

# **Media Situation Index (MSI) in the Republic of Moldova for 2016**

## **Annual Report**



CHISINAU, 2017

*The report was developed with the financial support of the Civil Rights Defenders organisation from Sweden, an Independent Journalism Center partner.*

## **ABBREVIATIONS**

APEL – Electronic Press Association from Moldova  
ATUG –Autonomous Territorial Unit of Gagauzia  
BCC–Broadcasting Coordinating Council  
CC –Competition Council  
CEC – Central Election Commission  
CoE –Council of Europe  
DP – Democratic Party of Moldova  
EU –European Union  
GRT – Gagauzia Radio Television  
IJC–Independent Journalism Center  
IPA– Independent Press Association  
MDL – Moldovan lei  
MIA – Ministry of Internal Affairs  
NCI – National Commission on Integrity  
NGO -- Nongovernment organization  
NPAI – National Public Audiovisual Institution  
OSCE –Organisation for Security and Co-operation in Europe  
PAG– People’s Assembly of the Autonomous Territorial Unit of Gagauzia  
PCRM –Party of Communists of the Republic of Moldova  
PGO – Prosecutor General’s Office  
PL –Liberal Party  
PLDM – Liberal Democratic Party of Moldova  
PSRM – Party of Socialists of the Republic of Moldova  
SC – Supervisory Council  
SCM – Superior Council of Magistracy  
SIS –Security and Intelligence Service

## **Preliminaries**

This report provides an assessment of the situation of the media in Moldova in 2016 based on two key elements:

- Media Situation Index (MSI) methodology (see Annex 1);
- reviews and assessments of events that during the reporting period had a direct or an indirect impact on the situation of the media.

The MSI methodology, applied for the first time, contains seven indicators relevant to the realities of the media in Moldova:

1. legal framework regulating media activity;
2. the political context;
3. the economic environment;
4. the professional environment;
5. quality of journalism;
6. information security from a media perspective;
7. safety of journalists.

These 7 indicators collectively include 15 statements with up to 5 choices of endings for each one. Each ending is assigned points on a scale from zero to four with four as the best and zero as the worst. The index for each indicator is the average of the total score.

The MSI was determined based on the written opinions of a team of 14 expert evaluators under the auspices of the International Journalism Center (IJC): two lawyers; three media managers and nine media experts (one from the Transnistrian region, one from the Autonomous Territorial Unit of Gagauzia (ATUG), one from the Press Council, one from the audiovisual field, one from print media, one from online media and three from relevant nongovernment organizations (NGOs). Each expert evaluator completed the MSI table (Annex 2).

The overall MSI is the average of the total scores of the evaluators for the 15 statements in the 7 indicators. This value indicates the situation of the media in the year assessed: good, relatively good, serious problems or the situation is grave or extremely grave.

The MSI methodology provides a diagnostic tool for media as a whole but also for each aspect/indicator separately. From this perspective, the MSI determines areas in which interventions are appropriate to improve the situation of the media for the benefit of citizens and society.

#### **Score interpretation for each indicator and for each statement:**

- 60–50: the situation is good
- 49–39: the situation is relatively good
- 38–28: the media has serious problems
- 27–17: the situation is grave
- 16–0: the situation is extremely grave

The reviews and assessments of events that had a direct or an indirect impact on the situation of the media in Moldova further substantiate the conclusions in this report. The points accumulated for each statement and for each indicator separately are presented for an overall assessment.

The report is divided into chapters that correspond to the seven indicators in the MSI methodology. In addition to the mathematical results of the assessment, each chapter contains a brief chronology of relevant events in 2016 and a summary of the experts' justifications for their ratings.

We are confident that this approach will provide a comprehensive overview of the situation in which the Moldovan media operated during the reporting period.

## **Chapter I. Legal Framework for Media Activity**

The indicator contains three statements:

1. *Media legislation is sufficient, mainly sufficient, largely sufficient, sufficient to a limited extent, insufficient.*
2. *Media legislation is compliant with international standards, mainly compliant, largely compliant, compliant to a limited extent, non-compliant.*
3. *The legislation is applied correctly every time, most often, often, rarely, never or almost never.*

The first scored 30 points, the second 31 points and the third 25. The average was 28.66 points which corresponds to a **situation with serious problems**.

### 1.1. Chronology

- Toward the end of January 2016 after the inauguration of the new Filip Government, the Executive Action Program for 2016–2018 was published. It contained Chapter XV “Mass-media” with 10 provisions including the implementation of a national concept for media development based on enhancing pluralism and freedom of speech, the adoption of a new audiovisual code and the creation of an appropriate framework to develop the advertising sector.<sup>1</sup>
- By the end of February, Parliament had adopted Draft Law 39 on modifying and supplementing Article 66 of the Audiovisual Code in the first and second readings as developed by a group of the Party of Socialists of the Republic of Moldova (PSRM) deputies. The document stipulated that the number of licenses that could be held by a media owner should be reduced back to two. The draft law was registered on February 17; its rapid adoption was motivated by the need to limit media ownership concentration and to ensure media pluralism, both recommendations of the European Union (EU) Council. The draft law stipulated that these provisions were to be applied after the expiration of the current license which meant that the law would be applicable in 2021 for those who obtained licenses in 2014 or in 2022 for those who obtained licenses in 2015.<sup>2</sup>
- On the last day of February, the Parliamentary Commission for Media resumed public consultations on the new draft of the Audiovisual Code that had started at the end of the previous year (a draft code was developed in 2011, however in Parliament it was registered in March 2015 as a legislative initiative). The Commission promised that all suggestions and recommendations would be analysed at its meetings.
- On the first day of March, the deputies of the People’s Assembly of the ATUG (PAG) adopted a new audiovisual law in the final reading heavily criticized by civil society and by the regional public broadcaster’s employees.<sup>3</sup> Analysts expressed fears that the new law would politically subordinate the regional public broadcaster.
- At the beginning of March, media NGOs asked President Nicolae Timofti not to promulgate Law 39 pointing to the lack of transparency in making amendments and attempts to simulate reforms and to protect the private interests of some media owners. NGOs emphasized that the speed with which the draft law was approved heightened distrust in the sincerity to limit media concentration.<sup>4</sup>
- On 10 March, the Broadcasting Coordinating Council (BCC) approved recommendations on the transition mechanism from analogue terrestrial television to digital terrestrial television.<sup>5</sup>
- On 11 March, the Supervisory Council (SC) of the National Public Audiovisual Institution (NPAI) Teleradio-Moldova appointed a new Director of Radio Moldova (Veaceslav Gheorghisenco). The mandate of the former director had expired in February 2015. It is worth mentioning

---

<sup>1</sup>[http://www.gov.md/sites/default/files/document/attachments/guvernul\\_republicii\\_moldova\\_-\\_programul\\_de\\_activitate\\_al\\_guvernului\\_republicii\\_moldova\\_2016-2018.pdf](http://www.gov.md/sites/default/files/document/attachments/guvernul_republicii_moldova_-_programul_de_activitate_al_guvernului_republicii_moldova_2016-2018.pdf)

<sup>2</sup><http://media-azi.md/ro/stiri/deputa%C8%9Bii-au-votat-un-proiect-de-lege-care-las%C4%83-loc-pentru-mai-multe-%C3%AEntreb%C4%83ri>

<sup>3</sup><http://gagauzinfo.md/index.php?newsid=23670>

<sup>4</sup><http://topmedia.md/organizatiile-nequvernamentale-de-media-cer-presedintele-nicolae-timofti-sa-nu-promulge-legea-de-modificare-a-codului-audiovizualului---71059.html>

<sup>5</sup><http://cca.md/news/cca-aprobat-recomand-rile-privind-mecanismul-trecerii-radiodifuzorilor-de-la-televiziunea>

that in 2015 the SC had attempted to elect a new director in April and in June, but both attempts failed.<sup>6</sup>

- In the middle of March, the Standing Bureau of Parliament made a final decision that operators and photographers would have access to Parliament's meeting room to take their own pictures.<sup>7</sup>
- At the end of March, the government submitted a draft law developed by the Ministry of Internal Affairs (MIA) to Parliament for examination that was harshly criticized. While it was still under discussion, media NGOs highlighted its shortcomings, namely that some of its provisions would allow censorship on the Internet and would violate the Law on Freedom of Expression. Civil society proposals, however, were ignored.<sup>8</sup>
- At the beginning of April, 24 NGOs expressed their concerns regarding the potentially negative consequences for fundamental human rights that could result from adopting the MIA draft law referred to as the Big Brother Law.<sup>9</sup>
- In the middle of April, the BCC approved the Strategy for Covering the National Territory with Audiovisual Program Services (2016–2018). The strategy contained five objectives including the implementation of digital terrestrial television.<sup>10</sup>
- At the beginning of May, the Head of State promulgated Law 39 modifying and supplementing Article 66 of the Audiovisual Code. The law was challenged by civil society which advocated the urgent adoption of a new audiovisual code.<sup>11</sup>
- At the end of May, a group of deputies from the PSRM offered a legislative initiative that established sanctions for propaganda on homosexuality among minors in the press, Internet, audiovideo spots, etc. In reply, media experts and journalists pointed out that this draft was prejudicial, contravened the Law Ensuring Equality and did not comply with UN standards.<sup>12</sup>
- In the middle of June, in two readings the Supreme Council of Tiraspol adopted amendments to the criminal code of the breakaway region introducing criminal responsibility punishable by a fine of between 500 and 1000 conventional units or imprisonment for up to three years for denying the positive role of the Russian Federation's peacekeeping mission in the Transnistrian region.<sup>13</sup>
- In July, the government approved the Action Plan for 2016–2018. For the media, the document set out five actions, but none was aimed at the "Creation of an appropriate framework to develop the advertising sector," the provision found in the Action Plan of the same government for the same period.<sup>14</sup>
- At the beginning of September, the regulations for the media on the coverage of presidential elections on 30 October 2016 in Moldova were approved.<sup>15</sup>
- At the beginning of October, the Transnistrian leader rejected a set of laws that had aroused the discontent of journalists as it had aimed to reduce their salary fund, to change the procedure for appointing and dismissing editors-in-chief, to restrict official media access to events organized in the region and to prohibit using video and audio equipment.<sup>16</sup>
- On 19 October, the government submitted proposals for amending and supplementing the Audiovisual Code which came from the BCC. The amendments

<sup>6</sup><http://trm.md/ro/social/veaceslav-gheorghii-senco-este-noul-director-radio-moldova/>

<sup>7</sup><http://www.realitatea.md/decis--operatorii-vor-avea-acces-in-sala-de-sedinte-a-parlamentului--iata-ce-conditii-trebuie-sa-indeplineasca--video-doc-36146.html>

<sup>8</sup><http://media-azi.md/ro/stiri/un-proiect-de-lege-avizat-de-guvern-care-nu-%C8%99Binut-cont-de-propunerile-ong-urilor-de-media-este>

<sup>9</sup><http://media-azi.md/ro/stiri/apel-public-cu-privire-la-proiectul-de-lege-propus-de-mai-%C8%99i-adoptat-de-guvern-care-extinde-%C8%99i>

<sup>10</sup><http://cca.md/news/cca-aprobat-strategia-de-acoperire-teritoriului-na-ional-cu-servicii-de-programe-audiovizuale>

<sup>11</sup><http://media-azi.md/ro/stiri/articolul-66-al-codului-audiovizualului-va-fi-modificat-dup%C4%83-ce-%C8%99eful-statului-promulgat-legea>

<sup>12</sup><http://media-azi.md/ro/stiri/psrm-vrea-s%C4%83-sanc%C8%99Bioneze-presa-pentru-subiectele-ce-promoveaz%C4%83-homosexualitatea-jurnali%C8%99titi>

<sup>13</sup><http://www.europalibera.org/a/27805301.html>

<sup>14</sup><http://lex.justice.md/md/365929/>

<sup>15</sup><http://cec.md/index.php?pag=news&id=1001&rid=17602&l=ro>

<sup>16</sup><http://media-azi.md/ro/stiri/%C8%99evciuk-nu-promulgat-setul-de-legi-care-limiteaza-drepturile-jurnali%C8%99tilor>



aimed, "...to supplement the current law with new legal rules that would cover the procedure for providing on-demand broadcasting services as well as conditions for transmitting short excerpts from the signals of program services that cover events of major importance."<sup>17</sup>

- On the first day of November, the Superior Council of Magistracy (SCM) suspended its own regulation on access to court premises which contained restrictive rules for media participation in public hearings. Civil society had qualified the adoption of this regulation as abuse by the SCM.<sup>18</sup>
- On 17 November in the second reading, Parliament adopted the draft law on amending Article 71 of the Code on Contraventions which entailed much higher fines for infringing the Law on Access to Information. The draft was developed by IJC experts.<sup>19</sup>

## 1.2. Expert Opinion and Assessment

Regarding the sufficiency of the legal framework, its compliance with international standards and the manner in which the law is applied, the experts noted the following.

