

Annex 1A - Context Analysis (Media)

This context analysis is focused specifically around issues pertaining to the Media engagement under DANEP 2027 – 2031. The annex is complementary to the Annex 1 - Context analysis included in the overarching programme document for DANEP 2027 - 2031, which provides a broader overview of the contextual dynamics in the region.

The countries of the region present a heterogeneous picture of media freedom. For example, Moldova and Armenia hold relatively strong positions on global indices while in Bosnia and Herzegovina, structural capture and political paralysis have severely curtailed press independence. Press freedom in Ukraine faces particular challenges given the nature of the ongoing effects of the Russian invasion. Despite differing national contexts, the countries of the region share a set of structural conditions that constrain the development of independent, pluralistic media.

These challenges include a weak and concentrated advertising markets, in which politically connected businesses use ad spend as a tool of editorial pressure or reward, combined with an over-reliance on international donor funding, leaving media ecosystems exposed when major funders withdraw (as demonstrated by the USAID cuts of early 2025). There are also issues with opaque media ownership, making it difficult to assess conflicts of interest and editorial independence. Journalists also struggle with inadequate or unenforced legal protections, compounded by legal systems vulnerable to political influence. Disinformation ecosystems are pervasive, primarily but not exclusively fed by Russian state and proxy actors, exploiting social divisions, EU accession anxieties, and electoral moments, help by accelerating platform dependency, with Facebook, YouTube, and Telegram driving audience reach, at the expense of sustainable direct media-audience relationships.

Cross-cutting Thematic and Structural issues

Investigative Journalism and Safety of Journalists

Journalists in Ukraine face a complex and interrelated set of challenges which are quite unique given the ongoing Russian invasion. On the one hand, Ukrainian journalists are at direct risk of Russian aggression. Four Ukrainian journalists were killed in 2025, and the Safety of Journalists Platform recorded 344 press freedom alerts across Europe in 2025, 29% higher than 2024, with Ukraine accounting for 27 of them. On the other hand, Ukrainian independent media is also constrained by Ukrainian authorities. Ukrainian investigative journalists face SLAPP litigation, surveillance by the Security Service of Ukraine (SBU), and over 264 recorded cases of obstruction of journalistic activity since 2022.

In Armenia, the operating environment deteriorated in 2024: authorities recorded 15 cases of physical violence affecting 24 victims, 71 instances of other forms of pressure, and 122 violations of the right to obtain and disseminate information. Court cases on defamation and insult charges rose from 34 in 2023 to 43 in 2024. In Bosnia and Herzegovina, political influence over public

broadcasters persists, their financial sustainability is increasingly at risk, and incidents of threats and intimidation, particularly against women journalists, have risen sharply since early 2025.

Sustainability of Independent Media

Independent media across all four countries share a common structural vulnerability: the gap between the cost of quality journalism and the revenue available from local advertising markets cannot be bridged without external support. Local advertising markets are not only small but are frequently weaponised by political actors who pressure advertisers against independent outlets. This dynamic leaves independent media in a structurally dependent relationship with international donors, a vulnerability that was starkly exposed in early 2025 when USAID's withdrawal triggered an immediate crisis for outlets across the region, most severely in Bosnia and Herzegovina, where the impact has been described as 'acute' and financially devastating for multiple independent newsrooms.

A major structural obstacle for independent media in Eastern Neighbourhood countries is the weak local advertising market, with businesses pressured not to place ads with organisations publishing material contrary to government interests. Across the region, different outlets are experimenting with approaches including reader-supported journalism (subscription and membership), philanthropic foundations, event revenue, and training services. These models require different organisational competencies than traditional advertising-based journalism.

Countering Disinformation

The region operates in an information environment heavily shaped by Russian state and proxy disinformation operations. These operations are not uniform: they target different audiences with tailored narratives. The 2024 Disinformation Resilience Index (DRI) for Central and Eastern Europe developed by the East Center, covering Armenia, Moldova, and Ukraine among others, documents how Russia's full-scale invasion of Ukraine has been “a watershed moment that has dramatically reshaped the information landscape and intensified disinformation campaigns” across the region. The index emphasises that effective counter-measures require a holistic approach engaging governments, media organisations, civil society, and technology companies. A significant evolution in strategy is the shift from reactive debunking, i.e. correcting false information after it has circulated, to proactive prebunking, i.e. inoculating audiences against specific disinformation techniques before they encounter manipulated content. This approach is grounded in psychological inoculation theory, which holds that exposure to weakened forms of manipulative arguments can build cognitive resistance.

Across the region, media literacy education is increasingly recognised as a foundational complement to both prebunking and institutional counter-disinformation measures. A 2024 study on media literacy in Ukraine, undertaken as part of an IMS programme, noted the importance of translating findings into practical educational interventions. In Armenia, media literacy initiatives are addressing the challenge of deep political polarisation of information consumption. The DRI 2024 report recommends stronger cross-sector collaboration between education systems, media organisations, and civil society for sustained media literacy programming.

