WAN IFRA
World Association of Newspapers and News Publishers

CIMA
CENTER FOR INTERNATIONAL MEDIA ASSISTANCE

Curbing Media, Crippling Debate

Soft Censorship in Bulgaria

www.wan-ifra.org

Curbing Media, Crippling Debate
Soft Censorship in Bulgaria

PUBLISHER:
WAN-IFRA
World Association of Newspapers
and News Publishers
96 bis, Rue Beaubourg
75003 Paris, France
www.wan-ifra.org

WAN-IFRA CEO:
Vincent Peyrègne

PROJECT MANAGER:
Mariona Sanz Cortell

EDITOR:
Thomas R. Lansner

PRINCIPAL RESEARCHER:
South East Europe Media Organisation
(SEEMO), Vienna
www.seemo.org

SEEMO RESEARCHERS:
Siobhan Hagan
Sladjana Matejevic
Orlin Spassov
Kristina Stevancevic

SEEMO EDITOR:
Oliver Vujovic

OTHER RESEARCH PARTNERS:
International Press Institute (IPI), Vienna
International Academy - International Media
Center (IA-IMC), Vienna
International Academy (IA), Belgrade

PROJECT PARTNERS:
Center for International Media Assistance
National Endowment for Democracy
1025 F Street, N.W., 8th Floor
Washington, DC 20004, USA
www.cima.ned.org

Open Society Justice Initiative
224 West 57th Street
New York, New York 10019, USA
www.opensocietyfoundations.org

SUPPORTED BY:
Open Society Foundations

DESIGN AND PREPRESS:
Snezana Vukmirovic, Ivan Cosic, Plain&Hill Serbia

NOTE ON REPORT RESEARCH AND METHODOLOGY

This report on the existence and extent of soft censorship in Bulgaria is part of the Soft Censorship Global Review, produced by the World Association of Newspapers and News Publishers (WAN-IFRA) in cooperation with the Center for International Media Assistance (CIMA), with the support from the Open Society Foundations. It was prepared by the South East Europe Media Organisation, based on the methodology developed by WAN-IFRA.

Table of Contents

Executive Summary

The independence and pluralism of Bulgaria's media has eroded steadily over the past decade. The downward spiral in media freedom that threatens to drown public debate on important policy issues is unrestrained since 2006, when the country was ranked 35th on the Reporters Without Borders Index. Nine years later, Bulgaria has fallen to 106th place.[12]

Media freedoms and public awareness are increasingly constrained despite constitutional protections for media freedom, right to access information guaranteed by the Law on Access to Public Information, and active participation of international media groups in the country's media landscape over the past 25 years.

Bulgarian authorities are increasingly employing tools of "soft censorship" to dominate the country's media and narrow public access to information and informed policy debate. This analysis defines official "soft censorship" or indirect censorship as any of an array of official actions intended to influence media output, short of legal or extra-legal bans, direct censorship of specific content, or physical attacks on media outlets or media practitioners. These indirect forms of censorship include selective media subsidies and partisan allocation of advertising, as well as biased application of regulatory and licensing powers that can influence editorial content and affect media outlets' viability. Beyond the scope of the investigation detailed here are myriad forms of unofficial indirect censorship that may affect media output. These may rise from religious or other social norms and traditions, or adherence to societal narratives that influence institutional and individual reporting, and which might be promoted or imposed by a variety of non-state actors.

Biased state funding for media is a principal tool of soft censorship in Bulgaria. Allocation of advertising and subsidies lack transparency. The financial crisis strained profits for most private media, increasing dependency on government funding and leading to shallower journalism that avoids criticizing official actions. Many journalists cannot report impartially—and many are unwilling to speak about soft censorship—for fear of losing their jobs.

Most media not controlled by the state are largely in the hands of businesses with close ties to the government. Ownership is opaque, but can be traced to a handful of leading political and business interests. Media owners and editors know that critical coverage of people and institutions controlling or influencing the allocation of funds or other benefits may lead to the denial or withdrawal of such support, endangering their financial viability. In many instances, self-censorship becomes necessary for economic survival. Informed public debate on policy matters is increasingly difficult as ever fewer media outlets now offer the public unbiased information regarding matters of public interest.

Evidence suggests that most of the Bulgarian government's public awareness campaign spending, which is often selectively awarded to exercise soft censorship and limit media freedoms, comes from European Union funds. It is worth noting that such funding is intended to raise awareness of EU laws and standards—which themselves protect free media and clearly forbid discrimination in allocation of state monies to media.

There are now fewer physical attacks on journalists, although various threats are still reported. Much more common is use of libel and defamation lawsuits to intimidate journalists or media outlets that do not self-censor. Imprisonment for libel and defamation

was abolished in 1999, but both remain criminal offences. Articles 146 (insult), 147 (criminal defamation), and 148 (public insult) of the Bulgarian Criminal Code prescribe fines up to 20,000 BGN (EUR 10,000). Convictions in such cases are few, but the real possibility of prosecution has a chilling effect on active and open reporting.

This report, based on a series of interviews with journalists and media experts from Bulgaria as well as other research, provides an overview of soft censorship in Bulgaria and suggests actions to reverse what is a steadily rising and already very damaging tide of repression.

Country profile

Bulgaria Country Data	2014/2015
Capital	Sofia
Total population	7.2 million (2014)[1]
GDP	2.0% (2015*)[2]
Unemployment	10.6% (2015*)[3]
Adult literacy rate	98.4 % (2008-2012)[4]
Internet users (regular)	50 % (2013)[5]
Fixed-telephone subscribers	97% (2013)[6]
Mobile-cellular subscribers	62% (2013)[7]
Corruption perceptions score (rank)	69/175 (2014)[8]
Freedom House rating (press)	Partly Free[9]
Reporters without Borders (rank)	106/180[10]
IREX MSI Overall Country Score	1.85[11]

Key Findings

1. Selective allocation of state resources to "friendly" media has helped make self-censorship common, especially among journalists working in larger media groups.

2. The opacity of media ownership in Bulgaria obscures relations between beneficiaries of state advertising and state bodies responsible for distributing funds.

3. It is often unclear how public funds, especially from the European Union, are allocated. Preferential allocation of public funds to state-favoured media outlets that offer positive coverage threatens media independence and curtails public debate.

4. Smaller media outlets that are critical of government are often denied access to funds or advertising. They face financial challenges that threaten their survival in Bulgaria's small yet competitive commercial media market.

