TUNISIA MEDIA LANDSCAPE ASSESSMENT

2024

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TABLE OF CONTENTS

USAID: United States Agency for International Development

PTP: Political Transitions Project

MLA: Media Landscape Asessment

IRI: **IRI**: International Republican Institute

HAICA: The Independent High Authority for Audiovisual

ISIE: Independent High Authority for Elections

NGO: Non-Governmental Organization

ATDCE: Association Tunisienne de Développement de la Culture Électronique

SNJT: Syndicat National des journalistes Tunisiens

HAICA: Haute Autorité Indépendante de la Communication Audiovisuelle

IRI: International Republican Institute

RUTMA: Réseau Union tunisienne des médias associatifs

PAMT: Programme d'Appui aux Médias en Tunisie

CIT: Communication Infrastructure theory

C**PM**:   Cost per Mile

CMLP: Civic Media Literacy practices

FM: Frequency Modulation

UTICA: Union Tunisienne de l'Industrie, du Commerce et de l'Artisanat

CONECT   Confédération des Entreprises Citoyennes de Tunisie

EXECUTIVE SUMMARY

Summary of Key Findings

The state of media freedom

In 2023, Tunisia's media landscape faced significant challenges, prominently shaped by the implementation of decree-law No. 54 of 2022. Ostensibly aimed at curbing hate speech and disinformation, and characterised by its ambiguous and broad terms, has had a profound impact on freedom of expression in the country. It has instilled a pervasive atmosphere of fear and uncertainty among journalists, activists, and citizens. The ramifications are multifaceted, leading to increased self-censorship, strategic adaptations by media outlets, and a notable rise in state surveillance. Emblematic cases, such as the arrest of a prominent radio director, reflect a broader trend of governmental efforts to restrict press freedom and control public discourse. These developments have not only curtailed the freedom of the press but also contributed to a disturbing shift in public opinion towards more authoritarian views on liberties and individual freedoms. The situation highlights the precarious and deteriorating state of media freedom in Tunisia, where government actions have significantly stifled dissent and critical journalism.

A new context for political participation

Since the political upheaval of July 25th, 2021, Tunisia's political landscape has undergone significant transformations, affecting how citizens engage in politics. The adoption of the 2022 constitution and changes in institutional frameworks have altered the nature and significance of conventional political participation methods, including elections, protests, and other forms of engagement.

The credibility of the political process and its viability for political representation have been questioned, especially by the opposition. New electoral laws have reshaped the electoral landscape, favoring locally influential individuals over political parties. This has led to a strategic self-exclusion from elections by most opposition parties, who view participation under current conditions as legitimizing a repressive and undemocratic system.

Low voter turnout in recent elections reflects public disengagement, raising questions about the effectiveness of the electoral system without opposition participation. Increasing abstentionism, characterized by low voter turnout and disengagement from party politics, is not solely due to a lack of awareness but also reflects a deeper disillusionment with the political class.

Fostering political participation in Tunisia is challenging due to speech restrictions and the risk of persecution under laws against misinformation. International aid must be cautious, balancing support for media development with the safety of those involved. Programs must foster dialogue and trust, navigating the delicate situation where promoting open political expression can lead to legal jeopardy. Understanding these dynamics is key for aiding Tunisia's political engagement and media landscape.

Media landscape, consumption habits, and trust in the media

The Tunisian media landscape is marked by a diverse array of platforms, each with unique challenges and influences. The print press, historically a mix of state-owned and independent publications, faces a dramatic decline, particularly in advertising revenue, and struggles to compete with digital media. Television, featuring both public and private channels, is experiencing a shift in viewership patterns, with a trend towards digital platform consumption, particularly among younger audiences. Public television, especially Watania 1, remains a major source for political information, although its content is criticized for being limited in variety and avoiding contentious topics.

Radio in Tunisia presents a varied landscape with public, private, and associative radios. Public radios continue to be a non-negligible source of news and cultural content, while private radios, led by stations like Mosaique FM, dominate in terms of reach. Associative radios, with a focus on community-level broadcasting, play a crucial role in catering to specific local interests.

Digital and alternative media are growing and diversifying, reflecting a broader shift toward digital platforms. This sector includes a range of platforms such as podcasts, YouTube channels, and social media influencers, offering a variety of content that caters to different interests and demographics. These platforms are characterised by their innovative approaches and their ability to reach specific audience segments effectively.

The economic challenge

In Tunisia, the economic challenges facing legacy media, associative radios, and digital media are distinct yet interconnected. Legacy media, including traditional print, television, and radio, confront significant financial hardships, particularly from a dwindling advertising market. This decline is attributed to shrinking advertising budgets and competition from digital platforms, impacting even the economically viable private radios.

Associative radios face unique economic hurdles. Operating in digitised media environments, these radios struggle to capture a share of the advertising market due to their hyper-local nature and regulatory constraints, which limit their advertising revenue and audience reach. The lack of comprehensive audience measurement data further complicates their ability to attract advertisers. Some have adapted by focusing on local advertisers aligned with their community-oriented mission, but overall, they grapple with financial sustainability.

Alternative digital media in Tunisia are increasingly influential, leveraging the shift towards digital consumption. They offer innovative advertising solutions like native ads and are adept at addressing market segmentation. Digital platforms can provide robust engagement data, making them attractive to advertisers.

The absence of public funding and threats to foreign funding pose critical challenges. Associative radios, reliant on foreign funds due to limited local public funding, are particularly vulnerable to these changes. The potential ban on foreign funding could significantly impact not only associative radios but also digital media, forcing them to consider alternative economic models or geographic expansion for sustainability.

Mis- and disinformation and polarisation

In Tunisia, disinformation dynamics involve both domestic and foreign sources. Political motivations drive much of the domestic disinformation, with political parties using troll farms and social media for smear campaigns. Foreign influence, particularly from regional actors, manipulates narratives to align with their geopolitical interests. This disinformation is amplified by existing social and political polarisation, reinforcing echo chambers and making audiences more susceptible to misinformation that aligns with their beliefs.

Fact-checking initiatives have emerged as a response to this growing challenge. These initiatives, led by various organizations, aim to verify information and foster critical thinking. However, they face limitations, such as reaching the same audiences as the misinformation and combating deeply ingrained beliefs that favor misinformation.

Addressing these challenges requires a dynamic approach to media literacy. Civic Media Literacy and Practice (CMLP) offers a model for this, focusing on audience participation, inclusivity, and fostering empathy for different viewpoints. This approach aims to break down echo chambers and promote a more nuanced understanding of issues, countering the divisiveness fueled by misinformation and polarisation.

Moving Froward

Building on these findings, recommended actions are divided into nine distinct but mutually-reinforcing line of efforts.

Economic Viability

- Address the economic challenges facing associative and alternative media.
- Implement a media accelerator program to guide media outlets in discovering innovative economic models.
- Provide direct financial support to associative radios to cover high costs and facilitate their transition to sustainable models.

Legal Challenges

- Offer comprehensive legal education and resources for media actors.
- Establish a network of legal experts for pro bono services to media professionals.
- Focus on training and practical guidance on current media laws.

Media Literacy

- Shift from static media literacy approaches such as fact-checking and awareness campaigns towards Civic Media Literacy and Practice approaches.
- Encourage participatory content creation and dialogue between media and the public.
- Promote critical engagement with media content.

Continued Support for Associative Radios

- Associative radios play a crucial role in delivering hyper-local news in underserved regions and enhancing political participation, especially in Tunisia's reconfigured political system.
- These radios are vital for community cohesion and local storytelling.
- Challenges include adapting to digital media trends and engaging youth.

Modernising Associative Radios

- Encourage a shift from conventional broadcasting models to a more community-focused approach.
- Focus on participatory models and audience-centric approaches.
- Balance the appeal to both older and younger generations, with an emphasis on digitisation and social media engagement for youth.

Fostering Innovation in Alternative Media

- Expand donor support to include alternative digital media.
- Launch a media incubation programme to nurture civic-minded alternative media ventures.
- Focus on empowering marginalised youth and fostering non-conventional content.

Improved Representation for Alternative Media Actors

- Enhance policy representation for alternative media actors and content creators.
- Consider establishing a new representative body or leveraging existing business and entrepreneur associations.

Donor Visibility

- Reconsider high-visibility branding requirements for partners to reduce their vulnerability.
- Maintain transparent communication about funding to preserve public trust.

Research

- Conduct further research to generate a more granular understanding of media consumption habits, mis/disinformation dynamics, polarisation dynamics, and the economic opportunities for digital media and the creative economy sector.

INTRODUCTION

Introduction

In recent times, Tunisia's media landscape underwent substantial shifts, necessitating a re-examination of established understandings and narratives about the media ecosystem. Internews, having previously completed a Media Landscape Assessment (MLA) for Tunisia in July 2021, has identified an urgent need for a revisit. The backdrop of this renewed assessment is a series of considerable changes: the introduction of a more restrictive regulatory framework, heightened tensions between the media and the authorities, and a rapidly evolving social media landscape. These shifts have undoubtedly cast ripples across the dynamics of media freedom, access to information, freedom of expression and, generally, the health of the information ecosystem in Tunisia.

While the 2021 MLA was comprehensive in its scope and insights at the time, the fluidity of the media environment means that it may not fully reflect the present state of the Tunisian information ecosystem. Emerging social media trends, coupled with shifting public perceptions of key political actors and institutions, have added layers of complexity that warrant a thorough re-assessment. The urgency of updating the MLA was not merely academic. The findings and insights from this renewed assessment will be instrumental to informing not only an ongoing Internews project seeking to bolster public trust and foster inclusive participation in Tunisia's political process, but also Internews' longer-term media development goals in Tunisia and cooperation with other stakeholders involved in the media reform agenda.

The overall aim of this updated MLA is to provide an renewed, holistic analysis that captures the current challenges and opportunities in Tunisia's media landscape, ensuring that Internews and its partners are equipped with a precise and up-to-date understanding as they navigate the intricate terrain of media and politics in the country.

BACKGROUND AND CONTEXT ANALYSIS

Navigating the Turbulent Waves of Tunisia's Media Landscape: A Post-July 25th, 2021 Analysis

The Tunisian media landscape, once hailed as a beacon of freedom and diversity in the Arab world, has undergone a tumultuous transformation since the seismic events of July 2021 ,25. The nation, grappling with economic challenges and political gridlock, found itself at a crossroads. In a televised address, President Kais Saied announced a series of dramatic measures intended to address the crisis. Saied invoked a state of emergency, suspending the work of parliament and dismissing the Prime Minister and his cabinet. These actions generated significant reactions, both domestically and internationally. Supporters, weary of political impasse, viewed the move as a necessary intervention to combat corruption and inefficiency [1]. Critics, however, expressed concern about the potential erosion of democratic principles and the curtailment of civil liberties.

In the immediate aftermath, a stark silence descended upon the usually vibrant halls of parliament. Saied, exercising the powers granted under the state of emergency, ruled unilaterally through decrees. As days turned into weeks, the question of Tunisia›s trajectory loomed large. Would the nation navigate this turbulent period and retain its fragile democratic footing? Or would the recent measures pave the way for a consolidation of power and a shift towards authoritarianism?

The 25th of July 2021 marked a signifcant turning point in Tunisia›s recent history. While its long-term implications remain uncertain, the day undoubtedly left an indelible mark on the nation›s political landscape, leaving both hope and apprehension in its wake [2]. This pivotal date marked a significant shift in the country›s political trajectory, as President Kais Saied suspended parliament, dismissed the prime minister, and assumed sweeping executive powers. The repercussions of this decision extended far beyond the political realm, profoundly impacting the media ecosystem that had long been a cornerstone of Tunisia›s democratic aspirations.

During this period, %79 of the programmes and news bulletins of the country's six main TV and radio channels included «positions favourable to presidential decisions», says a report by the HAICA [3] (High Independent Authority for Audiovisual Communication) published in September 2023. A figure that illustrates the lack of objectivity and pluralism of the most watched and listened to channels.

[1] https://www.arab-reform.net/publication/tunisian-society-finds-itself-stuck-in-silence-and-limbo-post-july-25/
[2] https://carnegieendowment.org/sada/region/664
[3] https://larevuedesmedias.ina.fr/tunisie-medias-independants-presse-nawaat-inkyfada-alqatiba

Social Factors: A Thirst for Information and Diverse Perspectives

The Tunisian public, particularly in the aftermath of July 25th, 2021, has demonstrated an insatiable demand for accurate, unbiased information. The political and economic uncertainties that engulfed the nation fueled a yearning for credible sources that could shed light on a rapidly evolving situation. This demand has propelled the rise of independent and alternative media outlets after 2011 catering to a population eager for perspectives beyond the traditional mainstream narratives. To cite a few of them like inkyfada, Inhiyez or Qlm.

The proliferation of social media platforms has further intensified this desire for diverse viewpoints. Tunisians have turned to social media as a primary source of news and information, giving rise to a new generation of online journalists and influencers who shape public discourse. These online voices have democratised the media landscape, providing a platform for marginalised groups and underrepresented perspectives. «We must not forget that today, the biggest Tunisian media are Facebook pages,» said Ahmed Amine Azouzi, recalling that the one of Radio Mosaique FM has close to 5.7 million likes.Tunisia
was home to 7.12 million social media users in January 2024, equating to 56.9 percent of the total population. A total of 16.48 million cellular mobile connections were active in Tunisia in early 2023, with this fgure equivalent to 132.9 percent of the total population.

9.96

million internet users in Tunisia at the start of 2024

56.9 %

of the total population of Tunisa are is using social media

Political Factors: A Tightening Grip on Media Freedom

Despite the Tunisian public's yearning for an open and unfettered media environment, the government's actions since July 25th, 2021, have painted a contrasting picture. The crackdown on media freedom has been a source of deep concern, with authorities shutting down TV stations, blocking websites, and arresting journalists as it was the case of Yassine Romdhani, a journalist for radio station Sabra FM, detained from October 3 to December 1, 2023 and charged by an investigative judge in the Kairouan First Instance Court for an August Facebook post criticizing the former minister of interior Charfeddine, based on a complaint by the latter. Romdhani is provisionally free pending his trial, his lawyer Magda Mastour told Human Rights Watch [1]. These measures have created an atmosphere of fear and self-censorship, stifling critical reporting and hindering the free flow of information, "Saied and his government could have issued this legislation to make cyberspace and its users safer, but instead, they instrumentalized Decree-Law 54 to curb Tunisians' rights," Human Rights Watch Director in Tunisia Salsabil Chellali said. "Under such a decree, no critic of the authorities can feel safe."

The Tunisian media landscape has become increasingly polarised, with outlets aligning themselves with opposing political factions. This polarisation has exacerbated the challenges faced by the public in finding objective and impartial reporting, further eroding trust in traditional media institutions.
The media's role as a watchdog and a pillar of democracy has been undermined, with many outlets perceived as mouthpieces for specific political agendas.

Economic Factors: A Struggle for Survival in a Changing Landscape

The Tunisian media industry is grappling with a multitude of financial challenges, including a decline in advertising revenue and government subsidies. These economic pressures have made it difficult for media outlets to maintain their independence and produce high-quality content. The dwindling financial resources have forced many outlets to resort to sensationalism and clickbait journalism, further eroding public trust in the media.

The rise of digital media has compounded the economic woes of traditional media outlets. The shift towards online consumption patterns has led to a decline in traditional media consumption, such as print newspapers and television. This has created a challenging environment for media outlets to adapt to the evolving digital landscape and monetize their content effectively.

[1] https://www.hrw.org/news/2023/12/19/tunisia-cybercrime-decree-used-against-critics

Demographic Factors: A Young and Tech-Savvy Audience

Tunisia›s young and tech-savvy population has embraced digital media, becoming a primary target audience for news and information as illustrated by the below image. This demographic shift has presented opportunities for new media outlets to reach new audiences and provide content tailored to their preferences. The rise of online platforms has democratised access to information, empowering a generation of digitally connected Tunisians to engage with the media landscape in unprecedented ways.
The growing demand for multilingual content has also emerged as a significant demographic factor. Tunisia's diverse population has a growing need for news and information in multiple languages, particularly Arabic and French. This demand has driven media outlets to expand their linguistic reach, catering to the diverse linguistic landscape of the country.

Institutional Factors: A Weak Regulatory Framework and Lack of Transparency

The Tunisian media sector operates under a weak and outdated regulatory framework, lacking the necessary mechanisms to effectively enforce media freedom and protect journalists from abuse.
Referring to the analysis of the 2021 Internews MLA [1] , Since 2011 the constitutional and institutional
framework have been put in place in Tunisia (namely Decrees 115 and 116, November 2011) to recognize the formation of a private media sector. However, a decade later the regulatory framework of the media sector in Tunisia is still showing signs of instability and inconsistencies which need to be addressed. Decree 115 on the Freedom of Press, Printing and Publishing was adopted by Tunisia's interim government to supersede the 1975 Press code, which imposed several restrictions on journalists' right to free expression.

