indicator on **Protection against disinformation and hate speech** shows high risk (77%). This year sub-indicators were adjusted and due to changes the risk percentage decreased from 92% to 72%. In 2022, a center was established within the Directorate of Communications to combat disinformation. The Presidential Communications Director announced on his Twitter account<sup>[8]</sup> that "We have established an

independent unit within our Directorate of Communications to counter systematic disinformation campaigns against our country. I congratulate İdris Kardaş, who was appointed as the coordinator of our center, and wish him success." However, since the center is linked to the President, it may not function independently. On October 18, 2022, the government published the amendment to Law No. 5187 in the official gazette. This amendment is popularly known as the "disinformation law" in society. There are numerous articles in the amendment that have sparked controversy, especially those that seek to regulate online advertisements of digital native media. In this law, there is no clear definition of disinformation and hate speech, it is leaving it up to the government's interpretation. Academics, civil society, activists, and journalists argue that it violates freedom of expression and limits digital native media, mostly alternative media outlets that operate online (Evrensel, 2022). On the other hand, civil society works harder to detect and monitor both disinformation and hate speech. Teyit<sup>[9]</sup>, Doğruluk Payı<sup>[10]</sup>, and Doğrula<sup>[11]</sup> are well-known fact-checking initiatives that adopt high ethical standards and are assessed by International Fact-Checking Network (IFCN) for transparency. These initiatives are highly effective, but it would be inaccurate to say that they are active nationwide. People who lack digital media literacy skills are unlikely to follow these organizations or the content that they produce. Furthermore, as pointed out by Gülin Çavuş (2022), the chief editor of Teyit, political polarization makes it difficult for them to reach a wider audience. She believes that their work is not well-known by all members of society, perhaps only by slightly more than half of the population. In the countries like Turkey, the spread of disinformation directly affects the spread of hate speech. According to Nayat Karaköse (Programme Coordinator, Hrant Dink Foundation-HDV), our attention should be directed towards disinformation because it can incite hate speech and, ultimately, lead to hate crimes. The Hrant Dink Foundation (HDV) is a well-known organization that focuses on combating hate speech and runs several projects within this area. Its hate speech monitoring project, which has been ongoing since 2009, is perhaps its most significant project<sup>[12]</sup>. HDV collaborates with academics, third-party organizations, other NGOs, independent researchers, and various national and international stakeholders to carry out its media monitoring work on hate speech.

### **Focus on the digital environment**

As mentioned in the previous year's report, the change in Law No. 5651 was controversial, as it allowed courts to order the removal of online content that violates personality rights. Article 9 of this law affected freedom of expression, leading to increased content removal and bans on the net (EngelliWeb 2021, EngelliWeb 2022). The amendment to Press Law No. 5187 in 2022, known as the "disinformation law," made the situation even more difficult. However, civil initiatives, alternative media outlets, NGOs, academics, and activists have worked harder to fight against disinformation and hate speech, which spread much faster due to the election year.

## 4. Conclusions

**Fundamental Protection** (74% - high risk) All indicators, except Independence and effectiveness of the media authority (65%), and Universal reach of traditional media and access to the internet (50%), score high risk. In 2022 the unemployment rate of journalists is 18.3%, the press cards of many journalists are canceled without legal reason, and freelancers and self-employed journalists still are not protected by Press Labour Law.

*Recommendations:*

- To the State: Prosecutions without evidence of criminal wrongdoing that are frequently brought under anti-terrorism laws should be stopped. Court rulings imposing long-term pre-trial detention periods for journalists should be abolished in line with the rulings of the European Court of Human Rights. The attacks and threats targeting journalists should be punished accordingly especially when they are organized acts.
- To the State: Imposing heavy fines against critical media outlets by public regulatory bodies as a censorship mechanism should be avoided and public resources for the state subsidy of the media should be evenly distributed.
- To the State: The access blocks imposed by criminal judgements of peace on critical news reporting, should be considered a violation of freedom of expression and the press in line with the decision of the Constitutional Court which asked for a new law to be enacted by the Parliament.
- To the State: The blocking of access to social media platforms and Internet throttling based on arbitrary decisions should be abandoned and the public's right to information should be secured

**Market Plurality** (73% - high risk). All indicators, except Transparency of media ownership (54% - medium risk), score high risk. There is no improvement neither in terms of plurality of media providers nor in terms of plurality in the digital market. The unregulated structure of the digital environment, the lack of financial support for local media, and the lack of self-regulatory effective measures cause the emergence of a vulnerable media market.

*Recommendations:*

- To the State: In order to prevent cross-ownership and to guarantee plurality in the media market new law and regulations should be enacted. The regulations on the concentration of ownership should also cover digital media.
- To the State: New laws and regulations should be enacted and implemented effectively to directly subsidize local media. New incentives should be considered to encourage for establishment of local media outlets, which aim to increase employment in the regions outside Istanbul.
- To the State: The transparency and fairness of the allocation of indirect subsidies and advertising investments of public organizations should be ensured.
- To the Self-Regulatory Bodies: To ensure independence from commercial influence effective measures should be implemented in case of violations that harm journalistic integrity.