5. Official and reliable information about the circulation of print media is lacking, making assessment of the fairness of official spending on media difficult.

6. Communication plans designed by ministries often lack clear eligibility criteria for media outlets and transparency in allocation of advertising.

7. Government use of public relations and media agencies to implement public campaigns and allocate advertising further obscures spending of public funds on media and assessments of its fairness.

8. The independence of the Bulgarian National Television (BNT), Bulgarian National Radio (BNR), and the Bulgarian News Agency (BTA) is tenuous, and these outlets sometime appear unwilling to criticize government policies and the ruling party.

9. External pressure, especially from the European Union and European Parliament, is the most effective tool for facilitating changes in the Bulgarian political, legislative and media system.

Key Recommendations

1. The Bulgarian public should be given access to data to make informed choices about their media consumption, including data concerning ownership structures.
2. Guidelines of the National Communications Strategy published in September 2014 requiring that state funding for media advertising and campaigns meets European standards for fairness and transparency must be implemented and fully honoured.
3. The European Union should demand strict adherence to requirements that all of its funding for awareness campaigns and other publicity is allocated transparently and fairly in a manner that meets EU standards and promotes free, independent and pluralistic media in Bulgaria.
4. The state must ensure that laws and regulations are not misused to promote personal, political and business agendas, or to silence investigative journalists. To promote this, recommendations of the European Commission on Bulgaria regarding judicial appointments must be implemented.
5. The Bulgarian National Television (BNT) the Bulgarian National Radio (BNR), and the Bulgarian News Agency (BTA) should operate transparently and autonomously in the public interest.
6. Equal access to official information in Bulgaria should be guaranteed for all media.
7. Better watchdog and media monitoring initiatives should be launched to assess the effects of media consolidation.
8. Reporting that appears to be unprofessional and/or unethical should be assessed and addressed impartially by self-regulatory media bodies.

Media, Business, and Power in Bulgaria

Self-censorship, especially among critical voices and journalists working for larger media groups, has become pervasive in Bulgaria due to many media outlets' heavy reliance on public funds. The latest EU Anti-Corruption Report (2014) notes that in Bulgaria, "Media ownership and financing lack transparency, and paid-for coverage is not consistently identified as such. Print media, especially local outlets, depend on the public sector for advertising revenue. To address such concerns, Parliament is considering new legal provisions on the transparency of media ownership. In 2013, the government vowed to streamline procedures for awarding publicity contracts financed by EU funds; statistics suggest such contracts may have been allocated to the detriment of media independence."[13]

The 2014 Freedom House report on Freedom of the Press in Bulgaria found that "the shrinking private advertising market has increased the importance of state advertising and other de facto subsidies, especially for local outlets".[14]

In an interview with SEEMO, journalist and blogger Magdalina Guenova said, "Money allocated to the media mostly comes from EU funds and programs, not state subsidies. This is the main way of pressuring media, even those that are relatively independent. The country has been stagnating since 2008, so regular businesses do not invest much in advertising; EU funds are the only regular source of income."[15]

"One of the main problems facing the media in Bulgaria right now is the financial funds that are coming from the European Union," Maria Neikova, associate professor at the Faculty of Journalism and Mass Communications at Sofia University St. Kliment Ohridski, told SEEMO. "This money is being distributed to media outlets by the ministries, in order to advertise the implementation of various EU policies in Bulgaria. This state financing of the media is somewhat hidden, since we don't have details about the allocation process: which media receive money, what the criteria are for a media outlet to be eligible for that, and how the money is distributed within outlets."[16]

"Legal and institutional guarantees for freedom of expression in Bulgaria are strong in theory", according to a journalist interviewed by SEEMO who requested anonymity. "I would not say there is clear, open restraint on journalists and editors, but rather a subtle pressure regarding what to write and what not to write."[17]

Since most media belong to powerful commercial or political interests, "there is basically no need for [governmental] pressure, since there is already no freedom", media analyst Stoyko Stoykov told SEEMO.[18]

"There is a lot of pressure on journalists from the side of owners and editors," Dzhambazova added. "Unofficially, you can tell by the articles that are being published and the way of writing exactly who is behind that outlet. I've heard of several instances where stories have been 'killed' because they were considered inconvenient.[19]

The concentration of media and non-transparent ownership structures, especially in print media, are a major obstacle for media freedom in Bulgaria. New regulations are needed to provide financial transparency and clear information about media ownership. Official documents of ownership in the broadcasting sphere exist, but aside from being only available in Bulgarian, they often provide insufficient information to determine actual ownership.[20] Data currently supplied by the Council of Electronic Media[21] is incomplete.

Shifting and non-transparent media ownership structures is a significant part of the problem. Many media outlets have been sold—at least nominally—to off-shore and foreign companies for undisclosed sums without the terms being made public.[22]

The gap between pro-government and other media becomes especially evident during election periods, and some observers say that political parties have often paid for positive media coverage.[23] There are some indications that media performance in election periods is becoming less partial, but the predisposition of many outlets towards particular political parties still appears to seriously influence coverage. The Council for Electronic Media, which monitors election reporting, has concluded after past elections that many media outlets showed serious bias.[24]

Bulgarian NGOs working on media and freedom of expression issues, including the Association of European Journalists in Bulgaria, the Media Democracy Foundation, and Open Parliament, are active in their efforts to oppose "soft censorship". However, they face strongly entrenched political and business interests that seek to perpetuate and expand its influence.[25]

State Funding of Media Outlets

During the 2007-2012 period, 71,637,781 BGN (36.6 million EUR)[26] was spent on communication campaigns of EU operational programmes and within the Rural Development Programme.[27] The total budget for advertising for the 2007-2014 period was 165 million BGN (84.3 million EUR).[28] It is important to note that print media received more than 7.2 million BGN (3.6 million EUR), but the distribution of the funds between outlets is not clear because contracts between the ministries and media were concluded by advertising agencies and other intermediaries.[29] Therefore, data on the financing of specific print media outlets is missing in this analysis.

As a whole, the insufficiency and fragmented character of available data regarding circulation and audience figures in Bulgaria must be taken into consideration. This report attempts to reconstruct and systematize as accurately as possible the larger picture. However, the overall picture is difficult to assemble due to fragmentation of information. The Bulgarian government only began providing systematic data from 2015 onwards.