In particular Article 11 in Decree 115 exists to protect journalistic sources and Article 37 extends to journalists the protection of their professional secrecy. However, the definition of journalists in Decree 115 is restrictive and limits the rights granted under the Decree to those who have obtained a bachelor's de-gree or an equivalent diploma and to have journalism as a regular and main activity andmain source of income (Article 7). These restrictions therefore exclude other information producerssuch as bloggers, online content creators, citizen journalists and some community radios.

Decree 116 allows for the licensing of private media. The Independent Supreme Authority for Audiovisual Communications (HAICA) is the independent body set up to organise and regulate this emerging sector. The creation and operation of private audio-visual enterprises require a license and compliance with certain terms and conditions. Even though HAICA is a key entity body regulating various television and radio channels, with increased focus on monitoring pluralism around elections time, it remains under-resourced in comparison to the volume of content and programming broadcast.

Decrees 115 and 116 have also acknowledged freedom of the press by allowing any private citizen or legal entity to set up a newspaper or periodical and by setting mechanisms to regulate pluralism and transparency. Freedom of the electronic press and the right to publish online, although exercised in full following the revolution, is not expressly provided for in the current law and remains unprotected.

This regulatory vacuum has created an environment where media outlets can operate with impunity, potentially engaging in unethical practices and compromising the integrity of journalism.

Transparency remains a critical issue in the Tunisian media sector, particularly with regard to the ownership and financing of media outlets. The lack of transparency has hindered accountability and raised concerns about potential conflicts of interest and undue influence on media reporting. This opaque environment has fueled public mistrust and scepticism towards the media.

[1] https://internews.org/wp-content/uploads/2023/05/Internews_Tunisia_Media-Landscape-Assessment_July2021.pdf

RESEARCH PURPOSE, SCOPE AND METHODOLOGY

MLA Purpose and Scope

The primary aim of the research is to provide an updated and holistic view of the Tunisian information ecosystem, with a particular focus on the dynamics of media freedom, the evolving relationship between media entities and the authorities, and the role of both traditional and digital media platforms in shaping public discourse.
While the foundation of this update is based on the MLA completed in July 2021, the present research prioritises developments that have occurred post–July 2021, ensuring that the assessment captures the most recent and relevant trends.

Thematic areas

To ensure a comprehensive yet focused approach to the Media Landscape Assessment update, a thematic scope covering several broad thematic areas was delineated. These themes are designed to capture the essence and the breadth of the specified scope while providing a structured framework for our inquiry. Each thematic area was then distilled into specific research questions designed to guide data collection and analysis efforts and the design of data collection tools.

Regulatory Framework and Media Freedom

• How has the regulatory framework governing media in Tunisia changed since the 2021 MLA?
• In what ways have these regulatory shifts impacted media freedom and freedom of expression?
• Are there specific regulations or policies that have been particularly contentious or influential?
• What specific events or issues have heightened tensions between media entities and authorities since the 2021 MLA?
• How have these tensions manifested in terms of journalistic practice, media coverage, and public perceptions?
• Are there patterns or commonalities in the types of media outlets or journalists targeted?

Polarisation, Misinformation, and Media Literacy

• How prevalent is polarising content in traditional and alternative media outlets, and what themes or topics tend to be most polarising?
• Are there identifiable patterns or trends in the spread of misinformation across various platforms?
• Which actors or entities are most frequently associated with the dissemination of polarising narratives or misinformation?
• What fault lines are traversing Tunisian society and how are they impacting information flows?
• How do misinformation campaigns leverage polarised sentiments to gain traction or credibility?
• What mechanisms or strategies have been employed by media entities to counteract misinformation and reduce polarisation? How effective have these been?
• Are there any correlations between the rise of misinformation, polarisation, and the levels of trust in news sources?

Emerging Social Media Trends

- What new social media platforms or trends have emerged as influential in Tunisia's media landscape?
- How are these platforms being utilised for political discourse, information dissemination, and public engagement?

Pluralism and Marginalisation

- How well are diverse voices, especially those of marginalised communities, represented in both traditional and alternative media?
- What barriers exist that might hinder the participation or representation of marginalised groups in the media landscape?
- Are there media platforms or outlets that specifically cater to or represent the interests of
- marginalised communities? How effective are they in their outreach and impact?
- How does media content vary in its portrayal of different socio-economic, ethnic, gender, or age groups?
- Are there discernible biases in media content that affect the broader societal narrative and public opinion about marginalised groups?
- What initiatives or strategies have media actors adopted to promote pluralism and reduce marginalisation in their content?
- Are marginalised communities turning to alternative platforms or creating their own media channels to ensure representation? If so, how effective and widespread are these efforts?

Public Perceptions and Trust

- How have public perceptions of key political institutions and actors evolved since the 2021 MLA?
- Which information sources are most trusted by the Tunisian public, and has this trust shifted?
- Are here demographic or regional or gender-based variations in trust and media consumption patterns?
- What are the drivers of trust and mistrust in media?

Opportunities in the Current Media Landscape

- Despite the challenges, what opportunities exist for media outlets, journalists, and civil society in the current environment?
- Are there avenues for collaboration, capacity-building, or advocacy that can strengthen media freedom and resilience?

Methodology

The methodology of the Tunisia Media Landscape Assessment (MLA) relied on a mixed methods approach, primarily focusing on qualitative data and drawing from pre-existing data to gain in-depth insights into the media landscape but also in response to time and resource constraints which did not enable the collection of large amounts of new quantitative data. This approach allowed for a nuanced understanding of the complexities and dynamics within the Tunisian media sector.

Literature review

An extensive review of existing literature was conducted to contextualise the findings and to understand the historical and current state of the media landscape in Tunisia. This review encompassed academic research, international reports, and other relevant publications, providing a solid foundation for the assessment and ensuring that the analysis was grounded in a comprehensive understanding of the existing knowledge and discourse on the subject.

Quantitative data

The MLA leveraged quantitative data from third-party sources like the Arab Barometer and DataReportal. This data provided a broader understanding of media consumption trends. Primary quantitative data was collected through a collaboration with the International Republican Institute (IRI). This involved the inclusion of tailored questions in the National Survey of Tunisia conducted between August and September 2023, focusing specifically on media consumption and trust in media sources for political information. This primary data collection was crucial in providing current, specific, and relevant insights into the Tunisian media landscape.

Qualitative data

A focus group was conducted with 9 journalists from associative radios engaged in a partnership with Internews. This method provided a platform for in-depth discussions, allowing for a deeper exploration of the experiences, perceptions, and challenges faced by journalists working in this sector. The MLA also included 8 key informant interviews, using a purposive sampling strategy to target key stakeholders in the media landscape. Interviewees represented a wide range of perspectives, including legacy media, digital media, investigative and explicative journalism, citizen journalism, the creative economy, unions, regulators, and fact-checking organizations. The purposive sampling ensured that the voices of diverse stakeholders were heard, particularly emphasising digital media to capture the variety of media outlets and approaches in Tunisia.

Risks, Limitations, and Mitigation Measures

Scope and Depth

The research was conducted in a period of four weeks in November 2023. Given the constraints of time and resources, this research primarily relied on pre-existing proprietary and third-party data, key informant interviews and a focus group discussion with a specific subset of the media landscape.
While these methods provide valuable insights, they may not capture the full breadth and depth of the evolving media environment in Tunisia. As such, certain nuances, emerging trends, or less-visible dynamics might be overlooked. The resources dedicated to this study may leave certain gaps in information unelucidated.

Representativeness of primary sources

The proposed focus group with Internews' community radio partners offers a unique perspective from a niche subset within the media landscape. Primary data collected by Internews on media actors also focuses on its current partners. However, it's important to note that the insights derived from this group may not be generalisable to the broader Tunisian media landscape. The perspectives of this particular segment, while invaluable, represent a specific slice of the wider ecosystem.

Reliance on pre-existing data

The initial stages of research heavily depend on the review of Internews' proprietary data and existing literature. While these sources (Annex 3) provide valuable knowledge, gaps or biases in the original data collection can inadvertently shape our understanding and conclusions or leave key grey areas unelucidated.

Subjectivity and bias

Interviews and focus group discussions, while rich in qualitative data, inherently reflect subjectivities. The views expressed by participants are influenced by their personal experiences, biases, and positions within the media ecosystem. As researchers, The consultants team must be cautious not to generalise individual opinions as representative of broader groups or to interpret them without considering potential biases.

Blind spots

Key gaps resulting from the above-mentioned limitations include:

Demand side data/media consumption habits: The collection of primary data focused on the "supply side" of the information ecosystem as "demand side" research would have necessitated unavailable resources. This gap was partly mitigated by relying as much as possible on pre-existing data generated by third parties (e.g. IRI, the Arab Barometer). Nonetheless, in the absence of comprehensive and up-to-date primary data on Tunisian media consumption habits and media consumers' expectations, this MLA could not provide a thorough analysis of the demand side and was primarily built around the perspective of media producers rather than consumers.

Media representation: Up-to-date data on the quality of the representation of women and marginalised groups is also unavailable, the last comprehensive study of this subject having been published in 2020 [1].

Misinformation and hate speech: While the topics of mis- and disinformation and hate speech was explored through a literature review and by addressing it during interviews with experts and practitioners, including leaders of fact-checking organisations, the research was constrained to rely primarily on anecdotal data in the absence of comprehensive data sets. Ideally, this gap should be addressed in the future by conducting a thorough analysis of mis- and disinformation collected through web scraping to produce an accurate and detailed mapping of sources of disinformation and hate speech and better understanding of public susceptibility to these phenomena.

• **Polarisation and structure of the networked public sphere**: Polarisation and the structure of the networked public sphere are key drivers of both mis- and disinformation and hate speech. Mapping the different clusters and communities that form the Tunisian digital space, analysing the ways in which they interact, identifying echo chambers and each clusters' trusted media sources is required to reach a robust understanding of not only media consumption habits but also mis- and disinformation dynamics and the expression of political antagonism in the digital space.
However, the last comprehensive mapping of the Tunisian public sphere dates from March 2016 [2] although a partial attempt at reproducing this research was conducted by BuildUp and the British Council in 2021.

[1] Sayah, Habib, Tunisian Youth and the Media: Perspectives on Traditional and Alternative Media, I Watch, December 2020,
[2]Nagazi, Escander, Jazem Halioui, and Fares Mabrouk, "An Accelerated Story of the Emergence and Transformation of the Networked Public Sphere: The Case of Tunisia," Arab Networked Public Sphere, March 2016

FINDINGS

I. The state of media freedom

This section delves into the multifaceted implications of Decree 54, the emblematic case of Mosaïque FM and Boutar's arrest [1], the diverse reactions to the crackdown, and examples of those targeted by the Tunisian authorities.

Decree 54: A Tool for Silencing Dissent

Decree 54, officially known as Decree-Law No. 54-2022, has significantly impacted freedom of expression and press freedom in Tunisia. Adopted by the President of the Republic between dissolution of the 2019 legislature and the election of a new Assembly of the People's Representatives, under the guise of curbing hate speech and disinformation, this decree marks a concerning shift in the Tunisian digital rights landscape.

In addition to expanding state surveillance capabilities, Decree 54 contains provisions that criminalise various forms of speech, including the "creation, promotion, publication, transmission, or preparation" of false news, hate speech, personal data or forged documents. It introduces harsh penalties for these offences, with the possibility of up to five years in prison and up to ten years if the target is a public official. These prosecutions raise legitimate questions about the real purpose behind the adoption of Decree law 54, especially since the crimes stipulated in Article 24 are already criminalized under Decree law No. 115 on freedom of the press.

Decree law 54 contains broad and imprecise terms.
A wide range of acts are criminalized, such as "producing, promoting, publishing, sending, or preparing false news, statements, rumors, or documents that are fabricated, forged, or falsely attributed to others with the aim of infringing on the rights of others, harming public security or national defense, or spreading terror among the population." In this context, it is unclear what constitutes "false news," "false statements," or "false rumors," or what could be interpreted as intended to harm public security or spread terror among the population. The second paragraph of Article 24 also contained the bizarre crime of "inciting hate speech." Does this mean that spreading hate speech without incitement is not criminalized under Tunisian law?

[1] https://www.article19.org/resources/tunisia-director-of-radio-mosaique-fm-must-be-released-immediately/

A product of global trends? [1]

Decree 54 was adopted amid a growing global trend of normalising restrictions on freedom of expression, often justified by the need to combat disinformation and hate speech. While the decree shares some similarities – at least in terms of aims – with legislation such as the UK's Online Safety Bill [2] or Germany's NetzDG [3] , it represents a more extreme approach to controlling content. The worldwide concern over the spread of disinformation and the perceived threat it poses to democratic institutions has created a context where measures like Tunisia's Decree 54 appear less like outliers and more like part of a global response. This makes it increasingly difficult for human rights organisations and opposition groups to argue against Decree 54 as an anomaly compared to global practices.
However, a crucial difference lies in the context of Decree 54's application, which unfolds within an increasingly authoritarian Tunisian context. The government's encroachment on the judiciary, which is part of a broader trend toward centralising power and limiting checks and balances, is likely to strongly shape the application of Decree 54.

The unpredictability of Decree 54's application

The vagueness of Decree 54 exacerbates these concerns. The lack of precise definitions within the law creates an environment of fear and uncertainty among journalists, activists, and ordinary citizens. For Emna Chebaane, Editorial Director of Inkyfada, "it is actually the randomness that scares journalists… you can't anticipate whether you will fall under Decree 54 or not. Whatever you write, if they really want to use Decree 54 against you, then they will". According to an IRI poll conducted in September 2023, only %28 of Tunisians above the age of 18 feel that they "can speak or post content online about politics or politicians without fear of arrest or legal consequences", against %38 in February 2023. Although the respondents were not explicitly questioned about Decree 54, it can be reasonably expected that the climate created by its application has contributed to this sharp drop.

28 %

Tunisians above the age of 18 feel that they "can speak or post content online about politics or politicians without fear of arrest or legal consequences"

-10 %

is the decrease between February 2023 and September 2023

[1] https://www.accessnow.org/a-new-blow-to-freedom-of-expression-in-tunisia/
[2] https://bills.parliament.uk/bills/3137
[3]https://en.wikipedia.org/wiki/Network_Enforcement_Act

Repression under Decree 54: authors and targets

Mehdi Jelassi, former president of the National Syndicate of Journalists of Tunisia (SNJT), the application of Decree 54 is politically-motivated and driven by the executive branch. He notes that "over %90 of cases were initiated by a complaint issued by ministers, that is by the executive branch, through written instructions to the public prosecution service. These instructions follow the same format: they are addressed by the Minister of Justice to the prosecutor, they identify the author of the offence, and the litigious statement, article or interview."

> *The decree 54 did not single out specific topics and didn't draw any red lines... it was not created to address a specific area of discourse but as a "weapon" against anyone who speaks critically.*
>
> Mehdi Jelassi, former president of the National Syndicate of Journalists of Tunisia (SNJT)

The first victim of Decree 54 was the editor of the electronic news site Business News, Nizar Bahloul [1], who was prosecuted for an opinion piece. According to Jelassi, Bahloul didn't make any false accusations against the then Prime Minister Najla Boudin but "simply made a negative assessment of her performance". According to Jelassi, in most cases involving Decree 54, the allegations made by the accused, although prosecuted as disinformation, were factual. He notably cites the example of journalist Mohamed Boughalleb who is currently under investigation following a complaint by the Minister of Religious Affairs. He had accused the minister of misappropriating a citizen's vehicle, an allegation which has been validated by the country's courts.

So far, Decree 54 has been invoked against a wide range of individuals, including not only journalists, but also political leaders, bloggers, activists, lawyers, and even ordinary citizens who expressed criticism of the government on Facebook.

The latest report from Human Rights Watch, dated December 21st, 2023,[2] sheds light on concerning legal actions in Tunisia. On December 11th, the Jendouba First Instance Court convicted 63-year-old Sofiane Zneidi to eight months in prison and a TND 5,000 fine (approximately USD 1630) under Decree 54. Zneidi had been detained since April 18, 2023, following his arrest for Facebook posts supporting Ennahda President Rached Ghannouchi, who was arrested a day earlier. Zneidi's posts, which he later deleted, included criticism of Ghannouchi's arrest and a video of Ghannouchi discussing the risks of marginalising opposition movements.

Zneidi was also initially charged under Article 67 of the Penal Code which prohibits "insulting the President", although his posts did not explicitly name or clearly refer to the president. The video featured Ghannouchi discussing the issues leading to his own detention on April 20, with potential charges that could lead to the death penalty. This example does not only show that Decree 54 is often combined with pre-2011 repressive legislation, but also such legislation is loosely applied by the judiciary.

[1] https://www.icj.org/wp-content/uploads/2023/07/Tunisia-Silencing-Free-Voices-_compressed-1.pdf
[2] https://www.hrw.org/news/2023/12/19/tunisia-cybercrime-decree-used-against-critics

In a separate case, political activist Chaima Issa received a one-year suspended sentence on December 13 by a military court for comments made in a December 2022 radio interview. The charges included two months under Article 24 of Decree-Law 54, six months for «inciting the army to disobey orders,» and four months for «insulting the president.» This trial, initiated by a complaint from former Interior Minister Taoufik Charfeddine, raises concerns about trying a civilian in a military court, a practice contrary to international fair trial standards.