- Media legislation is largely sufficient since it covers key segments: activities of media institutions, freedom of expression, access to information, operation of the BCC, etc.
- There are no regulations referring to online media which makes it impossible to make the content administrators of some portals accountable. Namely, there is no obligation to indicate who the portal's owners are, who the content administrators are or who the authors of the material posted are. There were cases of unlawful seizure of content and cases when some portals published false material that denigrated individuals; however, those affected could not identify the perpetrators or administrators to bring them to justice or to ask them to publish denials.
- There is a need for a number of other specific regulations. In the audiovisual sector, for example, it is appropriate to separate general services from thematic ones in order to provide fair working conditions for each category of audiovisual media. With regard to print media, we definitely need a new press law since the current one is out of date.
- Many provisions in the audiovisual legislation are also out of date. There is no clarity, for example, in the chapter on locally produced programming, and it does not stimulate domestic product development. The sanctions for violating legal rules are trivial, so often it is more convenient for employers to violate the legislation than to comply with it. The performance of the media during the electoral campaign offers conclusive evidence of this.
- Adopting Law 39 reducing the number of licenses held by a media owner from five to two has not changed the situation regarding media concentration.
- The Government Action Plan for 2016–2018 provided that by the end of 2016 a new Audiovisual Code should be adopted in accordance with Council of Europe (CoE) resolutions, EU directives, good community practices and the recommendations of development partners. A new code has not been adopted; rather, Parliament has patched the current code several times which has not improved the situation in the field.
- In 2016, a new law on audiovisual media was adopted in the ATUG that disrupted the activity of the regional public broadcaster for a certain period of time. The uncertain situation when some broadcasters and service providers were subject to national legislation while others were subject to ATUG legislation persists. There is

<sup>17</sup><http://media-azi.md/ro/stiri/cca-propus-noi-modific%C4%83ri-la-codul-audiovizualului-%C3%AEn-vigoare-expert-media-%E2%80%9Ca%C8%99-asemui>

<sup>18</sup><http://media-azi.md/ro/stiri/csm-%C5%9Fi-suspendat-regulamentul-privind-accesul-%C3%AEn-sedile-istan%C8%9Belor-ludec%C4%83tore%C8%99ti>

<sup>19</sup><http://media-azi.md/ro/stiri/amenzi-de-zece-ori-mai-mari-pentru-cei-care-vor-%C3%AEnc%C4%83lca-legisla%C8%9Bia-cu-privire-la-accesul-la>

discrimination against media institutions in the region as the authorities may organize public events to which certain journalists are not invited.

- In specific fields such as access to public information, editorial independence and the relations of editorial staffs with the owners of media institutions, the protection of journalists' sources of information, the provision of public funding for the media and the manner of publishing so-called state advertising, special regulations either are missing or are outdated and need fundamental changes.
- It should be noted that regulations on the activities of community media outlets are totally lacking.
- The Audiovisual Code has so far undergone nearly 100 amendments to more than half of the 68 articles it contains, but neither the legislation nor the actual situation in the field has improved. Moreover, it is somewhat strange that in 2016, the BCC proposed amendments to the Audiovisual Code guided by Directive 2010/13/EU (adopted six years ago) and not by the Directive of the European Parliament and of the Council amending Directive 2010/13/EU of 25 May 2016 on the coordination of certain provisions laid down by law, regulations or administrative actions in Member States concerning the provision of audiovisual media services in view of changing market realities.
- Amendments proposed by the BCC use outdated notions and say nothing about "video sharing platform providers" that European legislation is currently using.
- There are many gaps in the legislation that generate abuses starting with the one that provides access to information and finishing with the one that targets advertising. Legal rules are applied selectively. Some media institutions that even admit to serious errors go unpunished and are thus favoured.
- Aspects of the Law on Access to Public Information are rendered ineffective by the legislation on personal data protection. Several state institutions have restricted journalists' access to public information simply by invoking that protection. They include the Central Electoral Commission (CEC), the Prosecutor General's Office (PGO) and MIA among others.
- The somewhat vague definitions of the principles of trade secrets and state secrets and the lack of their interpretation in the context of the Law on Access to Information allow authorities to use them as excuses when examining media applications for access to information. An analysis of denials for access to information revealed that half were based on the protection of trade secrets.
- If an editorial board criticizes the government, the press services of public authorities will subsequently almost always require written requests for information from that publication. Requesters frequently then wait many days for an answer that is often vague or does not refer to the question. "Government-friendly" editorial boards, on the other hand, generally receive information immediately, so there is discrimination in providing information.
- In reality, there is no effective parliamentary control. It is not present even in examinations of the annual reports of the BCC, NPAI or the Competition Council (CC).
- Attempts to amend the legislation have demonstrated that under the guise of good intentions (reducing propaganda, for example), reference is made to international rules that ultimately end up favouring indigenous media moguls. Legislators go through the motions of requesting advice from international bodies on recommendations and opinions on draft laws, but in reality in the process of their adoption, they ignore the essence of those recommendations.

- An analysis of the BCC's issuance of broadcasting licenses shows major deficiencies. This is apparent in the fact that in a short time, a socialist deputy gained three TV channels.
- Since 2013 in the Transnistrian region when amendments were made to the legislation, private media outlets have encountered serious difficulties. Problems persist especially with newspaper distribution, unfounded accusations against journalists, pressure from the authorities on editorial boards, refusals to provide information that according to the law should be public and limited access to information among others.
- The Law on Advertising, the Press Law and the Audiovisual Code as well as some aspects of the Law on Access to Information do not comply with international standards. Journalists have recently identified major problems trying to obtain information from authorities who are reluctant to abide by legal provisions.
- Some provisions of the legislation are applied differently in different cases. The Law on Freedom of Expression contains provisions covering limitations on the right to freedom of expression, the prohibition of censorship, the protection of anonymous sources, the freedom to criticize state and public authorities and the right to privacy. The adoption of this regulation in 2010 introduced the pre-trial procedure for settling defamation cases, the manner for publishing denials and replies and the manner for assessing moral damages to natural and legal persons. In addition, the circumstances for excluding liability for defamation were explained. This law is largely applied by magistrates in court proceedings with the press.
- Decision makers comply with the legislation superficially and arbitrarily; there is no ongoing and transparent monitoring of their compliance. Political and party control of audiovisual media and media monopolies are acceptable.
- There are many cases when laws are ignored and the responsible persons are not punished. For example, the Law on Privatization of Public Periodicals was ignored by many regional administrations without any sanctions imposed, and the BCC's double standard in adopting decisions to sanction broadcasters for deviations from the legislation on election coverage had no consequences for the BCC.

## Chapter II. Political Context

This indicator contains one statement:

*The political situation is favourable to media activity, mainly favourable, largely favourable, favourable to a limited extent, unfavourable.*

The score was 14.00 points indicating **an extremely grave situation**.

### 2.1. Chronology

- On 11 January, the SC of Gagauzia Radio Televizionu (GRT) proposed modifications to the law on radio and television and the provisional liquidation of the public company GRT to the head of the autonomy and to PAG deputies. Many analysts saw this as defying national law and as a political attempt to replace current employees with persons who would follow the orders of the authorities and thus transform the GRT into an instrument of manipulation as it had been for many years previously.<sup>20</sup>

<sup>20</sup><http://media-azi.md/ro/stiri/compania-public%C4%83-gagauziya-radio-televizionu-ar-putea-fi-lichidat%C4%83>



- At the end of January, the BCC notified the Presidency, Parliament, the government, the PGO, MIA and the Security and Intelligence Service (SIS) about the ATUG draft law. According to the BCC, the draft contained provisions that could censor audiovisual media in the Autonomy and that could, contrary to the provisions of Moldovan legislation, assume responsibility for licensing powers and for the supervision and control of central public authorities and of state bodies thus attacking and undermining the sovereignty and integrity of the state of Moldova.<sup>21</sup>
- On February 29, channel ITV began operating. According to media sources, its managing director Natalia Poleakova (Gheteul) was close to the PSRM. Previously, she had managed online TV channel TSN which was controlled by the PSRM.<sup>22</sup>
- On March 9, lively discussions took place at the meeting of the Working Group on Media Access to the Plenary Hall of the Parliament Building.<sup>23</sup>
- At the end of March, the BCC appeared to be alarmed by the fact that the Head of ATUG promulgated the Law on Radio and Television that contained a number of provisions that contravened the Audiovisual Code and national legislation and that had been severely criticized by the BCC and by civil society representatives.<sup>24</sup>
- In the middle of April, the public found out on MPs' social media posts that Liberal Democratic Party of Moldova (LDPM) deputy Maria Ciobanu who had been very critical of the Communists in recent years would have forced her party colleagues to vote one Party of the Communists of the Republic of Moldova (PCRM) representative onto the SC of Teleradio-Moldova.<sup>25</sup>
- In June, Parliament voted for the "integrity package" of three laws aiming to reform the National Commission on Integrity (NCI). According to one of the laws, the current NCI would be transformed and in addition to the management board, it would also have an integrity council. During the vote after the first reading, this integrity council included a journalist, but at the final reading the legislators excluded the media representative. According to some anti-corruption experts, this indicates that the deputies are afraid of the press.<sup>26</sup>
- At the government session in October, the State Chancellery proposed dismissing Ion Terguta, Director of the National Representation of Moldova on TRCI MIR and to replace him by Valeriu Renita, the former spokesman for Communist ex-president Vladimir Voronin.<sup>27</sup>
- On December 2 and 3, the second edition of Media Forum 2016 was held in Chisinau. Although the authorities were invited and accepted the invitation, they ultimately boycotted the event.<sup>28</sup>
- In the middle of December, a joint statement published by the EU Heads of Mission resident in Chisinau to the Moldovan authorities stated inter alia: "As a follow-up to the Experts' Meeting on Human Rights of the European Union, the United Nations, the Organisation for Security and Co-operation in Europe (OSCE) and the Council of Europe on the one part and the Republic of Moldova on the other on 12 December 2016, and in the context of the recent International Human Rights Day, the Heads of Mission of the European Union resident in Chisinau wish to recall the universal and European standards of democracy and human rights which the Republic of Moldova has committed to, ...the plurality and diversity of the media is essential for the development of a democratic society. It is of crucial importance that all media outlets, both print and

<sup>21</sup><http://cca.md/news/cca-alarat-de-possibilitatea-instituirii-cenzurii-asupra-mass-mediilor-audiovizuale-n-autonomia-g>

<sup>22</sup><http://newsmaker.md/rus/novosti/v-moldove-nachal-rabotu-novyy-telekanal-22894>

<sup>23</sup><http://unimedia.info/stiri/video-discutii-aprinse-la-sedinta-grupului-de-lucru-privind-accesul-presei-in-sala-de-sedinte-plenare-a-legislativului-110923.html>

<sup>24</sup><http://cca.md/news/cca-cere-instituirea-statului-s-nu-admit-subordonarea-radiodifuzorului-public-din-uta-g-g>

<sup>25</sup><http://www.timpul.md/articol/maria-ciobanu-i-a-forat-o-colega-de-partid-sa-voteze-reprezentarii-comunitilor-91231.html>

<sup>26</sup><http://unimedia.info/stiri/jurnalistii-au-fost-exclusi-din-componenta-consiliului-de-integritate-117135.html>

<sup>27</sup><http://unimedia.info/stiri/ion-terguta--a-fost-propus-spre-eliberare-din-functia-de-director-al-mir--un-fost-consilier-al-lui-voronin-i-ar-putea-lua-locul-95894.html>

<sup>28</sup><http://api.md/news/view/ro-forumul-mass-media-2016-situatia-presei-din-r-moldova-1386>

electronic media, are treated in an equal manner and can operate without pressure or threat of closure.”<sup>29</sup>

- On December 30, the BCC issued a broadcasting license for the television station Exclusiv TV to the Company Exclusive Media LLC which reportedly belonged to PSRM deputy Corneliu Furculita. Analysts believed that this would lead to greater media concentration in the hands of oligarchs. Exclusiv TV will retransmit Russian TV channel TNT, but will also offer its own programs during 35% of its broadcasting program.<sup>30</sup>

## 2.2. Expert Opinion and Assessment

Regarding the political context in which the media worked, the experts noted the following.

