

Public Service Media in Bulgaria: Lack of Sustainability

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This article sets out an overview of the evolution and current state-of-play of public broadcasters in Bulgaria. These are the Bulgarian National Television (BNT) and the Bulgarian National Radio (BNR). Several defining moments in their history will be put under scrutiny and their structure, including the regulatory framework in which they operate, will be analysed. A special emphasis will be placed on the financing and current market shares of the BNT and BNR and the key issue of their independence as well as on the instruments used to keep them under pressure and control them.

Media regulation and public broadcasters

In the wake of 1989, public broadcasters in Bulgaria went through a period of fundamental and radical transformation, which was fraught with multiple problems. The speed of decentralisation varied significantly from one sector to another. Media regulation soon emerged as a pressing issue. At the time, the printed press was governed by the principles laid down in general legislation. This largely explains the rapid emergence of numerous new print media that swiftly gained a foothold in the market in the immediate wake of the events that took place in the autumn of 1989.

However, change in the electronic media sector took a longer route. A delay occurred in the adoption of vital legislation. Until 1998 the Heads of the BNT and BNR were appointed by Parliament in a highly politicised procedure. The first sectoral regulatory body – the National Radio and Television Council (NRTC) – was established only at the end of 1997. In the following year (1998), the Radio and Television Act (RTA) was adopted, setting out the mechanisms available to the government to regulate the functioning of electronic media. Until then the sector had been governed by obsolete bylaws.

Many of the decisions adopted by the NRTC proved either controversial or openly favoured a variety of vested political and economic interests. Media

A Pillar of Democracy on Shaky Ground

regulation itself often appeared to be governed by extraneous considerations. In 2001, the Council for Electronic Media (CEM) was set up as legal successor to the NRTC. One of the principal tasks of the new body was to select and dismiss the directors general of the BNT and BNR. The Council for Electronic Media is also responsible for the issuance of licences and the registration and monitoring of media service providers.

Public service media in Bulgaria: a short history

BNT

The Bulgarian Television broadcast its first programme on 26 December 1959. During the 1960s a large-scale effort went into building a network of transmitters and repeaters across Bulgaria. In 1973, the first colour TV programme was broadcast in Bulgaria and in 1974 a second channel (*Vtora Programa*) was launched.¹

During the socialist regime the Bulgarian Television enjoyed a mixed reputation. On the one hand, it had a firm ideological bias and never wavered from official political doctrine. At the same time, especially during the 1980s, the BNT allowed certain more liberal policies to take root that opened up the broadcaster to a more contemporary content and even some dissenting opinions.

At the very onset of the political changes in 1989, the state-owned television played a key role in the process of political and societal transformation. Even before the printed press and the radio had adapted to the new situation, the national television was quick to gauge the pulse of sweeping change. The volume of news and commentary programmes grew exponentially. On account of being both widely accessible and popular, the media quickly became a desirable tribune for newly sprung political parties and movements.

At the same time, the national television remained in the clutches of unrelenting political control and tended to act haphazardly when under pressure from the events of the day. All governments, sometimes changing in rapid succession, took turns at attempting to gain firm control over the broadcaster. All too often during the 1990s, the BNT found itself embroiled in public scandal. The situation within the broadcaster was also highly volatile. Directors and managing boards were appointed to be dismissed almost

¹ BNT (n.d.) История на БНТ, <https://www.bnt.bg/bg/p/istoria-bnt>.

instantly, journalists were fired. This uncertainty translated into internal conflict and a series of institutional crises.

In 1992, the first channel was renamed to *Kanal 1* and the second to *Efir 2*.² In 1993, the Bulgarian Television was renamed to Bulgarian National Television (BNT). Kanal 1 has had a 24-hour broadcasting schedule since the early 2000s. At the same time, the channel began broadcasting news in Turkish – the mother tongue of 9.1 percent of Bulgarian population.³ In 2013, the national television completed the transition to fully digital broadcasting.⁴

BNR

The first radio broadcast in Bulgaria hit the air in 1929 when a group of engineers built a 60-Watt radio transmitter at the then Engineering Studio in Sofia and launched experimental broadcasting. In 1930, the public organisation Bulgarian Radio Union was established and started radio broadcasts two or three times a week. In the same year, the first public transmitter began broadcasting under the name Radio Sofia. In 1935, the first public radio was established, uniting Radio Sofia, Radio Varna and Radio Stara Zagora. In 1961, the first VHF programmes were broadcast in Bulgaria. Since 1971, the two channels of the Bulgarian National Radio have been broadcast under the names Horizont (meaning horizon) and Hristo Botev, respectively. The Horizont Programme has been broadcast round the clock since 1974.⁵

On the brink of the political changes that swept Bulgaria at the end of 1989 the BNR enjoyed the reputation of a relatively liberal and stable media, which employed excellent professionals and was not averse to giving airtime to some of the more critical voices in society. In the wake of the events in 1989, the radio retained its popularity and leading position. In keeping with the BNT, however, it fell victim to political wrangling and pressure from the powers that be. Journalists were fired and strikes became commonplace. The multiple and exhausting internal conflicts and external pressure that afflicted the National Television in the 1990s also affected the National Radio.

² Ibid.

