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MEDIA SYSTEMS OF UKRAINE AND TURKEY: COMPARATIVE ANALYSIS

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Abstract. The article provides a comparative analysis of the media systems of Ukraine and Turkey. The political context, the interaction of mass media with the authorities in both countries is considered. The author's choice of countries is due to the lack of freedom of speech in Turkey and the risks for freedom of speech in Ukraine in wartime conditions. It was found that the media sphere is more tightly controlled in Turkey than in Ukraine.

The article analyzes the Turkish media sphere, identifies the main stages of strengthening government control over mass media. Since 2016, after the coup attempt, opposition media have been banned. Since 2018, the powers of the President of Turkey have been expanded, which was also reflected in the work of the mass media. Since 2019, control over traditional and digital media has been strengthened, licensing has been introduced. In 2022, a law on the fight against terrorism and disinformation was adopted. It is used when considering the actions of individual journalists. Thus, Turkey is moving towards increased control over freedom of speech.

The Ukrainian media sphere has been studied. Successful steps were noted (the adoption of the new law "On Media", the work of the public broadcasting media group). Problems that need to be solved were also noted (quality and quick investigation of crimes against journalists, reducing the influence of oligarchs). In the conditions of war, Ukraine continues to slowly move towards the protection of people's rights and freedoms, even in conditions of war. The needs of defense are understood by many mass media, and they adapt to new working conditions.

The media systems of Ukraine and Turkey differ in the level of freedom of speech and freedom of the press, as they are in different social and political conditions. The Ukrainian media landscape is more diverse, in Turkey the media sphere is controlled by the authorities. Ukraine is taking a course to protect freedom of speech; the authoritarian regime is strengthening in Turkey.

Keywords: mass media, media, media sphere, media system of Ukraine and Turkey.

Introduction. The media play a key role in society and the state, influencing the formation of public opinion and social norms. The quality and variety of content, in turn, influence the cultural development of society, the level of awareness of citizens about current events and the objective interpretation of past events.

The country's media system includes political, legal, economic, informational, social and ethical components. The relations between the media and the authorities, the media and the population are important. It is also necessary to consider the legislation that defines the limits of media activity, the ownership structure of media companies, the level of development and the needs of the audience.

Analysis of the media system and its components is important for understanding how the media environment functions, how information flows are formed, and what factors affect the quality and availability of information. This allows for a better understanding of the media

landscape and to identify problems that must be solved to improve the information environment in society. A comparative analysis of the media systems of countries with similar or different political and social systems can provide an opportunity to characterize the media landscapes of countries in more detail, to understand similarities or to note differences.

The goal of the work. The purpose of the work is to analyze the media systems of Ukraine and Turkey. There are restrictions on freedom of speech in Turkey. The situation in Ukraine during the war is complex and changeable. The mentioned states are different in the context of political and cultural development, features of social processes.

Methods. During the research, the author used the method of analysis and the comparative method.

Discussion / Results. The media sphere of Turkey is represented mostly by state and progovernment mass media. Traditional mass media are under government control. After 2016, more than 170 newspapers, magazines, TV channels, news agencies and websites, whose activities were assessed as anti-government, were closed or taken under state control. In 2018, the industrial conglomerate «Demirören», founded by a Turkish businessman with a pro-government political position, bought the media group «Doğan», as a result of which the popular Turkish newspaper «Hürriyet», the television network «CNN Türk», the news agency «Dha» could be deleted from the list of independent media. As of 2020, about 71% of Turkey's mass media was owned by four companies close to the government: Turkuvaz/Kalyo, Doğuş, Ciner, and Demirören. These companies, as well as the Albayrak and İhlas groups, own the 40 most popular news agencies in the country (Vertsa, Mat, 2020). They all reflect the government's position and often have identical titles (Snopok, 2023). The only popular media that is independent and owned by the «Walt Disney» company is Turkish TV «Fox». It has the largest reach and is considered a reliable news source (Vertsa, Mat, 2020). But independent and free traditional media in Turkey have a small circulation (Snopok, 2023).

Fairly strict censorship has been introduced in Turkey, especially after the coup attempt in 2016. Experts call the period 2016-2018 the time of institutionalized repression against journalists. Since 2018, with the expansion of the powers of the president of the republic, the media have become even more dependent on the authorities. Membership cards in the professional union of journalists are issued by the Directorate of Communications under the President. It is impossible to work without them. The Directorate works directly with the Supreme Council for Radio and Television and the Agency for Press Advertising. Members of the Council are appointed by the Turkish parliament, which is controlled by the Justice and Development Party, led by President Erdogan. As a result, opposition traditional media are deprived of the opportunity to receive income from advertising, the introduction of fines, searches, suspension of broadcasts, deprivation of licenses and other obstacles to their work. The situation is the same with online media. There is a Social Media Monitoring Unit, as well as an app through which citizens can report posts they believe to be terrorist propaganda. The restriction of freedom also manifests itself in the blocking of web pages and the removal of content. For example, Wikipedia was unavailable in Turkey from 2017 to 2020. Turkey requests social media user data more often than other countries. Facebook and Twitter are reacting in order not to lose a large audience. There is a large staff of «trolls» who try to block opposition content with a large amount of pro-government information. But online media are difficult to control, so they remain an alternative source of more objective information (Vertsa, Mat, 2020; Snopok, 2023).

