

National Broadcasting Council (KRRiT) Activity Report in 2024

Warsaw, March 2025

**National Broadcasting Council
(KRRiT)**

**RESOLUTION NO. 96/2025
of 19 March 2025**

Pursuant to Article 9(1) in conjunction with Article 12(1) and (2) of the Broadcasting Act of 29 December 1992 (i.e. Journal of Laws of 2022, item 1722 and of 2024, item 96), the National Broadcasting Council

has decided

1. To adopt the *Report of the National Broadcasting Council on its activities in 2024*, which is attached to the resolution.
2. To present the *Report of the National Broadcasting Council on its activities in 2024* to:
 - the *Sejm* of the Republic of Poland,
 - the Senate of the Republic of Poland,
 - the President of the Republic of Poland.
3. Present the *Report of the National Broadcasting Council on its activities in 2024* to the Prime Minister.

Chairman of the
National Broadcasting Council
/-/ Maciej Świrski

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1. Main activities of the National Broadcasting Council during the reporting year

For the National Broadcasting Council, the reporting year of 2024 was a period of intensive regulatory activity, striving to maintain the integrity and pluralism of the media in the face of significant political and technological challenges.

The National Broadcasting Council continued its activities despite enormous difficulties and unprecedented attempts to exert pressure and influence on the legally made decisions of this constitutional body by the executive branch of government. The Council's main goal was to protect the public interest and maintain democratic standards in the Polish media.

The first priority of such activities was to counteract the effects of the illegal takeover of the public media and to inform the relevant state institutions, as well as the public opinion and international institutions about their situation. The National Broadcasting Council (KRRiT) expressed strong opposition to the government's actions, treating them as an attack on the independence of public broadcasters. Information on this subject can be found in Chapter 2 of the National Broadcasting Council (KRRiT) Activity Report in 2024.

The report describes the actions taken by the National Broadcasting Council to secure subscription fees until the legal status of the so-called liquidators is determined, as well as the results of analyses of the reception and content disseminated by the public media. Viewership research since the unlawful takeover of the public media shows that news and current affairs programmes and TVP INFO have seen a serious drop in viewership. An analysis of the content of news and current affairs programmes indicates bias in reporting. In 2024, the balance in the presentation of political parties' positions on key political issues was disrupted. Further information on this subject is presented in Chapter 2.

Detailed information on the activities of the public service media in 2024 is included in Chapter 13. It presents an assessment of the way in which the tasks defined for 2024 in the programme and financial plans and Charters of Obligations are carried out, as well as the risks associated with the lack of stable funding, which prevents the National Broadcasting Council from applying the statutory provisions regarding the entrusting of public service broadcasting to the media for the following years.

In Chapter 3, the National Council draws attention to attacks by government institutions and the parliamentary majority aimed at the independence of this constitutional body and presents the interventions and objections of the National Broadcasting Council to the disregard and omission in legislative processes and plans related to the introduction of new EU regulations such as: The European Media Freedom Act (EMFA) and the Digital Services Act (DSA).

An exceptional situation in 2024 was the omission of the role of the National Broadcasting Council, as the only authorised regulatory body competent in matters of media services, in connection with the inclusion of *TVN* and *Telewizja Polsat* in the list of protected entities by Poland's Council of Ministers.

In the opinion of the National Broadcasting Council, such proceedings were a violation of the Polish legal system and an attack on the independence of broadcasters, whose duties were defined in the Broadcasting Act in accordance with the principle of *lex specialis derogat legi generali*.

In 2024, the members of the National Broadcasting Council (KRRiT) and its chairman were subjected to unprecedented attacks by state institutions and bodies. An motion to bring the chairman of the National Broadcasting Council before the State Tribunal was unlawfully analysed. The members of the National Broadcasting Council expressed their strong opposition to this situation.

The Chairman of the National Broadcasting Council (KRRiT) spoke out at the European Platform of Regulatory Authorities (EPRA)¹ and ERGA² against the violation of the KRRiT's independence and the unlawful takeover of public media by the current government coalition.

In 2024, the key challenge for the National Broadcasting Council (KRRiT) was to protect information security and fight disinformation, in the face of threats related to the war in Ukraine and Russia's hybrid attacks on Polish institutions, including media institutions, and the disinformation spread by that country on social media.

The actions taken by the National Broadcasting Council in 2024 to counteract the effects of disinformation and other threats are discussed in Chapters 4 and 7.

The National Broadcasting Council has taken a number of measures to correct the manifestations of disinformation coming from many parties, including the current Polish government, some parliamentarians and parliamentary committees, liquidators of public media companies and a few media outlets. The National Broadcasting Council also considers the findings of the European Commission's 2024 report on the rule of law in Poland to be disinformation. The National Broadcasting Council responded to all this false information on an ongoing basis by explaining the true state of affairs in announcements and statements made available on its website.

The National Broadcasting Council draws attention to incidents and events that indicate Russian attacks on technical infrastructure and to false information that may be reproduced by the Polish media. In order to prevent such situations, the National Broadcasting Council asked Prime Minister Donald Tusk to establish cooperation between all bodies responsible for information security. The KRRiT's voice in this matter has remained unanswered. Within the scope of its competences, the KRRiT has launched additional procedures aimed at a detailed examination of entities applying for a licence in terms of their possible impact on state security.

The problems resulting from the recent flood disaster, which affected a large part of the country, posed new challenges for the media. The authorities also had to implement an

¹ <https://www.gov.pl/web/krrit/oswiadczenie-przewodniczacego-krrit-macieja-swirskiego-wygloszone-6-czerwca-2024-r-podczas-59-konferencji-europejskiej-platformy-organow-regulacyjnych-epra-w-rotterdamie>

² European Regulators Group for Audiovisual Media Services (ERGA), now the European Media Services Board (ERUM).

appropriate information policy to ensure that the emergency services were kept calm and able to work together. Unfortunately, the National Broadcasting Council (KRRiT) noticed that not all media were treated equally in terms of access to public information. In this regard, the National Broadcasting Council intervened, appealing to central and regional authorities to maintain equal access to information.

Journalists from some conservative media were not allowed to participate in conferences organised by the Chancellery of the Prime Minister, the Ministry of Culture and National Heritage, and the Ministry of Sport.

The National Broadcasting Council recognises the risks that can arise from the concentration of capital in the media and the pressure exerted on publishers by media owners. A blatant example of this phenomenon is the campaign to withdraw advertisements from *TV Republika* and the television programming of *wPolsce24*. Issues of protecting broadcasters from such pressure should fall within the competence of the National Council, in connection with the new obligations of media regulators resulting from the EMFA³ regulation.

In Chapter 4, the National Council draws attention to the risks for the development of children and young people in connection with their activities in the digital media. The urgent implementation of the Digital Services Act (DSA) is essential to increase the effectiveness of the National Broadcasting Council's activities in this area. The entities responsible for the functioning of digital media services – the government and regulatory bodies – should cooperate closely on this issue. The Minister of Digitisation's omission of the role of the National Broadcasting Council in the draft amendment to the Act on the Provision of Electronic Services should be considered a manifestation of unjustified political ostracism.

In Chapter 5, the National Broadcasting Council discusses the organisation of media research and how it is carried out. It is important to note the radical changes in the funding of the National Media Institute (*KIM*) in 2025. These changes forced the cancellation of many valuable studies, necessary for all media-related entities, including in particular local broadcasters, which are undervalued in commercial research.

As every year, the National Council's annual report provides information on the current situation of digital terrestrial television and radio broadcasting as well as on new broadcasting licences in the DVBT-2 and DAB+ standard.

The National Broadcasting Council (KRRiT) has taken a negative stance on the possible DAB+ expansion plans. There is no justification for the introduction of analogue-digital conversion until the war in Ukraine is over. Broadcasting radio programmes on VHF frequencies ensures that listeners have constant access to national, regional and local information, which is essential in an emergency.

The activities of the KRRiT in connection with the award and amendment of radio and television licences are subject to the statutory objective of ensuring diversity of media sources, particularly

³ Cf. Chapter 17

in independent news and local programmes. These issues are described in [Chapters 6, 14 and 15](#).

In this year's report, the National Broadcasting Council has devoted a great deal of space to the dangers to children and young people of the way in which minors use the media. This issue is addressed in [Chapter 9](#) in the context of the handling of complaints and in [Chapter 10](#), *inter alia*, as part of a discussion of the activities of VoD service providers and VSP⁴ platforms and a presentation of their negative impact on minors.

The KRRiT considers the current level of protection for children and young people to be insufficient. This situation may be improved by entrusting the KRRiT with the powers resulting from the implementation of the Digital Services Act (DSA). The DSA regulations enable the use of appropriate instruments to identify entities responsible for providing content harmful to minors on digital platforms. The identification of content providers is currently a fundamental problem in the effective enforcement by the KRRiT of the statutory obligations of VoD and VSP towards children and young people.

Video on demand services (VoD), as defined in the Broadcasting Act, are not only services platforms like Netflix or Disney. They also include a large number of so-called web channels, which are mainly available on YouTube. They represent an extremely difficult area of regulation.

The Audiovisual Media Services Directive has imposed many new obligations on these providers regarding the relationship between users – recipients of content, users providing content, and the platforms themselves. The statutory obligations are also a major challenge for Polish VSP platforms. [Chapter 15](#) is devoted to the control activities of the National Broadcasting Council (KRRiT) in this regard.

In [Chapter 10](#), the National Council presents issues related to the dissemination of advertising and sponsorship. The following topics are presented: broadcasters' compliance with commercial breaks, rules for presenting sponsors, misuse of the term 'self-promotion', advertising of so-called 'unhealthy food' in children's programmes, and a discussion on standards for beer advertising.

When it comes to an assessment of the implementation by broadcasters and VoD providers of important statutory obligations, such as: facilities for people with visual or hearing impairments, the obligation to broadcast emergency messages, the promotion of programmes in Polish, European and independent productions – are the subject of [Chapter 10](#). The National Broadcasting Council is pleased to see that broadcasters are trying to fulfil these tasks in a responsible manner. This is also the result of the Council having monitored television and radio programmes for many years in terms of their compliance with the provisions of the Act.

⁴ The terms VSP (Video Sharing Platform) and VoD (Video on Demand) have been defined in the Broadcasting Act – cf. Article 4(6a) and (22a) of the said Act.

As part of the dissemination of media education, the National Broadcasting Council conducts a broad information policy on its activities as a regulatory body and supports scientific communities in their research on phenomena occurring in the media world. The National Council motivates broadcasters and media service providers to carry out activities aimed at improving the awareness of recipients and users of their rights. This issue is addressed in [Chapter 11](#).

[Chapter 16](#) presents the activities of the Chairman of the National Broadcasting Council and the National Council in industry organisations such as ERGA and EPRA, in the work of the European Commission and the Council of Europe, as well as bilateral contacts with other regulators in member states. Media regulation in the EU is entering a new level with the entry into force of the DSA and EMFA regulations. Regulatory authorities in member states are already or will soon be equipped with the appropriate tools necessary to exercise effective control over media services in order to protect consumers. Delays in transposing European legislation into Polish law have left the National Council without adequate legal instruments in many important areas.

2. The public media

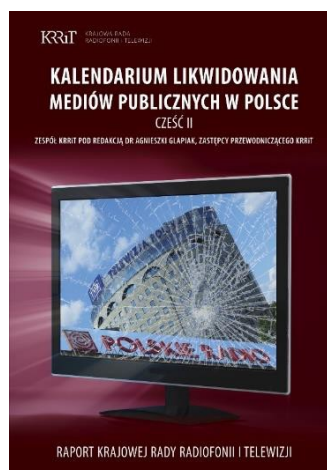
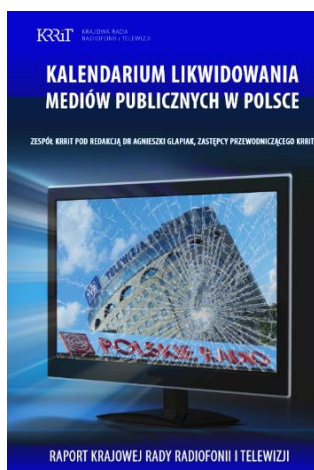
The year 2024 was a very difficult period in the work of the National Broadcasting Council due to the unprecedented and completely unlawful events in the history of Polish media, which culminated on 27 December 2023, when the Minister of Culture and National Heritage decided to liquidate Telewizja Polska SA (Polish Television - TP) and *Polskie Radio* SA (Polish Radio), followed by the event of 29 December 2023, when the same happened to 17 regional public radio and television stations. The National Broadcasting Council intensified its activities to protect the basic principles of democracy and freedom of speech, in accordance with the constitutional norm of Article 213(1): *‘The National Council of Radio Broadcasting and Television shall safeguard the freedom of speech, the right to information as well as safeguard the public interest regarding radio broadcasting and television’*. It was not only a time of defending the independence and pluralism of the media, but also a time of resisting pressure and threats aimed at limiting the constitutional role of the National Broadcasting Council.

2.1. ‘Timeline of the liquidation of public media in Poland’ – National Broadcasting Council publication

In 2024, the National Broadcasting Council (KRRiT) closely monitored the situation of public media after the unprecedented attack on *Telewizja Polska*, *Polskie Radio* and *Polska Agencja Prasowa* and their takeover by force in December 2023 and the announcement of the start of the liquidation process of the public media by the then Minister of Culture and National Heritage, Bartłomiej Sienkiewicz.