The Digitalization Campaign (2013)

The transition to digital television broadcasting was supported by an intensive awareness campaign in the media. In 2013, the state paid 19 million BGN (9.7 million EUR) for this campaign.[30] As the table in Fig 1 shows, in many cases allocation of funds for the digitalization campaign was not related to the media outlets' distribution or audience figures. The radios *Darik* and *BNR* did not receive any money, despite together covering 37.5 percent of the total audience. *NJoy* received 20 percent of total funds allocated to radio with only 11.2 percent of overall audience share.

The text of the document for public procurement awarding procedures by which the Ministry of Transport, Information Technology and Communications announced a tender for organising this information did not include any requirement to follow audience measurements.

The TCTV consortium won the contract.

Initially, representatives of the consortium did not provide information on the media selected to serve as information channels for the campaign (this was clear only later when data for the allocated funds was published). The representatives of TCTV stated only that the

MEDIA (selection)	CIRCULATION/SHARE[31]	FUNDS RECIEVED DURING DIGITALIZATION CAMPAIGNS (2013)[32] BGN (EUR)
National print media	Average circulation (2013)	
Standard News	65,000	138,180 BGN (70,764 EUR) (fourth biggest recipient of funds)
Presa	62,000	75,300 BGN (38,562 EUR) (sixth biggest recipient of funds)
Leading tabloids		
Telegraph	145,000	221,052 BGN (113,203 EUR) (second biggest recipient of funds)
Bulgaria Today	88,000	37,370 BGN (19,138 EUR) (eleventh biggest recipient of funds)
Total press		**1,316,880 BGN (674,392 EUR)**
National radio stations	Percentage audience share (1st semester 2013)	
Darik Radio	15.5 percent	does not participate
N-JOY	11.2 percent	19,087 BGN (9,774 EUR)
Bulgarian National Radio, Horizont	22 percent	does not participate
Total radio		**98,869 BGN (50,632 EUR)**
Television	Percentage audience share	
bTV	31.13 percent	2,575,915 BGN (1,319,160 EUR) (biggest recipient of funds)
Nova	17.7 percent	2,240,624 BGN (1,147,453 EUR) (second biggest recipient of funds)
BNT1	6.85 percent	209,514 BGN (107,295 EUR) (seventh biggest recipient of funds)
Satellite/ Cable/ Digital (leading channels)		
TV Evropa	no data	does not participate
Bulgaria on Air	no data	45,680 BGN (23,393 EUR)
Total TV		**8,397,026 BGN (4,300,228 EUR)**
Internet (leading portals)	real users	
dir.bg	no data for real users, 4th position	no data
gbg.bg	633,301 real users, 15th position	no data

Fig 1. *Please note that the tables cited in this report are incomplete due to a lack of available official information on circulation and the allocation of funds

media were selected on the basis of "viewing and influence" and should reach at least 97% of the Bulgarian population (for broadcast media - cited in the report), and that a detailed analysis of the media permitted to be involved in the campaign had already been made. However, there was no additional information regarding the selection criteria.

MEDIA (selection)	CIRCULATION/ SHARE	EU OPERATIONAL PROGRAMME 2007-2012[33]	EU OPERATIONAL PROGRAMME (June 1, 2013- April 2, 2014)[34]
National print media		no data	no data
Total print spending		**7,272,851 BGN (3,724,523 EUR)**	**no data**
National radio stations	Percentage audience share (1st semester 2013)		
Darik Radio	15.5 percent	4,245,506 BGN (2,174,180 EUR) (first position)	1,048,644 BGN (537,025 EUR) (first position)
BTV Radio Group (N-JOY, Z-ROCK, Melody, 101.1 PRO FM Sofia, Jazz FM and Classic FM)	11.2 percent	1,243,545 BGN (636,836 EUR) (fourth position)	399,911 BGN (204,800 EUR) (sixth position)
Bulgarian National Radio, Horizont	22 percent	1,897,882 BGN (971,931 EUR) (second position)	163,778 BGN (83,873 EUR) (13th position)
Total radio		**10,747,808 BGN (5,505,095 EUR)**	
Televisions	Percentage audience share		
bTV	31.13 percent	5,138,334 BGN (2,631,409 EUR) (second position)	435,452 BGN (223,000 EUR) (fifth position)
Nova	17.7 percent	5,824,081 BGN (2,982,589 EUR) (first position)	917,211 BGN (496,716 EUR) (second position)
BNT	6.85 percent	2,594,373 BGN (1,328,613 EUR) (third position)	136,992 BGN (70,155 EUR) (14th position)
Satellite/ Cable/ Digital			
TV Evropa	no data	988,920 BGN (506,439 EUR) (fifth position)	does not participate
Bulgaria on Air	no data	does not participate	662,367 BGN (339,207 EUR) (third position)
Total TV		**19,135,277 BGN (9,800,000 EUR)**	
Internet (leading portals)	real users		
dir.bg	no data for real users, 4th position	no data	no data
gbg.bg	633,301 real users, 15th position	no data	no data
Total Internet		**825,773 BGN (422,890 EUR)**	

Fig 2. *Please note that the tables cited in this report are incomplete due to a lack of available official information on circulation and the allocation of funds

EU Operational Programmes Campaigns

Limited data on amounts allocated for the EU operational programmes campaigns indicate that the funding decisions do not reflect audience measurements.

Recent data was obtained from media outlets for the purpose of journalistic investigations under the Access to Public Information Act. For example, in 2014, *Capital* newspaper requested a report on funds directly provided to print media by ministerial authorities for coverage and advertising (outside the promotion of the EU operational programmes) in the 2013-2014 period. From the beginning of 2014 until October 2014, the Ministries of Education, Health, Transport and Economy and Energy provided 2.4 million BGN (1.2 million EUR) to print media from their own budgets.[35]

In 2014, the government released information on 6,280,000 BGN (3,216,071 EUR) spent to promote EU operational programmes from June 2013–April 2014. According to an analysis by *Capital,* "[A]mong televisions, TV7, close to the incumbents during several consecutive governments, is the largest beneficiary in terms of newly-contracted funds".[36]

After a request by the *BGNES* news agency, the Central Coordinating Unit, together with the Council of Ministers, published a report on the budget for media promotion of EU programmes covering August 2014 to February 2015.[37] Over BGN 6 million (around 3 million EUR) was used for the promotion of the EU programmes. The *BGNES* analysis concluded that "concentrating the funds for the promotion of EU programmes mostly on five to six television stations and two to three radio stations continues."[38]