- The dominant positions in the market held by politicians (affiliates) created favourable conditions for dividing the media and journalists, for their involvement in political information wars and for the use of the advertising market as a lever of influence.
- The involvement of politics in the media and the dependence of the press on political money led to the degradation of the sector. The political context fostered, whether directly or indirectly, “party” or “politically engaged” media. Persons interested in political dividends were generous in financing such media.
- Members of the BCC, de jure, are appointed by Parliament which should ensure their independence; however, seats at the BCC are in fact distributed among the ruling parties. Thus, a position on the BCC is obtained with certain party-related obligations, especially when it comes to issuing broadcasting licenses. This can also explain the fact that some MPs are also important holders/owners of audiovisual media outlets.
- Although Parliament was concerned about the flood of Russian propaganda, at the end of the year the BCC issued a broadcasting license to Exclusiv TV which will retransmit products of Russian entertainment channels. In fact, this is the third license issued to members of the PSRM, i.e. to ruling President Igor Dodon. The first two licenses (NTV Moldova and Accent TV) have already shown in whose service they work.
- There was excessive politicization of the media during the campaign for president on 30 October. The outcome, in turn, caused a considerable decline in the confidence of Moldovans in the media from 42% (in April 2016) to 31% (in October). Some media outlets, particularly those controlled by politicians (TV and radio channels that are part of the General Media Group owned by Vladimir Plahotniuc, Chairman of the Democratic Party [DP]) were manipulative and broadcast propaganda defying the current legislation and the professional norms of journalism.
- The situation was extremely favorable for media connected to politicians, but it was very unfavorable for the independent press. While the former bloomed, the latter could barely breathe. Journalism working for “flowers” is not, however, good for society.
- Throughout the year there were various cases of political pressure on journalists and media outlets.
  - In January during a protest in front of Parliament, the national cable operator Moldtelecom suspended broadcasts of some TV channels covering the protests under circumstances difficult to understand.
  - In February on the talk show “Puterea a patra” on channel N4, Mihai Ghimpu, leader of the Liberal Party (PL) and an MP, said that the private

<sup>29</sup><http://www.jurnal.md/ro/politic/2016/12/15/oficialii-ue-atentioneaza-conducerea-rm-institutiile-mass-media-trebuie-sa-poata-functiona-fara-presiune-si-fara-a-fi-amenintate-ca-vor-fi-inchise/>

<sup>30</sup>[http://adevarul.ro/moldova/politica/maia-sandu-critica-decizia-cca-elibera-licenta-unui-post-tv-apropiat-socialistilor-zeci-canale-controlate-plahotniuc-dodon-1\\_586692865ab6550cb8ecd9a9/index.html?utm\\_source=topmedia.md&utm\\_medium=feed&utm\\_campaign=rss&utm\\_content=topmedia.md](http://adevarul.ro/moldova/politica/maia-sandu-critica-decizia-cca-elibera-licenta-unui-post-tv-apropiat-socialistilor-zeci-canale-controlate-plahotniuc-dodon-1_586692865ab6550cb8ecd9a9/index.html?utm_source=topmedia.md&utm_medium=feed&utm_campaign=rss&utm_content=topmedia.md)

television channel Jurnal TV should have been closed down a long time ago (“I don’t know who is sleeping over there at the BCC”).

- In April, the administration of the private channel TV7 announced the interruption of the satellite broadcasts of the Moldovan company TDB-service with which TV7 had signed a contract, and the Taraclia Police Inspectorate ordered the interrogation of journalists and the seizure of their materials for their investigation into how a public pond became private property.
  - In June, members of the guard service of Drochia Court restricted the access of the journalist and civic activist Oleg Brega to a public trial.
- 
- With the pressure of elections including to the PAG, the political situation was in no case favorable to media activity in ATUG. There were cases when some ATUG mayors used journalists to promote personal interests. In other cases, officials threatened editorial offices by telephone, and if intimidation had no effect, unannounced inspections of the Tax Inspectorate were reported.
  - Presidential elections also were held in 2016 in the Transnistrian region where an unprecedented struggle among political forces affected the media as well. By December, the former leadership of the breakaway region had done everything it could to keep unofficial or critical opinions about the authorities from the public. It remains to be seen what the new leadership will do.
  - Pressure by some politicians and parties on journalists and media outlets has been apparent in the regional press as well. For example, a representative of the DP from Ungheni tried for more than a month to convince a reporter from the newspaper *Expresul* to quit, and another supporter of the DP from Nisporeni tried to corrupt a reporter from *Expresul*.
  - Although ostensibly the political situation did not affect media activity, in fact politicians controlled the press by founding, buying, selling and closing media outlets; by establishing dominant positions in the media market and by involving some outlets and journalists in information wars and in manipulating public opinion. This has seriously affected the natural mission of the media to serve the public interest.
  - Rivalries and fierce struggles between the main political leaders involved the media outlets they controlled either directly or through intermediaries. Consequently, some journalists and media outlets protected the political or other interests of some parties or politicians. At the same time, the media that operated relatively objectively and in a balanced manner about the situation of the country were subject to attacks and intimidation without precedent by the politically controlled media, by party activists or politically engaged experts and by persons employed to discredit or reduce the effect of critical messages and journalistic investigations published by the print media.
  - The attitude of the authorities toward the media was clearly demonstrated at the second meeting of Media Forum 2016. The authorities simply ignored it offering implausible reasons for doing so. In fact, they most likely did not have a message to present at the meeting. As noted, none of the actions assigned to the government on the roadmap adopted at the first meeting of the Forum had been implemented.

### **Chapter III. Economic Environment**

This indicator contains two statements:

1. *The media are economically independent to a large extent, to a medium extent, to a small extent, are not independent.*
2. *The media are editorially independent to a large extent, to a medium extent, to a small extent, are not independent.*

The first scored 15 points and the second scored 22 points for an overall index of 18.50 points which corresponds to a **serious situation**.

### 3.1. Chronology

- On 20 January the television station Kanal D owned by the Dogan Group from Turkey that was launched in Romania in 2007 announced its intention to expand in Moldova. By the end of the year, however, this had not happened.<sup>31</sup>
- In the middle of February, Adevarul Holding abandoned the print version of the newspaper *Adevarul Moldova*. It was launched on 6 December 2010 with a circulation of 7000 copies as part of the Adevarul Holding Trust which at that time was controlled by businessman Dinu Patriciu. In 2012 the trust was taken over by businessman Cristian Burci.<sup>32</sup>
- At the end of February, the Moldavian Business Channel launched in the summer of 2014 was closed. Its owner, Valeriu Plesca, attributed the closing to the deep systemic crisis in the country in general and in the media in particular.<sup>33</sup>
- On 27 March, Dan Lozovan, founder of Media International LLC and owner of the channel Super TV announced his insolvency. The decision to initiate a simplified bankruptcy procedure for Media International LLC came up shortly after the assignment of Super TV to the company Real Radio LLC controlled by Dorin Pavelescu, Director of the advertising agency Casa Media Plus LLC. The agency's founder is the Dutch company OTIV Prime Media which according to an investigation by RISE Moldova is part of the empire of Vlad Plahotniuc.<sup>34</sup>
- On 11 April, RISE Moldova reported that two businessmen from Moldova, an American and a Moldovan, both owners and managers of major media and Internet companies, were involved in the Panama Papers investigation because they had requested the services of Mossack Fonseca's lawyers in Panama City. The major shareholder in Sun Communications, the largest cable television distributor and leading provider of Internet services in Moldova, for 12 years has been an offshore shareholder called Lekert Management Ltd. based in the British Virgin Islands. According to the investigation, in June 2012 the official owner of 50,000 shares of the offshore company (worth one dollar) became Alexandru Sirbu, business partner at Sun Communications with John Maxemchuk. Mr Sirbu allegedly is also a co-owner of TV station N4, and his son Eugeniu, with whom he is a partner at N4, allegedly owns the station Agro TV.<sup>35</sup>
- In early May an investigation by RISE Moldova analyzed the shareholding structure of Transnistrian press institutions and concluded that the media on the left bank of the Nistru River were controlled by the breakaway authorities in Tiraspol.<sup>36</sup>
- At the end of June, mobile telephony company Orange signed an agreement to acquire 100% of the share capital of Sun Communications, the largest operator of cable television in the country, a market player since 1993 and provider of services in Chisinau, Balti and Cahul.<sup>37</sup>

<sup>31</sup><http://ziarulnational.md/o-televiziune-din-romania-vrea-sa-se-extinda-in-republica-moldova/>

<sup>32</sup><http://topmedia.md/adevarul-holding-renunta-la-versiunea-tiparita-a-ziarului-adevarul-moldova-iar-redactia-online-va-fi-formata-doar-din-2-jurnalisti---70169.html>

<sup>33</sup><http://topmedia.md/exclusiv-postul-de-televiziunea-abc-sa-inchis--nu-am-reusit-sa-ne-impunem-ca-produs-declaratiile-propietarului---70768.html>

<sup>34</sup><http://deschide.md/ro/news/economic/25682/Faliment-pentru-un-grup-media-din-Moldova.htm>

<sup>35</sup><http://uniimedia.info/stiri/rise-moldova-proprietarii-unor-televiziuni-din-moldova--implicati-in-ancheta-panama-papers-112898.html>

<sup>36</sup><http://uniimedia.info/stiri/investigatie-rise-cine-sunt-proprietarii-presei-din-transnistria-114153.html>

<sup>37</sup><http://bani.md/contractul-a-fost-semnat-sun-communications-devine-proprietatea-orange--daca-consiliul-concurentei-autorizeaza-tranzactia---76562.html>

- On 6 July, the Court of the Center Sector rejected the writ of summons against the CC submitted by Jurnal TV after the CC had rejected several complaints about the monopolization of the media market in Moldova. According to the lawyer of Jurnal TV, the writ of summons against the CC was aimed at obliging the institution to hinder Vladimir Plahotniuc and Dan Lozovan from monopolizing the media market and to hold the BCC accountable as it was alleged to have provided frequencies illegally.<sup>38</sup>
- In the middle of September the press wrote that the LDPM member Chiril Lucinschi had sold the company AnaliticMedia-Grup JSC, the owner of television station TV7. The new owners were his children. At the beginning of the year, Mr Lucinschi announced that he had also sold the television station TNT Bravo.<sup>39</sup>
- In the middle of October researcher Dorel Samoila noted that in eight months of 2016 the advertising market had shrunk by 1.8 million euros compared with 2015 and by 4 million euros compared with 2014. Consequently, sales of TV advertising could fall below 11 million euros which would be the worst result since 2010. According to the analysis, the market leader is still Prime TV followed by RTR Moldova and TNT Bravo. TV7, which was in third place last year, fell to seventh losing almost 70% of its volume of advertising. The author concluded that stations lost market due to the expansion of the share of online advertising. Another factor was the lack of economic growth which makes the TV advertising market quite dismal.<sup>40</sup>
- On 17 October, less than two weeks before the presidential election, print media reported that the main beneficiaries of money from candidates were TV stations and outdoor service providers (billboards). With contracts of 8.9 million Moldovan lei (MDL), the undisputed leader was General Media Group Corp. LLC of Vlad Plahotniuc. A distant second with campaign advertising of 1.36 million MDL was TV station Comunicatii LLC, owner of the channel RTR Moldova. They were followed by PRO TV and NTV each with about 1.1 million MDL.<sup>41</sup>
- On 1 November the first digital multiplex was launched. Although it will offer national coverage for 15 TV channels, it started with just 8 that signed contracts with Radiocomunicatii: Moldova 1, PrimeTV, TVR Moldova, Canal 2, Canal 3, Publika TV, N4 and Accent TV. Seven additional companies licensed to broadcast in Multiplex A are to be included in the package if they conclude service contracts and are able to pay the monthly fee of 5,600 euros, which in the opinion of many broadcasters is exorbitant.<sup>42</sup> [They are](#) Agro TV, Jurnal TV, TV 7, ITV, Regional TV, Super TV and CTC.

As for the economic environment in which the media worked, the experts noted the following.

- According to European standards, promoting the freedom of the media shall be supported by the state through economic policies as well. In Moldova, only public media enjoy financial support from the state.
- Domestic legislation does not contain separate provisions for media businesses. Although the legislation does provide for special limits on concentrations of ownership in the audiovisual area, their effectiveness is null. For the other types of the media, the legislation provides no obligation to disclose owners (beneficiaries).
- The economic situation in the country does not foster the financial independence of the media. The dominant position in the audiovisual market of companies owned by the

<sup>38</sup><http://www.jurnal.md/ro/justitie/2016/7/6/monopolistii-presei-sustinuti-de-justitie-judecatoria-centru-a-respins-cererea-de-chemare-in-instanta-a-consiliului-concurentei-care-i-protejeaza-pe-afaceristii-plahotniuc-si-lozovan/#update-754709>

<sup>39</sup><http://agora.md/stiri/22496/din-tata-n-fiu--chiril-lucinschi-a-vandut-compania-care-detine-postul-tv7--copiilor-sai>

<sup>40</sup><http://unimedia.info/stiri/vremuri-grele-pentru-televiziuni--in-doi-ani-veniturile-s-au-diminuat-cu-peste-patru-milioane-de-euro-121397.html>

<sup>41</sup><http://www.jurnal.md/ro/politic/2016/10/17/mold-street-cine-castiga-milioane-din-campania-electorala/>

<sup>42</sup><http://media-azi.md/ro/stiri/primele-opt-posturi-tv-au-%C3%AEnceput-s%C4%83-emit%C4%83-%C3%AEn-semnal-digital-terestru>

leader of the ruling party is also reflected in the official documents of the BCC, but the issue is not a concern for public authorities, Parliament, the BCC or the CC.