The National Broadcasting Council (KRRiT) has published a two-part publication entitled ‘Timeline of the Liquidation of Public Media in Poland - KRRiT Report’ edited by Dr Agnieszka Glapiak - Deputy Chairperson of the KRRiT. The report describes in chronological order the

takeover of *TVP*, *Polish Radio*, *PAP* and the *regional Polish Radio stations* by the Minister of Culture and National Heritage and the liquidators, as well as the activities of the National Broadcasting Council and other constitutional bodies, associations and politicians in defence of the public media. The publication was based on documents from the National Broadcasting Council, media reports and social media posts.



By following the link <https://www.gov.pl/web/krrit/analizy-raporty-i-prezentacje> and expanding the 2024 tab, you can access both parts of the ‘*Timeline of the Liquidation of Public Media in Poland*’.

2.2. The situation of the public media one year after the announcement of its liquidation process’ - expert debate at the National Broadcasting Council

Dr Agnieszka Glapiak, Deputy Chair of the National Broadcasting Council (KRRiT), organised and moderated a debate with experts on 12 December 2024 entitled ‘*The situation of public media one year after the announcement of the process of their liquidation*’, with the participation of the following panellists: Maciej Świrski – Chairman of the National Broadcasting Council, Michał Adamczyk – the legal chairman of TVP, Jolanta Hajdasz - President of the Association of Polish Journalists, Tadeusz Deszkiewicz - President of Radio dla Ciebie until the liquidation of public media, and Wojciech Skurkiewicz - Chairman of the TVP Programme Council.

Among the invited guests were Hanna Karp – member of the National Broadcasting Council, and journalists: Anita Gargas, Dorota Kania, Tomasz Sakiewicz, Samuel Pereira, Jarosław Krajewski – chairman of the Programme Council of the Polish Television Branch – TVP3 Warsaw and MPs Joanna Borowiak and Maciej Małecki – participants of the events on 20 December 2023

at TVP headquarters, as well as department directors of the National Broadcasting Council office.

Dr Agnieszka Glapiak reminded the audience that ‘strong men’ had entered *Telewizja Polska*, *Polskie Radio* and *Polska Agencja Prasowa* and taken over the public media. The time has come to ruin journalistic careers, to stifle the public's right to information by not allowing journalists to attend government press conferences, and to develop topics inspired by government representatives (this is evidenced by data showing how often representatives of the ruling coalition appeared in public media broadcasts). Valuable programmes and programme archives have been removed. Throughout 2024, TVP's viewership has been declining. TVP Info has lost as many as 76% of its viewers compared to the previous year. ‘Public media have ceased to matter; they have surrendered their leading position,’ summarised Dr Agnieszka Glapiak. The loss of viewers has affected the financial situation and image of the public media.

The Chairman of the National Broadcasting Council (KRRiT), Maciej Świrski, responded to the attacks on the National Council and explained in detail the issue of transferring funds from the subscription fees collected earmarked for the public media. He emphasised that the National Broadcasting Council pays particular attention to the spending of public funds from the subscription fees. ‘From a legal point of view, we are not breaking any laws. We are acting in accordance with the law,’ he emphasised.

The process of liquidation of public media has not only shaken their existing, good and well-established position in the competitive media market, but also, and this is very important, significantly reduced the public's access to diverse sources of information. This is particularly worrying in the context of maintaining media pluralism, which is a basic condition for the functioning of a democracy. Therefore, the actions of the National Broadcasting Council (KRRiT) are aimed at restoring the independence and pluralism of Polish public media, and the priority is always to act in the public interest, based primarily on the independence and objectivity of public media.

According to the Chairman of the National Broadcasting Council, the conclusion regarding the actions of the executive branch is very negative. Unlawful acts have seriously weakened the role of public media on the Polish market, thereby threatening the foundations of democracy, limiting the rights of viewers, including the right to reliable information, causing legal chaos, and financial destabilisation of the public media sector, which in turn has deepened the market dominance of large commercial broadcasters in TV advertising.

For more information on the debate, please visit: <https://www.gov.pl/web/krrit/debata-krrit>

2.3. The securing of subscription fee funds

The unlawful actions of the Minister of Culture and National Heritage have prevented the National Council from using the existing procedures for transferring subscription funds to public service broadcasting companies.

The National Broadcasting Council, faced with uncertainty as to who actually has the legal title to dispose of public funds allocated to the functioning of public media, adopted a resolution at the beginning of 2024 on postponing the deadline for the implementation of the schedule for the transfer of these subscription funds, at the same time indicating a legal path for public broadcasters so that they could receive these funds despite the liquidation of the companies.⁵ The National Broadcasting Council then decided that the funds from the subscription fees would be placed in a court deposit until the liquidation process of the companies was legally confirmed by the court.⁶

Therefore, any statements about the National Broadcasting Council withholding funds from subscription fees were and are untrue. It is possible for authorised persons to withdraw funds from the deposit after submitting appropriate statements. At the time of making this decision, the liquidators had not been legally registered in the National Court Register. For these reasons and due to the provisions of law,⁷ the National Broadcasting Council (KRRiT) has not been able to transfer further tranches of subscription fees to the companies managed by the liquidators. Therefore, the National Broadcasting Council (KRRiT) decided to transfer these funds in subsequent tranches to the court deposit. This defective state of affairs, caused by the decision of the Minister of Culture and National Heritage, can only be resolved by the court.

The executive branch, in turn, in an attempt to solve the problem it had created, decided in early 2024 to transfer money from the budget reserve to public media companies, which, under current law, constituted illegal state aid and was not reported to the Office for the Protection of Consumers and Competition (UOKiK).

2.4. Dissemination of false information about the possibility of obtaining subscription funds for regional radio stations

In a situation of legal chaos created by the government, programmes broadcast by Poland's 17 regional radio stations contained information that misled the public about the actual legal status of the payment of the subscription fee. In May 2024, the National Broadcasting Council issued a statement⁸ in which it emphasised the negative role of the government of Prime Minister Donald Tusk in carrying out the unconstitutional process of the liquidation of the public media, the consequences of which the National Broadcasting Council is accused of, blaming it for blocking the payment of subscription fee funds.

⁵ Cf. Resolution No. 8 of 10 January 2024.

⁶ Cf. Resolution No. 40 of 7 February 2024.

⁷ Cf. Article 11(1) of the Act of 17 December 2004 on Public Finance Discipline.

⁸ Communiqué of the National Broadcasting Council (KRRiT) of 30 May 2024. KRRiT calls for a stop to the dissemination of fake news on the airwaves of 17 regional Polish Radio stations - National Broadcasting Council - Gov.pl Portal

In a statement, the National Broadcasting Council emphasised once again that these funds are deposited in court-approved accounts with the Ministry of Finance. The liquidators of the regional radio stations and *Polskie Radio SA* (Polish Radio SA) can voluntarily withdraw them at their own request.

In response to further accusations against the National Broadcasting Council (KRRiT) regarding the lack of sufficient funds for the operation of regional broadcasters, the Council reminded that the broadcasters also make a living from advertising, sponsorship, grants and their own publications. The subscription fee, which is intended exclusively for the fulfilment of the public mission, only supplements the resources to cover the costs of programme creation and distribution.

A similar position on the disinformation and slander presented by the so-called liquidators was voiced by the Chairman of the National Broadcasting Council (KRRiT) during a press conference on 6 June 2024, referring, among other things, to the fact that the so-called liquidators themselves, who in practice act as managers of public radio and television stations, confirmed at his conference that the liquidation of these media is only a superficial, temporary measure that can be reversed at any time. This took place immediately after the Provincial Administrative Court in Warsaw rejected another complaint against the KRRiT's resolutions on transferring subscription funds to the court deposit.⁹ The liquidators accused the Chairman of the KRRiT of intending to destroy the public media and of acting illegally; they agreed with the propagandistic nature of the government's actions, which serve to justify the executive's arm of the government's violent takeover of the public media.

Revealing the real purpose of the Minister of Culture and National Heritage's actions, which aimed to subjugate public media and turn them into government media, the Chairman of the National Broadcasting Council (KRRiT) referred to the 2016 ruling of the Constitutional Tribunal¹⁰ in which it ruled that it was unconstitutional and therefore contrary to the law, to deprive the National Broadcasting Council of influence over the appointment of public radio and television authorities. It should be emphasised that this judgement was passed with the full approval of the then Ombudsman and current Minister of Justice, Adam Bodnar.

Referring to the allegation of the alleged 'starving of regional stations of the Polish Radio', the Chairman of the National Broadcasting Council pointed out that despite the six-month activity of the so-called liquidators, none of the companies plans to close down their operations. On the contrary, the so-called liquidators are demanding further funds, falsely claiming that the current lack of subscription revenue in their budget amounts to as much as 60 to 85% of their entire budget. However, the data specified in the programme and financial plans of the companies for 2024 show that the money from the subscription fee covers the costs of public mission broadcasts in regional stations, in the amount of approx. 34% to approx. 50%, depending on the station. In *Telewizja Polska* (Polish Television) it is approx. 8%, and in *Polskie Radio* (Polish Radio)

⁹ Cf. <https://www.gov.pl/web/krrit/odpowiedz-przewodniczacego-krrit-na-dezinformacje-i-oszczerstwa-tzw-likwidatorow-zaprezentowane-na-konferencji-prasowej-dnia-6-czerwca-br-zorganizowanej-po-odrzuconiu-przez-wojewodzki-sad-administracyjny-w-warszawie-kolejnej-skargi-na-uchwaly-krrit>

¹⁰ The judgement was passed by the panel: Andrzej Rzepliński – chairman, members: Leon Kieres, Stanisław Rymar, Piotr Tuleja and Marek Zubik.

approx. 40%. In addition, the companies achieved a budget surplus in 2023 in public mission implementation costs, which they should allocate in full to public mission related activities in 2024.¹¹ The Chairman of the National Broadcasting Council (KRiIT) reminded that press reports show that the liquidated units were solidly financed from the state budget.

The liquidators misled the public by claiming that they could not collect the money from the court deposits because the requests for its payout were rejected and the money was returned to the National Broadcasting Council's account. This claim was another manipulation.

The subscription fee money allocated for the fulfilment of the public service remit was paid directly to those companies whose liquidators had been legally entered in the National Court Register, i.e. to those companies whose entry registrations had been recognised as lawful by the courts. There were seven such cases among the 17 radio stations (*Radio Poznań*, *Radio dla Ciebie*, *Radio Lublin*, *Radio Katowice*, *Radio Łódź*, *Radio Rzeszów*, *Radio Gdańsk*).

Information on the payment of subscription fees is presented in Chapter 12.

2.5. The National Broadcasting Council's decision to pay out the subscription fees in connection with the state of emergency due to the flood on 17 September 2024.

In view of the catastrophic consequences of the September 2024 flood, which affected many Polish families, as well as the need to support the public media, which are the main source of information, the National Council has decided to amend Resolution No. 40/2024 of 7 February 2024 on the use of subscription fee revenue for the implementation of public missions. The National Broadcasting Council made this decision out of concern for the interests of viewers who have been or may be affected by the natural disaster that has struck the country.

The National Broadcasting Council decided to accelerate the payment of the next tranche of subscription fees, with the funds to be allocated primarily to regional centres. The National Broadcasting Council also decided to transfer the surplus for 2022, amounting to over PLN 22 million, to the media.

Telewizja Polska received 51% of this amount. The company was obliged to transfer 70% of the funds to TVP's regional branches. The remaining 49% was received by *Polskie Radio* and regional *Polskie Radio* stations. Information on the payment of subscription fees in connection with the flood can also be found in the section entitled *Information on the basic problems of radio and television in 2024*.

¹¹ See : <https://www.gov.pl/web/krrit/media-publiczne-osiagnely-w-2023-r-nadwyzke-budzetowa-w-lacznej-kwocie-83-967-tys-zl->

2.6. Appeal of the Chairman of the National Broadcasting Council to the Minister of Culture and National Heritage regarding the urgent completion of the liquidation process of the public media and the guarantee of real and permanent funding from sources other than the subscription fee

In November 2024, the National Council, despite a positive evaluation of the projects, passed a resolution refusing to authorise the Chairman of the National Broadcasting Council to conclude agreements with public radio and television entities on the establishment of Charters of Obligations for these entities for the years 2025-2029.¹²

In the opinion of the National Broadcasting Council, all public media companies have indicated estimated costs for the fulfilment of statutory public service tasks that are currently impossible to finance from public funds, even assuming the use of planned own funds. This results in a significant funding shortfall for each year of the 2025-2029 Charters of Obligations. An analysis of the charters shows that nearly PLN 15 billion in funding is lacking to fully implement the public service remit over a five-year period as defined in the charters.

According to the National Broadcasting Council, any assumptions regarding the revenues of public broadcasters in the coming years of the Charters of Obligations, derived from subsidies from the state budget, in the absence of a specific legal basis regulating such subsidies, should be considered at least premature and unjustified. The National Broadcasting Council (KRRiT) maintained its position that setting Charters of Obligations for public media companies is contrary to the objectives of the liquidation process. Until the legal status is restored in accordance with the Broadcasting Act, especially in light of the judgment of the Constitutional Tribunal¹³ and the end of the apparent nature of the liquidation proceedings, and in order to ensure stable financing of the public service from public funds, there is no reason to establish the debt repayment plan for 2025-2029 in the form submitted by the public radio and television companies.