Capacity Building and Networking

The Justice for Journalists Foundation notes that Armenia, Moldova, and Ukraine maintain relatively pluralistic and independent media environments, while cross-border cooperation remains a key development priority. EU4IM incorporates peer-to-peer exchange as a core pillar, grounded in the belief that if independent media journalists have the capacity to produce high-quality, engaging content, they will be more competitive, leading to greater societal resilience and government accountability.

Examples of Country Specific Dynamics

Armenia

Despite a diverse media landscape, the media is polarised, shaped by internal political tensions, border security issues, and its geopolitical position between Russia and the EU. The country faces significant disinformation and hate speech, especially around the Nagorno-Karabakh dispute. Social media is the primary news source for most Armenians, with independent online outlets like Civilnet.am, Hetq.am, and Azatutyun.am thriving since the 2018 “Velvet Revolution.” However, traditional media, often tied to political or commercial interests, remain under pressure with limited editorial independence.

Journalists in Armenia operate in a hostile environment, frequently subjected to intimidation, physical violence, and online harassment from both government and opposition factions. Incidents often go unpunished, reinforcing a culture of impunity. Coverage of border clashes, protests, or politically sensitive topics is particularly risky. Financial constraints such as an underdeveloped advertising market and limited subscription models further undermine the independence of privately owned media. Under Prime Minister Nikol Pashinyan’s government, press freedom has faced setbacks, including the recriminalization of defamation and a rise in legal actions against journalists. The Council of Europe has raised concerns about Armenia’s growing trend of criminalising free expression, which contradicts international standards. In 2024, reporters covering protests experienced violence at the hands of law enforcement, underscoring the precarious conditions for media workers.

In the lead-up to the 2026 elections, civil society and independent media face growing pressures, including disinformation, shrinking civic space, and attacks on human rights defenders and journalists. The government has adopted a National Concept and Action Plan for Combating Disinformation (2024–2026), aiming to strengthen media literacy and institutional resilience. However, concerns remain about the sustainability of civil society’s operating environment, especially as political polarisation and external interference, including from Russia, pose ongoing risks to democratic values and human rights protection. Despite these challenges, Armenia improved its ranking to 43rd on Reporters Without Borders’ 2025 Press Freedom Index (up from 34th in 2024), signalling some progress.

Bosnia and Herzegovina

Media freedom faces significant pressure from political actors and oligarchic interests. Journalists encounter intimidation, self-censorship and legal harassment, while disinformation campaigns,

particularly from pro-Russian media in Republika Srpska who are seeking to undermine BiH's EU aspirations. BiH ranks 86th out of 180 countries in Reporters Without Borders World Press Freedom Index (2025). This follows an already alarming decline of 17 places in 2024. This descending trend reflects a deepening crisis for media freedom in the country, driven by several factors, including attempts at various levels of governance in BiH to introduce harmful legislation restricting freedom of expression, increased political pressure on journalists and media, frequent verbal and physical attacks against journalists and media workers and growing efforts to silence independent and investigative reporting. Although legal guarantees for media freedom exist, enforcement is sporadic, and investigations into attacks on journalists rarely lead to convictions. Strengthening media independence and fostering pluralistic public discourse remain key priorities for democratic resilience.

Moldova

The media environment has improved in global rankings but remains highly polarised and vulnerable to political and geopolitical pressures. Moldova ranked 35 out of 180 countries in Reporters Without Borders' 2025 World Press Freedom Index, a sharp improvement from its position around 90th place in 2020 and 40th in 2022, reflecting reforms, pluralisation of the information space and a more favourable environment for independent outlets. Media bias has deteriorated, however, with deepening divides between pro-Russian and pro-Western camps. While oligarchic and political control over editorial lines has eased compared to prior years, journalists still face verbal intimidation from politicians and cyber-harassment from partisan supporters. Access to the Russian-backed separatist region of Transnistria requires special accreditation, limiting independent reporting.

Ukraine

Despite a diverse media landscape, major national television outlets in Ukraine remain influenced by oligarchic interests. Since 2021, combating measures include banning Russian media outlets and adopting the "anti-oligarchic law". The United News telethon, a state-coordinated broadcast, consolidated most national TV channels into a single platform, strengthening wartime communication but also reducing editorial diversity and increasing the risk of government-aligned narratives dominating the news. Critics, including the European Commission and Reporters Without Borders, have raised concerns about the telethon's impact on independent journalism and media pluralism.

Reporters Without Borders ranks Ukraine 62nd out of 180 countries on their 2025 index. A 2023 survey on challenges for freedom of speech and journalistic activity found that 62% of Ukrainian journalists consider the United News telethon a form of censorship and while journalists report that freedom of speech conditions remain acceptable under wartime circumstances, some negative trends are emerging. These include growing self-censorship driven by security concerns and patriotic pressure to avoid "sensitive" topics such as military failures or high-level corruption.