



# The Repression of Independent Media in Hungary, 2010–2025

---

Rule of Law Lab

 NYU | LAW



---

## **February 2026**

This report was prepared by Mertek Media Monitor and the Rule of Law Lab at New York University School of Law. It does not purport to present the institutional views, if any, of the New York University School of Law.

Cover Photo Credit: Moni Dusik

# Table of Contents

<b>Executive Summary and Recommendations .....</b>	<b>4</b>
<b>I. Introduction .....</b>	<b>9</b>
<b>II. The Evolution of Hungarian Media: Post-2010 Media Capture.....</b>	<b>10</b>
<b>III. Independent Media: The Fourth Estate .....</b>	<b>12</b>
<b>IV. Restrictions on Independent Media.....</b>	<b>13</b>
a. Weaponizing Laws Against Independent Media.....	13
i. Media Laws .....	13
ii. Freedom of Information Law .....	14
iii. Criminal Law .....	15
iv. Sovereignty Protection Act.....	15
b. Targeted Exclusion of Independent Journalists.....	16
i. Ignoring Journalistic Inquiries.....	16
ii. Excluding Reporters from Public Events and Press Conferences .....	16
iii. Restrictions on Parliamentary Reporting.....	17
iv. Denying Access to Public Institutions and Refugee Camps.....	17
c. Discreditation and Smear Campaigns Against Journalists .....	18
i. Blacklists and “Foreign Agent” Narratives .....	18
ii. Delegitimizing Independent Media as “Fake News Factories” .....	19
iii. Hate, Harassment, and Defamation of Individual Journalists .....	19
d. Strategic Lawsuits Against Public Participation (SLAPPs) .....	20
e. Unlawful Surveillance .....	21
f. Cyberattacks.....	22
<b>V. Conclusion .....</b>	<b>23</b>
<b>Endnotes.....</b>	<b>25</b>

# Executive Summary

Since 2010, as part of its broader effort to consolidate executive power, the Hungarian government has radically restructured the media sector by capturing large segments of the market and systematically obstructing the remaining independent outlets. Once pluralistic, Hungary's media landscape now serves as the most sophisticated example of media capture in the European Union (EU).<sup>1</sup> The ruling party, Fidesz, is estimated to directly or indirectly control roughly eighty percent of the country's media.<sup>2</sup> Hungarians' trust in news is amongst the lowest in Europe.<sup>3</sup> Between 2010 and 2025, Hungary's rank in Reporters Without Borders' World Press Freedom Index fell from 23<sup>rd</sup> to 68<sup>th</sup> out of 180 countries measured, leaving it among the lowest-ranked member states in the EU.<sup>4</sup>

The government's capture of the media sector, through its control of state-owned public service media, consolidation of private outlets under government-allied ownership, and diversion of state advertisement funds to government-friendly outlets, is well-documented.<sup>5</sup> Less well-documented are the government's systematic attempts to undermine independent media outlets, placing their continued existence in grave jeopardy.

This report provides a comprehensive account of the Hungarian government's escalating repression of independent media and offers recommendations for reform. The government has not needed to resort to overt censorship or imprisoning journalists in order to restrict independent media. It has used more sophisticated tactics to achieve that end. As described below, these tactics include: the weaponization of laws against independent media outlets; targeted exclusion of independent journalists; use of smear campaigns; Strategic Lawsuits Against Public Participation (SLAPPs); and unlawful surveillance. Independent media outlets have also been targeted with cyberattacks, although it has not been fully determined who is responsible for those attacks.

## i. Weaponizing Laws Against Independent Media

Following the 2010 parliamentary elections, the ruling Fidesz-KDNP party coalition used its two-thirds parliamentary supermajority to enact new media laws that fundamentally reshaped Hungary's media landscape.<sup>6</sup> The new legislation established the Media Council, a nominally independent regulatory body that in practice is composed entirely of Fidesz appointees and endowed with broad powers over print, online, and broadcast media.<sup>7</sup> The Media Council's lack of independence is reflected in many of its broadcast licensing and merger decisions displaying political bias in favor of pro-government media outlets and against independent media outlets.<sup>8</sup>

Successive amendments have systematically weakened the Freedom of Information (FOI) Act by narrowing the scope of accessible public data and allowing authorities to withhold disclosure in politically sensitive cases.<sup>9</sup> Amendments to the Criminal Code since 2012 have further restricted media freedom by introducing offenses related to "false" recordings and pandemic-era "disinformation."<sup>10</sup>

In recent years, the government has intensified its weaponization of laws to stifle independent media. In December 2023, Hungary's Parliament enacted the vaguely worded "Sovereignty Protection Act" which established a government office with broad powers to investigate anyone the authorities deem to serve foreign interests or present threats to national sovereignty.<sup>11</sup> In October 2024, the European Commission referred Hungary to the Court of Justice for the European Union on grounds that the Sovereignty Protection Act is in breach of EU law, including, *inter alia*, the rights to private life and freedom of expression and association.<sup>12</sup> Nonetheless, the Act has been weaponized against independent media outlets *Átlátszó* and *Telex*.<sup>13</sup>

In May 2025, Parliament introduced another vaguely worded draft bill titled, “Transparency in Public Life” which would enable the government to blacklist, defund, and subject to enhanced financial scrutiny any organization it designates as “a threat to Hungarian sovereignty.”<sup>14</sup> Although the draft was not adopted, it continues to pose a threat to independent media outlets as Prime Minister Viktor Orbán has publicly confirmed the government’s intention to enact it as law.<sup>15</sup>

## **ii. Targeted Exclusion of Independent Media**

Independent journalists face systemic barriers in accessing information from the Hungarian government. Their inquiries to the government are systematically ignored and they are routinely denied access to government events, press conferences, parliament, and other public institutions.<sup>16</sup> These practices contravene European Court of Human Rights (ECtHR) standards established in *Mándl v. Hungary* and *Szurovecz v. Hungary*, judgments which the Hungarian government has failed to implement.<sup>17</sup>

## **iii. Smear Campaigns Against Independent Media**

Since 2015, coordinated smear campaigns led by government politicians, state-aligned media, and affiliated actors have become a key instrument to delegitimize independent journalism. Critical outlets and journalists are routinely labeled as “foreign agents,” “dollar media,” or “fake news factories,” accused of acting against national interests.<sup>18</sup> These narratives, spread through publicly funded propaganda and online disinformation, create a hostile climate that undermines trust in independent journalism.<sup>19</sup> By 2024–25, smear tactics became more systematic and institutionalized.<sup>20</sup> The Sovereignty Protection Office opened investigations into independent media outlet Átlátszó, framing its work as a threat to national sovereignty and demanding access to confidential data.<sup>21</sup>

## **iv. Strategic Lawsuits Against Public Participation (SLAPPs)**

In Hungary, defamation claims under both civil and criminal law have long been used as tools to intimidate journalists.<sup>22</sup> However, more recently, alleged violations of the European Union’s General Data Protection Regulation (GDPR) have become the new basis for SLAPPs.<sup>23</sup> Hungary failed to enact legislation establishing exemptions for journalistic processing of personal data as required under Article 85 of the GDPR. As exemplified by the GDPR-based lawsuit brought by a wealthy business group against *Forbes Hungary*, this leaves reporters subject to general data-controller obligations and vulnerable to data-protection complaints designed to suppress reporting on matters of public interest.<sup>24</sup> As of 2023, one-third of independent outlets in Hungary had already faced GDPR-based proceedings.<sup>25</sup>

## **v. Unlawful Surveillance**

While Hungary has a relatively strong legal framework for the protection of journalistic sources, its lack of effective oversight over government surveillance in effect undermines that protection and violates international legal standards. In 2021, investigative journalism center *Direkt36* reported that journalists, lawyers, opposition figures, and even senior government officials had been targeted with Pegasus spyware.<sup>26</sup> It also reported that the Hungarian government had purchased the spyware through an intermediary company linked to the Interior Ministry.<sup>27</sup> The European Parliament’s Committee of Inquiry on Pegasus subsequently concluded that the Hungarian authorities had indeed deployed Pegasus against journalists, lawyers, and opposition figures. It also found that Hungary’s lack of independent oversight and judicial control over surveillance measures breached EU values and fundamental rights.<sup>28</sup> The absence of judicial safeguards and effective remedies remains incompatible with European Court of Human Rights standards set in *Szabó and Vissy v. Hungary*, *Hüttl v. Hungary*, and *Csikós v. Hungary*—judgments which the Hungarian government has failed to implement.<sup>29</sup>

## vi. Cyberattacks

Independent media have repeatedly been targeted by distributed denial of service (DDoS) attacks. These attacks overwhelm servers with artificial traffic and render websites inaccessible during major news events, such as during Hungary's first national opposition primary election in October 2021.<sup>30</sup> Around the same time, several independent media sites—such as *Mérce*, *24.hu*, and *444.hu*—were also forced offline due to similar attacks.<sup>31</sup> Between April and August 2023, over 40 Hungarian independent media outlets suffered a series of sustained DDoS attacks.<sup>32</sup> While it has not been fully determined who is responsible for the attacks, it is particularly concerning that they have typically targeted independent media outlets.<sup>33</sup>

Despite this systemic obstruction, some independent media outlets have managed to survive in Hungary. Sustained by civic trust, innovative funding models, as well as a public appetite for reliable information, they continue to perform an important watchdog role while keeping people informed on issues of public interest.<sup>34</sup> To an outside observer, this resilience may be misconstrued as evidence that state interference with media freedom is negligible. In truth, independent outlets persist not because of a favorable environment, but in spite of entrenched legal, economic, and political hurdles. As the government's regressive measures intensify, their existence has become increasingly precarious.

The government's repressive measures breach Hungary's obligations both as a Council of Europe and as an EU member state. Hungary is party to the European Convention on Human Rights, Article 10 of which protects the right to freedom of expression, including media freedom.<sup>35</sup> Under European Court of Human Rights jurisprudence, Hungary's government has an obligation not only to refrain from unduly interfering with media freedom, but also "a positive obligation to put in place an appropriate legislative and administrative framework to guarantee effective pluralism."<sup>36</sup>

Hungary is also bound by EU law, which adds concrete, sector-specific obligations and enforcement pathways with respect to media freedom and pluralism. Article 11 of the Charter of Fundamental Rights guarantees freedom of expression and information and requires freedom and pluralism of the media to be respected.<sup>37</sup> In addition, a growing body of EU secondary law gives concrete expression to Charter-level values through internal market regulation of the media sector. This includes the European Media Freedom Act (EMFA), which establishes common standards on editorial independence, transparency of media ownership, state advertising, and safeguards for public service media; the Audiovisual Media Services Directive (AVMSD), which requires effective independence of national media regulators; and the Anti-SLAPP Directive, which introduces procedural safeguards against manifestly unfounded cross-border civil proceedings targeting public participation.<sup>38</sup> The EU framework is further complemented by the Whistleblower Protection Directive, which seeks to protect individuals who disclose information on breaches of EU law, including to the media.<sup>39</sup> Finally, the General Data Protection Regulation (GDPR), through Article 85, obliges member states to reconcile data protection with freedom of expression and information by providing appropriate journalistic derogations.<sup>40</sup>

The Hungarian government has failed to comply with many of the aforementioned obligations. Although it has taken some nominal steps to transpose some EU media freedom and pluralism protections into domestic law, it has failed to effectively implement or enforce the European Media Freedom Act, the Audiovisual Media Services Directive, the Anti-SLAPP Directive, Article 85 of the GDPR, and the Whistleblower Protection Directive.<sup>41</sup> Instead, it has chosen to challenge several aspects of the European Media Freedom Act before the Court of Justice of the European Union.<sup>42</sup>

European bodies have recorded Hungary's violations of its legal obligations on numerous occasions. In December 2025, the European Commission opened an infringement procedure against Hungary for violations of the European Media Freedom Act and the Audio-Visual Media Services Act.<sup>43</sup> The European Court of Human Rights has issued numerous judgments finding that the Hungarian government has violated press freedom, but those judgments remain largely unenforced.<sup>44</sup> The EU Rule of Law Reports and the Council of Europe have repeatedly identified structural deficiencies in Hungary's media regulation, the opaque allocation of state advertising, and the lack of independence of public service media.<sup>45</sup>

The Hungarian government has, however, continued its sustained assault on media freedom and pluralism as part of its systematic effort to undermine democracy and the rule of law. By obstructing independent media, the government forecloses the public's access to information crucial for holding the authorities accountable and for making informed voting choices during elections. In order to restore media pluralism and freedom, as outlined below, successive governments will have to undertake specific measures to ensure a legal, political, and economic environment that enables journalists and media outlets to work freely, independently, and without political interference.

If the government remains unwilling to engage in reform, the European Union's efforts to ensure media freedom and pluralism and, more generally, the rule of law, will assume crucial significance. Since 2020, the European Commission's annual Rule of Law Reports have monitored member states' rule of law developments including with respect to media pluralism and freedom in addition to the justice system, the anti-corruption framework, and other issues related to checks and balances.<sup>46</sup> Yet the lack of progress documented in these very reports also reveal the limits of the EU's monitoring framework and the need for effective enforcement.<sup>47</sup> Notably, the European Commission's 2025 Rule of Law Report on Hungary records "no progress"

on strengthening the functional independence of the media regulatory authority, "no progress" on increasing fairness and transparency in the distribution of state advertising, and "no progress" on enhancing the independence of public service media.<sup>48</sup> It notes instead that "pressure on journalists and other media professionals has increased, as they continue to encounter numerous and serious challenges to their work."<sup>49</sup> Indeed, Hungary remains the most striking outlier with respect to rule of law compliance in the EU, displaying the highest number of "no progress" assessment ratings with respect to Rule of Law Report recommendations, reflecting deep-rooted resistance to EU-level oversight.<sup>50</sup>

Without clear benchmarks, follow-up, and consequences for non-compliance, the Rule of Law Reports risk having little impact. Effective enforcement mechanisms are crucial not only for restoring media pluralism and freedom in Hungary, but also to guard against the Hungarian government's media power extending, through Fidesz-allied acquisitions of media outlets, to other EU member states.<sup>51</sup> The Commission's recent decision to open an infringement procedure against Hungary for violations of the European Media Freedom Act and the Audio-Visual Media Services Act is a step in the right direction.<sup>52</sup> However, it is unlikely to bear fruit prior to the forthcoming April 2026 parliamentary elections, when access to unbiased information will be of crucial significance. As outlined below, the European Union should take several additional measures in support of media reform. Rebuilding media pluralism in Hungary is vital not only for the nation's democracy, but also for the credibility of the European Union's commitment to its own founding values.

## **Recommendations to Successive Hungarian Governments**

1. Reform the media regulatory framework to ensure media regulators are genuinely independent and transparent, and eliminate the political control of journalists and media outlets.
2. End the arbitrary obstruction of journalists' and media outlets' requests to the government for information.
3. Ensure legal safeguards against lawsuits used to harass journalists and media outlets based on alleged violations of defamation laws and the GDPR.
4. Refrain from imposing arbitrary restrictions on independent media outlets seeking access to government press conferences, public events, parliament, and public institutions.
5. End smear campaigns against journalists, and ensure that public funds or official channels are not used to publicly discredit journalists to delegitimize them and deter them from independent reporting.
6. Comply fully with and implement European Court of Human Rights judgments relating to media freedom and pluralism.
7. Establish effective court-supervised surveillance procedures and post-notification for affected individuals.
8. Effectively investigate all cyberattacks, digital harassment, and threats against journalists promptly and transparently, and ensure accountability of perpetrators.
9. Reform public service media to guarantee its institutional independence and autonomy.
10. End market distortion and political favoritism in state advertising.
11. Ensure full and consistent implementation and enforcement of the European Media Freedom Act (EMFA), the Audiovisual Media Service Directive (AVMSD), the Anti-SLAPP Directive, the Whistleblower Protection Directive, and Article 85 of the General Data Protection Regulation (GDPR).

## **Recommendations to the European Union**

1. Use infringement procedures proactively and consistently to address EU law violations relating to media pluralism and media freedom in Hungary.
2. Establish an inter-directorate coordination mechanism (involving the Directorate-General for Justice and Consumers (DG JUST), the Directorate-General for Communications Networks, Content and Technology (DG CONNECT), and the Directorate-General for Competition (DG COMP)) to holistically monitor and enforce EU law with respect to media freedom and pluralism in Hungary.
3. Increase direct EU funding for independent Hungarian media, investigative journalism, and press-freedom organizations.

# I. Introduction

Independent media, free to report the truth without undue influence from the government or other external actors, is the cornerstone of a democratic society.<sup>53</sup> It performs a crucial public watchdog function, vital for holding the government and other institutions to account, while also informing the public.

This report documents the systematic assault on independent media in Hungary since 2010 and offers recommendations for reform. Through acquisitions of independent media outlets by government allies, laws politicizing regulatory bodies and restricting journalistic freedoms as well as the targeted exclusion, vilification, and harassment of independent journalists, the Orbán government has systematically sought to restrict independent media.