- The current legislation does not provide adequate, guaranteed funding criteria for public media. Competition in the media and advertising markets does not allow media to develop and/or cover media expenses. The legislation provides for anti-monopoly (anti-concentration) mechanisms that in fact are not applicable to media.
- While there are almost no party media outlets, those funded by parties and/or intermediaries are rooted in practice in Moldova. Their editorial policies are visibly influenced by economic and financial factors.
- The media outlets that want to do independent journalism live from hand to mouth or from one grant to another without economic stability over a long period. Therefore, many editorial offices appear and disappear or are bought to serve as a tool of manipulation. Outside Chisinau the situation is even worse.
- The audiovisual media cannot actually operate on a self-management basis without being financed by owners with political interests. Lack of fair competition in the advertising market does not create conditions for independent media.
- The development of commercial material is welcomed by many journalists as this is a helpful supplement to their low salaries. The more a media outlet or a journalist tries to be independent, the lower the salaries are.
- Public radio broadcasters, contrary to the legislation, have never been given 100% funding to work and perform their specific missions. Thus, to a certain degree they depend on political factors.
- The main television and radio stations are controlled by politicians or businessmen affiliated with political parties. The news from these media outlets is often politicized and manipulated and aimed at polishing the image of a party and at denigrating “undesirable” persons and/or opposition parties. Journalists employed at these institutions fully comply with the instructions of editors/owners in covering events and are not editorially independent.
- We can hardly find media outlets that work independently, but those that do have with a minimal number of staff, usually fewer than 10 employees. No conditions have been created in the country for media to be able to be economically independent. Some media institutions mainly financed by grants from donors do, however, maintain their editorial independence.
- Under conditions of massive media concentration it is very difficult to talk about economic independence. Some owners do not perceive media as a business but instead see it as a personal tool to use in their own interests. At the moment, we have media outlets that serve their owners and are not affected by poor economic conditions. There are also audiovisual media living from advertising and making every possible effort to remain independent, serving the public and providing them a quality product. At the media institutions whose owners are politicians, a clear political influence over content is noted.
- The audiovisual legislation does not provide specific regulations for media businesses. What exists now in the Audiovisual Code (Article 66) is insufficient to ensure fair competition in the media and advertising markets. We need special provisions to limit concentrations.
- The fact that public radio broadcasters are funded from the national budget makes unfair competition for private stations. Similarly, there is unfair competition in the advertising market as well. In fact, we see a monopoly of radio broadcasters in the capital which restricts the development of local/regional media. Audience measurement services are



expensive; they cannot be paid for by local media which creates difficulties for accessing advertising.

- In the ATUG as a rule, private media form their editorial policies independently; however, some made-to-order journalistic products are visible on public media or on various portals. Moreover, there are media that are fully funded by a party. Many editors dependent on the owners of their outlets and the authorities of the Autonomy promote journalists only if the leadership likes their material.
- In the Transnistrian region, all media are economically dependent: 80% are funded by the state and the others are funded either by their owners or by external grants. We can speak about relative editorial independence only with regard to private media, including online outlets owned by NGOs.
- In Moldova, the problem of directing advertising to only certain media outlets persists.
- The current economic legislation does not foster media businesses, [and insufficient regulation and mismanagement by the BCC has stimulated concentrations of ownership instead of discouraging them. The CC is not active in the audiovisual market, and there are no credible audience measurement indicators.
- With some minor exceptions, owners/sponsors of the main media outlets dictate partisan editorial policies which is why their editorial independence is very limited. In most editorial offices, economic and financial factors are not separated from editorial ones. Reporters are often tasked with collecting advertising and preparing subscriptions, and some advertising providers try to take advantage of the editorial dependence on money from advertising by imposing conditions.
- In recent years “customized” journalism has proliferated as some media professionals accept political commitments with the clear aim of defaming or discrediting opponents and use employers’ invented or speculative evidence to bolster their attacks.

## Chapter IV. Professional Environment

The indicator concerned contains two statements:

1. *Media professionalization is sufficient, mostly sufficient, largely sufficient, sufficient to a small extent, insufficient.*
2. *Media professionalization is efficient, mostly efficient, largely efficient, efficient to a small extent, is not efficient.*

The first scored 40 points and the second 23. The average was 31.50 points, a **situation with serious problems**.

### 4.1. Chronology

- In February, the SC of NPAI Teleradio-Moldova adopted the regulations for and the job description of the ombudsman of the national public radiobroadcaster (developed jointly with the Free Press Association of Moldova [APEL] and the Press Council).<sup>43</sup> The service of the ombudsman was established within the NPAI by a decision of the SC on the initiative of media NGOs on 1 April 2014.<sup>44</sup>
- On 9 March the IJC launched the information portal [Mediacritica.md](http://mediacritica.md) to combat the phenomena of propaganda and manipulation in the press and to develop the critical thinking of media consumers. The portal was developed within the media campaign

---

<sup>43</sup><http://trm.md/ro/hotarari-co/>

<sup>44</sup><http://trm.md/ro/serviciul-ombudsmanului/raportul-de-activitate-al-ombudsmanului-2014-2015/>

against false and tendentious information STOPFALS! carried out by the Independent Press Association (IPA), the IJC and the VIP Association of Independent TV Journalists of Moldova.<sup>45</sup>

- On 16 March the Code of Conduct for Accredited Journalists who will have access to the session hall of the Parliament building was adopted.<sup>46</sup>
- On the last day of March, the IPA launched the discussion club STOPFALS! to examine cases of deliberate transmission through media and other communication platforms of false and/or misleading information and to address specific issues of protection of the information space of Moldova.<sup>47</sup>
- On 4 April, journalists' access to a specialized online library at [www.mediasource.info](http://www.mediasource.info) was announced. The platform entitled "Biblioteca Jurnalistului" (Library of Journalists) will facilitate the work of those interested in the field. Supporters of the platform have created a consortium designed to manage the completion of the on-line library. Biblioteca Jurnalistului is an initiative of the Media Program of the Soros-Moldova Foundation.<sup>48</sup>
- In April, RISE Moldova in partnership with the Media Center in Tiraspol and Journalists for Human Rights launched the project Quality Journalism for Democracy. Among other things, this project envisages expanding the community with at least 15 local journalists from five regions: North, Center, South, ATUG and Transnistria.<sup>49</sup>
- On 31 May, APEL launched the study External Pluralism of the Media in the Republic of Moldova in 2015 conducted for the first time based on a methodology developed in the EU and tailored to local realities as part of an initiative of the Soros-Moldova Foundation.
- In October, the Press Council elected a new membership.<sup>50</sup>
- In November, finalists in the contest for the National Journalistic Ethics and Professional Deontology Award established by the Press Council in 2015 were nominated. The winner of the contest was the portal Anticoruptie.md.<sup>51</sup>
- On 2 and 3 December, Chisinau hosted Media Forum 2016 attended by over 180 journalists, editors, media managers, employees of editorial offices, media organizations and associations, advertising agencies, academics related to journalism training and experts from the country and abroad. The forum was organized by the Press Council in partnership with the IPA, the IJC and APEL.<sup>52</sup>

## 4.2. Expert Opinion and Assessment

Regarding media professionalism, the experts noted the following.

- There are five universities in Moldova that have faculties or departments of journalism: four in Chisinau and one in Balti. Academic curricula are approved by the Ministry of Education and meet international requirements to a large extent; however, the teaching staff in some cases are theorists and/or journalists who obtained their degrees in the Soviet period, thus the process of professionalization of future journalists is affected.
- The theoretical knowledge and practical skills acquired by most graduates of these faculties are often in conflict with those demanded in practice. We also note that in most cases there are no codes of conduct at media outlets.

<sup>45</sup><http://trm.md/ro/social/cji-a-lansat-un-portal-informativ-despre-combaterea-propagandei-si-manipularii-din-presa/>

<sup>46</sup><http://topmedia.md/decis-cameramanii-tv-vor-avea-acces-in-sala-de-sedinte-a-parlamentului-doc---71559.html>

<sup>47</sup><http://www.api.md/news/view/ro-api-lanseaza-clubul-de-discutii-stop-fals-1153>

<sup>48</sup><http://topmedia.md/jurnalisti-din-republica-moldova-vor-avea-acces-la-o-biblioteca-online-detalii---72525.html>

<sup>49</sup><http://topmedia.md/risse-moldova-isi-extinde-comunitatea-cu-cel-putin-15-jurnalisti-locali-din-5-regiuni-nord-centru-sud-gagauzia-si-transnistria-detalii---73498.html>

<sup>50</sup><http://media-azi.md/ro/stiri/consiliul-de-pres%C4%83-are-o-componen%C8%9B%C4%83-nou%C4%83>

<sup>51</sup><http://media-azi.md/ro/stiri/au-fost-desemna%C8%9Bi-finali%C8%99tii-concursului-pentru-premiul-na%C8%9Bional-de-etic%C4%83-%C8%99i-deontologie>

<sup>52</sup><http://www.media-azi.md/ro/stiri/la-2-3-decembrie-2016-va-avea-loc-forumul-mass-media-2016>

- There are apparently standard elements of a modern process of professionalization of journalists in place; however, the educational system does not fully meet the needs of the media market, and university curricula reform is very slow. Therefore the efficiency of training institutions is low.
- There are many training opportunities for journalists, but after graduation they mostly comply with editorial norms and standards. Self-censorship remains a characteristic phenomenon. Economic and social conditions, on the one hand, and political affiliation or the affiliation of certain groups with the financial interests of many media, on the other hand, pressure journalists to disregard ethical norms. There are journalists who leave an “opposition” media outlet and go to one belonging to active supporters of the government. The reverse is much less often true. Owners who are representatives of politicians do not need independent journalists, and consumers of information do not have many ways to penalize them.
- Local or international public associations organize training courses from time to time that usually are open to everyone, but journalists from politically engaged institutions and who actually need training most of all do not usually attend such courses. Those who want to become journalists have educational opportunities at home or abroad, and in recent years such opportunities have diversified. A vivid example is the School of Advanced Journalism, a postgraduate training project implemented by the IJC for more than a decade.
- Professionalization is effective only when journalists do their jobs in good faith; however, we often find serious deviations from journalistic norms and codes of conduct generating misinformation and manipulation. In the last election campaign, we witnessed false news and messages of discrimination and incitement to hatred that were widely circulated by some media outlets.
- Although the State University has been in the ATUG for over 20 years, the Faculty of Journalism has managed to prepare only three groups of students. Unlike in Chisinau, usually no short courses are organized for different categories of journalists. There are no professional associations to gather journalists and encourage them to work according to the Journalism Code of Ethics.
- There is a training base for journalists in the Transnistrian region at the State University of Tiraspol, but the teaching methods and the technical equipment leave much to be desired. Some editorial offices propose certain norms of conduct, but they are not always observed. Although the state media are technically well equipped, they often produce propaganda. There are several media NGOs, but their communication with journalists is difficult because the authorities do not welcome such practices.
- Political partisanship is widely spread throughout the press which convincingly demonstrates the inefficiency of the professionalization of the media.
- Professional associations exist in several relevant segments of the media market, but the efficiency of their work varies. Although the need to establish a trade union of journalists has been talked about for several years, it has not happened so far. Likewise, it is necessary to establish a self-regulating advertising institution.

## **Chapter V. Quality of Journalism**

The indicator contains three statements:

1. *There is external pluralism to a great extent, to a large extent, to a small extent, there is no external pluralism.*

2. *There is internal pluralism to a great extent, to a large extent, to a small extent, there is no internal pluralism.*
3. *The media are quality, mostly quality, largely quality, quality to a small extent, there are no quality media.*

The first scored 37 points, the second 28 points and the third 19. The media index was thus 28.00, a **situations with serious problems**.

## 5.1. Chronology

- On 21 January the news and radio agency Sputnik Moldova announced that the towns and cities where it broadcasts (Chisinau, Balti, Cahul, Leova, Ocnita, Tighina, Ungheni, Hincesti, Cimislia and Comrat) in fact provided it national coverage.<sup>53</sup>
- At the end of January, the BCC issued a broadcasting license to the company Honestas LLC for the television channel Axial TV. Representatives of the channel made it clear that the station will be generalist and apolitical in nature and that the broadcast schedule will include up to 95% local programming including news, information and analytical programs, documentaries, programs for children and entertainment programs.<sup>54</sup>
- On 16 March the ATUG regional newspaper "*Весту Газызуу*" marked 20 years of existence. The publication was congratulated by the First Deputy Chairperson of the People's Assembly and the First Deputy Chairperson of the Executive Council of Comrat.<sup>55</sup>
- At the end of March, a new online platform was launched in the media market: [www.report.md](http://www.report.md), a project funded by the Dutch Embassy in Romania. The portal aims to produce news, reports, journalistic investigations and material on European issues as a secure platform for media consumers both in Moldova and abroad. The team of [report.md](http://www.report.md) includes the journalists Vitalie Calugareanu (coordinator of the editorial team), Lilia Zaharia, Natalia Costas and Constantin Uzdris who will be assisted by professional photographer Elena Covalenco. The journalists were selected through a competition and were trained by experienced trainers from Romania.<sup>56</sup>
- On 29 April, the BCC issued a broadcasting license to the public TV channel Moldova 2. Program Director Ilona Spataru said that Moldova 2 will broadcast non-stop on cable and will have national coverage.<sup>57</sup> Moldova 2 was launched on 3 May.
- On 17 May, the BCC approved the application of P.P. "Timpul de Dimineata" for a broadcasting license for Channel 10 TV. The broadcasts were to be made up of local, self-produced programs and programs taken from the Romanian channel Nasul TV. The channel will be broadcast by service distributors in the country.<sup>58</sup>
- On 1 June, a new publication appeared in the media market: the journal "*Cronica*". According to the management of the editorial office, the publication will be a general one and is to appear weekly with a circulation of 45,000 copies. Allegedly no political party or business holding is behind the publication as it relies on advertising and sales. Its team includes journalists experienced in the media: Angela Arama, Arcadie Gherasim and Viorel Pahomi among others.<sup>59</sup>
- On 7 June the BCC summed up the results of the competition for the completion of the available capacity of Multiplex A (3 slots). Of the five applicants—NTV Moldova;