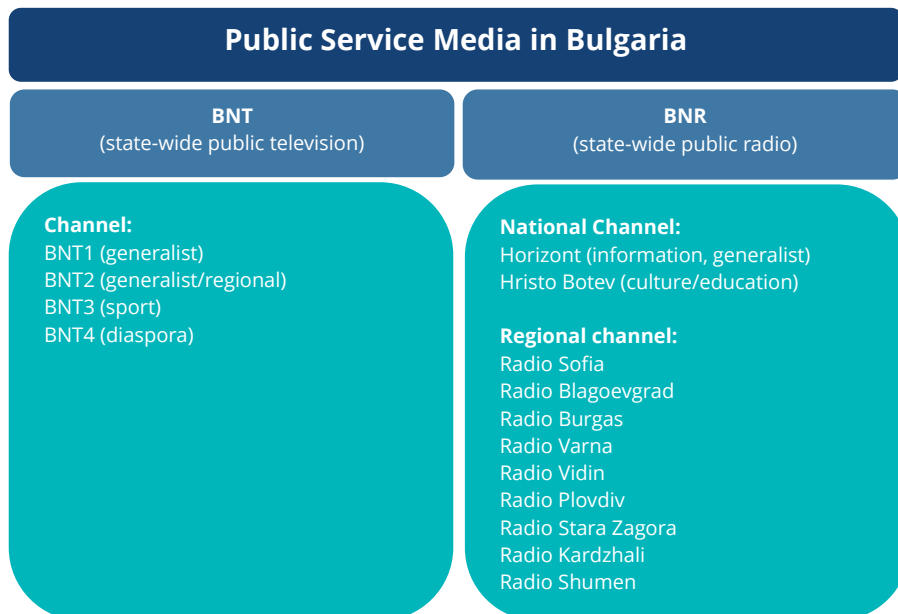
³ National Statistical Institute (2011) Преброяване 2011 (Census 2011), <http://www.nsi.bg/sites/default/files/files/pressreleases/Census2011final.pdf>.

⁴ Mihail Sterbak (n.d.) История на Българската телевизия, [predavatel.com](http://www.predavatel.com/bg/tv/bnt), <http://www.predavatel.com/bg/tv/bnt>.

⁵ Mihail Sterbak (2017) История на Българското радио, [predavatel.com](http://www.predavatel.com), <http://www.predavatel.com/bg/radio/bnr>.

On 26 March 1992, the Bulgarian Radio was renamed to Bulgarian National Radio (BNR). The online broadcasting of radio programmes in eleven languages was discontinued in 2016. Today, the Radio Bulgaria programme is broadcast only in Turkish in the provinces Shumen and Kardzhali (in VHF frequency).⁶ The BNT and BNR have well developed networks of correspondents across Bulgaria. They also have foreign correspondents. The BNT maintains full-time foreign correspondents in Brussels and Berlin and the BNR has full-time correspondents in Moscow and Istanbul.

Structure of the public service media model in Bulgaria



At present, the BNT produces and broadcasts four programmes. The main national TV channel is BNT1. It has a broad polythematic profile and targets a wide audience. The channel features news programmes, opinion journalism, documentary genres and entertainment programmes. BNT2 brought the former five regional programmes under the same umbrella. BNT HD (BNT 3) is a high-resolution sport and entertainment channel providing coverage of major national and international sport events. It is broadcast both terrestrially and via

⁶ Ibid.

cable and satellite. BNT WORLD (BNT 4) is a polythematic channel with content which is intended for Bulgarians living abroad and foreign audiences with an interest in Bulgaria.⁷

At present, the BNR has two programmes with national coverage and nine regional programmes. The two BNR programmes with national coverage are Horizont and Hristo Botev. Horizont features primarily news and music programmes and has a general polythematic profile. It broadcasts news at regular intervals as well as opinion features, music, sport and other programmes. Hristo Botev places an emphasis on cultural, educational and musical programmes and opinion journalism. The programme maintains orchestras and broadcasts classical music performances. It also organises international competitions in literature, dramaturgy, children's arts, singing, etc.⁸

According to the latest statistics published by the National Statistical Institute there are a total of 117 licensed and registered television operators and 85 radio operators in Bulgaria.⁹

Term of office and selection of directors general and managing boards of BNT and BNR

The BNT and BNR operate in accordance with the Radio and Television Act (RTA). The selection and appointment of directors general of the BNT and BNR is a prerogative of the CEM. The media regulator conducts competitions for the two senior positions at the two public broadcasters. After receiving applications, the CEM conducts public hearings and then makes a selection by open vote (three out of five votes of Council members are necessary). The term of office of the directors general of the BNT and BNR is three years. The heads of the two public institutions and the members of their managing boards may be elected to the board for a maximum of two consecutive terms.¹⁰

The managing board of each of the two broadcasters comprises five members proposed by the newly appointed Director-General and approved by the CEM. One of the seats on the managing boards of the BNR and BNT is reserved for

⁷ BNT (n.d.) За БНТ, <https://www.bnt.bg/bg/p/about>.

⁸ BNR (2017) За нас, <http://bnr.bg/hristobotev/post/100785637/programa-hristo-botev-za-nas>.

⁹ National Statistical Institute (2019) Телевизионни оператори ,22 May, <http://www.nsi.bg/bg/content/3645/телевизионни-оператори>; National Statistical Institute (2019) Радиооператори, 22 May, <http://www.nsi.bg/bg/content/3635/радиооператори>.

¹⁰ According to Article 60, Paragraph (2) of the RTA.

A Pillar of Democracy on Shaky Ground

the respective Director-General who chairs the board by right.¹¹ According to the Radio and Television Act the members of the managing board of the BNR, respectively BNT, may not have prior convictions for general criminal offences committed with intent nor may they be sole traders, owners, shareholders, partners, managing director, signatories or members of the managing or supervisory boards of commercial undertaking and cooperatives.¹² A person may not concurrently be a member of the managing boards of the BNR and BNT nor may they concurrently be a member of the board of either the BNR or BNT and of the Council of Electronic Media.¹³

All decisions of the CEM may be contested before the Supreme Administrative Court.¹⁴

The selection of directors general is fraught with pressure and frequently accompanied by political manoeuvring. For example, in 2010 the Parliament voted to amend the RTA in order to reduce its members from 9 to 5 – three elected by Parliament and two by the President. The amendment triggered discontent among opposition parties in Parliament because in their view it strengthened the control of the ruling party over electronic media, particularly in combination with the appointment of the ‘right’ people at the helm of the BNT and BNR.¹⁵

However, other problems continue to throw a long shadow over the transparent appointment of directors general as well. For example, before a new Director-General of the BNT was appointed in 2017, the RTA was amended, making it possible to extend the term of the current incumbent, if the CEM fails to appoint a new Director-General.¹⁶ This change effectively allows the Head of the BNT to remain at the helm of the institution longer thus postponing the appointment of a new Director-General. In 2017, a new Director-General of the BNT failed to be appointed for more than 12 months after the term of his predecessor had expired and the incumbent continued to serve as Director-General. Such practices jeopardise the procedure for the selection and

¹¹ According to Article 58, Paragraph (1) and (2) of the RTA.