Before 2010, Hungarian media operated without major restrictions, though it was not entirely free of challenges.<sup>54</sup> The media market was diverse, featuring both foreign and domestic investors.<sup>55</sup> While economic pressures existed, the legal environment broadly respected editorial independence.<sup>56</sup> Today, the situation is markedly different. Hungary's media freedom now ranks amongst the lowest of European Union member states.<sup>57</sup>

This decline in media freedom occurred in the context of the Orbán government's systematic assault on the rule of law. Since it took office in 2010, that government has deliberately and comprehensively restructured Hungary's constitutional order. Through a series of constitutional amendments followed by the adoption of a new constitution in 2012, Orbán's Fidesz party curtailed the Constitutional Court's powers and secured a pro-government majority on the court.<sup>58</sup> The ruling party also captured oversight bodies, including the Media Council (mandated to oversee and ensure the implementation of media freedom) and State Audit Office, as well as the

Prosecutor General's office.<sup>59</sup> Parliament's oversight over the executive has been significantly curtailed.<sup>60</sup> During the COVID-19 pandemic and since 2022, the government normalized governing by decree, issuing emergency decrees that remain in effect indefinitely.<sup>61</sup>

The European Union and the Council of Europe have repeatedly raised the alarm about the degradation of the rule of law in Hungary.<sup>62</sup> In 2018, the European Parliament triggered the Article 7 procedure identifying a clear risk of serious breaches of EU values.<sup>63</sup> In 2022, the European Parliament described Hungary as a "hybrid regime of electoral autocracy."<sup>64</sup>

## II. The Evolution of Hungarian Media: Post-2010 Media Capture

Following the collapse of communism in 1989, Hungary's media market has consisted of a mix of state-owned public service media as well as private media outlets.<sup>65</sup> Foreign investors, especially German companies, began entering the market in the early 1990s.<sup>66</sup> The selection of print media quickly expanded.<sup>67</sup> In 1996, the first media law was passed and, following the frequency tenders, national commercial television broadcasting began in 1997, followed by radio broadcasting in 1998.<sup>68</sup> The economy was growing, and advertisers fueled the growth of the media industry.<sup>69</sup> At the same time, foreign investors did not know the language or the cultural context, and the editorial offices were run by journalists who had been socialized under communism.<sup>70</sup> New management techniques appeared, and significant infrastructure developments took place, but no one paid attention to the development of western professional and ethical standards of journalism in Hungary.<sup>71</sup> At the time, this shortcoming was not yet apparent; the Hungarian media market had seemingly emerged from its previous scarcity to become a competitive market, and consumers welcomed this with great enthusiasm. With the spread of the internet, media supply continued to grow, and media consumption habits aligned with global trends.<sup>72</sup>

In the 2000s, Hungarian investors began to play a more prominent role again, but in line with the pattern seen across Central and Eastern Europe, this also brought with it the rise of oligarchs and the emergence of clientelism.<sup>73</sup> The 2008 global financial crisis posed a serious challenge to the media industry around the world. The Hungarian economy was vulnerable, and after being confronted with decreasing revenues from their audiences, media enterprises also had to come to terms with declining advertising revenues.<sup>74</sup> Another global challenge was the rise of digital platforms, especially Google and Facebook. By the early 2010s,

it had become clear that these tech giants posed a serious threat to media business models.<sup>75</sup>

The plurality of the media landscape began to change after 2010, when the Orbán government came to power and enacted new media laws.<sup>76</sup> It established a new regulatory framework featuring far greater state intervention in the media market than before.<sup>77</sup> Because of global and domestic developments, the Hungarian media market became less attractive for international investors. The economic decline impacted foreign investors, and several major enterprises left the country because they no longer saw the high returns they had previously experienced.<sup>78</sup> Among others, Sanoma, ProSiebenSat1, Funke Gruppe, Metropol, Axel Springer and Ringier sold their Hungarian media assets.<sup>79</sup> As Hungarian investors bought those assets, the Hungarian share in the ownership of the media market significantly increased.<sup>80</sup> By the beginning of the 2010s, Lajos Simicska, a close friend of Prime Minister Viktor Orbán, had become the largest media owner in Hungary.<sup>81</sup> Following Simicska's serious conflict with Orbán in 2015<sup>82</sup>, another close friend of Orbán's, Lőrinc Mészáros, became Hungary's largest media owner.<sup>83</sup>

The Orbán government captured large segments of the media sector through consolidation of private outlets under allied ownership, diversion of state advertisement to government-friendly outlets, and control of public media.<sup>84</sup>

The case of market-leader news portal *Origo* in 2014 marked a turning point: after publishing an investigation into ministerial spending, the editor-in-chief was forced to resign, triggering a mass exodus of journalists.<sup>85</sup> At that time, *Origo* was owned by the German telecom giant Deutsche Telekom, but shortly thereafter, *Origo* was sold to a politically connected owner and transformed from a respected news

site into a government mouthpiece.<sup>86</sup> Similarly, the closure of the independent daily *Népszabadság* in 2016 by Mediaworks – followed by its acquisition by an ally of the Prime Minister – highlighted the direct impact of political interests on media pluralism.<sup>87</sup>

The most striking example of media capture occurred in 2018, with the creation of the Central European Press and Media Foundation (KESMA). In a single move, 476 pro-government media outlets were consolidated under one umbrella foundation, with the government exempting the merger from competition and media plurality reviews by invoking a “national strategic interest.”<sup>88</sup> This unprecedented concentration of media ownership effectively deprived Hungarian citizens of diverse information sources.

In parallel, the government has used state advertising as a tool of political favoritism. Pro-government outlets receive substantial public funds, while independent media have been systematically excluded, distorting competition and undermining sustainability.<sup>89</sup> Despite complaints to the European Commission, no investigation into unlawful state aid has yet been launched.<sup>90</sup>

Government-aligned media outlets in Hungary are structurally, financially, or editorially dependent on those in power. They typically display one or more of the following features: personal ties between owners and political elites, as in the cases of Lajos Simicska who controlled major outlets like Hír TV<sup>91</sup>; direct or indirect ownership links, such as Andrew G. Vajna’s acquisition, while he was serving as a government commissioner, of TV2, Rádió 1, and regional dailies<sup>92</sup>; and consistent editorial loyalty, where outlets promote government narratives, minimize government scandals, and function as instruments of political communication rather than independent watchdogs.<sup>93</sup>

Political influence extends across the media ecosystem. Distribution networks, media agencies, and even printing houses have fallen into the hands of government-friendly actors.<sup>94</sup> Independent

weekly *Magyar Hang*, for example, has been forced to print in Slovakia because no printing house in Hungary was willing to sign a contract with the publisher.<sup>95</sup>

Overseen by the Fidesz-controlled Media Council, public service media, rather than providing balanced information, functions as an instrument of government propaganda, with opaque financing and indications of competition-distorting government support that under EU law amounts to “illegal state aid.”<sup>96</sup> In addition, political communication on digital platforms is dominated by government actors. In the first half of 2024 alone, the ruling party and its proxies spent €5.4 million on Meta and Google advertising – almost four times the combined political advertising spending of 15 opposition parties and their proxies on those platforms.<sup>97</sup>

Local media markets are even more vulnerable—advertising revenues are limited, editorial offices face political pressure, and local outlets are often owned or financed by municipal governments aligned with the ruling party.<sup>98</sup> Truly independent local journalism is rare, and most citizens in the countryside are left with highly biased information.<sup>99</sup>

Today, Hungarians derive their news mainly from online media and television, relying to a lesser extent on radio and even less on print media.<sup>100</sup> Fidesz is estimated to control roughly eighty percent of the country’s media, including through the buy-out of outlets by Fidesz allies.<sup>101</sup> Unsurprisingly, Hungarians’ trust in news media and journalism is among the lowest in Europe. According to the Reuters Institute Digital News Report, only 22 percent of Hungarian respondents trust “most news most of the time.”<sup>102</sup>

### III. Independent Media: The Fourth Estate

Although Hungary's media landscape is characterized by a high degree of political control and market distortion, several independent media outlets have managed to operate outside this system. Sustained by innovative ownership structures and funding models, these outlets play an important public watchdog role. Despite facing sustained political, legal, and economic pressure, they remain active and relevant. Their survival stems not from a favorable environment for media freedom, but from their adaptive strategies, distinct organizational characteristics, and community-based support.<sup>103</sup>

Key Hungarian independent media outlets include *RTL*, *24.hu*, *HVG*, *Telex*, *444*, *Partizán*, *Magyar Hang*, *Válasz Online*, *Klubrádió*, *Átlátszó*, *Direkt36*, *Magyar Narancs* in addition to some local online media outlets.<sup>104</sup> Many of these outlets were founded by journalists who left politically captured newsrooms, choosing integrity and independence over political control.<sup>105</sup>

Independent media outlets have performed an important watchdog role while keeping Hungarians informed on issues of public interest. For example, *HVG* reported on allegations that President Pál Schmitt had plagiarized his doctoral thesis, leading to his resignation in 2012.<sup>106</sup> In 2021, *Direkt36* reported that the Hungarian government had used Pegasus spyware to surveil journalists and opposition political figures.<sup>107</sup> In 2024, *444* reported on President Katalin Novák's controversial pardon of an individual implicated in child sexual abuse.<sup>108</sup>

Independent media outlets that have managed to survive have been sustained by civic trust and innovative funding models. A long-standing element of this ecosystem is Hungary's tax-designation mechanism, introduced in the mid-1990s, which allows citizens to direct one percent of their paid personal income tax to non-profit organizations, including newsrooms. This mechanism has provided a modest but stable domestic revenue

source independent of government favor, and has strengthened the direct relationship between citizens and the journalism they value.

In 2024, *Partizán* received the highest amount of such donations of any Hungarian civil organization, while in 2025, *Telex* ranked first nationally.<sup>109</sup> This demonstrates the value of public solidarity for sustaining independent journalism even under an illiberal regime. In addition to funds derived from the tax designation scheme, most independent media rely on donor campaigns, reader subscriptions, and international grants.<sup>110</sup>

While much of the independent media sector consists of small and medium-sized newsrooms with flexible structures and modest resources, several larger independent actors also continue to operate, including domestically owned groups such as *Central Media Group*, foreign-owned broadcasters such as *RTL Hungary*, and multi-source, community-supported outlets such as *Telex*. Despite their different ownership models and capacities, these organizations face the same structural constraints and rely on adaptability to navigate a hostile environment. As international funding narrows and commercial revenues remain limited, they increasingly prioritize direct, trust-based relationships with their audiences and membership or subscription models.

From the outside, this resilience is sometimes misinterpreted as an indication that governmental pressure is negligible. In reality, independent outlets remain active despite significant legal, economic, and political hurdles. Their survival reflects civic solidarity, diversified revenue strategies, and a persistent public demand for reliable information.

# IV. Restrictions on Independent Media

As an EU member state, Hungary is bound by the Union's founding values of democracy, the rule of law, and respect for human rights.<sup>111</sup> It is also bound by the Charter of Fundamental Rights, Article 11 of which protects freedom of expression and information and expressly requires respect for freedom and pluralism of the media.<sup>112</sup> In addition, a growing body of EU secondary law gives concrete expression to Charter-level values through internal market regulation of the media sector. This includes the European Media Freedom Act (EMFA), which establishes common standards on editorial independence, transparency of media ownership, state advertising, and safeguards for public service media; the Audiovisual Media Services Directive (AVMSD), which requires effective independence of national media regulators; and the Anti-SLAPP Directive, which introduces procedural safeguards against manifestly unfounded cross-border civil proceedings targeting public participation.<sup>113</sup> The EU framework is further complemented by the Whistleblower Protection Directive, which seeks to protect individuals who disclose information on breaches of EU law, including to the media.<sup>114</sup> Finally, the General Data Protection Regulation (GDPR), through Article 85, obliges member states to reconcile data protection with freedom of expression and information by providing appropriate journalistic derogations.<sup>115</sup> Although the Hungarian government has taken some nominal steps to transpose some EU media freedom protections into domestic law, it has failed to effectively implement or enforce the European Media Freedom Act, the Audiovisual Media Services Directive, the Anti-SLAPP Directive, Article 85 of the GDPR, and the Whistleblower Protection Directive.<sup>116</sup> Instead, it has chosen to challenge several aspects of the European Media Freedom Act before the Court of Justice of the European Union.<sup>117</sup>

Hungary is also party to the European Convention on Human Rights (ECHR) and the International

Convention on Civil and Political Rights (ICCPR), which protect the right to freedom of expression, including media freedom.<sup>118</sup> The European Court of Human Rights has held that states party to the ECHR have an obligation not only to refrain from unduly interfering with media freedom, but also "a positive obligation to put in place an appropriate legislative and administrative framework to guarantee effective pluralism."<sup>119</sup>

Since 2010, the Hungarian government's systematic attempts to restrict independent media, described below, have breached many of the aforementioned obligations.

## a. Weaponizing Laws Against Independent Media

Since 2010, Hungary's parliament has enacted a series of laws relating to the media, access to information, and defamation. As described below, these laws have established an institutional framework which has been systematically used to restrict independent media.

### i. Media Laws

Following the 2010 elections, the Fidesz-dominated legislature enacted new media laws which fundamentally transformed the media environment.<sup>120</sup> The legislation's most significant innovation was the creation of the Media Council, a supervisory body that is nominally independent but in practice composed entirely of Fidesz nominees and endowed with broad powers over print, online, and broadcast media. From the outset, the Council has operated as a politically dependent institution, consistently endorsing the expansion of pro-government actors in the media market.<sup>121</sup> The same laws also centralized control of the public service media under the Media Support and Asset Management Fund (MTVA). Although the 2010 Media Act states that public service media should operate independently, in reality Hungary's

public service media quickly evolved into a politically controlled one that served the government rather than the public.<sup>122</sup>

International bodies—including the Organization for Security and Cooperation in Europe (OSCE), the Venice Commission, and the UN Special Rapporteur on Freedom of Expression—consistently found Hungary's media laws incompatible with media freedom standards.<sup>123</sup> Yet the government refused to implement meaningful reform. Although the European Commission's criticism pressured Hungary to enact minor amendments to media laws in 2011<sup>124</sup> to harmonize them with EU law, this did not change the laws' disproportionately restrictive nature. In 2013, the Council of Europe's criticisms generated very minor changes in relation to the election of members of the media authority.<sup>125</sup> The last comprehensive criticism of the media laws was made by the Venice Commission in 2015.<sup>126</sup> Although the Commission found crucial provisions in the media laws to be incompatible with freedom of the press, the Hungarian legislature declined to amend those laws.

The Hungarian media landscape has also influenced EU legislative responses. The 2018 amendment to the Audiovisual Media Services Directive<sup>127</sup> introduced rules on the independence of media regulators, but these largely codified formal guarantees that already existed in Hungarian law and did not affect the Media Council's politically dependent operation.<sup>128</sup> Although the European Commission's Rule of Law Reports have repeatedly found the independence and transparency of Hungary's media authority to be at "high risk," no corrective measures followed.<sup>129</sup>

Additionally, in 2024, the European Union adopted the European Media Freedom Act (EMFA), a regulation establishing common standards for safeguarding media pluralism and independence across the internal market.<sup>130</sup> Many of its provisions—relating, for example, to state advertising, ownership transparency, limits on market concentration, and safeguards for public service media and

journalists—reflect long-standing concerns in the Hungarian context.<sup>131</sup> The regulation entered into force in August 2025, but Hungary has taken no steps towards alignment.<sup>132</sup> As EMFA enforcement depends largely on national governments, its impact under current political conditions is expected to be limited, although it may provide an important legal framework for future restoration of media pluralism and freedom.<sup>133</sup>

## ii. Freedom of Information Law

Hungary's Freedom of Information (FOI) framework, originally established by the 1992 FOI Act and later consolidated in the Freedom of Information Act of 2011, has long served as a crucial tool for journalists to investigate the use of public funds and hold authorities accountable.<sup>134</sup> In practice, FOI procedures still function relatively well, and in many cases, authorities cooperate and release information on matters that are not politically sensitive. However, since 2010, restrictions have been introduced in response to attempts by journalists or NGOs to expose corruption scandals or other issues inconvenient for those in power.<sup>135</sup>

The first step towards restriction was the abolition of the independent Data Protection Commissioner in 2012, whose responsibilities were transferred to the newly created National Authority for Data Protection and Freedom of Information (NAIH).<sup>136</sup> The premature removal of the Commissioner was later declared unlawful by the Court of Justice of the European Union.<sup>137</sup>

In 2013, Parliament amended the FOI Act to curb so-called "abusive" requests, allowing authorities to reject applications deemed excessive or overly burdensome.<sup>138</sup> This narrowed the scope of the Act and enabled authorities to block access to large datasets of public relevance.<sup>139</sup> Two years later, in 2015, the Act was again modified, permitting authorities to charge vaguely defined labor costs for processing FOI requests.<sup>140</sup> The law also introduced broad grounds for rejecting information requests, such as when the requested material was

“preparatory” to future decisions, or when copyright or duplication issues could be claimed.<sup>141</sup> These measures rendered the process for requesting information costly, slow and unpredictable, and they were widely condemned by international organizations and by the UN Special Rapporteur on human rights defenders.<sup>142</sup>

During the COVID-19 state of emergency in 2020, the government further curtailed access to information and transparency. A government decree extended FOI response deadlines to 90 days, effectively suspending timely access to information.<sup>143</sup> At the same time, Parliament failed to comply with a Constitutional Court ruling that required amendments to remove legal obstacles in access to data held by entities that received public funds.<sup>144</sup> Later that year, the Fundamental Law itself was amended to narrow the legal definition of “public funds,” further restricting the scope of information subject to disclosure.<sup>145</sup>

In 2022, the European Commission triggered the conditionality mechanism due to rule of law concerns, leading the Council of the EU to suspend part of Hungary’s funding.<sup>146</sup> In response, the government amended the FOI Act between late 2022 and early 2023, introducing faster court procedures and free access to public data, with limited exceptions.<sup>147</sup> Yet, in 2023–24, Parliament adopted new restrictive provisions that added further grounds for rejecting information requests.<sup>148</sup> According to K-Monitor’s research, these changes have once again curtailed access to public information in Hungary.<sup>149</sup> In sum, while access to politically neutral data is generally ensured, information concerning corruption, public funds, or government spending continues to face systematic delays and denials, while binding court judgments ordering the disclosure of politically sensitive data are also often ignored.<sup>150</sup>

### **iii. Criminal Law**

Changes to the Criminal Code since 2012 further narrowed journalistic freedoms. A 2013 amendment criminalized the creation or dissemination of

false audio or video recordings that could harm reputations.<sup>151</sup> Although the amendment was originally justified by a fabricated election-fraud video, its text was broadly phrased, and could be read to apply to journalistic materials.<sup>152</sup>

In 2020, during the pandemic, a new offense penalized the “spreading of disinformation” under a special legal order, carrying prison sentences of one to five years.<sup>153</sup> The vague definition allowed room for arbitrary enforcement against critics of government measures. Although courts were cautious in practice, the law had a chilling effect during a time of heightened public need for accurate information.<sup>154</sup>

The 2023 amendment to Hungary’s Criminal Code introduced a limited safeguard for freedom of expression by decriminalizing defamation and insult when committed in the course of public debate through a media service.<sup>155</sup> While this constitutes a modest improvement, the protection applies exclusively to registered media service providers, leaving individual journalists, bloggers, and other actors in public discourse exposed to criminal liability.