In another example, Mohamed Zantour, a 26-year-old Ennahda supporter, was detained from April 26th to July 21st for Facebook posts criticising President Saied, supporting Ghannouchi, and denouncing police brutality.

More recently, journalist Zied El Heni was detained under Article 24 of Decree 54, which prohibits the dissemination of false information, for having criticised expansive judicial interpretation of Article 67 of the Penal Code. [1]

Does Decree 54 apply to journalists?

SNJT's official position is that Decree 115 of 2011, which governs media freedom, supersedes Decree 54 and offers journalists a protective framework allowing them to evade the application of Decree 54.

The journalists' union has adopted specific protocols for journalists undergoing interrogation by authorities, emphasising that journalists should assert their professional status to ensure that they are pursued under Decree 115 which only allows an investigative judge to conduct interrogations related to press matters, thereby excluding the criminal investigations brigade or counter-terrorism units from such proceedings. It should be noted that although Decree 115 was not as pro-freedom as some argue – it did criminalise the publication of false news for example – it offered a more robust framework with less room for arbitrary application, thanks to more precise definitions of offences and a protective procedural framework that mandated a strong burden of proof.

Jelassi further argues that Decree 15's remit extends beyond just journalists to anyone involved in publishing, writing, or printing, including ordinary citizens and citizen journalists. The only exception to this decree's application, he notes, is when incitement to violence is involved, at which point the criminal code would apply – a stance purportedly upheld by the Cour de Cassation, Tunisia's highest courts of justice. This interpretation suggests that all individuals engaged in publishing, including citizen journalists and even ordinary citizens using social media, have a right to protections afforded by Decree 115, a viewpoint that advocates for a broad application of press freedoms.

However, this characterisation by Jelassi and SNJT faces a critical challenge, as there is no substantial evidence indicating that the judiciary concurs with this interpretation of Decree 115, particularly in light of recent applications of Decree 54. Contrary to the union's viewpoint, the judiciary has not hesitated to prosecute and try journalists under Decree 54.

[1] https://inkyfada.com/fr/2023/07/18/decret-54-opposition-tunisie/

Mosaïque FM radio director arrest : a stark example

In February 2023, Noureddine Boutar, the co-owner and director of Mosaïque FM, a popular radio station, was detained and, according to his lawyer Dalila Ben Mbarek Msaddek, subjected to interrogation regarding the station's editorial line, its choice of columnists, and management practices.

Boutar's arrest has been perceived by many observers as a calculated move to send a chilling message across Tunisia's media landscape. Mosaique FM stands out as the most critical radio station that continues to provide a platform to opposition voices, while also being the most listened to, with an audience of 1.2 million according to Sigma Conseil. This combination of popularity and critical stance makes the radio director's arrest particularly significant. It signalled to many in the media sector that if the government can detain someone as influential as the director of Mosaique FM, then no one in the media industry is beyond reach.

Such high-profile detention sends a clear signal: critical voices, especially those with wide reach and influence, are not exempt from government scrutiny or consequence. The result is a media landscape increasingly deterred from offering dissenting perspectives or engaging in robust criticism of government policies. Some outlets like the privately-owned Hiwar Ettounsi television have largely disengaged from the coverage of political affairs.

A journalist participating in our focus group discussion observed that Boutar's arrest has not only impacted journalists but has also deterred investors from engaging with the media sector, thus impacting the industry's funding:

Since Noureddine Boutar was imprisoned – as he was not only the Director of Mosaique but also a significant investor in that radio – businesspeople have avoided the media sector like the plague. They want to avoid problems, and they have enough problems of their own. They don't want to be more exposed [to political risks] than they already are and they are afraid of bearing the responsibility of anything that might be said on those waves. All radios are facing financial repercussions. Sami Fehri [owner of Hiwar Ettounsi TV] says that he doesn't want to return to prison so he now avoids controversy."

The return of self-censorship and other coping strategies

The testimonies The consultants team collected paint a picture of a media environment that is gravitating toward self-preservation and strategic adaptation in response to Decree 54, with self-censorship and disengagement from overt political critique becoming the norm. While there are outliers who continue to push the boundaries, the prevailing trend suggests a retreat from the kind of overt political commentary that characterised the media landscape in the last decade but might now trigger legal repercussions.

Focus group discussions with community radios reveal a deliberate shift away from political programming out of fear of falling foul of the decree.

> *We have desisted from political programming and we now focus on cultural and sports programmes. We address political issues in an indirect way, but we don't invite politicians anymore.*
>
> Journalist from an associative radio, Male +25 years old

The investigative journalism platform Inkyfada stands as one the outliers. "The intention to silent dissent in Tunisia has instead reinforced our previous position" told us Emna Chebaane before acknowledging the pragmatic fear of journalists who now face the dilemma of whether to attach their names to politically sensitive articles. The option to publish anonymously is increasingly being considered as a safeguard against potential legal consequences.

In the podcasting space, hosts like Nawel Bizid who runs Deep Confessions, have become more circumspect, weighing their words to avoid providing authorities with pretexts for arrest. The experience of witnessing the impact of the director of Mosaique FM's arrest has been instructive for Bizid, a former radio professional. She says she experienced "a push to engage in self-censorship" in the last year, although her podcast deals with mental health rather than political affairs, highlighting growing concern of inadvertently crossing red lines defined by the decree. Bizid has even enlisted a legal advisor because she is "afraid people might misinterpret my words as criticism of the authorities or as fake news or defamation or anything that falls within the scope of Decree 54".

Zina Mejri, founder of the fact-checking platform Falso, also echoes these sentiments. Mejri's team confronts the anxiety of legal repercussions with every investigation, especially those concerning the President.

The approach of QLM, a digital explanatory media outlet, underscores a strategic avoidance of politics that is primarily market-driven but also implicitly influenced by the political environment. QLM, which was launched in June 2022, was established after the pivotal political changes of July 25th, 2021, and its editorial policies were carefully crafted with an awareness of the increasingly repressive climate for political journalism, a trend that was later codified with the introduction of Decree 54. As a for profit media outlet which sought to position itself in the explanatory media niche, QLM avoided politics not "out of fear or concern over Decree 54 but purely as an editorial and marketing choice" as the explanatory approach which is key to their brand "is very difficult to implement when it comes to political issues".

"

As the media's director, I would also be afraid for the safety of my team in the current environment if we had to address this kind of topic, because the consequences are so random and arbitrary"

Amine Azouzi – QLM's founder

Access to information is increasingly restricted

Access to information has become increasingly difficult in Tunisia's current media environment, and this challenge is shaping how journalism is practiced.

Mehdi Jelassi of the National Syndicate of Journalists of Tunisia provides a historical perspective, noting that the regulatory framework governing press freedom and access to information was under attack even before the current administration.

The framework's erosion has accelerated since the 25th of July 2021, with de facto dismantling of established norms and practices. He cites a circular issued by Prime Minister Najla Bouden in December 2021 [1] which, according to him, mandates that all communications require prior approval from the Prime Minister. Although the circular merely mandates all ministries to share with the Prime Minister's Office a list of spokespersons, and emphasizes "the importance of coordinating with the the Prime Minister's press office the form and substance of all media appearances," evidence suggests that circular's application is more extensive: in practice, it is understood that, by virtue of this circular, all officials, from directors to local officials, require ministerial approval prior to making any statements to the press. According to Jelassi, "a journalist trying to get a school director to make a statement about a wall that collapsed would require prior approval… if you ask any journalist, they would tell you they can't work anymore".

[1] https://ultratunisia.ultrasawt.com/sites/default/files/268137197_4784260128286708_347238073686549105_n.jpg

Emna Chebaame of Inkyfada expresses frustration with this renewed opacity. She recounts experiences of bureaucratic hurdles that hinder journalistic work, including the need for ministerial approval for basic information and obstructive tactics used by government employees, even when dealing with freedom of access to information requests:

> *There's an increased difficulty to access information from the authorities, whatever the topic, from the administration in charge of agricultural seeds to the Ministry of Interior. It's become opaque. There's a visible intention to obstruct access to information and since the 25th of July, there's this notion of prior authorisation. Officials tell us that they need their minister's approval. The minister! Even when it's about very superficial issues... one of our journalists faced a denial of access to information about the agricultural seeds export figures from 2019 to 2021.*
>
> Emna Chebaane – Inkyfada

This sentiment is echoed by the director of the explanatory media QLM whose in-depth coverage of issues such as inflation and speculation is hampered by the lack of accessible data, although these concepts are key presidential talking points, illustrating a broader trend where information scarcity is becoming part of the norm.

Journalists from associative radios provide a more granular view of the issue. They describe a dichotomy between official and unofficial media, with the former having access to state-organised press conferences and the latter being excluded. On the ground, intelligence services and local officials actively categorise media outlets according to their stance on the 25th of July, effectively drawing a line between those who are pro-regime and those who are not.

> *"[the security forces] try to label us as either pro-regime or anti-regime. When the security services interact with us, they ask us about our opinion of the 'massar'.[1] And depending on how they classify you, you may be placed under increased surveillance. After the 25th of July, they came to us and introduced themselves. They were very open about what they were doing. But they also use more sneaky methods to conduct their surveillance."*
>
> Male – Independent Journalist +35 years old

"[1] Massar" translates to "path" or "course" in English. In the context of Tunisia and the events surrounding the 25th of July 2021, "massar" refers to the political path taken by President Kais Saied when he suspended parliament and dismissed the prime minister, effectively consolidating power and introducing a new political trajectory for the country. The term encapsulates the political roadmap implemented by the president.

This categorisation has become the key determinant of access to information at the local level, with outlets perceived as anti-25th of July being systematically excluded from official communications and state-organised events. This creates a challenging environment for the press, where access to information is contingent upon political alignment rather than journalistic integrity.

The future of media freedom

The state of media freedom and freedom of expression reflects both regressions and enduring aspects of the democratic gains post-2011. Despite the contraction of freedoms in recent years, it would be an oversimplification to equate the current climate to the pre-revolutionary state. The environment of free speech prior to 2011 was markedly more repressive with stringent censorship and limited public discourse on political matters. Today's Tunisia, despite its challenges, has not regressed to such an extent. The current government has notably stopped short of employing heavy-handed Internet censorship and traditional media policing that characterised the Ben Ali era.

The IRI survey from September 2023 sheds light on the nuanced reality of this situation. While only 51% of Tunisians feel comfortable expressing their political views openly in their local communities – a figure that seems low compared to the aspirations of 2011 – it nonetheless suggests that a significant portion of the population still exercises a degree of free speech.

However, the same survey uncovers a concerning trend: the Tunisian public is increasingly adopting authoritarian views regarding liberties and individual freedom. The overwhelming majority supporting state control over civil society and political parties, and substantial proportions favouring punishment for online criticism of the President or for television content deemed immoral, highlight an authoritarian temptation that could turn into outright repudiation of individual freedom.

Acknowledging that the media environment is not as repressive as it used to be under Ben Ali, Emna Chebaane from Inkyfada underscores that the hostile environment could impact journalists' motivation, indicating that the struggle is not just against overt repression but also against a pervasive sense of futility that can stifle journalistic initiative.

> "
>
> *After the 25th of July, it's become difficult to attract new staff and it's even more difficult to retain talent. Many people want to leave [the country], and others don't want to write anymore about what's happening in the country.*
>
> ———
>
> Emna Chebaane – Inkyfada

II. Re-examining political participation

Since the events of July 25th, 2021, the political landscape has undergone substantial transformations, reshaping the avenues through which citizens engage with the political process. In this altered political environment, the very concept of political participation necessitates careful revaluation. Not only has the institutional framework experienced significant shifts following the adoption of the constitution of 2022, but the context, significance, and implications of conventional methods of political involvement, including electoral participation, protests, and various other forms of engagement, have undergone profound alterations.

Disengagement from the electoral process

The credibility and viability of the political process as a pathway for political representation have been called into question by the opposition. Although new legislation has not explicitly targeted or excluded opposition factions from participating in elections, the electoral law has introduced new rules that significantly alter the traditional electoral landscapes. These rules diminish the electoral advantages traditionally held by political parties, instead favouring locally influential individuals.

As a strategic response to the altered rules but also as a reaction to the broader political climate, most opposition parties have opted to self-exclude from the electoral process by boycotting the ballot. This position is particularly understandable in light of the fact that, while the electoral space remains technically open, the confluence of several factors creates an environment that is less than conducive to meaningful political participation for challengers to the post25-th July authorities: the receding pluralism in the media landscape, the weaponization of disinformation laws and other restrictions on political expression, and the prosecution and arrest of political opponents. In this context, the decision of opposition parties to disengage from electoral processes becomes a rational response to an increasingly hostile political environment. It reflects a strategic calculation that participation under the current conditions may lend legitimacy to a system perceived as repressive and undemocratic.

As a result of these changes, candidates loosely aligned with Kais Saied's agenda acquired a virtual monopoly in the political arena – at least in the institutional and electoral channels that form routine politics –, forming an overwhelming majority of the candidates. The shift was so pronounced that in 10 electoral ridings, they faced no competition and were automatically elected from the first round. The (self-)exclusion of the opposition from the electoral process prompts us to wonder whether meaningful participation in the electoral system is possible or if it becomes essentially devoid of of significance in the absence of friction in routine politics.

The public's disengagement from the electoral process, a long-term trend sharply amplified in the last elections, appears to substantiate this hypothesis. Despite the public media's efforts to encourage voting, turnout for the 2022 legislative election stood at 11%, a record low, compared to 41% in 2019. In a IRI recent survey, 55% of participants indicated their likelihood to participate in the upcoming local elections. Despite this initial promise, actual voter turnout in the first round of the elections on December 24th, 2023, significantly deviated from these expectations, resulting in a mere 11% turnout.[1]

[1] https://www.newarab.com/news/tunisia-low-local-election-turnout-puts-pressure-saied

Can increased awareness solve the disengagement problem?

The increasing trend of abstentionism in Tunisia, characterised by low voter turnout and disengagement from party politics and electoral participation, is a multifaceted phenomenon that cannot be solely attributed to a mere lack of awareness. While media development efforts focused on raising political awareness are important, they may not fully address the underlying causes of this growing disengagement.

A recent IRI poll indicating that only 29% of Tunisians are aware of the upcoming local elections suggest some level of disconnect with the post-2022 institutional and constitutional framework, especially regarding the roles and prerogatives of lower echelons in the political landscape. However, this lack of awareness – or lack of legibility of the new institutional framework – does not fully account for the abstentionist trend. More telling are the figures showing the low favorability rates for political movements and parties, with no group exceeding a 21% favorability rate and 54% of Tunisians stating outright distrust in any politician. These statistics point toward a deeper issue of disillusionment rather than just a lack of awareness or understanding.

The disengagement is evident across the political spectrum. Among those who support the 25th July process, there is a notable disconnect between high favorability for President Kais Saied and actual participation in elections. Despite an 83% favorability rating in a September 2023 IRI poll, this support has not translated into active electoral participation. The fragmented nature of new coalitions and parties loosely aligned with Saied's agenda adds to the complexity, creating an opaque political landscape difficult for ordinary voters to navigate. Furthermore, while Saied's constitutional framework emphasises revitalising local-level politics, a significant portion of the population looks toward strong, centralised leadership for political change, as indicated by the 66% who prefer a strong leader unencumbered by parliamentary processes and elections.

On the other side of the spectrum, those opposed to the 25th of July process displaying varying degrees of disenchantment. Some retain a nostalgia for the previous political order and view the current constitutional framework as illegitimate, despite its validation by referendum in July 2022. Yet, it is important to note that the referendum's low turnout (30%) itself signals a broader disengagement. For others, their abstentionism may stem from a general rejection of politics, a lack of trust in the entire political class, and scepticism toward any efforts to reshape the political system.

Pathways for participation

As Tunisia witnesses growing disengagement from the previously dominant mode of political participation, i.e. elections, it is important not to jump to the conclusion that Tunisians have lost their appetite for political participation or that political participation is entirely obstructed. Instead, it is important to examine the various modes of political participation that are available to citizens. In this context, the distinction between routine politics and contentious politics, as outlined by McAdam, Tarrow, and Tilly in their Simple Polity Model,[1] becomes particularly relevant.

Routine politics offers two distinct avenues for participation within established political institutions and processes: electoral participation and advocacy through direct engagement with policymakers. A notable instance of advocacy is RUTMA's recent lobbying of parliamentarians to demand an exemption from the broadcasting fee for associative radios. However, engaging in routine politics and being part of the polity involves having routine access to political channels.

Those who align with the July 25th agenda not only do not have moral objections to being part of the polity, but they are better positioned to enjoy regular access to political channels, which facilitates their participation in both electoral processes and policy advocacy. However, those in opposition and those on the margin struggle to gain such access. Effective advocacy often requires navigating and possibly endorsing a system that may be seen as restrictive or non-representative, posing ethical dilemmas for those who seek change from outside the established framework. Marginalised groups, such as rural communities or minorities (e.g. sexual, ethnic, subcultural), lack political capital and may not have the necessary connections or influence to lobby for their interests as RUTMA did.