<sup>53</sup><http://aif.md/radio-sputnik-moldova-uslyshit-vsya-strana/>

<sup>54</sup><http://topmedia.md/un-nou-post-de-televiziune-in-moldova-membrii-cca-au-ramas-impresionati---69066.html>

<sup>55</sup><http://www.halktoplushu.md/index.php/novosti/1290-yubilei-gazety-vesti-gagauzii>

<sup>56</sup><http://topmedia.md/un-nou-portal-de-stiri-lansat-in-moldova-proiectul-este-coordonat-de-jurnalistul-vitalie-calugareanu---72200.html>

<sup>57</sup><http://media-azi.md/ro/stiri/%E2%80%9Emoldova-2%E2%80%9D-un-nou-post-public-cu-acoperire-na%C8%9Bional%C4%83>

<sup>58</sup><http://media-azi.md/ro/stiri/ziarul-%E2%80%9Etimpul%E2%80%9D-%C3%AE%C8%99i-deschide-post-de-televiziune>

<sup>59</sup><http://media-azi.md/ro/stiri/pe-pia%C8%9Ba-media-ap%C4%83rut-o-nou%C4%83-publica%C8%9Bie-revista-%E2%80%9Dcronica%E2%80%9D>

Accent TV; Jurnal TV; ITV and RTR Moldova—the three slots were distributed to Accent TV; Jurnal TV and ITV.<sup>60</sup>

- On 27 June, the BCC accepted the request of radio station ”Poli Disc - Русское Радио ” to be renamed ”Poli Disc- Новое Радио”, issued a retransmission authorization for the television studio Vis TV in Grimancauti and Trebisauti villages (Briceni District) for the next term and withdrew the broadcasting license of CFC Vinzari Inteligente LLC, founder of the Fishing & Hunting Premium Channel, after all penalties provided for in the Audiovisual Code had been exhausted.<sup>61</sup>
- On 12 August, the BCC approved the application to extend the broadcasting license of Radio Alla which broadcasts in Chisinau and Balti and takes the news from the Sputnik Agency which is known as a Kremlin propaganda body. The BCC also voted to update the broadcasting license issued to Jurnal TV.<sup>62</sup>
- On 26 August, the editorial office of Sputnik Moldova announced to its readers that a mobile version of the site had been launched. Material on Sputnik Moldova could henceforth be viewed on PDA devices, tablets and smartphones as well.<sup>63</sup>
- On 12 September, Jurnal TV launched a news bulletin in Russian stating that the decision was made at the request of Russian viewers. The bulletin will be broadcast from Monday to Friday after debate programs.<sup>64</sup>
- On 13 September, Channel 10 TV was officially launched in the media market. One of the employees, Constantin Codreanu, said that the aim of the new media project was to provide fair and unbiased information to citizens of Moldova, Romania and the diaspora about realities on both sides of Prut River.<sup>65</sup>
- In late September, the BCC approved the statements of 105 audiovisual companies on covering the presidential election on 30 October 2016.<sup>66</sup>
- On 28 October, the program “Puterea a patra” featuring the mayor of Balti and leader of Our Party Renato Usatii was not broadcast. Moderator Gheorghe Gonta announced on Facebook that the program would not be broadcast, “for ... let's say technical reasons.” The program was, however, posted on the Internet.<sup>67</sup>
- On 18 November, the newspaper *Бесму Газызуу* launched its web page. The publication was founded in March 1996 by the PAG.<sup>68</sup>
- On 5 December, the BCC announced the results of the competition for audiovisual programs addressing topics and issues of public interest whose production would be financially supported by the Radio Broadcaster Support Fund for 2016. The competition featured 20 local radio broadcasters with 27 audiovisual programs. The BCC decided to provide financial support to each winning radio broadcaster for each topic of public interest (TV and radio), allocating 914,650 MDL. The winners were Impuls TV, SOR TV, BAS TV, TV-Drochia, Eco FM Radio, GURINEL TV, Radio Orhei and ELITA TV.<sup>69</sup>
- On 30 December the BCC approved a new radio channel: Radio ONE. According to Program Director Calin Rosca, the new channel will broadcast European, Romanian and Russian music. The programs will be prepared both in Romanian and Russian. The

<sup>60</sup><http://cca.md/news/cca-multiplexului-fost-suplinuit-cu-15-posturi-de-televiziune>

<sup>61</sup><http://cca.md/news/cca-radio-poli-disc-va-fi-radio-poli-disc>

<sup>62</sup><http://unimedia.info/stiri/permalink-119834.html>

<sup>63</sup><http://sputnik.md/moldova/20160826/8770838.html>

<sup>64</sup><http://topmedia.md/jurnal-tv-a-lansat-un-buletin-de-stiri-in-limba-rusa-cum-arata-si-care-sunt-argumentele-postului-tv--video---79219.html>

<sup>65</sup><http://media-azi.md/ro/stiri/%E2%80%9E10tv%E2%80%9D-s-lansat-oficial-pe-pia%C8%9Ba-media-din-r-moldova>

<sup>66</sup><http://cca.md/news/cca-105-radiodifuzori-tv-60-radio-45-vor-reflecta-campania-electoral-la-alegerile-preziden-iale>

<sup>67</sup><http://unimedia.info/stiri/emisiunea-puterea-a-patra--in-care-renato-usatii-a-publicat-inregistrari-telefonice-cu-plahotniuc-si-proca--nu-a-aparut-pe-post-122122.html>

<sup>68</sup><http://gagauzinfo.md/index.php?newsid=29569>

<sup>69</sup><http://cca.md/news/cca-f-cut-bilan-ul-concursului-de-selectare-proiectelor-de-programe-audiovizuale-0>

channel will also broadcast its own material and will also retransmit programs from abroad.<sup>70</sup>

## 5.2. Expert Opinion and Assessment

Regarding the external and internal pluralism of the media and the quality of media products, the experts noted the following.

- In the last two to three years, external pluralism has developed so that there are media outlets for various audiences according to age, interests, professional fields, etc. For example: Bizlow.md features legal/lawyers' interests; Anticorupție.md, Moldovacurata.md, and Zdg.md highlight anti-corruption/integrity in the public sector; E-sanatate discusses medicine; Agro TV and Agrobiznes.md are devoted to agriculture; Moldova Sport TV covers sports and Diez.md and Zugo.md are for young people.
- There is a diversity of media outlets, but we note a concentration of them in Chisinau. Almost 2/3 of the more than 120 radio and TV broadcasters are established in the capital.
- The issue of external pluralism is particularly acute in the audiovisual field. The current practice of the BCC of organizing and conducting competitions for license seekers does not meet the diversity and pluralism of interests of society.
- Although there are all types of media in the ATUG, there is no concept for the development of external media pluralism. There are also major problems in terms of the proportion of local content. In legislative terms, even if certain amendments are adopted, they usually concern the regional public radio and TV broadcaster.
- Media diversity should be strengthened by creating community and niche (specialized) media. For this purpose legislative requirements shall be established and proper conditions shall be ensured.
- In the Transnistrian region, only 20% of the media are private and therefore we cannot speak of external pluralism.
- In Moldova there are no blacklists of TV and radio channels as there are in Ukraine, for example. Information is accessible by air, cable networks, via print media and online, so there is external pluralism.
- It is difficult to talk about pluralism if the media are divided into "ours" and "yours."
- The level of internal pluralism is lower. An editorial agenda for the press is largely missing. Journalists are mostly guided by the agenda of politicians.
- We have few media outlets that tend to be high quality. Internally, in very few editorial offices do reporters do what they think is necessary; most often they do what is dictated by the owner.
- There are media products made in accordance with professional and technical norms; however, the perception of the media is highly compromised by deviations from professional norms, norms on propaganda, misinformation, manipulation etc. Effective media education could obviously change this perception.
- Media products often lack background. Authors make only official declarations. Competition and the rush to be "the first" encourage editors to broadcast unverified news or to post it on line.
- In the past two to three years, the number of investigations has increased, but they can be read mostly in the press and, in fact, they are missing in the programs and

---

<sup>70</sup>[http://www.realitatea.md/un-nou-post-de-radio-va-fi-lansat-in-curand--in-moldova---radio-one\\_50502.html?utm\\_source=topmedia.md&utm\\_medium=feed&utm\\_campaign=rss&utm\\_content=topmedia.md](http://www.realitatea.md/un-nou-post-de-radio-va-fi-lansat-in-curand--in-moldova---radio-one_50502.html?utm_source=topmedia.md&utm_medium=feed&utm_campaign=rss&utm_content=topmedia.md)



programming schedules of TV and radio stations. In many cases the press reprints investigations by specialized NGOs. The audiovisual press avoids doing this.

- Inside each press outlet regardless of its type, the diversity of media products is insufficient. The media are largely concerned about covering political events. The press in the capital rarely publishes news and/or stories about protagonists in the districts. Likewise, only a few institutions have specialized in carrying out journalistic investigations while others almost completely ignore this genre.
- Most media outlets are based in Chisinau and reflect the realities of the capital only; media products covering life outside Chisinau municipality are an exception. Diversity of media products is reduced to information products and debate programs.
- The media outlets controlled by politicians and/or businessmen connected to party leaders often breach ethical norms by supplying misinform and manipulating public opinion. Meanwhile, independent media try to comply with the Journalism Code of Ethics; even if they admit deviations, usually they quickly correct them.
- Even the institutions that set the tone for propaganda (Sputnik for instance) have different voices. The unionist Mihai Ghimpu is on the news tape here almost every day. Is this pluralism? Maybe, in terms of number. If we analyze the context in which external sources are placed, we see that the purpose is other than to ensure pluralism of opinions. This situation is common in most editorial offices in Moldova.
- The issue of media quality has two aspects. On the one hand, there are large editorial offices in which journalism is limited to running with microphones after heroes, and on the other hand there are smaller editorial offices where products are fewer in number, but they can be assessed as quality journalism. Not only covering events minute by minute or balancing sources make quality media products. Unique topics, interests behind populist declarations and investigations also make authentic, quality journalism.
- Some media provide various journalistic genres—news, reports, comments, analysis, interviews, multimedia products—to the public for different groups of beneficiaries. The percentage of quality media is very low; we have a great deal of manipulative and propagandistic information as certified by monitoring reports of media organizations, including during election campaigns.
- Regarding internal pluralism, we observed that even in 2016 some media outlets still followed the tendency to invite and cite as experts the same characters. For example, a monitoring report the BCC prepared from 18 January to 18 February 2016 showed that most of the invitees (politicians) on the program “Replica” on Prime TV were representatives of the DP with 57,14 % or four appearances followed by representatives of the PL with 28, 57 % or two appearances and the TDP with 14, 29 % or one appearance. The situation was similar at Publika TV where on “Fabrica,” the DP enjoyed five appearances, the PL three appearances and the Popular Party of the Republic of Moldova and the PPCUM two appearances each. A similar trend was noted in terms of political figures and commentators. On the TV channels monitored during the same period, most invitees were men. For example, on Publika TV the ratio was 90.24% men to 9.76% women.
- Regardless of ownership, the media outlets in ATUG try to develop internal pluralism, but not all succeed. The share of analytical journalistic products and, in particular, investigations is still very low. Quality journalism can be provided by professionals, but few of graduates from faculties in Chisinau go back to the Autonomy. Also, journalists are not offered attractive salaries. This is why some professionals prepare material paid for by a party. Although cable operators earn money from subscriptions, they create their own programs for political customers.

- Transnistrian media products, especially audiovisual ones, are diversified to an extent, given the journalistic genres available, geography and the protagonists.
- Excessive politicization of the media seriously affects the editorial policy of most influential media because of economic and political control.
- In many cases, the share of political issues is unreasonably high. Although formally there are no party press bodies (the law prohibits political parties from owning television stations), for election purposes some TV channels are in fact outlets for transmissions, promotions and the propagation of political parties, their leaders and their positions on various issues. The channels concerned also often carry out campaigns to discredit and defame opponents of the parties concerned.

## Chapter VI. Information Security

The indicator contains two statements:

1. *There are local media outlets in the information space that fully contribute, mostly contribute, largely contribute, contribute to a small extent, do not contribute at all to strengthening information security.*
2. *There are local media outlets in the information space that do not affect, affect to a small extent, to a large extent, to the largest extent, fully affect information security.*

The first scored 23 points and the second 21 points for an index of 22.00 points which corresponds to a **serious situation**.