### **iv. Sovereignty Protection Act**

In 2023, Parliament enacted the Sovereignty Protection Act, which established the Office for the Protection of Sovereignty (“SPO”), tasked with investigating foreign influence, disinformation, and funding of organizations engaged in democratic debate.<sup>156</sup> The Office has powers to compel information and issue public reports without judicial remedy, effectively enabling state-driven stigmatization of independent media outlets.<sup>157</sup> In June 2024, the Office launched an investigation into independent media outlet Átlátszó and Transparency International Hungary.<sup>158</sup> In November 2025, the Sovereignty Protection Office announced that it would disclose further information allegedly proving the foreign financing of *Telex*.<sup>159</sup> (In October 2024, the European Commission referred Hungary to the Court of Justice of the European Union (CJEU), on the grounds that the Act violated several provisions of EU law.<sup>160</sup>)

In May 2025, Parliament introduced a draft bill titled “*Transparency in Public Life*” that would allow the Office to blacklist organizations, ban them from receiving foreign funds, and subject their leaders to asset declaration and enhanced financial scrutiny.<sup>161</sup> Such measures risk being applied to media outlets, further narrowing the space for independent reporting.<sup>162</sup> Although that draft bill was ultimately not adopted, the Prime Minister has publicly confirmed the government’s intention to enact the law, thereby maintaining a persistent chilling effect on civil society and independent media.<sup>163</sup>

## **b. Targeted Exclusion of Independent Journalists**

Since 2010, Hungarian authorities have deployed systematic practices to obstruct independent journalists.<sup>164</sup> These practices—ranging from ignoring inquiries to restricting access to public institutions—form part of a broader strategy to impair the day-to-day work of outlets critical of the government while also depriving Hungarians access to information on matters of public interest.<sup>165</sup> Particularly since the National Communications Office was established in 2014, and since it was incorporated into the Prime Minister’s Cabinet Office in 2018, state communications have been increasingly centralized, limiting the press’s access to key information and events.<sup>166</sup>

The targeted exclusion of independent journalists has serious adverse effects on their daily work.<sup>167</sup> Since public authorities routinely ignore or delay responding to their questions, many outlets have to rely instead on formal FOI requests, but the FOI process is so slow that responses often arrive long after a story has lost relevance.<sup>168</sup> Others turn to alternative sources such as experts or fellow reporters, especially for television and radio which need immediate comment.<sup>169</sup> Since the 2018 elections, access to information from leaks and personal contacts significantly diminished, as stricter internal government controls and a climate of fear discouraged potential informants.<sup>170</sup> Journalists face sharp ethical dilemmas—the obligation to

seek comment from all sides clashes with a reality where officials rarely respond to queries, forcing reporters to publish stories without answers. Some newsrooms respond by making the lack of response itself the story, even in ironic formats.<sup>171</sup> While European and domestic bodies have condemned restrictions on independent media, legal remedies for challenging them remain slow and incomplete, leaving structural obstacles in place.<sup>172</sup>

### **i. Ignoring Journalistic Inquiries**

State institutions, local municipalities and state-owned enterprises obstruct independent media by systematically ignoring their inquiries. They often refuse to answer journalists’ questions, provide meaningless replies, or completely fail to acknowledge journalistic inquiries.<sup>173</sup> The problem became more acute after the 2018 elections, when government communications became centralized. The systematic non-response of state institutions has since become a structural feature of the media environment, seriously obstructing the daily work of independent media.

### **ii. Excluding Reporters from Public Events and Press Conferences**

The Hungarian government repeatedly denies independent journalists access to public events and government press conferences, especially when Prime Minister Viktor Orbán or ministers are present. This obstruction is rarely formalized. Instead, journalists receive vague rejections based on claims of “limited capacity,” are told that the event is not open to the public, or simply left off accreditation lists despite registering on time.<sup>174</sup> Video footage from inside these events frequently shows ample space or the presence of government-friendly media, undermining the official justification.<sup>175</sup>

For example, in January 2019, journalists from eight independent media outlets were denied entry to Orbán’s first press conference of the year on grounds of insufficient space, even though video evidence showed otherwise.<sup>176</sup> Similar patterns recurred in January 2020 and again in 2022 and

2024.<sup>177</sup> Again, in February 2025, both *Telex* and *HVG* were excluded from the Prime Minister's annual State of the Nation address, with organizers once more citing "limited capacity."<sup>178</sup> The repetition of such exclusion confirms that it is a structural feature of Hungary's media environment rather than an isolated practice.

Local examples also highlight the systematic nature of exclusion. In 2019, the independent outlet *Pécsi Stop* was repeatedly excluded from municipal events in Pécs, while media outlets loyal to the local government were granted access.<sup>179</sup> The Equal Treatment Authority later ruled that this was discriminatory.<sup>180</sup> In 2020, police physically blocked *Telex* reporters from filming at the Carmelite Monastery, which houses the Prime Minister's office. Even after a court ruled that this practice was unlawful<sup>181</sup>, the government circumvented the decision by redesignating the square as a "*designated contraction zone*," effectively reinstating the restriction.<sup>182</sup> In 2024, the police prevented *Telex* reporters from entering the public press conference of Minister of Foreign Affairs and Trade, Péter Szijjártó, while allowing other journalists to enter. When *Telex* reporters waited outside, the police declared the area "operational," meaning it was designated as part of an active law enforcement action to secure the route of the foreign minister, and instructed the journalists to leave.<sup>183</sup>

### **iii. Restrictions on Parliamentary Reporting**

Press freedom has been further curtailed by restrictions imposed on parliamentary reporting. The most significant case occurred in 2016, when six independent journalists were banned from entering the Parliament for allegedly violating the Speaker's order.<sup>184</sup> The Speaker justified the decision by claiming that the journalists had been filming in areas of the Parliament where recording was prohibited under his order, and that they continued filming despite being instructed to stop. According to the reporters, however, they were filming in the same location as on previous occasions, but on that day

due to Prime Minister Orbán's presence, security rules were applied far more strictly. Journalists were confined to an area from where it was practically impossible to approach members of Parliament for comment.<sup>185</sup>

Following a legal challenge to the ban, in 2020, the European Court of Human Rights ruled that it had violated Article 10 of the European Convention on Human Rights.<sup>186</sup> The Court emphasized that while parliaments may regulate media access to preserve order, restrictions must be lawful, proportionate, and subject to procedural safeguards. The Court also found that the arbitrary denial of access to Parliament created a chilling effect on media freedom. Despite this judgment, restrictions intensified after 2019, with journalists confined to designated "press pens" inside Parliament.<sup>187</sup> These small, cordoned-off areas severely limited spontaneous reporting and direct access to members of Parliament. By controlling physical proximity and mobility, the authorities limited the media's ability to cover legislative debates and political developments in real-time.

### **iv. Denying Access to Public Institutions and Refugee Camps**

Hungarian authorities have also blocked independent journalists from entering state-run facilities such as refugee camps and hospitals. These restrictions, often justified on grounds of privacy, security, or institutional order, prevented independent media coverage of sensitive issues of significant public interest, such as migration and healthcare.

For example, in 2015, journalist András Szurovecz sought to report from the Debrecen Reception Centre, aiming to document the living conditions of people seeking asylum in Hungary. Hungarian authorities denied his request, citing security and privacy concerns. After the Hungarian courts dismissed his legal challenge of the denial, the journalist brought the case before the European Court of Human Rights, complaining that the authorities had prevented him from reporting

firsthand on conditions at the Debrecen Reception Centre during the peak of the refugee crisis in Hungary. The Court ruled that this denial violated his right to freedom of expression, affirming that first-hand observation is an essential element of journalism.<sup>188</sup> The Court further stressed that alternatives, such as relying on NGO reports, could not substitute for direct access.<sup>189</sup> Despite this precedent, Hungarian authorities continued to deny journalists access to facilities central to public-interest reporting.

Limitations on press freedom reached a critical point during the COVID-19 pandemic when the Hungarian government significantly restricted journalistic access to information under the pretext of crisis management.<sup>190</sup> The 2020 Coronavirus Act enabled rule by decree and centralized government communication through filtered press briefings, while independent journalists were barred from hospitals and from speaking to doctors without permission.<sup>191</sup> In March 2021, 28 independent media outlets jointly protested that these restrictions endangered lives by blocking critical reporting.<sup>192</sup> A court ruling in January 2022 in favor of *Telex* found the blanket hospital ban unlawful and ordered case-by-case decisions.<sup>193</sup> However, the government swiftly circumvented the judgment by issuing a decree that re-established its exclusive control of press access.<sup>194</sup>

### **c. Discreditation and Smear Campaigns Against Journalists**

Beyond structural restrictions, independent journalists in Hungary are systematically subjected to smear campaigns, public discreditation, and stigmatization, primarily by government politicians, pro-government media, and government-affiliated actors. These campaigns, which intensified since 2015, served to delegitimize critical reporting, intimidate dissenting voices, and erode public trust in independent journalism.

#### **i. Blacklists and “Foreign Agent” Narratives**

The first wave of smear campaigns appeared in 2015, characterized by escalating allegations that independent journalists were aligned with George Soros.<sup>195</sup> Pro-government media outlets such as *888.hu*<sup>196</sup> and *Figyelő* publicly listed journalists, academics, and NGO employees as “foreign propagandists” and “Soros’s mercenaries.”<sup>197</sup> Although courts later declared *Figyelő* blacklists unlawful, their chilling effect was significant as they stigmatized independent voices and branded them as enemies of the state.<sup>198</sup>

From 2023 onwards, smear narratives increasingly relied on accusations of foreign funding when independent outlets were labeled as “dollar media” or “Soros media,” allegedly acting on behalf of foreign interests.<sup>199</sup> In January 2023, *Átlátszó* and its editor-in-chief faced a campaign branding them as national security threats, accusing them of betraying Hungarian minorities abroad and serving foreign powers.<sup>200</sup> That same year, Prime Minister Orbán claimed on public radio that “leftist media financed from abroad are pro-war,” framing foreign funding as synonymous with disloyalty to the nation.<sup>201</sup>

The smear campaign intensified in May 2024, when pro-government media outlet *Origo* accused the readers of media outlets such as *Telex*, *444*, and *HVG* of celebrating the assassination attempt on Slovak Prime Minister Robert Fico.<sup>202</sup> No evidence supported this claim, yet the publication alleged that “dollar media readers rejoiced” at political violence.<sup>203</sup>

In June 2024, the SPO launched an investigation into *Átlátszó*, demanding access to bank statements, contracts, and ledgers. The inquiry report characterizes *Átlátszó*’s investigative journalism, freedom of information requests, and whistleblowing platform as “an opportunity to mask intelligence activities against the Hungarian state and its institutions, disguised as legitimate data gathering.”<sup>204</sup> It further states that *Átlátszó*

“operates in line with foreign interests and with foreign state funding,” and concludes that Átlátszó’s activities “pose a sovereignty protection problem for Hungary” and cause “considerable” damage.<sup>205</sup> Átlátszó has rejected all of the SPO’s claims. It has sued the SPO for defamation, and has prevailed before the first instance court.<sup>206</sup> In addition, in June 2025, the independent media outlet *Válasz Online* also filed a defamation lawsuit against the SPO on grounds that the SPO’s public statement<sup>207</sup> falsely implied foreign influence over the outlet’s activities and unlawfully harmed its reputation.<sup>208</sup>

In 2025, the run-up to forthcoming parliamentary elections was marked by an unprecedented escalation of smear campaigns. On February 4, the pro-government media *Magyar Nemzet* and Fidesz parliamentary leader Máté Kocsis accused *Direkt36* of serving Ukrainian intelligence through the *Direkt36* investigative documentary examining corruption and public procurement linked to Orbán’s family network.<sup>209</sup> On March 15, during a national holiday commemoration, Orbán expanded on this imagery, likening his critics to “bedbugs that survived the winter,” and accused them of operating a “shadow army” funded by corrupt foreign money.<sup>210</sup> Professional associations of psychologists and psychiatrists condemned the dehumanizing rhetoric, warning of its dangerous psychological and social effects.<sup>211</sup>

## ii. Delegitimizing Independent Media as “Fake News Factories”

Prime Minister Viktor Orbán has reinforced hostile rhetoric directed at independent journalists. At a 2018 public event, when approached by an *Index* journalist, he replied: “You can ask your questions, but I don’t make statements to fake news factories.”<sup>212</sup> By labeling *Index* in this way, Orbán signaled to public officials that critical outlets were unworthy of engagement, effectively legitimizing systematic exclusion.<sup>213</sup> Afterwards, government spokespersons and politicians adopted similar language, portraying independent media as unreliable, politically biased, and a danger to national interests.<sup>214</sup>

In September 2025, the government-affiliated Digital Civic Circles<sup>215</sup> organized a mass event in Budapest, where photos of independent journalists were publicly displayed in the lobby under the label “top fake news producers.”<sup>216</sup> This stigmatizing display illustrated how smear campaigns moved beyond media narratives into physical spaces of political mobilization.

In October 2025, *Telex* and the Ján Kuciak Investigative Centre revealed that entities linked to the Sovereignty Protection Office had funded Facebook advertisement campaigns targeting independent journalists and NGOs with hostile narratives.<sup>217</sup> The investigation identified 193 sponsored ads published between 2024 and 2025, showing how state-backed online propaganda had become an integrated tool of intimidation and disinformation.<sup>218</sup>

## iii. Hate, Harassment, and Defamation of Individual Journalists

By 2020, smear campaigns had escalated to more extreme accusations. A government-aligned talk show linked to *PestiSrákok* falsely implied that a senior *Magyar Hang* journalist was a pedophile. The journalist initiated legal proceedings, and, in September 2022, the Budapest Court of Appeal ruled the allegations unlawful and ordered *PestiSrákok* to pay damages and issue a formal apology.<sup>219</sup> Despite this judgment, *Magyar Hang* and its staff remained frequent targets of orchestrated discreditation.<sup>220</sup> At the same time, independent journalist Szabolcs Panyi, an investigative reporter with *Direkt36*, was a constant target of smear campaigns directed by government officials and pro-government media outlets. These outlets repeatedly questioned his credibility, accusing him of serving “foreign interests” or acting as “an agent of foreign intelligence services,” apparently because of his investigative reporting on corruption and surveillance.<sup>221</sup> In addition to these attacks, Panyi was targeted with Pegasus spyware in 2021.<sup>222</sup> The following year, far-right politician Barna Bartha of *Mi Hazánk* told supporters that “people like [the

*independent journalist] Boróka Parászka should be hanged,”* escalating years of threats she had faced after reporting on Hungarian media funding in Transylvania.<sup>223</sup> The backlash forced Bartha’s resignation, but the episode underscored the normalization of violent rhetoric, particularly against women journalists.<sup>224</sup>

## **d. Strategic Lawsuits Against Public Participation (SLAPPs)**

In Hungary, defamation lawsuits may be filed in parallel under both civil and criminal law. This enables Strategic Lawsuits Against Public Participation (SLAPPs), i.e., abusive lawsuits filed by a private party to silence critical speech, to be brought against journalists and independent media outlets. Before the Criminal Code was amended in 2023<sup>225</sup>, criminal laws, along with civil defamation claims, were frequently used by public officials to silence journalists and civil rights activists.<sup>226</sup> Civil lawsuits based on personality rights, including the right to reputation and honor, remain widely used. Politicians and government-organized NGOs (“GONGOs”)<sup>227</sup> initiate lawsuits against independent media outlets seeking rectification and compensation for alleged violations of their personal rights, including damages.<sup>228</sup>