Several observations can be drawn from the latest official report published in April 2015:

The ten biggest recipients of EU funds from August 2014 to February 2015 were:

1. *bTV Media Group* – 1,938,820 BGN (992,895 EUR)
2. *Bulgarian National Television (BNT)* – 1,457,996 BGN (746,659 EUR)
3. *Nova Broadcasting Group* – 1,094,024 BGN (560,264 EUR)
4. *Radio Focus* – 886,834 BGN (454,159 EUR)
5. *Darik Radio* – 798,004 BGN (408,668 EUR)
6. *Bulgaria On Air* – 687,654 BGN (352,157 EUR)
7. *TV Europe* – 532,224 BGN (272,558 EUR)
8. *Bulgarian National radio (BNR)* – 410,904 BGN (210,429 EUR)
9. *Channel 3 TV* – 324,000 BGN (165,924 EUR)
10. *bTV Radio Group* – 288,850 BGN (147,924 EUR)[39]

Generally, broadcast media with the largest audiences receive the greatest amount of public financing. However, there is no regulation saying that the allocation of funds must reflect audience measurements; and there is no official data on circulation and audience. If the allocation of funds reflects audience reach, it is beyond any regulation and is the result of a subjective decision.

Moreover, the effectiveness of awareness campaigns carried out through the biggest national media outlets is questionable. Overall audience size and revenues of the media outlet are non-sufficient criteria for determining advertising allocations. More precise and effective targeting for audience reach is required, rather than simply seeking broad publicity, which could be both meaningless and inefficient. There has been an imbalance in the financing of smaller and regional media outlets during different periods.[40] Certain programmes have a stronger regional orientation or reach specific audiences.

The Public Procurement Act does not

provide equal treatment to broadcast and print media regarding the contract award procedures, contributing to the overall distortion of the media environment. Broadcast media are allowed to contract directly with ministries without public procurement procedures, while funds for print and Internet publications are distributed through tenders. Allocations to print media are often channelled through advertising and public relations agencies, making the process less transparent; only the amounts paid to the agencies, not to the publications, are listed in official records. In both cases (direct contracting and public procurement), media outlets, advertising and PR agencies close to political incumbents have opportunities to benefit from the situation.[41]

In some instances, media receive official allocations that are exempt from any public procurement procedure. It is impossible to determine the fairness of such arrangements.[42]

An analysis by the newspaper *Capital* revealed that certain media are awarded a significant number of contracts under certain governments but lose financing during the terms of others, while there are other media outlets that are "favourite" to more than one government. There is sometimes no clear relation between the amount of the financing received and the popularity of the respective media outlet.

The selection criteria for electronic media involved in the campaign for digitization are based on "viewership and influence", and require that the outlet reach at least 97 percent of the Bulgarian population.[43] At the same time, considerable advertising funds are directed to interrelated media and digital networks that have significant political influence.[44] The effectiveness of the digitization awareness campaign has not been proven.[45]

There are widespread concerns regarding how EU funds are distributed among media outlets. For example, in 2013, a wiretapped conversation between the prime minister, a prosecutor and a minister was leaked to the media. During the conversation, the minister complained about the media's attitude toward him, given that "we provided technical assistance to all of them" in reference to the distribution of funds.[46] This example shows the expectation of the power-holders about a favourable attitude of the media towards the government in exchange of the provision of funds under the EU programmes. A 2013 scandal involved the Rural Development Programme, which awarded 100,000 BGN (around 51,000 EUR) for the development of a Facebook page.[47]

The impact of such practices on media freedom is highly negative. Many outlets that are chronically short of funding compromise editorial integrity by offering favourable coverage of official institutions in exchange for financing. Despite numerous journalistic revelations regarding selective state advertising allocations, there have been no official investigations.

State advertising has considerable weight in the overall amount of media sector financing, and on print publications in particular. In Bulgaria's relatively small market, the media are often highly dependent on this type of financing. Media criticism of dubious practice is usually either softened or appears only in critically oriented independent media outlets that offer quality reporting. The newspaper *Capital* is an example; it has investigated soft censorship issues for several years.

"There are radio stations with no ratings and TV channels I've never heard of that receive state subsidies," Ljupco Neshkov, founder of BGNES news agency, told SEEMO during a recent interview. "Non-transparent distribution of funds between the government and the media is the second instrument (in addition to opaque media ownership) through which the dependency of media outlets is maintained"[48]

The National Communication Strategy 2014-2020: A Path to Reform?

In September 2014, the government published the new National Communication Strategy 2014-2020.[49] This sets the "framework of strategic communication for the 2014-2020 programming period" and "has been drafted in compliance with Article 116 of Regulation No. 1303 of the European Parliament and of the Council of 17 December 2013". Published alongside are *A Uniform Handbook of the Beneficiary for Application of the Rules of Information and Communication 2014-2020* and an Appendix containing "Provisional activities in regards to the target groups of the National Communication Strategy". These documents outline requirements for official awareness campaigns and establish oversight procedures.

The new strategy contains an analysis of the communication strategy implemented during the 2007-2013 programming period. Along with several achievements, the analysis highlights several "common critical areas", including:

- Failure to apply a uniform methodology for following the awareness, information and attitudes of the general public and the diverse—in terms of profile—target groups among the interested parties;
- Lack of regular opinion polls;
- Intermittent monitoring of media publications;
- The planned budgets are not evenly disbursed, and there is little capacity for systematic analyses of communication and information needs and the orientation of communications on the basis of these needs;
- Limited competition in selecting media beneficiaries signals favouritism and non-transparency in the decision-making process. Even when a media outlet is selected through public procurement, "there are often strongly restrictive conditions that indicate a favoured bidder. The excessively detailed requirements towards the experts needed and for presenting certificates are often a sign of irregularities", according to an investigation by *Capital*.[50]

Funding eligibility criteria and the bases for funding particular media or advertising agencies often remain unclear. Reporting on implemented projects lacks sufficient publicity. There has been some progress since 2013, when reports on the distribution of funds were first published, but greater political will is required to raise transparency in the distribution of state funds for advertising.

Government representatives have recently expressed a new commitment to developing clearer instructions for all authorities responsible for contracting with the media, including readiness to discuss the draft awareness and publicity strategy for the 2014-2020 programming period and means to increase the transparency of procedures with media and advertisers.[51] However, there are no concrete results to date.