The Chairman of the National Broadcasting Council (KRRiT) called on the Ministry of Culture and National Heritage (MKiDN), which is responsible for the legal status of public media companies, to take urgent action to complete the liquidation process and ensure a stable system of financing the public service, which will allow for the uninterrupted fulfilment of all statutory obligations. The appeal did not address the issue in any substantive way.

¹²See: <https://www.gov.pl/web/krrit/krrit-jednoglosnie-odmowila-upowaznienia-przewodniczacego-macieja-swirskiego-do-zawarcia-porozumienia-w-sprawie-ustalenia-kart-powinnosci-mediow-publicznych-na-lata-2025--2029>

¹³ Cf. the judgement of the Constitutional Tribunal of 18 January 2024 in Case No. K 29/23

2.7. Biased coverage of TVP's programmes – a report by the National Broadcasting Council

On 22 April 2024, the National Broadcasting Council published a report on the fulfilment of the public mission by TVP (Polish public television) in liquidation. The monitoring of the TVP news service: '19.30' and, in the same context, TVN's *Fakty* ('Facts'), *Wydarzenia* ('Events') of *Telewizji Polsat* and *Dzisiaj* ('Today') of *TV Republika*, was conducted between 21 December 2023 and 31 March 2024. The report confirmed a huge drop in viewership after the media was taken over by the ruling coalition and the omission of information inconvenient for the ruling camp from TVP programmes.¹⁴

Avoidance of information that is inconvenient for the ruling coalition, scarce and one-sided coverage of the so-called revival of the public media and doubts about the legality of the authorities' actions in this area, factual errors and technical blunders – these are the main conclusions from the monitoring of the main news programme of the public television – '19.30'.

The analysis showed that, compared to the news programmes of competing TV channels - TVN's *Fakty*, Polsat's *Wydarzenia* and TV Republika's *Dzisiaj*, the '19.30' news programme avoided reporting on the takeover of public media by Donald Tusk's government, and did not show footage illustrating the manner and moment of the invasion of the buildings of *Telewizja Polska*, *Polskie Radio* and *Polska Agencja Prasowa* (PAP). There were also no reports on the course of the social protests in defence of public media. The materials did not include statements by constitutionalists, the position of the Helsinki Foundation for Human Rights, the National Broadcasting Council and the Chairman of the National Broadcasting Council criticising the manner of the forcible takeover of the public media.

The monitoring showed that the '19.30' news programme did not report, or only briefly mentioned, other issues that were uncomfortable for the government, including the demonstrations outside the prisons where opposition MPs Mariusz Kamiński and Maciej Wąsik, who had been detained in the presidential palace, were being held. This was also reported by other TV stations. There was no mention of the journalistic investigation into former Senate Marshal Tomasz Grodzki of the Civic Platform party, who is suspected of corruption during his time as hospital director.

A subsequent analysis showed that the '19.30' news programme did not report on topics that were inconvenient for the government, such as the nationwide agricultural protests, the arrest and inhumane treatment of Fr Michał Olszewski and two former Ministry of Justice officials, the case of Russian spy Pavel Rubtsov, aka Pablo Gonzalez, and his partner, a Polish journalist who was part of the so-called '*Grupa Wejście*' (the 'Entry Group'), that forcibly took over the public media in December 2023. Criticism of the government's actions during the floods in south-western Poland was also ignored.

¹⁴ <https://www.gov.pl/web/krrit/ogromny-spadek-ogladalnosci-serwisu-informacyjnego-tvp-1930-raport-z-monitoringu-krrit>

2.8 Imbalance in programmes presenting the positions of political parties on key public issues

According to Article 23(1) of the Broadcasting Act, the public media are obliged to provide opportunities for political parties to present their positions on key public issues. The procedure for these matters was regulated in the KRRiT regulation of 24 April 2003 *on the procedure for presenting the positions of political parties, trade unions and employers' associations on key public issues in public radio and television programmes*.

After the end of each quarter of 2024, public radio and television companies submitted reports to the National Broadcasting Council (KRRiT) on the airtime allocated to the broadcasting of programmes presenting the positions of political parties on key public issues.

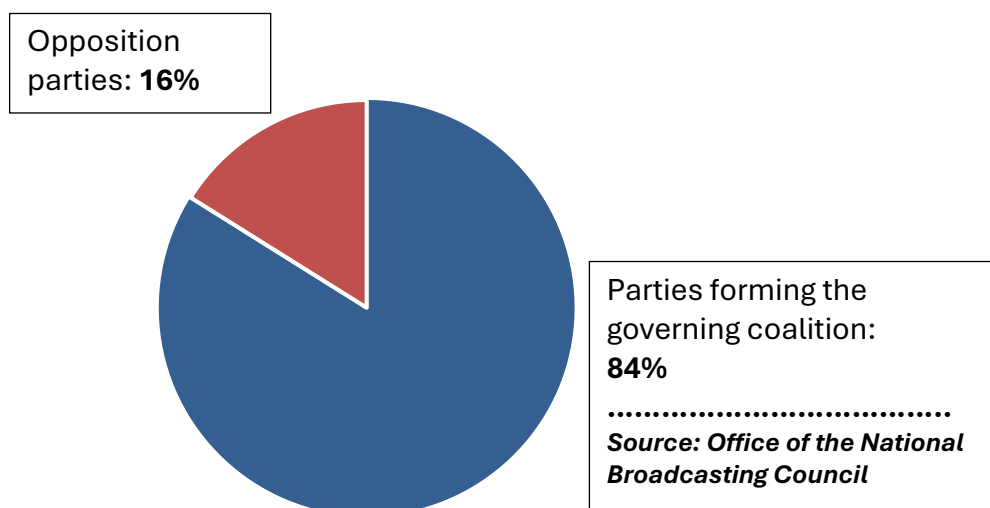
These reports show that in 2024, the public media devoted significantly more time to the political parties in the ruling coalition than to the opposition parties.

Telewizja Polska (Polish TV)

In 2024, the total amount of time allocated to political parties in Polish Television programmes was 743 hours and 2 minutes, including the time of parties belonging to the ruling coalition (Civic Platform, *Inicjatywa Polska* (Polish Initiative), *Nowoczesna*, Polish People's Party, Poland 2050 by Szymon Hołownia, the New Left, *Lewica Razem*, *Centrum dla Polski* (Centre for Poland), Polish Socialist Party, Social Movement Agrounia TAK ('YES'), Green Party, Union of European Democrats) was 623 hours and 33 minutes, and the time allocated to the opposition parties (i.e. the other parties) was 119 hours and 29 minutes.

The following pie chart shows the graphic proportions of time allocated to parties in government and the opposition (in %):

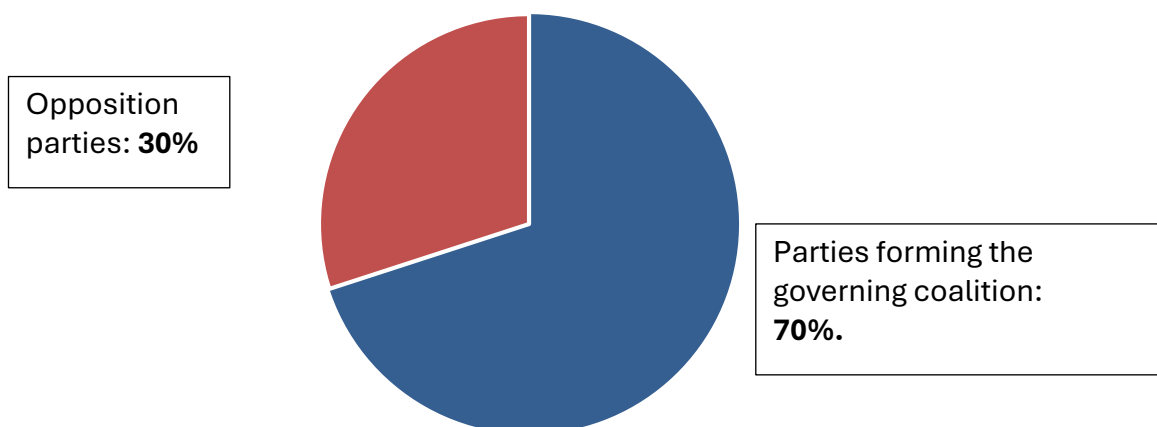
Share (%) of political parties in time allocation over the total number of political parties from January to December 2024.



Polskie Radio (Polish Radio)

In 2024, the total time allocated to political parties on Polish Radio programmes amounted to 298 hours and 27 minutes, including the time allocated to parties in the ruling coalition *Platforma Obywatelska* (Citizens' Platform), *Inicjatywa Polska*, *Nowoczesna*, *Polskie Stronnictwo Ludowe* (PSL), *Polska 2050 Szymon Hołownia*, the New Left, Left Together, Centre for Poland, Polish Socialist Party, Green Party, Union of European Democrats, Non-Partisan Local Government Officials – United by Poland) amounting to 208 hours and 50 minutes, and the time allocated to the opposition parties (i.e. the other parties) was 89 hours and 37 minutes.

Share (%) of political parties in air time allocation over the total number of political parties from January to December 2024.



Source: Office of the National Broadcasting Council

Regional Polish Radio Stations

Radio Broadcasting Station	% share of parties forming the ruling coalition	% share of parties constituting the opposition
Polskie Radio Zachód	74	26
Polskie Radio Łódź	70	30
Polskie Radio Koszalin	68	32
Polskie Radio Olsztyn	68	32
Polskie Radio Wrocław	67	33
Polskie Radio Kraków	66	34
Polskie Radio dla Ciebie	67	33
Polskie Radio Gdańsk	63	37
Polskie Radio Katowice	62	38
Polskie Radio Szczecin	64	36
Polskie Radio Kielce	64	36
Polskie Radio Rzeszów	60	40
Polskie Radio Pomorza i Kujaw	60	40
Polskie Radio Poznań	60	40
Polskie Radio Opole	59	41
Polskie Radio Lublin	58	42
Polskie Radio Białystok	54	46

Source: Office of the National Broadcasting Council

Detailed information on this subject was presented by the National Council on 31 January 2025 on its website,¹⁵ together with tables showing the share of individual political parties in the programmes of all public media companies.

¹⁵ See: <https://www.gov.pl/web/krit/partie-koalycji-rzadzacej-otrzymaly-w-2024-r-w-publicznych-mediach-zdecydowanie-wiecej-czasu-antenowego-niz-partie-opozycyjne>

This information was also presented in ‘*Timeline of the Liquidation of Public Media in Poland*’ – Part 2, edited by Dr Agnieszka Glapiak, Deputy Chair of the National Broadcasting Council.¹⁶

2.9. Drastic drops in viewership – a result of the process of liquidation of the public media

The TVP Info signal was switched off on 20 December 2023. On that day, the main news programmes were also not broadcast on other channels of *Telewizja Polska* (Polish TV). This unprecedented event in the history of democratic Poland had a negative impact on the viewing figures of individual programmes as well as TVP's news programmes, including ‘19.30’, ‘*Panorama*’ and ‘*Teleexpress*’.

The following months of 2024 did not bring any improvement in the situation; public television still did not regain viewers and lost market shares. Compared to 2023, the leading programmes of *Telewizja Polska* recorded significant drops in viewership.

Detailed information on this topic can be found in the section entitled ‘*Information on the basic problems of radio and television in 2024*’.

3. The National Broadcasting Council as a constitutional body

3.1. The independence of regulatory bodies

The Chairman of the National Broadcasting Council (KRRiT), presenting the *Report on the annual activities of the National Broadcasting Council for 2023* during a debate in the Polish Senate, emphasised the need for the legislative and executive authorities to respect the constitutional role of the National Broadcasting Council and its independence guaranteed in Article 213 of the Constitution of the Republic of Poland. The fact that the KRRiT belongs to the group of constitutional state control and legal protection bodies is a constitutional principle in Poland.

The KRRiT safeguards the freedom of expression, the right to information and the public interest in radio and television, and the protection of these values justifies the independence of the media from any government orders. The content of the media may only be reviewed *ex post*, but even this review cannot be carried out in a democratic state by the same body that makes state policy.

The independence of media regulators in EU member states is guaranteed by the provisions of the Audiovisual Media Services Directive, which also emphasises the government's obligation to

¹⁶ Cf. pt 2.1

ensure that such bodies have appropriate operating conditions and stable, secure and adequate funding.

Since 2018, EU legislators have expanded the responsibilities of media regulators by entrusting them with the supervision of new services such as video-on-demand (VoD) and video-sharing platforms (VSP). The Digital Services Act (DSA), adopted by the Council of the European Union on 4 October, was supposed to strengthen the responsibilities of the National Broadcasting Council (KRRiT) by regulating not only audiovisual media but also the digital press. So far, however, this has not happened, as the government has opted for a different approach to implementing the provisions of the DSA in Polish law.

More information on these issues is provided in [Chapter 17](#).

3.2 Objection of National Broadcasting Council members to the motion of bringing the Chairman of the National Broadcasting Council before the State Tribunal

In May 2024, the Minister of Culture and National Heritage Bartłomiej Sienkiewicz, who is responsible for the legal chaos in the public media and who consistently pursued a policy of destroying the independence of the National Broadcasting Council (KRRiT) as a constitutional body, announced that the chairman of the KRRiT would be brought before the State Tribunal.

