Addressed to: **European Commission**

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The document was signed using qualified electronic signatures.

**Opinion of stakeholders**
27 September 2024

Subject: Draft Law No. XIVP 3481(2) amending Articles 2, 10, 10(3), 21 and 29(2) of Law No IX-325 of the Gaming Law of the Republic of Lithuania

On 3 July 2024 Lithuanian state authorities, namely Lithuanian Standards Board (*Lietuvos standartizacijos departamentas*) and Ministry of Finance of Lithuania (*Lietuvos Respublikos finansų ministerija*) notified the European Commission of Draft Law No XIVP 3481(2) amending Articles 2, 10, 10(3), 21 and 29(2) of Law No IX-325 of the Gaming Law of the Republic of Lithuania (**Draft law**). The reference EU law is Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services (**Directive 2015/1535**).

The stakeholders express their grounded doubts as regards the effect and legitimacy of restriction at issue on information society services. Namely, **the measure envisaged may create obstacles to the free movement of services which is established in Article 56 of the Treaty on the Functioning of the European Union (TFEU)**. In particular, national measures must comply with the principle of proportionality under EU law, which is fundamentally violated in this case.

The stakeholders therefore kindly request the European Commission (**Commission**) to deliver a detailed opinion to the effect that the measure envisaged may create obstacles to the free movement of services which would obligate the Republic of Lithuania (as a Member State) to postpone for additional four months the adoption of the Draft law (as a draft rule on services).

The request is substantiated in detail below.

## 1. Legal conditions for restrictions on the free movement of services

The legislation (Draft law) gives rise to a restriction of the freedom to provide services enshrined in Article 56 of the TFEU (ex-Article 49 TEC). This is also confirmed by the Member State itself (respectfully, Republic of Lithuania) when notifying the Commission under the Directive 2015/1535.

The restriction being considered in Lithuania involves a total ban of gambling advertising (total ban comes into effect on December 31, 2027).

As interpreted by Court of Justice of the European Union (**CJEU**), the Member States are free to set the objectives of their policy on betting and gambling and, where appropriate, to define in detail the level of protection sought. However, the restrictive measures that they impose must satisfy the conditions laid down in the case-law of the Court **<u>as regards their proportionality</u>**[1].

It is thus necessary to examine in particular whether the restriction imposed by the national legislation is suitable for achieving the objective or objectives invoked by the Member State concerned, and whether it does not go beyond what is necessary in order to achieve those objectives. In any event, those restrictions must be applied without discrimination[2]. In that context, it must be recalled that national legislation is appropriate for ensuring attainment of the objective pursued only if it genuinely reflects a concern to attain it in a consistent and systematic manner[3].

## 2. Importance of gambling advertising services in Lithuania for media sector

Despite being highly regulated and allowing advertising only in exceptional cases and with strictly limited content, gambling advertising plays a crucial role in subsidizing sports and cultural activities, as evidenced by its significant contribution to the revenue streams of various media and event organisations. In the context of Lithuania, gambling advertisements form a substantial part of the annual income for media outlets.

Current media companies' landscape, that includes TV channels, national news portals, radio stations is self-sufficient, in particular due to the possibility of gambling advertising. Gambling advertisements are a significant source of income for media companies, enabling them to provide content to audiences for free and in convenient formats. In some media outlets, gambling ads account for 5% to 25% of annual revenue. These revenues allow media companies to provide free or low-cost access to content, including sports broadcasts and cultural programs. Without these advertisements, the financial stability of these organizations would be at risk, potentially leading to reduced accessibility to free content for the general public.

The gross expenditure in EUR for gambling advertising, adjusted for the average media channel discounts provided by advertising experts is summarised in the following table.