By contrast, contentious politics represents the pursuit of political objectives through non-institutionalised means. This includes protests, social movements, and forms of activism and political expression that may be described as disruptive or boundary-pushing. Within this category, McAdam, Tarrow, and Tilly identify two forms: contained and transgressive contention. Contained contentious politics operate within the bounds of legality and social norms, while transgressive forms, such as civil disobedience, push these boundaries, often bringing higher risks. Engaging in contentious politics, particularly its transgressive form, has become increasingly challenging due to legal uncertainties and threats to civil liberties, reflecting the high stakes of challenging the status quo in Tunisia today.

The line delineating lawful and unlawful conduct, particularly in the realms of speech and journalism, has become increasingly blurred. This ambiguity intensifies the uncertainty surrounding the legal repercussions of participation in contentious politics, potentially leading to an exaggerated perception by the regime of what constitutes transgressive behaviour.

[1] McAdam, Doug, Sidney Tarrow, and Charles Tilly, Dynamics of Contention, Cambridge Studies in Contentious Politics, Cambridge University Press, 2001.

Implications from a media development perspective

Encouraging political participation through the media or addressing the public's need for political information in Tunisia is fraught with challenges, especially in light of the existing restrictions on speech and vague legislation. Laws that criminalise the spread of false rumours and mis- and disinformation can be applied arbitrarily, creating a precarious situation for content creators, citizen journalists, and media partners. This legal ambiguity places a significant burden on donors and media development actors, who must navigate these complex and potentially hazardous waters. The principle of "do no harm" becomes paramount in this context. Any encouragement or support for media engagement in political discourse must be carefully weighed against the risk of legal repercussions and possible persecution for those involved. This environment demands a strategic and sensitive approach, ensuring that efforts to foster a healthy media landscape and promote civic engagement do not inadvertently expose participants to undue harm or legal jeopardy. This delicate balance is a testament to the challenges faced in promoting free and open political expression in a landscape marked by legal constraints and uncertainties.

For international aid programs focused on media development and aimed at increasing public trust and political participation, these insights are crucial. While raising awareness and improving the legibility of the political process through media are important, these initiatives must also address the underlying sentiments of disillusionment and mistrust. Efforts should be made to promote media platforms that facilitate open, inclusive dialogues, offering a space for diverse political perspectives and discussions on the efficacy and legitimacy of the political system. Such a nuanced approach may help to rekindle public interest and trust in the political process, encouraging a more engaged and informed citizenry.

The current Tunisian context raises critical questions about political inclusivity and the ethical implications of political participation. Should efforts be made to bring outsiders into the polity, making it more inclusive, even if they have reasons to self-exclude? Or should the focus be on empowering challengers to leverage media and other forms of contentious politics more effectively?

These considerations highlight the evolving nature of political engagement in Tunisia, where citizens navigate a complex landscape to find their voice and impact change. Understanding these dynamics is crucial for any international aid program aiming to foster a more participative political environment, particularly through media development. Such programs must navigate this nuanced terrain, supporting initiatives that promote informed public discourse and participation while being mindful of the inherent risks and challenges.

III. Media landscape, consumption habits and trust in the media

Overview of the media landscape

THE PRINT PRESS

The print press in Tunisia, encompassing both newspapers and magazines, has been a longstanding pillar of the media landscape, yet it faces significant challenges in the modern digital era. Historically, the print press in Tunisia has included a mix of state-owned and independent publications, with notable examples like ‹La Presse de Tunisie' representing the former. These publications have served as crucial sources of news, political discourse, and cultural commentary. However, the sector has experienced a dramatic decline in recent years, particularly in advertising revenue, which has fallen by %98 in the last decade [1]. This decline is reflected in the reduced circulation numbers; for instance, ‹La Presse' used to publish 40,000 copies daily with 70,000 for the Sunday edition but now struggles to publish 20,000 copies, a figure likely boosted by state-controlled entities' subscriptions (state-owned companies and ministries). The overall daily circulation in the sector, which was around 160,000 copies before 2011, has significantly decreased to between 100,000 and 120,000 copies [2], indicating a stark reduction in readership [3].

Financial sustainability poses a major challenge for the print press in Tunisia. State advertising in the print press, which was a significant source of income, has halved from 20 million to 10 million per year. The transition to digital has further impacted the print press. While digital extensions have been adopted by some publications, the print press competes with pure digital players and social media platforms. This competition, combined with changing consumer habits and the ease of accessing news online, has led to a significant shift in the media consumption landscape. The print press in Tunisia, once a dominant force in information dissemination, is now facing extinction.

[1] Astruc, Guillaume, Naoufel Ben Rayana, Défis Economiques et d'Organisation des Médias Tunisiens : Etude sur le Financement des Médias et les Stratégies des Annonceurs publicitaires en Tunisie, PAMT2, February 2023, p. 30.
[2] Ibid.
[3] Ibid.

TELEVISION

Television in Tunisia represents a significant segment of the country's media landscape, characterized by a mix of public and private ownership, with the sector exhibiting diverse programming and wide-reaching influence. Public channels, such as Tunisian National Television, coexist with private channels like Nessma TV and Hannibal TV.

While the 8 pm news on Watania attracts between 600,000 to 1.2 million viewers daily, the trend is toward disengagement from television consumption. A significant portion of the population, estimated at 50% by Mediacom, reportedly does not engage with television,[1] indicating a shift in media consumption habits toward digital platforms. Although recent and granular media consumption data is unavailable, this proportion is expected to be lower among young people under 35: in September 2020, only 14.6% of young people reported watching television often or very often.[2]

A unique feature of television programming, which may partly explain disaffection for this medium, is the seasonality of content production. The state-owned national television group (Watania 1 and 2) is criticised for the paucity of its content, except during Ramadan, the only period during which new major productions are aired. While Watania 1 is only capable of attracting large audiences during the news segment, the nominally youth-oriented Watania 2 channel re-broadcasts all year long episodes of the hugely popular Choufli Hal series which was discontinued 14 years ago. On private television, the seasonality of content is less pronounced, although they too only produce fictional content for Ramadan, which accounts for 50% of Hiwar Ettounsi TV's annual revenue. Since the events of July 25th, there has been a noticeable shift in the off-season programming of private television channels in Tunisia. Moving away from political content, these changes reflect not only adjustments to a constrained broadcasting environment but also cater to the audience's growing weariness over divisive political discourse. Tunisian viewers have shown a clear preference for less polarizing and more varied content. In the face of economic pressures, private television networks in Tunisia have increasingly incorporated teleshopping segments – which have become ubiquitous - into their programming. This pivot serves as a strategic response to dire financial difficulties, tapping into direct marketing to bolster revenue streams.
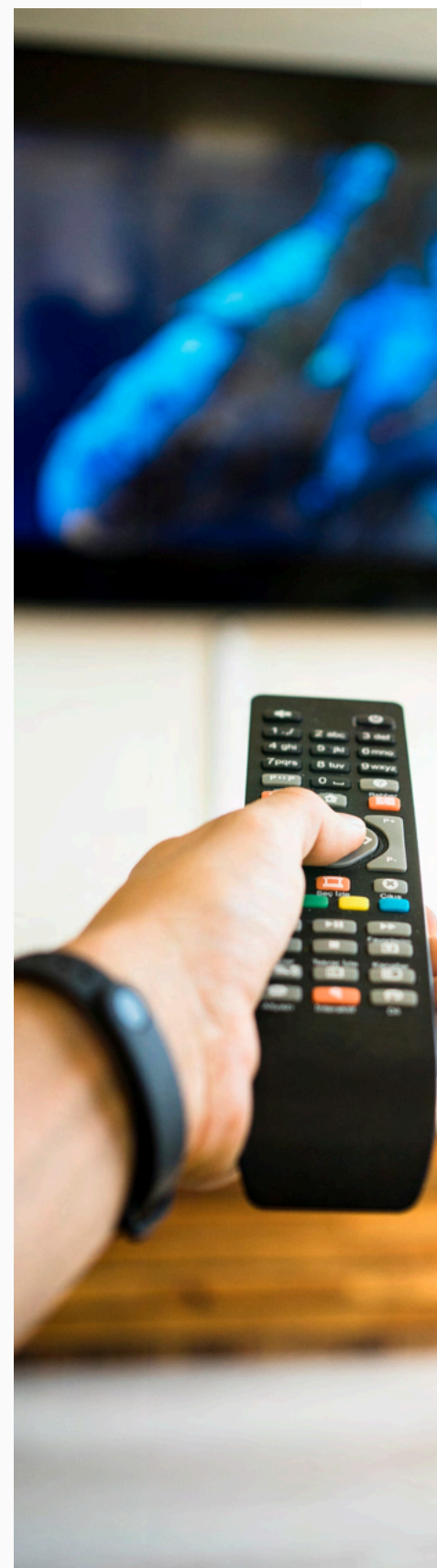
[1] Astruc, Guillaume, Naoufel Ben Rayana, Défis Economiques et d'Organisation des Médias Tunisiens : Etude sur le Financement des Médias et les Stratégies des Annonceurs publicitaires en Tunisie, PAMT2, February 2023, p. 83.
[2] Sayah, Habib, Tunisian Youth and the Media: Perspectives on Traditional and Alternative Media, I Watch, December 2020,
[3] Astruc and Ben Rayana, op. cit., p. 34.

The market, according to market analyst Hassen Zargouni, may not support more than four economically viable private TV stations,[1] against nine currently licenced stations. Media economy expert Ahmed Amine Azouzi is even more pessimistic, and predicts a massive consolidation of the traditional media sector – excluding state-owned media – and that only two or three traditional outlets will survive in the long-term provided that they develop their digital offer.

[1] Astruc and Ben Rayana, op. cit., p. 34.

Radio

Radio in Tunisia presents a dynamic and varied landscape, comprising public, private, and associative (community-based) radios, each serving distinct segments of the audience with diverse content and operational models.

12	**17**	**22**	
Public Radio Stations	Private Radio Stations	Assocative Radio Stations	

Public radio stations, numbering 12 in total, are state-operated and play a significant role in providing news and cultural content to a broad audience. These stations have a longstanding presence in the Tunisian media ecosystem and are often seen as pillars of traditional broadcasting.

On the other hand, **private radios** have carved out their own space, with Mosaique FM, the first historic private radio launched in 2003, leading the pack. Mosaique FM, with its wide reach of 1.2 to 1.6 million listeners per day, dominates the private radio sector. Radios remain a pivotal source of information for many, delivering content through traditional FM broadcasts and leveraging social media platforms to share engaging snippets of their programmes. This dual approach allows radio stations to maintain their role as trusted news providers while maximizing the reach and engagement of their content in the digital realm, where bite-sized audiovisual segments have the potential to go viral. However, out of 17 private radios, only Mosaique FM and Jawhara FM are deemed financially viable.

Associative radios, numbering 22 licensed stations and 14 web radios, play a crucial role in community-level broadcasting. Operating at the intersection of traditional and alternative media realms, community-centric radio stations in Tunisia navigate a unique position. They lean towards the alternative spectrum due to their grassroots, citizen-driven focus, serving specific local interests and fostering community engagement. Yet, they retain traditional media characteristics, often relying on the expertise of former national radio correspondents, [1] which influences their tendency to emulate established broadcasting formats. They are particularly significant for their hyper-local content and their ability to cater to specific community needs, which was notably evident during the COVID-19 pandemic when they played a key role in awareness-raising.

DIGITAL AND ALTERNATIVE MEDIA

Digital and alternative media in Tunisia are experiencing significant growth and diversification, reflecting a broader shift in media consumption habits towards digital platforms. Data from Digital 2024 Tunisia by DataReportal highlights this trend, revealing that Tunisia has a high penetration of internet users at 79,6% of the population, and active social media users accounting for 56.9%. This digital engagement is further emphasized by the fact that 98.8% of social media users access these platforms via mobile devices. The diversity of digital media consumption is evident in the popularity of various platforms: YouTube, with a potential ad reach of 7.12 million; Facebook, with a potential ad reach of 7.1 million; Instagram, with 3.25 million; and emerging platforms like TikTok, which has 5.32 million users aged 18 and above in Tunisia in early 2024, showing a particular appeal among younger demographics.

1] Many of whom volunteer after having been laid off by national radios experiencing severe financial difficulties.

The landscape of digital and alternative media in Tunisia is rich and varied, encompassing podcasts, YouTube channels, and niche media outlets that operate across multiple social media platforms including Facebook, Instagram, TikTok, and Discord. This variety caters to a range of interests and demographics. Individual content creators are a vital part of this ecosystem, leveraging platforms like YouTube and personal blogs to reach audiences with unique and often innovative content. For instance, notable Instagram influencers like Beki, with 2.8 million followers, and TikTok stars like Eya Cherni and Dhouha Laribii, with 6.4 million and 13.9 million followers respectively, exemplify the significant impact and reach of individual creators in the digital space.

In the digital space, a networked approach among individual content creators is gaining traction. Many have started operating as collectives or through communication agencies dedicated to influencer marketing. Yalla Academy, for example, offers training to aspiring content creators who, upon graduation, join a support network which offers commercial collaboration opportunities.

Another trend is the emergence of alternative digital media platforms that are distinct from the early 'digital pure players' such as the mainstream Business News and investigative outlets like Inkyfada, Al Katiba, and Nawaat . Emna Chebaane from Inkyfada acknowledges that although it incorporates alternative aspects, this website belongs, in essence, to the traditional media paradigm. She underscores that while their platform stands out for its innovative design and advanced data visualization techniques, at its core, it adheres to the organisational and cultural tenets of traditional journalism. Despite covering unique stories that often go unreported by other outlets, Inkyfada's internal structure, including editorial hierarchies and productivity expectations, remains rooted in conventional media practices. This adherence to tradition influences not only the platform's internal dynamics but also shapes the nature of its journalistic outputs.

The newer digital platforms often do not identify strictly as 'media' in the traditional sense, largely due to the fact that they operate exclusively through social media channels but also because they operate outside journalistic frameworks: they are not staffed by professional journalists, their focus extends beyond journalism, and they follow codes that are native to the digital realm and alien to traditional journalism. They come in various legal forms; some operate as for-profit corporations, others as associative media, and many function informally without a legal entity.

Despite this, they are organised groups or structures with distinct strategies, editorial lines, and often operate multimodally across different social media channels, each with tailored content for varied audience segments. Like individual content creators and social media influencers, these alternative platforms exhibit heightened awareness of the segmentation of the Tunisian public. While traditional media interlocutors, including associative radios, have struggled to define their target audience – because they operate with a mass media mindset, yet often fail to reach masses –, interviewees representing alternative digital media were very specific when defining their target audience and demonstrated a sophisticated understanding of that audience's composition, socio-economic background, and interests.

Highlighting the diversity of this phenomenon, platforms like <u>QLM</u>, with a following of 159k on Facebook, engage in explanatory journalism targeting millennials with non-polarising content designed to pique curiosity. <u>Lyceena</u>, commanding a million subscribers on Instagram, focuses on school-related news and has become a significant mobilization force among high school students, even engaging in advocacy and negotiations with the Ministry of Education. <u>Deep Confessions</u>, a mental health podcast, offers long-form interviews to its 132k followers across three social media channels, catering to the youth's burgeoning interest in mental wellness. <u>Boubli</u>, an expansive operation with 1.375 million subscribers across five platforms, is designed as a competitive alternative to mainstream media for marginalized youth. It has recently expanded into a multi-channel network with its offshoot brand Freesh, which hosts political debates from a youth perspective, solidifying its position as the go-to media for Gen Z and reaching marginalized youth demographics that are often overlooked. Boubli also fosters creative talent through its incubator and training programmes and actively bridges the gap in opportunity for aspiring content creators hailing from marginalised communities, equipping them with skills and communication resources to make their voices heard.

Watania TV: a case study

Based on the findings of an IRI survey conducted in September 2023, national television stations emerged as the predominant source for political information among Tunisians. A notable 36% of respondents indicated relying on national, i.e. state-owned, television channels to meet their needs for political information.

