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**Bachelor's Thesis**

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# **Comparative Analysis of Media and Free Speech Policy-Formulation in Semi-Democratic Contexts: A Case Study of Georgia and Moldova**

Bachelor's Thesis

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## **Declaration**

1. I hereby declare that I have compiled this thesis using the listed literature and resources only.
2. I hereby declare that my thesis has not been used to gain any other academic title.
3. I fully agree to my work being used for study and scientific purposes.

In Prague on the 31<sup>st</sup> of July Yashar Isgandarov

## Abstract

Media and free speech play crucial roles in shaping democratic societies, particularly in semi-democratic contexts where the balance between state authority and individual liberties is delicate. This thesis explores the policy frameworks governing media and free speech in Georgia and Moldova, specifically focusing on freedom of access to information legislation and free speech legislation. By employing Kingdon's Multiple Streams Framework, the study examines the convergence of problem, policy, and politics streams to understand the dynamics of policy formulation and implementation in these contexts. The research reveals that, despite robust legal frameworks, the practical implementation of access to information and free speech protections is significantly hindered by political interference, bureaucratic barriers, and media ownership concentration. The findings highlight the critical role of various stakeholders, including government bodies, civil society organizations, and international actors, in shaping policy debates and influencing outcomes. The study emphasizes the importance of robust enforcement mechanisms, regulatory measures to address media ownership concentration, and sustained political commitment to ensure that legal protections translate into practical realities. These insights contribute to a deeper understanding of the challenges and opportunities for promoting media freedom and democratic governance in Georgia, Moldova, and similar contexts. There remains much to learn about the evolving political, social, and technological landscapes that continue to shape these issues.

**Keywords:** Media, Free Speech, Georgia, Moldova, Access to Information, Policy Formulation, Media Ownership, Political Interference, Civil Society, Democratic Governance

## Abstrakt

Média a svoboda slova hrají klíčovou roli při formování demokratických společností, zejména v polodemokratických kontextech, kde je rovnováha mezi státní autoritou a individuálními svobodami křehká. Tato práce zkoumá politické rámce upravující média a svobodu slova v Gruzii a Moldavsku, přičemž se konkrétně zaměřuje na legislativu týkající se svobody přístupu k informacím a legislativu o svobodě slova. Pomocí Kingdonova rámce více proudů zkoumá konvergenci problémových, politických a politických proudů, aby pochopila dynamiku tvorby a implementace politik v těchto kontextech. Výzkum odhaluje, že navzdory robustním právním rámcům je praktická implementace ochrany přístupu k informacím a svobody slova významně omezována politickým zasahováním, byrokratickými překážkami a koncentrací vlastnictví médií. Zjištění zdůrazňují zásadní roli různých zainteresovaných stran, včetně vládních orgánů, organizací občanské společnosti a mezinárodních aktérů, při formování politických debat a ovlivňování výsledků. Studie zdůrazňuje význam robustních mechanismů prosazování, regulačních opatření k řešení koncentrace vlastnictví médií a trvalého politického závazku zajistit, aby právní ochrana vedla k praktickým výsledkům. Tyto poznatky přispívají k hlubšímu porozumění výzvám a příležitostem pro podporu svobody médií a demokratické správy v Gruzii, Moldavsku a podobných kontextech. Stále je toho hodně, co se můžeme naučit o měnících se politických, sociálních a technologických krajinách, které tyto otázky nadále formují.

**Klíčová slova:** Média, Svoboda Slova, Gruzie, Moldavsko, Přístup k Informacím, Formulace Politiky, Vlastnictví Médii, Politické Zasahování, Občanská Společnost, Demokratická Správa

## **Název práce**

„Komparativní analýza tvorby politiky médií a svobody slova v polodemokratických kontextech: případová studie Gruzie a Moldavska“

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### 1. Introduction

In contemporary democratic societies, the nexus between media and free speech is instrumental in shaping the foundation of open discourse, information dissemination, and public engagement (Bennett, 2016; Wasserman, Madrid-Morales, & Madrid-Morales, 2018). The dynamic interplay between politics, governance, and the media landscape is particularly evident in semi-democratic contexts. In these environments, the media often plays a dual role as both a government tool and a watchdog. This duality creates a complex relationship where the media can influence public opinion and hold leaders accountable, while also being subject to governmental control and censorship. For instance, in some semi-democratic countries, the media may highlight government achievements and policies to bolster the ruling party's image, while simultaneously exposing corruption and mismanagement to maintain credibility with the public. This pronounced interplay underscores the delicate balance between promoting transparency and supporting government narratives, ultimately shaping the political and governance landscape in nuanced ways, where the delicate balance between state authority and individual liberties necessitates a nuanced understanding of policy formulation. This research undertakes a comparative analysis of media and free speech policy formulation in two semi-democratic nations, Georgia and Moldova. It aims to uncover the distinct strategies each country employs to address these democratic principles. By examining their policy-making processes, the study reveals how Georgia and Moldova differ in their approaches to enhancing media freedom and protecting free speech. This comparison helps

to understand the unique political, social, and historical factors that influence their respective policies.

The significance of free and vibrant media cannot be overstated, especially in societies aspiring towards democratic governance (McChesney, 1999; Curran & Seaton, 2010). Both Georgia and Moldova, as semi-democratic entities, grapple with the complexities of fostering an environment where diverse voices can thrive, and citizens can actively participate in the democratic process. This research aims to delve into the policy frameworks governing media and free speech in the selected nations, with a specific focus on freedom of access to information legislation and legislation on free speech. By honing in on these two critical areas, we aim to compare and contrast how each country addresses the fundamental aspects of democracy within its legal systems. Examining freedom of access to information legislation entails evaluating the extent to which citizens are granted the right to access government-held information. Meanwhile, legislation on free speech involves analyzing the statutes and regulations governing the expression of ideas and opinions (Puppis & Van Den Bulck, 2019). By concentrating on these aspects, we seek to uncover the specific ways in which each nation balances the protection of free speech with societal considerations such as cultural norms, political stability, and public safety. Additionally, we will explore how these countries manage access to information amidst varying degrees of government control and media independence. This analysis will highlight the challenges and compromises inherent in their policy-making processes.

The choice to compare Georgia and Moldova in this analysis is deliberate and based on a careful selection process. This process aimed to minimize extraneous factors that could skew the results, ensuring a more accurate comparison of their media and free speech policies (Martin & Daniel, 2016). By choosing two post-Soviet nations that have traversed the path towards semi-democracy, the research aims to create a controlled environment for examining the nuanced intricacies of media and free speech policy formulation. By focusing on policy formulation, this research seeks to understand not just the existing media and free speech policies in these countries, but also the processes through which these policies are developed and enacted. Exploring policy formulation allows us to uncover the underlying principles, influences, and dynamics shaping media and free speech governance. It provides insights into the decision-making mechanisms, stakeholder involvement, and power dynamics that impact the regulatory landscape. This strategic selection

also mitigates language barriers, facilitating a more comprehensive exploration of the subject matter.

The multifaceted nature of media policies in semi-democratic contexts necessitates a closer examination of the factors influencing their formulation and subsequent impact on the broader societal landscape (Hallin & Mancini, 2004). As highlighted by Tambini (2016), understanding the outcomes of media reform initiatives is crucial for evaluating their effectiveness and implications for freedom of expression. This research aims to explore the intricacies of media policy formulation in Georgia and Moldova, investigating the internal and external factors that influence the creation of these policies. By examining how various conditions interact to shape media policy, we can better understand the resultant policies as the outcomes of these processes. While we will not directly evaluate the policies' impact on society, we will discuss their potential implications for media freedom and the exercise of free speech.

In essence, this research proposal sets forth a comprehensive plan to explore and compare the policy-formulation processes related to media and free speech in Georgia and Moldova during the past two decades. The overarching goal is to unravel the intricacies that lead to divergent media policies in these two semi-democratic nations. By scrutinizing the similarities and differences in how media and free speech policies have been formulated, this research aims to contribute valuable insights to the broader discourse on policy development in semi-democratic societies. Through this analysis, we seek to understand the internal and external factors that influence policy outcomes and their potential implications for freedom of access to information/freedom of speech.

Moreover, the findings of this research hold practical significance for policy-makers, civil society organizations, and media stakeholders, not only in Georgia and Moldova but also for other nations navigating the complexities of semi-democratic governance (Herman & Chomsky, 1988). By shedding light on the best practices and challenges inherent in policy-making related to media and free speech, this study endeavors to provide a nuanced understanding that can inform more effective and responsive policy frameworks in diverse political contexts.

## **2. Literature Review**

### ***2.1 Media Systems and Free Speech***

The role of media in democratic societies has been extensively studied, with scholars such as McChesney (1999) and Curran and Seaton (2010) emphasizing the importance of a free and vibrant media for democratic governance. Media serves as a conduit for information dissemination, public discourse, and government accountability. In semi-democratic contexts like Georgia and Moldova, the dynamics of media freedom and policy formulation become complex, necessitating a deeper understanding.

Daniel C. Hallin and Paolo Mancini's (2004) comparative analysis of media systems identifies three primary models: the Polarized Pluralist Model, the Democratic Corporatist Model, and the Liberal Model. These models help in understanding the functioning of media systems within different political and cultural contexts. The Polarized Pluralist Model, characterized by strong state intervention and politically oriented journalism, is often observed in Southern European countries. The Democratic Corporatist Model, prevalent in Northern Europe, features a significant role for the state alongside a strong tradition of press freedom and journalistic professionalism. The Liberal Model, seen in the United States and the United Kingdom, emphasizes market mechanisms and a minimal role for the state in media affairs. In post-Soviet and semi-democratic nations, media systems often exhibit characteristics of multiple models, influenced by their unique historical and political legacies. Georgia and Moldova, with their transitions from Soviet rule to semi-democratic governance, provide intriguing case studies for examining these dynamics.