Litigation brought against independent media outlet *Magyar Hang* was an example of a SLAPP.<sup>229</sup> In 2019, in a series of articles, the portal reported on corruption issues that had emerged in a social care home operating in the countryside.<sup>230</sup> The director and the heads of the regional and national institutions that maintain care homes retaliated by initiating five press rectification procedures against *Magyar Hang*.<sup>231</sup> They also launched criminal defamation procedures and a civil law lawsuit against the outlet.<sup>232</sup> Ultimately, *Magyar Hang* won all civil procedures, and the criminal procedure was closed without charges.<sup>233</sup> In 2024, Prime Minister Viktor Orbán personally launched defamation lawsuits against several independent outlets after they cited an Austrian newspaper interview in which the CEO of Austrian supermarket company Spar criticized the Orbán government.<sup>234</sup>

Several first-instance courts dismissed the claims, while the Supreme Court of Hungary (“Kúria”) ruled against *Pécsi Stop*.<sup>235</sup> In the *24.hu* case, the court also referred questions to the Court of Justice of the European Union on the applicability of the European Media Freedom Act.<sup>236</sup>

Alleged General Data Protection Regulation (GDPR) violations have increasingly become the basis for SLAPPs in Hungary. Since personal information and individual stories constitute the core material of journalism, the GDPR has far-reaching consequences for the work of the press.<sup>237</sup> While the GDPR primarily targets misuse of data by public and private entities, it recognizes the need for special rules for journalistic activities. Article 85 of the GDPR requires Member States to strike a balance between data protection with freedom of expression, allowing for specific derogations in the media sector.<sup>238</sup>

However, the Hungarian government failed to adopt legislation that establishes exemptions for the journalistic processing of personal data.<sup>239</sup> As a result, journalists are treated as standard data controllers, subject to procedural obligations that are incompatible with the realities of investigative journalism, such as notifying data subjects before publication or conducting pre-publication data assessments. This legislative omission created a constitutional loophole: a legal grey area that effectively shifts the burden of balancing these fundamental rights onto courts and administrative bodies. In doing so, the state abdicated its positive obligation to safeguard press freedom, leaving journalists vulnerable to inconsistent interpretations and abusive litigation under data protection law. According to research and interviews with journalists in 2023, one-third of the 34 independent media outlets had already experienced GDPR-based SLAPPs in Hungary.<sup>240</sup> Among these, the GDPR-based lawsuit brought by a wealthy business group against *Forbes Hungary* became emblematic, illustrating how data protection law has been weaponized to silence reporting on influential business figures and matters of public interest.<sup>241</sup>

The European Union has recognized SLAPPs as a growing threat to press freedom. The Anti-SLAPP Directive (2024)<sup>242</sup> obliges Member States to establish safeguards against manifestly unfounded cross-border lawsuits, while the Commission Recommendation (2022)<sup>243</sup> provides guidance on tackling domestic cases. However, the Directive does not address GDPR-based SLAPPs, leaving data-protection claims outside its scope. Hungary has not thus far effectively implemented either the Directive or the Recommendation, and no national mechanisms exist to prevent or remedy abusive litigation against journalists.<sup>244</sup>

## e. Unlawful Surveillance

Hungary has a comparatively strong legal framework for the protection of journalistic sources. The Freedom of the Press Act stipulates that journalists cannot be compelled to reveal their sources unless ordered by a court in the interest of justice or national security.<sup>245</sup> The Criminal Procedure Act recognizes journalists' right to refuse testimony concerning confidential information, subject to judicial review.<sup>246</sup> The Constitutional Court's 2011 decision further entrenched these protections, holding that the confidentiality of sources is a fundamental element of press freedom and democratic oversight.<sup>247</sup> It clarified that compelling disclosure must meet strict tests of necessity and proportionality, and may only be applied as a last resort, when no other evidence is available and there is an overriding public interest.<sup>248</sup> This interpretation closely mirrors the European Court of Human Rights jurisprudence under Article 10 of the European Convention on Human Rights.<sup>249</sup>

In contrast to laws relating to source protection, however, Hungary's regulation of surveillance, which could expose journalistic sources, falls far short of international standards. The legal framework governing Hungary's civilian intelligence services, including the Constitutional Protection Office, is set out in the National Security Act (NSA).<sup>250</sup> The Act authorizes covert surveillance methods such as wiretapping, location tracking, and data collection

for national security purposes.<sup>251</sup> Crucially, it does not require prior judicial authorization. Instead, surveillance is approved by the Minister of Justice through a ministerial procedure, valid for up to 90 days and renewable.<sup>252</sup>

The European Court of Human Rights has repeatedly condemned this framework. In *Szabó and Vissy v. Hungary*<sup>253</sup>, the Court found that the lack of effective oversight violated Article 8 of the European Convention. This was reaffirmed in *Hüttl v. Hungary* (2022)<sup>254</sup>, concerning the likely surveillance of a human rights lawyer, and most recently in *Csikós v. Hungary* (2024)<sup>255</sup>, where the Court held that Articles 8 and 10 were violated when a journalist's phone was intercepted during a criminal investigation. The Court held that the surveillance measures lacked sufficient judicial oversight and failed to include adequate procedural safeguards capable of protecting the confidentiality of journalistic sources.<sup>256</sup> It reaffirmed that such deficiencies created a chilling effect on press freedom and fall short of the Convention's requirements for the protection of journalistic activities in a democratic society.<sup>257</sup>

The inadequacy of Hungary's system for regulating surveillance was further confirmed in 2021, when investigative media outlet *Direkt36* reported that journalists, lawyers, opposition figures, and even senior officials were targeted with Pegasus spyware.<sup>258</sup> Pegasus enables full covert access to a phone's content, including messages, calls, and camera functions, making it a severe violation of press freedom and source protection. The *Direkt36* investigation also uncovered that the Hungarian government had purchased the spyware through an intermediary company linked to the Interior Ministry, confirming direct state involvement in its acquisition and use against journalists and other public figures.<sup>259</sup> Although the National Authority for Data Protection and Freedom of Information (NAIH) launched an investigation into Pegasus use, it concluded by finding no unlawful data processing, leaving key questions unanswered.<sup>260</sup>

Following these revelations, the European Parliament established the Committee of Inquiry on Pegasus (PEGA) to investigate the use of Pegasus and equivalent surveillance spyware.<sup>261</sup> The Committee's report concluded that the Hungarian authorities had indeed deployed Pegasus against journalists, lawyers, and opposition figures.<sup>262</sup> The report found that Hungary's lack of independent oversight and judicial control over surveillance measures breached EU values and fundamental rights.<sup>263</sup>

## **f. Cyberattacks**

Since 2021, Hungarian independent media outlets have increasingly come under cyberattacks. These include, in particular, distributed denial of service (DDoS) operations, which overwhelm servers with artificial traffic and render websites inaccessible at crucial moments.

Hungary's first national opposition primary election in October 2021 was repeatedly disrupted by DDoS attacks, rendering voting platforms inaccessible and forcing organizers to extend deadlines.<sup>264</sup> Around the same time, several independent media sites—such as *Mérce*, *24.hu*, and *444.hu*—were also forced offline due to similar attacks.<sup>265</sup> Between April and August 2023, over 40 Hungarian independent media outlets suffered a series of sustained DDoS attacks.<sup>266</sup> According to investigations by Qurium Media Foundation and the International Press Institute (IPI), these incidents were not random but appeared to be part of a coordinated operation.<sup>267</sup> On September 1, 2023, the International Press Institute's website was rendered inaccessible for three consecutive days following a major DDoS incident.<sup>268</sup> This attack followed the IPI's public reporting on earlier cyberattacks against Hungarian media, suggesting that it was a retaliatory in nature.

While it has not been fully determined who is responsible for the attacks, it is concerning that they have consistently targeted independent watchdog media outlets. In July 2025, Hungarian police arrested a 23-year-old suspect over DDoS attacks on independent media and the IPI. Devices with evidence were seized, but no charges appear to have been filed.<sup>269</sup>

## V. Conclusion

Over the past fifteen years, Hungary has evolved from a pluralistic media system into one of the worst examples of media capture within the European Union.<sup>270</sup> The Hungarian government has engaged in a sustained assault on media freedom and pluralism as part of its systematic effort to undermine democracy and the rule of law. Media regulation, ownership, and state advertising are all concentrated in the hands of the government or its allies, while independent media face the weaponization of laws, targeted exclusion, legal harassment, and smear campaigns. Sustained by public solidarity and professional integrity, some independent media outlets have managed to survive, but their continued existence remains precarious. Repressive measures directed at independent outlets are intensifying, as exemplified by the Sovereignty Protection Office's recent targeting of independent media outlets.

Reversing the decline of media freedom will require not only legal reform, but also political will, independent institutions, and the effective enforcement of European standards. In order to restore media pluralism and freedom, successive governments will have to undertake specific measures to ensure a legal, political, and economic environment that enables journalists and media outlets to work freely, independently, and without political interference.

If the Hungarian government remains unwilling to engage in reform, the European Union's efforts to ensure media freedom and pluralism and, more generally, the rule of law, will assume crucial significance. Effective enforcement mechanisms will be necessary to secure these goals. The European Commission's recent decision to open an infringement procedure against Hungary for violations of the European Media Freedom Act and the Audio-Visual Media Services Act is a step in the right direction.<sup>271</sup> However, it is unlikely to bear fruit prior to the forthcoming April 2026 parliamentary

elections, when access to reliable and unbiased reporting will be critical for keeping voters informed. The European Union can and should take several additional measures in support of media reform. Rebuilding media pluralism in Hungary is vital not only for the nation's democracy, but also for the credibility of the European Union's commitment to its own founding values.

---

## Acknowledgments

This report was written by Bea Bodrogi, Gabor Polyák, Amrit Singh, and Ágnes Urbán.<sup>1</sup> Adriana Garcia, Paulina Milewska, and Eva Simon provided helpful comments.

---

<sup>1</sup>Bea Bodrogi is a media lawyer for three independent Hungarian media outlets (*Telex*, *Direkt36*, and the former *Szabad Európa/RFE-RL Hungary*). These professional engagements did not influence the research, analysis, or conclusions presented in this report.

# Endnotes

- 1 International Press Institute. (2025, November 12). *Media Capture Monitoring Report 2025*. <https://ipi.media/hungary-media-capture-monitoring-report-2025/>; Council of Europe Safety of Journalists Platform. (2025, November 7). *The Partners of the Platform Stand with Independent Journalists in Hungary Amidst Climate of Political Harassment and Demonisation*. <https://fom.coe.int/en/news/detail/107233811/The-Partners-of-the-Platform-Stand-with-Independent-Journalists-in-Hungary-Amidst-Climate-of-Political-Harassment-and-Demonisation>.
- 2 Reporters Without Borders. (2025). *Hungary*. <https://rsf.org/en/country/hungary>.
- 3 According to the Reuters Institute Digital News Report, only 22 percent of Hungarian respondents trust most news most of the time. Newman, N., Arguedas, A. R., Robertson, C. T., Nielsen, R. K., & Fletcher, R. (2025). *Digital News Report 2025* (14th ed). Reuters Institute for the Study of Journalism. p. 25. [https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital\\_News\\_Report\\_2025.pdf](https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital_News_Report_2025.pdf) reutersinstitute.politics.ox.ac.uk#1.
- 4 Reporters Without Borders. (2010). <https://rsf.org/en/index?year=2010>; Reporters Without Borders. (2025). *Hungary*. <https://rsf.org/en/country/hungary>.
- 5 Mertek Media Monitor. (2021). *Media Landscape After a Long Storm. The Hungarian Media Politics since 2010*. <https://mertek.eu/wp-content/uploads/2021/12/MertekFuzetek25.pdf>.
- 6 Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content (Smtv) (setting forth the constitutional and content-related rules for the press and all media services). [https://hunmedialaw.org/dokumentum/152/Smtv\\_110803\\_EN\\_final.pdf](https://hunmedialaw.org/dokumentum/152/Smtv_110803_EN_final.pdf); Act CLXXXV of 2010 on Media Services and on the Mass Media (Mttv) (regulating the institutional framework, licensing, supervision, and operational requirements of media service providers). [https://nmhh.hu/dokumentum/106487/act\\_clxxx\\_on\\_media\\_services\\_and\\_mass\\_media.pdf](https://nmhh.hu/dokumentum/106487/act_clxxx_on_media_services_and_mass_media.pdf). Both Acts are hereinafter referred to by their commonly used Hungarian abbreviations, namely Smtv. and Mttv., respectively.
- 7 Mttv. arts. 23-37, Smtv. arts. 13-20.
- 8 European University Institute, Center for Media Pluralism and Media Freedom. (2024, September). *Monitoring Media Pluralism in the Digital Era, Country Report: Hungary*. p. 16. <https://cadmus.eui.eu/server/api/core/bitstreams/688f467b-287b-5a60-97e5-e92d98ad7e28/content>; International Press Institute. (2022, March 21). *Freedom in Hungary ahead of 2022 election*. p. 7. [https://ipi.media/wp-content/uploads/2022/03/HU\\_PressFreedomMission\\_Report\\_IPI\\_2022.pdf](https://ipi.media/wp-content/uploads/2022/03/HU_PressFreedomMission_Report_IPI_2022.pdf).
- 9 K-Monitor. (2024, January 23). *Hungarian Government Further Weakens Access to Information*. [https://k.blog.hu/2024/01/23/hungarian-government\\_further\\_weakens\\_access\\_to\\_information](https://k.blog.hu/2024/01/23/hungarian-government_further_weakens_access_to_information).
- 10 Act of 2013 on the Protection of Human Dignity and the Prevention of the Falsification of Evidence, amending Act C of 2012 on the Criminal Code (Bill No. T/12865); Act LVII of 2020 on the containment of coronavirus amending Act C of 2012 on the Criminal Code, art. 337.
- 11 Act LXXXVIII of 2023 on the protection of national sovereignty. <https://njt.hu/jogsabaly/en/2023-88-00-00>.
- 12 European Commission. (2024, October 2). *The Commission decides to refer HUNGARY to the Court of Justice of the European Union considering its national law on the Defence of Sovereignty to be in breach of EU law*. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_24\\_4865](https://ec.europa.eu/commission/presscorner/detail/en/ip_24_4865); Article 19. (2024). *Hungary: Act on the Defence of National Sovereignty*. <https://www.article19.org/wp-content/uploads/2024/01/Hungary-Foreign-Agents-law-analysis-ARTICLE-19.pdf>.
- 13 Political Capital and Ján Kuciak Investigative Centre (ICJK-PC). (2025, January). *Sovereignty Protection Office against Átlátszó and Transparency International Hungary*. [https://politicalcapital.hu/pc-admin/source/documents/ICJK-PC-SPOvsAtlatsoTI\\_250131.pdf](https://politicalcapital.hu/pc-admin/source/documents/ICJK-PC-SPOvsAtlatsoTI_250131.pdf); Szuverenitásvédelmi Hivatal. (2025, November 17). *Millions of dollars and euros are flowing to Telex*. <https://szuverenitasvedelmihivatal.hu/hirek/dollar-es-euromilliok-omlenek-a-telexre>.
- 14 Bill T/11923: *Transparency of Public Life* (2024 May 13). <https://www.parlament.hu/irom42/11923/11923.pdf>. English version: [https://helsinki.hu/en/wp-content/uploads/sites/2/2025/05/Bill-T11923\\_Transparency-of-Public-Life.pdf?](https://helsinki.hu/en/wp-content/uploads/sites/2/2025/05/Bill-T11923_Transparency-of-Public-Life.pdf?)
- 15 Euronews. (2025, June 4). The Hungarian Parliament removed the "Transparency in Public Life" bill from its agenda; the vote was postponed until autumn. <https://hueuronews.com/2025/06/04/levettek-napirendrol-csak-osszel-szavaz-a-magyar-parlament-az-atlathatosagi-torvenyrol>; Flachner B. (2025, July 30). Orbán: Mindenkiéppen elfogadjuk az átláthatósági törvényt, ha nem tesszük, mi leszünk a lúzerek [Orbán: We will definitely adopt the transparency law – If we do not, we will be the losers]. *Telex*. <https://telex.hu/belfold/2025/07/30/tusvanyos-orban-viktor-interju-mindenkiéppen-elfogadjuk-ellehetetlenitesitorveny>.
- 16 Hungarian Civil Liberties Union (HCLU). (2020). *The minister and the barkeep are all that's left in the public sphere*: Research on barriers to Hungarian journalism. [https://taszhu/wp-content/uploads/2024/01/press\\_research.pdf](https://taszhu/wp-content/uploads/2024/01/press_research.pdf).
- 17 Mándli v. Hungary, ECtHR (Application no. 63164/16) (2019); Szurovecz v. Hungary, ECtHR (Application no. 15428/16) (2019).
- 18 Bátorfy, A. & Tremmel, M. (2019, February 10). Data visualization: The definitive timeline of anti-Soros conspiracy theories. *Átlátszó*. <https://english.atlatso.hu/2019/02/10/data-visualization-the-definitive-timeline-of-anti-soros-conspiracy-theories/>; Council

of Europe Safety of Journalists Platform. (2017, September 8). *The website 888hu publishes a list of eight journalists described as “propagandists.”* <https://fom.coe.int/en/alerte/detail/28539369>; Átlátszó. (2023, January 13). *Editor-in-chief of Átlátszó to Media1: a smear campaign has been launched against us using the methods of Putin's Russia.* <https://english.atlatszohu/2023/01/13/editor-in-chief-of-atlatszo-to-media1-a-smear-campaign-has-been-launched-against-using-the-methods-of-putins-russia/>; Klág, D. & Horváth Kávai, A. (2025, September 19). Photos and names of Hungarian independent journalists described as “fake news creators” to be displayed at meeting of Fidesz. *Telex.* <https://telex.hu/english/2025/09/19/photos-and-names-of-hungarian-independent-journalists-described-as-fake-news-creators-to-be-displayed-at-meeting-of-fidesz>.