¹² Article 59, Paragraph (2), Points (1) and (2) of the RTA.

¹³ Article 60, Paragraph (3) of the RTA.

¹⁴ Article 38, Paragraph (1) of the RTA.

¹⁵ Yordan Velev (2010) CEM ще бъде съкратен и сменен, mediapool.bg, 5 May, <https://www.mediapool.bg/sem-shte-bade-sakraten-i-smenen-news164914.html>.

¹⁶ Article 66, Paragraph (4) of the RTA.

appointment of senior executive officers of the public broadcasters and give the appearance of political interference.

In May 2019, Members of Parliament from the ruling right-centrist party Citizens for European Development of Bulgaria (GERB) and the Movement for Rights and Freedoms (DPS), the centrist liberal party representing primarily the Turkish minority in Bulgaria, tabled a bill amending the RTA, which contained a proposal for the term of office of the directors general of the public broadcasters to be extended from three to five years. According to the accompanying justification the change was necessary in order to achieve 'stability and predictability in the management of the two public institutions'. Furthermore, according to the arguments of the parties that proposed the amendment 'approximately 4 to 6 months are wasted before an acceptable level of efficiency is achieved in the functioning of the two broadcasters following the appointment of a new Director-General. The pressing problems faced by the public broadcasters and society require that such a waste be prevented, particularly in light of the well-known recurrence of this problem every three years'.¹⁷ If the proposed amendments are adopted, in the future the Heads of the BNR and BNT will remain in office for five years as opposed to their current three-year terms.

Public service media financing

According to the RTA, the BNT and the BNR are to be funded primarily from a special Radio and Television Fund into which annual TV and radio signal reception fees (licence fee) collected from the households are to be paid.¹⁸ However, no such Fund has been set up to date and its future is uncertain. The reluctance to implement the relevant provisions of the law on the part of CEM and the central government stems from the realisation that the essentially economic nature of the measure will probably be met with general hostility by citizens. In this situation, the BNT and BNR continue to be primarily funded from subsidies from the central government in amounts determined annually by the government on the basis of a fixed rate per 'hourly broadcasting content'. The rates are determined without any public discussion. The proposal of the central government on the exact amount of the subsidies is deliberated by the Parliamentary Media and Culture Committee without inviting any

¹⁷ Mediapool (2019) ГЕРБ и ДПС искат да удължат мандатите на шефовете на БНТ и БНР27 March, <https://www.mediapool.bg/gerb-i-dps-iskat-da-udalzhata-mandatite-na-shefovete-na-bnt-i-bnr-news291522.html>.

¹⁸ Article 102, Paragraph (1), Point (1) of the RTA.

A Pillar of Democracy on Shaky Ground

representatives of non-government organisations. The minutes from the meetings of the Committee are publicly available.

In 2016, the government subsidy for the BNT was BGN 65 147 000 (ca. 33.3 million Euro) and for the BNR – BGN 42 112 000 (approx. 21.5 million Euro). In 2017 and 2018, the subsidies remained effectively the same. In 2019, a subsidy of BGN 67 730 000 (34.6 million Euro) was granted to the BNT and BGN 44 294 000 (22.6 million Euro) to the BNR.¹⁹ The proposal tabled by opposition MPs to increase the annual subsidy of each public broadcaster by 5 million Bulgarian Lev was rejected.

The BNT and BNR may generate own revenue from advertising and sponsorship; non-core activities relating to TV and radio broadcasting; donations and bequests; interest rates and other income relating to TV and radio broadcasting.²⁰

The advertisements broadcast by both media are subject to strict limitations. The total airtime that may be allocated to advertising is limited to 15 minutes per 24 hours and 4 minutes per hour for the BNT.²¹ Furthermore, the BNT may use up to a third of the total daily airtime for advertising during primetime (7 p.m. until 10 p.m.).²²

Both public broadcasters have been effectively underfunded for years. The subsidies they receive from the central government fail to properly take into account both their needs and the public nature of their work. The BNT in particular has been continually relegated to the periphery of the media market in terms of market share and the same, albeit to a lesser extent, applies to the BNR.

Market shares of the BNT and BNR

According to summary data from the Bulgarian Media Landscape Map drawn up by Piero 97 in 2018 the market share of the BNT group was only 1.4 percent

¹⁹ Parliament of Republic of Bulgaria (2018) Committee on Culture and the Media, Law on the State Budget of the Republic of Bulgaria for 2019, No. 802-01-49, submitted by the Council of Ministers on 29.10.2018, 11 November, <https://www.parliament.bg/bg/parliamentarycommittees/members/2591/reports/ID/9724>.

²⁰ Article 70, Paragraph (3), Points (3) to (6) of the RTA.

²¹ Article 90, Paragraph (1) of the RTA.

²² Article 90, Paragraph (2) of the RTA.

in 2016, further dropping to 0.6 percent in 2017. By way of comparison, in 2017 NOVA Group²³ had a market share of 49.4 percent and bTV²⁴ had a share of 40.3 percent. They were followed by FOX Int. Channels²⁵ with a market share of 4.0 percent and the Discovery Channels with 1.2 percent. This means that the BNT held the fifth place with a negligible market share of less than one percent. The market is fully dominated by private commercial TV channels.

In terms of audience share distribution (in the age group 18 to 49 years) the most popular channel of the Bulgarian public TV operator was BNT 1 with a share of 3.72 percent in Sofia (2.89 percent in large cities and 2.32 percent in small cities, respectively).