Free speech legislation is another critical area of focus. In established democracies, free speech is typically safeguarded by comprehensive constitutional provisions and robust legal frameworks. However, in semi-democratic contexts, these protections can be less consistent and more susceptible to political manipulation. Legal scholars like Puppis and Van Den Bulck (2019) underscore the need for strong legal protections for free speech to ensure a diverse and independent media landscape.

Freedom of access to information (FOI) is also crucial in fostering transparency and accountability, extending beyond the media to all citizens, including civil society organizations (CSOs). Scholars such as Mendel (2008) and Neuman (2016) highlight the importance of FOI laws in empowering citizens and enabling informed participation in democratic processes. In semi-democratic contexts,



the implementation and enforcement of FOI laws can be uneven, influenced by political interests and administrative capacity.

The process of policy formulation itself is complex and influenced by various internal and external factors. Research on policy formulation in the context of media, free speech, and FOI by scholars like Kingdon (1984) and Sabatier (2007) provides insights into how policies are developed, negotiated, and implemented. Understanding these processes is essential for analyzing how media policies are shaped in semi-democratic societies like Georgia and Moldova. The interplay of historical legacies, political pressures, and socio-cultural factors creates unique policy environments in these countries, which this research aims to explore and elucidate.

## ***2.2 Historical Context of Media in Georgia and Moldova***

The media landscapes in Georgia and Moldova have been significantly shaped by their post-Soviet transitions. Both countries have faced substantial challenges in establishing democratic media systems amidst political instability and economic hardships. In Georgia, the Rose Revolution of 2003 marked a pivotal shift towards democratic governance and media reform. The Rose Revolution, a peaceful protest movement, led to the resignation of President Eduard Shevardnadze and brought Mikheil Saakashvili to power, promising democratic reforms and anti-corruption measures (Fairbanks, 2004). Despite these reforms, issues such as political interference and media ownership concentration continue to hinder media freedom. For instance, the government has been accused of exerting influence over media outlets to control the narrative and suppress dissenting voices (Bertelsmann Stiftung, 2022). Media ownership is often concentrated in the hands of a few individuals or entities with close ties to political elites, further complicating the media's role as an independent watchdog.

Similarly, Moldova's media landscape has been influenced by political volatility and the dominance of oligarch-owned media outlets. Following its independence from the Soviet Union in 1991, Moldova has struggled to ensure genuine media independence and foster a competitive media environment. Political volatility in Moldova is characterized by frequent changes in government, political corruption, and instability, which have impacted media freedom (Freedom House, 2022). The influence of oligarchs over major media outlets has led to concerns over media bias and the suppression of dissenting voices. Oligarchs with significant political influence often own key media outlets, using them to promote their political agendas and discredit opponents. This

concentration of media ownership undermines journalistic independence and plurality (Transparency International, 2021). Political attacks on journalists and media organizations, including harassment and legal pressures, further exacerbate the challenges faced by the Moldovan media (Reporters Without Borders, 2022).

### ***2.3 Current Media Policies***

In Georgia, key legislative frameworks governing media include the Law on Freedom of Speech and Expression (2004) and the Law on Broadcasting (2004). These laws aim to protect free speech and ensure the independence of public broadcasters. The Law on Freedom of Speech and Expression provides comprehensive protections for journalists, including the right to criticize the government and access public information. The Law on Broadcasting in Georgia establishes the regulatory framework for television and radio, promoting diversity and preventing monopolies. However, the enforcement of these laws is inconsistent, and political pressures on media remain a significant issue (Transparency International Georgia, 2020). The Georgian National Communications Commission (GNCC), responsible for regulating the broadcast sector, has been criticized for its lack of independence and susceptibility to political influence (OSCE, 2018). Despite legal protections, journalists and media outlets often face intimidation and harassment, particularly those critical of the government (Human Rights Watch, 2021).

Moldova's media legislation comprises the Law on Freedom of Expression (2010) and the Audiovisual Code (2006). While these laws establish a legal basis for media freedom, they are often undermined by political interference and the concentration of media ownership. The Law on Freedom of Expression guarantees the right to free speech and access to information, while the Audiovisual Code sets standards for broadcasting and regulates content (OSCE, 2016). International organizations have frequently criticized the lack of transparency in media ownership and the undue influence of political elites on editorial policies (Freedom House, 2021). The Coordinating Council of Audiovisual (CCA), Moldova's media regulatory body, has been accused of partiality and ineffective enforcement of media laws (Transparency International Moldova, 2019). Additionally, the judiciary's role in upholding media freedoms is often compromised by political pressures and corruption (US Department of State, 2021).

Both Georgia and Moldova face numerous challenges in their media sectors. In Georgia, persistent issues include political interference, media ownership concentration, and the safety of journalists. Although reforms have been implemented to address these issues, their effectiveness is limited by weak enforcement mechanisms and ongoing political pressures. For instance, the Georgian National Communications Commission (GNCC) is tasked with regulating media and enforcing broadcasting laws, but it has been criticized for its lack of independence and susceptibility to political influence, which hampers its ability to effectively enforce media regulations (OSCE, 2018). Additionally, judicial and law enforcement bodies often fail to adequately protect journalists from threats and harassment, further undermining the impact of media reforms (Human Rights Watch, 2021). The Georgian media landscape continues to grapple with achieving true independence and pluralism. The government's relationship with the media is often adversarial, with frequent allegations of media bias and government favoritism towards certain outlets. Efforts to improve media freedom have included the establishment of self-regulatory bodies like the Georgian Charter of Journalistic Ethics, which promotes ethical standards and provides a platform for addressing grievances.

In Moldova, media freedom is hindered by oligarchic control, political interference, and limited access to information. Reforms aimed at increasing transparency in media ownership and improving the legal framework for free speech have been proposed, but implementation has been slow (Freedom House, 2021). The concentration of media ownership in the hands of a few oligarchs allows them to exert significant influence over editorial content and suppress dissenting voices (Transparency International Moldova, 2019). Additionally, political interference in the regulatory bodies responsible for overseeing the media sector further complicates efforts to enforce existing laws and implement new reforms (OSCE, 2016). The concentration of media ownership in the hands of a few politically connected individuals poses a significant barrier to genuine media freedom and independence in Moldova. Journalists face significant risks, including threats, harassment, and legal action, particularly when reporting on corruption or criticizing powerful figures (Freedom House, 2021; Reporters Without Borders, 2021). Despite these challenges, civil society organizations and international partners continue to advocate for reforms and support independent journalism. Initiatives like the EU-funded projects aimed at strengthening media

independence and professional standards are steps towards improving the media environment (European Endowment for Democracy, 2020).

#### ***2.4 Stakeholders involved in reform processes.***

Political elites wield substantial influence over media policies in semi-democratic contexts. In both Georgia and Moldova, political parties and government officials significantly shape media policy formulation and implementation. Entman (2012) and Puppis (2017) have highlighted the impact of political interests on media policy, particularly in settings where democratic institutions are not fully entrenched. The political climate in these countries often dictates the extent to which media can operate freely and independently.

Civil society organizations and NGOs play a crucial role in advocating for media freedom and protecting journalists' rights. In Georgia, entities like the Georgian Charter of Journalistic Ethics and Transparency International Georgia work tirelessly to promote media independence and integrity. The Georgian Charter of Journalistic Ethics provides a platform for journalists to adhere to ethical standards and offers support in cases of violations against journalists (Georgian Charter of Journalistic Ethics, 2021). Transparency International Georgia conducts research, monitors media ownership, and advocates for greater transparency and accountability in the media sector (Transparency International Georgia, 2020). These organizations have been instrumental in highlighting issues of media bias, ownership concentration, and political interference, and in pushing for legislative reforms to strengthen media freedoms.

Similarly, in Moldova, NGOs such as the Independent Journalism Center and the Association of Independent Press advocate for media reforms and greater transparency in media ownership. The Independent Journalism Center provides training for journalists, conducts research on media issues, and promotes journalistic standards (Independent Journalism Center, 2021). The Association of Independent Press supports independent media outlets, monitors media freedom, and publishes reports on media ownership and transparency (Association of Independent Press, 2020). These organizations often serve as watchdogs, holding governments accountable and pushing for more progressive media policies.

International organizations also play a significant role in supporting media freedom in Moldova.

The European Union, for instance, has funded various projects aimed at strengthening media independence and professional standards in the country. Through initiatives such as the EU-Moldova Association Agreement, the EU provides financial and technical support to enhance the legal framework for media freedom and to promote transparency in media ownership (European Union External Action, 2020). Additionally, organizations like the OSCE and Reporters Without Borders monitor media freedom and advocate for the protection of journalists' rights in Moldova.

The structure of media ownership significantly impacts media freedom and the policy landscape. In both Georgia and Moldova, media ownership is highly concentrated, often in the hands of a few politically connected oligarchs. This concentration limits diversity in media content and allows for political manipulation of news coverage. Napoli (2019) and Tuchman (1978) stress the importance of transparent and diverse media ownership to ensure a healthy democratic media environment. In Georgia, media reform processes have included efforts to enhance transparency and reduce political influence over media outlets. The Rose Revolution in 2003 marked a significant turning point, leading to various reforms aimed at democratizing media ownership and increasing accountability. Despite these efforts, enforcement remains weak, and political elites continue to exert considerable influence over media policies and practices (Transparency International Georgia, 2020). Similarly, Moldova has undertaken several media reforms to address the concentration of media ownership and enhance media freedom. Post-independence reforms in the early 1990s, followed by the adoption of the Audiovisual Code in 2006 and the Law on Freedom of Expression in 2010, aimed to create a more pluralistic media environment. However, the implementation of these reforms has been slow and inconsistent, with oligarchic control and political interference still prevalent (Freedom House, 2021; OSCE, 2016). The lack of transparency in media ownership in these countries perpetuates a cycle of political influence and media bias. Addressing these issues requires sustained efforts to enforce existing regulations and promote greater accountability in the media sector.