19 Human Rights Watch. (2024, February 13). *“I Can't Do My Job as a Journalist”: The Systematic Undermining of Media Freedom in Hungary.* <https://www.hrw.org/report/2024/02/13/i-cant-do-my-job-journalist/systematic-undermining-media-freedom-hungary>.

20 Media Freedom Rapid Response (2024). *Hungary: Smear Campaign against media intensifies threats to press freedom* <https://www.mfr.eu/hungary-smear-campaign-against-media-intensifies-threats-to-press-freedom/>.

21 Sovereignty Protection Office. (2024, October 28). *The impact of Átlátszó's activities on Hungarian sovereignty* (Inquiry Report No. SZH-0353/20242). <https://szuverenitasvedelmihivatal.hu/dokumentumok/the-impact-of-atlatszos-activities-on-hungarian-sovereignty.pdf>.

22 Bayer, J., Bárd, P., Vosyliute, L., & Luk, N. C. (2021). *Strategic lawsuits against public participation (SLAPP) in the European Union: A comparative study* (Version v3). p. 213. CEPS. <http://dx.doi.org/10.2139/ssrn.4092013>.

23 Hungarian Civil Liberties Union (HCLU). (2023). *Data protection-based (GDPR) SLAPP cases in Hungary – HCLU's report is now available.* <https://hCLU.hu/en/articles/data-protection-based-gdpr-slapp-cases-in-hungary-hclus-report-is-now-available>.

24 Hüttl,T. (2024). *Data Protection Weaponized.* Working Papers, Forum Transregionale Studien. <http://doi.org/10.25360/01-2024-00016>.

25 Hungarian Civil Liberties Union (HCLU). (2023). *Data protection-based (GDPR) SLAPP cases in Hungary – HCLU's report.* <https://hCLU.hu/en/articles/data-protection-based-gdpr-slapp-cases-in-hungary-hclus-report-is-now-available>.

26 Panyi, Sz., & Pethő, A. (2021, July 19). Hungarian journalists and critics of Orbán were targeted with Pegasus, a powerful Israeli cyberweapon. *Direkt36.* <https://www.direkt36.hu/en/leleplezodott-egy-durva-izraeli-kemfegyver-az-orban-kormany-kritikusait-es-magyar-uisagirokat-is-celba-vettek-vele/>.

27 Panyi, S. (2022, September 28). The inside story of how Pegasus spyware was brought to Hungary. *Direkt36.* <https://www.direkt36.hu/en/feltarulnak-a-pegasus-kemszoftverbeszerzesenek-rejtelyei/>.

28 European Parliament. Committee of Inquiry to investigate the use of Pegasus and equivalent surveillance spyware (PEGA). (2023, May 8). *Report on the investigation of the use of Pegasus and equivalent surveillance spyware (2023/2020(INI))*. para. 133. [https://www.europarl.europa.eu/doceo/document/A-9-2023-0189\\_EN.html](https://www.europarl.europa.eu/doceo/document/A-9-2023-0189_EN.html).

29 Szabó and Vissy v. Hungary, ECtHR (Application no. 37138/14) (2016); Hüttl v. Hungary, ECtHR (Application no. 21485/15) (2022); Csikós v. Hungary, ECtHR (Application no. 3723918) (2024).

30 Bolcsó, D. (2021, September 27). Itt a jelentés az előválasztás leállásáról: jól ismert külföldi hálózatok támadása egy rosszul felkészített rendszer ellen [Opposition primary disruption: outage, overload attacks – cyberattack, Fresz Ferenc report on botnet]. *Telex.* <https://telex.hu/belfold/2021/09/27/ellenzeki-elovalasztas-leallas-osszeomlas-terheleses-tamadas-kibertamadas-fresz-ferenc-jelentes-botnet-ahang>.

31 Földi, K. (2021, October 18). Az előválasztás eredményeinek kihirdetése közben több híroldalt is terheléses támadás ért [During the announcement of the primary election results, several news sites were hit by a distributed-denial-of-service attack]. *444.hu.* <https://444.hu/2021/10/18/az-elovalasztas-eredmenyeinek-kihirdetese-kozben-erte-terheleses-tamadas-az-ellenzeki-sajto-tobb-mediumat-is>.

32 International Press Institute. (2023, August 29). *DDoS cyber-attacks pose major new threat to media freedom.* <https://ipi.media/hungary-ddos-cyber-attacks-pose-major-new-threat-to-media-freedom/>.

33 In July 2025, Hungarian police arrested a 23-year-old suspect over DDoS attacks on independent media and the IPI. Devices with evidence were seized, but no charges had yet been filed. Media Freedom Rapid Response. (2025, July 22). *Hungary: Police arrest suspect behind DDoS cyberattacks on IPI and independent media websites.* <https://www.mfr.eu/hungary-police-arrest-suspect-behind-ddos-cyberattacks-on-ipi-and-independent-media-websites/>.

34 International Press Institute (2025). *Hungary's independent media honoured with 2025 IPI-IMS Free Media Pioneer Award.* <http://ipi.media/hungarys-independent-media-honoured-with-2025-ipi-ims-free-media-pioneer-award/>.

35 European Convention on Human Rights, art. 10.

36 Centro Europa 7 S.r.l. and Di Stefano v. Italy, ECtHR [GC] (Application no. 38433/09) (2012), para. 134.

37 Charter of Fundamental Rights of the European Union, art. 11.

38 Regulation 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1083>; Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities. <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>; Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation'). <https://eur-lex.europa.eu/eli/dir/2024/1069/oj/eng>.

39 Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law. <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32019L1937>.

40 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R0679-20160504>.

41 European Commission. (2025, December 11). *Commission calls on Hungary to comply with European Media Freedom Act and Audiovisual Media Services Directive*. <https://digital-strategy.ec.europa.eu/en/news/commission-calls-hungary-comply-european-media-freedom-act-and-audiovisual-media-services-directive>; International Press Institute. (2025). *Hungary: Media Capture Monitoring Report 2025*. <https://ipi.media/hungary-media-capture-monitoring-report-2025/>; European Anti-SLAPP Monitor. (2025). *Hungary: Country profile*. <https://slapp-monitor.eu/country/hungary/>; Hungarian Civil Liberties Union. (2023, November 23). *GDPR Weaponized: Summary of Cases and Strategies where Data Protection is Used to Undermine Freedom of Press in Hungary*. <https://tasz.hu/en/cikkek/gdpr-weaponized-summary-of-cases-and-strategies-where-data-protection-is-used-to-undermine-freedom-of-press-in-hungary/>; K-Monitor and Transparency International-Hungary. (2023, December 21). *Possible infringement of Directive 2019/1937 on the protection of persons who report breaches of Union law by the Hungarian Government*. [https://transparency.hu/wp-content/uploads/2024/01/K-Monitor-Transparency-Int-HU\\_letter\\_to\\_COM\\_on\\_transposition\\_of\\_whistleblower\\_directive\\_21122023.pdf](https://transparency.hu/wp-content/uploads/2024/01/K-Monitor-Transparency-Int-HU_letter_to_COM_on_transposition_of_whistleblower_directive_21122023.pdf).

42 Court of Justice of the European Union. (2024). Case C-486/24 *Hungary v. European Parliament and Council of the European Union* (Action for annulment of Regulation (EU) 2024/1083 – European Media Freedom Act). Official Journal of the European Union, C/2024/5088. <https://eur-lex.europa.eu/eli/C/2024/5088/oj>.

43 European Commission. (2025, December 11). *Commission calls on Hungary to comply with European Media Freedom Act and Audiovisual Media Services Directive*. <https://digital-strategy.ec.europa.eu/en/news/commission-calls-hungary-comply-european-media-freedom-act-and-audiovisual-media-services-directive>.

44 *Mándl v. Hungary*, ECtHR (Application no. 63164/16) (2019); *Szurovecz v. Hungary*, ECtHR (Application no. 15428/16) (2019); *Szabó and Vissy v. Hungary*, ECtHR (Application no. 37138/14) (2016); *Csikós v. Hungary*, ECtHR (Application no. 3723918) (2024); Hungarian Helsinki Committee. (2021). European Implementation Network. *Hungary*. <https://www.einetwork.org/hungary-echr> (noting that the Hungarian government has not implemented 74% of leading European Court of Human Rights judgements from the last ten years).

45 European Commission (2025). *2025 Rule of Law Report Country Chapter on the rule of law situation in Hungary*. [https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a\\_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf](https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf); Council of Europe Human Rights Commissioner, *Memorandum on Freedom of Expression and Media Freedom in Hungary* (CommDH(2021)10). <https://search.coe.int/cm?i=0900001680a1e67e> search.coe.int; Venice Commission (2015, June 22). *Opinion on Media Legislation (ACT CLXXXV on Media Services and on the Mass Media, Act CIV on the Freedom of the Press, and the Legislation on Taxation of Advertisement Revenues of Mass Media) of Hungary*. <https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD%282015%29015-e>.

46 European Commission. (2025, July 8). *2025 Rule of Law Report Country Chapter on the rule of law situation in Hungary*. p. 2, 20-23. [https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a\\_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf](https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf).

47 Polezhaeva, A. (2025, November 5). *Liberties' 2025 gap analysis: The EU rule of law report needs serious reform*. <https://www.liberties.eu/en/stories/rule-of-law-2025-gap-analysis/45560>.

48 European Commission. (2025, July 8). *2025 Rule of Law Report Country Chapter on the rule of law situation in Hungary*. [https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a\\_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf](https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf).

49 Ibid. p. 22.

50 Liberties (2025). *European Commission's Rule of Law Report 2025 Gap Analysis*. <https://www.liberties.eu/f/uv2pr-> p. 4, 11 (noting that Hungary has failed to address six recommendations in the Commission's Rule of Law Reports since 2022, and 88 percent of the reports' recommendations concerning Hungary have shown "no progress").

51 Nikolov, K. (2025, October 17). Orbán's media playbook in the Balkans: A critical test for EU Media Freedom Act. *Eualive.net*. <https://eualive.net/orbans-media-playbook-in-the-balkans-a-critical-test-for-eu-media-freedom-act/>.

52 European Commission. (2025, December 11). *Commission calls on Hungary to comply with European Media Freedom Act and Audiovisual Media Services Directive*. <https://digital-strategy.ec.europa.eu/en/news/commission-calls-hungary-comply-european-media-freedom-act-and-audiovisual-media-services-directive>.

53 The term "media" is broadly interpreted in this report to include not only print and broadcast outlets but also online platforms and blogs in line with Council of Europe Recommendations. Council of Europe. (2011). Recommendation CM/Rec(2011)7 of the Committee of Ministers to member states on a new notion of media. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805cc2c0](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805cc2c0).

54 Gálik, M. (2012). Mídiapolitika Magyarországon a rendszerváltozás után [Media policy in Hungary after the political transition]. *Infokommunikáció és Jog*, 9(3), p. 108-118. <https://szakcikkadatbazis.hu/doc/8346778>.

55 Gálik, M. (2004). A médiatulajdon hatása a média függetlenségére és pluralizmusára Magyarországon. [The impact of media ownership on media independence and pluralism in Hungary] *Médiakutató*, 5(3), p. 69-90. [https://mediakutato.hu/cikk/2004\\_03.osz/05\\_mediatulajdon](https://mediakutato.hu/cikk/2004_03.osz/05_mediatulajdon).

56 Bajomi-Lázár, P. (2017). Tekintélyelvűség és szabadelvűség között: Paradigmaváltások a magyarországi politika és média viszonyában. [Between authoritarianism and liberalism: Paradigm shifts in the relationship between politics and the media in Hungary] *Politikatudományi Szemle*, 26(1), p. 79-104. [https://epa.oszk.hu/02500/02565/00089/pdf/EPA02565\\_poltud\\_szemle\\_2017-1\\_079-104.pdf](https://epa.oszk.hu/02500/02565/00089/pdf/EPA02565_poltud_szemle_2017-1_079-104.pdf)

57 Reporters Without Borders. (2025). *Hungary*. <https://rsf.org/en/country/hungary>.

58 Gadó, G., Kerekes, Z., & Magyar, B. (eds) *From the Rule of Law to the Law of Rule: Dismantling the Rule of Law in Hungary 2010-2024* (2024), p. 4-10, <https://democracyinstitute.ceu.edu/sites/default/files/article/attachment/2024-09/From-the-Rule-of-Law-to-the-Law-of-Rule.pdf>.

59 Ibid. p. 40-43, 28-29.

60 Hungarian Helsinki Committee. (2025). *Deficiencies of the Law-Making Process in Hungary*. p. 2. [https://helsinki.hu/en/wp-content/uploads/sites/2/2025/08/HHC\\_law-making\\_process\\_mapping\\_paper\\_2025.pdf](https://helsinki.hu/en/wp-content/uploads/sites/2/2025/08/HHC_law-making_process_mapping_paper_2025.pdf).

61 Hungarian Helsinki Committee. (2024). *Hungary: Perpetuated States of Exception Undermine Legal Certainty and Human Rights*. p.1-2. [https://helsinki.hu/en/wp-content/uploads/sites/2/2024/04/HHC\\_Hungary\\_states\\_of\\_exception\\_20240402.pdf](https://helsinki.hu/en/wp-content/uploads/sites/2/2024/04/HHC_Hungary_states_of_exception_20240402.pdf).

62 European Commission. (2023). *2023 Rule of Law Report: Country Chapter on Hungary* SWD (2023) 817. [https://commission.europa.eu/publications/2023-rule-law-report-communication-and-country-chapters\\_en](https://commission.europa.eu/publications/2023-rule-law-report-communication-and-country-chapters_en); Council of Europe Commissioner for Human Rights. (2021). *Memorandum on freedom of expression and media freedom in Hungary* (CommDH(2021)10). <https://search.coe.int/cm?i=0900001680a1e67e> search.coe.int.

63 European Parliament. *European Parliament resolution of 12 September 2018 on a proposal calling on the Council to determine, pursuant to Article 7(1) of the Treaty on European Union, the existence of a clear risk of a serious breach by Hungary of the values on which the Union is founded* (2017/2131(INL)). [https://www.europarl.europa.eu/doceo/document/TA-8-2018-0340\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-8-2018-0340_EN.html).

64 European Parliament resolution of 15 September 2022 on the proposal for a Council decision determining, pursuant to Article 7(1) of the Treaty on European Union, the existence of a clear risk of a serious breach by Hungary of the values on which the Union is founded. [http://europarl.europa.eu/doceo/document/TA-9-2022-0324\\_EN.html](http://europarl.europa.eu/doceo/document/TA-9-2022-0324_EN.html).

65 Gálik, M. (2003). *Médiagazdaságtan* [Media Economics]. Aula Kiadó. p. 415-421.

66 Galambos, M. (2008). A német kiadók és a magyarországi újságírás. Volt-e hatásuk az elmúlt 18 évben az újságírói munka minőségére a magyar sajtóban domináns német kiadótulajdonosoknak? [German publishers and journalism in Hungary. Have the dominant German publishing houses in the Hungarian press had an impact on the quality of journalism over the past 18 years?] *Médiakutató* 9(4) p. 23-37. [https://mediakutato.hu/cikk/2008\\_04\\_tel/03\\_nemet\\_kiadok\\_magyarorszagon](https://mediakutato.hu/cikk/2008_04_tel/03_nemet_kiadok_magyarorszagon).

67 Gálik, M., & James, B. (1999). Ownership and Control of the Hungarian Press. *Javnost - The Public*, 6(2), p. 75-92. <https://doi.org/10.1080/13183221.1999.11008712>.

68 Gálik, M. (2003). *Médiagazdaságtan* [Media Economics]. Aula Kiadó. p. 421.

69 Ibid. p. 439.

70 Bajomi-Lázár, P. (2002). A politikai újságírás normái Magyarországon. *Mozgó Világ*, 28(2), p. 53- 68. <https://epa.oszk.hu/01300/01326/00026/febr4.htm>.

71 Galambos, M. (2008). A német kiadók és a magyarországi újságírás. Volt-e hatásuk az elmúlt 18 évben az újságírói munka minőségére a magyar sajtóban domináns német kiadótulajdonosoknak? [German publishers and journalism in Hungary. Have the dominant German publishing houses in the Hungarian press had an impact on the quality of journalism over the past 18 years?] *Médiakutató* 9(4), p. 23-37. [https://mediakutato.hu/cikk/2008\\_04\\_tel/03\\_nemet\\_kiadok\\_magyarorszagon](https://mediakutato.hu/cikk/2008_04_tel/03_nemet_kiadok_magyarorszagon).

72 Tóth, B. (2012). A digitális média feltérképezése: Magyarország. [Mapping digital media: Hungary] *Médiakutató*, 13(3), 9-77. [https://mediakutato.hu/cikk/2012\\_03\\_osz/02\\_digitalis\\_media\\_felterkepezeze](https://mediakutato.hu/cikk/2012_03_osz/02_digitalis_media_felterkepezeze).

73 Örnebring, H. (2012). Clientelism, Elites, and the Media in Central and Eastern Europe. *The International Journal of Press/Politics*, 17(4), p. 497-515. <https://doi.org/10.1177/1940161212454329>.

74 Dragomir, M. (2019). *Media Capture in Europe*. Media Development Investment Fund. <https://www.mdif.org/wp-content/uploads/2023/10/MDIF-Report-Media-Capture-in-Europe.pdf>.