In a statement issued on 9 May 2024, the members of the National Broadcasting Council (KRRiT) expressed their strong opposition to this declaration, stressing that it was perceived as an unprecedented attempt to intimidate a constitutional body and to exert pressure to obtain decisions favourable to the executive power.¹⁷

3.3. Ostracism of the National Broadcasting Council by government institutions, manifested in the elimination of its role in the legislative process

In last year's parliamentary debate, the Chairman of the National Broadcasting Council stressed the need for careful preparation for the implementation of important EU legislation that will significantly affect the regulatory environment of the public media, while at the same time declaring the active role of the National Broadcasting Council in developing appropriate legal solutions.

February 2024 was the deadline for transposing the Digital Services Act (DSA) into national law. By that date, Member States should have appointed a national coordinator for digital services and decided on the designation of other competent authorities. They should also have

¹⁷ See: <https://www.gov.pl/web/krrit/oswiadczenie-czlonkow-krajowej-rady-radiofonii-i-telewizji>

adopted a law implementing the DSA, setting out in detail the areas of competence, rules of cooperation and other procedural issues that the DSA leaves to national law. February 2024 was the deadline for the transposition of the Digital Services Act (DSA) ¹⁸ into national law. By that date, Member States should have nominated a national coordinator for digital services and decided on the designation of other competent authorities. They should also have adopted a law implementing the DSA, setting out in detail the areas of competence, rules of cooperation and other procedural issues that the DSA leaves to be regulated in national law.

Since the adoption of the DSA on 4 October 2022 by the Council of the European Union, the National Council has been drawing attention to the need to accelerate work on the implementation of the DSA in Poland and has made substantive proposals, including emphasising that the National Broadcasting Council (KRRiT) should be the competent body in the area of protection of freedom of expression and the right to information of platform users, explicitly pointing to the exclusion of websites used for the exchange of content.

These postulates were not reflected in any of the projects prepared by the Ministry of Digitisation. In the opinion of the National Broadcasting Council, the implementation of the DSA in Poland has become politicised, resulting in the risk of censorship of online content.

The Polish government is challenging the constitutional role of the independent, pluralistic regulatory body of the current National Broadcasting Council for political rather than substantive reasons.¹⁹

More information on these issues is provided in [Chapter 17](#).

A similar situation also occurs in the implementation of the European Media Freedom Act (EMFA).²⁰ In the opinion of the National Broadcasting Council, this regulation is non-treaty in nature, but according to the Polish legal system, it requires appropriate changes, among others, in the Broadcasting Act. The amendment to the act should include the assignment of a significant part of the tasks to the body competent in matters of media services.

In connection with the implementation of the EMFA, as in the case of the DSA, the National Council declared its full readiness to cooperate with the Minister of Culture and National Heritage in order to develop the best possible regulatory solutions.

At the same time, the National Broadcasting Council announced that, if it were to adopt a broader approach to amending the Broadcasting Act than that explicitly stated in the Audiovisual Media Services Directive, it would request that other proposals be added to the list of

¹⁸ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a single market for digital services and amending Directive 2000/31/EC (Digital Services Act - DSA).

¹⁹ Cf. draft of 13 December 2024 of the law implementing the DSA, including the explanatory memorandum, p. 63: *'Furthermore, given the competence of the National Broadcasting Council in the field of video sharing platforms, it could in the future, after the necessary reforms to guarantee its independence, also be considered a competent authority within the meaning of Article 49 of the Regulation'*.

²⁰ Regulation (EU) 2024/1083 of the European Parliament and of the Council of 18 November 2020 on the establishment of a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act, EMFA) – see [Chapter 17](#).

amendments, which stem from the current practice of applying the Audiovisual Media Services Directive which have repeatedly been the subject of *de lege ferenda* proposals by the National Broadcasting Council in the past, be included in the list of amendments.

Unfortunately, this voice has not been heard. The National Broadcasting Council has been deprived of both direct influence on the shape of the discussion on the proposed solutions and the possibility of making proposals concerning the modernisation of existing regulations.

In the works of the Ministry of Culture and National Heritage related to the implementation of the EMFA Act, there have also been announcements regarding the adoption of a new model of financing the public media. The National Broadcasting Council has not been included in these works either, although as the body responsible for supervising the implementation of the public mission and for allocating funds for its fulfilment, it has the greatest knowledge and competence to prepare proposals for changes. This particularly concerns the organisation of a transition period and the safeguarding of the public broadcasting mission during this period.

The National Broadcasting Council has called on the ministry responsible for the implementation of the Broadcasting Act and the Act on Subscription Fees to urgently change the way in which funds are raised to finance the public service remit. The uncertainty associated with the lack of a stable funding system for public service media has caused problems with the adoption of the new Public Service Media Charter of Obligations in 2024 for the years 2025-2029.

3.4. Disregard for the constitutional and statutory role of the National Broadcasting Council in connection with the Council of Ministers' inclusion of TVN and *Telewizja Polsat* in the list of entities subject to protection

On 18 December 2024, the Council of Ministers adopted a regulation on the list of entities subject to protection and their competent supervisory bodies. The regulation will be in force until 31 December 2027. The Council of Ministers has extended the list of protected entities to include companies holding programme distribution licences, i.e. *Telewizja Polsat Sp. z o.o.* and *TVN SA*.

In its statement of 18 December 2024, the National Broadcasting Council stated that the actions of the Council of Ministers had disregarded, in particular, the constitutional and statutory role of the National Council, as concerns:

- Articles 213–215 of the Polish Constitution, which state that the National Broadcasting Council is a constitutional body of state control and legal protection and is independent of the Council of Ministers and government administration bodies,
- Article 6(2)(1) of the Broadcasting Act, which states that one of the tasks of the National Broadcasting Council is to develop state policy in the field of broadcasting in consultation with the Prime Minister.

The National Broadcasting Council was not consulted at any stage of the legislative process about the government's intentions, nor was it even informed about the planned new form of supervision of the private media by the Council of Ministers that is completely different from the one resulting from the Broadcasting Act.

The National Broadcasting Council stated that the above-mentioned actions of the Prime Minister and members of the Council of Ministers in the field of control of the media market in Poland constitute another attempt to usurp the powers of the National Broadcasting Council, and may be a prelude to the state administration's influencing the content of the programmes offered by broadcasters dependent on it.²¹

4. Media responsibility and information security

4.1. Equal media access to information about the activities of the government and other state institutions

Concerned about the numerous cases of journalists being banned from attending press conferences and briefings by government ministers, including *TV Republika* from attending press conferences and briefings by members of the government, the National Council, in a statement of 2 July 2024, expressed its strong opposition to the above practices, which prevent certain editorial offices from fulfilling their basic duties under the Press Law.²²

Article 61 of the Constitution of the Republic of Poland refers to the right of citizens to obtain information about the activities of public authorities. Article 2 of the Press Law clearly states that *'State authorities, in accordance with the Constitution of the Republic of Poland, shall create the conditions necessary for the press to perform its functions and tasks, including enabling the activities of editorial offices of newspapers and magazines that are diverse in terms of programme, subject matter and attitudes.'* Article 4 of the Access to Public Information Act also refers to the obligation of public authorities to make information available, while Article 18 indicates that access to information cannot be made available only to selected entities. The Press Law also stipulates that the press must not be prevented from collecting critical material or in any way suppress criticisms (Article 6 of the Act).

The National Council has noted numerous cases of journalists' access to information being restricted, including during press conferences held by members of the government and crisis management teams on the autumn floods in south-western Poland. These restrictions can be classified as actions threatening public safety.

²¹ See: <https://www.gov.pl/web/krrit/rzad-rzeczypospolitej-polskiej-uzurpuje-sobie-prawa-krrit>

²² <https://www.gov.pl/web/krrit/stanowisko-krajowej-rady-radiofonii-i-telewizji-z-2-lipca-2024-r-w-sprawie-rownego-dostepu-do-informacji-publicznej>

In a statement on 16 September, the National Council emphasised that equal access to all media is essential to ensure that the widest possible group of citizens is informed about the measures being taken to save lives and provide assistance. Knowledge of the risks, the current activities of the emergency services and the recommendations of the crisis management teams enable people to take appropriate measures to protect themselves, their health and their property. Blocking journalists' access to information is unacceptable and illegal, especially in emergency situations..²³

In connection with numerous cases of unequal treatment of the media in access to public information, the Chairman of the National Broadcasting Council (KRRiT) asked the Ombudsman to intervene on 8 November 2024, informing him, inter alia, about the use of censorship by the organisers of Prime Minister Donald Tusk's press conferences.²⁴ This censorship takes the form of blocking participation in conferences and making it difficult to ask questions. The chairman of the National Broadcasting Council emphasised that this violates the rights of citizens, in this case the listeners and viewers of radio and television programmes, who have access to information through a given editorial office.

According to the Polish Constitution and Press Law, every citizen has the right to information about the activities of public authorities and persons holding public office. This is one of the fundamental civil rights listed in the Constitution and in the Broadcasting Act in its Article 1(1)(1).

4.2. Appeal of the National Broadcasting Council to the media for prudence and reliability when reporting on the catastrophic flood situation in Poland²⁵

The National Broadcasting Council has been closely monitoring the media reports on these tragic events. In the opinion of the KRRiT, not all media outlets provided reliable and credible information without fuelling negative emotions and causing panic among those affected by the catastrophe. A natural disaster can never be treated as a so-called 'interesting topic'.

On 16 September 2024, the National Council appealed to the media to remember that the most important values are the health, life and safety of people. When the fire brigade, the police, the army and the rescue services are fighting against the elements, the reliable and objective transmission of information is an essential prerequisite for effective assistance and its coordination by competent state institutions. The media is an extremely important element in promoting the activities and orders of the anti-crisis headquarters. It is this element that affects the health, life and safety of the inhabitants of a given area.

²³ <https://www.gov.pl/web/krrit/apel-krrit-do-mediow-o-rozwage-i-rzetelnosc-podczas-informowania-o-katastroficznej-powodzi-w-polsce>

²⁴ <https://www.gov.pl/web/krrit/konferencje-prasowe-premiera-donald-tuska-sa-cenzurowane-i-naruszaja-prawo-obywateli-dostepu-do-informacji--pismo-przewodniczacego-krrit-do-rzecznika-praw-obywatelskich>

²⁵ See: <https://www.gov.pl/web/krrit/apel-krrit-do-mediow-o-rozwage-i-rzetelnosc-podczas-informowania-o-katastroficznej-powodzi-w-polsce>

4.3. Increasing media responsibility and transparency

The reaction of the National Broadcasting Council to the false PAP dispatch about the possibility of partial mobilisation in Poland ²⁶

On 31 May 2024, at 14:00, the Polish Press Agency (PAP) published a false top-priority newsflash that a partial military mobilisation was to take place in Poland. The news was withdrawn from the website a few minutes later, then re-sent, then withdrawn again, and finally the Polish Press Agency (PAP) announced that the news was false. The National Broadcasting Council (KRRiT) called on those responsible for the security of IT infrastructure in the media to carry out constant checks to eliminate the threat of hacking. According to the National Broadcasting Council, such attacks will become more frequent and the damage caused by the publication of fake news can threaten the security of the state and its citizens, international security and cause fear and social destabilisation.

Information from the National Broadcasting Council (KRRiT) on the possibility of reporting incidents of an informative nature during the elections to the European Parliament ²⁷

Since 5 June 2024, the National Broadcasting Council (KRRiT) has provided guidelines on its website for reporting information disruptions that may affect the conduct of the European Parliament elections.

In this way, the National Broadcasting Council encouraged citizens to report any incidents of a disinformation nature, especially in the context of the forthcoming elections, and indicated public bodies to which disturbing incidents could be reported: NASK, CERT Polska, CERT Artemis, the Internal Security Agency, CSIRT GOV, the Ministry of Foreign Affairs – stop disinformation. The National Council has also specified the type of cases that should be reported to these bodies according to their jurisdiction, indicating the appropriate mailboxes and addresses.

Counteracting hybrid threats in the information sphere

The National Broadcasting Council represents a pivotal component within the state apparatus designed to address hybrid threats in the information domain. In circumstances where such activities are highly probable in Poland, the role of the KRRiT is further augmented.

The escalating hybrid attacks, manifesting as a perpetual information war, have been observed to take various forms. These include the dissemination of disinformation through media

²⁶ See: <https://www.gov.pl/web/krrit/krrit-wyraza-zaniepokojenie-brakiem-zapewnienia-bezpieczenstwa-informacyjnego-i-opublikowaniem-fake-newsow-przez-polska-agencje-prasowa>

²⁷ See: <https://www.gov.pl/web/krrit/krrit-informuje-o-mozliwosci-zglaszania-wszelkich-przejawow-zaklocen-informacyjnych-mogacych-wplynac-na-przebieg-wyborow-do-parlamentu-europejskiego>

channels, the execution of operations in social media using bots or trolls, the transmission of deceptive text messages, and the hacking of email accounts belonging to state authorities. In response to these developments, the National Broadcasting Council (KRRiT) adopted a position on 14 June 2024, wherein it declared its intention to exercise heightened diligence in the granting of licences for the broadcasting of television and radio programmes.