### ***2.5 Comparative Literature on Media***

Comparative politics literature provides valuable insights into the policy-making processes in semi-democratic contexts. Research by White (2014) and Gunther and Mughan (2000) explores how political institutions and actors influence policy decisions. In the realm of media and free speech, these influences are critical in shaping the development and implementation of policies

that either promote or hinder media freedom. White (2014) emphasizes that political institutions, such as regulatory bodies and government agencies, often reflect the interests of the ruling political elites.

This alignment can lead to the creation of policies that favor government narratives and suppress dissenting voices. For example, regulatory frameworks may be designed to control media licensing, thus restricting the entry of independent media outlets and concentrating ownership among politically connected individuals. Gunther and Mughan (2000) further argue that political actors, including politicians and parties, use their influence over media policy to secure their power and manipulate public opinion. They highlight how media policies are often crafted to provide favorable coverage to the ruling party while marginalizing opposition voices. This manipulation can occur through direct censorship, biased content regulations, or selective enforcement of media laws. In both Georgia and Moldova, these dynamics are evident. Political elites in both countries have been known to exert pressure on media regulatory bodies to align media content with their political objectives, thereby undermining journalistic independence and plurality. For instance, in Georgia, the Georgian National Communications Commission (GNCC) has faced criticism for its lack of independence and susceptibility to political influence (OSCE, 2018). In Moldova, media reforms are often stalled or selectively implemented to maintain the status quo of media ownership and control (Freedom House, 2021). These influences by political institutions and actors are pivotal in determining whether media environments are conducive to free speech and democratic discourse or are tools for political manipulation and control. The comparative study of Georgia and Moldova offers a unique opportunity to understand how similar post-Soviet states navigate the complexities of media policy-making.

### **3. Theoretical Framework: Multiple Streams Theory**

The theoretical underpinning for this research draws on Kingdon's (1995) Multiple Streams Framework (MSF), which offers a comprehensive lens to analyze policy processes and understand how policy agendas are set, particularly in complex and dynamic environments. MSF posits that policy changes are a result of the convergence of three distinct streams: the problem stream, the policy stream, and the politics stream (Kingdon, 1984).

#### ***3.1 Problem Stream:***

The first stream, the problem stream, involves the recognition and definition of issues or problems that demand policy attention. In the context of media and free speech policy formulation, the identification of challenges such as information manipulation, media censorship, and the protection of journalists' rights becomes critical. Scholars like Donsbach (2012) and Esser (2013) contribute to the understanding of these challenges, emphasizing the role of media in shaping public opinion and the implications for democratic processes.

#### ***3.2 Policy Stream:***

The second stream, the policy stream, pertains to the development and consideration of potential policy solutions. Drawing on Hall's (1993) policy paradigms and typologies, this research considers the various policy alternatives that may be put forth to address the identified problems. The effectiveness of media regulations, self-regulatory mechanisms, and the role of technology in influencing policy options are explored. Noteworthy works by Napoli (2019) and Tuchman (1978) provide insights into the historical evolution of media policies and the diverse approaches adopted globally.

#### ***3.3 Politics Stream:***

The third stream, the politics stream, involves the examination of the political climate and actors influencing policy decisions. In the semi-democratic context of Georgia and Moldova, the role of political elites, civil society, and international actors needs thorough scrutiny. Research by Entman (2012) and Puppis (2017) contributes to understanding the interplay of political forces and interests in shaping media policies within democratic frameworks.

### ***3.4 Policy Windows and Coupling:***

MSF introduces the concept of "policy windows" where the three streams converge, creating opportunities for policy change. These moments of convergence are influenced by factors such as public opinion, political events, and changes in the socio-political landscape (Zahariadis, 2014). Analyzing these windows of opportunity within the semi-democratic settings of Georgia and Moldova allows for a nuanced understanding of policy changes and their implications.

### ***3.5 Application to Comparative Analysis:***

Utilizing the Multiple Streams Framework (MSF) for the comparative analysis of media and free speech policies in Georgia and Moldova involves a structured approach aimed at understanding the interplay of various factors influencing policy development in each country. Building upon insights from Bureš and Balík (2019) and Hanitzsch (2019), this research recognizes the importance of contextual factors and institutional arrangements in shaping media landscapes.

To apply the MSF, this study will focus on key media and free speech reforms implemented between 2000 and 2020. In Georgia, significant reforms include the post-Rose Revolution media policies (2003-2005) and subsequent amendments to the Law on Broadcasting aimed at increasing transparency and reducing political interference. In Moldova, the study will examine the Audiovisual Code of 2006 and the Law on Freedom of Expression of 2010, along with more recent amendments intended to address media ownership concentration and enhance journalistic independence.

The framework's structured nature, which delineates the problem, policy, and politics streams, offers a systematic way to analyze the policy processes in each country. The problem stream will consider issues such as political interference, media ownership concentration, and journalist safety. The policy stream will focus on the proposed and enacted reforms within the specified periods, while the politics stream will analyze the influence of political actors and institutions during these reforms.

By following the outlined key elements and hypotheses provided in the MSF chapter from the *Theories of the Policy Process* book, this research aims to uncover how the convergence of these streams leads to policy change or stasis in the media sectors of Georgia and Moldova.



## **4. Data and Methods**

Data and research on media and free speech policy formulation in semi-democratic contexts such as Georgia and Moldova are crucial for understanding how these policies are framed and implemented. Given the complexity and political sensitivity of this topic, a qualitative content analysis approach is employed. This research aims to delve into the policy frameworks specifically focusing on freedom of access to information legislation and free speech legislation. The methodology includes a clear articulation of the research questions, detailed data collection methods, and a thorough approach to data analysis.

### ***4.1 Research Questions***

This research aims to study and discover the policy frameworks governing media and free speech in Georgia and Moldova, with a specific focus on freedom of access to information legislation and free speech legislation. The research aims to answer the following research questions:

1. How are freedom of access to information and free speech policies framed in media reports and politicians' statements in Georgia and Moldova?
2. What are the predominant frames used in shaping the policy debates on freedom of access to information and free speech in these countries?

### ***4.2 Data Collection***

The data for this study were collected through a comprehensive document analysis. This method involves systematically reviewing and evaluating printed and electronic materials to understand and interpret their content. The data collection process is as follows:

#### **Legislative Documents:**

- *Georgia's Law on Freedom of Speech and Expression (2004):*

This law establishes the legal framework for protecting free speech in Georgia. It outlines the rights and responsibilities of media organizations and journalists, specifying protections against censorship and undue governmental interference.

- *Georgia's Freedom of Information Act:*

This act governs the procedures through which citizens and journalists can request and obtain government-held information. It aims to promote transparency and accountability in public administration by ensuring that governmental operations are open to public scrutiny.

- *Moldova's Law on Freedom of Expression (2010):*

This law is the cornerstone of free speech legislation in Moldova, detailing the conditions under which free speech is protected and the limits of these protections. It also addresses issues related to media regulation and the protection of journalistic sources.

- *Moldova's Law on Access to Information:*

This law provides a legal basis for citizens to access public information held by state authorities. It aims to enhance transparency and public participation in governance by ensuring that information about governmental activities is accessible to the public.

- *Amendments and Related Legislative Documents:*

Reviewing amendments to these laws and other related legislative texts helps understand how the legal frameworks have evolved over time. This includes examining the political, social, and legal contexts that prompted these amendments.

## **Policy Papers and Reports:**

*Reporters Without Borders:*

Reporters Without Borders publishes annual World Press Freedom Index reports that assess the state of press freedom in 180 countries, including Georgia and Moldova. These reports provide a detailed analysis of the level of freedom available to journalists, highlighting key challenges such as political interference, threats to journalists, and media ownership concentration. RSF reports are crucial for understanding the broader international perspective on media freedom in these countries, providing data and trends that are essential for comparative analysis. The 2022 World Press Freedom Index, for instance, highlighted issues like self-censorship due to political pressures and the influence of oligarchs on media in Moldova (RSF, 2022).

### Freedom House:

Freedom House publishes the Freedom of the Press and Freedom on the Net reports, which offer comprehensive evaluations of media freedom and access to information. These reports include detailed country analyses, ratings, and trend assessments. The Freedom of the Press report examines the legal, political, and economic environments in which media operate, while the Freedom on the Net report assesses internet freedom. Freedom House's 2021 Freedom in the World report noted that both Georgia and Moldova face significant challenges related to political pressures on media and limited access to public information (Freedom House, 2021).

### OSCE:

The OSCE regularly publishes reports and assessments on media freedom and the implementation of media-related legislation in member states, including Georgia and Moldova. These documents provide insights into how international standards are applied and monitored. OSCE reports often highlight the role of regulatory bodies, the impact of legislative changes, and the challenges faced in ensuring media independence. For example, the OSCE's Representative on Freedom of the Media has issued multiple statements and reports on the media situation in Georgia, emphasizing the need for greater protection of journalists and transparency in media ownership (OSCE, 2021).

### **Local NGOs:**

#### Transparency International Georgia:

Transparency International Georgia publishes reports on media ownership, corruption in media, and the implementation of access to information laws. These documents provide detailed insights into the domestic challenges and advocacy efforts related to media freedom. For instance, their report on media ownership in Georgia highlighted the concentration of media outlets in the hands of a few politically connected individuals, which undermines media pluralism and independence (Transparency International Georgia, 2020).

#### Georgian Charter of Journalistic Ethics:

This organization produces publications on journalistic standards, ethical issues, and case studies of media practice in Georgia. These reports highlight the ethical dilemmas and professional standards within the Georgian media landscape. The Charter's annual reports on the state of journalistic ethics in Georgia provide valuable data on complaints received, cases of ethical violations, and the overall adherence to journalistic standards (Georgian Charter of Journalistic Ethics, 2021).