In 2019, the Supreme Council for Radio and Television introduced new licensing rules. The regulation also affected Netflix, and from 2020, YouTube (Vertsa, Mat, 2020). YouTube was first blocked back in 2007 for offensive content against Turkey's first president, Mustafa Kemal Atatürk. After the coup attempt in 2016, the authorities blocked Twitter, YouTube, and Facebook, and after the explosion in Istanbul in October 2022, they restricted access to Twitter, Instagram, Facebook, YouTube, and some Telegram servers (Snopok, 2023).

In 2019, with the start of the coronavirus pandemic, criticism of the government's actions in the field of health care became another reason for criminalizing the actions of journalists,

imprisoning them for a period of 2 to 4 years. In March 2020, 12 journalists were arrested for inciting «disobedience to the law» and «hate», and doctors were arrested for spreading false news and increasing panic among the population. And the April 2020 campaign to release 90,000 prisoners to reduce the risk of contracting the Covid-19 virus did not affect journalists and other political prisoners (Vertsa, Mat, 2020).

The 2020 law required social networks with more than 1 million daily visits (Facebook, Instagram, Twitter, YouTube, etc.) to open official offices in Turkey. Their main task is to promptly respond to requests from the government and individual users to remove unacceptable, offensive or inappropriate content. Social networks have 48 hours to remove complained content. For ignoring such requests, they face a fine of more than 700,000 dollars. In addition, each social network must store the data of Turkish users exclusively on the territory of Turkey (Snopok, 2023).

In February 2022, the requirement to obtain a broadcasting license was extended to international news sites: they had 72 hours to register with RTÜK. In July 2022, RTÜK blocked the Turkish versions of Deutsche Welle and Voice of America after the channels refused to obtain broadcasting licenses. As of the end of 2021, more than 450,000 websites were blocked in the country, including news pages that publish content about Turkey's military operations, Kurdish news and criticism of the government. The main regulator in the field of social networks became the Office of Information and Communication Technologies. 89% of websites were blocked precisely on his submission. In 2022, access to independent media sites such as PIRHA and Yeni Yaşam was restricted (Snopok, 2023).

In October 2022, the Turkish parliament voted in favor of a law proposed by the Justice and Development Party that would jail journalists and social media users for up to 3 years for intentionally spreading «disinformation» or fake news. Sentences can be doubled if anonymous accounts are used to spread misinformation. The decision on which information is false is made by the judge. Under this law, a Kurdish journalist was arrested for tweeting about the alleged sexual abuse of a 14-year-old girl by police and soldiers (Snopok, 2023).

The Directorate of Information Technology and Communication has blocked access to the Ekşi Sözlük website. It is a Turkish online encyclopedia that also has social networking features. As in Wikipedia, any user can publish an article on the site, add their information to other articles, comment or share. This network, created in 1999, was a popular place for freedom of expression (Snopok, 2023).

Self-censorship is also widespread in the Turkish media environment, so citizens avoid publishing or discussing something on social networks in order not to be punished (Snopok, 2023).

Pro-government media describe the situation in Turkey as hopeful, positive, while foreign news is presented as dramas and disasters (Vertsa, Mat, 2020). In November 2022, the Supreme Council of Radio and Television banned publications on the topic of the terrorist attack in Istanbul for 10 hours (Snopok, 2023).

In 2020, as in previous years, Turkey was called "the world's largest prison for journalists." At that time, more than 80 media workers were under arrest. In 73% of cases, the reason for imprisonment was journalistic reports. Journalists are accused of crimes against the president, cooperation with terrorist groups, threats to national security (Vertsa, Mat, 2020). In January 2022, Sedef Kabash, a journalist who criticized Erdogan on live television, was arrested. In March of the same year, he was sentenced to 2 years and 4 months in prison. As of May 2023, 38 journalists and 1 media worker were imprisoned in the country. Kurdish journalists are persecuted, and they are most often accused of terrorist activities (Snopok, 2023).

The Ukrainian media sphere has experienced many transformations in recent decades. Most of the adopted reforms contributed to strengthening the transparency and freedom of the press, protecting journalists, and ensuring media pluralism. In 2017, a public broadcasting media group was created. In 2022, a new law «On Media» was adopted (entered into force in March 2024), aimed at realizing the right to freedom of expression, the right to receive and freely disseminate information (Zakon Ukrainy, 2022). According to the law, the powers of the National Council on

Television and Radio Broadcasting were expanded, the principles of co-regulation, information requirements and responsibility for violations of legislation were established. In 2023, the Council of Europe positively assessed the content of the Law «On Media».