The Broadcasting Act stipulates that applicants for a licence and broadcasters are obliged to ensure that content broadcast on their programmes does not threaten state security. Article 36(2) of this Act enumerates the specific circumstances that constitute grounds for the refusal of a licence. The Chairman of the National Broadcasting Council (KRRiT) does not grant a licence in situations that pose a threat to national security. According to the stipulated provision, a licence shall be refused if the applicant's broadcasting of programmes could potentially compromise the interests of national culture, morality and education, the security and defence of the state, or the security of classified information.

This statutory directive stipulates that the evaluation of entities in the concession procedure should also take this information into account. However, the National Broadcasting Council does not possess the autonomous capability to verify entities with regard to state security and defence.

The National Broadcasting Council has introduced appropriate licensing procedures. Their purpose is to extend the analysis of licence applications in situations where there is a suspicion that the applicant may threaten the state's information security after obtaining a licence.

Furthermore, the law contemplates the possibility of revoking a licence that has already been granted. Article 38(2) of the Broadcasting Act stipulates that a licence previously granted may be revoked if the broadcasting of the programme poses a threat to the interests of national culture, the security and defence of the state, or contravenes standards of public decency. In order to ensure the effective functioning of the system as a whole, it is imperative that the requirements regarding national security and defence be taken into account in relation to broadcasters already airing television and radio programmes.

Influence of Russian intelligence on the environment of journalists and foreign correspondents in Poland

The most striking example of the threat of hybrid warfare in the information sphere is likely to be found in the activities likely to have been undertaken by GRU officer Pablo González, aka Pavel Rubtsov, during his several-year stay in Poland.

According to press reports, his duties included the monitoring of journalists and correspondents, as well as the potential collection of data from their electronic devices.²⁸ There is a risk that the Russian GRU service has obtained a significant amount of data and information about the media environment in Poland in this manner.

²⁸ Cf. the article *'Magnes z Putinem'* ('Magnet with Putin') published on 12 August 2024 on the website Frontstory.pl <https://frontstory.pl/szpieg-gru-pablo-gonzalez-pawel-rubcow-partnerka-zarzuty-rosja/>

In the coming years, this may have consequences for the structure and character of Polish radio and television. Furthermore, it may also have indirect repercussions for the internal and external security of Poland.²⁹

The Chairman of the National Broadcasting Council (KRRiT) has requested that the Prime Minister take action, in consultation with the National Broadcasting Council, to mitigate the risk that public opinion may be influenced in the coming years by individuals under the influence of foreign state services.³⁰

The absence of a response in this instance serves as a pertinent illustration of the disregard for genuine threats, while concurrently exemplifying a notable instance of political ostracism directed towards the National Broadcasting Council, a phenomenon that has been previously delineated in Chapter 2.

4.4 . Media financing and capital concentration in the media markets

The National Broadcasting Council has identified an issue with the Polish media, which is not limited to public media. The problem, as identified by the Council, is the manner in which Polish media outlets are financed. The primary revenue source is advertising, which, in a market characterised by oligopolies, can readily result in informal censorship or a boycott of media outlets deemed politically incorrect. This phenomenon can be attributed to the unique characteristics of media companies, which function as economic entities while concurrently fulfilling significant socio-political roles and exerting a direct influence on the formation of public opinion.

Such situations are becoming increasingly prevalent, as evidenced by the actions of advertisers against television stations *Republika* and *wPolsce24*.

In 2024, the National Broadcasting Council (KRRiT) initiated a project to ascertain the state of concentration in media markets. These markets pertain to the activities of the media themselves, the provision of content they create, and advertising and revenue from pay TV and audiovisual on-demand services (VoD). The results of the analysis indicate a high level of concentration in almost all media markets and a significant impact of large Polish and foreign corporations, whose strong position is, among other things, a consequence of cross-concentration in several segments of the media market, i.e. television, radio, press and telecommunications. This

²⁹ Cf. Speech of 13 August 2024 by the Chairman of the National Broadcasting Council to the Prime Minister <https://www.gov.pl/web/krrit/istnieje-obawa-ze-rosyjskie-sluzby-moga-wplywac-bezposrednio-na-ksztalt-i-charakter-radiofonii-i-telewizji-w-polsce-a-tym-samym-na-bezpieczenstwo-wewnetrzne-i-zewnetrzne-polski>

³⁰ See Article 6(2)(1) of the Act of 29 December 1992 on Radio and Television Broadcasting: *The tasks of the National Council shall include, in particular:*

1) *designing, in consultation with the Prime Minister, the directions of state policy in the field of radio and television broadcasting.*

phenomenon is especially pronounced in instances where the role of a broadcaster is integrated with that of a broker. This state of affairs gives rise to an excess of concentration, which in turn has a deleterious effect on the development opportunities of other content providers and acts as a significant barrier to new market entrants.³¹

The study on the state of concentration is presented in the section entitled *Information on the main problems of radio and television in 2024*.

The European Media Freedom Act (EMFA)³² has imposed obligations on media regulators to protect pluralism, including in the context of concentration and owners' influence on programming, editorial offices and journalists. Entities operating on the media market are obliged to adopt solutions guaranteeing editorial independence, especially in the sphere of information and journalism, and it is the task of regulators to assess their effectiveness. The task of media authorities will also be to maintain databases on media ownership and to systematically analyse their concentration.

In instances where media regulatory authorities are involved in the procedures carried out by competition authorities when granting consent for concentrations, it is essential to consider the role of entities operating within the media market.

4.5. Threats to the development of children and young people in the digital world and large social media platforms as well as artificial intelligence (AI)³³

Some aspects related to the development of digital technologies and the Internet, especially with regard to their impact on the younger generation, were highlighted by Dr Hanna Karp, Professor at the Academy of Physical Education in her study entitled *'The iGen (Internet Generation) generation, influencers and social media overdose – a case study.'*

'...the new media co-create a dynamic environment of existence and various types of interaction, capable of simulating real emotions and forms of communication. New forms of digital communication based on interactivity, virtuality, networking, hypertextuality, convergence and online communication in real time require special self-control from their users. Important aspects of the influence of technology on social communication processes, the expression of emotions and feelings, and relationship building require special attention. Cyberpsychology, which studies the influence of the new media on neurotypical and non-neurotypical human functioning, including the availability of new digital technologies, their miniaturisation, mobility and compatibility with other digital media, all of which favour the development of phenomena characteristic of media exhibitionism and voyeurism; cyber-surveillance linked to cybercrime, cyber-control, cyber-sexuality and cyber-eroticism.'

³¹ See: *Informacja o podstawowych problemach radiofonii i telewizji w 2022 roku*, Warsaw, May 2023, pg. 123.

³² Cf. Chapter 17

³³ See: <https://www.gov.pl/web/krit/cyfrowe-technologie-zawladnely-swiadomoscia-mlodych-pokolen-co-wykorzystuja-globalne-marki-i-rynek-reklamy-mlodzi-uzytkownicy-mediow-spolesnoscowych-niezauwazalnie-traca-wlasna-podmiotowosc-a-po-wykorzystaniu-sa-odrzucon-i-publikacja-czlonka-krit-dr-hab-hanny-karp>

In 2024, the National Broadcasting Council analysed data on the popularity of television among underage viewers. The analysis, which covered the period from 2005 to 2023, confirmed a decline in the number of young viewers watching traditional television. Recent studies have indicated a decline in the average daily television viewing time among children and adolescents. This decline is evident across both younger age groups (4-9 years) and older age groups (10-15 and 16-19 years).

The National Broadcasting Council has expressed the view that issues related to the protection of minors on the web represent the most significant challenge currently, due to the exposure of children and young people to a variety of content on different types of platforms. The utilisation of the mechanisms delineated within the Digital Services Act (DSA) is imperative to facilitate an efficacious response from the regulatory body to the proscribed practices of content providers and digital platforms. This approach stands as the sole effective *modus operandi* to ensure the protection of children and young individuals from the perils inherent in the digital realm. Achieving this objective will necessitate the establishment of a collaborative framework amongst all entities tasked with the monitoring of the implementation of the DSA within the Polish context. It is submitted that the National Broadcasting Council (KRRiT) should assume a leading role in this respect, with the support of the Office of Electronic Communications and other entities subordinate to the Minister of Digitisation.³⁴

5. Research on media content and reception

5.1. Analyses by the National Broadcasting Council (KRRiT) using data from companies on the market

In accordance with Article 6(2)(5) of the Broadcasting Act, the National Broadcasting Council (KRRiT) organises research on the content and reception of media services and video sharing platforms.

The National Broadcasting Council obtains and analyses data from Nielsen Audience Measurement, Kantar Polska, Adres:Media and Mediapanel Gemius on television audiences, radio audiences and the time of use, reach and number of real users of audiovisual media services on the Internet.

Information on the number of television viewers is published in quarterly reports on the website of the National Broadcasting Council (KRRiT).³⁵ The remaining data is used for problem analyses necessary for the ongoing work of the National Broadcasting Council and is also published in the annual Information on the basic problems of radio and television, submitted for consideration together with the the *National Broadcasting Council (KRRiT) report on its activity*.

³⁴ Cf. Chapters 3 and 17.

³⁵ The reports are available on the website at: <https://www.gov.pl/web/krrit/rynek-telewizyjny>

In this year's *Information on the basic problems of radio and television*, the audience ratings can be found in Chapter 2.

5.2. Research of the National Media Institute (KIM) ³⁶

In the fourth year of its existence, the National Media Institute (KIM) concentrated on media research commissioned by the National Broadcasting Council (KRRiT). It is evident that KIM's endeavours were consistent with the primary objective of its inception, namely to provide support for the execution of the regulator's operations, predominantly within the following domains:

- The provision of population data concerning media consumption in Poland is hereby indicated.
- The conceptualisation and execution of research constitutes the primary source of statistical data on the purposes, frequency and methods of media consumption.
- The provision of information pertaining to trends and technologies in media consumption is of paramount importance.
- The process of diagnosis and segmentation of media users in terms of their consumption is of paramount importance.

Founding Study

In 2024, KIM conducted an ongoing founding study over a period of 12 months in the form of interviews with a sample of 15,000 households. The survey was conducted partly by KIM's own network of interviewers and partly by contractors contracted by the Institute. The total number of respondents interviewed was 31,382. More than 45,000 individual interviews were conducted, of which 4,427 were subject to field control.

The results of the survey for the first half of 2024 and previous surveys are available on the Institute's website.³⁷ The results of the survey conducted in the second half of the year will be published in the first quarter of 2025. The Founding Study provides data on the equipment used to receive media and on the behaviour of respondents in terms of electronic media consumption. As this is an ongoing study, it is possible to track changes over time. It is also possible to analyse differences between groups with different demographic profiles, including gender, age and place of residence.

Audio Track audience survey

The Audio Track declarative radio consumption survey was conducted over a period of 12 months with a minimum sample size of 11,900 interviews per month. A total of 147,823 interviews were conducted during the study. In mid-2023, the Institute launched its own telephone research studio and recruited a team of telephone interviewers. In 2024, the Institute successfully conducted about half of the expected number of interviews with its own network of interviewers.

³⁶ The research reports are available on the Institute's website at: <https://kim.gov.pl/wyniki-badan/>

³⁷ Cf. footnote No. 36

The aim of the Audio Track survey was to deepen the knowledge about consumers of audio content, with a special focus on radio, in order to be able to shape the programme offer, building mission and planning advertising activities. The Audio Track survey was conducted using the CATI telephone interview method, on a randomly generated sample (RDD).

Local television audience survey

As part of the Audio Track study, the National Media Institute (*KiM*) conducted a study on the reception of local television stations that started out as cable stations. The publication presents the results of the measurement conducted between July and December 2023. During this time, 113,140 interviews were conducted, thus obtaining a reliable sample for inferences at the national and regional levels.

Construction of a single-source passive panel

In 2024, the Institute built a single-source passive panel to measure the level and nature of media consumption. *KiM* continued its research work, work on the implementation of a telemetry system dedicated to the Institute, and the recruitment for a new panel. A new panel of 1,300 panellists was recruited in the second half of 2024. This was in line with the available budget, although the project was originally planned to be expanded. In the current budgetary situation, following the decision to cut funding for *KiM*, expansion in this area has been completely discontinued since 1 January 2025.

Study of the signal reception of television stations based on Return Path Data (RPD)

This was a statistical research project carried out within the framework of public statistics and implemented by the Chairman of the National Broadcasting Council.³⁸ However, the research was not carried out. The reason for this was the refusal of the operators to provide data, due to the voluntary nature of this obligation and the operators' doubts regarding, among other things, the protection of personal data, the fear of violating the secrecy of telecommunications and their expectations regarding payment for the data provided to the RPD. Difficulties in persuading operators to voluntarily participate in this study led the Chairman of the National Broadcasting Council to request that the draft regulation be amended accordingly. Ultimately, the programme was discontinued at the end of 2024 and the agreement between the National Broadcasting Council and the Institute was terminated. The survey was removed from the list of surveys for 2025.

Research project on the use of artificial intelligence in the monitoring and analysis of media streams

In 2024, the Institute launched a multi-year research project on the use of artificial intelligence, specifically for media market analysis. The aim of the research was to revolutionise the way

³⁸ This authorisation is based on Article 18(1) of the Act of 29 June 1995 on public statistics (Journal of Laws of 2022, item 459, as amended).

media is analysed in Poland by developing an innovative, comprehensive solution that would be fully adapted to the specifics of the Polish market and the applicable legal regulations. The aim was not only to provide tools of the highest quality and functionality, but also to contribute to raising the level of information security in the country, while ensuring the safe and responsible use of media data.