Which sources of information do you use most frequently to gain political news and information?
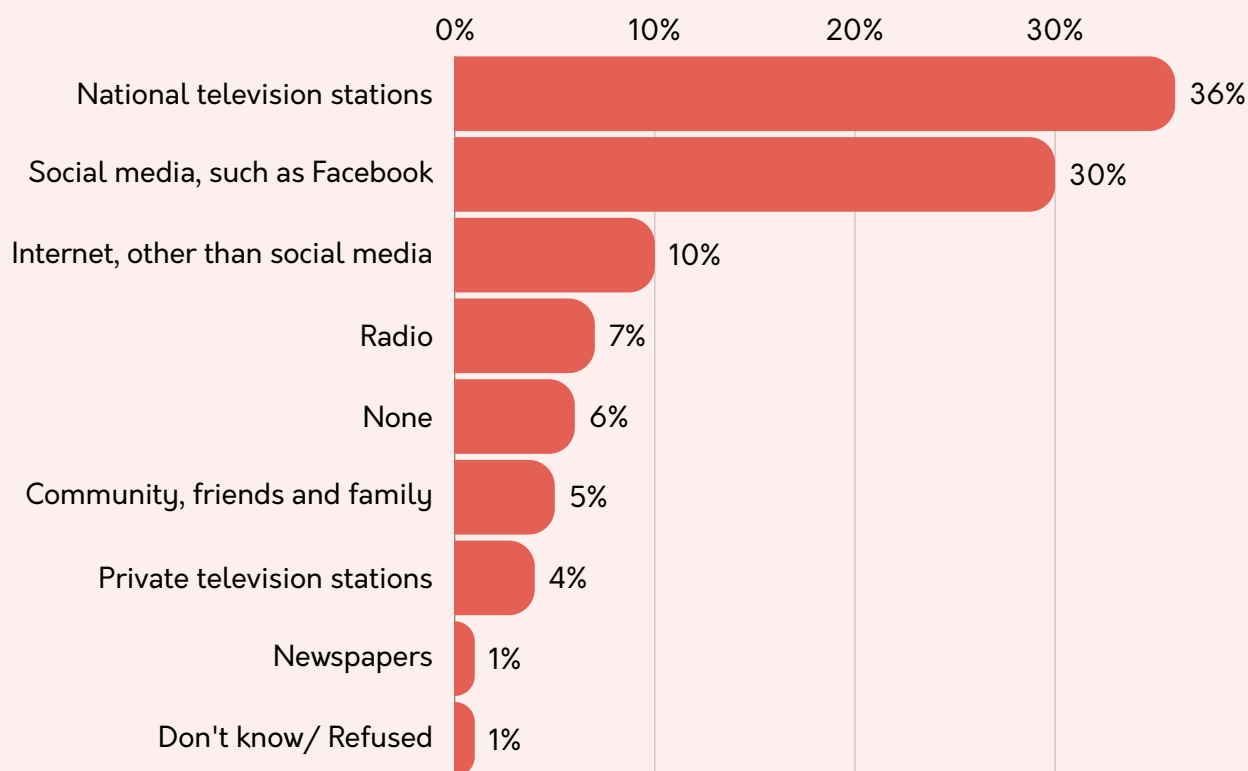
* IRI National Survey of Tunisia, August–September 2023

However, this statistic suggesting the continued importance of television in Tunisia's media consumption landscape should be interpreted with caution, taking into account several mitigating factors such as Watania's avoidance of contentious topics and the absence of competition from the private sector in televised news programming.

Is Watania truly the most trusted media?

Respondents to the IRI survey were questioned about the sources they turn to to acquire political information and the findings cannot be generalised to make broader inferences regarding the entirety of Tunisian media consumption preferences.

Furthermore, favouring national television channels does not necessarily indicate a broader inclination toward television. In fact, just 4% of respondents express a preference for private television channels, a percentage that falls below the preferences for community, friends, and family (5%), radio (7%), non-social media websites (10%), and social media (30%). Private television actually only outranks newspapers, which receive preference from less than 1% of respondents.

The preference for national television is not consistent across various age groups and educational levels; it is significantly influenced by these variables – while gender does not make much of a difference. When analysing the 36% preference rate in more detail by considering the age of the respondents, it's noticeable that only 21% of individuals aged 18–35 favour national TV, whereas this preference rises to 56% among those aged 56 and older. Additionally, it holds the top position in the media consumption choices of individuals with only primary education (51%), while it is less prominent among those who completed high school or pursued vocational training (30%), and even less so among those with higher education qualifications (24%).

Which specific media outlet, such as a specific TV channel, social media platform, radio station, newspaper, website etc. do you consider most trustworthy for political news and information? (spontaneous response)
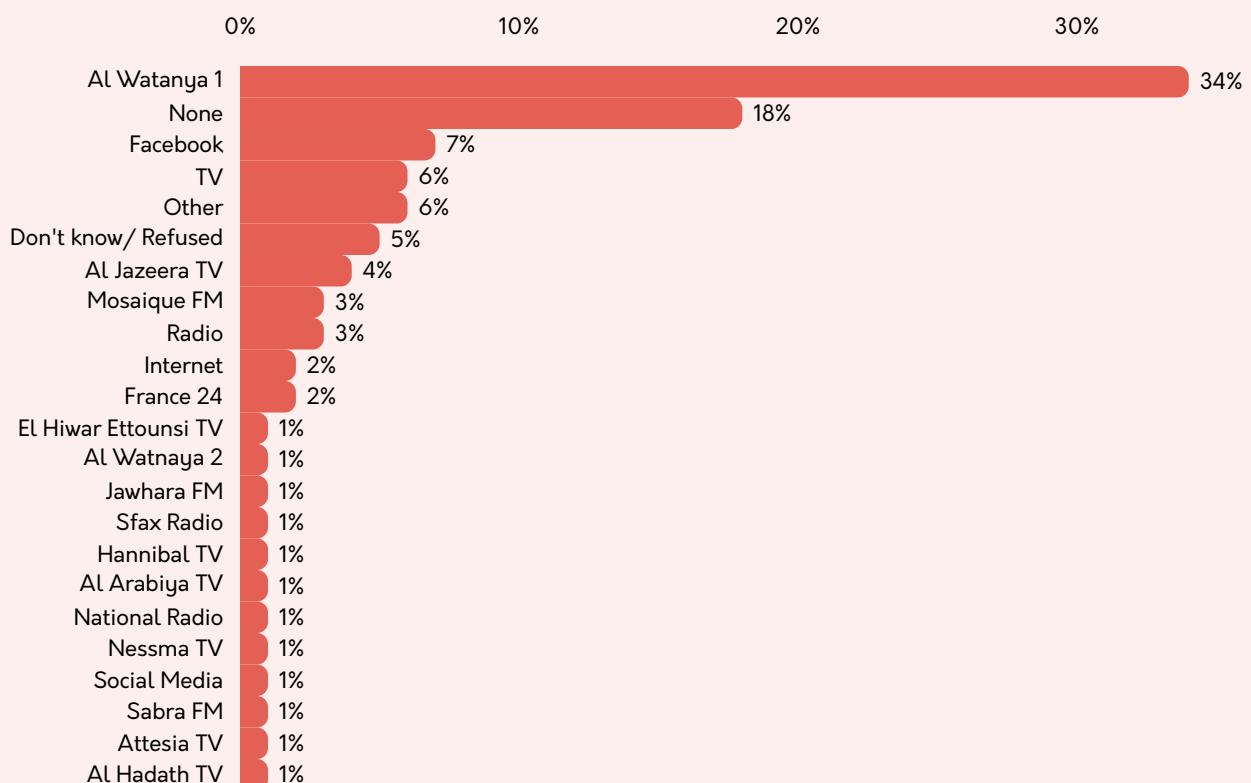
* IRI National Survey of Tunisia, August–September 2023

Inquiries about the most trusted source of political information reveal that consumption is underpinned by trust: the state-owned Watania TV also holds the highest level of trust, with 34% of respondents placing their confidence in it. This level of trust remarkably surpasses that of any other source. For instance, Facebook, which is the second most trusted source, is considered most trustworthy only by 7% of respondents.

Watania's relevance rests on a single show

Before examining the reasons for trust in Watania, it should be noted that its relevance in the Tunisian media consumption mix rests entirely on a single programme, the 8 PM news segment, while remaining strikingly unresponsive to many of the public's needs.

> *Trust has nothing to do with the editorial policy or the agenda of the national television. Trust rests overwhelmingly on one single factor which was highlighted by a study conducted by Article 19. The audience of Watania TV is tied to its evening news programme; nothing else.*
>
> Mehdi Jelassi, former president of the National Syndicate of Journalists of Tunisia (SNJT)

This conclusion is shared by a national television executive who told us: "We don't have our own statistics and we haven't conducted surveys but two studies conducted by [an international partner] show that Watania is almost disconnected from youth and that our viewers are mostly above 40 years old, and that the most viewed show is the news programme [...] Trust in Watania is strictly related to the news programme. There is no other show."

Drivers of trust

Our interlocutor from Watania identifies multiple drivers of trust in the state television's news show.

First, the high level of trust, especially among older generations, in the state-owned TV's 8 o'clock news segment can be partly attributed to cultural and habitual factors rooted in its longstanding presence in the Tunisian media landscape. The programme's enduring nature as one of the oldest, if not the oldest shows in Tunisia plays a significant role in shaping this trust. For many in the older generation, Watania's news programme has been a consistent presence throughout their lives. This familiarity breeds comfort and a sense of reliability. The programme likely represents a fixed point in their daily routine, something they have turned to for decades for news and information.

Second, our interlocutor from Watania TV points out that the state-owned channel's "news show faces no competition" and that it is difficult for viewers to compare it to a benchmark in the absence of a competitor programme. Several privately-owned channels such as Attassia and Nessma made attempts to launch news programmes but they all abandoned this resource-intensive endeavour. Not only can Watania TV afford a widespread network of local correspondents, but also trucks and equipment enabling it to flexibly and rapidly deploy its crews. These resources are particularly useful in times of crisis such as the COVID-19 pandemic or major events such as elections.

> *"In times of crisis, Watania transforms into a live coverage apparatus. When it comes to creative programming, entertainment, and complex products, we are incapable of producing them because they require the kind of innovation skills you tend to find in freelancers rather than civil servants. However, Watania's strength is its capacity to cover major events… We can cover any major event that doesn't require major innovation skills. We can do it and excel at it because we have the proper means. But creative products such as youth shows require creative skills which we don't possess."*
>
> National television executive

However, it's important to recognise that the absence of traditional news programming on private TV stations doesn't mean that these channels have eschewed political content altogether. They have embraced political talk shows, known as "plateaus," as their primary medium for political information. These shows became a defining feature of the country's political media coverage in the last decade, often mired in controversy and amplifying polarisation. Tunisian audiences have grown weary of these programmes, which typically follow one of two formats. The first involved biased "chroniqueurs" (permanent guests) who, alongside similarly opinionated hosts, often confront or gang up on invited guests, creating a skewed and contentious discourse.

The second format seeks to deliberately invite representatives from opposing factions, not for balanced debate, but to stir controversy and conflict. This approach to political coverage, marked by evident bias and a penchant for controversy over constructive dialogue, has led to a sense of fatigue and disillusionment among viewers, longing for more balanced and informative political discourse on television. "The media landscape is characterised by chaos driven by the show hosts, which puts Watania in a position where it remains perceived as the cleaner one."

Which brings us to the third reason advanced by the Watania executive: it is not difficult to remain factual and balanced when you avoid complex and controversial topics altogether. He admitted: "After all, the news programme does not include big investigations that may generate some doubt or controversy. It focuses on stating simple facts, based on the information released by the government."

Public media, official media or propaganda outlets?

Such characteristics are not new in the post-2011 Tunisian media landscape. It is widely recognised that, prior to the revolution, state-owned media served as propaganda tools for the regime. A majority of privately-owned media were also mobilised in the regime's propaganda efforts. While private media embraced the revolution as a chance for emancipation, if not from capital and political interests, at least from the state's control, numerous observers argue that state-owned media missed the opportunity. They predominantly clung to outdated regime tendencies or at the very least, displayed hesitancy in adapting. However, the expectations for state-owned media have significantly evolved in the post-revolution era. There is now a prevailing belief that these outlets should maintain neutrality, serving the public interest rather than acting as mouthpieces for the government. This expectation encompasses a commitment to pluralism by representing and addressing the needs of marginalised audiences, providing factual reporting, and demonstrating increased objectivity – areas often overlooked by private media.

While none of the focus group participants or interviewees accused Watania of reverting to the overt propaganda tactics characteristic of the pre-revolution era, they did express concerns about its current neutrality. The factual nature of Watania's reporting is recognised, but its editorial choices are being questioned. For unionist Mehdi Jelassi "Even if the news are underpinned by an agenda, its reporting is factual. people trust the factual character of the news that are reported by Watania, but not Watania's agenda." Accusations of being a government mouthpiece, not necessarily through explicit misinformation but rather through omission of certain topics, were prevalent in the discussions conducted by the team of consultants. This perceived tendency to avoid controversy or any subject that might challenge the interests of the current government or the presidency indicates a shift toward a more "official" or "governmental" media stance.

> "
>
> *Public media have no purpose without a democratic space that includes political opposition. What is a state-owned television? It is supposed to provide space for civil society and the opposition and for those who govern. It should create some balance.*
>
> ———
>
> HAICA member

An illustrative example of this shift is Watania's coverage (or lack thereof) of contentious issues like the migrant crisis. During a period when pro-government factions were involved in a campaign against Sub-Saharan migrants, Watania reportedly steered clear of the topic.

These insights reveal a nuanced picture of Watania TV, one where its commitment to factual reporting coexists with concerns about its editorial independence and its role in a diverse and democratic media landscape. The trends discussed with our interlocutors suggest, indeed, that state-owned media are no longer functioning as open, neutral civic ground, but instead present a narrowed, possibly government-aligned perspective, limiting the diversity of viewpoints and civic discourse.

IV. The economic challenge

In this section, the analysis delves into the critical economic challenges currently facing the sector. For media industry expert Ahmed Amine Azouzi, "economic viability is the greatest challenge today" because the media sector's dependency on advertising revenue is under significant strain.

Legacy media

In the Tunisian media landscape, the economic viability of the legacy or traditional media sector, encompassing press, television, and radio, is facing considerable challenges. For public media, economic viability is not the primary concern due to their access to substantial resources. However, these entities require deep restructuring to adapt to the evolving media landscape.

Private traditional media, on the other hand, are experiencing a severe downturn, often described as a "secteur sinistré" or a sector in distress. The advertising market, their primary revenue source, has significantly shrunk. According to the PAMT study, only a few private radios like Mosaique FM and Jawhara FM are economically viable. The rest are struggling with severe financial difficulties and are unable to compete with these major players.

Television has been heavily impacted as well, turning to teleshopping and other alternative revenue streams to compensate for the loss of traditional advertising revenue. This shift reflects the sector's desperate attempts to find new financial footholds in a rapidly changing market.

"

"The media sector depends on another sector, the advertising sector, which is in an unprecedented slump. The figures for 2022 for advertising budgets were 25% less than the average of the 3 previous years when the market was already tiny. In 2022, the total was 145 million dinars before tax according to Sigma. It's nothing. So there are two possibilities: either these budgets grow significantly or the number of media will decline. At least if the economic models remain the same."

Ahmed Amine Azouzi, a media expert

When considering the future of traditional media, Ahmed Amine Azouzi predicts a massive consolidation within the sector. He asserts that the current model is outdated and unsustainable: "It's over for traditional media. They will survive. Some big brands like Mosaique will remain. It's a major source of information. Other brands will survive provided that they manage their digital transformation. Perhaps two or three of them will survive thanks to a more developed digital offer."

This statement underlines the necessity for traditional media to embrace digital transformation, as audiences shift away from analogue media consumption. The survival of these entities largely hinges on their ability to adapt and innovate in a rapidly digitalising world.

Mehdi Jelassi of the journalists' union SNJT agrees: "Only Mosaique and to a lesser extent Jawhara FM are financially viable. They are backed by powerful business people. Hiwar Ettounsi and Nessma are struggling. Public media are plagued by structural problems. The national television has 1100 workers on its payroll but in reality only 200 are working journalists. What is it producing? […] Then there's private media, audio-visual media, which have been awarded frequencies. They have been granted broadcasting licences. Their number is disproportionately large compared to the size of the Tunisian market. The advertising market is too narrow for this number of broadcasters in ordinary times, let alone in times of crisis. [A good media landscape] doesn't mean a lot of media outlets. There should be a smaller number of outlets but more viable outlets."

Associative radios

Tunisian associative radios, existing within an increasingly digitised media environment, face unique economic challenges that are amplified by several factors. As a form of traditional media, they do not only contend with the general economic issues faced by private radios but also grapple with additional difficulties stemming from their hyper-local nature and regulatory constraints.

It is difficult to capture a share of the advertising market

Some of these radios operate in economically marginalised regions where advertising opportunities are scarce. Their hyper-local character, while crucial for addressing specific community needs, limits their access to broader advertising markets.

Moreover, unlike national radios or even larger regional radios, which may claim audiences in the hundreds of thousands, the audience of associative radios is limited by their narrow geographic scope – which is dictated by their broadcasting licence. This reduced reach may not be as appealing to larger corporate advertisers. On top of that, a particular disadvantage for associative radios is the lack of comprehensive audience measurement data.

Unlike larger radios, associative radios are not included in the two main audience measurement systems (Sigma Conseil and Media Scan). This lack of audience metrics is a critical shortfall, as these measurements are key performance indicators in the advertising industry. They guide corporate advertising decisions and heavily influence advert pricing (PAMT, 2023). Consequently, associative radios find themselves unable to convincingly demonstrate their value for money in line with industry metrics standards, further limiting their appeal to potential advertisers and compounding their economic challenges.

Nefzawa FM, for instance, has only been able to secure two advertising campaigns in seven years. Other radios who participated in our focus group discussion have been able to tap into the local industrial fabric to generate advertising revenue with varying results. Most associative radios, though they have engaged with the limited number of large industrial groups in their areas, characterise these relationships as "sporadic" or "seasonal." Typically, these larger corporate advertisers show interest in their services mainly during key seasonal events, such as Ramadan. This pattern of engagement renders advertising a less constant and stable source of revenue for the radios.