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[1] Case C-42/07 Liga Portuguesa de Futebol, Judgment of the CJEU (Grand Chamber) 8 September 2009, para. 59.
[2] Case C-42/07 Liga Portuguesa de Futebol, Judgment of the CJEU (Grand Chamber) 8 September 2009, para. 60.
[3] Case C-42/07 Liga Portuguesa de Futebol, Judgment of the CJEU (Grand Chamber) 8 September 2009, para. 60.

| Media type | 2021 | 2022 | 2023 |
|---|---|---|---|
| Internet | 5,351,243 | 2,921,516 | 4,735,511 |
| Cinema | 3,531 | 13,993 | 50,331 |
| Newspapers | 632 | 636 | 711 |
| Outside advertising | 24,104 | 61,186 | 262,809 |
| Radio | 190,065 | 165,368 | 132,698 |
| TV | 5,716,983 | 8,783,546 | 9,410,550 |
| Journals | 1,302 | 2,032 | 2,400 |
| Total: | 11,287,861 | 11,948,278 | 14,595,009 |

***Table 1.*** *The gross expenditure in EUR for gambling advertising in Lithuania. Based on Kantar survey.*

Besides, the sports sector heavily relies on sponsorships from gambling companies. These sponsorships are not merely about commercial gain. They are deeply integrated into the financial ecosystem of sports organisations. Gambling companies provide stable and significant funding to sports leagues, teams, and events, which is crucial for their operations and development. This funding enables sports organisations to plan long-term, secure contracts with athletes, and invest in necessary infrastructure and resources.

## 3. The essence of the proposed ban

The restriction being considered in Lithuania involves a total ban of gambling advertising (total ban comes into effect on December 31, 2027). Although the proposed legislation aims to eliminate association between gambling companies and public events, potentially leading to significant financial losses for sectors that rely on such sponsorships, it would leave gambling companies the possibility to advertise themselves by directly funding sports clubs, sports organizations that will be using their logos and names. This ban will still allow gambling companies to be visible as providing financial support to sports teams, leagues, or cultural events. In this context, the ban would, however, directly and heavily affect media outlets (by limiting their possibilities to advertise gambling activities), still maintaining the possibility to gambling companies to remain visible in sports and cultural events as sponsors. In this respect, on the one hand, the possibility of displaying gambling companies' logos and making them visible to the public, is remained and on the other hand, the prohibition of a particular sector (media) from generating income or additional benefits (sponsorship of broadcasts).

## 4. The negative effect of the Draft law on information society and infringement of the conditions as regards the proportionality

Supporting the proposed amendments to ban gambling advertising would not only substantially reduce media revenue but also significantly undermine the stability and independence of media companies. The restriction imposed by the national legislation is not suitable for achieving the objectives invoked by the Member State concerned, and it does go far beyond what is necessary in order to achieve those objectives. Furthermore, by failing to achieve its objectives it will cause additional harm.

In our view, the Draft law is unsubstantiated and should be returned for further deliberation by legislative authorities based on three key points. **First**, the Draft law negatively impacts media pluralism, which is one of the core values of the EU. **Second**, the adoption of the Draft law lacked assessment of the necessity for such interference in the activities of media companies, disregarding alternative legislative proposals and by undermining the principle of proportionality of the interference. **Third**, the Draft law creates barriers to entry in the already highly concentrated Lithuanian media market, a situation exacerbated by the continuous increase in the state funded media (public service) company (the Lithuanian Radio and Television – **LRT**) funding.

### 4.1. Negative effect on media pluralism

Media freedom and pluralism is among the main pillars of the EU. It is explicitly prescribed by Article 11 § 2 of the Fundamental Charter of the EU that '[t]he freedom and pluralism of the media shall be respected'. The EU has taken numerous steps to ensure media pluralism within the EU. One of the most important steps in this regard is the Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (**the European Media Freedom Act**). The ban at issue would most affect independent and self-sustaining media in the country – national TV channels, national news portals, and radio stations. Additionally, less profitable media outlets would face significant financial difficulties.

The effect of the ban of gambling advertising on media pluralism is manifest from the standpoint of the general media status in Lithuania and distinct media companies. Media pluralism is affected by funding (be it revenues or subsidies from the state) on the funding. According to experts, Lithuania is among the countries that face difficulties in 'a systematic lack of funding' for local journalism – 'surviving in the market is still very difficult, especially for small media outlets', according to the Reporters Without Borders [4].

Media Pluralism Monitor General Report 2024[5] assesses market plurality as an area that considers the economic dimension of media pluralism. The market plurality area assesses the risks resulting from the opacity of media ownership, from the concentration of the market, from the economic sustainability of the media, and the influence of commercial interests and ownership on editorial content.

According to Media Pluralism Monitor 2024 Report on Lithuania,[6] market plurality area in Lithuania in 2023 was at high risk. Analysis of digital environment pluralism indicators shows similar trends to those in the conventional news media

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[4] Reporters Without Borders. Lithuania. Available at: https://rsf.org/en/country/lithuania.