Qualitative research

- Study of the phenomenon of fake news as an element of misinformation in the media – the project included in-depth individual interviews, desk research, netnography and an expert panel. The study aimed to analyse the phenomenon of fake news, in particular the analysis of the perception of revealed false information and the diagnosis of the greatest threats resulting from the dissemination of false information.
- Study of the phenomenon of disinformation – the study was carried out using Bulletin Board Discussion (a moderated online community) and focus group interviews (FGI; N=12). The aim of the project was to examine the perception of the phenomenon and the understanding of the threats arising from it, to analyse the role of the media in disinformation, to analyse the impact of disinformation on security (including succumbing to opinions and comments, building social awareness, antagonising, closing in information bubbles) and to analyse the impact of the phenomenon on trust in the media and the state.
- *Badanie Pokolenie Alfa* (Generation Alpha Survey) - the aim of the survey was to learn about the attitudes and values of the Generation Alpha (i.e. children born after 2010) and, in particular, to define the role of Generation Alpha in the world of media, including answers to the following questions: creators or consumers, how they consume media, who is their guide in the world of media, what authorities they recognise, what lifestyle (leisure, dreams, future) they have, what influences their world view and defining their attitude. The study was conducted by gathering knowledge from children, parents and teachers. The study included affinity groups (in groups of children aged 4-5, 6-8, 9-11 and 12-14), short IDI interviews with parents and expert meetings in the form of in-depth online individual interviews with teachers of different age groups.

5.3. Cooperation with media market organisations

In 2024, the Institute established cooperation with representatives of the media market in the field of the Founding Study and the single-source validation panel being prepared for implementation.

The main organisations with which the cooperation was conducted were: *Komitet Badań Radiowych* (The Radio Research Committee (KBR)), *Polskie Badania Internetu* (Polish Internet Research (PBI)), *Związek Pracodawców Ogólnopolskich Mediów Telewizyjnych* (All-Poland Association of Television Media Employers (MOC TV)), *Związek Pracodawców Mediów Radiowych* (Radio Media Employers' Association (MOC Radio)), *Międzynarodowe Stowarzyszenie Reklamodawców* (International Association of Advertisers (IAA)) and *Stowarzyszenie Komunikacji Marketingowej* (Marketing Communication Association (SAR)). The cooperation has resulted in, among other

things, significant declarations of cooperation and use by the industry, specifically MOC TV using the *KIM* Founding Study as a basis for other research panels in Poland.

5.4. The future of the National Media Institute (*KIM*)

The financial plan for the National Media Institute (*KIM*) for 2025, approved by the National Broadcasting Council and included in the draft budget act for 2025, envisaged the continuation of research projects with continuity of measurement and development of telemetry.

The 2025 financial plan, introduced by the Budget Act, resulted in drastic restrictions on the activities of the National Broadcasting Council and the withdrawal from media research projects. The amendments drafted in parliament and introduced in December 2024 as amendments to the Budget Act drastically reduced the budget of the National Broadcasting Council for the part concerning expenses related to the activities of the National Broadcasting Council, which resulted in the Council being deprived of funds for financing telemetry research and work in 2025.

In light of the aforementioned actions by the legislator, a decision was reached at the Institute to refrain from undertaking any commitments, including the announcement of any tender procedures. Furthermore, a resolution was reached concerning the Institute's restructuring, which entailed the decision to discontinue research activities commencing from January 2025.

Due to the constraints imposed by insufficient funding, the decision was taken to disband the surveyor network and to initiate the liquidation of the telephone interview studio. Following consultation with the relevant supervisory authority, the decision was taken to bring research into the application of artificial intelligence, utilised for instance in the context of media market analysis, to a conclusion.

6. Pluralism in media programming

6.1 DVBT-2 digital terrestrial television

After the conversion process to the new DVBT-2 broadcasting system was completed, 7 public television programmes were migrated to the new MUX-6. This freed up additional slots for licensed broadcasters. After the tendering process, the range of digital terrestrial television channels was expanded: in 2023, the programme *Wydarzenia 24* ³⁹ ('Events 24') in 2024, three more programmes (two news and current affairs programmes: *WPolsce24* and *Republika*, and a specialised film and documentary programme ViDocTV).⁴⁰

Further development of digital terrestrial television will be possible after the President of the Office of Electronic Communications (*UKE*) announces a competition for the MUX-5 operator.

³⁹ The licence was granted back in 2023..

⁴⁰ The original name of this programme was CTV9.

Broadcasters of programmes on MUX-8 may be interested in moving to the newly -launched multiplex due to significantly worse programme distribution conditions. The National Broadcasting Council will decide on the programme offer on MUX-5 after analysing the conditions that the President of the Office of Electronic Communications (*UKE*) will define in his competition and after familiarising itself with the expectations of the audience and their demand for new content.

6.2. DAB+ Digital Audio Broadcasting

The National Broadcasting Council is not planning any new competitions for DAB+ multiplexes for the time being; this may only happen after the war in the east is over. Until the outbreak of war, the concept of replacing FM with DAB+ had technological justification.

At present, the number of individuals in possession of DAB+ receivers within their domestic environment is minimal, whilst the majority of households are equipped with VHF tuners. The situation is marginally improved with regard to digital radio reception equipment in cars, but such equipment is usually only found in newer models, although not in all of them. In 2023, the majority of consumers purchased FM receivers. A mere 6.3% of individuals have procured devices that facilitate the reception of DAB+ multiplexes. The total number of receivers sold at that time was 950,000.⁴¹

The National Broadcasting Council is therefore not planning to reopen the competition for the nationwide DAB+ multiplex. According to the KRRiT, DAB+ can be treated as a complement to FM broadcasting at this stage, but an analysis of the procedure for awarding licences for broadcasting in the digital radio multiplex so far shows that there are not enough applicants to start such an activity.

The National Broadcasting Council has stated that the potential for advancement in the domain of digital radio in Poland is contingent upon a governmental decision concerning the regulations for analogue-to-digital conversion. The establishment of a date for the signal switchover, and the guarantee that analogue programmes are included in the radio multiplexes, can only be achieved through the passing of relevant legislation.

Although DAB+ broadcasting has been in operation since 2019, only the private media channels are available as local programmes.⁴² In 2024, there were 23 such programmes. Some of them are programmes of analogue broadcasters that are broadcast simultaneously in both

⁴¹ Data from GfK Polonia for Wirtualnemedi.pl See: <https://www.wirtualnemedi.pl/arttykul/krrit-fm-dab-maciej-swirski-wylaczenie-nadajnikow-cyfrizacja-radia-wojna-ukraina-rosja-sprzedaz-odbiornikow>

⁴² The DAB+ multiplex of *Polskie Radio SA* (Polish Radio) broadcasts the following Polish Radio programmes: Programme 1 (*Jedynka*), Programme 2 (*Dwójka*), Programme 3 (*Trójka*), *Czwórka*, *RDC - Radio Dla Ciebie*, *Polskie Radio 24*, *Radio Chopin*, *Radio Dzieciom*, *Radio Dla Kierowców*, *Radio Poland*, *Radio dla Ukrainy* as well as 17 regional and 5 city programmes: MC (broadcaster - Radio Poznań), Radio Freee (broadcaster Radio Lublin), Radio Gorzów (broadcaster Radio Zachód), Radio Zielona Góra (broadcaster - Radio Zachód), Radio RAM (broadcaster - Radio Wrocław).

systems (13), and the rest are new digital-only programmes (10). Licensed digital radio multiplexes operate in only 7 Polish cities.

6.3 The local media

The independent media, especially local media, are struggling to access advertising markets and to ensure distribution of their content. These media are marginalised and lose out to large market players due to their significantly weaker negotiating position. They have practically no direct representation in the conclusion of advertising contracts. Consolidation processes involving leading media groups indicate that the independent media have limited opportunities to survive, let alone develop.

The National Broadcasting Council, announcing the possibility of granting new radio and television licences, expects offers that guarantee the emergence of a voice that has been absent from the public debate. In particular, the National Broadcasting Council is consistently working to develop local radio, ensuring the plurality of information, including at the local level. Local radio programmes offer listeners access to high-quality content and its share of the programme format. Such programmes guarantee independence and diversity in the radio offering. Therefore, when announcing the possibility of granting licences for the broadcasting of programmes using new frequencies, the National Broadcasting Council (KRRiT) formulates the clear expectation that interested parties will meet the conditions of a local broadcaster.

Information on the new local licences granted in 2024 is presented in [Chapter 14](#).

The Broadcasting Act does not define the term ‘local broadcaster’. Therefore, the National Broadcasting Council cannot rule out the possibility that applications from radio groups such as ZPR, RMF, AGORA and Eurozet will not be submitted in the licensing procedure. If local companies are unable to meet the tender requirements, the National Broadcasting Council is forced to select a concessionaire from among the companies involved in the programme network. Although the radio groups that receive licences in such circumstances are obliged to guarantee the presence of local issues in the programme, they are still not interested in creating original content beyond what is required by the licence. This leads to the standardisation of programmes across the country through centralised editorial offices.

In its report last year, the National Broadcasting Council wanted to protect the local broadcasting market and called for the creation of a quality fund that local broadcasters could use for the production of unique radio programmes. However, this voice was not heard, nor was the demand to clarify the Broadcasting Act by defining a ‘local broadcaster’. As a result, despite the efforts of the National Broadcasting Council, the local radio market is increasingly at risk.

Local television broadcasters are also in a difficult situation. The National Broadcasting Council commissioned the National Media Institute (*KiM*) to conduct a study on television distributed as part of cable operators' offers. These broadcasters are not covered by regular

market audience research conducted for the purpose of creating advertising offers by companies such as Nielsen or Kantar. The research report was published in August 2024.

The results of the survey show that local television viewers make up a significant proportion of the total audience. *KIM* also asked respondents whether they would subscribe to local television.⁴³

More information on *KIM* research on the reception of local television can be found in the section entitled *'Information on the basic problems of radio and television in 2024'*.

7. Combatting disinformation

7.1. Disinformation as part of Russia's hybrid warfare

The KRRiT's activities based on the declaration of 4 October 2023 on cooperation in counteracting disinformation signed in Warsaw with regulators from Central and Eastern Europe

The KRRiT, together with foreign partners – media regulators from Lithuania, Romania and Ukraine – exposed Russian lies and propaganda in an interview with Vladimir Putin by American journalist Tucker Carlson, published on the social network site 'X' and YouTube on 9 February 2024. The interview contained numerous lies and disinformation about the history of Poland, Ukraine and Central and Eastern Europe. The material was shared with other media outlets and viewed by many millions of people around the world.

This case was the subject of a special statement that members of the regulatory bodies of these countries, acting on the basis of a declaration on cooperation in counteracting disinformation, presented to the European Commission and other European regulators during the EPRA conference in Rotterdam on 5 June 2024. The National Broadcasting Council, together with the Lithuanian, Romanian and Ukrainian regulators, recommended that their counterparts in Europe take decisive action to protect citizens from Russian disinformation and warned of the dangers of accessing Russian-language media in Europe.

A request to the Prime Minister to take joint action to prevent the co-shaping of public opinion by persons under the influence of the services of a foreign state

On 13 August 2024, the Chairman of the National Broadcasting Council (KRRiT) sent a letter to Prime Minister Donald Tusk regarding joint action to be taken to

⁴³ For more information, see the report entitled: Local TV coverage <https://kim.gov.pl/wyniki-badan/page/2/>

protect Polish radio and television from the activities of Russian services that pose a threat to the country's security. The Chairman of the National Broadcasting Council pointed out that a GRU agent had been monitoring journalists and correspondents and could have been collecting data from their electronic devices. In this situation, the Chairman of the National Broadcasting Council asked the Prime Minister to take action, in consultation with the National Broadcasting Council, to prevent the aforementioned risk. Without taking appropriate action, there is a reasonable fear that in the coming years public opinion may be co-shaped by persons under the influence of the services of a foreign state.

The publication of fake news by the Polish Press Agency and lack of information security at the Polish Press Agency

The National Broadcasting Council has called on those responsible for the security of IT infrastructure in the media to carry out constant checks to eliminate the risk of hacking. On 31 May at 2:00 p.m., the Polish Press Agency (PAP) broadcast a false high-priority news bulletin claiming that a partial military mobilisation was to take place in Poland. The news was withdrawn from the website a few minutes later, then re-sent, then withdrawn again, and PAP issued a statement saying that the news was false. The fact that the largest Polish news agency had been hacked caused the greatest concern. It should be remembered that PAP is a public media organisation, the authorities of which were illegally changed by a decision of the then Minister of Culture and National Heritage on 19 December 2002, and the organisation itself was put into liquidation.

Fake news has become a common phenomenon available in all media, characterised by rapid spread and emotional connotations. The National Media Institute (*KIM*) reported on how to counter the spread of disinformation in a report entitled '*Fake news*', based on qualitative research. The *KIM* report also indicated recommended systemic solutions to counteract disinformation.⁴⁴

Appeal of the National Broadcasting Council to report any information disruptions that may affect the course of the European Parliament elections

In connection with attacks on the IT infrastructure of the Polish Press Agency, the National Broadcasting Council encouraged citizens to report any incidents of a disinformation nature. Cyberattacks and disinformation are classic activities aimed at weakening the state and achieving intended goals. Reliable information, especially during the election period, is essential for maintaining state security.⁴⁵

Participation of the National Broadcasting Council in national activities to strengthen the fight against disinformation

⁴⁴ Cf. information on *KIM*'s activities and the studies carried out in Chapter 5.