75 Ibid.

76 Smtv. and Mttv.

77 Polyak, G., & Nagy, K. (2015). *Hungarian Media Law*. p. 16. Mertek Media Monitor. [https://mertek.eu/wp-content/uploads/2016/11/mertek\\_booklets\\_vol1\\_hungarian\\_media\\_law\\_2015.01.23.pdf](https://mertek.eu/wp-content/uploads/2016/11/mertek_booklets_vol1_hungarian_media_law_2015.01.23.pdf).

78 Urbán, Á. (2024). The restructuring of the Hungarian media system. *Corvinus Journal of Sociology and Social Policy*, 15(3), p. 25-49. <https://doi.org/10.14267/CJSSP.2024.3.2>.

79 Ibid.

80 Bátorfy, A. (2015). How did the Orbán-Simicska media empire function? *Kreativ*. [https://kreativ.hu/cikk/how\\_did\\_the\\_orban\\_simicska\\_media\\_empire\\_function](https://kreativ.hu/cikk/how_did_the_orban_simicska_media_empire_function).

81 Ibid.

82 The Economist. (2015, February 9). Curse like an oligarch. <https://www.economist.com/europe/2015/02/09/curse-like-an-oligarch>.

83 Mertek Media Monitor. (2021). *Media Landscape After a Long Storm. The Hungarian Media Politics since 2010*. p. 9. <https://mertek.eu/wp-content/uploads/2021/12/MertekFuzetek25.pdf>.

84 Ibid.

85 444.hu. (2014, June 5). *Deutsche Telekom, Hungarian government collude to silence independent media*. <https://444.hu/2014/06/05/deutsche-telekom-hungarian-government-collude-to-silence-independent-media/>.

86 Civitas Institute. (2018). *Black Book. Corruption in Hungary between 2010 and 2018*. p. 53-54. [https://transparency.hu/wp-content/uploads/2018/03/Black-Book\\_EN.pdf](https://transparency.hu/wp-content/uploads/2018/03/Black-Book_EN.pdf).

87 Fabók, B., Pethő, A., & Szabó, A. (2016, November 17). Inside the killing of Népszabadság, Hungary's biggest opposition paper. *Direkt36*. <https://www.direkt36.hu/en/ilyen-volt-a-nepszabadsag-halala-belulrol/>.

88 Mertek Media Monitor. (2021). *Media Landscape After a Long Storm. The Hungarian Media Politics since 2010*. <https://mertek.eu/wp-content/uploads/2021/12/MertekFuzetek25.pdf>.

89 Bátorfy, A. & Urbán, Á. (2020). State advertising as an instrument of transformation of the media market in Hungary. *East European Politics*, 36(1), p. 44-65. <https://doi.org/10.1080/21599165.2019.1662398>.

90 Mertek Media Monitor. (2019). *Complaints to the European Commission*. <https://mertek.eu/en/2020/09/07/ecc-complaints/>; Magyar Hang. (2025, April 28) Statement. <https://hang.hu/info/statement-175565>.

91 Urbán, Á. (2016). *Recent changes in media ownership*. Mertek Media Monitor. [https://mertek.eu/wp-content/uploads/2016/11/mertek\\_media\\_owners2016.pdf](https://mertek.eu/wp-content/uploads/2016/11/mertek_media_owners2016.pdf).

92 International Press Institute. (2024). *The rise of KESMA: How Orbán's allies bought up Hungary's media*. <https://ipi.media/the-rise-of-kesma-how-orbans-allies-bought-up-hungarys-media/>.

93 Szeidl, A., & Szucs, F. (2021). Media Capture through Favor Exchange. *Econometrica*, 89(1), p. 281-310. <https://doi.org/10.3982/ECTA15641>.

94 Urbán, Á. (2024). The Restructuring of the Hungarian Media System. *Corvinus Journal of Sociology and Social Policy*, 15(3), p. 25-49. <https://doi.org/10.14267/CJSSP.2024.3.2>.

95 Ibid.

96 Mertek Media Monitor. (2021). *Media Landscape After a Long Storm. The Hungarian Media Politics since 2010*. pp. 37-47. <https://mertek.eu/wp-content/uploads/2021/12/MertekFuzetek25.pdf>.

97 Political Capital, Mertek Media Monitor, & Lakmusz. (2024). *Fidesz & Co. flooded social media with anti-Western hostile disinformation in Hungary's election campaign, reaching EU spending records*. p. 5-6. [https://politicalcapital.hu/pc-admin/source/documents/Uncovering\\_analyzing\\_debunking\\_and\\_researching\\_sponsored\\_disinfo\\_project\\_summary\\_2024.pdf](https://politicalcapital.hu/pc-admin/source/documents/Uncovering_analyzing_debunking_and_researching_sponsored_disinfo_project_summary_2024.pdf).

98 Polyák, G. & Urbán, Á. (2024). *Local Media for Democracy – Country Focus: Hungary*. European University Institute. Centre for Media Pluralism and Media Freedom. <https://cmpfeuieu/local-media-for-democracy-research-results/local-media-for-democracy-country-focus-hungary/>.

99 Mertek Media Monitor. (2023). *A kormányüzenetek minden betérítének – Országos és külföldi hírek a megyei napilapokban* [Government messages dominate the headlines – National and foreign news in county daily newspapers] [https://mertek.eu/wp-content/uploads/2024/01/Mertek\\_fuzetek\\_35.pdf](https://mertek.eu/wp-content/uploads/2024/01/Mertek_fuzetek_35.pdf).

100 Mertek Media Monitor (2023). *News Islands in a Polarized Media System*. p. 7. [https://mertek.eu/wp-content/uploads/2023/07/Mertek-fuzetek\\_30.pdf](https://mertek.eu/wp-content/uploads/2023/07/Mertek-fuzetek_30.pdf).

101 Reporters Without Borders. (2025). *Hungary*. <https://rsf.org/en/country/hungary>.

102 Newman, N., Arguedas, A. R., Robertson, C. T., Nielsen, R. K., & Fletcher, R. (2025). *Digital News Report 2025* (14th ed). Reuters Institute for the Study of Journalism. p. 25. [https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital\\_News-Report\\_2025.pdf](https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital_News-Report_2025.pdf).

103 Sitanyi, G. & Vajda, E. (2025). *Political Interference and Financial Outcomes: Analysis of Hungarian Media Companies*. <https://globalmediaownership.com/political-interference-and-financial-outcomes-analysis-of-hungarian-media-companies/>.

104 Ibid.

105 Reuters Institute. (2022). *Hungary*. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/hungary>.

106 HVG. (2012, January 11). Súlyos plágiumgyanú Schmitt Pál doktori értekezése körül. [https://hvg.hu/itthon/20120111\\_Schmitt\\_doktori\\_dissertacio\\_plagium](https://hvg.hu/itthon/20120111_Schmitt_doktori_dissertacio_plagium).

107 Panyi, Sz. (2021, April 6). Huge Chinese loan to cover the construction of Fudan University in Budapest. *Direkt36*. <https://www.direkt36.hu/en/kinai-hitelbol-keszul-a-magyar-felsooktatas-oriasberuhazasa-a-kormany-mar-oda-is-igerte-egy-kinai-cegnek/>.

108 Kaufmann, B. (2024, February 2). Novák Katalin kegyelmet adott a bicskei gyerekotthon pedofil exigazgatóját fedező bűntársnak. <https://444.hu/2024/02/02/novak-katalin-kegyelmet-adott-a-bicskei-gyerekotthon-pedofil-exigazgatojat-fedezo-buntarsnak>.

109 24.hu (2024, September 12). A Partizán kapta messze a legtöbb adó 1 százalékos felajánlást [Partizán received by far the most 1% tax donations]. <https://24.hu/fn/gazdasag/2024/09/12/partizan-ado-egy-szazalek-felajnalas-egeszsegugy/>; Telex.hu (2025, September 25). Our readers donated 580 million forints to Telex through their 1 percent tax donations. <https://telex.hu/english/2025/09/17/our-readers-donated-580-million-forints-to-telex-through-their-1-percent-tax-donations>.

110 Sitányi, G. & Vajda, E. (2025). *Political Interference and Financial Outcomes: Analysis of Hungarian Media Companies*. <https://globalmediaownership.com/political-interference-and-financial-outcomes-analysis-of-hungarian-media-companies/>.

111 Treaty on European Union, art. 2.

112 Charter of Fundamental Rights of the European Union, art. 11.

113 Regulation 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1083>; Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities. <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>; Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation'). <https://eur-lex.europa.eu/eli/dir/2024/1069/oj/eng>.

114 Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law. <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32019L1937>.

115 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R0679-20160504>.

116 European Commission. (2025, December 11). *Commission calls on Hungary to comply with European Media Freedom Act and Audiovisual Media Services Directive*. <https://digital-strategy.ec.europa.eu/en/news/commission-calls-hungary-comply-european-media-freedom-act-and-audiovisual-media-services-directive>; International Press Institute. (2025). *Hungary: Media Capture Monitoring Report 2025*. <https://ipi.media/hungary-media-capture-monitoring-report-2025/>; European Anti-SLAPP Monitor. (2025). *Hungary: Country profile*. European Anti-SLAPP Monitor. <https://slapp-monitor.eu/country/hungary/>; Hungarian Civil Liberties Union. (2023, November 23). *GDPR Weaponized: Summary of Cases and Strategies where Data Protection is Used to Undermine Freedom of Press in Hungary*. <https://tasz.hu/en/cikkek/gdpr-weaponized-summary-of-cases-and-strategies-where-data-protection-is-used-to-undermine-freedom-of-press-in-hungary/>; K-Monitor and Transparency International-Hungary. (2023, December 21). *Possible infringement of Directive 2019/1937 on the protection of persons who report breaches of Union law by the Hungarian Government*. [https://transparency.hu/wp-content/uploads/2024/01/K-Monitor\\_Transparency-Int-HU\\_letter\\_to\\_COM\\_on\\_transposition\\_of\\_whistleblower\\_directive\\_21122023.pdf](https://transparency.hu/wp-content/uploads/2024/01/K-Monitor_Transparency-Int-HU_letter_to_COM_on_transposition_of_whistleblower_directive_21122023.pdf).

117 Court of Justice of the European Union. (2024). Case C-486/24: *Hungary v. European Parliament and Council of the European Union* (Action for annulment of Regulation (EU) 2024/1083 – European Media Freedom Act). Official Journal of the European Union, C/2024/5088. <https://eur-lex.europa.eu/eli/C/2024/5088/oj>.

118 European Convention on Human Rights, art. 10; International Covenant on Civil and Political Rights, art. 19.

119 *Centro Europa 7 S.r.l. and Di Stefano v. Italy*, ECtHR [GC], (Application no. 38433/09) (2012), para. 134.

120 Smtv. and Mttv.

121 Mertek Media Monitor. (2015). *Hungarian Media Law*. p. 26-36. [https://mertek.eu/wp-content/uploads/2016/11/mertek\\_booklets\\_vol1\\_hungarian\\_media\\_law\\_2015.01.23.pdf](https://mertek.eu/wp-content/uploads/2016/11/mertek_booklets_vol1_hungarian_media_law_2015.01.23.pdf).

122 Mttv., art. 84. [https://nmhh.hu/dokumentum/106487/act\\_clxxx\\_on\\_media\\_services\\_and\\_mass\\_media.pdf](https://nmhh.hu/dokumentum/106487/act_clxxx_on_media_services_and_mass_media.pdf); Urbán, Á., Polyák, G. & Horváth, K. (2023). How Public Service Media Disinformation Shapes Hungarian Public Discourse. *Media and Communication*, 11(4), 62-72. <https://doi.org/10.17645/mac.v1i4.7148>.

123 OSCE Representative on Freedom of the Media. (2011, February). Legal Analysis of Hungarian Media Legislation. <https://www.osce.org/fom/75990>; Council of Europe. Opinion on Media Legislation (ACT CLXXXV on Media Services and on the Mass Media, Act CIV on the Freedom of the Press, and the Legislation on Taxation of Advertisement Revenues of Mass Media) of Hungary, adopted by the Venice Commission at its 103rd Plenary Session, 19-20 June 2015, <https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD%282015%29015-e>; Office of the High Commissioner for Human Rights. (2011, April 5). Statement delivered by the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, Mr. Frank La Rue, after the conclusion of his visit to Hungary. <https://www.ohchr.org/en/statements-and-speeches/2011/04/statement-delivered-un-special-rapporteur-promotion-and-protection?LangID=E&NewsID=10915>.

124 Politico. (2011, January 17). Kroes: Hungary's media law 'unsatisfactory' <https://www.politico.eu/article/kroes-hungarys-media-law-unsatisfactory/>.

125 Letter of Hungarian NGOs on Media Legislation to Mr. Thorbjørn Jagland, Secretary General, Council of Europe, 04 February 2013, <https://mertek.eu/en/2013/02/04/letter-of-hungarian-ngo-on-media-legislation-to-mr-thorbjorn-jagland-secretary-general-council-of-europe/>.

126 Council of Europe, European Commission for Democracy through Law (Venice Commission). (2015) Opinion on Media Legislation (ACT CLXXXV on Media Services and on the Mass Media, Act CIV on the Freedom of the Press, and the Legislation on Taxation of Advertisement Revenues of Mass Media) of Hungary. <https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD%282015%29015-e>.

127 Official Journal of the European Union (2018). Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities. <https://eur-lex.europa.eu/eli/dir/2018/1808/oj/eng>.

128 Polyák, G. (2024). Monitoring the independence of the media regulatory body as an effective enforcement mechanism for the implementation of the AVMSD. *Journal of Digital Media & Policy*, 15(1), p. 81-99. [https://doi.org/10.1386/jdmp\\_00106\\_1](https://doi.org/10.1386/jdmp_00106_1).

129 European Commission. (2025). 2025 Rule of Law Report. Country Chapter on the rule of law situation in Hungary. [https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a\\_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf](https://commission.europa.eu/document/download/524bd8d4-33ba-4802-891f-d8959831ed5a_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Hungary.pdf).

130 Official Journal of the European Union. (2024). Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act). [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L\\_202401083](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202401083).

131 International Press Institute. (2024). *Media Capture Monitoring Report: Hungary*. <https://ipi.media/publications/media-capture-monitoring-report-hungary/>.

132 International Press Institute. (2025). *Hungary Media Capture Monitoring Report 2025*. <https://ipi.media/hungary-media-capture-monitoring-report-2025/>.

133 Polyák, G. (2023). Too Much for Others, too Little for Us. The Draft European Media Freedom Act from a Hungarian Perspective. *Verfassungsblog*. <https://verfassungsblog.de/too-much-for-others-too-little-for-us/>.

134 Hungary's Freedom of Information framework was first established under Act LXIII of 1992 and later consolidated by Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information. [https://www.naih.hu/files/Privacy\\_Act-CXII-of-2011.EN\\_201310.pdf](https://www.naih.hu/files/Privacy_Act-CXII-of-2011.EN_201310.pdf).

135 Transparency International Hungary. (2025). *A negyedik hatalmi ág megtörése. Kihívások, fogódzók és ellenállási lehetőségek a NER médiarendszerében* [The breaking of the fourth estate: Challenges, anchors, and opportunities for resistance in Hungary's media system] p. 13-17. [https://transparency.hu/wp-content/uploads/2025/10/TiHU\\_negyedik\\_hatalmi\\_ag\\_toolkit\\_web.pdf](https://transparency.hu/wp-content/uploads/2025/10/TiHU_negyedik_hatalmi_ag_toolkit_web.pdf).

136 National Authority for Data Protection and Freedom of Information. (2012). *Annual report 2012*. [http://www.naih.hu/files/Annual-report\\_NAIH\\_2012\\_EN\\_FINAL1.pdf](http://www.naih.hu/files/Annual-report_NAIH_2012_EN_FINAL1.pdf).

137 Court of Justice of the European Union. (2014). Commission v Hungary (Case C-288/12). ECLI:EU:C:2014: 237. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62012CJ0288>.

138 Act XCI of 2013 on the Amendment of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information. (2013). Nemzeti Jogszabálytár [National Legislation Database]. <https://njt.hu/jogszabaly/2013-91-00-00>.

139 Átlátszó.hu. (2013, April 29). *Hungarian Parliament to curtail freedom of information legislation*. <https://atlatszo.hu/kozpenz/2013/04/29/hungarian-parliament-to-curtail-freedom-of-information-legislation/>.

140 Act CXXIX of 2015 on the Amendment of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information. (2015). Nemzeti Jogszabálytár [National Legislation Database]. <https://njthu/jogszabaly/2015-129-00-000>.

141 Ibid.

142 Index on Censorship. (2015, July 2). *Hungary: Government cracks down on freedom of information*. <https://www.indexoncensorship.org/2015/07/hungary-government-cracks-down-on-freedom-of-information/>; United Nations Office of the High Commissioner for Human Rights. (2016, February 16). End of mission statement by the United Nations Special Rapporteur on the situation of human rights defenders on his visit to Hungary (8–16 February 2016). p. 9-10. <https://www.refworld.org/reference/mission/unhrc/2017/en/115622>.

143 Government Decree 179/2020 (V.4) on the rules of access to public information during the state of danger. Magyar Közlöny, 2020/95.