[5] Bleyer-Simon, Konrad, Da Costa Leite Borges, Danielle, Brogi, Elda, Carlini, Roberta, Kermer, Jan Erik, Palmer, Marie, Parcu, Pier Luigi, Reviglio Della Venaria, Urbano, Trevisan, Matteo, Verza, Sofia, Žuffová, Mária. *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Member States and in Candidate Countries in 2023.* EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2024. Country Report. Available at: https://hdl.handle.net/1814/77028.

[6] Jastramskis, Deimantas, Balčytienė, Auksė. *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Member States and in Candidate Countries in 2023. Country Report: Lithuania.* EUI, RSC, Research Project Report, Centre for Media Pluralism and Media Freedom (CMPF), 2024. Country Reports. Available at: https://hdl.handle.net/1814/77008.

environment. The area of market plurality generates the highest ranking among all other risk areas hat ensure media pluralism.[7] The magnitude of this risk is mainly determined by the high concentration of media markets, the dominance of global corporations in the local Internet advertising market, the pressure of commercial interests of private media on news services and the low subsidization of private media from the state budget.[8]

The Media Pluralism Monitor experts recommend that the media system's viability be enhanced by increasing direct subsidies to private media entities, ensuring their independence is preserved. Additionally, regulations and tailored measures should be established to prevent the concentration of media ownership.[9] The ban at issue is an opposite step from what is recommended – it will only increase concentration of the media market.

The Draft law would determine even more concentration. A study on the level of horizontal concentration in Lithuanian media markets revealed that, in the absence of specific regulations to control media concentration, all four revenue markets – television, radio, internet news websites, and newspapers – have become highly concentrated. In terms of audience (circulation) concentration, the newspaper and television markets were found to range from unconcentrated to moderately concentrated, the radio audience was moderately concentrated, and internet news websites showed a high level of concentration.[10]

Privately funded media companies, which receive minimal subsidies, are in need of even greater support. The situation could become critical if the Draft law is passed. For instance, cultural media outlets heavily rely on state subsidies. Recently, the Media Support Fund (*Medijų rėmimo fondas*) was established to streamline and ensure the transparency of media funding. However, the transition from the previous funding body to the Media Support Fund caused temporary issues, leaving cultural media outlets without funding for several months. Some even faced potential closure due to the lack of state support. This already precarious situation would be further exacerbated if the Draft law is adopted, as it would eliminate one of the alternative sources of media funding.

Banning gambling companies from, among other things, sponsoring broadcasts of certain events will reduce the public's ability to watch them for free even on big commercial media channels. For example, this year's UEFA EURO 2024 broadcasts were available for free to Lithuanian viewers on a commercial free-to-air TV channel[11] because the broadcasts were sponsored by the gambling company "7bet". Otherwise, the commercial broadcaster would not have been able to buy the expensive broadcasting rights and (i) the Lithuanian population would either not have been able to watch the event or (ii) would have been forced to watch it on paid platforms (pay-per-view, pay-tv or charged by other forms of paid content).

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[7] Ibid., p. 10.
[8] Ibid., p. 14.
[9] Ibid. p. 23.
[10] Jastramskis, Deimantas, Plepytė-Davidavičienė, Giedrė. Audience and Revenue Concentration in Lithuanian Media Markets (2008–2019). *Information & Media*, vol. 93, 2022, pp. 176–191. DOI: https://doi.org/10.15388/Im.2021.91.55.
[11] https://www.vz.lt/rinkodara/medijos/2024/05/09/europos-futbolo-cempionata-transliuos-tv3-ziniasklaidos-grupe

Considering the high concentration in the media market and the limited funding available to media companies in Lithuania, the Draft law would further restrict the voices of private media outlets. The significant revenue provided by gambling advertising serves as an alternative means to keep private media competitive and the market functioning. Without this funding, it will be far more challenging to maintain media pluralism.