According to the 2018 Bulgarian Media Landscape Map the BNR, unlike the BNT, had better positions in terms of competition with private radio stations. The BNR group had a 16.1 percent share of the audience in Bulgaria, including 7.5 percent in Sofia. Horizont, the most popular BNR programme, had a share of 11.4 percent in Bulgaria and 6.6 percent in Sofia. This places the BNR in the third position in terms of popularity and the Horizont programme in the second place in terms of average rating figures (in the age group 15 to 69 years).²⁶

Certain specific public commitments

These problems notwithstanding, the BNT and BNR remain uniquely placed in the Bulgarian media landscape. Against the background of aggressive commercialisation, dumbing down of media content and preponderance of fake news and hate speech, the public broadcasters stand out as an oasis for more

²³ NOVA Broadcasting Group is a private Bulgarian media company, which includes multiple TV channels and websites. In 2019, Advance Media Group EAD bought NOVA Broadcasting Group from Modern Times Group. The media in the group include one of the two most popular TV channels in Bulgaria – NOVA. Its history dates back to 1994 when it was first broadcast as a regional television channel in Sofia. In 2003, the television obtained a national terrestrial broadcasting licence and became the second private television operator in Bulgaria (after bTV).

²⁴ The TV Channel bTV is part of the bTV Media Group – the first private national television in Bulgaria, which hit the air in 2000. Until 2010, bTV was part of Rupert Murdoch’s News Corporation. It was then acquired by Central European Media Enterprises, which was acquired by Time Warner in 2013. Today, bTV is locked in permanent competition with NOVA for the top position in the ranking of TV channels in Bulgaria.

²⁵ FOX International Channels is a private television network owned by Rupert Murdoch’s News Corporation. Its first channel (FOX Life) has been broadcast in Bulgaria since 2005. The network currently comprises multiple channels, offering entertainment, documentary and lifestyle content.

²⁶ piero97.com (2018) Bulgarian Media Map, May 2018, <https://www.piero97.com/wp-content/uploads/2018/06/mm18-A.pdf>.

A Pillar of Democracy on Shaky Ground

balanced discourse and topics that other media traditionally eschew. Both the BNT and BNR report on events and problems relating to various minority groups. Issues relating to minority groups are regularly given attention and discussed in a balanced manner on BNR's Hristo Botev programme as well. The BNT continues to broadcast the only foreign-language news programme in Bulgaria (in Turkish). It is also the only media that broadcasts content adapted to the needs of people with hearing impairments.²⁷

The RTA creates an obligation for both BNT and BNR 'to create programmes with national and regional content; programmes specifically intended for Bulgarians living overseas; and programmes for Bulgarians with a mother tongue other than Bulgarian, including in the respective language.'²⁸ Furthermore, the two broadcasters must produce content that is appropriate for all age groups, safeguard the culture of all Bulgarians, regardless of their ethnicity, promote the works of Bulgarian authors, artists and performers and provide access to national and European cultural heritage as well as produce information, educational and entertainment content.²⁹ The Radio and Television Act further requires that the two broadcasters promote mutual understanding and tolerance in interhuman relations.³⁰

Owing to these broad guidelines and obligations, the public broadcasters continue, at least to a certain extent and despite a host of deficiencies, to promote the idea of dialogue between the individual groups in society. The BNT and BNR strive to develop the public environment in line with the principle of inclusion as opposed to exclusion. They raise the level of egalitarianism in the public domain, clearly delineating areas of shared interests.

Public service media independence: legal requirements

The RTA creates an obligation to the BNT and BNR to follow principles of fair and balanced presentation of different political views in news reporting and in

²⁷ Orlin Spassov, Nely Ognyanova, Nikoleta Daskalova (2018) Мониторинг на медийния плурализъм 2017 – Наблюдение на рисковете за медийния плурализъм в ЕС, Македония, Сърбия и Турция, Национален доклад: България, http://www.fmd.bg/wp-content/uploads/2018/12/mpm2017_narrative_report_bulgaria_bg.pdf.

²⁸ Article 49, Paragraph (1) of the RTA.

²⁹ Article 49 of the RTA.

³⁰ Article 49 of the RTA.

opinion journalism. This is in line with the broader principle laid down by law according to which 'each opinion may be freely expressed in the media.'³¹

The RTA grants special protection to media professionals against external interference in their work: 'Journalists [...] may not receive instructions and orders in performing their work from persons and/or groups that are external to the managing bodies of media service providers.'³² Furthermore, 'journalists employed by media service providers may refuse to perform a task that they believe infringes on the principles laid down in this Act, the terms and conditions of the respective employment agreements or is contrary to their personal convictions.'³³

The principles and provisions laid down in the RTA are supplemented by a number of self-regulation instruments of the BNT and BNR, which govern the access of political figures to the two broadcasters.

For example, the Editorial Policy Rules of the BNT postulates that 'journalists and creative workers of the BNT may not receive instructions or guidance in connection with the journalistic materials they work on and in the context of performing their professional duties from persons and/or groups other than the managing bodies of the BNT.'³⁴ According to the Rules each journalist at the BNT has the obligation to resist acting as a mouthpiece for any external interest or succumbing to pressure or undue influence.³⁵

In turn, the Editorial Policy Rules of the BNT require that journalists and freelance collaborators of the broadcaster 'comply with the principle of independence from any political party; distance themselves from any commercial, social or religious group in Bulgaria and in other countries; and do not become proponents of any specific political, economic or religious interest. The BNR maintains full editorial independence in programme production, without any regard for sponsors, advertisers or third parties in external and joint productions.'³⁶

³¹ Article 11, Paragraph (1) of the RTA.

³² Article 11, Paragraph (2) of the RTA.

³³ Article 11, Paragraph (4) of the RTA.

³⁴ Article 4 of the Editorial Policy Rules of the BNT.

³⁵ According to Article 23, Paragraph (4) of the Editorial Policy Rules of the BNT: <https://p.bnt.bg/p/r/pravilnik-redakcionna-deinost-2011-522.pdf>.