In 2014, the Association of European Journalists in Bulgaria, along with other NGOs, initiated a discussion on the accumulated challenges that face Bulgarian media. Important proposals were submitted to the government

and discussed with its representatives. Portions of the proposals were included in the government's Programme on Steady Development of the Republic of Bulgaria 2014-2018. In particular, the programme includes the following priority related to soft censorship:

Priority 18.1.

Development of a public and legislative environment that guarantees media independence and pluralism, transparency and publicity of media ownership and control.

Responsible institutions: Council of Ministers

Objective 1: Legal changes for ensuring transparent and competitive media environment

Measures:

- Discussion of the possibilities to introduce a legislative requirement that would allow the media to participate as contractors or subcontractors after they have declared compliance with the norms of the Ethical Code of the Bulgarian Media and the National Ethical Rules for Advertising and Commercial Communication in public procurement contracts.
- Discussion of prohibiting the provision of public funds directly or indirectly to media, which have not fulfilled all legislative requirements for transparency of ownership under the Act on Mandatory Depositing of Print and Other Works and to electronic media that have not provided easy, direct and permanent user access to up-to-date information about the actual owner on their websites.

Legal and Institutional Framework

"The Constitution of Bulgaria (1992) adopted after the democratic changes in 1989 provides for freedom of expression and freedom of the press and prohibits censorship (articles 39, 40 and 41). Bulgaria ratified the European Convention on Human Rights in 1992, becoming a member of the Council of Europe. Since 2007, Bulgaria has been a member of the European Union. While print media are treated as free business entities, the Radio and Television Act (1998, amended) regulates broadcast media. Amendments have harmonised it with the European legislation and enshrine the provisions of the Audio-visual Media Services Directive (2010) into domestic law.

Broadcast media in the country are regulated by the Law on Radio and Television and the Electronic Communications Act. The regulatory body is the Council of Electronic Media (CEM).[52] The CEM is an independent body, but its budget is allocated by Parliament, allowing potential political influence. Media observers say that it has been a common practice for governments to change the CEM leadership to make the body more amenable to their interests.

The Internet is not regulated and has to date developed as Bulgaria's most open space for free exchange of information and discussion.

Ethics commissions have been established for all types of media. "At the moment there are three such commissions, one with the Union of Bulgarian Journalists (UBJ), one overseeing media that have signed the Ethical Code in 2002 that operates under the auspices of the National Council for Journalistic Ethics (2005), and one set up by the media members of the New Bulgarian Media Group (NBMG), the largest media group in the country," media consultant Bissera Zankova recently explained in an interview with SEEMO. The impartiality and effectiveness of these three bodies is yet to be fully tested.

Fines and Other Financial Threats

"It is not necessary to physically hurt journalists in Bulgaria; it is much 'cleaner' to take them to court and try to make their lives miserable," Magdalina Guenova, freelance journalist and blogger, told SEEMO.[53]

Bulgarian law allows the Bulgarian Financial Supervision Commission (FSC), a regulatory body substantively unrelated to the media sector, to impose high fines on media outlets and practitioners if false of harmful information has been disseminated. However, this is often used in order to suppress any effective media coverage of harmful or dubious banking practices.[54]

In January 2015, the FSC imposed a fine of BGN 160,000 (EUR 80,000) on media business group Economedia. The penalty was ordered after articles published by the dailies *Capital* and *Dnevnik* in 2014 were labelled as market manipulation because they discussed bank activities, and because the media group refused to reveal its sources.[55]

Alpico Publishing and its online news outlet *zovnews.com* were penalized with a BGN 100,000 [EUR 50,000] fine in January 2015 after reporting on the banking sector. In December 2014, the Financial Supervision Commission ordered *Bivol.bg,* a news website that investigates corruption cases, to reveal their sources for stories they published regarding bank loans.[56] The case remained open as of February 2016.

Large fines can lead to self-censorship in reporting, which is especially dangerous when it comes to public interest matters. "Journalists have to fear charges, they can be sued, and considering the problematic rule of law in the country, it can easily happen that the court will rule against the media," commented Magdalina Guenova.[57]

An example of this type of harassment was described by Vassil Sotirov, foreign news editor at BTA, and Svetoslav Terziev, journalist at the daily *Sega:* "The government is taking subtle, but obvious actions to silence journalists. Recently, a local newspaper was prosecuted for its coverage of a flooding incident. The journalist was accused of spreading panic, but was prosecuted in another town because of the bias and prejudice from the judiciary in his city. He was acquitted of his charges".[58]

Alexander Kashumov, head of the Legal Team at the Access to Information Foundation, observes, "Right now, there is a shift from 'legal censorship' to 'economic censorship'. Unlike the 1990s, when journalists could go to jail for defamation charges, and the 2000s, when there was a lot of legal action undertaken against them, today journalists are more frequently subject to economic influence and pressure. The market is very small, and an independent journalist is not always what editors and owners of media want. Of course, there are levels: journalism is more financially dependent in big broadcast media, because they are more commercial. With smaller outlets, it can be different, and there are some commercial stations that encourage investigative journalism."[59]

Zovnews.com journalist Maria Dimitrova describes a trend towards media consolidation. In her opinion, some large media groups now "own the publishers, the publishing agencies, the media distributors, so it is easy for them to remove the competition. They can set high prices, making it difficult for an outlet to distribute their paper, and gain advantage".[60] Economic pressure, aside from fines and using state advertising and funds, is also exerted on some print media when distributors refuse to

circulate selected publications or shops refuse to sell them. Control over distribution became easier when distribution shifted to shops, shopping centres and gasoline stations after the closure of many newspaper kiosks.

During a June 2015 interview with SEEMO, *BGNES* news agency head Ljupco Neshkov gave a vivid example how the state allegedly controls media output. According to Neshkov's report, an international financial expert stated during a country visit that Bulgaria's political scene and foreign business investment should be kept separate because of political corruption. This comment was quoted on the *BGNES* website. Neshkov soon received a phone call from a government employee who demanded the article be changed. A new, almost entirely revised version was received from the official, followed by a series of calls and text messages asking when the changes would be made. Neshkov refused to alter the article, and has allowed SEEMO to describe this incident, commenting, "Politics and business are inseparable in Bulgaria; we have an oligarchic system".[61] Experts on Bulgarian media report that few media outlets are able or willing to reject this sort of pressure—and even fewer are willing to speak about it publicly.