### 4.2. Disproportionate measure that was not envisaged by the lawmaker

The ban may negatively affect free provision of information society services as disproportionally affecting media pluralism in Lithuania. Article 21 of the Regulation (EU) 2024/1083 (**the European Media Freedom Act**) prescribes that '[l]egislative, regulatory or administrative measures taken by a Member State that are liable to affect media pluralism or the editorial independence of media service providers operating in the internal market shall be duly justified and proportionate. Such measures shall be reasoned, transparent, objective and non-discriminatory.' Completely banning gambling advertising may significantly undermine media pluralism, which is a fundamental value under the European Union law and the European Media Freedom Act, in particular.

It should be noted that gambling advertising is already banned in Lithuania, with some minimal exceptions. The legal framework already in force today is very strict and ensures sufficient protection of individuals' rights. Article 9 paras 9 to $9^2$ of the Law on Gambling of the Republic of Lithuania reads as follows:

*"9. It shall be prohibited to advertise gambling on the territory of the Republic of Lithuania, except for the names, trademarks and types of gambling organised by the companies organising the gambling. It shall be prohibited to publish any information relating to gambling on websites intended for persons under the age of 18. A website aimed at persons under 18 years of age shall be deemed to be a website where at least 4/5 of the content is devoted to the description of events and phenomena aimed at children and adolescents, to their professional evaluation, to the provision of information about them, and to the promotion of children's and adolescents' artistic and technical creativity.*

*$9^1$. Any additional written, visual or aural information shall not be included in the advertising referred to in paragraph 9 of this Article.*

*$9^2$. The advertisements referred to in paragraph 9 of this Article shall contain a warning that participation in gambling may lead to gambling addiction or pathological gambling craving. The content of the warning message and the rules governing its presentation in advertising shall be determined by the Supervisory Authority."*[12]

Considering Article 21 of the European Media Freedom Act, it is obligatory for Member States to ensure that, among other, legislative measures that are liable to affect media pluralism of media service providers operating in the internal market shall be duly justified and proportionate. The European Media Freedom Act seeks to safeguard the independence and pluralism of the media across the EU. By banning gambling advertisements, the proposed amendments would disproportionately affect smaller and independent media outlets, potentially leading to reduced financial

[12] https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.133562/asr

viability, market concentration, and diminished plurality of voices in the public sphere. Consequently, such a ban risks undermining the very pluralism that EU law aims to protect.

For example, consider a small, independent national news portal that currently derives 20% of its annual revenue from gambling advertisements. This income supports the portal’s operations, including hiring journalists and producing diverse content. The proposed ban on gambling advertising would deprive the portal of a significant revenue source. As a result, it may be forced to reduce its staff, limit investigative journalism, or potentially close. Larger media conglomerates, with diversified income streams, would be less affected by the measure.

This outcome risks creating a media market concentration, where smaller outlets struggle to compete, leading to a reduction of competing views and the diversity of voices. As media pluralism is defined by access to a variety of media services that reflect diverse opinions, such a concentration would significantly impact the pluralism and editorial independence of media service providers in the internal market, as highlighted by the European Media Freedom Act. This negative consequence may not comply with the principle of proportionality outlined in Article 21 of the European Media Freedom Act. Moreover, such a measure could hinder the freedom to provide services in the media sector, affecting the formation of public opinion and diminishing the diversity of perspectives, to the detriment of a democratic society.

The complete ban on gambling advertising in Lithuania was adopted without proper consideration of the proportionality of the restriction, as required under EU law, particularly Article 21 of the European Media Freedom Act. The lack of analysis by the Lithuanian Parliament regarding the necessity of the ban, especially in relation to media pluralism and financial stability, raises concerns about its justification. The European Media Freedom Act mandates that any legislative measure affecting media pluralism must be proportionate, transparent, and non-discriminatory. However, the blanket ban on gambling advertisements disproportionately impacts independent and self-sustaining media outlets, which rely heavily on such advertising for their financial survival. This restriction, by undermining the economic foundation of these outlets, could lead to a reduction in diverse media voices, directly conflicting with the EU's goals of promoting media pluralism.

The economic landscape of Lithuania’s media sector, as outlined in reports like the Media Pluralism Monitor, underscores the precarious position of smaller and independent outlets. With gambling advertisements contributing between 5% and 25% of annual revenue for many of these media organizations, the ban poses a significant threat to their viability. The absence of an in-depth analysis by the Lithuanian Parliament as to whether such a drastic measure is necessary or proportionate shows a disregard for the potential consequences on media pluralism.