³⁶ According to (Article 5, Paragraph (1), Point (1) of the Editorial Policy Rules of the BNT: <http://bnr.bg/aboutbnr/page/pravilnik-za-redakcionnata-deinost-na-bnr>.

A Pillar of Democracy on Shaky Ground

Regardless of the safeguards envisaged in the regulatory framework and self-regulation instruments, the period after 1989 abounds in examples of public broadcasters failing to act independently from prevailing political context. Overall, an unstable and inconsistent picture emerges. There have been periods when both broadcasters were viewed as largely independent from external influence. The crucial factors in these situations were predominantly personal in nature, such as the appointment of specific directors general, the composition of the CEM, the political configurations in the national Parliament, etc.

Transition to digital broadcasting and deployment of new information technologies at the BNT and BNR

The transition from analogue to digital broadcasting was completed in 2013. Digital television broadcasting using the DVB-T (Digital Video Broadcast – Terrestrial) standard provides coverage to 96.2 percent of Bulgarian households.³⁷ The national digital radio broadcasting network provides coverage of the Horizont programme of BNR to 95 percent of the population.³⁸

The transition to digital broadcasting was accompanied by multiple scandals and political interference in the process of resolving multiplex ownership issues. In 2011, the European Commission launched an infringement procedure against Bulgaria on account of irregularities in multiplex tenders. Ultimately, the government lost its ownership of the TV and radio signal broadcasting infrastructure in Bulgaria. Both public and commercial broadcasters now pay a private multiplex for the terrestrial broadcasting of their programmes. On the other hand, under the Electronic Communications Act cable and satellite operators have an obligation to broadcast the programmes with national and regional coverage of the BNT and BNR free of charge and in real time.³⁹

The adaptation to the digital era has also entailed the roll-out of new information technologies for the purpose of the production and distribution of

³⁷ Predavatel.com (n.d.) Мультиплекс 2 (MUX-2), <http://www.predavatel.com/bg/digital/channels>.

³⁸ Mihail Sterbak (2017) История на Българското радио, predavatel.com, <http://www.predavatel.com/bg/radio/bnr>.

³⁹ Vesislava Antonova (2017) БНТ вече излъчва програмите си на търговския мултиплекс на НУПТС, Capital.bg, 3 April, https://www.capital.bg/biznes/media_i_reklama/2017/04/03/2947047_bnt_veche_izluchva_programite_si_na_turgovskii.

BNT and BNR media content. The significance of this need is highlighted in the RTA, which creates an obligation for the BNT and BNR to 'make full use of the latest available information technologies'.⁴⁰

According to the rules on the structure and organisation of the BNT the Multimedia Division of the organisation comprises three units: Web and Multimedia Content, Web and Multimedia Programming and Design, and Information Technology and Computer Services.⁴¹ More specifically, the Web and Multimedia Content Unit is responsible for the production of information and audio-visual products for the BNT webpage and for content management on the webpage of the national television. The BNT also produces dedicated multimedia content for its webpage. The tasks of the unit also include the maintenance of BNT's presence on social media, including Facebook, Twitter and YouTube.⁴²

Likewise, the rules on the structure and organisation of the BNR also provide for the active presence of the national radio in the new digital communication environment. The rules govern the work of the Multimedia Programmes Directorate. The BNR Web Portal Newsroom operates as a self-contained unit responsible for the 'development and maintenance of a web portal that provides a common platform for the websites of national and regional programmes of the BNR and the productions of Radio Bulgaria'. The newsroom makes decisions on the content of the BNR website, presents the production of the national radio orchestras and arranges the online video and audio broadcasting of all musical events organised by the BNR.⁴³ The Rules also govern the work of main editorial directorate Binar Internet Radio, which is responsible for 'the development and maintenance of a multimedia web platform with unique content blended with content from other BNR programmes; the maintenance of seven music channels, and the recording and broadcasting of concerts and other BNR events as well as the maintenance of a proprietary library and podcast website featuring all BNR programmes'.⁴⁴

⁴⁰ Article 6, Paragraph (3), Point (3) of the RTA.

⁴¹ Article 39, Paragraph (1) of the Rules.

⁴² Article 39, Paragraph (4), Points (1) to (4) of the Rules:
<https://p.bnt.bg/n/o/nov-pravilnik-bnt-2016-517.pdf>

⁴³ Section VI, Article 18, Paragraph (3), Point (2) of the Rules.

⁴⁴ Section VI, Article 18, Paragraph (3), Point (3) of the Rules:
<http://bnr.bg/aboutbnr/page/pravilnik-za-strukturata-i-organizaciata-na-bnr>.

A Pillar of Democracy on Shaky Ground

Steps towards the transformation and restructuring of the BNT newsroom (and those of the other larger TV operators) into multimedia newsrooms were taken after 2011.

At the time, the BNT modernised its website and started applying the cross-media principle (disseminating the same content on all channels and platforms).⁴⁵ Similar changes were under way at the BNR.

The strategies for making full use of the digital environment soon began to pay off. Despite the relatively limited resources available for maintenance, in 2018 the BNT website was ranked seventh among the most visited websites of media with an online presence in Bulgaria.⁴⁶ The BNR, on the other hand, continued to rely primarily on its strong positions in terrestrial broadcasting.

Public service media under pressure

The instability of independent public broadcasters remains a pressing problem in the Bulgarian media environment. In the last two to three years, increasingly stronger criticism has been voiced, particularly with regard to the BNT. For example, in the country report on Bulgaria under the mechanism for media pluralism monitoring (MPM) for 2018 the following is noted: 'Worryingly, some recent tensions and disturbing tendencies have affected the public service Bulgarian National Television (BNT), involving programme management representatives (controversies with journalists over editorial guidelines, gaffes related to quality of content, etc.). Such ongoing developments influence the state of media pluralism in the country and have the potential to rapidly change the whole picture, which remains unstable.'⁴⁷

In 2018, due to pressure from senior figures in BNT management, several reporters resigned from the media. The senior producer of the BNT was

⁴⁵ Valeri Marinov (2013) Мултимедийният нюзрум, *Newmedia21*, 20 September, <https://www.newmedia21.eu/proekti/multimedijniyat-nyuzrum>.