In addition, many Bulgarian journalists are afraid of losing their jobs because of poor economic conditions. The closure of *Presa* and *Tema* in summer 2015 resulted in 130 journalists losing their jobs. A dire economic environment for media companies means that journalists who still have jobs may accept self-censorship—writing according to the wishes of a supervisor, or not reporting at all about some topics—in order to avoid problems with the owners and remain employed.

Vassil Sotirov, BTA foreign news editor, says that journalists' working conditions create further challenges: "Economic pressures are probably the most serious issue. Pay is miserably low, if you receive a regular salary at all; our colleagues at *Standard* recently had not received their pay in three months. There is no social insurance, and pensions are also very low. Owners of media outlets use this situation to pressure journalists, but journalists still work, because they need to."[62]

Other Administrative Pressures

Various types of administrative pressures are visible. Editors told SEEMO that some state bodies, such as labour or tax authorities, have inspected media that publish critical reports more often than other media companies for longer periods.

Politicians, directly or via their staff, sometimes call or send SMS or email complaints to owners, editors-in-chief and journalists. Journalists have little recourse when an editor removes "problematic parts" or adds material to an article. Web-editors moderating comments decide whether not to publish some critical voices or to publish views promoting one political opinion. A former newspaper staffer told SEEMO, "Sometimes the web-editor writes his or her own comment under a false name and promotes this as the view of a reader".

In addition, journalists from a number of media outlets interviewed explained of selective access to government officials and events. Officials sometimes refuse to participate in a TV or radio talk show or give an interview or a statement to a journalist from a "negative" media outlet. Another form of political or business influence on media described by interviewees is the practice of some governmental institutions of giving media awards to journalists who cover them favourably.

Corruption and Lack of Transparency

In 2014, Bulgaria ranked lowest of all EU countries on the corruption perceptions index published annually by Transparency International, and was 69th of 175 countries rated worldwide.[63] Cases of corruption in Bulgaria are rarely formally identified and there are nearly no judicial investigations.

Corruption in legislative institutions makes reform difficult, and entrenched organized crime and discrimination compound this difficulty. The overall political system is inefficient and stagnant, including parts of the judiciary. Business owners and political figures often use legal action to harass journalists .

"Not one high-ranking official has been to jail for corruption, while Bulgaria and the Balkans are bursting with it. The system is the problem here, and since it too is corrupt, there is a lack of transparency on all levels," Ljupco Neshkov, journalist and head of BGNES news agency told SEEMO, adding "People have lost their faith in the media as well as the government."[64]

Alleged corrupt practices have contributed to shaping the media landscape. In 2014, the Corporate Commercial Bank (KTB) filed for bankruptcy, after what was discovered to be months of self-funding to intermediary companies. Business relations were revealed between the bank owner, Tsvetan Vassilev, and Irena Krasteva, the owner of the companies that the bank was funding. Both Krasteva and Vassilev categorically denied that KTB was financing the New Bulgarian Media Group (NBMG) despite other observers alleging there was a strong link.[65]

The 2000 Access to Public Information Act provides access to public information that is created by or kept with state bodies, their regional offices, and the local self-governance bodies. However, individuals as well as journalists face many obstacles when asking state institutions for documentation or information. A yearly audit on transparency is conducted by the Access to Information Programme Foundation (AIP), which monitors and seeks to improve access to information in Bulgaria. According to Alexander Kashumov, head of AIP's legal team, "When you ask for high-profile information regarding public figures, it is often denied, which is when you need to go to court and fight for it. It is very cheap to start a lawsuit (about 5 EUR), but the process usually lasts a year or more, which is only useful for journalists if they are doing longer investigative stories".[66]

Harder Forms of Censorship: Attacks and Threats

Harder forms of censorship also come in the form of threatening phone calls and other types of intimidation.

Journalists were attacked and harassed by policemen and others during protests that called for the resignation of the government from May 2013-July 2014.[67] In 2012, Spas Spasov, a correspondent for dailies *Capital* and *Dnevnik* in Varna, was sent a copy of Sun Tzu's *The Art of War,* inscribed with a threatening dedication.[68] Journalist Lidia Pavlova, received numerous threats for her investigative work.[69] In 2012, her car was set on fire.[70] In September 2013 and in April 2014, bTV host Genka Shikerova's car was vandalised and set on fire.[71] Impunity for crimes against journalists is the norm, encouraging self-censorship and further attacks.

Judicial processes in Bulgaria can be complex and very lengthy. According to journalist Maria Dimitrova, this is one reason that "personal assaults are more common than taking journalists to court; people in Bulgaria don't tend to resolve disputes in a legal manner. But rather than physical threats, you receive a threatening phone call, an insult or something similar."[72]

Conclusion

There is little progress in combating the rising tide of soft censorship in Bulgaria. Despite some government and NGO initiatives, even baseline requirements to assess the true extent of soft censorship, such as official documents regarding the allocation of funds to media outlets, are still unobtainable or simply do not exist.[73]

Economic, administrative, and political pressures have degraded the journalistic profession, leading to widespread self-censorship among journalists. Bulgaria's locally generated media content largely fails to meet standards of high-quality professional journalism.

Bulgaria's media were sharply affected by the financial crisis, and many media outlets closed. State regulators have done little to combat the resultant media concentration. Political influence is acute and widespread. Pluralism is now expressed principally through individual users on social media and blogs.

Print media are increasingly dependent on advertisers due to shrinking newsstand sales. The national and local allocation of funds to media in exchange for favourable reporting on government is a major problem. A paucity of other revenue streams has engendered a certain type of media that shifts editorial policies and pays little heed to professional standards.

The media oligopoly in Bulgaria is growing stronger and consolidating as powerful individuals acquire more media assets, from newspapers and their distributors to printing companies, websites, networks, and fixed line operators. These acquisitions have gone entirely unchecked by the government, an indicator of the close ties between the political, business and power centres in Bulgaria. Public interest reporting is not valued or promoted, and there is a broad lack of support for investigative journalism.

Social, ethnic and national tensions complicate Bulgaria's efforts to implement EU regulations. Media cannot properly contribute without serious structural reform in society. A comprehensive restructuring of the ownership system, realizing financial transparency in all state dealing with media, and raising journalistic standards must be prioritised to rebuild an independent and pluralistic media that fosters public awareness and dialogue.