While considering the proposed ban on gambling advertising the lawmaker disregarded potential alternatives that may ensure the goal with less interference. The media companies accept and support the goal of the lawmaker that grounds the amendment of the Draft law. Namely, ‘to increase the protection of those involved in gambling from the negative effects of advertising, especially on the most vulnerable groups in society, as well as irresponsible involvement in gambling and excessive spending on gambling'[13]. However, the adoption of the ban disregarded any alternative measures that may be used as means to achieve the same goal with less intrusive effect.

It is worth noting that although the Draft law initially proposed a complete ban on all gambling advertisements in Lithuania, the Government submitted its opinion recommending against a total ban. Instead of a full ban, the Government advocated tightening the regulatory framework by banning only the most harmful categories of gambling advertisements (for instance, casino advertisements) – a model widely supported by all interest groups, including media organizations. However, the Parliamentary Committee on Budget and Finance ignored the Government's opinion and recommendations and, during a meeting, decided to implement a full ban on gambling advertisements, effective from 1 January 2028, with a transitional period leading up to that date.

Media companies and other stakeholders were not given the opportunity to review the Committee's draft conclusions either before or during the meeting. Consequently, when an updated version of the Draft law was registered, it became clear that the Parliamentary Committee's decision also imposed a *de facto* ban on gambling advertisements on television, limiting them to one or two per hour, with each advertisement not exceeding 20 seconds. This effectively resulted in a discriminatory ban, meaning that media organizations could not benefit from the promised transitional period.

In addition to the current Draft law, several other proposals aiming to tighten gambling regulations are registered both in the Lithuanian Parliament and Government. Some initiatives also suggest alternative proposals for banning gambling advertisements.

For example, the Ministry of Finance proposed stricter rules for the content of gambling advertisements. This includes requiring gambling operators to provide messages about problem gambling, ways to seek help, and the option to register in the list of individuals who have chosen to restrict their gambling[14]. Additionally, another draft law, registered by members of Parliament, proposes that gambling operators allocate at least 50% of their advertising budget to social campaigns[15].

Therefore, by adopting the Draft law the Parliament would fail to consider whether there were less intrusive means to achieve the same objective, as required under the principle of proportionality outlined in Article 21 of the European Media Freedom Act. While the proposed total ban on gambling advertising is intended to protect vulnerable individuals from the harms of gambling, alternative measures, such as stricter content regulations or social campaigns, were not sufficiently evaluated. As already mentioned, in the context of the very strict legal regulation already in place today, such strict additional regulation (absolute prohibition) would have to be

[13] Based on the notification provided by the authorities: https://technical-regulation-information-system.ec.europa.eu/en/notification/26043.
[14] On March 8, 2024, the Ministry of Finance registered draft law No. 24-3611 on amendments to Articles 1, 2, 73, 10, 101, 16, 203, 204, 21, 22, 23, 26, 28, 291, and 292 of the Law on Gambling No. IX-325, the addition of Articles 11 and 104, and the repeal of Article 206..
[15] On March 8, 2024, a group of members of the Seimas of the Republic of Lithuania registered draft law No. XIVP-3521 on amendments to Articles 7-3, 10, and 20 of the Law on Gambling No. IX-325.

supported by studies or convincing arguments as to what positive effect, if any, an absolute prohibition would have. By neglecting to explore less restrictive options, the Parliament disregarded the obligation to ensure that legislative measures affecting media pluralism are not only justified but also proportionate.

### 4.3. The restriction would negatively affect market entry possibilities that are amplified by growing funding for the national public broadcaster

The adoption of the Draft law would hinder the functioning of the internal market. It would further limit competition in Lithuania's media market, which is already strained by high concentration and insufficient funding. This issue is further exacerbated by the state funding of the national public service broadcaster, LRT.

LRT is funded by fixed percentages of personal income and excise tax revenues, a formula designed by lawmakers to provide stable annual budgets shielded from political influence.[16] However, during the last ten years LRT's budget has grown sharply. Its current budget now equals the total annual budget of the top four commercial media companies in Lithuania combined. LRT expanded at the cost of private media.