⁴⁶ Reuters Institute (2018) Digital News Report 2018, <https://reutersinstitute.politics.ox.ac.uk/sites/default/files/digital-news-report-2018.pdf>.

⁴⁷ Orlin Spassov, Nely Ognyanova, Nikoleta Daskalova (2018) Мониторинг на медийния плурализъм 2017 – Наблюдение на рисковете за медийния плурализъм в ЕС, Македония, Сърбия и Турция, Национален доклад: България, http://www.fmd.bg/wp-content/uploads/2018/12/mpm2017_narrative_report_bulgaria_bg.pdf.

dismissed without either an explanation or prior notice. The producers of a morning talk show on culture (*Denyat zapochava s kultura*) was also dismissed after voicing a critical opinion on management interference with the choice of topics and guests to be invited to the programme. Likewise, the senior producer of the Sport Content Production Centre, a unit of the Information Directorate, was similarly dismissed. Programmes discussing thorny or sensitive issues have been taken off the air at the last moment, the referendum programme being a case in point. The same applies to figures known to hold dissenting opinions who were refused participation in various programmes. The financial director, the senior accountant and other key figures responsible for the financial and business dealings and management of the BNT were also dismissed without any convincing reasons being cited.⁴⁸ These developments have given rise to speculation that news reporting and opinion journalism at the BNT have been effectively put under control.⁴⁹

In 2019, after the Director-General of the BNT Konstantin Kamenarov resigned (on account of the entry into force of a sentence for driving under the influence of alcohol), the CEM appointed Emil Koshlukov, Programme Director of BNT1, acting Director-General and later as Director-General. The appointment triggered a strong reaction from different associations as Emil Koshlukov is a controversial figure due to his previous engagements in politics.⁵⁰ How this will affect the editorial policy of BNT and its relations to politics needs to be observed further.

Regardless of the fact that it still employs some of the leading journalists in Bulgaria who have frequently voiced critical opinions against the status quo in Bulgarian politics, the BNR has also attracted criticism in recent years. In 2018, the national radio was criticised over 'the lack of a comprehensive development strategy, its failure to attract competent staff, the corporate culture of fear

⁴⁸ Vesislava Antonova (2018) Промени в БНТ: Равнис по интересите на властта, Capital.bg, 29 June, https://www.capital.bg/politika_i_ikonomika/bulgaria/prilojna_ikonomika/2018/06/28/3207994_promenite_v_bnt_ravnis_po_interesite_na_vlastta.

⁴⁹ Ibid.

⁵⁰ For example, the Association of European Journalists in Bulgaria (AEJ Bulgaria) declared that 'the appointment of Emil Koshlukov as acting Director-General is a blow against the integrity of the public broadcaster'. The main cited reasons were that the incumbent had 'a tendency to swap politics for journalism' and the fact that the incumbent was appointed at the BNT after declaring an internship at Alpha TV, the television of the right-wing populist political party Ataka whose leader has been sentenced for hooliganism and anti-social behaviour three times and espouses a political ideology that can be described as anti-EU and extremist.

A Pillar of Democracy on Shaky Ground

of dismissal and staff demotivation.⁵¹ In January 2019, the CEM adopted the BNR report on its programme, technological and financial activity for the period June-November 2018. One aspect of the criticism levied on the BNR by the Council concerned the failure to give airtime to a wider range of different opinions and ideas in society.⁵² Despite this, key government officials continue to propagate the view that the BNR has the most critical attitude towards the government despite receiving a subsidy from the national budget as proof of the lack of political interference.⁵³

However, in the fall of 2019 this image of being more critical suffered after journalist Silvia Velikova got suspended by the new management, followed by a five-hour broadcasting interruption of the BNR's Horizont Channel. BNR's leadership claimed that the shutdown was because of technical reasons, but it widely has been linked to the temporary transfer of Velikova who is known for exposing corruption scandals and is considered a critical journalist. The case showed that there is a lot of pressure on journalists inside BNR and that even the public radio is not immune to political influence.

Conclusion: dilemmas faced by the BNT and BNR

Ultimately, both the BNT and BNR are torn between the opportunity to act as beacons of professional journalism and the possibility of falling into the trap of undue influence that pushes them into blind servitude. In some respects, both public broadcasters remain a role model and succeed in retaining the trust of their respective audiences. At the same, there is a clear threat of professionalism, and hence the professional function they perform, being eroded. Instead of ensuring that they are better funded, the two public broadcasters are pushed towards greater commercialisation of programmes, becoming more vulnerable to vested interests (mostly through external productions). This is first and foremost a threat to their ability to freely and publicly voice critical opinions seeking to highlight problematic issues in government and society. Instead of promoting and strengthening their valuable social function, their very existence has been put into question and must be

⁵¹ Union of Bulgarian Journalists (2018) Някой да е чувал нещо за рейтингите на БНР?, 15 April, <https://www.sbj-bg.eu/index.php?t=38944>.

⁵² CEM (2019) Protokol No 3, 16 January, <https://www.cem.bg/activitybg/1889>.

⁵³ 24 chasa (2018) Депутатите приеха бюджета на БНТ, БНР и БТА за 2019 г., 29 November, <https://www.24chasa.bg/novini/article/7175774>.

defended. The weakening of public broadcasters beyond a critically low level may pose a real threat to democracy in Bulgaria.

In January 2019, the Directors General of the BNT and BNR announced that a joint working group would be set up to draw up a draft strategy for the development of public broadcasters in Bulgaria.⁵⁴ The need for changes and guarantees for their successful continued functioning is apparent. We can therefore remain hopeful that the strategy will not remain an empty promise. The BNT and BNR should transform into innovative public institutions capable of making full use of both traditional terrestrial broadcasting and the possibilities provided by new technologies for the benefit of democracy.