Mass media in Ukraine are influenced by the state, financial and industrial circles as owners of newspapers, TV channels, and radio stations, as sponsors (Bairachna, 2015: 32). The capabilities of the Internet reduce the level of control and political censorship (Nedbai, 2014: 315).

The national mass media system was formed under the influence of many internal and external factors. Among the internal ones are transformational processes in the political, economic, and social spheres after the collapse of the USSR. Among the external ones are European integration and globalization processes, Russian aggression (Nedbai, 2014: 316). The war created several additional problems for the media. Dozens of publications were closed, primarily in the occupied territories. There is a personnel problem in the editorial offices. Journalists join the ranks of the Armed Forces of Ukraine, die at the front. The economic crisis and blackouts also have a negative impact on the work of the media. Journalism is currently under pressure from the authorities, but is adapting to security requirements (Ukrinform, 2024). Information has become a weapon. Propaganda, psychological campaigns, penetration into databases, promotion of certain ideas, manipulations are aimed at undermining historical and spiritual traditions (Pronoza, 2020: 66).

Modern Ukrainian mass media perform their main function as a mediator between citizens and the government. But the journalists themselves note that this mediation activity is not correct and effective. It deals with politics as a process, not as a substance. That is, the news contains a lot of information about laws and reforms, meetings and discussions, but there is no explanation of the main idea and its value, real meaning and consequences for Ukrainian society. Knowing the process is of no use without understanding the essence. But the essence is more difficult to perceive, its realization requires time and effort. The Ukrainian news consumer is mostly passive, has a negative attitude towards politics and is not ready to spend time and effort on understanding the essence (Hrudka, 2016).

In Ukraine, both the presentation of truthful information and its mythologizing take place. A peculiarity of our country is the saturation of the political space with myths, their collision. This is explained by the Soviet past, the dying of old myths that turned out to be unsustainable and ineffective, as well as cultural heterogeneity. But political myths are necessary, they should contribute to the construction of a rational coordinate system of consciousness, be based on national archetypes related to the history and culture of the Ukrainian people (Maksymchuk, Bondar, 2020: 51-52). So, it is obvious that despite the positive developments, there are many problems in the Ukrainian media sphere that require an urgent solution and a systematic approach. The first is the problem of ineffective investigation of offenses against journalists. Thus, the cases of Heorhiy Gongadze (killed in 2000) and Pavlo Sheremet (killed in 2016) are still not closed, and the culprits have not been brought to justice. Another challenge is the need to reduce the influence of oligarchs on the media sphere (Opryshko, 2023).

Analysis of the media systems of Ukraine and Turkey shows that in these countries there are opposite trends in the development of the media sphere. The difference can also be seen by comparing the countries' places in the ratings of rights and freedoms, freedom of the press.

Thus, according to Freedom House's rating of political rights and freedoms, in 2023 and 2024 Turkey received 1 point out of 4 possible in the category «Does there exist free and independent media?». In general, Turkey is recognized as not a free country (32 points out of 100). This country received the same number of points in another rating from Freedom House internet freedom. Internet access – 14 out of 25, content restrictions – 10 out of 35, violation of user rights – 8 out of 40 (Turkey, Freedom House, 2023; Turkey, Freedom House, 2024). According to this rating, in 2023 Ukraine had 50 points out of 100 (having lost 11 points in a year, it was 61 in 2022), and in the media category it received 2 points out of 4 (Ukraine, Freedom House, 2023; Ukraine, Freedom House, 2022).

According to the press freedom index compiled annually by Reporters Without Borders,

Turkey ranked 165th out of 180 in 2023, and rose to 158th in 2024 (Türkiye, Reporters without borders). In 2023, Ukraine occupied the 79th position, and in 2024 it rose to 61st place (Ukraine, Reporters without borders).

Of course, improvements and reforms in Ukraine are taking place slowly, but a slow movement towards freedom is better than a return to totalitarianism.

So, the media sphere in Ukraine and Turkey has different features and characteristics that are caused by different political, economic and social conditions in these countries. Ukraine chose the path of European integration, the path of democracy development and protection of human rights and freedoms. And now our country opposes Russian aggression and opposes Russian narratives. An important problem in these conditions is the balance between media independence and the needs of state defense. Turkey, on the other hand, is on the path of strengthening authoritarianism. The regime under the leadership of the President and his Justice and Development Party controls various mass media. The authorities control the media, which manifests itself in the form of censorship, arrests of journalists, closure of opposition media. Legislation on the fight against terrorism and disinformation is used to limit freedom of the press. In Ukraine, the media environment is more diverse and has elements of freedom of speech, although it faces problems of censorship and political influence. In Turkey, the media sphere is under strong state control, which limits the freedom of the press. Comparing these media systems helps to understand how political and social conditions affect the media system.

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