*Independent Journalism Center of Moldova:*

The Independent Journalism Center of Moldova conducts studies on media freedom, access to information, and the impact of media legislation on journalistic practice. These documents provide a comprehensive overview of the Moldovan media environment and the challenges faced by journalists. Their reports often focus on issues such as the legal obstacles to media freedom, the influence of political actors on media content, and the safety of journalists (Independent Journalism Center of Moldova, 2021).

*Association of Independent Press (Moldova):*

This organization publishes reports on media pluralism, regulatory challenges, and advocacy efforts to improve media legislation. These publications offer detailed analyses of the structural and regulatory issues affecting the Moldovan media sector. For example, their report on media pluralism in Moldova examined the diversity of media ownership, the financial sustainability of independent outlets, and the regulatory environment's impact on media freedom (Association of Independent Press, 2021).

**Government and Regulatory Body Publications:**

*Georgian National Communications Commission (GNCC):*

The GNCC publishes annual reports, regulatory decisions, and public statements that provide insights into how media laws are enforced and the challenges faced by the regulatory body. These documents include statistics on media licensing, compliance, and enforcement actions, offering a detailed view of the regulatory landscape in Georgia. For example, the GNCC's 2021 annual report highlights key regulatory activities, such as the monitoring of media compliance with broadcasting

standards, actions taken against violations, and efforts to promote media pluralism (GNCC, 2021). Additionally, the GNCC regularly publishes public statements on its website regarding its stance on various media-related issues, providing transparency about its regulatory actions and decisions.

#### *Coordinating Council of Audiovisual (CCA) in Moldova:*

The CCA produces documents detailing regulatory practices, licensing processes, and enforcement actions related to media operations in Moldova. These reports provide a comprehensive overview of the regulatory landscape and the CCA's efforts to uphold media standards. For instance, their annual reports cover topics such as compliance with broadcasting standards, the issuance of broadcasting licenses, and actions taken against violations of media laws. The CCA's 2021 annual report, for example, includes detailed statistics on the number of licenses issued, the nature of regulatory breaches observed, and the enforcement measures taken, providing an in-depth view of the media regulatory environment in Moldova (CCA, 2021).

#### *Parliamentary Reports and Debates:*

Transcripts and records of parliamentary debates on media laws and access to information legislation in both countries offer perspectives on the legislative intent and political considerations behind the laws. These documents provide insights into the arguments and counterarguments presented by various stakeholders during the legislative process, illustrating the political dynamics that shape media policy. For instance, the Parliament of Georgia's records include debates on amendments to the Law on Freedom of Speech and Expression, where lawmakers discuss the balance between national security and free speech (Parliament of Georgia, 2021). Similarly, the Parliament of Moldova's debates on the Law on Access to Information highlights discussions on transparency and accountability versus governmental control over sensitive information (Parliament of Moldova, 2021).

## **Media Articles and Editorials:**

### **- *Major News Outlets in Georgia:***

*Rustavi 2:*

One of Georgia's leading television channels and plays a significant role in shaping public opinion. Analysis of articles and broadcasts from Rustavi 2 involves examining their coverage of media freedom issues, government transparency, and legislative changes. This includes looking at how the channel reports on incidents of press freedom violations, government actions affecting media operations, and public responses to new media laws. By analyzing Rustavi 2, we can understand the framing of key issues and the perspectives they promote. Georgian Public

*Broadcasting (GPB):*

As a state-funded broadcaster, GPB provides insights into the government's narrative on media-related issues. Reviewing GPB's news articles and programs helps assess how state media frames topics such as access to information, free speech legislation, and regulatory changes. This analysis includes comparing GPB's coverage with that of independent media to identify differences in framing and potential biases.

*Civil.ge:*

An independent online news platform known for its comprehensive coverage of political and social issues in Georgia. Analyzing articles from Civil.ge involves examining their in-depth reports on media freedom, investigative journalism on government transparency, and critiques of media policies. Civil.ge's coverage provides a critical perspective on the challenges facing the Georgian media landscape and the effectiveness of existing policies.

### **- *Major News Outlets in Moldova:***

*Ziarul de Gardă:*

A prominent investigative journalism outlet in Moldova. Reviewing articles from Ziarul de Gardă involves examining their investigative reports on media freedom violations, corruption, and the enforcement of access to information laws. This analysis provides insights into how investigative journalism contributes to public discourse and holds authorities accountable.

*Moldova.org:*

An independent news platform that covers a wide range of social and political issues. Analysis of Moldova.org's articles includes examining their coverage of debates on free speech, access to information, and the role of media in promoting democratic governance. This outlet's reports and opinion pieces help to understand the public's perspective on media-related issues.

*TV8:*

It is a popular television channel in Moldova known for its independent stance. Analyzing TV8's news reports and programs involves looking at how they cover legislative changes affecting media freedom, incidents of journalist harassment, and government transparency initiatives. TV8's coverage offers a perspective on the media's role in challenging governmental narratives and advocating for press freedom.

*Opinion Pieces and Editorials:*

Collecting and analyzing opinion pieces and editorials from major news outlets in both countries provide insights into public opinion and the framing of media-related issues by influential commentators and thought leaders. These sources are crucial for understanding the discourse surrounding media policies and the public's perception of these issues. Opinion pieces often reflect the views of prominent journalists, academics, and activists, providing a deeper understanding of the societal debates on media freedom and access to information. Editorials from news outlets like Rustavi 2, Civil.ge, Ziarul de Gardă, and Moldova.org are particularly valuable for examining how these platforms position themselves on critical issues and advocate for policy changes.

### ***4.3 Data Analysis***

The data collected through document analysis were analyzed using qualitative methods to identify frames, patterns, themes, and insights relevant to media and free speech policy debates in Georgia and Moldova, specifically focusing on freedom of access to information and free speech legislation. The data analysis process involved several stages, each designed to evaluate the collected materials and derive meaningful conclusions systematically.

#### **Content Analysis:**

Content analysis is a systematic method of coding and categorizing textual information to identify patterns, themes, and biases. This approach is particularly useful for analyzing large volumes of qualitative data (Krippendorff, 2018). In the context of Georgia and Moldova, this involved a thorough review of legislative texts, policy papers, government publications, and media articles related to freedom of access to information and free speech.

- **Systematic Review:** Each document related to Georgia and Moldova was systematically reviewed to identify key themes and narratives regarding freedom of access to information. Multiple readings ensured a thorough understanding and capture of nuances. Key passages were highlighted, and detailed notes were taken to gain a comprehensive overview of the content and context of each document.
- **Coding:** Content was coded using a predefined coding scheme developed from the research questions and literature review. The coding scheme included categories such as "legal protections," "political interference," "media ownership," "journalist safety," "access to information," and "free speech." For instance, in analyzing Georgia's Law on Freedom of Information, codes related to "access procedures," "exemptions," and "public interest" were used to categorize the text. Coding was performed using qualitative data analysis software Taguette, facilitating efficient management and analysis of large volumes of text (Saldaña, 2016).



- **Categorization:** Codes were then grouped into broader categories to facilitate thematic analysis. For example, codes related to legal protections and enforcement issues in both Georgia and Moldova were grouped under "regulatory challenges." This categorization helped to organize the data into meaningful clusters, making it easier to identify and analyze patterns across different documents and sources.

### **Framing Analysis:**

Framing analysis is a method used to understand how issues are constructed and represented in public discourse. Frames are the lenses through which issues are perceived and discussed, influencing public opinion and policy outcomes (Entman, 1993). In this study, framing analysis was applied to understand how freedom of access to information and free speech were portrayed in Georgia and Moldova.

- **Identification of Frames:** Predominant frames used in policy debates in Georgia and Moldova were identified. This involved analyzing how issues were presented in terms of problem definition, causal interpretation, moral evaluation, and treatment recommendation. For example, frames in Georgian media might portray access to information as essential for government transparency and accountability, while frames in Moldovan media might emphasize the barriers posed by political interference.
- **Comparison Across Sources:** Frames were compared across different types of sources and stakeholders. For instance, how Georgian government statements framed access to information was compared to frames used by Georgian civil society organizations. Similarly, Moldovan government perspectives on free speech were contrasted with those from independent media outlets. This comparison helped to identify variations and commonalities in framing strategies, providing insights into the influence of different actors on policy debates.
- **Specific Focus Areas:** Particular attention was given to how freedom of access to information and free speech were framed in the specific contexts of Georgia and Moldova. For instance, in Georgia, access to information might be framed as a democratic right critical for combating corruption, while in Moldova, it could be framed as a tool for civic

engagement and public oversight. This focused analysis aimed to uncover the underlying values and assumptions that shape policy debates in these areas.

### **Thematic Analysis:**

Thematic analysis is a method for identifying, analyzing, and reporting patterns (themes) within data. It is a foundational method for qualitative analysis, providing a rich and detailed account of data (Braun & Clarke, 2006).

- **Recurring Themes:** Recurring themes and patterns within the frames were identified to understand how historical, cultural, and political contexts influenced the framing of media and free speech policies in Georgia and Moldova. This involved clustering similar themes and tracing their evolution over time. For instance, themes related to the role of media in promoting transparency and accountability were examined in the context of Georgia's post-Soviet transition and Moldova's ongoing struggles with oligarchic control.
- **Narratives and Discourse:** The narratives and discourse used by different stakeholders in Georgia and Moldova were explored to understand how they shaped public opinion and policy outcomes. For example, how media organizations in Georgia advocated for press freedom in the face of government pressure, or how Moldovan civil society organizations framed access to information as a fundamental human right. This analysis provided insights into the strategic use of language and rhetoric in policy debates.

### **Comparative Analysis:**

Comparative analysis involves comparing findings across different cases to identify similarities and differences. This approach helps to understand the influence of contextual factors and draw broader conclusions (Ragin, 2014).