Recommendations

1. Increasing the financing of the BNT and BNR.
2. Ensuring compliance with the obligation envisaged in the RTA to establish a Radio and Television Fund.
3. Developing mechanisms that lower the dependence of public broadcasters on the government (including by appropriate legislative amendments).
4. Election of Directors General of the public broadcasters with a qualified majority of the votes of CEM members to ensure broader consensus and political support for the decisions made.
5. Developing policies that safeguard and strengthen the public functions of the BNT and BNR (including through amendments to the RTA).
6. Ensuring ongoing monitoring of the work of public broadcasters, including by non-governmental organisations.
7. More active engagement of citizens in policy development at the level of CEM and public broadcasters.

⁵⁴ Dnevnik.bg (2019) БНР и БНТ ще готвят стратегия за развитие на обществените медии, 25 January, https://www.dnevnik.bg/bulgaria/2019/01/25/3380808_bnr_i_bnt_shte_gotviat_strategiia_zh_razvitiie_na_i

A Pillar of Democracy on Shaky Ground

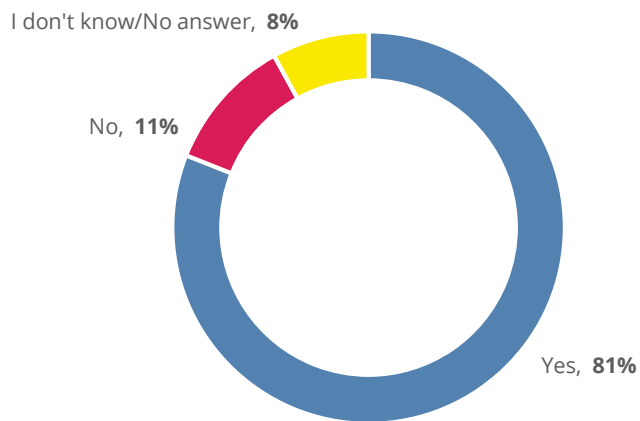


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the last couple of years, he is project manager of Bulgarian team of the Media Pluralism Monitor, an initiative involving all EU countries, managed by European University Institute in Florence and sponsored by the European Commission.

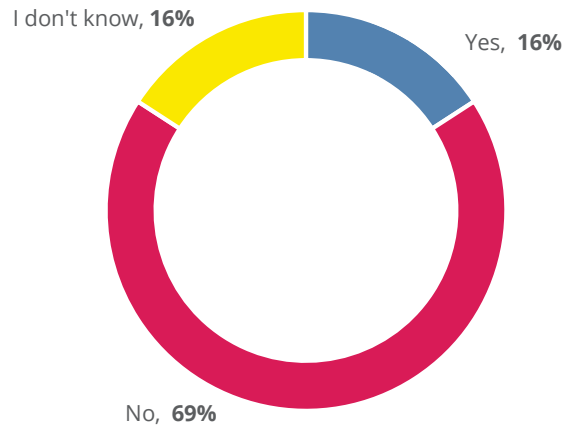
Opinion Poll Bulgaria

Chart 1: Are Public Service Media (PSM) important for democracy in your country? (Base: Total Bulgarian sample, in percent)



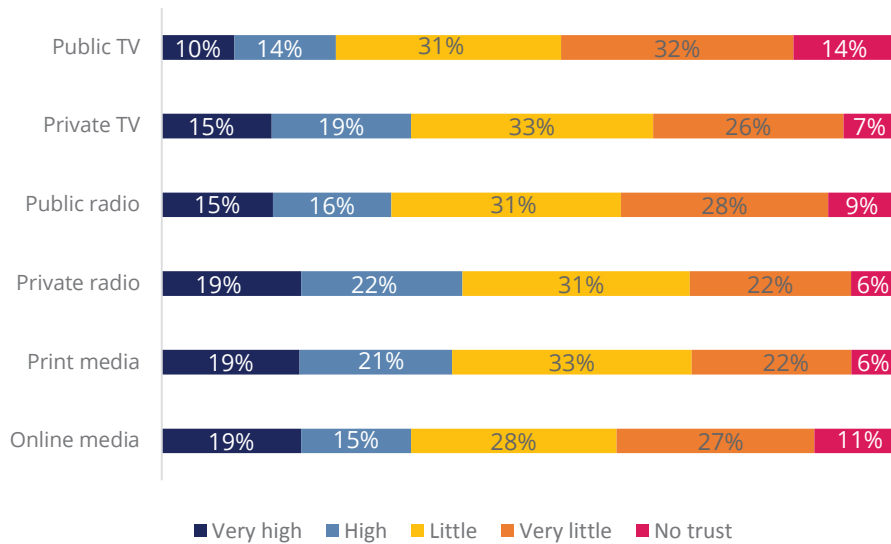
In the entire sample, EU countries generally consider PSM to be important for democracy to a higher degree as compared to non-EU countries. 8 out of 10 Bulgarians share this opinion, without significant differences between various demographic profiles (see Chart 1).