### 6.1. Chronology

- On 9 March, the IJC launched the information portal [mediacritica.md](http://mediacritica.md) to combat propaganda and manipulation in the press and to develop critical thinking among media consumers in Moldova.<sup>71</sup>
- In the middle of March, the press agency IPN published the first case study from a project designed to expose politicians and opinion makers when they lie and manipulate. The study was made available on the project page, [sic.md](http://sic.md)<sup>72</sup>.
- On 7 April, the Chisinau Court of Appeals left in force the BCC decision of 27 May 2015 on halting the broadcasts of TV channel Russia-24 throughout Moldova. The BCC invoked lack of pluralism, promotion of Russian policies and the need to protect Moldovan information space. The BCC decision was challenged in court by former MP Grigore Petrenco.<sup>73</sup>
- At the end of June, the regional network of self-regulatory media organizations started to examine serious cases of transmitting propaganda from eight countries: Armenia, Azerbaijan, Georgia, Moldova, Ukraine, Belarus, the Russian Federation and Tajikistan. The first meeting of the regional network was held in the Georgian capital Tbilisi.<sup>74</sup>
- On 26 August, the editorial office of Sputnik Moldova announced the launch of the mobile version of its website to its readers. “Type [m.ru.sputnik.md](http://m.ru.sputnik.md) (in the Russian version), [m.md.sputnik.md](http://m.md.sputnik.md) (in the Moldovan version) or [m.ro.sputnik.md](http://m.ro.sputnik.md) (special

<sup>71</sup><http://trm.md/ro/social/cji-a-lansat-un-portal-informativ-despre-combaterea-propagandei-si-manipularii-din-pres/>

<sup>72</sup><http://ipn.md/ro/special/75321>

<sup>73</sup><https://point.md/ru/novosti/politika/ap-ostavila-v-sile-reshenie-suda-o-zaprete-veschaniya-rossiya-24>

<sup>74</sup><http://www.ipn.md/ro/societate/77468>

Moldova-Romania project) and your telephone or tablet will automatically access the mobile version of the website.”<sup>75</sup>

- On 22 September, Prime Minister Pavel Filip had talks in New York with Richard Stengel, the Under Secretary for Public Diplomacy and Public Affairs of the US State Department. The discussion included new areas of cooperation within the Moldovan-American bilateral dialogue, and the Prime Minister proposed including information security and the protection of the information space and the media in Moldova.<sup>76</sup>
- In early October, the government approved the Concept of Information Security with the stated aim of protecting the interests of individuals, society and the state in the field of information and of providing information security for society.<sup>77</sup>
- On 5 December, NATO and the EU adopted a set of proposals to implement the Joint Declaration adopted at the Warsaw Summit in July including establishing a European Center for Countering Hybrid Threats in 2017.<sup>78</sup>
- In December, the media program at the Soros-Moldova Foundation completed the study “Information Security from the Media Perspective”<sup>79</sup> developed by nine experts from Moldova.

## 6.2. Expert Opinion and Assessment

Regarding the information security of the country from the media perspective, the experts noted the following.

- According to the BCC, 70% of TV channels transmitted in Moldovan information space are from the Russian Federation and promote policies often focused on anti-European, anti-national messages using propaganda, manipulation and misinformation. The lack of serious studies on the effects of these practices and the lack of effective state policies to counteract them threaten the information security of Moldova even more.
- Even if the information space of Moldova is secured by regulations for license holders regarding retransmitted programs, a large amount of false information encouraging interethnic hatred, separatism, etc. broadcast by Russian TV channels or online resources reaches the public.
- Moldovan media space is polluted with misinformation. Manipulation is on the agenda. There is no social immunity against propaganda as proven by the recent elections in Moldova.
- Many media companies redistribute foreign audiovisual products of poor quality, including news and programs that undermine the information security of the country by promoting intentionally false and distorted information about realities in Moldova, the region and the world in an effort to influence the mentality and vision of Moldovan citizens, including their choices in elections.
- Unlike other states, Moldova is passive. In March, for example, the Latvian authorities announced that they were closing the local version of the media website Sputnik which had distributed pro-Kremlin information. In April, Turkey also closed access to the pro-Kremlin agency Sputnik, and in May the Czech government announced its intention to create a center to counter the influence of foreign propaganda. Even in Russia some media outlets are concerned about scale of propaganda. In June, for instance, the

<sup>75</sup><http://sputnik.md/moldova/20160826/8770838.html>

<sup>76</sup><https://point.md/ru/novosti/politika/pavel-filip-vstretilsya-s-zamestitelom-gossekretyarya-ssha-richardom-stengelem>

<sup>77</sup><http://deschide.md/ro/stiri/politic/1515/Contracararea-r%C4%83zboiului-informa%C8%9Bional-Guvernul-a-aprobat-%E2%80%9EConcep%C5%A3ia-securit%C4%83%C5%A3ii-informa%C5%A3ionale%E2%80%9D.htm>

<sup>78</sup><http://deschide.md/ro/stiri/externe/4116/NATO-%C8%99I-UE-vor-%C3%AEnfiin%C8%9Ba-un-centru-pentru-a-lupta-contr-%E2%80%9Er%C4%83zboiului-hibrid%E2%80%9D.htm>

<sup>79</sup><http://soros.md/publication/securitate-informationala-perspectiva-media-studiu>

Alliance of Independent Regional Publishers of Russia launched a campaign against NTV and “Rossia” channels. The TV schedule published in regional newspapers was accompanied by a note opposite the logo NTV or Rossia informing readers that under the guise of journalistic material on these channels, TV viewers could be provided with distorted information or propaganda. In Moldova, however, everything is “OK.”

- In the ATUG, regional media can barely protect the security of their information space as local content is minimal, especially on cable where foreign channels prevail. Many of them also transmit manipulative information, but censorship is not the answer.
- Even if most frequencies assigned to broadcasters are subject to Moldovan jurisdiction, the legislation in force allows holders of licenses to retransmit a large amount of foreign programming; there is no ongoing effort to increase the amount of domestic programming. The quality and/or nature of programs broadcast contribute to only a small extent to strengthening the information security of the state.
- Purchasing TV movies is an indirect consequence of the permission granted by broadcasters to retransmit programming. In fact, talking about information security in light of purchasing television movies is nonsense.
- Foreign media in terms of number and/or influence (audience size) are especially numerous; the language of broadcasts is not the state language.
- The excessive concentration of audiovisual media ownership is automatically a challenge to the information security of the state. It undermines the pluralism and the diversity of the press. Economic and political dependence is still a black ball for information security.
- Foreign experts consider that propaganda could be counteracted by strengthening domestic products, but in terms of state policy almost nothing is being done in this regard. Exceptions are the BCC competitions for funding projects.
- Attempts by the authorities to protect Moldovan information space against the invasion of Russian propaganda failed. The bill proposed by MPs was criticized by international organizations and by civil society and was not approved.
- Ensuring the information security of Moldova is, above all, the obligation of state authorities. A clear regulation in this regard would help balance the struggle because national editorial offices are not able today to cope with the wave of propaganda from Moscow. Even the in the TV package offered to citizens by Moldtelecom, a state company (!), the share of retransmitted eastern channels is almost 80%. Thus, we face a ridiculous situation when the Prime Minister complains in the overseas press about Russian propaganda in Moldova and requests help from the West to combat it while public institutions in the country issue new licenses to the well-known propaganda channels (RTR, ORT, NTV, etc.), and his party leader even retransmits some of them.
- In February 2016, the BCC monitored the programs of the television channel REN TV Moldova, including the program *Военная тайна* broadcast on 30 January 2016 and then again on 1 February 2016. The monitoring results showed that station deviated several times from the Audiovisual Code and the Code of Conduct for Radiobroadcasters. These trends were felt even more during the presidential elections in the autumn of 2016 when following the election results, the Russian press headlined: “Chisinau is ours.” Foreign media thus continue to affect the information security of Moldova.
- In the Transnistrian region, the products of state media are first checked by the special services of the region.
- In Moldovan media, particularly on television, there is a curious phenomenon: The larger the amount of domestic programming, the greater the risk of bankruptcy. It happens because under the current legislative framework, fair competition with

television channels that include or retransmit a large amount of foreign programming is impossible, and therefore Moldovan information space is constantly in danger.

- At the state level, there is no adequate campaign for media literacy; NGOs are the only ones concerned about critical thinking among media consumers. Overall, these elements create a lack of social immunity against information propaganda for most Moldovans; the results of the last presidential elections confirmed this.

## Chapter VII. Safety of Journalists

The indicator contains two statements:

1. *Journalists do their jobs in safety in all cases, absolutely in most cases, in most cases, in some cases, do not did their jobs in safety.*
2. *The work of journalists does not entail any consequences, entails mild consequences, consequences of moderate severity, severe consequences, very severe consequences.*

The first scored 33 points and the second 39 points for an index of 36.00 points which corresponds to a **situation with serious problems**.

### 7.1. Chronology

- On 22 January, the Buiucani Prosecutor's Office initiated a criminal case based on the complaint lodged by the cameraman of the news portal Today.md claiming that he had been assaulted and deprived of his video camera while filming violent protests in front of the Parliament building on 20 January.<sup>80</sup>
- On 15 February, journalists from Publika TV were assaulted and insulted at the protest in front of Riscani Court organized Our Party and the Dignity and Truth Platform.<sup>81</sup>
- On 30 March, GRT employees addressed an open letter to the BCC complaining that they had been subjected to pressure and that their freedom to exercise their professions as journalists was threatened, after which the Bashkan of Gagauzia enacted the Audiovisual Law of the ATUG.<sup>82</sup>
- On 20 April, members of the national movement Statalitate said at a press conference that the actions of the management of public TV channel Moldova 1, "...are part of a criminal plan that has been made public several times by members of Unirea-2012 and the so-called Sfatul Tarii 2. We appeal to the PGO, the SIS, the BCC and the Court of Accounts to halt the crimes of the leadership of Moldova 1 against the state and the Moldovan people immediately."<sup>83</sup>
- On May 3 during Press Freedom Days, journalists and media organizations protested at the Embassy of Azerbaijan in Moldova demanding the release of Azerbaijani journalist Khadija Ismayilova who was arrested in Baku for carrying out several investigations. A banner was hoisted with the message Free Khadija! A representative of the embassy demanded its removal and the identities of the makers and hoisters of the banner.<sup>84</sup>
- On 6 May, media NGOs reacted publicly to clashes in the Great National Assembly Square between a group of protesters and a journalist from Today.md.<sup>85</sup>

<sup>80</sup>[http://www.realitatea.md/cazul-agresarii-unui-cameraman-la-protestul-de-miercuri-de-la-parlament-cercetat-penal\\_33301.html](http://www.realitatea.md/cazul-agresarii-unui-cameraman-la-protestul-de-miercuri-de-la-parlament-cercetat-penal_33301.html)

<sup>81</sup><http://topmedia.md/jurnalisti-publika-tv--agresati-si-injurati-la-protestul-din-fata-judecatoriei-riscani--video-necezurat--70188.html>

<sup>82</sup>[http://www.realitatea.md/anqajatii----qaqauziva-radio-televizionu----se-planq-cca--jurnalistii-sunt-supusi-presiunilor-si-le-este-amenintata-libertatea-de-a-si-exercita-profesia\\_36872.html](http://www.realitatea.md/anqajatii----qaqauziva-radio-televizionu----se-planq-cca--jurnalistii-sunt-supusi-presiunilor-si-le-este-amenintata-libertatea-de-a-si-exercita-profesia_36872.html)

<sup>83</sup><http://deschide.md/ro/news/social/26583/Mi%C8%99care-%E2%80%9EStatalitate%E2%80%9D-condamn%C4%83-promovarea-unionismului-la-Moldova-1.htm>

<sup>84</sup>[http://radiochisinau.md/politizarea\\_si\\_concentrarea\\_presei\\_cele\\_mai\\_grave\\_probleme\\_ale\\_mass\\_media\\_din\\_r\\_moldova-33153](http://radiochisinau.md/politizarea_si_concentrarea_presei_cele_mai_grave_probleme_ale_mass_media_din_r_moldova-33153)

<sup>85</sup><http://media-azi.md/ro/stiri/declara%C8%99Bie-onq-unilor-de-media-%C3%AEn-leq%C4%83tur%C4%83-cu-alterca%C8%99Bile-dintre-un-grup-de-protestatari-%C8%99>