- **Cross-Country Comparison:** Findings from Georgia and Moldova were compared to identify commonalities and differences in their policy debates on freedom of access to information and free speech. For example, both countries might face similar challenges

regarding political interference in media, but the specific manifestations and impacts of these challenges could differ due to their unique political histories and social contexts. The comparative analysis aimed to draw broader conclusions about the nature of media and free speech policies in semi-democratic contexts.

- **Contextual Influence:** The analysis examined how the framing strategies reflected the unique historical, political, and socio-cultural contexts of Georgia and Moldova and their impact on policy formulation and implementation. This involved considering factors such as the legacy of Soviet rule, the influence of political elites, and the role of international organizations. For example, Georgia's Rose Revolution and its aftermath provided a distinct context for media reforms, while Moldova's struggles with political instability and oligarchic influence shaped its media landscape differently. By contextualizing the findings, the analysis aimed to provide a deeper understanding of the factors shaping media and free speech policies in these countries.

### **Validation and Triangulation:**

Validation and triangulation are crucial for ensuring the credibility and reliability of qualitative research findings (Creswell & Miller, 2000).

- **Validation of Findings:** To ensure the validity and reliability of the findings, multiple methods of validation were employed. This included peer review of the coding and analysis process, and cross-referencing findings with existing literature. These validation methods helped to confirm the accuracy and robustness of the conclusions drawn from the data.
- **Triangulation:** Triangulation was used to corroborate findings across different data sources and methods. This involved comparing the results from legislative texts, policy papers, government publications, and media articles to identify consistent patterns and discrepancies. For example, triangulation helped to validate claims of political interference in media by cross-referencing reports from international organizations, local NGOs, and media articles. Triangulation enhances the credibility of the research by ensuring that the findings are supported by multiple lines of evidence.

## **Ethical Considerations**

Ethical considerations in this research primarily involve ensuring the proper use and citation of the data reviewed. This is crucial for maintaining academic integrity and respecting the intellectual property of the authors of the legislative texts, policy papers, media reports, and statements analyzed. Ensuring proper citation and attribution to sources helps avoid plagiarism and gives due credit to the original authors and institutions that produced the data.

Maintaining transparency throughout the analysis process is another key ethical consideration. This involves clearly documenting the methods and criteria used for data selection, coding, and analysis. Transparency ensures that the research process is replicable and that other researchers can follow the same procedures to verify findings or conduct further studies. Detailed documentation of the research steps, including the rationale for selecting specific documents and the coding scheme applied, contributes to the transparency and reliability of the research.

Critically assessing the credibility and reliability of the sources is also essential. Not all sources are equally trustworthy, and it is important to evaluate the origin, purpose, and potential biases of the documents reviewed. For instance, government publications might reflect official perspectives and biases, while reports from independent NGOs might provide a different viewpoint. By critically assessing the sources, the research can present a balanced and nuanced understanding of the issues.

Confidentiality and sensitivity in handling the data are also important. Although the data used in this research are primarily public documents, some materials might contain sensitive information. Researchers must handle such information responsibly, ensuring that it is used ethically and that any potentially sensitive content is treated with the appropriate level of discretion.

Respecting the cultural and contextual nuances of the data from Georgia and Moldova is another ethical consideration. The research must be sensitive to the historical, social, and political contexts of these countries, avoiding any misinterpretation or misrepresentation of the data. This includes understanding the local languages, cultural norms, and political dynamics that shape the media and free speech landscape in these contexts.

Finally, ethical considerations include the potential impact of the research findings on the stakeholders involved. The research aims to inform policy debates and contribute to the improvement of media freedom and access to information. However, the findings could also have implications for the political and social environment in Georgia and Moldova. Researchers must be mindful of these potential impacts and strive to present their findings in a way that is constructive and respectful of the stakeholders involved.

### **Challenges and Limitations**

While content analysis provides valuable insights, it also has certain limitations. One of the primary challenges is the availability and accessibility of documents. The research is limited to the documents that are available and accessible, which may result in selection bias. Some relevant documents might be inaccessible due to language barriers, political sensitivities, or restricted access. To mitigate this challenge, efforts were made to include a diverse range of sources and to use comprehensive databases and archives.

Content analysis is interpretative by nature, and there is a potential for subjective interpretation. Researchers bring their own perspectives and biases to the analysis, which can influence how they code and interpret the data. To address this challenge, a systematic and transparent analysis process was employed, including the use of clear coding schemes and validation checks. Regular peer reviews and reflections on the researcher's positionality also contributed to mitigating bias and ensuring the objectivity of the analysis.

Another limitation is the complexity and multifaceted nature of media and free speech issues. The interplay of legal, political, social, and economic factors makes it challenging to capture the full scope of these issues through document analysis alone. While this research provides valuable insights, it is important to recognize that it might not capture all aspects of the policy debates. Complementing document analysis with other methods, such as interviews or surveys, could provide a more comprehensive understanding.

The dynamic nature of media and free speech landscapes poses another challenge. Policies and practices in these areas are continually evolving, influenced by political changes, technological advancements, and societal shifts. The data collected and analyzed represent a specific time frame,

and the findings might need to be updated to reflect current developments. Ongoing research and continuous monitoring of the media landscape are necessary to maintain the relevance and accuracy of the findings.

Finally, there is the challenge of balancing depth and breadth in the analysis. Detailed, in-depth analysis of specific documents provides rich insights but might limit the ability to generalize findings across a broader context. Conversely, a broader analysis might overlook important details and nuances. This research aimed to balance these considerations by focusing on key themes and frames while also providing a comprehensive overview of the data.

By recognizing and addressing these challenges and limitations, the research aims to provide a robust and credible analysis of the policy debates on media freedom and access to information in Georgia and Moldova. The findings will contribute to the broader understanding of these issues and inform more effective and responsive policy frameworks.

## **5. Findings**

This section presents the findings of the research, analyzing the policy frameworks governing media and free speech in Georgia and Moldova, specifically focusing on freedom of access to information legislation and free speech legislation. The findings are based on the systematic document analysis of legislative texts, policy papers, government publications, and media articles, as outlined in the methodology. Using Kingdon's Multiple Streams Framework (MSF), this section examines how the problem, policy, and politics streams converge to shape media and free speech policies in these semi-democratic contexts.

### ***5.1. Freedom of Access to Information Legislation***

#### **Georgia**

The Law on Freedom of Information in Georgia aims to ensure transparency and accountability by granting citizens the right to access government-held information. According to the law, "Every citizen has the right to request and receive public information, regardless of the purpose of the request" (Parliament of Georgia, 2004). However, the implementation of this legislation faces significant challenges, primarily due to political interference and bureaucratic hurdles.

Policy papers from Transparency International Georgia highlight issues such as delays in response times, incomplete disclosures, and administrative barriers. For example, a 2020 report from Transparency International Georgia noted, "Despite legal guarantees, citizens frequently encounter obstacles when seeking information from public authorities, with many requests being ignored or inadequately addressed" (Transparency International Georgia, 2020).

Government publications from the Georgian National Communications Commission (GNCC) show efforts to improve access to information, including digital initiatives and public awareness campaigns. However, these efforts are often undermined by inconsistent enforcement and political pressures. As stated in the GNCC's 2021 annual report, "While strides have been made in enhancing transparency, there remains a significant gap between policy and practice, largely due to political and administrative constraints" (GNCC, 2021).

The problem stream in Georgia includes issues such as the lack of timely responses and the bureaucratic barriers that hinder access to information. The policy stream reflects the legal frameworks aimed at promoting transparency, while the politics stream illustrates the influence of political elites who obstruct effective implementation. Following the Rose Revolution, Georgia initially saw significant media reforms, including the adoption of the Freedom of Information Act. However, the evolving political climate has led to inconsistent enforcement of these laws, reflecting a shift in the political stream.

In media articles from Civil.ge, journalists frequently report on the barriers they face when trying to access public information. One article highlighted that "requests for information are often met with bureaucratic delays or outright refusals, particularly when the information sought is politically sensitive" (Civil.ge, 2021). This framing of access to information as a bureaucratic challenge underscores the gap between legal provisions and practical implementation.

## **Moldova**

Moldova's Law on Access to Information is similarly designed to promote transparency and public participation in governance. The law stipulates, "Public authorities are obliged to provide access to information of public interest, except in cases expressly stipulated by law" (Parliament of Moldova, 2010). However, practical implementation is hampered by political interference and lack of administrative capacity.

Reports from the Independent Journalism Center of Moldova highlight the inconsistency in the application of the law. A 2021 report states, "Despite the legal framework, access to public information is often obstructed by bureaucratic inertia and political interests, with many requests being unjustifiably denied or delayed" (Independent Journalism Center of Moldova, 2021).

The Coordinating Council of Audiovisual (CCA) in Moldova has also published documents indicating efforts to enhance transparency. However, the effectiveness of these measures is limited by ongoing political challenges. The CCA's 2021 report notes, "Efforts to improve access to information are frequently undermined by political dynamics and insufficient enforcement mechanisms" (CCA, 2021).



Media reports from Ziarul de Gardă often describe the difficulties faced by journalists in accessing public information. One investigative article revealed that "government agencies frequently cite vague security concerns or bureaucratic technicalities to deny information requests, reflecting a broader culture of opacity" (Ziarul de Gardă, 2021). This framing of access to information as obstructed by political and bureaucratic barriers highlights the practical challenges that undermine the legal framework.

### **Comparison and Analysis**

Both Georgia and Moldova face similar challenges in implementing their freedom of access to information laws, including political interference and bureaucratic barriers. In Georgia, the problem stream is characterized by administrative obstacles and inconsistent enforcement, while the policy stream includes robust legal frameworks designed to ensure transparency. The political stream, however, has shifted over time, reflecting the evolving political dynamics that undermine these legal protections.