⁴⁵ Cf. Chapter 4

The National Broadcasting Council took part in regular meetings organised by the Ministry of Foreign Affairs on counteracting disinformation in connection with the European Parliament elections. The aim of the meetings was to exchange information, integrate activities and strengthen inter-ministerial cooperation. It was also important to mobilise efforts to raise public awareness within the scope of disinformation.

By getting involved in these activities, the National Broadcasting Council (KRRiT) appealed to public and commercial broadcasters to inform radio and television programmes, as well as internet services, about the mechanisms for reporting incidents of disinformation to relevant state institutions. After the parliamentary elections, the Ministry of Foreign Affairs continued to hold coordination meetings on counteracting disinformation in connection with the preparations for Poland's presidency of the EU Council. The National Broadcasting Council also participated in these meetings.⁴⁶

7.2. Position of the National Broadcasting Council on the role of the National Council in a situation of hybrid war⁴⁷

The intensifying hybrid attacks and the open border conflict on the country's eastern border, which constitute an important element of the Russian Federation's policy towards the West, are taking the form of a permanent information war after the attack on Ukraine in 2022. According to the National Broadcasting Council, there is a reasonable fear that these actions may even constitute preparation for a full-scale conventional conflict in Europe. This assessment of the Russian Federation's actions is shared by Polish and EU security representatives.

A characteristic feature of hybrid activities is, among other things, aggressive information and psychological operations based on disinformation. This situation requires both politicians and the National Broadcasting Council, as the regulator of the media market, to exercise particular caution in the information sphere.⁴⁸

7.3. Artificial Intelligence – opportunities and threats

Increasingly, generative systems and synthetic technology are becoming the basic journalistic tools, as they have the ability to automate content creation, recognise voice and speech, manage personalised information channels and analyse huge amounts of data in real time.

The technological immaturity of AI requires constant vigilance and situational assessment as well as risk mitigation. For this reason, coordinated measures to prevent and mitigate risks have been taken at the EU level, an important manifestation of which is the adoption of the Artificial

⁴⁶ Cf. Chapter 4

⁴⁷ Position of the National Broadcasting Council (KRRiT) of 14 June 2024

See: <https://www.gov.pl/web/krrit/stanowisko-krrit-w-sprawie-roli-krajowej-rady-in-a-hybrid-war-situation>

⁴⁸ See: Chapter 4

Intelligence Act ⁴⁹ on 21 May 2024. Legislative measures are therefore aimed at protecting human rights, the rule of law and democracy in the context of the impact of AI.

In order to supervise the implementation of fundamental rights, media authorities need an easy-to-manage set of tools and an infrastructural environment. For this reason, the Chairman of the National Broadcasting Council initiated analytical work on the creation of a concept for an artificial intelligence tool that would exercise control in the area of freedom of speech and the right to reliable information. In preparation for the implementation of such a solution, the National Media Institute was commissioned to carry out relevant research. ⁵⁰

This work was terminated due to the parliamentary majority's decision to discontinue funding for the National Media Institute's (*KIM*'s) activities.

8. The legal responsibility of broadcasters

8.1. Handling of complaints and requests

In the reporting year, a total of 5,144 complaints and requests were received, of which:

- 2,624 complaints, signed by 26,656 people, concerned the report entitled: *'29 years of impunity. The Father Tadeusz Phenomenon'*, published on the TVN24 GO website;
- 1,112 complaints, signed by 14,381 people, concerned the programme *'Czy PiS odpowie za finansowanie Rydzyka?'* ('Will the PiS party be held accountable for financing Fr Rydzyk?'), broadcast on 10 October 2024 as part of the series *'Niebezpieczne związki'* ('Dangerous Liaisons') on TVP Info;
- 98 complaints, signed by 312 people, concerned the programme entitled *'Arcydzieło Rydzyka'* ('Rydzyk's Masterpiece'), broadcast on 13 December 2024 as part of the *'Raport specjalny'* ('Special Report') series on TVP 1.

The vast majority of the complaints/comments concerned the TV and radio programme. In 2024, this accounted for almost 72% of all comments. In addition, 13% of individual complaints/comments concerned issues related to the radio and television subscription fee and the financing of public media, content available on video sharing platforms, licensing issues, advertising and the activities of the National Broadcasting Council and its chairman. Another 5% of the complaints/comments were about technical problems with programme reception, HR issues in public and licensed media companies, the functioning of VoD services and competitions organised by broadcasters. Ten percent of the statements did not fall within the competence of the National Broadcasting Council (these included comments on the current political situation in Poland and in the world, comments on press articles and online

⁴⁹ EU Regulation 2024/1689 of the European Parliament and Council of 13 June 2024 on establishing harmonised rules on artificial intelligence.

⁵⁰ Cf. Chapter 5 and the section entitled: *'Information on the basic problems of radio and television in 2024'*.

publications, opinions on the content published on social media). Thirteen statements were referred to other bodies in accordance with their competence.

A total of 293 explanatory procedures were initiated in connection with complaints containing references to specific broadcasts or other transmissions which may have infringed on the provisions of the Broadcasting Act. The majority of these, 35%, concerned journalistic programmes, 23% concerned the content of news programmes, 20% concerned the insufficient protection of minors and 8% concerned the use of profanity in various programmes. Investigations into specific programmes that violated regulations on broadcasting commercial programmes accounted for 4% of all investigations. The remaining 10% of investigations concerned, among other things, the offence of religious feelings, morally controversial content, and the inaccuracy of the presentation of historical facts in films.

As a result of the investigations, the Chairman of the National Broadcasting Council issued 15 decisions to impose financial penalties on broadcasters, including:

- 4 decisions in connection with violations of regulations on the protection of minors (programmes: TVPuls - 2 decisions, TVP - 1 decision, Polsat - 1 decision);
- 4 decisions in connection with the broadcasting of profanity (TVN – 1 decision, Radio TOK FM – 1 decision, Polsat – 1 decision, TVP – 1 decision);
- 4 decisions in connection with the violation of regulations governing the broadcasting of commercial messages (TV Mazowsze – 3 decisions, Telewizja WTK – 1 decision);
- 3 decisions in connection with the broadcast of messages promoting activities contrary to law, morality and social good (TVN – 2 decisions, Radio TOK FM - 1 decision);

In addition, the Chairman of the National Broadcasting Council issued a decision imposing a fine on the liquidator of *Telewizja Polska SA* in connection with the failure to provide information at the request of the Chairman of the National Broadcasting Council, made pursuant to Article 10(2) of the Broadcasting Act.

In 2024, the Chairman of the National Broadcasting Council (KRRiT) initiated six administrative proceedings to impose fines on broadcasters following reports from viewers.

Pursuant to Article 10(3) of Act,⁵¹ the Chairman of the National Broadcasting Council (KRRiT) sent 31 summons and warnings to broadcasters, of which:

- 14 concerned reliability and objectivity in news and current affairs programmes (TVN – 4, TVP – 2, TV Republika – 2, TOK FM – 2, Polsat – 1, Polskie Radio – 1, RMF FM – 1, Radio Zet – 1);
- 10 – protection of minors (Polsat - 4, TVP – 2, TVN - 2, Polskie Radio – 1, 4Fun.TV – 1);

⁵¹ Article 10 (3) of the Broadcasting Act states that the Chairman of the National Broadcasting Council (KRRiT) may call on a media service provider to cease providing media services if they violate the provisions of the Act, the resolutions of the National Broadcasting Council or the terms of the licence.

- 5 – the use of profanity (Polskie Radio – 2, TVP – 1, TV Republika – 1, Akademickie Radio Kampus – 1);
- 2 – offence to religious feelings (Polskie Radio - 1, Radio Zet – 1).

In 2024, 3 proceedings conducted in cooperation with foreign regulators were completed:

- in connection with the broadcast of the film *‘Rimini’* on the Cinemax 2 channel. After the proceedings, the Czech regulator (RRTV) informed the Polish National Broadcasting Council (KRRiT) that the broadcaster had removed the film from the broadcast list;
- in connection with the broadcast of the film *‘In the Basement’* on the Cinemax 2 channel, the Czech Regulatory Authority (RRTV) informed the National Broadcasting Council (KRRiT) that the film had been taken off the list by the broadcaster, following the conclusion of the procedure;
- in connection with the broadcast of the film *‘Ammonite’* on Filmbox Premium HD, the Spanish regulator (CNMC) announced that it had initiated a sanctioning procedure against the broadcaster.

8.2. Sanctioning violations.

In accordance with his statutory powers, the Chairman of the National Broadcasting Council imposed 72 fines in 2024, following an administrative procedure in which the broadcasters were guaranteed all the rights of the party to the procedure. The penalties imposed covered various violations listed in Chapter 8 – The legal liability of broadcasters, in particular in Article 53(1) of the Broadcasting Act. This provision is obligatory and does not depend on the will of the authority, but is exclusively related to the fact of violating the law. Among the violations, the law lists those that, among other things, concern the presence in the programme of specific broadcasts through which the so-called programme quotas are implemented, e.g. broadcasts with facilities for disabled people or broadcasts produced in Polish. Another group of violations is related to non-compliance with regulations governing the activities of broadcasters in the field of advertising and sponsoring. The provisions of Article 18 regulates important issues related to the protection of minors, but also refers to the prohibition of promoting activities contrary to law, morality, social good, Polish *raison d'état*, and refers to the prohibition of inciting hatred, violence, discrimination, or undertaking activities related to disinformation.

In 2024, the Chairman of the National Broadcasting Council issued 72 decisions imposing financial penalties in the total amount of PLN 2,165,626.45, of which 32 penalties concerned various aspects of advertising and sponsorship activities, 8 penalties were related to the protection of minors from content harmful to their development, 4 fines were imposed for the use of profanity in violation of the statutory requirement to protect the Polish language, 12 fines were imposed for failure to comply with the provisions on facilities for the disabled, 3 fines were imposed for hate speech in broadcasts, 2 fines were imposed for the dissemination of pornographic content, 7 fines were imposed for failure to register on-demand audiovisual media services, 4 fines were imposed for violation of European quota regulations.

Statistics on penalty decisions:

- 8 decisions were related to violations found in programmes broadcast by Polsat (total fines of PLN 172,000);
- 7 decisions concerned programmes of *Telewizja Polska* (total amount of penalties: PLN 82,000);
- 6 decisions concerned *Biznes 24* (total amount of penalties: PLN 20,400);
- 5 decisions concerned Michał Winnicki Entertainment (total amount of penalties: PLN 9,500);
- 4 decisions concerned the company TVN SA (a total of PLN 747,326.45);
- 3 decisions concerned the company *TV Republika* (a total of PLN 29,000);
- 3 decisions concerned the company Canal+ (a total of PLN 13,200);
- 3 decisions concerned the company TV Puls (a total of PLN 65,000);
- 3 decisions concerned the business entity Foto-Jakowscy (a total of PLN 8,000);
- 3 decisions concerned the company Golf Zone Sp. z o.o. (a total of PLN 4,300);
- 2 decisions concerned the company Federacja Gromda F.C. Sp. z o.o. (a total of PLN 100,000);
- 2 decisions concerned the company Inforadio Sp. z o.o. (a total of PLN 98,000);
- 2 decisions concerned the company MF CASH Sp. z o.o. (a total of PLN 180,000);
- 2 decisions concerned the company Red Carpet Media Group (a total of PLN 30,000);
- 2 decisions concerned the company R.D.F. Entertainment Sp. z o.o. (a total of PLN 11,000);
- 2 decisions concerned the company Motowizja Sp. z o.o. (a total of PLN 4,300).

The remaining penalties were one-off and the punished parties included the liquidator of TVP SA (a penalty of PLN 145,200 for failure to provide information as stipulated in Article 10(2) of the Broadcasting Act).

Information on the decision to impose a penalty for failure to fulfil the above obligations can be found in **Attachment No. 1**.

The penalties imposed are subject to judicial appeal. Each decision may be the basis for a complaint by the broadcaster to the administrative court. The penalties only cover those violations that the law categorises as punishable by a financial penalty. The law explicitly states that the Chairman of the National Broadcasting Council (KRRiT) as a body imposes penalties after conducting proceedings. The President of the Office of Competition and Consumer Protection (UOKiK) or the President of the Office of Electronic Communications (UKE) have similar powers.

In addition to fines, the Chairman of the National Broadcasting Council (KRRiT) used other statutory measures, including warnings and summonses, which he issued in a total of 31 cases.

The opinions and allegations of suppressing public debate and creating a chilling effect in the media are completely unfounded in this legal and factual context.

8.3. Hate speech and discrimination for religious beliefs in the report *'32 years of impunity. The Fr Tadeusz phenomenon'*

On 20 November 2024, the Chairman of the National Broadcasting Council issued a decision to impose a financial penalty of PLN 142,800 on TVN SA for broadcasting content inciting hatred and discrimination on the basis of religious beliefs in a report entitled *'29 years of impunity. The Fr Tadeusz Rydzyk phenomenon'*. The report was published on the YouTube platform, on the profile of the series entitled *'Czarno na białym'* (Black on white) and on the TVN24 GO website. A total of 2,624 complaints were received from recipients in connection with the programme, with 26,656 signatures.⁵²

The analysis showed that the topics discussed, which described the activities of Fr Tadeusz Rydzyk and the Radio Maryja audience, were intended to arouse resentment among the audience and show the priest in a negative light. The statements made by Fr Tadeusz Rydzyk, as well as various events related to his activities, were presented out of context. They were used to support further claims made by the author of the report without any documentation and in a one-sided manner, in order to arouse resentment among the audience and provoke exclusively negative opinions.