Those radios that adopt a less ambitious approach in targeting advertisers seem to navigate these challenges more effectively. Instead of pursuing a few large national companies operating in their vicinity, they focus on selling adverts to small or micro-enterprises deeply rooted in the local community, such as driving schools or bakeries This strategy aligns better with the nature of associative radios, as these smaller businesses are genuinely interested in local audiences, who constitute their entire customer base. A successful practice among these radios has been to offer a comprehensive package of services to these small enterprises. This package includes the ideation, production, and broadcasting of radio ads, tailored specifically to the local context. Such an approach not only ensures a steadier flow of revenue for the radios but also builds stronger, more sustainable relationships with the local business community. By focusing on this segment of advertisers, associative radios can create a more reliable economic model that aligns with their hyper-local focus and audience reach.

A worrying but isolated incident surfaced during a focus group discussion with associative radios, pointing to potential challenges these stations may face with local authorities. Though based on a single report and not indicative of a widespread trend, it raises concerns worth monitoring. A participant in the focus group shared a particularly troubling experience:

> *"Officials also scheme to cut your funding if you ask them questions that make them uncomfortable. It happened to us. A municipal official paid a visit to the companies that advertise on our radio and persuaded them to cut our funding." This account, while not yet reflective of a general pattern, highlights the potential vulnerabilities of associative radios to political pressures, especially in their reliance on local advertising.*

FGD participant, Male +35 years old

Associative radios' advertising revenue is capped anyway

Even if associative radios somehow manage to generate significant advertising revenue, this source of income is capped by strict regulations. They are limited in the amount of advertising they can broadcast, with a cap of 3 minutes of advertising per hour, which increases to 5 minutes during Ramadan. Furthermore, the revenue they generate from advertising is restricted to a maximum of 30% of their total income. By contrast, private radios operate with more commercial freedom: their advertising revenue is not capped, and they are allowed up to 8 minutes of advertising per hour, and up to 12 minutes during Ramadan. These regulations for associative radios aim to maintain their focus on community service and local content, rather than commercial interests.

The shortfall in advertising revenue, stemming from a combination of economic constraints and regulatory limitations, is not counterbalanced by public funding, leading to a financial predicament for these community-focused broadcasters. The regulatory cap on advertising revenue implicitly recognizes that associative radios serve a public interest mission, one that should not be overshadowed by commercial considerations. Following this logic, the restriction on advertising could be seen as a rationale for the state to provide public funding, compensating for the loss of advertising income and enabling these radios to fulfill their public service roles effectively.

Public funding: nowhere to be found

Despite this rationale, the state currently does not offer substantial funding to associative radios. As revealed in focus group discussions, some radios have received modest grants, typically up to 5,000 dinars (USD 1596), from their local municipality or the electoral commission ISIE. These grants, while helpful, are not only minimal but also sporadic and project-specific. The High Authority for Audiovisual Communication (HAICA) has proposed creating a "support fund" to aid audiovisual creation. However, this initiative is still in the planning stages, with uncertainties surrounding its establishment, grant criteria, and independence.

Experts Jean-François Furnémont and Ahmed Amine Azouzi have raised concerns about the potential conflict of interest if HAICA, as a regulatory body, were to administer this fund (PAMT, 2022). The worry is that HAICA's role in awarding content production grants, which it would later regulate, might compromise the fund's impartiality. Although HAICA plans for a participative governance structure that includes various stakeholders, the specifics of this representation and the extent of its independence remain unclear. This ambiguity fuels concerns as to whether the fund, if established, will genuinely support pluralism and remain unbiased, rather than being co-opted to favour specific groups or ideologies. As such, the future of this support fund and its role in bolstering the financial viability of associative radios in Tunisia is still an open question.

Alternative economic models ?

In the meantime, some associative radios have attempted to develop alternative economic models. Ideas such as merchandising or opening side businesses like restaurants or the sale of audiovisual production services to fund operations have been explored. However, the viability and sustainability of such models warrant scrutiny. For instance, in a focus group discussion, the representative of an associative radio highlighted the dilemma of relying on such unconventional funding streams. While these methods might offer temporary relief, they may not be sustainable long-term solutions and could divert the radio's focus from its primary mission.

This concern, however, does not apply to I Watch and its Son FM radio. Unlike most associative radios that are part of associations primarily focused on media production, Son FM is a project of I Watch, one of Tunisia's largest and most well-funded civil society organisations, having raised TND 4.8 million in 2022. This arrangement enables I Watch to funnel revenue from diverse streams into supporting Son FM's operations. Significantly, Son FM doesn't rely on advertising, maintaining its independence from commercial interests, a crucial aspect given I Watch's role as an anti-corruption NGO. This unique model of financial support positions Son FM distinctly within the landscape of associative radios, and it can hardly be replicated by other associative radios.

International funding is under threat

In our focus group discussions, it became evident that many associative radios in Tunisia rely heavily on international funding, as local public funding remains largely unavailable. Typically, this support comes not in the form of core funding but project-by-project, often tied to specific themes and provided by media development organisations or other international development bodies. This reliance on international funding has been a significant factor in the development of Tunisian civil society post-2011, a trend not unique to the associative radio sector.

However, the environment for associations in Tunisia is becoming increasingly hostile. President Kais Saied has expressed particular animosity towards civil society organisations, especially those funded by foreign entities. On multiple occasions, he has accused such organisations of serving foreign intelligence agencies' interests, signalling strong opposition to foreign funding of associations. This sentiment, unfortunately, is not limited to President Saied. Various political parties that have come to prominence since 2011 have also displayed hostility towards civil society, often instrumentalizing the issue of foreign funding. Mainstream media have further amplified this narrative, promoting conspiracy theories that paint associations as infiltrated or manipulated by foreign powers working against Tunisia's interests.

A prime example of this phenomenon is I Watch, one of the rare associations in Tunisia that transparently publishes its financial reports annually, detailing its funding sources.[1] Despite its transparency, I Watch has been falsely accused of opacity around its funding by politicians and allied media to discredit the organisation whenever its investigations threaten their interests. This pattern of accusation has been consistent, from parties like Ennahda and Nidaa Tounes to unsuccessful presidential candidate Nabil Karoui[2] and, more recently, supporters of Kais Saied.

[1] https://iwatch.tn/ar/category/29
[2] https://www.tuniscope.com/article/363498/actualites/politique/tunisien-45181840

Adding to this complex scenario is the Nationalist Tunisian Party, a xenophobic political group that has significantly influenced President Saied's rhetoric against sub-Saharan migrants.[1] This party has been instrumental in shaping the debate around foreign funding of associations, underpinning their discourse with a conspiracy theory suggesting that foreign powers aim to alter Tunisia's demographic composition through foreign-funded civil society organisations. This theory mirrors the far-right "Great Replacement" ideology prevalent in Europe.

With a reform of the regulatory framework for associations currently underway, there is a looming possibility of severe restrictions, or even an outright ban, on foreign funding for associations. Such changes could deal a devastating blow to civil society organisations in Tunisia, including associative radios, potentially undermining their operations and further constricting the space for civil discourse and community-oriented media.

Associative radios struggle to pay their broadcasting fees

While most associative radios, grappling with financial constraints, are minimising expenditures, relying heavily on volunteer labour and member donations, they still face unavoidable costs.

A critical incompressible expense is the National Broadcasting Office (ONT) broadcasting fee, a challenge highlighted in the focus group discussion conducted. One participant lamented, Despite being a reduced fixed fee of 18000 Dinars per year (USD 5,800) compared to private radios (some of which pay up to 450,000 Dinars, USD 143,600), it remains a significant burden for many associative radios as evidenced by the collective sector debt to the ONT which amounts to 300,000 Dinars , USD 95,740.

> "
>
> *"We already have electricity, water, Internet bills, and adding on top of that a licencing fee is oppressive."*
> ———
> FGD participant,
> Female +25 years old

The Tunisian Union of Associative Media Network (RUTMA) has been actively lobbying parliamentarians to address the issue of the broadcasting fee. These efforts culminated in the mobilisation of four parliamentarians who, in November, called for an exemption – some even calling for public funding of associative radios. However, there is no guarantee that these efforts will translate into policy changes.

The value of associative radios in the digital age

One possible response to these financial challenges would be for international donors to consider subsidising associative radios – if Tunisian laws and regulations continue to permit this. Such financial support involves a trade-off: allocating resources to traditional media entities that, while struggling to keep pace with digital innovation, continue to fulfil a vital function in reaching other underserved populations.

[1] https://www.bbc.com/news/world-africa-64913796

Nonetheless, it is essential to acknowledge associative radios' unique role in the media landscape. Associative radios, despite their financial struggles and potential limitations in audience reach, represent an essential component of a diverse and inclusive media ecosystem

First, are addressing a key information gap: hyper-local news. Hichem Saidi from HAICA points out: "There is now a media gap. All the media want to be located on the Tunis–Nabeul–Sousse coastal crescent. Not even in Sfax. Interior regions are excluded." This gap is all the more so important as the new configuration of the Tunisian political system emphasises proximity and bottom-up political processes, one of the new houses of parliament being an emanation of the soon-to-be-elected local councils.

Second, local associative radios in Tunisia, as seen through the perspectives of Brian Houston's community resilience framework [1] and Sandra Ball–Rokeach's communication infrastructure theory (CIT) [2,] play a crucial role in fostering community cohesion and civic engagement. Houston emphasises the central role of communication and media in building community resilience, highlighting how local radios can be instrumental in disseminating vital information and aiding in crisis response. Ball–Rokeach's CIT further elaborates on this by underscoring the importance of storytelling infrastructure in communities. Associative radios act as key nodes in neighbourhood storytelling networks, enhancing residents' sense of belonging and collective efficacy, and facilitating civic participation. These radios, therefore, are not just information disseminators but may be pivotal elements in nurturing community identity and resilience.

Associative radios in Tunisia, while an integral part of the traditional media spectrum, face the risk of obsolescence unless they successfully navigate their digital transformation. To remain relevant, they must adapt to the evolving media consumption habits of younger generations, producing content that resonates with emerging expectations. This includes embracing formats like podcasts and short-form visual content, and effectively utilising social media platforms such as TikTok, YouTube, Facebook, and Instagram to maximise their reach and engagement.

Additionally, associative radios require a rejuvenation of their professional culture. As revealed in the focus group discussions, many currently rely on volunteers from legacy media. This includes a large network of local correspondents who, after being laid off from national private television channels and radios due to financial constraints, have lent their skills and experience to associative radios. While this brings valuable expertise, it also risks perpetuating the traditional media's approach. Many associative radios have tended to imitate national radios, adopting their language, codes, and frame of reference, viewing them as the professional standard. However, for these radios to thrive in an increasingly digital landscape, they need to evolve beyond mere imitations of traditional media and develop as true alternatives, offering fresh perspectives and innovative content that differentiate them from the failed models of their predecessors.

[1] Houston, J. B., Spialek, M. L., Cox, J., Greenwood, M. M., & First, J., 'The Centrality of Communication and Media in Fostering Community Resilience: A Framework for Assessment and Intervention,' American Behavioral Scientist, 59(2), 2015, pp. 270-283.
[1] Yong-Chan, K., S. J. Ball-Rokeach, 'Civic Engagement From a Communication Infrastructure Perspective,' Communication Theory, Volume 16, Issue 2, May 2006, pp. 173–197.

Alternative digital media

The media consumption habits in Tunisia are experiencing a significant shift, gravitating increasingly toward digital media, particularly those based on social media. This shift is not just about the platforms themselves but also the diverse nature of alternative media platforms. These range from individual content creators to more structured entities like QLM and Boubli, each offering unique thematic focuses, formats, and organisational structures. Operating primarily in the digital realm, these platforms present a higher economic potential compared to traditional media. With their reduced operating costs, they are well-placed to benefit from the growing preference for digital advertising among advertisers.

The appeal of digital media from an advertising perspective

Despite a general shrinking of advertising budgets and heightened competition for these resources, digital media are currently in an advantageous position. While traditional media like TV and radio still command a significant share of advertising budgets, their influence appears disproportionate compared to their waning impact. In contrast, digital advertising is on a consistent growth trajectory. Major advertisers have expressed significant satisfaction with their collaborations with online content creators, citing excellent value for money. The communication director of Tunisie Telecom, a major advertiser, highlighted the effectiveness of digital influencers in lending credibility to product messages (PAMT2, 2023). Advertisers are keen to align their products with the reputation and image of these influencers.
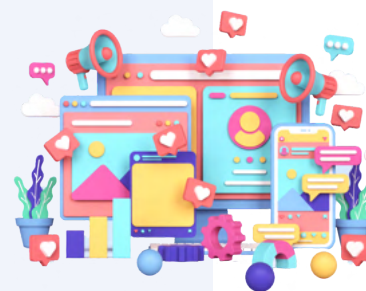
Digital media offer tailored and innovative advertising solutions like native ads, which blend seamlessly with content, enhancing their appeal. Market segmentation, a challenge for advertisers, is more effectively addressed by digital media due to their targeted content and ability to reach younger demographics increasingly moving away from traditional media. Interviews with digital media actors reveal a sharp awareness of their audience and more deliberate targeting efforts compared to traditional media, including associative radios.

A crucial advantage for digital media is their ability to respond to advertisers' need for reliable audience metrics. While associative radios struggle to produce such metrics and the audience data from private radios and television are often questioned by advertisers, digital platforms can provide robust and trustworthy reach and engagement data. This ability to demonstrate value for money through reliable metrics sets digital media apart in the competitive advertising landscape, making them an attractive option for advertisers looking to optimise their investments. As the media landscape continues to evolve, digital media's economic potential, driven by innovative advertising products and precise audience targeting, positions them as key players in Tunisia's shifting media consumption trends.

Another significant advantage of digital media is their ability to address the needs of a segment of the advertising market that remains largely untapped by traditional or legacy media. This includes local restaurants, niche fashion labels, and "maisons d'hôtes" (guesthouses), which often operate with more modest marketing budgets and cater to specific demographics.

Digital media, particularly individual content creators and influencer marketing platforms, offer these smaller entities the opportunity to engage in paid collaborations, providing a cost-effective means of reaching their target audience. This direct line to an engaged, niche audience is not just economical but can yield higher conversion rates as the messaging is highly relevant and personalised. This tailored advertising approach is more suitable for such brands than less discriminate advertising strategies offered by traditional media.

International funding: a secondary source of revenue

In the Tunisian digital media landscape, the potential ban or restriction on foreign funding of associations poses a significant challenge, echoing a concern similar to that faced by associative radios. Notably, some key digital media platforms operate as associations and rely heavily on international funding. For instance, Boubli, run by the Association Tunisienne de Développement de la Culture Électronique (ATDCE), was initially established with core funding from the British Council. While Boubli has diversified its funding sources, including merchandising and production services, it still partly relies on international donors for operational support.

Digital media that are structured as for-profit entities also navigate the terrain of international funding, albeit to a lesser extent. Platforms like Deep Confessions and QLM do receive some international funding but do not rely on it as their primary source of income. In contrast, Falso, the fact-checking platform, was established as a for-profit venture due to governmental refusal to register it as an association. Interestingly, if the ban on foreign funding of associations is enacted, this might inadvertently benefit entities like Falso, which has successfully secured donor support despite its for-profit status.

Moreover, some digital media are considering establishing non-profit structures in jurisdictions perceived as safer, such as European countries. Emna Chebaane from Inkyfada has mentioned this as a strategy to mitigate the impact of potential restrictive laws in Tunisia, particularly the ban on foreign funding proposed by President Kais Saied. This approach reflects a proactive measure to shield public interest media projects from the regulatory threats in Tunisia.

These developments highlight a crucial consideration for donors: the evolving regulatory landscape in Tunisia is pushing public interest media projects to register as for-profit organisations. This shift is not driven by a commercial nature but rather as a strategic response to the threats to freedom of association and the looming restrictions on foreign funding. Donors need to be aware of this reality and adapt their funding strategies accordingly, ensuring that support for public interest media remains viable and effective in this changing regulatory environment.

In discussing the role of international funding in supporting Tunisian media, Ahmed Amine Azouzi, a media expert and digital media owner, emphasises the need for a balanced approach. While acknowledging the immediate benefits of financial aid, he stresses the importance of long-term sustainability.

"International funding can help because the media are facing cash flow issues and having some safety net during difficult periods is important in this context. But I don't think we should excessively rely on [project-based] grants. Donors should provide structural support involving the development of processes, tools, and skills required to enable sustainable development of a media. Receiving funding for a series on climate change's impact in Tunisia is great and can help a lot, but it's important in investing in enabling the viability and autonomy of the media. It's about expertise and also mechanisms. Capacity-building can be helpful but if you build the capacity of a member of staff, I need to have the economic resources to sustain their career progression."

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> Ahmed Amine Azouzi, a media expert

Regional expansion: an emerging trend

Despite the growing share of digital media platforms and individual content creators, the advertising market in Tunisia remains small and is still dominated by legacy media. To circumvent the constraints of the local market, Tunisian digital media are increasingly looking to expand their audience beyond national borders.

Targeting diaspora Tunisians, who more readily pay for digital content, has proved successful for some Tunisian streamers who have collected tips from diaspora followers on platforms such as Twitch or YouTube.