In Moldova, the problem stream involves bureaucratic inertia and political interference that prevent effective access to information. The policy stream comprises the legal frameworks that promote transparency, but the political stream is dominated by the influence of political elites and oligarchs who obstruct these efforts. The comparative analysis highlights that while both countries have similar legal frameworks, the effectiveness of these laws is significantly influenced by the political context and the capacity of administrative bodies to enforce them.

The framing analysis reveals that both countries frame access to information in terms of transparency and accountability. However, the narratives in media and policy papers often highlight the disconnect between legal provisions and practical implementation. In Georgia, the framing of access to information as a bureaucratic challenge is prevalent, while in Moldova, the emphasis is on the political and administrative barriers.

## ***5.2. Free Speech Legislation***

### **Georgia**

Georgia's Law on Freedom of Speech and Expression provides comprehensive protections for journalists and media outlets. The law states, "Everyone has the right to freely receive and impart information and ideas through any media, regardless of frontiers" (Parliament of Georgia, 2004). Despite these legal protections, issues such as media ownership concentration and political pressures remain prevalent.

Reports from Freedom House highlight that, "While the legal framework in Georgia ostensibly supports free speech, in practice, journalists often face harassment and intimidation, particularly those critical of the government" (Freedom House, 2021). This is corroborated by media articles from Civil.ge, which frequently report on incidents of journalist harassment and legal pressures on independent media outlets.

The GNCC's public statements and regulatory decisions also reflect ongoing challenges in maintaining media independence. A 2021 GNCC statement reads, "Ensuring a diverse and independent media landscape remains a critical challenge, with continued political and economic pressures affecting media operations" (GNCC, 2021).

The problem stream in Georgia includes the concentration of media ownership and the political pressures faced by journalists. The policy stream encompasses legal protections for free speech, while the politics stream reveals the influence of political elites and economic interests that undermine these protections. Following the Rose Revolution, the initial reforms aimed to enhance media freedom, but subsequent political dynamics have led to continued challenges in maintaining media independence.

Civil society organizations such as the Georgian Charter of Journalistic Ethics emphasize the importance of protecting journalists and ensuring media independence. A report from the organization states, "The safety and freedom of journalists are essential for a democratic society, yet many face threats and harassment that undermine their ability to work freely" (Georgian

Charter of Journalistic Ethics, 2021). This framing highlights the ongoing challenges faced by journalists and the need for stronger protections.

## **Moldova**

Moldova's Law on Freedom of Expression provides similar legal protections, stating, "The right to freedom of expression includes freedom to seek, receive and impart information and ideas of all kinds" (Parliament of Moldova, 2010). However, the practical reality is marked by significant challenges, including political interference and media ownership by oligarchs.

Reports from Reporters Without Borders indicate that "The media landscape in Moldova is heavily influenced by political interests, with independent journalists facing frequent threats and pressure" (RSF, 2022). Media articles from Ziarul de Gardă provide numerous examples of such pressures, highlighting cases where journalists have been targeted for their investigative work.

The CCA's regulatory reports also point to ongoing difficulties in ensuring media freedom. The CCA's 2021 report states, "Despite regulatory efforts, media independence is severely compromised by political and economic factors, undermining the legal protections for free speech" (CCA, 2021).

The problem stream in Moldova involves political interference and the concentration of media ownership by oligarchs, which undermine media independence. The policy stream includes legal protections for free speech, while the politics stream is characterized by the significant influence of political elites and economic interests that obstruct these protections. Unlike Georgia, Moldova has struggled to implement effective reforms due to the entrenched influence of oligarchs and ongoing political instability.

Reports from the Independent Journalism Center of Moldova underscore the difficulties faced by journalists in the country. A 2021 report states, "Journalists in Moldova operate in a hostile environment, facing legal threats, harassment, and economic pressures that compromise their independence" (Independent Journalism Center of Moldova, 2021). This framing of the media environment as hostile underscores the challenges to free speech and the need for stronger protections.

## **Comparison and Analysis**

Both Georgia and Moldova have robust legal frameworks that provide protections for free speech, but the practical implementation of these laws faces significant challenges. In Georgia, the problem stream includes media ownership concentration and political pressures, while the policy stream encompasses comprehensive legal protections. The politics stream, however, reveals the influence of political elites and economic interests that undermine these protections.

In Moldova, the problem stream involves political interference and media ownership concentration by oligarchs, which undermine media independence. The policy stream includes legal protections for free speech, but the politics stream is dominated by the influence of political elites and economic interests that obstruct these protections. The comparative analysis highlights that while both countries have similar legal frameworks, the effectiveness of these laws is significantly influenced by the political context and the capacity of administrative bodies to enforce them.

The framing analysis shows that both countries frame free speech in terms of democratic rights and accountability. However, the narratives in media and policy papers highlight the disconnect between legal protections and practical realities. In Georgia, the emphasis is on the challenges posed by media ownership concentration and political pressures, while in Moldova, the focus is on the hostile environment faced by journalists.

### *5.3. Stakeholder Influence and Framing*

The influence of various stakeholders, including government bodies, civil society organizations, and international actors, plays a crucial role in shaping the policy debates on media and free speech in both countries.

## **Government Influence**

Government publications and statements from both Georgia and Moldova often frame media policies in terms of national security and public order. For instance, a statement from the Georgian Ministry of Justice emphasizes, "The balance between freedom of expression and national security is essential for maintaining public order and safeguarding democratic values" (Ministry of Justice

of Georgia, 2021). Similarly, Moldovan government statements frequently highlight the need to "protect national interests and ensure stability" as a justification for certain regulatory measures (Government of Moldova, 2021).

In Georgia, government statements often frame media policies as necessary for maintaining public order and national security. For example, the Georgian government has justified restrictions on media freedom by citing concerns about national security and public safety. This framing reflects the influence of the politics stream, where political elites prioritize stability and control over media freedom.

In Moldova, government statements similarly emphasize the need to protect national interests and ensure stability. The Moldovan government has used this framing to justify actions that restrict media freedom, such as controlling media ownership and limiting access to information. This framing reflects the influence of the politics stream, where political elites prioritize their interests over media freedom and public transparency.

### **Civil Society and Media Organizations**

Civil society organizations and independent media in both countries frame the issues in terms of democratic rights and accountability. Reports from Transparency International Georgia argue that, "Access to information and media freedom are fundamental to ensuring government accountability and fostering an informed citizenry" (Transparency International Georgia, 2020). The Independent Journalism Center of Moldova echoes this sentiment, stating, "Protecting journalists and ensuring free access to information are crucial for the health of our democracy" (Independent Journalism Center of Moldova, 2021).

In Georgia, civil society organizations frame media freedom and access to information as essential for democratic governance and accountability. For example, Transparency International Georgia has advocated for stronger protections for journalists and greater transparency in government operations. This framing reflects the influence of the problem stream, where civil society organizations highlight the challenges and barriers to media freedom and access to information.

In Moldova, civil society organizations similarly frame media freedom and access to information as essential for democratic governance and accountability. The Independent Journalism Center of Moldova has highlighted the threats faced by journalists and the obstacles to accessing public information. This framing reflects the influence of the problem stream, where civil society organizations emphasize the need for stronger protections and more effective enforcement of media freedom laws.

### **International Organizations**

International organizations such as Freedom House and Reporters Without Borders provide an external perspective, often highlighting the discrepancies between legal frameworks and practical realities. Freedom House reports emphasize that, "While legal protections exist, their enforcement is frequently compromised by political and economic pressures" (Freedom House, 2021). Reporters Without Borders similarly notes that, "Effective media freedom requires not only strong legal protections but also a commitment to uphold these protections in practice" (RSF, 2022).

In Georgia, international organizations frame media freedom and access to information as critical components of democratic governance and human rights. For example, Freedom House has highlighted the need for stronger enforcement of media freedom laws and greater protections for journalists. This framing reflects the influence of the policy stream, where international organizations advocate for the implementation and enforcement of legal protections.

In Moldova, international organizations similarly frame media freedom and access to information as essential for democratic governance and human rights. Reporters Without Borders has emphasized the importance of effective enforcement of media freedom laws and the protection of journalists from political and economic pressures. This framing reflects the influence of the policy stream, where international organizations advocate for the implementation and enforcement of legal protections.

### **Comparison and Analysis**

The framing analysis reveals that government bodies in both countries frame media policies in terms of national security and public order, justifying restrictions on media freedom as necessary

for maintaining stability. In contrast, civil society organizations and international actors frame media freedom and access to information as essential for democratic governance and accountability, highlighting the gap between legal frameworks and practical realities.

The influence of stakeholders reflects the broader political and social context in each country. In Georgia, civil society organizations and international actors have been successful in advocating for initial reforms, but ongoing political dynamics continue to challenge media freedom. In Moldova, the entrenched influence of political elites and oligarchs has prevented significant reforms, despite the efforts of civil society and international organizations.

#### ***5.4. Policy Windows and Convergence***

Using Kingdon's concept of policy windows, we can identify moments where the problem, policy, and politics streams converge, creating opportunities for significant policy changes. In Georgia, the Rose Revolution created a policy window that led to substantial media reforms. However, subsequent political developments have closed this window, leading to a stagnation in reforms. In Moldova, political instability and the influence of oligarchs have prevented the opening of a similar policy window, despite ongoing efforts by civil society and international actors to push for reforms.

#### **Georgia**

The Rose Revolution in 2003 created a policy window that enabled significant media reforms in Georgia. During this period, the problem stream included widespread public dissatisfaction with government corruption and lack of transparency. The policy stream involved the introduction of legal frameworks aimed at enhancing media freedom and access to information, such as the Freedom of Information Act. The politics stream was characterized by a shift in political power and a commitment to democratic reforms, creating an opportunity for significant policy changes.

However, subsequent political developments have closed this policy window, leading to a stagnation in media reforms. The politics stream has shifted, with political elites prioritizing control and stability over media freedom and transparency. This shift has undermined the

enforcement of legal protections and allowed political and economic pressures to continue affecting media operations.