**Political Independence** (89% - high risk). All indicators in this area score high risk. The government's and the Presidency's heavy influence on the institutions that must be impartial, transparent and fair such as regulatory bodies (Radio Television Supreme Council and Press Advertisement Agency), TRT (PSM of Turkey) and Anadolu Agency (state-run news agency) harm the political independence and the freedom of media in Turkey.

*Recommendations:*

- To the State: The independence, fairness and impartiality of the regulatory bodies, Radio Television Supreme Council and Press Advertisement Agency, should be ensured and guaranteed in order to provide a democratic, pluralist, and free media environment.
- To the State: The regulation on the appointments and dismissals in TRT and Anadolu Agency should be changed in favor of guaranteeing the independence and impartiality of the management as well as of the editorial policy.
- To the State: The transparency of political advertising should be regulated and monitored especially in times of election.
- To the Self-Regulatory Bodies: Effective measures should be taken and implemented in order to protect editorial independence from direct or indirect political interference.

**Social Inclusiveness** (79% - high risk). In the area of Social Inclusiveness, all indicators except Media Literacy show high risks. In 2022, the amendment of the Press Law, known as the "Disinformation Law," has come into force, causing some concerns among civil society as it may be used to control digital native media, since the law regulates online ads, thereby affecting the freedom of expression of digital media.

- To the State: to develop a policy to guarantee access to media for minorities.
- To the media industry: to promote the representation of minority groups in Turkey. Media outlets should give proper access to media for minority groups.
- To the PSM: to represent all minority groups. PSM should broadcast independently and stay away from biases.
- To the State, PSM, and media industry: to promote gender equality in newsrooms. There is a need to adopt a well-developed gender policy.
- To the State: to develop media literacy skills of children. Media literacy courses should be mandatory courses given by media professionals and experts.
- To the State: to develop digital media literacy skills of all. There is a need to adopt a policy on the education of the elderly, minority groups, and other disadvantaged groups of people.
- To the State: to fight against harmful speech and disinformation, the State should work with other stakeholders, such as NGOs, fact-checkers, academics, journalists, opposition parties, and representatives of digital platforms. While doing so, they should not harm freedom of expression.



- To the State: not to use the amendment to the Press Law for censorship or to limit online media.

## 5. Notes

- [1] Please see: <https://bik.gov.tr/kurumsal-haberler/resmi-ilan-ve-reklam-yonetmeliginde-degisiklik/>
- [2] Please see <https://habitatdernegi.org/blog/dijitalde-hayat-kolay-projesi-dijital-okuryazarlik-egitimi/>
- [3] Please see <https://medyaokuryazarligi.org/>
- [4] Please see <https://www.umag.org.tr/tr/vakif/226/projeler>
- [5] Please see <https://teyit.org/yayinlar#dijital-okuryazarlik-ogretmenden-ogretmene>
- [6] Please see <https://heryastadijital.ibb.istanbul/kategori/egitimler/15/dijital-okuryazarlik>
- [7] Please see: <https://www.rtuk.gov.tr/rtuk-ve-milli-egitim-bakanligi-arasinda-medya-okuryazarligi-is-birligi-protokolu-imzalandi-/4324>
- [8] Please see <https://twitter.com/dmmiletisim?s=20>
- [9] Please see <https://teyit.org/>
- [10] Please see <https://www.dogrulukpayi.com>
- [11] Please see <https://www.dogrula.org>
- [12] The project involves scanning all national newspapers and about 500 local newspapers for predetermined keywords such as "traitor," "proselyte," "refugee," "Christian," "Jew," and "separatist."

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## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Yasemin</i>	<i>Inceoglu</i>	<i>Prof. Dr.</i>	<i>Bahcesehir University</i>	X
<i>Tirse</i>	<i>Erbaysal Filibeli</i>	<i>Associate Professor</i>	<i>Bahcesehir University</i>	
<i>Can</i>	<i>Ertuna</i>	<i>Assistant professor</i>	<i>Bahcesehir University</i>	
<i>Yagmur</i>	<i>Cenberli</i>	<i>Research Assistant</i>	<i>Bahcesehir University</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>Orhan</i>	<i>Sener</i>	<i>Representative of a journalist association</i>	<i>TGS (the Journalists' Union of Turkey) Academy</i>
<i>Sinan</i>	<i>Aşçı</i>	<i>Representative of a media users/consumers organization</i>	<i>Media Literacy Association</i>
<i>Şükrü Oktay</i>	<i>Kılıç</i>	<i>Representative of an Internet Service Provider/Video Sharing Platform/internet platform/social media</i>	<i>Fayn</i>
<i>Burcu</i>	<i>Karakaş</i>	<i>Representative of a publisher association</i>	

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