- On 30 May, the Security Committee of the Transnistrian region officially confirmed in a letter that for a long time it had blocked access to a number of news portals and websites of NGOs, "...to protect the morality, health, rights and legitimate interests of citizens." The letter from the KGB in Tiraspol addressed to the Chairperson of the Supreme Soviet was published on social networks by the Transnistrian journalist Andrei Safonov.<sup>86</sup>
- On 17 June, the Supreme Soviet of Tiraspol adopted amendments to the Criminal Code of the breakaway region in the second reading establishing criminal punishment for denying the positive role of the Russian peacekeeping mission in the Transnistrian region. Thus, any public actions or statements including through the media, on social networks or on the Internet expressing a clear lack of respect for the peacekeeping mission of Russia and aiming to distort its positive role would be punished with a fine of 500—1,000 conventional units or by imprisonment for up to three years.<sup>87</sup>
- In July, the website [bizlaw.md](http://bizlaw.md) wrote that the Chairman of Parliament had sued television station Jurnal TV for harming his honor, dignity and professional reputation in an item broadcast in February. The official asked for 30,000 euros in damages.<sup>88</sup>
- On 13 July, journalist Natalia Morari announced on the program "INTERPOL" that she moderates on TV7 that she had received several messages warning her that some institutions in the country were preparing actions against her to silence her.<sup>89</sup>
- In the middle of July, media NGOs made public their opinion about the case of a reporter (Mariana Colun) from the Center for Journalistic Investigations. The reporter sent several requests for information to the MIA, asking among other things for a comment on a possible case of corruption allegedly admitted by some policemen at an improvised market near the railway station. Instead of answering, she received a summons to be questioned, "...in connection with the examination of material on the provision of information about allegedly unlawful actions of policemen." At the same time, the reporter was warned that if she did not come to the MIA at the time specified in the summons, she could be fined or brought there under compulsion.<sup>90</sup>
- On 15 July, media NGOs protested the intimidation of journalist Vadim Sterbate, a reporter from the newspaper *Observatorul de Nord* from Soroca, by Deputy Defence Minister, Alexandru Cimbriciuc. After publishing the article "[\(De\)gheretizarea oraşului Soroca?](#)" in which the issue of buildings spoiling the appearance of the city, including a kiosk that belonged to the son of the Deputy Minister located very near Soroca Fortress, was raised, the editorial office and its employees were intimidated in various ways. Initially, the kiosk was moved in front of the office of *Observatorul de Nord*, and later Mr Cimbriciuc asked the Military Commissariat in Soroca to check whether Mr Sterbate had registered for military service or was actively training at a military installation.<sup>91</sup>
- On 21 July, the Security Service of Parliament withdrew the accreditation of a journalist from the portal Newsmaker.md because she, "...left the specially arranged place for the press," and entered the session hall of Parliament. There the journalist asked the Chairman of Parliament a question. After she received an answer, security service officials approached her and asked her to turn over her accreditation and ID card. Later, her identity card was returned but her accreditation was not.<sup>92</sup>

<sup>86</sup><http://deschide.md/ro/news/social/27857/KGB-ul-transnistrean-blocheaz%C4%83-site-urile-opozan%C8%9Bilor-lui-%C8%98evciuk.htm>

<sup>87</sup><http://www.europalibera.org/a/27805301.html>

<sup>88</sup><http://deschide.md/ro/news/politic/28617/Candu-cere-prin-judecat%C4%83-30-000-%E2%82%AC-de-la-Jurnal-TV.htm>

<sup>89</sup><http://topmedia.md/jurnalista-natalia-morari--amenintata-politia-va-investiga-declaratiile--dar-spune-ca-trebuie-sa-fie-depusa-o-plangere-din-partea-victimei-video--77029.html>

<sup>90</sup><http://media-azi.md/ro/stiri/condamn%C4%83m-abuzurile-mai-fa%C8%9B%C4%83-de-o-reporter%C4%83-centrul-de-investiga%C8%9Bii-jurnaliste>

<sup>91</sup><http://media-azi.md/ro/stiri/organiza%C8%9Bile-neguvernementale-de-media-protesteaz%C4%83-%C3%AEmotriva-intimid%C4%83rii-jurnalistului-vadim>

<sup>92</sup><http://unimedia.info/stiri/un-jurnalista-ramas-fara-acreditare-in-parlament--motivul-i-a-adresat-o-intrebare-speakerului-candu-in-sala-de-sedinte-118668.html>



- On 2 August, journalist Constantin Cheianu announced that, “Last night someone shot through the window of the apartment where my daughter lives.”<sup>93</sup>
- On 3 August, a reporter from Jurnal TV was assaulted by a sympathizer of Orhei mayor Ilan Shor. The incident occurred at the Court of Appeals where a meeting was underway to examine the appeal of Shor’s lawyers requesting his release from custody. During an interview, the reporter (Adrian Prodan) was attacked by a Shor sympathizer. Outraged and angry, the woman began cursing and hitting the reporter and the microphone of Jurnal TV.<sup>94</sup>
- On 27 August, journalist and member of the Dignity and Truth Platform Vasile Nastase was summoned by the Cimislia Police Inspectorate because in June during a meeting with supporters of the platform in Cimislia, he allegedly had physically assaulted Vadim Ungureanu, a reporter from the news portal Today.md.<sup>95</sup>
- On 2 November, Victor Sofroni, director of local television station Impuls TV in Soldanesti, said he was intimidated by Cazimir Trocin, the Chief of the District Police Inspectorate after journalists investigated several cases of violations committed by local law enforcement bodies. Mr Sofroni stated that because the reports allegedly tarnished the image of policemen, Mr Trocin threatened revenge on Sofroni’s brother, who is the administrator of the enterprise Apa- Soldanesti.<sup>96</sup>
- In early November, three cases were filed in court against Nicolae Buceatchi, editor-in-chief of the publication *Человек и его права* in the Transnistrian region,<sup>97</sup>
- On 11 November, Gheorghe Gonta, journalist and presenter of the program “Puterea a patra” on TV channel N4, announced his resignation. Problems arose after the journalist had to cancel a show whose invitee was Renato Usatii, the leader of Our Party.<sup>98</sup>
- On 15 November, the PSRM sued RISE Moldova for the investigation “Money of Dodon in the Bahamas” claiming 10,000 MDL in damages and demanding the publication of a denial. It should be noted that on October 4, the PSRM had sent the RISE editorial office a request to repudiate the information or it would sue.<sup>99</sup>
- On 15 November, the Promo-LEX Association reported several cases of intimidation of journalists in the Transnistrian region. Freelancer Natalia Scurtul was summoned by an order of the militia in Tiraspol for expressing personal opinions at TSV (Televedenie Svobodnogo Víbora), a private television station in the region. After interrogating her, militia representatives told her that they would not initiate an investigation as she was not an employee of TSV and thus was not administratively responsible. The founders of TSV are representatives of the Sheriff Company that finances the party Obnovlenie that is considered to be in opposition to the current leader, Evgheni Sevciuk. Also on 12 November, militia representatives tried to prevent a young man from Bender from distributing the newspaper *Человек и его права*.<sup>100</sup>
- After the presidential elections in the Transnistrian region, social networks and commercial TV channels disseminated the news that state television had been harassed by the new leader of the breakaway region, including that the equipment of the institution had been removed. Nina Stanski, the wife of the former Transnistrian President, wrote on Facebook: “The newly elected head of the region said he did not want to fight journalists or seek revenge. He is terrorizing those from PGTRK (state TV station Perviy Pridnestrovskiy) the second day already. Those from the Supreme

<sup>93</sup><http://www.jurnal.md/ro/social/2016/8/2/jurnalitul-constantin-cheianu-amenintat-din-nou-noaptea-trecuta-s-a-impuscat-in-qeamul-apartamentului-in-care-locuieste-fiica-mea-foto/>

<sup>94</sup><http://www.jurnal.md/ro/social/2016/8/3/reporter-jurnal-tv-agresat-in-timpul-unui-protest-in-sustinerea-lui-shor-de-un-simpatizant-al-primarului-de-orhei/>

<sup>95</sup><http://www.jurnal.md/ro/social/2016/8/27/jurnalitului-vasile-nastase-i-s-a-intentat-dosar-penal/>

<sup>96</sup><http://www.jurnal.md/ro/social/2016/11/2/directorul-postului-local-de-televiziune-din-soldanesti-sustine-ca-este-intimidat-de-politisti/>

<sup>97</sup><https://www.youtube.com/watch?v=zzXURb0eY6c>

<sup>98</sup><http://unimedia.info/stiri/dupa-opt-ani-de-n4--gheorghe-gonta-a-anuntat-ca-pleaca-cineva-incearca-sa-mi-afecteze-imaginea-123064.html>

<sup>99</sup><http://unimedia.info/stiri/psrm-a-actionat-in-judecata-rise-moldova-pentru-investigatia-banii-lui-dodon-din-bahamas--cer-10-000-de-lei-si-dezmintire-123284.html>

<sup>100</sup><http://media-azi.md/ro/stiri/promo-lex-sesizeaz%C4%83-%C3%AEn-regiunea-transnistrean%C4%83-continuu%C4%83-intimidarea-jurnal%C8%99tilor>

Soviet came and threatened them with imprisonment. The premises were surrounded by police, although it's not clear what the police have to do with this.’<sup>101</sup>

- On 22 December, the lawyer (Iulian Balan) of a candidate for the PAG (Vitalii Dragoi), who challenged the loss of his election in court, asked the court to sanction the portal Gagauzinfo.md because it transmitted an online report from the session of Comrat Court of Appeals in which several witnesses were heard. The lawyer based his request on the fact that witnesses could be subjected to pressure. The court rejected the request on the grounds that the sessions were public.<sup>102</sup>

## 7.2. Expert Opinion and Assessment

Regarding the safety of journalists, the experts noted the following.

- The media in Moldova live in an atmosphere of self-censorship so they don't get into trouble and are able to continue their work in some fashion. There were serious cases in which journalists were attacked, but as for media attacks, some reporters doing their jobs honestly were unfortunately defamed quite often.
- In most cases journalists do their jobs in safety; however, there were also some exceptions such as bullying a journalist from Today.md whose behavior was challenging from the outset.
- There were no known cases in which the work of journalists entailed consequences, even when some followed political orders by denigrating and defaming certain people. Apparently, the lack of confidence in the independence of the judiciary in Moldova discourages citizens from defending their honor and dignity.
- There was bullying and intimidation; however, we cannot say that the work of journalists in Moldova is dangerous.
- Journalists in ATUG work in relative safety. There are cases when an investigation entails threats or verbal aggression, but there is no institution in the Autonomy that counts or analyzes such incidents and proposes solutions. Journalists tend to abandon their professional duties and engage in politics.
- In 2016, there were cases of intimidation of journalists in the Transnistrian region on the part of law enforcement bodies. Papers were forged with signatures of persons who did not know that they had signed a summons for a journalist. Some journalists were detained, and their families were pressured. Also, there were cases when militiamen took newspapers with critical information about the authorities out of mailboxes.
- In doing their jobs, journalists were often intimidated, threatened and even physically attacked with minor consequences. Most often, however, the threats were followed by concrete actions by the perpetrators.

## General Conclusions

The overall MSI for 2016 was 26.66 which indicates a **serious situation** for the media in Moldova. The most affected areas identified by the MSI are the political context followed in terms of severity by the economic environment and the security of media space as part of the security of national information space.

**Indicator I: Legal framework regulating media activity.** The score of 28.66 indicates a serious situation for the media. During the reporting period, no improvement in the legislative

---

<sup>101</sup><http://unimedia.info/stiri/sotia-lui-Sevciuk-primul-post-de-televiziune-national-este-terorizat-de-catre-proaspatul-presedinte-al-regiunii-124798.html>

<sup>102</sup><http://gagauzinfo.md/index.php?newsid=30213>

framework was noted; the only act amended was the Law on Access to Information. Despite the commitments assumed by the government, a new audiovisual code has not been adopted. Currently there are no separate regulations that distinguish generalist from thematic services in audiovisual programming. In addition, there are no special regulations for local/regional radio and TV broadcasters, for community media, for online media or for the press and that can be adjusted to current realities. Some current legislation is not consistent with international standards, and the legal framework is applied selectively.

**Indicator II: Political context.** The score of 14 for this indicator points to an extremely serious situation for the media. The main reasons are the extensive involvement of politicians in media as a result of major political events during the reporting period (elections in Chisinau, Comrat and Tiraspol); the involvement of political forces in the work of audiovisual regulatory authorities; the ownership of important and influential media outlets—mainly audiovisual institutions—by politicians; the actual imposing of a political agenda on a large number of media outlets and using the media for political purposes among others.

**Indicator III: Economic environment.** The media is in a serious situation in this regard as the score of 18.5 indicates. Neither the legislation, nor the economic situation fosters the financial independence of the media that would ensure their editorial independence as well. The legislation does not provide for limiting the concentration of ownership in media or for accessing commercial advertising by media outlets. In addition, there are dominant positions in the media and advertising markets that create unfair competition, but the authorities actually responsible accept this state of affairs. Media funded by a political party have the best financial situations. In such cases, editorial independence is impossible.

**Indicator IV: Professional environment.** Moldovan media also have serious problems in this area (score of 31.5). While the main elements of professionalization are present in Moldova (common body of knowledge in journalism, institutions training journalists, associations of journalists, a code of ethics, a code of conduct for broadcasters), there are still many concerns about the efficiency of the process that are related to the disconnect between training and market needs; the quality of academic staff; disregard in many cases for professional rules prescribed by codes and the failure to create trade unions.

**Indicator V: Quality journalism.** The score of 28 highlights the serious problems Moldovan media have in this respect. During the reporting period, several media outlets appeared in the market contributing to strengthening the diversity of the media (external pluralism), but there were also serious problems related to the diversity of media products (internal pluralism) and their quality. Most often, national outlets do not cover issues in rural areas. The political affiliation of many outlets generates propaganda and manipulation and misinformation. Political topics are assigned excessive importance while topics of real public interest are disregarded.

**Indicator VI: Information security from a media perspective.** The score of 22 for this indicator indicates a serious situation. An avalanche of outside information was able to erode state security, but this avalanche is accepted and even supported by government institutions. From inside, threats come from media disseminating manipulative information or when major outlets are owned by politicians. Such hazards make lack of security unavoidable. Information security from a media perspective can be efficiently ensured through quality journalism and media consumer education. During the reporting period, however, the state did not demonstrate a desire to secure nation's information space.