Annex

Table of interviewees*

1. Miroluba Benatova, investigative reporter, *Teleman/NOVA TV,* Sofia
2. Tzvetina Borisova, freelance journalist, Sofia
3. Ognian Dimitrov, freelance journalist, Sofia
4. Maria Dimitrova, journalist, *zovnews.com,* Sofia
5. Boryana Dzhambazova, freelance journalist, Sofia
6. Magdalina Guenova, freelance journalist and blogger, Sofia
7. Alexander Kashumov, Head of Legal Team, Access to Information Programme
8. Maria Neikova, Associate Professor, Faculty of Journalism and Mass Communication, Sofia
9. Foundation, Sofia
10. Ljupco Neshkov, journalist and founder of *BGNES,* Sofia
11. Vassil Sotirov, foreign news editor, *BTA,* Sofia
12. Nickolay Stoyanov, journalist, *Capital,* Sofia
13. Stoyko Stoykov, media analyst, Sofia
14. Svetoslav Terziev, journalist, *SEGA,* Sofia
15. Bissera Zankova, media consultant, Sofia

*Additional sources who preferred to speak to SEEMO on condition of anonymity

Endnotes

1. Bulgaria National Statistical Institute, Total Population, available at: http://www.nsi.bg/sites/default/files/files/pressreleases/Population2014_en_2Y19BGI.pdf
2. Bulgaria National Statistical Institute, GDP growth rate, *First quarter of 2015, available at: http://www.nsi.bg/sites/default/files/files/pressreleases/GDP2015q1_en_YGO7U7C.pdf
3. National Statistical institute, Unemployment rate, *First quarter of 2015, available at: http://www.nsi.bg/sites/default/files/files/pressreleases/LFS2015q1_en_MYJBJOD.pdf
4. UNICEF Bulgaria, Adult literacy Rate, available at: http://www.unicef.org/infobycountry/bulgaria_statistics.html
5. European Commission, Internet users, available at: https://ec.europa.eu/digital-agenda/sites/digital-agenda/files/BU%20internet%20use.pdf
6. European Commission, Digital Agenda, Bulgaria, available at: https://ec.europa.eu/digital-agenda/en/country/bulgaria
7. European Commission, Digital Agenda, Bulgaria, available at: https://ec.europa.eu/digital-agenda/en/country/bulgaria
8. Transparency International rank, available at: http://www.transparency.org/country#BGR
9. Freedom House, Bulgaria country profile, available at: https://freedomhouse.org/country/bulgaria#.VbeR9vmqqko
10. Reporters without Borders, 2015 World Press Freedom Index, available at: https://index.rsf.org/#!/
11. IREX, Bulgaria Media Sustainability Index, available at: https://www.irex.org/resource/bulgaria-media-sustainability-index-msi
12. Reporters Without Borders, 2015 World Press Freedom Index, available at: http://index.rsf.org/#!/
13. European Commission, Bulgaria to the EU Anti-Corruption Report (2014), available at: http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/organized-crime-and-human-trafficking/corruption/anti-corruption-report/docs/2014_acr_bulgaria_chapter_en.pdf
14. Freedom House, Bulgaria Freedom of the Press 2014, available at: https://freedomhouse.org/report/freedom-press/2014/bulgaria#.VWoh_dKqpHy
15. Magdalina Guenova, freelance journalist and blogger, SEEMO interview, June 2015.
16. Maria Neikova, professor Faculty of Journalism and Mass Communications, Sofia University St Kliment Ohridski, SEEMO interview, June 2015.
17. Anonymous journalist, SEEMO interview, June 2015.
18. Stoyko Stoykov, media analyst, SEEMO interview, June 2015.
19. Boryana Dzhambazova, freelance journalist, SEEMO interview, June 2015.
20. Communications Regulations Commission, Public registers, available at: http://www.crc.bg/section.php?lang=en&id=264
21. Website of the Council of Electronic Media, available at: http://www.cem.bg
22. Novinite.com (20 November 2012) "London-Based Alegro Capital Acquires Bulgaria's TV7", available at: http://www.novinite.com/articles/145309/London-Based+Alegro+Capital+Acquires+Bulgaria's+TV7

23. Capital (19 April 2013) "Nepriiatnata Strana Na Istinata" (Unpleasant Side of Truth), available at: http://www.capital.bg/biznes/media_i_reklama/2013/04/19/2045124_nepriiatnata_strana_na_istinata/
24. Council for Electronic Media, Elections coverage, available at: http://www.cem.bg/controlbg/599
25. Open Parliament – Civic Voices initiative, available at: http://openparliament.net/agenda/view-97
26. Exchange rate as of 5 November 2015 (1 BGN = 0,51 EUR)
27. Open Parliament – Civic Voices initiative, available at: http://openparliament.net/agenda/view-97
28. Capital (2 September 2011) "Slon V Medien Magazin" (Elephant in the Media Market), available at: http://www.capital.bg/politika_i_ikonomika/bulgaria/2011/09/02/ 1149712_slon_v_medien_magazin/
29. Open Parliament – Civic Voices initiative, available at: http://openparliament.net/agenda/view-97
30. Capital (19 August 2013) "Nai Skupata Kampaniia" (Most Expensive Campaign), available at: http://www.capital.bg/biznes/media_i_reklama/2013/08/19/2125491_nai-skupata_kampaniia/
31. Piero97.com, Bulgarian Media Market, available at: http://www.piero97.com/Medien-pazar?map
32. Capital (19 August 2013) "Nai Skupata Kampaniia" (Most Expensive Campaign), available at: http://www.capital.bg/biznes/media_i_reklama/2013/08/19/2125491_nai-skupata_kampaniia/
33. Open Parliament – Civic Voices initiative, available at: http://openparliament.net/agenda/view-97
34. *Capital* (21 April 2014) "*Darik Radio* and *Nova* receive most EU funds money for advertising", available at: http://www.capital.bg/politika_i_ikonomika/bulgaria/2014/04/21/ 2285483_darik_radio_i_nova_sa_s_nai-mnogo_pari_za_reklama_na/
35. *Capital* (31 October 2014) "Media under State Order", available at: http://www.capital.bg/biznes/media_i_reklama/2014/10/31/ 2410745_medii_po_durjavna_poruchka/
36. *Capital* (21 April 2014) "*Darik Radio* and *Nova* receive most EU funds money for advertising", available at: http://www.capital.bg/politika_i_ikonomika/bulgaria/2014/04/21 /2285483_darik_radio_i_nova_sa_s_nai-mnogo_pari_za_reklama_na/
37. EU Structural Funds, available at: http://www.eufunds.bg/bg/pubs/7713
38. BGNES analysis available at: http://news.bgnes.com/view/1222396
39. *Capital* (29 April 2015) "Victory of Transparency: Registry of EU Money to Media", available at: http://www.capital.bg/politika_i_ikonomika/bulgaria/2015/04/29/ 2522137_pobeda_na_prozrachnostta_veche_ima_registur_na/
40. More details can be found in *Capital* (21 April 2014) "*Darik Radio* and *Nova* receive most EU funds money for advertising", available at: http://www.capital.bg/politika_i_ikonomika/bulgaria/2014/04/21/2285483_darik_radio_i_nova_sa_s_nai-mnogo_pari_za_reklama_na/
41. Mediapool.bg (20 March 2015) "Cabinets Bliznashki and Borisov 2 spent 900,000 BGN monthly of EU funds for advertising", available at: http://www.mediapool.bg/kabinetite-bliznashki-i-borisov-2-sa-harchili-po-900-000-lv-mesechno-za-reklama-na-evrofondovete-news231917.html
42. Capital (31 October 2014) "Media Under State Order", available at: http://www.capital.bg/biznes/media_i_reklama/2014/10/31/ 2410745_medii_po_durjavna_poruchka/
43. Capital (19 August 2013) "Nai Skupata Kampaniia" (Most Expensive Campaign), available at: http://www.capital.bg/biznes/media_i_reklama/2013/08/19/2125491_nai-skupata_kampaniia/
44. Ibid.