Next year, LRT's budget will increase to 73 million euros[17], a figure unimaginable for any private media company. LRT develops their products and makes high quality content available for free. The availability of content like that of commercial operators significantly hinders their ability to grow and expand paid access (subscription-based) models, as premium-quality content becomes freely accessible to everyone. This issue is especially pressing for online businesses, which have long tried to reduce their reliance on advertising revenue and convince audiences to pay for subscriptions. Private operators, such as "Delfi Plius" and "15min MAX" aim to offer high-quality news content through paid access. However, LRT provides all its content for free, which reduces the appeal of these subscription services.

The increase in LRT's audience and the decline in market share for private operators heavily impact their ability to compete and stay viable. As advertising revenue drops, television, radio, and online platforms struggle to produce high-quality, engaging content, making it harder to attract audiences and generate income. As the largest employer in the media sector with access to significantly greater financial resources, LRT faces little scrutiny over the number of employees it requires. It frequently attracts top talent from commercial competitors, leaving private media companies to hire less experienced staff, which hampers their ability to compete. This directly impacts their operations, leading to lower-quality content that is less appealing to audiences, ultimately weakening their position in the market.

[16] Cooper, Ann. Lithuania's Public Broadcaster and Commercial Rivals Clash over State Funding. *Nieman Reports*. Available at: https://niemanreports.org/articles/lithuanias-public-broadcaster-and-commercial-rivals-clash-over-state-funding/.
[17] See: https://www.15min.lt/verslas/naujiena/finansai/lrt-finansavimas-kitamet-auga-95-mln-iki-73-mln-euru-rodo-biudzeto-projektas-662-2122814

It is established in the preamble (64) of the European Media Freedom Act that '[n]ational rules and procedures can have an impact on the freedom to provide media services in the internal market and need to be properly framed and be transparent, objective, proportionate and non-discriminatory'. The disproportionate financial advantage of LRT not only distorts competition but also challenges the core principles of media pluralism in the internal market. By drawing away top talent and offering content that undermines subscription-based services, LRT effectively reduces the competitive viability of private media companies. This restricts the diversity of media voices and limits the ability of commercial players to maintain their operations, ultimately leading to a media landscape that favours state-backed entities over private independent operators.

The Draft law, by not addressing these competitive imbalances, would only deepen the issues persistent in Lithuania media market, including the one on media pluralism, high concentration, limited resources and impossibility for private media companies to ensure financial viability due to unmatchable competition with state funded national broadcaster that operates under different circumstances in comparison to private companies. The adoption of the Draft law risks further restricting competition and stifling media pluralism, which could have long-term negative consequences on both the Lithuanian media sector and the broader European internal market for media services.

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In conclusion, the legislation (Draft law) leads to a restriction of the freedom to provide services enshrined in Article 56 TFEU (ex Article 49 TEC), but such proposed restrictions do not meet the conditions laid down in the case law of the CJEU as regards their proportionality. Moreover, there are no specific arguments or statistics provided by the Member State as to why such significant restrictions are necessary to achieve the desired objectives. In this situation, it is clear that the negative impact on the various values protected by the EU law will be significant and detrimental.

The stakeholders therefore kindly request the European Commission to deliver a detailed opinion to the effect that the measure envisaged may create obstacles to the free movement of services which would obligate the Republic of Lithuania (as a Member State) to postpone for additional four months the adoption of the Draft law (as a draft rule on services) in line with Article 6 (2) of the Directive 2015/1535.

**Signed by:**

| | |
|---|---|
| All Media Lithuania, UAB (TV3 Group) | Laura Blaževičiūtė, CEO |
| Delfi, UAB | Vytautas Benokraitis, CEO |
| Laisvas ir nepriklausomas kanalas, UAB | Zita Sarakienė, CEO |
| Lrytas, UAB | Tautvydas Mikalajūnas, CEO |
| 15Min, UAB | Tomas Balžekas, CEO |

**This opinion represents the view of the following entities:**

Television channels:
- TV3 Group (TV3, TV6, TV3 Plus, TV8)
- LNK TV Group (LNK, BTV, TV1, INFO TV, 2TV)
- Delfi TV

News outlets:
- www.tv3.lt
- www.delfi.lt
- www.lnk.lt
- www.15min.lt
- www.lrytas.lt
- www.zmones.lt

Radio stations:
- Power Hit Radio
- M-1
- M-1 plius
- Lietus
- Laluna
- M-1 Dance

Magazines:
- Žmonės
- Legendos
- Ji