**Indicator VII: Safety of journalists.** This is a situation affected by serious problems as indicated by the score of 36. Although journalists largely perform their missions in safety,

there were cases when they were prevented from performing their duties. There were several cases when journalists were either threatened or assaulted verbally or physically or when their equipment was damaged or when court cases were instituted against them. Such actions, in the opinion of the experts, have a single purpose: to intimidate the media to make them more obedient especially of the authorities. The challenging behavior of some journalists was taken into account.

## **Recommendations**

- Improve and supplement the existing legal framework with provisions consistent with international standards. Responsible parties should enforce the existing framework and the improved and supplemented framework efficiently and in good faith.
  - Establish democratic norms for audiovisual institutions to depoliticize the media and to prevent dominant positions.
  - Establish additional regulations for local/regional broadcasters.
  - Establish regulations for community broadcasters.
  - Develop the definition and the status of online media.
- Abandon the political interference in the media that is obvious in the appointment of members of the regulatory and supervisory authorities based on political criteria and in politicians owning/subordinating important/influential media outlets.
- Supplement economic legislation with explicit provisions on media businesses to establish special limits for ownership of media outlets and for the access of media outlets to commercial advertising to ensure fair competition in both the media and the advertising markets.
- Eliminate the reliance of media outlets on opaque sources of funding and ensure their economic independence in order to ensure their editorial independence for the benefit of society.
- Tailor the curricula of training institutions to the needs of the media and implement trade unions.
- Establish and comply with self-regulatory norms in online media.

Encourage the development, promotion and observance of the codes of ethics in all media outlets.

- Strengthen external and internal pluralism in the media; encourage democratic journalism in every way possible and discourage party and “customized” journalism.
- Develop and implement actions to secure media space, above all through extensive policies aimed at increasing the volume and quality of local media products and by requiring a media consumer education course in the educational system.
- Increase the safety of journalists by monitoring all occasions when they are prevented from performing their duties centrally, locally or regionally; by thoroughly covering

and widely circulating the coverage of each case and by carefully monitoring settlements by competent authorities.

*Annex 1*

| <b>Indicators</b>                            | <b>Statements</b>   | <b>Points</b> |
|--|---|---------------|
| <b>I. Legal framework for media activity</b> | 1.1. Media legislation is sufficient, mainly sufficient, largely sufficient, to a limited extent sufficient, insufficient                           | 4, 3, 2, 1, 0 |
|  | 1.2. Media legislation is compliant with international standards, mainly compliant, largely compliant, compliant to a limited extent, non-compliant | 4, 3, 2, 1, 0 |
|  | 1.3. The legislation is applied correctly every time, most often, often, rarely, never or almost never  | 4, 3, 2, 1, 0 |
| Total Indicator I:                           |   |               |
| <b>II. Political Context</b>                 |   |               |
|  | 2.1. The political situation is favorable to media activity, mainly favorable, largely favorable, favorable to a limited extent, unfavorable        | 4, 3, 2, 1, 0 |
| Total Indicator II:                          |   |               |
| <b>III. Economic Environment</b>             |   |               |
|  | 3.1. The media are economically independent, to a large extent, to a medium extent, to a small extent, are not independent                          | 4, 3, 2, 1, 0 |
|  | 3.2. The media are editorially independent, to a large extent, to a medium extent, to a small extent, are not independent                           | 4, 3, 2, 1, 0 |
| Total Indicator III:                         |   |               |
| <b>IV. Professional Environment</b>          |   |               |
|  | 4.1. Media professionalization is sufficient, mostly sufficient, largely sufficient, sufficient to a small extent, insufficient                     | 4, 3, 2, 1, 0 |
|  | 4.2. Media professionalization is efficient, mostly efficient, largely efficient, efficient to a small extent, is not efficient                     | 4, 3, 2, 1, 0 |
| Total Indicator IV:                          |   |               |
| <b>V. Quality of Journalism</b>              |   |               |
|  | 5.1. There is external pluralism, to a great extent, to a large extent, to a small extent, there is no external pluralism                           | 4, 3, 2, 1, 0 |
|  | 5.2. There is internal pluralism, to a great extent, to a large extent, to a small extent, there is no internal pluralism                           | 4, 3, 2, 1, 0 |

|  |  |               |
|--|--|---------------|
|  | 5.3. The media are high quality, mostly high quality, largely high quality, high quality to a small extent, there are no high-quality media  | 4, 3, 2, 1, 0 |
| Total Indicator V:                                       |  |               |
|  |  |               |
| <b>VI. Information Security from a Media Perspective</b> | 6.1. There are local media outlets in the information space that fully contribute, mostly contribute, largely contribute, contribute to a small extent, do not contribute at all to strengthening information security | 4, 3, 2, 1, 0 |
|  | 6.2. There are local media outlets in the information space that do not affect, affect to a small extent, to a large extent, to a great extent, fully affect information security                                      | 4, 3, 2, 1, 0 |
| Total Indicator VI:                                      |  |               |
|  |  |               |
| <b>VII. Safety of Journalists</b>                        | 7.1. Journalists do their jobs in safety in all cases, in nearly all cases, in most cases, in some cases, do not do their jobs in safety   | 4, 3, 2, 1, 0 |
|  | 7.2. The work of journalists does not entail any consequences, entails mild consequences, consequences of moderate severity, severe consequences, very severe consequences   | 4, 3, 2, 1, 0 |
| Total Indicator VII:                                     |  |               |
|  |  |               |
| Total points:  |  |               |



**Annex 2**

| No. | Experts/Evaluators | Position  |
|-----|--------------------|---|
| 1.  | Eugen Rîbca        | Lawyer  |
| 2.  | Alexandru Lebedev  | Manager of Diez.md                                  |
| 3.  | Ludmila Barbă      | Journalist at NPAI Teleradio-Moldova                |
| 4.  | Dumitru Lazur      | Journalist at RISE-Moldova                          |
| 5.  | Raisa Lozinschi    | Journalist at Ziarul National                       |
| 6.  | Viorica Zaharia    | Chair of the Press Council                          |
| 7.  | Olga Guțuțui       | Member of the Audiovisual Coordinating Council      |
| 8.  | Elizaveta Rotari   | Manager of station ATV in Comrat, ATUG              |
| 9.  | Natalia Scurtul    | Journalist in Tiraspol, Transnistrian region        |
| 10. | Lucia Bacalu       | Manager of the newspaper <i>Expresul</i> in Ungheni |
| 11. | Tatiana Puiu       | Lawyer  |
| 12. | Alexandru Dorogan  | Journalist  |
| 13. | Petru Macovei      | Executive Director of API                           |
| 14. | Ion Bunduchi       | Executive Director of APEL                          |

| Indicator | Individual Expert Assessments |      |      |      |      |      |      |      |      |       |       |       |        |        | Points |
|-----------|-------------------------------|------|------|------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|
|           | Ex. 1                         | Ex.2 | Ex.3 | Ex.4 | Ex.5 | Ex.6 | Ex.7 | Ex.8 | Ex.9 | Ex.10 | Ex.11 | Ex.12 | Ex. 13 | Ex. 14 |        |
| 1.1.      | 3                             | 2    | 3    | 2    | 3    | 2    | 2    | 0    | 2    | 2     | 3     | 2     | 2      | 2      | 30     |
| 1.2.      | 2                             | 3    | 3    | 2    | 2    | 3    | 2    | 1    | 2    | 3     | 2     | 2     | 2      | 2      | 31     |

|              |          |          |          |          |          |          |          |          |          |          |          |          |          |          |              |
|--------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|--------------|
| 1.3.         | 2        | 2        | 3        | 1        | 1        | 1        | 2        | 2        | 1        | 2        | 3        | 2        | 2        | 1        | 25           |
| <b>Total</b> | <b>7</b> | <b>7</b> | <b>9</b> | <b>5</b> | <b>6</b> | <b>6</b> | <b>6</b> | <b>3</b> | <b>5</b> | <b>7</b> | <b>8</b> | <b>6</b> | <b>6</b> | <b>5</b> | <b>28.66</b> |
| Ind. II      |          |          |          |          |          |          |          |          |          |          |          |          |          |          |              |
| 2.1.         | 1        | 1        | 2        | 2        | 0        | 1        | 0        | 1        | 0        | 0        | 1        | 2        | 1        | 2        | 14           |
| <b>Total</b> | <b>1</b> | <b>1</b> | <b>2</b> | <b>2</b> | <b>0</b> | <b>1</b> | <b>0</b> | <b>1</b> | <b>0</b> | <b>0</b> | <b>1</b> | <b>2</b> | <b>1</b> | <b>2</b> | <b>14.00</b> |
| Ind. III     |          |          |          |          |          |          |          |          |          |          |          |          |          |          |              |
| 3.1.         | 1        | 1        | 2        | 2        | 1        | 0        | 1        | 1        | 0        | 2        | 1        | 1        | 1        | 1        | 15           |
| 3.2.         | 1        | 1        | 3        | 2        | 1        | 1        | 1        | 3        | 1        | 2        | 2        | 2        | 1        | 1        | 22           |
| <b>Total</b> | <b>2</b> | <b>2</b> | <b>5</b> | <b>4</b> | <b>2</b> | <b>1</b> | <b>2</b> | <b>4</b> | <b>1</b> | <b>4</b> | <b>3</b> | <b>3</b> | <b>2</b> | <b>2</b> | <b>18.50</b> |
| Ind. IV      |          |          |          |          |          |          |          |          |          |          |          |          |          |          |              |
| 4.1.         | 3        | 1        | 4        | 3        | 3        | 3        | 4        | 1        | 3        | 3        | 4        | 3        | 2        | 3        | 40           |
| 4.2.         | 2        | 1        | 2        | 2        | 2        | 2        | 2        | 1        | 1        | 1        | 4        | 1        | 1        | 1        | 23           |
| <b>Total</b> | <b>5</b> | <b>2</b> | <b>6</b> | <b>5</b> | <b>5</b> | <b>5</b> | <b>6</b> | <b>2</b> | <b>4</b> | <b>4</b> | <b>8</b> | <b>4</b> | <b>3</b> | <b>4</b> | <b>31.50</b> |
| Ind. V       |          |          |          |          |          |          |          |          |          |          |          |          |          |          |              |
| 5.1.         | 3        | 1        | 4        | 3        | 2        | 4        | 2        | 2        | 1        | 3        | 4        | 3        | 3        | 2        | 37           |
| 5.2.         | 2        | 1        | 3        | 2        | 2        | 3        | 2        | 3        | 3        | 2        | 2        | 1        | 1        | 1        | 28           |
| 5.3.         | 1        | 1        | 2        | 2        | 1        | 1        | 2        | 2        | 1        | 1        | 2        | 1        | 1        | 1        | 19           |
| <b>Total</b> | <b>6</b> | <b>3</b> | <b>9</b> | <b>7</b> | <b>5</b> | <b>8</b> | <b>6</b> | <b>7</b> | <b>5</b> | <b>6</b> | <b>8</b> | <b>5</b> | <b>5</b> | <b>4</b> | <b>28.00</b> |
| Ind. VI      |          |          |          |          |          |          |          |          |          |          |          |          |          |          |              |
| 6.1.         | 1        | 1        | 3        | 2        | 2        | 1        | 2        | 1        | 4        | 1        | 1        | 2        | 1        | 1        | 23           |
| 6.2.         | 1        | 2        | 4        | 2        | 1        | 1        | 2        | 2        | 0        | 1        | 2        | 1        | 1        | 1        | 21           |
| <b>Total</b> | <b>2</b> | <b>3</b> | <b>7</b> | <b>4</b> | <b>3</b> | <b>2</b> | <b>4</b> | <b>3</b> | <b>4</b> | <b>2</b> | <b>3</b> | <b>3</b> | <b>2</b> | <b>2</b> | <b>22.00</b> |
| Ind. VII     |          |          |          |          |          |          |          |          |          |          |          |          |          |          |              |
| 7.1.         | 3        | 1        | 3        | 3        | 2        | 3        | 3        | 2        | 2        | 2        | 3        | 2        | 2        | 2        | 33           |
| 7.2.         | 3        | 2        | 4        | 3        | 3        | 3        | 3        | 3        | 1        | 2        | 3        | 3        | 3        | 3        | 39           |
| <b>Total</b> | <b>6</b> | <b>3</b> | <b>7</b> | <b>6</b> | <b>5</b> | <b>6</b> | <b>6</b> | <b>5</b> | <b>3</b> | <b>4</b> | <b>6</b> | <b>5</b> | <b>5</b> | <b>5</b> | <b>36.00</b> |

|              |           |           |           |           |           |           |           |           |           |           |           |           |           |           |              |
|--------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|
| <b>Total</b> | <b>29</b> | <b>21</b> | <b>45</b> | <b>33</b> | <b>26</b> | <b>29</b> | <b>30</b> | <b>25</b> | <b>22</b> | <b>27</b> | <b>37</b> | <b>28</b> | <b>24</b> | <b>24</b> | <b>26.66</b> |
|--------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|