45. Capital (8 October 2013) "Nearly a million BGN for advertising of digitization", available at: http://www.capital.bg/biznes/media_i_reklama/2013/10/08/ 2156784_oshte_blizo_milion_leva_za_reklama_na_cifrovizaciiata/
46. Capital (29 April 2015) "Victory of Transparency: Registry of EU Money to Media", available at: http://www.capital.bg/politika_i_ikonomika/bulgaria/2015/04/29/ 2522137_pobeda_na_prozrachnostta_veche_ima_registur_na/
47. Capital (10 October 2014) "Oresarski and media", available at: http://www.capital.bg/biznes/media_i_reklama/2014/10/10/2397828_oresharski_i_mediite/
48. Ljupco Neshkov, head of BGNES news agency, SEEMO interview in June 2015.
49. National Communication Strategy 2014-2020, available at: http://www.strategy.bg/publicconsultations/View.aspx?lang=bg-BG&Id=1435
50. *Capital* (2 September 2011) "Slon V Medien Magazin" (Elephant in the Media Market" available at: http://www.capital.bg/politika_i_ikonomika/bulgaria/2011/09/02/ 1149712_slon_v_medien_magazin/
51. Actualno.com (8 July 2013) "Clear Rules for Funds Under Operational Programs for Media Promised by Zinaida Zlatanova" available at: http://society.actualno.com/Jasni-pravila-za-sredstvata-po-operativnite-programi-za-mediite-obeshta-Zinaida-Zlatanova-news_430676.html
52. Council of Electronic Media legislation, available at: http://www.cem.bg/infobg/57\
53. Magdalina Guenova, freelance journalist, SEEMO, June 2015.
54. Bivol (16 January 2015) "Bulgarian Financial Supervision Commission Is Destroying Media if They Write about Private Lender FIB", available at: https://bivol.bg/en/bulgarian-financial-supervision-commission-is-destroying-media-if-they-write-about-private-lender-fib.html. Also, please see OSCE (4 February 2015) "Large fines imposed on media outlets in Bulgaria may lead to censorship in reporting on issues of public interest, says Mijatović, available at: http://www.osce.org/fom/139001
55. Association of European Journalists (16 January 2015) "Unprecedented bureaucratic censorship applied on Bulgarian media", available at: http://www.aej-bulgaria.org/eng/p.php?post=2050
56. Reporters Without Borders (10 December 2014) ·Investigative News Sites Ordered to Name Souces", available at: http://en.rsf.org/bulgaria-investigative-news-site-ordered-to-10-12-2014,47363.html
57. Magdalina Guenova, freelance journalist and blogger, said during an interview for SEEMO, June 2015.
58. Vassil Sotirov, foreign news editor, BTA, Svetoslav Terziev, journalist, Sega daily paper, SEEMO interview, June 2015.
59. Alexander Kashumov, head of the Legal Team of AIP, in an interview for SEEMO, June 2015.
60. Maria Dimitrova, journalist, interview for SEEMO, June 2015.
61. Ljupco Neshkov, head of BGNES, in an interview for SEEMO, June 2015.
62. Vassil Sotirov, foreign news editor, BTA, SEEMO interview, June 2015.
63. Transparency International, Corruption Perceptions Index 2014, available at: http://www.transparency.org/cpi2014/results
64. Ljupco Neshkov, journalist and head of BGNES News Agency, SEEMO interview, June 2015.
65. The Economist (4 March 2014) "A controversial newcomer could be kingmaker", available at: http://www.economist.com/blogs/easternapproaches/2014/03/bulgaria

66. Alexander Kashumov, head of Legal Team, Access to Information Programme, June 2015.
67. IFEX (29 July 2013) "Police attack Bulgarian protesters at anti-government demonstration", available at: https://www.ifex.org/bulgaria/2013/07/29/bulgaria_investigate/
68. Novinite.com, http://www.novinite.com/articles/142326/SEEMO+Worried+by+Latest+Threats+against+Bulgarian+Journalist
69. Novinite.com (31 May 2012) "Courageous Bulgarian journalist subjected to threats", available at: http://www.novinite.com/articles/139825/Courageous+Bulgarian+Journalist+Subjected+to+Threats
70. Novinite.com (3 August 2012) "Bulgaria must reopen investigation of attack on journalist" http://www.novinite.com/articles/141975/SEEMO%3A+Bulgaria+Must+Reopen+Investigation+of+Attack+on+Journalist
71. Standart (2 April 2014) "Cart of TV host Genka Shikerova again set on fire", available at: http://www.standartnews.com/english/read/car_of_tv_host_genka_shikerova_again_set_on_fire_-3171.html
72. Maria Dimitrova, zovnews.com journalist, in an interview for SEEMO, June 2015.
73. Orlin Spasov, media expert, in an interview for SEEMO, June 2015.

March 2016