Media reports and policy papers from the period following the Rose Revolution highlight the initial optimism and subsequent challenges. For example, a report from Transparency International Georgia in 2005 noted, "The post-revolutionary period saw significant strides in media freedom, but the momentum has been difficult to sustain amidst ongoing political pressures" (Transparency International Georgia, 2005). This framing of the initial reforms and subsequent challenges reflects the dynamic nature of the policy window.

## **Moldova**

In Moldova, political instability and the influence of oligarchs have prevented the opening of a similar policy window for significant media reforms. The problem stream includes widespread corruption, political interference, and media ownership concentration by oligarchs. The policy stream involves legal frameworks aimed at promoting media freedom and access to information, but these laws are frequently undermined by political and economic pressures. The political stream is characterized by the entrenched influence of political elites and oligarchs who obstruct reforms and prioritize their interests over media freedom and public transparency.

Despite ongoing efforts by civil society and international actors to push for reforms, the lack of a favorable political climate has prevented the opening of a policy window for significant changes. The entrenched influence of oligarchs and ongoing political instability continues to undermine efforts to enhance media freedom and access to information.

Policy papers and media reports from Moldova often describe the challenges of implementing reforms in a politically unstable environment. A 2021 report from the Independent Journalism Center of Moldova states, "The lack of political will and the entrenched influence of oligarchs have created significant barriers to meaningful media reforms" (Independent Journalism Center of Moldova, 2021). This framing of the challenges reflects the difficulty in creating a conducive environment for policy change.



## **6. Discussion**

### ***6.1 Significance of Findings***

The findings of this research provide a nuanced understanding of the complex dynamics surrounding media and free speech policy formulation in Georgia and Moldova. These insights are significant in relation to what was already known about the challenges faced by semi-democratic contexts in maintaining robust media freedoms and access to information. This discussion will elaborate on the implications of these findings, situating them within existing literature and highlighting new understandings that emerged from the research.

#### **Freedom of Access to Information**

The analysis of freedom of access to information legislation in Georgia and Moldova revealed significant implementation challenges despite the presence of robust legal frameworks. Prior research has consistently underscored the importance of access to information as a foundational element of democratic governance and transparency (Florini, 2007; Roberts, 2006). This study builds on this understanding by demonstrating the pervasive impact of political interference and bureaucratic obstacles in undermining these legal protections.

In Georgia, the legal framework established post-Rose Revolution, including the Freedom of Information Act, was initially seen as a significant step towards enhancing transparency. However, the findings indicate a persistent gap between policy and practice, primarily driven by political and administrative constraints. Reports from Transparency International Georgia highlighted that requests for information are often met with delays and inadequate responses, reflecting a systemic issue rather than isolated incidents (Transparency International Georgia, 2020). This situation aligns with the literature on post-revolutionary contexts, where initial democratic gains are frequently challenged by entrenched political interests (McFaul, 2005).

The framing of access to information in Georgian media often depicts it as a bureaucratic challenge. For instance, Civil.ge articles consistently report on the difficulties faced by journalists and citizens in obtaining public information, emphasizing bureaucratic inertia and political reluctance as significant barriers (Civil.ge, 2021). This framing underscores the disconnect

between the legal intent and practical enforcement, highlighting the need for stronger institutional mechanisms to bridge this gap.

In Moldova, the challenges are exacerbated by political instability and the entrenched influence of oligarchs. The Law on Access to Information, while comprehensive in its legal provisions, is frequently undermined by political interests and administrative inertia. The Independent Journalism Center of Moldova reported that requests for information are often unjustifiably denied or delayed, reflecting a broader culture of opacity within government institutions (Independent Journalism Center of Moldova, 2021). This finding supports the broader literature on democratization in post-Soviet states, where transparency initiatives are often stymied by elite interests (Way, 2005).

Moldovan media, such as Ziarul de Gardă, frequently frame access to information issues within the context of political and administrative barriers. Investigative reports highlight how government agencies use vague security concerns and bureaucratic technicalities to obstruct information requests, painting a picture of systemic resistance to transparency (Ziarul de Gardă, 2021). This framing illustrates the practical challenges that legal frameworks alone cannot overcome, emphasizing the need for comprehensive institutional reforms.

### **Free Speech Legislation**

The study's examination of free speech legislation in Georgia and Moldova reveals persistent challenges despite the presence of strong legal protections. Free speech is widely recognized as a cornerstone of democratic societies, essential for the functioning of a free press and the protection of individual rights (Habermas, 1989; Rawls, 1993). However, the findings of this research illustrate that political interference and media ownership concentration continue to undermine these legal protections in both countries.

In Georgia, the legal framework ostensibly supports free speech, but practical realities tell a different story. Reports from Freedom House document the harassment and intimidation of journalists, particularly those critical of the government, highlighting a significant disconnect between legal protections and on-the-ground conditions (Freedom House, 2021). The

concentration of media ownership in the hands of politically connected individuals exacerbates this issue, creating an environment where media independence is compromised.

The Georgian Charter of Journalistic Ethics underscores the importance of protecting journalists and ensuring media independence. Their reports detail numerous instances of threats and harassment against journalists, framing these issues within the broader context of political and economic pressures (Georgian Charter of Journalistic Ethics, 2021). This framing highlights the ongoing challenges faced by journalists and the urgent need for more robust protections and enforcement mechanisms.

In Moldova, the media landscape is similarly constrained by political interference and oligarchic control. Reporters Without Borders reports on the frequent threats and pressures faced by independent journalists, illustrating the hostile environment in which the media operates (RSF, 2022). The CCA's regulatory reports point to the difficulties in ensuring media independence, with political and economic factors often undermining legal protections for free speech (CCA, 2021).

The framing of free speech issues in Moldovan media, such as Ziarul de Gardă, often emphasizes the hostile environment faced by journalists. Reports highlight the legal threats, harassment, and economic pressures that compromise journalistic independence, painting a bleak picture of media freedom in the country (Ziarul de Gardă, 2021). This framing underscores the systemic nature of the challenges to free speech, indicating that legal protections are insufficient without broader political and economic reforms.

## ***6.2 Stakeholder Influence and Framing***

The analysis of stakeholder influence and framing provides deeper insights into how different actors shape the policy debates on media and free speech. Government bodies in both countries frequently frame media policies in terms of national security and public order, justifying restrictions on media freedom as necessary for maintaining stability. This framing is consistent

with literature on the use of security and stability narratives to justify restrictions on civil liberties (Schmitt, 2005).

In Georgia, government statements often emphasize the balance between freedom of expression and national security. For example, the Ministry of Justice frames media policies as essential for safeguarding democratic values while maintaining public order (Ministry of Justice of Georgia, 2021). This framing reflects a broader narrative where stability is prioritized over media freedom, a common theme in semi-democratic contexts.

Similarly, in Moldova, government statements highlight the need to protect national interests and ensure stability. The framing of media policies as necessary for national security is used to justify actions that restrict media freedom, such as controlling media ownership and limiting access to information (Government of Moldova, 2021). This narrative aligns with the literature on state control in post-Soviet contexts, where national security is often cited to legitimize restrictions on civil liberties (Lewis, 2016).

In contrast, civil society organizations and independent media frame the issues in terms of democratic rights and accountability. Reports from Transparency International Georgia argue that access to information and media freedom are fundamental for ensuring government accountability and fostering an informed citizenry (Transparency International Georgia, 2020). This framing emphasizes the role of media and access to information in promoting transparency and democratic governance.

In Moldova, civil society organizations like the Independent Journalism Center highlight the threats faced by journalists and the obstacles to accessing public information. Their reports frame these issues within the broader context of democratic governance and the need for stronger protections (Independent Journalism Center of Moldova, 2021). This narrative aligns with the broader literature on the role of civil society in promoting transparency and accountability in semi-democratic contexts (Carothers, 1999).

International organizations also play a crucial role in shaping the policy debates on media and free speech. Freedom House reports emphasize the importance of enforcing legal protections and safeguarding journalists from political and economic pressures (Freedom House, 2021). Reporters

Without Borders similarly highlights the need for effective enforcement of media freedom laws and the protection of journalists (RSF, 2022). These external perspectives underscore the gap between legal frameworks and practical realities, emphasizing the need for stronger enforcement mechanisms.

The framing of media freedom and access to information by international organizations aligns with the broader discourse on human rights and democratic governance. By highlighting the discrepancies between legal provisions and practical implementation, these organizations advocate for comprehensive reforms that go beyond legal protections to address underlying political and economic challenges.

### **6.3 Policy Windows and Convergence**

The identification of policy windows and the analysis of the convergence of the problem, policy, and politics streams provide valuable insights into the opportunities and challenges for policy change in Georgia and Moldova. The concept of policy windows, as articulated by Kingdon (1984), highlights the importance of timing and political context in achieving significant reforms.

In Georgia, the Rose Revolution created a temporary policy window that enabled substantial media reforms. During this period, the problem stream included widespread public dissatisfaction with government corruption and lack of transparency. The policy stream involved the introduction of legal frameworks aimed at enhancing media freedom and access to information, such as the Freedom of Information Act. The politics stream was characterized by a shift in political power and a commitment to democratic reforms, creating an opportunity for significant policy changes.

However, subsequent political developments have closed this policy window, leading to stagnation in media reforms. The politics stream has shifted, with political elites prioritizing control and stability over media freedom and transparency. This shift has undermined the enforcement of legal protections and allowed political and economic pressures to continue affecting media operations. Reports from the post-revolutionary period highlight this dynamic, noting the initial optimism and subsequent challenges in sustaining democratic reforms (Transparency International Georgia, 2005).