But it is the Middle Eastern market that is on most content creator's minds. Targeting these foreign audiences allows Tunisian digital media to tap into larger and more affluent markets where advertising budgets are generally more substantial, providing greater opportunities for brand collaborations.

Monetisation on platforms like YouTube is another critical aspect. The value of ads on YouTube is influenced by the potential reach in the viewer's country. Tunisian YouTubers have often raised concerns about the lower CPM (Cost Per Mille) rates they receive compared to those in countries with larger and wealthier audiences. By creating content aimed at Middle Eastern countries, Tunisians can benefit from higher traffic and better pricing conditions. For example, the average CPM rate in Kuwait is USD 6.56, while in the United Arab Emirates, it fluctuates between 3 and 10 Dollars according to recent estimates, which is more than what might be expected in Tunisia.

Creators like The V Maker, a tech reviewer, have started to produce content in standard Arabic, which is more widely understood across the Middle East than the Tunisian dialect. This strategic shift allows them to attract a larger audience and benefit from higher ad rates and revenues. This trend of targeting content to suit regional audiences and leveraging the higher CPM rates available in wealthier Middle Eastern markets is expected to grow as Tunisian content creators seek to maximise their earnings potential. QLM, Boubli, and Deep Confessions are currently exploring this option which may become more relevant, especially for associative media in foreign funding becomes restricted.
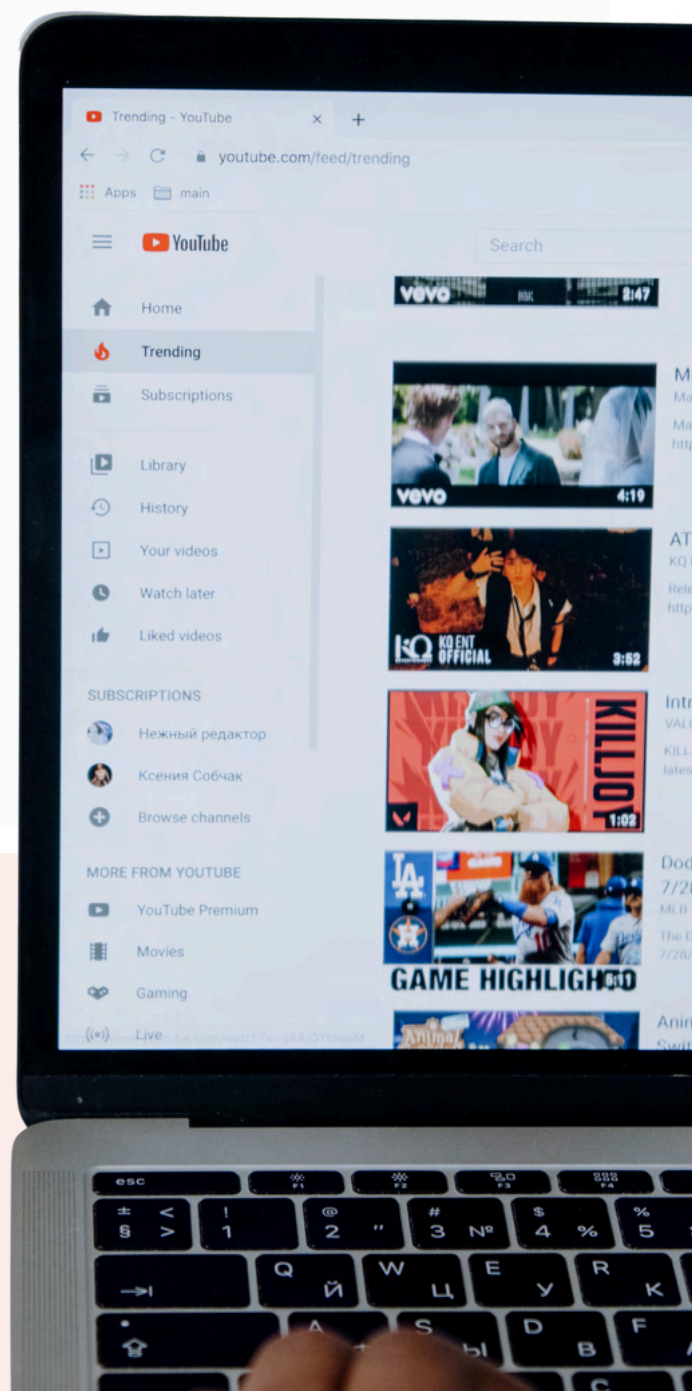
V. Misinformation, disinformation and polarisation

Misinformation and disinformation dynamics

In Tunisia, as in many other contexts, misinformation and disinformation are driven by a variety of factors. Political motivations are often at the forefront, with various actors seeking to influence public opinion or discredit opponents. Hate speech and misinformation/disinformation are frequently interlinked, particularly in contexts where group antagonisms are pronounced. In Tunisia, this intertwining often exacerbates social divides, with misinformation campaigns sometimes serving as a prelude or complement to hate speech, intensifying animosities. This confluence can have real-world repercussions, manifesting as offline harm and deepening societal rifts, as seen in various incidents where online narratives have spilled over into physical confrontations and discrimination.

The campaign against Sub-Saharan migrants

In 2023, Tunisia faced a serious wave of violence and discrimination against Sub-Saharan African migrants, exacerbated by President Kais Saied's public remarks. On February 21st, President Saied linked an increase in crime to Sub-Saharan migrants, suggesting a "criminal plan" to change Tunisia's demographic makeup [1]. President Kais Saied's speech, which ignited a wave of xenophobic sentiment in Tunisia, was directly influenced by a report sent to him by the Nationalist Tunisian Party. This political faction espouses xenophobic views and is known for perpetuating a version of the 'Great Replacement' conspiracy theory. This theory unfoundedly claims that the European Union is orchestrating a demographic shift in Tunisia by replacing Tunisian citizens with Sub-Saharan migrants. Furthermore, it wrongfully accuses civil society organizations, which advocate for the rights of refugees and asylum seekers, of collusion with European intelligence outfits to facilitate this alleged plot.

The President's comments incited xenophobic actions, including mob attacks, evictions, and job dismissals, leaving the migrant community in fear for their safety. Human Rights Watch and Amnesty International reported numerous incidents where migrants were targeted, highlighting cases where victims were physically attacked and robbed.[2] Victims also faced discrimination in their daily lives, from housing evictions to being overcharged for basic necessities.
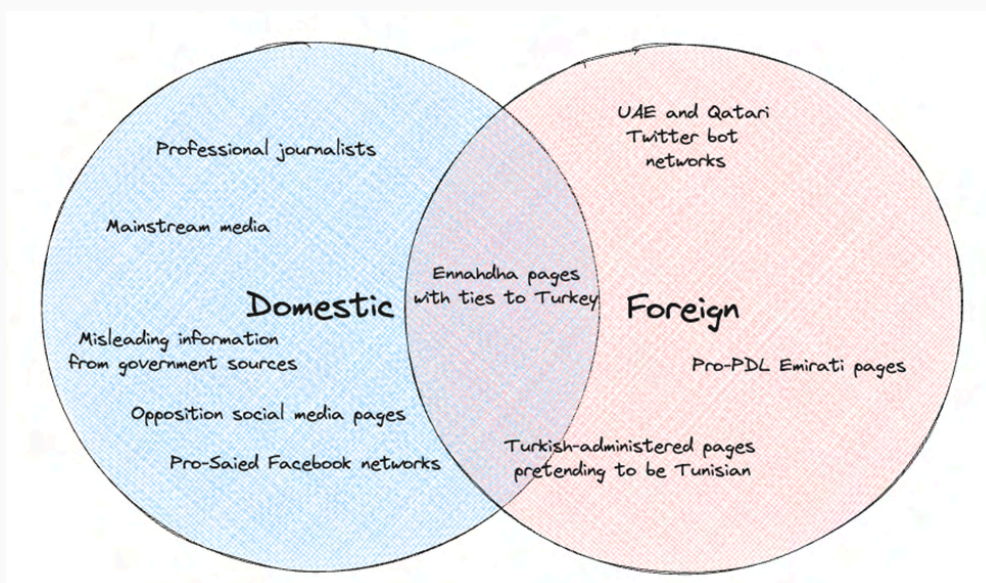
[1]https://www.amnesty.org/en/latest/news/2023/03/tunisia-presidents-racist-speech-incites-a-wave-of-violence-against-black-africans/
[1] https://www.hrw.org/news/2023/03/03/tunisia-racist-violence-targets-black-migrants-refugees and
https://www.amnesty.org/en/latest/news/2023/03/tunisia-presidents-racist-speech-incites-a-wave-of-violence-against-black-africans/

Key sources of disinformation

Misinformation and disinformation in Tunisia are often perpetuated by politically-motivated coordinated networks. These phenomena are not new; prior to the 25th of July 2021, it was alleged that every major political party had its own troll farms used to coordinate smear campaigns against political adversaries. The Islamist party Ennahdha, which dominated the political landscape before the 25th of July 2021, was associated with Instalingo, a communications agency with reported ties to Turkey. Instalingo has been implicated in coordinated inauthentic behavior, and Falso, a fact-checking organization, has identified hundreds of pages associated with it, indicating a systematic approach to spreading misinformation.

The president's faction, too, is supported by a network which has been under the scrutiny of Falso. This network, referred to as "Debbou El Mnihla", was initially unified but later split into two groups. One of these factions, according to Falso, is helmed by Naim Haj Mansour, the proprietor of the Thawra News website [1], which has been dedicated to propagating political disinformation on behalf of different political groups over the past decade; the other is a loser coalition of social media pages, also with a long history of disinformation preceding the 25th of July [2]. Falso's work has shed light on the complex web of disinformation campaigns orchestrated by various political entities in Tunisia. Strikingly, Decree 54 has never been invoked against disinformation networks aligned with the current administration.

This digital manipulation is part of a larger pattern where intelligence agencies from countries within the MENA region, engaged in geopolitical rivalries, exploit media platforms to further their interests. In the Tunisian context, narratives propagated by these campaigns often serve to benefit local political allies. For instance, disinformation traced back to the UAE has been found to support Abir Moussi's PDL party, whereas narratives from Turkish and Qatari sources tend to favor Ennahdha. For instance, Zina Mejri highlights a case where a highly active disinformation Facebook account, originating from Turkey, masqueraded as a Tunisian law professor, disseminating fabricated news that favoured Ennahdha.

[1] https://www.facebook.com/thawra.news.tn/
[2] https://www.newarab.com/news/social-media-manipulation-spikes-amid-tunisia-crisis

This strategy is indicative of a broader tactic where foreign powers engage in information warfare, attempting to project their influence onto Tunisian political dynamics by disseminating narratives that support their regional allies against their adversaries.

The issue of disinformation extends beyond the digital sphere, infiltrating traditional media outlets as well. While some may argue that strengthening these conventional platforms could enhance access to accurate information, the reality in Tunisia suggests otherwise. Traditional media has not been immune to spreading disinformation. According to a study by HAICA, Tunisia's media regulatory authority, an alarming 35% of hate speech in traditional media outlets was attributed to professional journalists, positioning them as the leading source of such rhetoric, ahead of ordinary citizens and politicians.[1] This finding underscores a significant lapse in journalistic standards, calling into question the reliability of journalists as impartial conveyors of information in the Tunisian media landscape.

35%

of hate speech in traditional media outlets was attributed to professional journalists

Misleading framing

When looking at misinformation, the communication of President Saied warrants particular attention. His approach to framing critical issues like inflation exemplifies a subtle form of misinformation. Often, President Saied authoritatively ascribes a singular cause to complex problems, typically blaming a vaguely defined opposition-mafia nexus.[1] This monocausal explanation, frequently presented without robust evidence, effectively sidesteps other plausible factors such as the war in Ukraine or monetary policies contributing to inflation.

This framing technique is not just a matter of simplifying complex issues for public consumption; it actively shapes and channels public perception in a specific direction. The President's assertions, positioned with authority and often lacking in substance, have a significant impact on how the public understands the causes of major national issues. And by amplifying and often validating the President's narratives – either directly or through a lack of critical analysis and questioning – they contribute to the spread and acceptance of these oversimplified explanations.

The consequence of this approach is a public discourse that is skewed toward a single perspective, often at the expense of a more nuanced understanding of multifaceted issues. While not disseminating disinformation in the traditional sense, this approach narrows the public's understanding of complex issues to singular, unchallenged causes, thus shaping public opinion in a way that may not fully reflect the reality of the situation.

[1] Guide Pratique : Lutter contre le discours de haine dans les medias audiovisuels, Organisation Internationale de la Francophonie, 2018, p. 103, https://haica.tn/wp-content/uploads/2020/05/Guide_Discours-haine-medias.pdf
[2] https://www.loc.gov/item/global-legal-monitor/2023-08-31/tunisia-president-calls-for-strict-enforcement-of-anti-monopoly-decree/

Responses to information disorder

Fact-checking initiatives

Fact-checking is an essential tool in combating misinformation and disinformation. In Tunisia, various initiatives have been launched to verify the accuracy of information circulating in the media and online. Many of them have emerged in response to the "infodemic" that characterised the early days of COVID-19. While some media outlets such as Business News have launched fact-checking services, civil society has been at the forefront. The journalist' union SNJT created its own fact-checking platform which is unique in that it primarily targets journalists and serves as a resource for these professionals. I Watch, the anti-corruption NGO, created I Check.

One of the most prominent platforms is Falso which boasts 32k followers on Facebook. Led by Zina Mejri, it began as a news verification initiative in the early days of the pandemic. The organization targets the general public, especially those who are more marginalized in terms of access to information and are not connected to civil society or knowledgeable about media. Falso's approach extends beyond traditional fact-checking; it also includes addressing online hate speech and fostering critical thinking skills, which they regard as a root cause of susceptibility to misinformation.

Falso's network of volunteers is a significant part of its operation. The organization set an ambitious goal to train 5,000 people in the skills of fact-checking and verification. To date, they have trained approximately 3,900 individuals, including civil society organizations, journalists, bloggers, and students. This training has led to the emergence of several other fact-checking platforms at the local level, formed by those who received training from Falso and who then joined the Tunisia Vs Disinfo consortium. These efforts have not only increased the number of fact-checkers but also fostered a broader culture of fact-checking in Tunisia, encouraging public engagement with the process of verifying information.

The limitations of fact-checking

Mehdi Jelassi of SNJT acknowledges that their platform is "ineffective because it is merely a platform, facing a considerable amount of disinformation". Reach is a key factor of success. Fact-checking works best when it reaches the same audience as the misinformation it aims to counter, which is not always the case. This is why both SNJT and Falso attempted to expand their reach by partnering with traditional media to produce fact-checking segments in popular TV and radio shows, although these partnerships have now collapsed. SNJT's partnership with the state-owned Watania TV was notably cancelled after the 25th of July 2021.

Zina Mejri notes that misinformation spreads much faster than true information, and that fact-checking often occurs only after false narrative have already circulated. But even though Falso's response time is commendable, Mejri recognises that its impact is limited by the broader challenge of combatting a prevailing mentality that, according to her, favours misinformation. She observes that the public's reaction to fact-checking is often dictated by whether the facts align with their beliefs or not.

Establishing trust and credibility is a major challenge for fact-checkers. Mejri explains that even when Falso fact-checks across the political spectrum, including its allies, it struggles to convince those who perceive it as aligned with certain factions. This highlights a key limitation: the perception of bias, whether real or imagined, can undermine the effectiveness of fact-checking efforts, regardless of their impartiality or accuracy.

Polarisation, a key driver of information disorder

Often regarded as a by-product of mis- and disinformation, polarisation is also a key driver of information disorder. The relationship between mis- and disinformation and polarisation is mutually reinforcing, the latter strongly shaping the ways in which mis- and disinformation is perceived.

Polarisation, which is characterised by an increasing divide in viewpoints and ideologies, significantly contributes to the spread of misinformation and hate speech. Polarisation often creates environments where echo chambers and homophily, i.e. the tendency of individuals to associate with others who subscribe to similar views, are prevalent. According to the research by Osmundsen, Petersen, and Bor (2021) and Mihailidis (2018), factors like antagonism, intolerance, partisanship, and homophily are closely linked to the susceptibility of individuals and communities to misinformation and harmful communication practices. These factors contribute to an environment where critical thinking and open dialogue are replaced by rigid adherence to group ideologies, making people more prone to accept and spread misinformation when it conforms to their worldview and undermines their adversaries.

This has profound implications regarding the effectiveness of responses to information disorder, notably fact-checking. There is a risk that fact-checking, while well-intentioned, can sometimes be counter-productive. In certain cases, it may inadvertently amplify the false narrative it seeks to debunk. In highly polarised environments, individuals who are deeply committed to a particular worldview may dismiss fact-checking efforts as biased or untrustworthy, especially if those efforts contradict their beliefs or if the fact-checkers are perceived as aligned with an antagonist group.

What kind of media literacy?

Media literacy offers the possibility of overcoming the limitations of fact-checking, especially when media literacy approaches take into consideration the complexity of the current media environment and its polarised structure.