Chart 2: In your opinion, are PSM free from political influence in your country? (Base: Total Bulgarian sample, in percent)



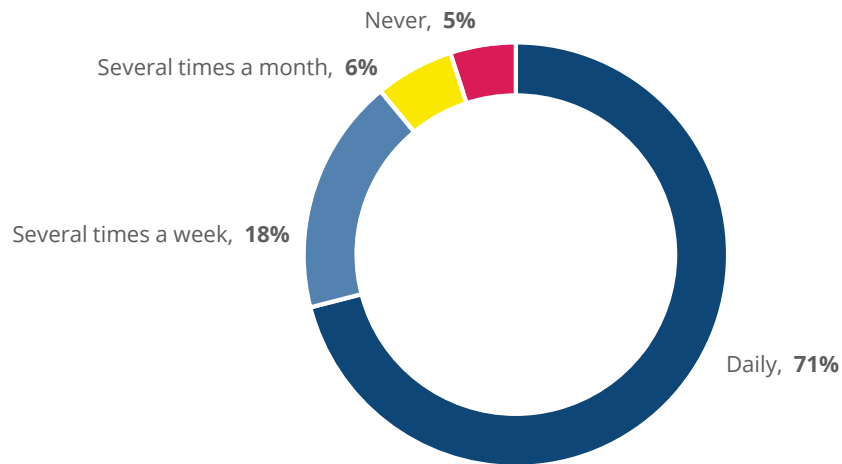
However, respondents in Bulgaria do not differ from the rest in the region regarding the question whether PSM are free from political influence. 69 percent said they PSM are not free (see Chart 2). This question did not present demographic profiles that would express significantly different opinions.

Chart 3: How much trust do you have in following media? (Base: Total Bulgarian sample, in percent)



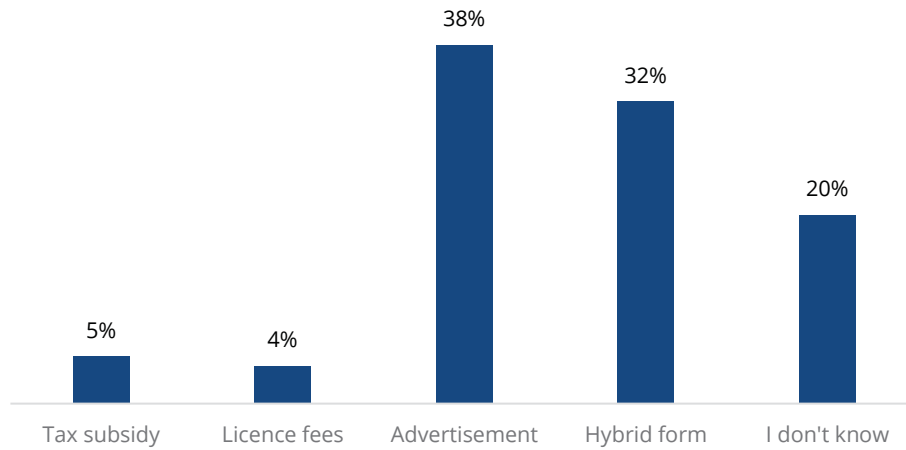
Bulgarians are generally very critical of media. As compared to other media, public service media enjoy the lowest trust of Bulgarian citizens. 77 percent either have little or no trust in public TV and 68 percent in public radio. This distrust applies to a lesser extent to private media. Two-thirds of respondents do not trust or have little trust in private TV and 59 percent distrust the private radio stations (see Chart 3).

Chart 4: How often do you use the services of Public Service Media (PSM)?
(Base: Total Bulgarian sample, in percent)



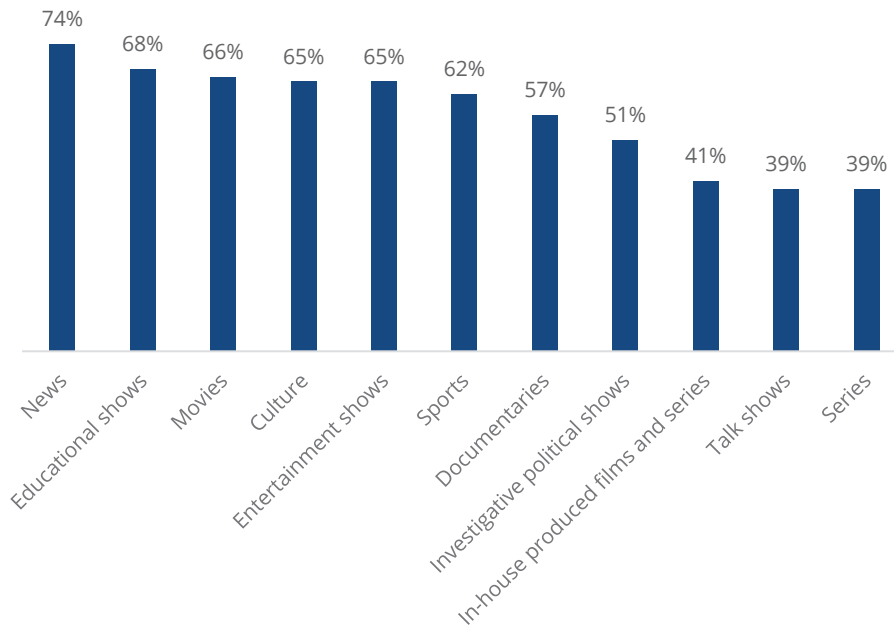
Despite low levels of trust in PSM, Bulgaria is one of the countries in the region where PSM have the largest audience: 71 percent of respondents use PSM daily and 18 percent several times per week, meaning that 89 percent of citizens use PSM at least several times a week (see Chart 4). Only young citizens, aged 18-29 years, have a lower percentage of their daily use, with 60 percent of referenced age group using PSM daily.

Chart 5: What type of funding do you prefer for PSM? (Base: Total Bulgarian sample, in percent)



Preferences in terms of private TV and radio are also visible in the preferred funding models, with a model similar to the financing of private channels through advertising being introduced for PSM, followed at a short distance by a hybrid model of financing. The direct funding of PSM through licence fees (4 percent) and the current tax subsidy system (5 percent) are not seen as a desirable model (see Chart 5).

Chart 6: What kind of content should PSM present? (Base: Total Bulgarian sample, in percent, multiple answers possible)



With regards to content preferences, Bulgarians do not differ from others in the region. They also confirm the gender-based pattern, with 74 percent of male citizens preferring to watch sport programmes as compared to 50 percent of women. However, there is higher percentage of female citizens (47 percent) who would like to watch in-house film productions and series as compared to 35 percent of men. Respondents with university education would, on average, like to watch more cultural (79 percent) and educational (83 percent) programmes.