144 Constitutional Court of Hungary. (2020, April 28). Decision 7/2020 (V.13) AB on the establishment of a legislative omission resulting in unconstitutionality in connection with the obligation to provide information under Section 27 (3a) of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information. [https://public.mkab.hu/dev/dontesek.nsf/Of78921c8c1c53d88c12583d8005bc5a4/\\$FILE/7\\_2020%20AB%20hat%C3%A1rozat.pdf](https://public.mkab.hu/dev/dontesek.nsf/Of78921c8c1c53d88c12583d8005bc5a4/$FILE/7_2020%20AB%20hat%C3%A1rozat.pdf).

145 Act X of 2020 amending the Fundamental Law of Hungary (Ninth Amendment). Article 39(3) redefines public funds as "revenue, expenditure and claims of the State."

146 European Commission. (2022, April 27). *Rule of law: Commission launches the conditionality mechanism for the protection of the EU budget*. <https://www.consilium.eurrejectingpa.eu/en/press/press-releases/2022/12/12/rule-of-law-conditionality-mechanism/>.

147 Hungarian Parliament. (2022). *T/1616 – bill submitting amendments to Act CXII of 2011 on the right to informational self-determination and freedom of information* [Parliamentary bill document].

148 Act CI of 2023 on the System of Utilisation of National Data Assets and Certain Services. (2023). Nemzeti Jogszabálytár [National Legislation Database]. <https://njthu/jogszabaly/2023-101-00-000>.

149 K-Monitor. (2024, January 23). *Hungarian Government Further Weakens Access to Information*. [https://k.blog.hu/2024/01/23/hungarian\\_government\\_further\\_weakens\\_access\\_to\\_information](https://k.blog.hu/2024/01/23/hungarian_government_further_weakens_access_to_information)

150 Szabó, D. G. (2018, October 2). Executive and legislative organs of Hungary disobey court rulings. *Verfassungsblog*. <https://verfassungsblog.de/executive-and-legislative-organs-of-hungary-disobey-court-rulings/>

151 Act of 2013 on the protection of human dignity and the prevention of falsification of evidence, amending Act C of 2012 on the Criminal Code] (Bill No. T/12865). <https://www.parlament.hu/irom39/12865/12865-0004.pdf>.

152 IFEX. (2013, November 18). *New law further restricts freedom of speech and freedom of the press in Hungary*. <https://ifex.org/new-law-further-restricts-freedom-of-speech-and-freedom-of-the-press-in-hungary/>.

153 Act LVII of 2020 on the containment of coronavirus (amending Act C of 2012 on the Criminal Code, Section 337 – Scaremongering). Official Gazette of Hungary, 2020/94.

154 ECPMF & Hungarian Helsinki Committee. (2020, May 18). *Hungary's two pandemics: COVID-19 and attacks on media freedom*. European Centre for Press and Media Freedom. <https://wwwecpmf.eu/hungarys-two-pandemics-covid-19-and-attacks-on-media-freedom/>.

155 Act XXX of 2023 amending Act C of 2012 on the Criminal Code. <https://njthu/jogszabaly/2023-30-K0-00>

156 Act LXXXVIII of 2023 on the protection of national sovereignty [English translation]. <https://njthu/jogszabaly/en/2023-88-00-00>.

157 Hungarian Helsinki Committee. (2024). Q&A: *Sovereignty Protection Act* [Act LXXXVIII of 2023 – questions & answers]. [https://helsinki.hu/en/wp-content/uploads/sites/2/2024/02/QandA\\_Sovereignty\\_Protection\\_Act\\_QandA\\_2024.pdf](https://helsinki.hu/en/wp-content/uploads/sites/2/2024/02/QandA_Sovereignty_Protection_Act_QandA_2024.pdf).

158 Transparency International Hungary & Political Capital (ICJK-PC). (2025, January). *Sovereignty Protection Office against Átlátszó and Transparency International Hungary* [Report]. [https://politicalcapital.hu/pc-admin/source/documents/ICJK-PC-SPOVsAtlatszoTI\\_250131.pdf](https://politicalcapital.hu/pc-admin/source/documents/ICJK-PC-SPOVsAtlatszoTI_250131.pdf).

159 Szuverenitásvédelmi Hivatal. (2025, November 17). *Dollár- és eurómilliók ömlenek a Telexre* [Millions of dollars and euros are flowing to Telex]. <https://szuverenitasvedelmihivatal.hu/hirek/dollar-es-euromilliolek-omlenek-a-telexre>.

160 European Commission. (2024, October 3). *The Commission refers Hungary to the Court of Justice considering its national law on the Defence of Sovereignty to be in breach of EU law* (IP/24/4865). [https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip\\_24\\_4865/IP\\_24\\_4865\\_EN.pdf](https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_24_4865/IP_24_4865_EN.pdf).

161 Hungarian Parliament. (2025, May 13). Bill T/11923: Transparency of Public Life [PDF]. <https://www.parlament.hu/irom42/11923/11923.pdf>, English version (unofficial): [https://helsinki.hu/en/wp-content/uploads/sites/2/2025/05/Bill-T11923\\_Transparency-of-Public-Life.pdf](https://helsinki.hu/en/wp-content/uploads/sites/2/2025/05/Bill-T11923_Transparency-of-Public-Life.pdf)?

162 Uitz, R. (2025, May 21). A Threat to the Core: Why the New Hungarian Transparency Bill is an Attack on the Foundations of the European Union. *Verfassungsblog*. <https://verfassungsblog.de/hungary-transparency-law-foreign-funding/>.

163 Euronews. (2025, June 4). *Levették napirendről, csak ősszel szavaz a magyar parlament az átláthatósági törvényről* [The Hungarian Parliament removed the “Transparency in Public Life” bill from its agenda; the vote was postponed until autumn]. <https://hu.euronews.com/2025/06/04/levettek-napirendrol-csak-osszel-szavaz-a-magyar-parlament-az-atlathatosagi-torvenyrol>. Flachner B. (2025, July 30). Orbán: mindenkiéppen elfogadjuk az átláthatósági törvényt, ha nem tessük, mi leszünk a lúzerek [Orbán: We will definitely adopt the transparency law – If we do not, we will be the losers]. *Telex*. <https://telex.hu/belfold/2025/07/30/tusvanyos-orban-viktor-interju mindenkeppen-elfogadjuk-ellehetetlenitesi-torveny>.

164 Hungarian Civil Liberties Union (HCLU). (2020). *The minister and the barkeep are all that's left in the public sphere: Research on barriers to Hungarian journalism*. [https://tasz.hu/wp-content/uploads/2024/01/press\\_research.pdf](https://tasz.hu/wp-content/uploads/2024/01/press_research.pdf).

165 Ibid.

166 Government Decree 162/2020 (IV. 30) on the legal status of the National Communications Office and government communication procurement. <https://net.jogtar.hu/jogszabaly?docid=a2000162.kor>.

167 Hungarian Civil Liberties Union (HCLU). (2024). *The minister and the barkeep are all that's left in the public sphere: Research on barriers to Hungarian journalism*. [https://tasz.hu/wp-content/uploads/2024/01/press\\_research.pdf](https://tasz.hu/wp-content/uploads/2024/01/press_research.pdf).

168 Ibid. p. 21.

169 Ibid. p. 22.

170 Ibid. p. 23.

171 Ibid. p. 23.

172 Ibid. p. 24-25.

173 Transparency International Hungary. (2025). *A negyedik hatalmi ág megtörése. Kihívások, fogódzók és ellenállási lehetőségek a NER médiarendszerében* [The breaking of the fourth estate: Challenges, anchors, and opportunities for resistance in Hungary's media system]. [https://transparency.hu/wp-content/uploads/2025/10/TiHU\\_negyedik\\_hatalmi\\_ag\\_toolkit\\_web.pdf](https://transparency.hu/wp-content/uploads/2025/10/TiHU_negyedik_hatalmi_ag_toolkit_web.pdf).

174 Telex.hu (2024, May 24). *'Nem sajtónyilvános' hivatkozási alappal zárják ki az újságírókat politikusok rendezvényeiről – ami ellentétes a józan ésszel és a magyar törvényekkel* [“Not open to the press”: Journalists barred from politicians’ events in violation of common sense and Hungarian law]. <https://telex.hu/belfold/2024/05/24/nem-sajtonyilvanos-hivatkozási-alappal-zarjak-ki-az-ujsgirokat-politikusok-rendezvenyeirol ami-ellentetes-a-jozan-esszel-es-a-magyar-torvenyekkel>.

175 Ibid.

176 24.hu. (2019, January 10). Orbán Viktor kormányinfón: Nem válaszolt a Klubrádiónak, a Magyar Hangnak, az Azonnalinak és a Mércének [At a government press conference, Viktor Orbán refused to answer questions from Klubrádió, Magyar Hang, Azonnali, and Mérce]. <https://24.hu/belfold/2019/01/10/orban-viktor-kormanyinfo-sajtotajekoztato-klubradio-magyar-hang-azonnali-merce/>.

177 Horn, G. (2020, January 9). A Miniszterelnök fél az újságíróktól – nem engedték be az Átlátszót a sajtótájékoztatójára [The Prime Minister is afraid of journalists – Átlátszó was barred from his press conference]. *Átlátszó*. <https://atlatszo.hu/kozugy/2020/01/09/a-miniszterelnok-fel-az-ujsgiroktol-nem-engedtek-be-az-atlatszot-a-sajtotajekoztatojara/>; Bodacz, P. (2022, November 30). A Magyar Hang mellett több másik stáböt sem engedtek be a kormányinfóra [Besides Magyar Hang, several other crews were also not allowed into the government-info session]. *Magyar Hang*. <https://hang.hu/belfold/a-magyar-hang-mellett-tobb-masik-stabot-sem-engedtek-be-a-kormanyinfora-149068>; Hungarian Civil Liberties Union. (2021, February 2). *Make the registering procedure for Orbán's press conferences public*. <https://hCLU.hu/en/articles/make-the-registering-procedure-for-orbans-press-conferences-public>; Gulyás, B. (2022, December 21). Nem engedték be a Media1-et és több más médiumot Orbán Viktor kormányinfójára [Media1 and several other outlets were not allowed entry to Viktor Orbán's government press conference]. *Media1*. <https://media1.hu/2022/12/21/nem-engedtek-be-a-media1-et-es-tobb-mas-mediumot-orban-viktor-kormanyinfojara/>; Presinszky, J., Mizsur, A. & Horváth Kávai, A. (2024, February 15). *Telex* and several foreign news outlets refused entry to Orbán's annual state of the nation speech. *Telex*. <https://telex.hu/english/2024/02/15/telex-and-several-foreign-news-outlets-refused-entry-to-orbans-annual-state-of-the-nation-speech>.

178 HVG. (2025, február 20). A HVG mellett a Telex és a 24.hu sem vehet részt Orbán Viktor évrétekéjén [HVG, Telex, and 24.hu are not allowed to participate in Viktor Orbán's State of the Nation speech]. [https://hvg.hu/itthon/20250220\\_orban-evertekelo-hvg-24hu-telex-nem-vehet-reszt](https://hvg.hu/itthon/20250220_orban-evertekelo-hvg-24hu-telex-nem-vehet-reszt).

179 Pécsi STOP. (2019, November 27). *Egyenlő Bánásmód Hatóság: szívatta lapunkat a pécsi önkormányzat* [Equal Treatment Authority: the Pécs municipality “messed with” our paper]. <https://pecsistophu/regio/egyenl-banasmod-hatosag-szivatta-lapunkat-a-pecsi-onkormanyzat/502411>.

180 Hungarian Civil Liberties Union (HCLU). (2019, May). *Pécsi Stop case summary: Equal Treatment Authority ruling on media discrimination*. <https://tasz.hu/cikkek/ujabb-tasz-siker-a-propaganda-ellen-az-onkormanyzat-nem-dontheti-el-hogy-kit-tekint-sajtonak/>.

181 Hungarian Helsinki Committee. (2021, March 31). *Unlawful fencing off Hungarian Prime Minister's Office from Telex journalists*. <https://helsinki.hu/en/unlawful-fencing-off-hungarian-prime-ministers-office-from-telex-journalists/>.

182 Fábián, T. (2022, January 18). *Karmelita lezárási építkezés miatt zárták le a környéket* [Closure around the Carmelite Monastery:

Area closed due to construction works]. *Telex*. <https://telex.hu/belfold/2022/01/18/karmelita-lezaras-epitkezes>.

183 Transparency International Hungary. (2025). *A negyedik hatalmi ág megtörése. Kihívások, fogódzók és ellenállási lehetőségek a NER médiarendszerében* [The breaking of the fourth estate: Challenges, anchors, and opportunities for resistance in Hungary's media system]. p. 12. [https://transparency.hu/wp-content/uploads/2025/10/TiHU\\_nagyedik\\_hatalmi\\_ag\\_toolkit\\_web.pdf](https://transparency.hu/wp-content/uploads/2025/10/TiHU_nagyedik_hatalmi_ag_toolkit_web.pdf).

184 Dezső, A. (2016, April 26). Kitiltották az Index újságíróit a Parlamentből [Index journalists banned from the Parliament]. *Index* [https://index.hu/belfold/2016/04/26/kitiltottak\\_az\\_index\\_ujsagiroit\\_a\\_parlamentbol/](https://index.hu/belfold/2016/04/26/kitiltottak_az_index_ujsagiroit_a_parlamentbol/).

185 Liberties. (2020, May 26). *Victory for press freedom in Hungary*. <http://www.liberties.eu/en/stories/mandli-judgment-press-freedom-parliament-hungary/18655>.

186 *Mándli and Others v. Hungary*, ECtHR (Application no. 63164/16) (2020).

187 Dull, Sz. & Kovács, Z. (2019, October 25). Hungarian parliament severely restricts journalists, cordons them off. *Index* [https://index.hu/english/2019/10/25/hungary\\_parliament\\_press\\_restrictions\\_journalists\\_cordoned\\_off/](https://index.hu/english/2019/10/25/hungary_parliament_press_restrictions_journalists_cordoned_off/).

188 *Szurovecz v. Hungary*, ECtHR (Application no. 15428/16) (2019).

189 Ibid. paras 72-74.

190 Hungarian Civil Liberties Union. (2020, April 27). *Research on the obstruction of the work of journalists during the coronavirus pandemic in Hungary*. <https://hclu.hu/en/articles/research-on-the-obstruction-of-the-work-of-journalists-during-the-coronavirus-pandemic-in-hungary/>.

191 Ibid.

192 *Telex*. (2021, March 31). *Szabad tájékoztatás életeket menthet – Nyílt levelet írtak szerkesztőiségek a kormánynak* [Free access to information can save lives – Editorial offices sent an open letter to the government]. <https://telex.hu/kozlemeny/2021/03/31/nyilt-level-szerkesztosegek-szabad-tajekoztatas-eleteket-menthet-covid>.

193 *Telex*. (2022, February 2). *Telex-győzelem: A bíróság kimondta, hogy az Emmi jogtalanul utasította ki a kórházakból a sajtót* [Telex victory: The court ruled that the Ministry of Human Resources unlawfully expelled the press from hospitals]. <https://telex.hu/belfold/2022/02/02/telex-gyozelem-birosag-emmi-jogtalanul-utasitotta-ki-a-korhazakbol-a-sajtot>.

194 Government of Hungary. (2022, February 4). 33/2022. (II. 4). Korm. rendelet az egészségügyi intézmények működési rendjének egyes veszélyhelyzeti szabályairól [Government Decree 33/2022 (II. 4) on certain emergency rules concerning the operation of health care institutions]. Magyar Közlöny. 2022. évi 20. szám. <https://magyarkozlonyhu/dokumentumok/f0281353112aeb9c4fe2fb75dc23748791c8cc0/megtekintes>.

195 Bátorfy, A. & Tremmel, M. (2019, February 10). Data visualization: The definitive timeline of anti-Soros conspiracy theories. *Atlatzso*. <https://telex.hu/kozlemeny/2021/03/31/nyilt-level-szerkesztosegek-szabad-tajekoztatas-eleteket-menthet-covid>.

196 Council of Europe Platform to Promote the Protection of Journalism and Safety of Journalists. (2017, September 8). *The website 888.hu publishes a list of eight journalists described as "propagandists"* <https://fom.coe.int/en/alerte/detail/28539369>.

197 Lengyel, T. (2022, September 28). Bíróság: jogsértő és félelemkeltő volt a Figyelő feketelistája, mindenki jár a bocsánatkérés és a sérelemdíj [Court: the Figyelő blacklist was unlawful and fear-mongering; everyone is entitled to an apology and damages]. *HVG*. [https://hvg.hu/itthon/20220928\\_Jogsertes\\_birosag\\_itelet\\_Figyelo\\_Sorosugynokozos\\_listazas\\_serelemdij](https://hvg.hu/itthon/20220928_Jogsertes_birosag_itelet_Figyelo_Sorosugynokozos_listazas_serelemdij).

198 Ibid.

199 Human Rights Watch. (2024, February 13). *"I Can't Do My Job as a Journalist": Systematic Undermining of Media Freedom in Hungary*. <https://www.hrw.org/report/2024/02/13/i-cant-do-my-job-journalist/systematic-undermining-media-freedom-hungary/>. Mapping Media Freedom. (2024, April 26). *Hungary: Fidesz MEP Tamás Deutsch discredits Partizán on social media*. <https://www.mapmf.org/alert/31469>.

200 Átlátszó. (2023, January 13). *Editor-in-chief of Átlátszó to Media1: a smear campaign has been launched against us using the methods of Putin's Russia*. <https://english.atlatszohu/2023/01/13/editor-in-chief-of-atlatszo-to-media1-a-smear-campaign-has-been-launched-against-using-the-methods-of-putins-russia/>. Mapping Media Freedom. (2023, January 4). *Hungary: Investigative media Átlátszó targeted in pro-government smear campaign*. <https://www.mapmf.org/alert/25544>.