Static media literacy

Static media literacy refers to traditional approaches to media education that often lack the dynamism needed to adapt to the rapidly evolving digital media landscape. These approaches are characterised by their relatively fixed methodologies and content, which may not adequately address the complexities of contemporary media consumption and creation. Static media literacy typically involves teaching set principles and skills that are not necessarily responsive to the changing nature of media or the diverse experiences of media consumers.

Protectionist approaches to media literacy are a classic example of static media literacy. These methods focus on safeguarding individuals, particularly young people, from potentially harmful media content. This approach operates under the assumption that by limiting exposure to certain types of media, individuals can be protected from misinformation or negative influences. However, this method's static nature lies in its often one-dimensional view of media interaction. It tends to overlook the reality that media consumption is an active, interpretive process where individuals engage with a variety of content in different contexts. By focusing predominantly on shielding individuals, protectionist approaches may fail to equip them with the skills to critically analyse and navigate the complexities of the media they inevitably encounter.

Skills-based approaches, another facet of static media literacy, concentrate on equipping individuals with the technical skills for media creation and consumption. This might include teaching how to discern credible sources, understand media messages, and create digital content. While these skills are undoubtedly valuable, the approach can be static when it focuses solely on skill acquisition without fostering a deeper understanding of the media's role in society, the polarisation dynamics underpinning information disorder, and the individual's role as an active media participant.

Dynamic media literacy

Civic Media Literacy and Practice (CMLP) [1], in contrast, embodies a dynamic and inclusive approach to media literacy that actively involves the audience in various aspects of media engagement. Firstly, it encourages the audience's active participation, not just as consumers but as contributors. This engagement can manifest in different forms: interacting with content and its creators, contributing ideas for content, or participating in the media production process. By fostering a 'prosumer' experience, where the audience actively contributes to media production, CMLP blurs the traditional lines between producers and consumers of media.

A key aspect of CMLP is its promotion of a horizontal relationship between the media and its audience. In this model, the audience is not just a passive recipient of information but has a sense of ownership over the media. The media, in turn, engages in a dialogue with its audience rather than adopting a lecturing stance. This reciprocal interaction encourages a more democratic and participatory media environment, where audience feedback and perspectives shape media content and presentation.

[1] Habib M. Sayah, 'Civic intentionality first: a Tunisian attempt creating social infrastructure for youth representation,' in The Palgrave Handbook on Media Misinformation, eds. Karen Fowler-Watt and Julian McDougall, 2022.

CMLP is inherently inclusive, providing a platform for diverse viewpoints and people from various backgrounds, interests, and ideologies. It fosters mutual understanding through interaction and dialogue, underpinned by a caring ethic that encourages empathy for different, even antagonistic, viewpoints. This inclusiveness is crucial in creating a media landscape that reflects a wide range of experiences and perspectives, thus promoting a more comprehensive and nuanced understanding of issues.

By facilitating active engagement, fostering a horizontal relationship between media and audience, and promoting inclusiveness and empathy, CMLP directly addresses issues of polarisation and misinformation. It undermines misinformation by encouraging critical engagement with media content, fostering a culture of questioning and verification. The inclusive nature of CMLP, which brings together diverse viewpoints, helps break down echo chambers and filter bubbles that often reinforce misinformation. By promoting understanding and empathy among individuals with differing views, CMLP combats the divisiveness that misinformation and polarisation thrive on. This approach not only fosters a more informed public but also a more cohesive one, where dialogue and understanding bridge the gaps created by misinformation and polarised narratives.

Boubli: best practices in media literacy

Traditional media, including associative radios, typically engage in a vertical, one-way relationship with their audience, characteristic of mass media. This approach is often superficial, lacking deep audience interaction or participation. In contrast, alternative digital media like QLM and Deep Confessions, despite currently lacking systematic audience engagement, recognise the need for deeper involvement. These platforms show potential for aligning more closely with Civic Media Literacy and Practice (CMLP) by fostering interactive, two-way communication, where the audience plays a more active role in content creation and dialogue. There is, however, in the Tunisian media landscape that more closely embodies CMLP.

The approaches of the alternative media Boubli exemplify dynamic media literacy in several key ways.[1] First, Boubli's operational framework aligns with Civic Media Literacy and Practice (CMLP), emphasizing action to change the media environment rather than simply interpreting it. Boubli positions itself as alternative media, challenging the norms of youth media representation in Tunisia. This transformative agenda is a deliberate system-level intervention, demonstrating a proactive stance towards media reform and representation.

As a youth-led digital media platform operating on multiple social media channels, Boubli embodies the spirit of disruption. Its name, which translates to a commotion often caused by conflicting views, reflects its mission to empower particularly marginalised young people. Boubli aims to disrupt the media landscape by challenging dominant narratives and stereotypical representations of youth through innovative content. This mission is rooted in a desire to foster resilience among young people.

Boubli's editorial policy further highlights its dynamic approach to media literacy. The platform rejects paternalistic media models and refuses to promote elite views, including those of its production team. Instead, its primary mission is to amplify the voices of marginalised young people. This approach emphasises empathy with the audience and avoids a didactic or lecturing tone, which is often a feature of more static media literacy methods.

[1]Sayah, Habib (2022), op. cit.

Boubli's Discord server, a unique feature in the Tunisian media ecosystem, is a platform gathering nearly 30,000 core members of this media's audience. It is arguably the only space serving as an agora for young Tunisians from all backgrounds. The production team hosts weekly interactive audio discussions with the public, while any member of the public may also initiate such audio debates. During these shows, production staff, audience members, subject-matter experts, activists, and politicians discuss a variety of topics on an equal footing. This format allows for diverse perspectives to be shared and debated, promoting an understanding of differing viewpoints. It's an environment where participants can engage in meaningful dialogue, facilitating empathy and reducing the likelihood of polarization.

Boubli places a high value on convening people and engaging with them in interactive online forums, which is central to its practice. This approach involves participatory deliberations with the community, leading to increased responsiveness and a degree of shared ownership over the media platform. By involving its audience in decision-making processes and content creation, Boubli creates a sense of belonging and investment among its community members. This inclusive and participatory model encourages empathy among participants, as they are exposed to and can engage with a variety of perspectives.

Lastly, Boubli actively involves its audience in content creation and decision-making. It collects stories from audience members across the country, invites feedback on show previews, and allows audience members to submit their own show concepts. This involvement extends to governance, with community members taking on roles like moderators. Boubli prioritizes community input in recruiting volunteers, interns, and staff members, and provides training upon recruitment. This inclusive approach fosters a dynamic, participatory media environment, contrasting with traditional, top-down media structures.

MOVING FORWARD

1 Support community-based media initiatives

Offer continued support to associative radios

Continued support for associative radios is pivotal. Despite challenges in adapting to trends in digital media consumption and in engaging the youth, these radios hold a unique place in providing hyper-local news in underserved regions. They can foster community cohesion and resilience by being integral to local storytelling infrastructure.

Most importantly, in Tunisia's re-configured political system, which is now characterised by bottom-up processes which start at the hyper-local scale, the role of associative radios in enhancing political participation cannot be overstated. In the new institutional framework which relies heavily on elected local councils – from which one of the chambers of parliament emanates – the centre of gravity of the political system has moved closer to the local level and coverage of local affairs has become key to stimulating political participation. The role of associative radios is all the more so important as national media outlets have re-allocated their scarce resources away from local news and are laying off local correspondents.

Nonetheless, it is important to recognise that associative radios are facing a critical crossroads. Mere support alone won't suffice; they must undertake a comprehensive overhaul of their antiquated operating models to modernise and ensure their survival in the face of current challenges.

2 Modernising associative radios

It should be recognised that associative radios, in their enthusiasm to mirror conventional broadcasting, risk resembling mass media too closely, which dilutes their unique local mission. Indeed, in their zeal to emulate established radio frameworks, associative radios might inadvertently adopt a top-down approach characteristic of traditional media. This replication manifests in their style, their content, their tendency to rely on volunteers from the mainstream radio sector, and their audience engagement approaches, overshadowing the grassroots ethos that is supposed to be their hallmark.

To preserve their essence and maximise their local impact, these radios would benefit from distinguishing themselves from mass media by fostering a more intimate, community-focused model of broadcasting. To flourish and truly serve their communities, these radios need to pivot toward participatory models and audience-centric approaches. Internews' support should focus on enhancing their capacity to engage with audiences through more direct dialogue and interactive content.

While broadcast radio consumption has experienced a notable decline among younger generations, it remains an important source of information for senior citizens. To bridge this generational gap, associative radios face the challenge of appealing to both audiences effectively.

Broadcasting on radio waves should continue, provided that economic viability is ensured, taking into account the challenges posed by relatively high broadcasting fees and operating costs. However, it is important to prioritise engaging young people particularly because they are less likely to participate in elections. To do so, it is essential for associative radios to invest in digitisation and to leverage social media to capture the attention of younger demographics.

This transformation cannot be limited to merely cross-publishing radio content on social media platforms. To succeed, they must fully embrace the digital era by adopting the language and formats of social media, including native forms of social media content such as reels and other short-form videos, as well as aligning with the prevailing digital trends in terms of tone and style. This comprehensive approach will enable associative radios to remain relevant and influential in an evolving media landscape.

3 Fostering innovation in alternative media

Supporting the development of associative radios is vital, but, recognising their limited reach and scope, Internews' strategy should expand to include alternative digital media which represent the most dynamic segment of the media landscape. This shift in focus would also resonate with the public's growing disillusionment with traditional journalism and their disaffection for conventional political content and party politics.

An alternative media incubation programme

An effective strategy would be to initiate a media incubation programme that nurtures alternative media ventures, particularly those with civic aims and a commitment to pluralism. This programme would offer resources, mentorship, and funding to aid innovation and foster the development of grassroots initiatives in a nurturing environment.

In doing so, it is particularly important to empower marginalised youth, who are often excluded or misrepresented by the mainstream media. Enhancing their access to communication resources will strengthen their ability to self-represent and break through the barriers of media production as well as political participation.

The incubation approach and Internews' choice of beneficiaries should also take into account (i) the rising demand for non-conventional content that doesn't strictly adhere to political norms or traditional journalistic formats, and (ii) help innovative media actors navigate the increasingly restrictive environment, (iii) while meaningfully enabling political participation.

Innovative media models

In response to the restrictive environment, support should pivot to innovative media models that navigate these challenges effectively. Media outlets like QLM or Boubli, which engage young people in critical discussions on fundamental societal issues such as culture, economics, infrastructure, health or the environment, are notable models. These outlets shift the focus from divisive party politics to a substantive engagement with policy matters, enabling the public to critically evaluate different policy options based on their merits, while steering clear from risks of political retaliation.

Support should also be provided to creative projects that leverage art, music, and digital storytelling. These mediums can provide nuanced political commentary and foster debate, offering a subtle but potent form of engagement with underlying societal issues, minimising risks in a climate constrained by policies like Decree 54.

To broaden the impact of media development, Internews' initiatives could extend beyond conventional media to encompass the vibrant intersection of "media arts". This expansion would not be limited to traditional or self-identified media entities but would also embrace a diverse spectrum of creative expression that engages, educates, and resonates with audiences.

Such inclusivity would mean opening doors to digital collectives, individual content creators, and platforms that wield cultural influence and foster trust, even if they don't conform to the standard definition of 'media'. This could encompass a rich variety of outputs, from educational series to satirical commentary, and embrace various formats including but not limited to podcasts, documentaries, animated shorts, comedy skits, musical compositions, and visually-driven storytelling through short films and digital art installations, on platforms as diverse as TikTok and Twitch.

4 Economic viability

The Tunisian media landscape is grappling with economic sustainability, a challenge intensified for associative and alternative media due to potential restrictions on foreign funding and the lack of public financial support. To combat this, a media accelerator programme could be the key, offering access to experts in the creative economy and guiding media outlets to discover innovative economic models. This could range from capitalising on digital marketing trends to exploring Middle Eastern markets, engaging the diaspora for support, or leveraging crowdfunding initiatives.

Particular focus is needed on associative radios which encounter high costs, like licensing and broadcasting fees, especially in economically disadvantaged areas where generating ad revenue is particularly challenging.

The primary goal of the accelerator would be to nurture self-reliance through innovative monetisation strategies and diversification of revenue streams. However, acknowledging the immediate financial challenges, the programme should also consider providing direct support. This could take the form of core funding or specific subsidies, such as covering licensing fees for associative radios, ensuring these outlets can sustain operations while they transition to more sustainable business models. This dual approach would secure the necessary runway for media outlets to innovate, experiment, and eventually achieve financial independence.

Additionally, donors and media development actors should (i) closely monitor threats to foreign funding, (i) develop contingency plans in place in consultation with local partners in case foreign funding of associations is banned or restricted, and (iii) be open to funding for-profit entities as civic and media initiatives are increasingly registering as companies rather than associations to circumvent legal risks.

5 Legal challenges

In response to the restrictive environment shaped by policies such as Decree 54, Internews can implement several strategic solutions to assist media actors in Tunisia. This can possibly be done in partnership with other relevant stakeholders such as SNJT, Reporters Sans Frontières, and Avocats Sans Frontières.

Internews should establish a comprehensive legal education programme for media actors. This programme would provide training on current media laws, including Decree 54, and offer practical guidance on how to report within the legal confines. Additionally, creating a repository of resources, such as easy-to-understand legal guides and case studies, could empower media actors - including non-journalists who are more vulnerable, less knowledgeable about media laws, and do not benefit from SNJT's full protection - with the knowledge to navigate the restrictive environment more safely.

Internews may also set up a network of local and international legal experts who can offer pro bono services to media actors facing legal challenges. This network would not only offer immediate legal assistance but also work on building long-term defence strategies. Internews can facilitate workshops to connect media professionals with these legal experts, ensuring that journalists and content creators have access to legal support when they need it.

6 Media literacy

To effectively address mis- and disinformation, it is crucial to recognise the limitations of traditional fact-checking initiatives, which can be counterproductive in polarised media environments, and of static media literacy approaches, which often adopt a top-down approach in educating the public.

Instead, the focus should shift towards approaches founded on the principles of Civic Media Literacy and Practice. Such approaches address deeper drivers of information disorder, such as polarisation, alienation, misrepresentation, and marginalisation, which are often neglected by conventional media literacy methods.

Recent research into media literacy underscores that the most effective methods involve participatory content creation and interaction/dialogue between active publics and media. These approaches foster a culture of critical discussion about media content, promoting criticality and accountability. New Tunisian platforms like QLM and Boubli exemplify how engaging audiences in active dialogue and content co-creation can lead to more profound and impactful media literacy. By encouraging critical engagement with media, these models demonstrate a shift away from merely imparting knowledge and skills towards fostering a more interactive and critical media landscape. This participatory approach is key to building a more informed, engaged, and critically thinking audience. Importantly, participatory media approaches that are underpinned by an ethos of pluralisation may generate mutual understanding and empathy across polarised audiences.

7 Improved representation for alternative media actors

In Tunisia, alternative media actors and individual content creators outside the formal journalism sphere face heightened legal and political vulnerabilities due to inadequate policy representation. This lack of a collective voice leaves them less equipped to safeguard their interests. While RUTMA is making strides for associative radios, their scope is narrow. Broadening the advocacy model could be advantageous, either by expanding RUTMA's remit, which is unlikely, or more feasibly, by forming a new representative body. Such an organisation could also be established within existing business and entrepreneur associations like UTICA or CONECT, serving as a syndicate for the interests of content creators and alternative digital media, thus strengthening their position in policy discourse and their political capital.

8 Donor visibility

In the current polarised climate, associations and media outlets have become targets of intimidation and smear campaigns, which sometimes influence policy decisions, as seen in the xenophobic narratives impacting migration policy. Currently, hostilities are focusing on associations and recipients of foreign funding, in the form of conspiracy theories painting these actors as foreign agents threatening national sovereignty.

As part of their do-no-harm policy, donors should re-consider high-visibility branding requirements – especially when they require partner media outlets to associate their content with the donor's brand. Not only do these practices reduce the perceived agency of local partners but they increase their vulnerability to reputational and political risks. Nevertheless, this caution should not preclude transparent communication about funding, which is essential for maintaining public trust.

9 Research

Continued research into Tunisia's media ecosystem is required to fill existing knowledge gaps and guide effective media development. It is essential to generate up-to-date primary data regarding media consumption habits (not limited to sources of political information), focusing not only on traditional sources but also on digital media. This should include detailed analysis of digital media usage, drivers of trust in and consumption of various online sources, representation of marginalised groups and women across such sources, and the expectations of media consumers.

Equally important is a thorough investigation into mis- and disinformation, involving a comprehensive mapping of disinformation sources and an investigation media users' attitudes and responses to such content. This should be complemented by an updated study of Tunisia's networked public sphere to shed light on audience fragmentation, identify polarised clusters and echo chambers, and analyse their susceptibility to mis- and disinformation and hate speech. Key research questions could include (i) whether and to what extent polarisation fosters mis- and disinformation, (ii) whether polarisation affects receptiveness to fact-checking.

Finally, there is a pressing need for research into the economic viability of the digital media and creative economy sectors. Most existing studies focus on traditional media, leaving a gap in understanding the financial sustainability of digital alternative media. Such insights are crucial for developing strategies to enhance the economic resilience of these burgeoning sectors.