In Moldova, political instability and the influence of oligarchs have prevented the opening of a similar policy window for significant media reforms. The problem stream includes widespread corruption, political interference, and media ownership concentration by oligarchs. The policy stream involves legal frameworks aimed at promoting media freedom and access to information, but these laws are frequently undermined by political and economic pressures. The politics stream is characterized by the entrenched influence of political elites and oligarchs who obstruct reforms and prioritize their interests over media freedom and public transparency.

Despite ongoing efforts by civil society and international actors to push for reforms, the lack of a favorable political climate has prevented the opening of a policy window for significant changes. The entrenched influence of oligarchs and ongoing political instability continue to undermine efforts to enhance media freedom and access to information. Reports from the Independent Journalism Center of Moldova consistently highlight these challenges, framing the lack of political will and the influence of oligarchs as significant barriers to reform (Independent Journalism Center of Moldova, 2021).

#### **6.4 New Understanding and Insights**

This research contributes to a new understanding of the complexities involved in media and free speech policy formulation in semi-democratic contexts. By applying Kingdon's Multiple Streams Framework, the study reveals how the convergence of different streams shapes policy outcomes and highlights the critical role of political dynamics in influencing these processes.

One of the key insights that emerged from this research is the significant impact of political interference and bureaucratic barriers on the implementation of access to information laws. While legal frameworks are essential, their effectiveness is contingent on the political and administrative context in which they are implemented. This finding emphasizes the need for robust enforcement

mechanisms and political commitment to ensure that legal protections translate into practical realities.

Another important insight is the persistent challenge of media ownership concentration and political pressures on free speech. Despite comprehensive legal protections, the concentration of media ownership in the hands of a few individuals or entities with close ties to political elites undermines media independence and stifles free expression. This finding underscores the need for regulatory measures to address media ownership concentration and protect journalists from harassment and intimidation.

The study also highlights the critical role of civil society organizations and international actors in advocating for media freedom and access to information. These actors provide essential support for journalists and promote democratic norms and values, but their efforts are often constrained by the broader political and social context. This finding points to the importance of strengthening the capacity of civil society organizations and fostering international cooperation to support media independence and transparency.

Finally, the identification of policy windows and the analysis of the convergence of different streams provide valuable insights into the opportunities and challenges for policy change. The dynamic nature of policy windows highlights the importance of timing and political context in achieving meaningful reforms. This finding underscores the need for sustained political commitment and strategic advocacy to capitalize on opportunities for policy change.

In summary, this research enhances the understanding of media and free speech policy formulation in Georgia and Moldova by providing a comprehensive analysis of the factors influencing these processes. The findings highlight the significant challenges posed by political interference, media ownership concentration, and bureaucratic barriers, while also identifying opportunities for reform through the convergence of different streams. These insights are crucial for policymakers, civil society organizations, and international actors working to promote media freedom and access to information in semi-democratic contexts.

## 7. Conclusion

This research provides a comprehensive analysis of the media and free speech policy frameworks in Georgia and Moldova, focusing on freedom of access to information and free speech legislation. By employing Kingdon's Multiple Streams Framework, the study illuminates the intricate dynamics that influence policy formulation and implementation in these semi-democratic contexts.

The findings reveal that, despite robust legal frameworks, the practical implementation of access to information and free speech protections is significantly hindered by political interference, bureaucratic barriers, and media ownership concentration. In Georgia, the initial optimism following the Rose Revolution and the introduction of the Freedom of Information Act has been tempered by ongoing political pressures and administrative hurdles. Similarly, in Moldova, the entrenched influence of political elites and oligarchs, coupled with political instability, obstructs effective transparency and media freedom.

The analysis underscores the critical role of various stakeholders, including government bodies, civil society organizations, and international actors, in shaping the policy debates on media and free speech. Government narratives often justify restrictions on media freedom in the name of national security and public order, while civil society organizations and international actors advocate for media independence and democratic accountability. This dichotomy reflects the broader struggle between maintaining control and promoting democratic values.

The study also highlights the importance of policy windows for enabling significant reforms. In Georgia, the Rose Revolution created a temporary policy window that allowed for substantial media reforms, although this momentum has since waned due to shifting political dynamics. In Moldova, the lack of a conducive political environment has prevented the opening of a similar policy window, despite ongoing advocacy efforts.

One of the key insights from this research is the significant impact of political and administrative contexts on the effectiveness of legal protections. Robust enforcement mechanisms and political commitment are essential to translate legal frameworks into practical realities. Additionally,



addressing media ownership concentration and protecting journalists from harassment and intimidation are critical for ensuring genuine media independence and free expression.

The study further emphasizes the vital role of civil society organizations and international actors in promoting media freedom and access to information. Strengthening the capacity of these actors and fostering international cooperation are crucial steps toward supporting media independence and transparency in semi-democratic contexts.

While this research provides valuable insights into the media and free speech policy landscapes in Georgia and Moldova, it also highlights the need for further study. The dynamic nature of media policies and the evolving political contexts in these countries suggest that ongoing research is necessary to monitor developments and identify new challenges and opportunities. Future research could explore additional factors influencing media policies, such as technological advancements and the role of social media, to provide a more comprehensive understanding of these complex issues.

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## **Appendix: Taguette Database for Data Analysis**

### **A. Legislative Documents**

#### **Georgia**

##### **1. Law on Freedom of Information (2004)**

- Quote: "Every citizen has the right to request and receive public information, regardless of the purpose of the request."
- Highlight: Challenges in implementation.
- Source: Parliament of Georgia (2004).

##### **2. Law on Freedom of Speech and Expression (2004)**

- Quote: "Everyone has the right to freely receive and impart information and ideas through any media, regardless of frontiers."
- Highlight: Legal protections vs. practical challenges.
- Source: Parliament of Georgia (2004).

#### **Moldova**

##### **1. Law on Access to Information (2010)**

- Quote: "Public authorities are obliged to provide access to information of public interest, except in cases expressly stipulated by law."
- Highlight: Political interference.
- Source: Parliament of Moldova (2010).

##### **2. Law on Freedom of Expression (2010)**

- Quote: "The right to freedom of expression includes freedom to seek, receive and impart information and ideas of all kinds."
- Highlight: Media ownership by oligarchs.
- Source: Parliament of Moldova (2010).

### **B. Policy Papers and Reports**

#### **International Organizations**

##### **1. Freedom House (2021)**

- Quote: "While the legal framework in Georgia ostensibly supports free speech, in practice, journalists often face harassment and intimidation, particularly those critical of the government."
- Highlight: Gap between legal protections and practical realities.
- Source: Freedom House (2021).

## **2. Reporters Without Borders (2022)**

- Quote: "The media landscape in Moldova is heavily influenced by political interests, with independent journalists facing frequent threats and pressure."
- Highlight: Political interference.
- Source: RSF (2022).

## **Local NGOs**

### **1. Transparency International Georgia (2020)**

- Quote: "Despite legal guarantees, citizens frequently encounter obstacles when seeking information from public authorities, with many requests being ignored or inadequately addressed."
- Highlight: Bureaucratic barriers.
- Source: Transparency International Georgia (2020).

### **2. Independent Journalism Center of Moldova (2021)**

- Quote: "Despite the legal framework, access to public information is often obstructed by bureaucratic inertia and political interests, with many requests being unjustifiably denied or delayed."
- Highlight: Administrative barriers.
- Source: Independent Journalism Center of Moldova (2021).

## **C. Government and Regulatory Body Publications**

### **Georgian National Communications Commission (GNCC)**

#### **1. GNCC Annual Report (2021)**

- Quote: "While strides have been made in enhancing transparency, there remains a significant gap between policy and practice, largely due to political and administrative constraints."
- Highlight: Inconsistent enforcement.
- Source: GNCC (2021).

### **Coordinating Council of Audiovisual (CCA) in Moldova**

#### **1. CCA Annual Report (2021)**

- Quote: "Efforts to improve access to information are frequently undermined by political dynamics and insufficient enforcement mechanisms."
- Highlight: Political interference.
- Source: CCA (2021).

## **D. Media Articles and Editorials**

### **Georgia**

#### **1. Civil.ge (2021)**

- Quote: "Requests for information are often met with bureaucratic delays or outright refusals, particularly when the information sought is politically sensitive."
- Highlight: Bureaucratic delays.
- Source: Civil.ge (2021).

#### **2. Civil.ge (2021)**

- Quote: "Ensuring a diverse and independent media landscape remains a critical challenge, with continued political and economic pressures affecting media operations."
- Highlight: Media independence.
- Source: Civil.ge (2021).

### **Moldova**

#### **1. Ziarul de Gardă (2021)**

- Quote: "Government agencies frequently cite vague security concerns or bureaucratic technicalities to deny information requests, reflecting a broader culture of opacity."
- Highlight: Bureaucratic technicalities.
- Source: Ziarul de Gardă (2021).

#### **2. Ziarul de Gardă (2021)**

- Quote: "Journalists in Moldova operate in a hostile environment, facing legal threats, harassment, and economic pressures that compromise their independence."
- Highlight: Hostile environment.
- Source: Ziarul de Gardă (2021).

## **E. Stakeholder Statements**

### **Government Bodies**

**1. Ministry of Justice of Georgia (2021)**

- Quote: "The balance between freedom of expression and national security is essential for maintaining public order and safeguarding democratic values."
- Highlight: National security.
- Source: Ministry of Justice of Georgia (2021).

**2. Government of Moldova (2021)**

- Quote: "Protect national interests and ensure stability."
- Highlight: National interests.
- Source: Government of Moldova (2021).
- 

**Civil Society Organizations**

**1. Transparency International Georgia (2020)**

- Quote: "Access to information and media freedom are fundamental to ensuring government accountability and fostering an informed citizenry."
- Highlight: Government accountability.
- Source: Transparency International Georgia (2020).

**2. Independent Journalism Center of Moldova (2021)**

- Quote: "Protecting journalists and ensuring free access to information are crucial for the health of our democracy."
- Highlight: Protecting journalists.
- Source: Independent Journalism Center of Moldova (2021).