201 Gulyás, B. (2023, March 10). Orbán Viktor háborúpartisággal vádolta meg a „baloldali” sajtót, ami szerinte azért van így, mert külföldről finanszírozzák [Prime Minister Viktor Orbán accused the “leftist” press of being pro-war, claiming they are funded from abroad]. *Media1*. <https://media1.hu/2023/03/10/orban-viktor-haborupartisaggal-vadolta-meg-a-baloldali-sajtot-ami-szerinte-azert-van-igy-mert-kulfoldrol-finanszirozzak>.

202 Origo. (2024, May 15). *A Telex, a 444 és a HVG olvasói örülnek a Robert Fico elleni merényletnek* [Readers of Telex, 444 and HVG rejoice at attempt on Slovak PM Robert Fico]. <https://www.origo.hu/itthon/2024/5/robert-fico-merenylet-telex-hvg-444>.

203 Ibid.

204 Sovereignty Protection Office. (2024, October 28). *The impact of Átlátszó's activities on Hungarian sovereignty* (Inquiry Report No. SZH-0353/20242). <https://szuverenitasvedelmihivatal.hu/dokumentumok/the-impact-of-atlatszos-activities-on-hungarian-sovereignty.pdf>.

205 Ibid.

206 Átlátszó. (2024, November 4). *Bepereljük a Szuverenitásvédelmi Hivatalt* [We are suing the Sovereignty Protection Office]. <https://atlatszo.hu/impakt/2024/11/04/bepereljuk-a-szuverenitasvedelmi-hivatalt/>. Kathus E. (2025, December 4). *Átlátszó wins first-instance lawsuit against the Sovereignty Protection Office*. Átlátszó. <https://english.atlatszo.hu/2025/12/04/atlatszo-wins-first-instance-lawsuit-against-the-sovereignty-protection-office/>.

207 Szuverenitásvédelmi Hivatal. (2025, June 11). *Ukrán propaganda brüsszeli finanszírozással* [Ukrainian propaganda with Brussels funding]. <https://szuverenitasvedelmihivatal.hu/hirek/ukran-propaganda-brusszeli-finanszirozassal>.

208 Válasz Online. (2025, June 18). *Közlemény: A Válasz Online pert indít a Szuverenitásvédelmi Hivatal ellen* [Statement: Válasz Online files a lawsuit against the Sovereignty Protection Office]. <https://www.valaszonline.hu/2025/06/18/kozlemeney-a-valasz-online-pert-indit-a-szuverenitasvedelmi-hivatal-ellen/>.

209 Bakró-Nagy, F. (2025, February 4). A Magyar Nemzet és Kocsis Máté szerint az ukrán titkosszolgálatnak dolgozik a Direkt36 készülő filmje [According to Magyar Nemzet and Máté Kocsis, Direkt36's upcoming film works for the Ukrainian secret service]. *Telex*. <https://telex.hu/belfold/2025/02/04/magyar-nemzet-direkt36-ukrajna-film-tenyfeltaras>.

210 Nagy, N. & Horváth Kávai, A. (2025, March 17). Bugs, cockroaches, vermin – how dehumanising propaganda sets the stage. *Telex*. <https://telex.hu/english/2025/03/17/bugs-cockroaches-vermin-how-dehumanising-propaganda-sets-the-stage>.

211 Nagy, N. (2025, March 18). Pszichológusok, pszichiáterek Orbán Viktor "poloskázós" beszéde ellen petíciót írtak [Psychologists, psychiatrists write petition against Viktor Orbán's "bedbug" speech]. *Telex* <https://telex.hu/belfold/2025/03/18/pszichologusok-pszichiaterek-orban-viktor-poloskazos-beszede-ellen-peticio>.

212 Szilli, T. & Fábián, T. (2018, May 27). Hadseregnyi ember védte Orbánt attól, hogy kérdezhessük [An army of people protected Orbán from us asking questions]. *Index*. [https://index.hu/video/2018/05/27/orban\\_viktor\\_index](https://index.hu/video/2018/05/27/orban_viktor_index).

213 Index.hu, which used to be regarded as one of the largest independent news portals in Hungary, underwent a major restructuring in 2020 following political pressure, the dismissal of its editor-in-chief, and the subsequent mass resignation of staff. Since then, its editorial independence has been widely questioned, and it has not held the same position among independent media outlets as before 2020.

214 Herczeg, M. (2021, September 22). Fake news – Mi az, ami a kormány szerint fake news? [Fake news – What the government considers fake news]. 444. <https://444.hu/2021/09/22/fake-news-mi-az-ami-a-kormany-szerint-fake-news>.

215 The Digital Civic Circles are government-affiliated online activist groups created to mobilize pro-government supporters and disseminate government narratives. <https://dpkor.hu/>.

216 Klág, D. & Horváth Kávai, A. (2025, September 19). Photos and names of Hungarian independent journalists described as "fake news creators" to be displayed at meeting of Fidesz. *Telex*. <https://telex.hu/english/2025/09/19/photos-and-names-of-hungarian-independent-journalists-described-as-fake-news-creators-to-be-displayed-at-meeting-of-fidesz>.

217 Kőváry Sólymos, K. (2025, October 8). Szponzorált gyűlölet: így támadtak magyar újságírókat és civileket Facebook-hirdetésekkel [Sponsored hate: How Hungarian journalists and NGOs were targeted with Facebook ads]. *Telex*. <https://telex.hu/belfold/2025/10/08/szponzoralt-gyulolet-igy-tamadtak-magyar-ujsgirokat-es-civileket-facebook-hirdetesekkel-szuverenitasvedelmi-hivatal-jan-kuciak-oknyomozo-kozpon>.

218 Ibid.

219 Magyar Hang. (2022, October 17). *Jeszenszky Zsolt sajnálkozó levelet írt a Magyar Hangnak* [Zsolt Jeszenszky wrote a letter of regret to Magyar Hang]. <https://hang.hu/belfold/jeszenszky-zsolt-sajnalkozo-levelet-irt-a-magyar-hangnak-145834>.

220 Human Rights Watch. (2024, February 13). *"I Can't Do My Job as a Journalist": The Systematic Undermining of Media Freedom in Hungary*. <https://www.hrw.org/report/2024/02/13/i-cant-do-my-job-journalist/systematic-undermining-media-freedom-hungary>.

221 Panyi, Sz. (2024, May 6). Facebook. Panyi wrote the post in response to a defamatory Facebook post by government spokesperson Zoltán Kovács. <https://www.facebook.com/panyiszabolcs/posts/pfbid029Yow8b9HqCudAdEQF87ntva3qhBNLGTNECCuW5SBK1LnaGvDUM351GXrJdp75NL>.

222 Panyi, Sz. & Pethő, A. (2021, July 18). Hungarian journalists and critics of the government were targeted with Pegasus spyware. *Direkt36*. <https://www.direkt36.hu/en/leleplezodott-egy-durva-izraeli-kemfegyver-az-orban-kormany-kritikusait-es-magyar-ujsgirokat-is-celba-vettek-vele>.

223 Gál, L. & Tőkés, H. (2022, November 2). Közismert erdélyi újságíró felakasztásáról is beszélt a Mi Hazánk Mozgalom politikusa egy székelyföldi szervezetépítő eseményen [Famous Transylvanian journalist threatened with hanging by politician of Our Homeland Movement at Székely-land meeting]. *Transtexel*. <https://transtexel.ro/kozelet/2022/11/02/mi-hazank-erdelyben-bartha-barna>.

224 Council of Europe Safety of Journalists Platform. (2022, November 9). Hungarian politician publicly discusses the hanging of journalist Boróka Parászka. <https://fom.coe.int/en/alerte/detail/107638184>.

225 Hungarian Parliament. (2023). Act XXX of 2023 on the amendment of the Criminal Code concerning defamation. (Adopted May 2023). The amendment exempts statements made in the context of public-interest discourse through the press or other media from criminal liability, unless the expression constitutes a manifest and seriously humiliating

violation of human dignity. Criminal sanctions, however, remain applicable in cases outside this exemption.

226 Bayer, J., Bárd, P., Vosyliute, L., & Luk, N. C. (2021). *Strategic lawsuits against public participation (SLAPP) in the European Union: A comparative study (Version v3)*. p. 213. CEPS. <http://dx.doi.org/10.2139/ssrn.4092013>.

227 Bozzay, B. (2022, February 8). Mindhárom pert megnyerte a Telex a Megafonnal szemben első fokon [Telex won all three lawsuits against Megafon at first instance]. *Telex*. <https://telex.hu/belfold/2022/02/08/mindharom-per-megnyerte-telex-megafon-elszo-fok>.

228 International Press Institute. (2023). *Civil defamation and media freedom in Hungary*. <https://ipimedia/publications/civil-defamation-and-media-freedom-in-hungary/>.

229 Szabó, Zs. L. (2020, March 24). Perekkel akadályozzák lapunk tényfeltáró munkáját [Lawsuits are obstructing our investigative work]. *Magyar Hang*. <https://hang.hu/belfold/perekkel-akadalyoznak-lapunk-tenyfeltaro-munkajat-114707>.

230 Ibid.

231 Ibid.

232 Ibid.

233 Hungarian Civil Liberties Union. (2024). *Kutatás a sajtó működésének állami akadályoztatásáról. A 2020. március és 2021. január közötti időszak tapasztalatai* [Research on state obstruction of press operations: Experiences from March 2020 to January 2021]. p. 38. [https://tasz.hu/wp-content/uploads/2024/01/tasz\\_sajtokutatas\\_3.pdf](https://tasz.hu/wp-content/uploads/2024/01/tasz_sajtokutatas_3.pdf).

234 Szakács, J. (2025, June 17). *Hungary*. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2025/hungary>; Mapping Media Freedom. (2024, May 2). *Hungary: Prime Minister Orbán files lawsuits against several Hungarian media*. <https://www.mapmf.org/alert/31497>.

235 Bita, D. (2024, October 16). A Kúria Orbán javára fordította az ítéletet Spar-ügyben [Curia rules in favor of Orbán in Spar case, overturning lower-court acquittals of Pécsi Stop]. *24.hu*. <https://24.hu/belfold/2024/10/16/kuria-orban-viktor-spar-itelet-pecsi-stop/>.

236 Bita, D. (2024, December 11). Az EU bíróságához fordult a törvényszék a 24.hu és Orbán Viktor között folyó perben [Budapest-Capital Regional Court refers Orbán-24.hu press case to the Court of Justice of the European Union for a preliminary ruling]. *24.hu*. <https://24.hu/belfold/2024/12/11/eu-birosag-orban-viktor-24-spar/>.

237 European Union. (2016). Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation). Official Journal of the European Union, L 119/1.

238 Ibid.

239 Perczel, L. (2025, June). Must cases be unfounded to qualify as abuse of rights?. *EU Law Analysis*. <https://eulawanalysis.blogspot.com/2025/06/must-cases-be-unfounded-to-qualify-as.html>.

240 Hungarian Civil Liberties Union (HCLU). (2023). *Data protection-based (GDPR) SLAPP cases in Hungary – HCLU's report*. <https://hclu.hu/en/articles/data-protection-based-gdpr-slapp-cases-in-hungary-hclus-report-is-now-available>.

241 Ibid.

242 European Union. (2024). Directive (EU) 2024/1069 on protecting persons who engage in public participation from manifestly unfounded or abusive court proceedings (Anti-SLAPP Directive). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024L1069>.

243 European Union. (2022). Commission Recommendation (EU) 2022/758 on protecting journalists and human rights defenders from SLAPPs. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:3A32022H0758>.

244 European Anti-SLAPP Monitor. (2025). *Hungary: Country profile*. <https://slapp-monitor.eu/country/hungary/>.

245 Hungarian National Assembly. (2010). Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content, art. 6. <https://njt.hu/jogszabaly/2010-104-00-00> (Unofficial translation).

246 National Assembly of Hungary. (2017). Act XC of 2017 on Criminal Procedure, art. 177. <https://njt.hu/jogszabaly/2017-123-00-00> (Unofficial translation).

247 Alkotmánybíróság. (2011). 165/2011. (XII. 20.) AB határozat [Hungarian Constitutional Court Decision]. <https://net.jogtar.hu/jogszabaly?docid=A11H0165.AB&txtrerer=A1000185.TV#lbj0ide7c4>.

248 Ibid.

249 *Sanoma Uitgevers B.V. v. the Netherlands*, ECtHR, (Application No. 38224/03) (2010); *Telegraaf Media Nederland Landelijke Media B.V. and Others v. the Netherlands*, ECtHR (Application No. 39315/06) (2012); *Big Brother Watch and Others v. the United Kingdom*, ECtHR [GC] (Application Nos. 58170/13, 62322/14, and 24960/15) (2021).

250 Act CXXV of 1995 on the National Security Services. (1995). *Magyar Közlöny*, No. 102/1995. <https://njt.hu/jogszabaly/1995-125-00-00>.

251 Ibid.

252 Ibid.

253 *Szabó and Vissy v. Hungary*, ECtHR (Application no. 37138/14) (2016).

254 *Hüttl v. Hungary*, ECtHR, (Application no. 21485/15) (2022).

255 *Csikós v. Hungary*, ECtHR, (Application no. 3723918) (2024).

256 Ibid. paras. 66-68.

257 Ibid. para. 68.

258 Panyi, Sz., & Pethő, A. (2021, July 19). Hungarian journalists and critics of Orbán were targeted with Pegasus, a powerful Israeli cyberweapon. *Direkt36*. <https://www.direkt36.hu/en/leleplezodott-egy-durva-israeli-kemfegyver-az-orban-kormany-kritikusait-es-magyar-ujsgirokat-is-celba-vettek-vele/>.

259 Panyi, Sz. (2022, September 28). The inside story of how Pegasus spyware was brought to Hungary. *Direkt36*. <https://www.direkt36.hu/en/feltarulnak-a-pegasus-kemssoftver-beszerzesenek-rejtelyei/>.

260 Nemzeti Adatvédelmi és Információszabadság Hatóság. (2022, January 31). *Summary of the investigation by the NAIH into the use of Pegasus spyware in Hungary*. <https://naih.hu/tajekoztatok-kozlemenek/424-koezlemeney-a-naih-altal-a-pegasus-kemssoftver-magyarorszagon-toerten-alkalmazasaval-osszefuggesben-vegzett-vizsgalatarol-szolo-osszefoglalojaval-kapcsolatban>.

261 European Parliament. (2022, August 16). *Committee of Inquiry on Pegasus and equivalent surveillance spyware (PEGA) – mandate and documents*. <https://www.europarl.europa.eu/committees/hu/product/product-details/20220816CHE10529>.

262 European Parliament. (2023, May 8). *Report on the investigation of the use of Pegasus and equivalent surveillance spyware (2023/2020(INI))*. Committee of Inquiry to investigate the use of Pegasus and equivalent surveillance spyware (PEGA). para. 133. [https://www.europarl.europa.eu/doceo/document/A-9-2023-0189\\_EN.html](https://www.europarl.europa.eu/doceo/document/A-9-2023-0189_EN.html).

263 Ibid.

264 Bolcsó, D. (2021, September 27). *Itt a jelentés az előválasztás leállásáról: jól ismert külföldi hálózatok támadása egy rosszul felkészített rendszer ellen* [Report on the opposition primary suspension: well-known foreign networks attacking a poorly prepared system]. *Telex*. <https://telex.hu/belfold/2021/09/27/ellenzeki-elovalasztas-leallas-osszeomlas-terheleses-tamadas-kibertamadas-fresz-ferenc-jelentes-botnet-ahang>.

265 Fódi, K. (2021, October 18). Az előválasztás eredményeinek kihirdetése közben több híroldalt is terheléses támadás ért [During the announcement of the primary election results, several news sites were hit by a distributed-denial-of-service attack]. 444. <https://444.hu/2021/10/18/az-elovalasztas-eredmenyeinek-kihirdetese-kozben-erte-terheleses-tamadas-az-ellenzeki-sajto-tobb-mediumat-is>.

266 International Press Institute. (2023, August 29). *DDoS cyber-attacks pose major new threat to media freedom*. <https://ipi.media/hungary-ddos-cyber-attacks-pose-major-new-threat-to-media-freedom/> ipi.media.

267 Ibid.

268 International Press Institute. (2024). Cyberattack on IPI: Evidence points to retaliation for press freedom work in Hungary. <https://ipi.media/cyberattack-on-ipi-evidence-points-to-retaliation-for-press-freedom-work-in-hungary/>.

269 Media Freedom Rapid Response. (2025, July 22). *Hungary: Police arrest suspect behind DDoS cyberattacks on IPI and independent media websites*. <https://www.mfrr.eu/hungary-police-arrest-suspect-behind-ddos-cyberattacks-on-ipi-and-independent-media-websites/>.

270 International Press Institute (2025, November 12). *Media Capture Monitoring Report 2025*. <https://ipi.media/hungary-media-capture-monitoring-report-2025/>.

271 European Commission. (2025, December 11). *Commission calls on Hungary to comply with European Media Freedom Act and Audiovisual Media Services Directive*. <https://digital-strategy.ec.europa.eu/en/news/commission-calls-hungary-comply-european-media-freedom-act-and-audiovisual-media-services-directive>.

**Rule of Law Lab**