During the proceedings, it was established that the programme used typical manipulative measures, such as quoting statements taken out of context and spreading lies about matters that had long ago been clarified. Many stereotypical views about Radio Maryja were mentioned, and to support the arguments, excerpts from a stage play, and therefore fiction, by Marcin Kącki, one of those whose statements were presented as factual findings in the reportage, were used. It was established that by publishing material containing hate speech and discrimination based on religion or belief, political or any other opinion, the company violated Article 47h of the Broadcasting Act.⁵³

9. Implementation of selected statutory tasks by broadcasters

9.1. Programmes with facilities in television programmes and VoD services for people with visual or hearing impairments

⁵² See: <https://www.gov.pl/web/krrit/spolka-tvn-ukarana-za-emisje-tresci-nawolujacych-do-nienawisci-i-dyskryminujacych-z-uwagi-na-przekonania-religijne-w-reportazu-pt-32-lata-bezkarnosci-fenomen-ojca-tadeusza>

⁵³ ...an entity providing an on-demand audiovisual media service violates the obligation resulting from the provision of Article 47h of the Act on Broadcasting, the Chairman issues a decision imposing on it a financial penalty of up to twenty times the average monthly remuneration in the enterprise sector, including payments from profit, in the quarter preceding the issuance of the decision imposing the penalty, announced by the President of the Central Statistical Office in the Official Journal of the Republic of Poland *'Monitor Polski'*.

In 2024, The National Broadcasting Council (KRRiT) audited the reports of broadcasters regarding the provision of facilities in television programmes in the previous year.⁵⁴ The provisions of the Act stipulate that facilities for people with visual or hearing impairments in television programmes are present in at least 50% of the quarterly broadcasting time of the programme, excluding commercials and teleshopping. The legislator has provided for a transitional period for the implementation of this provision from 2019 to 2024. In 2023, television broadcasters had to ensure that at least 35% of programmes had accessibility features. The detailed conditions for the use of accessibility features are laid down in a KRRiT Regulation.⁵⁵

One hundred and thirty nine (139) broadcasters were obliged to submit reports. In 129 programmes, the obligation to include facilities was fulfilled in all four quarters of 2023, while in 10 programmes, the share of facilities was found to be too low in at least one quarter. Information on the penalty decisions in connection with non-compliance with the above obligations can be found in [Attachment 1](#).

Overall, the average proportion of facilities in television programmes in 2023 was 43.5% of broadcasting time excluding advertising and teleshopping, with the proportion of facilities for people with visual impairments being 10.8% and for people with hearing impairments 32.7%. The data collected shows that in the most-watched programmes, with an audience share of more than 1%, and therefore particularly attractive to people with disabilities, the proportion of accessibility measures reached almost 62%. In this category, 46.8% of the programme's broadcasting time (excluding commercials and teleshopping) was taken up by programmes with subtitles for the deaf or sign language interpretation, and more than 15.1% of the broadcasting time was taken up by programmes with audio description.

Compared to 2022, the average proportion of accessibility features in television programmes increased by 3.9 percentage points, with the proportion of accessibility features for people with visual impairments increasing by 0.9 percentage points and the proportion of accessibility features for people with hearing impairments increasing by 3.0 percentage points.

⁵⁴ Pursuant to Article 18a(1b) of the Act, broadcasters are required to submit these reports by 31 March for the previous year.

⁵⁵ The regulation of 13 April 2022 on facilities for people with disabilities in television programmes (Journal of Laws of 2022, item 982) specifies: the type of facilities, their share in broadcasting time depending on the time of broadcast and the nature of the programme, the type of programmes for which broadcasters are not obliged to introduce facilities, a lower share of facilities than that specified in Article 18a(1) in programmes with a low audience reach, a small audience share or those distinguished by their method of distribution and specialisation, and the method of broadcasting and specialisation. 1 share of facilities in programmes with a low population coverage, a small audience share or those distinguished by their method of dissemination and specialisation, and the method of informing the National Broadcasting Council and the audience about the date, broadcast time and duration of programmes containing facilities. According to the regulation, the following proportion of accessibility features was required in 2023: in children's programmes - 14% audio description, 21% subtitles for the deaf or sign language interpretation, in music or news programmes - 17.5% subtitles for the deaf or sign language interpretation, in sports programmes - 3.5% audio description, 14% subtitles or sign language, in other programmes - 5% audio description, 30% subtitles or sign language. Furthermore, in programmes with an audience share of less than 1% or in which the total broadcasting time of advertising and teleshopping does not exceed half of the statutory limit, the minimum proportion of each type of facility is reduced proportionally so that they together occupy at least 17.5% of the broadcasting time excluding advertising and teleshopping.

Providers of on-demand audiovisual media services are obliged to ensure that at least 30% of the programmes in their catalogue have accessibility features. This obligation does not apply to catalogues whose number of catalogue users did not exceed 2 million in the previous calendar year. VoD providers must submit information on the fulfilment of this obligation to the National Broadcasting Council as part of their annual report by 31 March covering the previous year.

One hundred and fifty one (151) reports from providers of on-demand audiovisual media services entered in the list of the Chairman of the National Broadcasting Council (KRRiT) that were subject to the reporting obligation in 2023 were audited. The inspection showed that in 7 cases, the VoD provider provided audio description for people with visual impairments, at least in part of its offer. According to the reports, 13 VoD services provided facilities for the hearing impaired, one of which offered sign language interpretation and subtitles for the deaf, while the others only offered subtitles.

9.2. Emergency announcements in a manner accessible to people with disabilities in connection with the risk of flooding

Due to the needs of people with visual or hearing impairments in connection with the flood emergency in 2024, the Chairman of the National Broadcasting Council issued an announcement,⁵⁶ in which he reminded broadcasters of their obligations to ensure that viewers with disabilities have access to emergency information. This announcement was also sent directly to broadcasters distributing nationwide news programmes.

The National Broadcasting Council inspected specialised news programmes: TVP Info, TVN 24, Polsat News, Republika, wPolsce24. The inspection covered the period from 13 to 20 September 2024. This period allowed for checking how the threat was reported when the state of natural disaster was not yet in force. It was already obvious that the inhabitants of the endangered areas, together with the rescue services and local authorities, would have to face so-called flash floods. It was also clear that the media fulfilled their information obligations a few days after the entry into force of the Regulation of the Council of Ministers of 16 September 2024 on the introduction of the state of natural disaster. Flash floods and how the media fulfilled their information obligations a few days after the entry into force of the Regulation of the Council of Ministers of 16 September 2024 on the introduction of a state of natural disaster in parts of the *Dolnośląskie* (Lower Silesian), *Opolskie* (Opole) and *Śląskie* (Silesian) Voivodeships. It is a fact that almost all programmes broadcast between several dozen and several hundred hours of programmes with subtitles for the deaf or sign language interpretation. Key messages about the danger or the need for evacuation were also broadcast in text form, in the form of so-called tickers and information strips.

⁵⁶ See: <https://www.gov.pl/web/krrit/komunikat-przewodniczacego-krrit-do-nadawcow-telewizyjnych-w-sprawie-dostepu-do-informacji-dla-osob-z-niepelnosprawnosciami>

Only the *wPolsce24* programme presented a different situation. The broadcaster explained the lack of possibility to implement the facilities in live broadcasts for technical reasons and organisational changes in the functioning of the television studio and editorial team, as well as the too short period of functioning after receiving the licence. The programme was launched on 2 September 2024, just two weeks before the entry into force of the Regulation of the Council of Ministers on the state of natural disaster.

The results of the inspection were forwarded to the Ombudsman for information in connection with his request to the National Broadcasting Council (KRRiT) for information on the fulfilment of statutory obligations by broadcasters and the monitoring by the KRRiT of the programme activities of broadcasters in connection with the flood risk.

9.3. Promotion of works in the Polish language and European works

Works in the Polish language

According to Article 15(1) of the Broadcasting Act, television broadcasters must allocate at least 33% of quarterly broadcasting time, excluding news, advertising, teleshopping, sports broadcasts, text messages and game shows, to programmes originally produced in Polish. Similarly, radio broadcasters are to allocate at least 33% of their monthly music broadcasting time to songs performed in the Polish language, with at least 60% of this time being between 5:00 a.m. and midnight (Article 15(2) of the Act).⁵⁷

An inspection of ninety-three (93) television programmes showed that the majority of programmes broadcast were in Polish. Overall, the average annual share of these programmes was 72%, well above the minimum required by law. Only one broadcaster (Golf Zone Sp. z o.o. – the broadcaster of the Golf Zone programme) did not meet the statutory requirement for the share of programmes in Polish, which resulted in the Chairman issuing a decision to impose a financial penalty.⁵⁸

The inspection of radio programmes in terms of the share of music and lyrics performed in Polish covered 352 programmes. In total, the average monthly share of songs performed in Polish was 40%, with an average of 69% of the time for songs performed in Polish taken up by songs broadcast between 5:00 a.m. and midnight. Programmes called ESKA 2, belonging to the Time Radio Group, broadcast only songs in Polish. Among other programmes, the highest percentage of songs in Polish was recorded by Radio Pogoda, a programme belonging to the AGORA Radio Group specialising in old hits (77%), socio-religious programmes not belonging to the Radio Plus network (54%) and Polish Radio programmes (49%). The lowest share of Polish songs was found in programmes from the Meloradio network, which belongs to the Eurozet group (33%).

⁵⁷ In special cases, the KRRiT regulation provides for a lower share of such works in both television and radio programmes.

⁵⁸ Cf. [Annex 1](#)

Promotion of European productions

In order to support European film production, television broadcasters are obliged to devote at least 50% of their quarterly broadcasting time, excluding news, advertising, teleshopping, sports broadcasts, text messages and game shows, to European programmes (Article 15(3) of the Act). In addition, broadcasters are required to promote programmes produced by independent producers.⁵⁹

In 2024, ninety-three (93) television programmes were monitored on the basis of broadcasters' reports containing information on the broadcasting time of European programmes, including European programmes by independent producers. The average annual proportion of European programmes in the audited programmes was 87%, the average annual proportion of European programmes by independent producers was 39%, and the average annual proportion of European programmes by independent producers produced within the last five years was 23%. Only two TV broadcasters (the broadcasters of the programmes TOP KIDS and GolfZone) did not meet the requirements for broadcasting European programmes.⁶⁰

VoD providers were audited for the promotion of European works based on reports for the previous year. In 2023, information was collected from 151 VoD providers, listed in the register of providers maintained by the Chairman of the National Broadcasting Council, who submitted annual reports within the statutory deadline. In the case of 95 VoD catalogues, the supplier declared that it was exempt from the obligation to promote European programmes.⁶¹ The reason most often given was that the scale of activity on the market was too small.

The share of European programmes in the remaining catalogues averaged 83%. The obligation to promote European programmes was also fulfilled by indicating the country of origin of the programme (in 33 catalogues), providing the possibility to search for European programmes (in 36 catalogues), including additional materials promoting European programmes (in 36 catalogues), and highlighting European programmes in the catalogue (in 43 catalogues).

⁵⁹ Article 15a.1. Television broadcasters shall reserve at least 10% of their quarterly transmission time for European programmes produced by independent producers, excluding news, advertising, teleshopping, sports events, teletext services, and games. 2. Television broadcasters shall reserve at least 5% of their quarterly transmission time for European programmes produced by independent producers during the period of 5 years prior to transmission in the programme service, excluding news, advertising, teleshopping, sports events, teletext services, and games.

⁶⁰ Cf. Annex 1

⁶¹ The obligation to reserve at least 30% of the catalogue content for European programmes does not apply to catalogues in which only audiovisual programmes that are not European programmes are made publicly available, to providers of on-demand audiovisual media services that are microenterprises within the meaning of Article 7(1)(1) of the Act of 6 March 2018 - Law on Entrepreneurs, entities providing on-demand audiovisual media services, whose number of users of all publicly available on-demand audiovisual media services in the previous calendar year did not exceed 1% of subscribers to data transmission services providing broadband Internet access (see Article 47f(4) of the Broadcasting Act).

9.4. The protection of minors

Protection of minors in television programmes

The National Broadcasting Council (KRRiT) carries out regular checks to ensure that media service providers fulfil their obligations regarding the protection of minors.⁶² These include scheduled checks, carried out in connection with ongoing licensing proceedings, and additional checks carried out according to current decisions of the National Broadcasting Council. In 2024, TV broadcasters that distribute programmes via digital terrestrial television as well as cable and satellite broadcasters were subject to this additional control.

In 2024, weekly tests of 30 programmes were carried out during the monitoring of broadcasters' compliance with the rules on the protection of minors, and no violations were found.

Protection of minors on VoD platforms

Like TV broadcasters, video-on-demand (VoD) providers are obliged to apply age rating labels to their content. This obligation also applies to audiovisual content on video-sharing platforms (VSPs). VoD providers must also use labels for content intended for users aged 18 and over that may negatively affect minors (e.g. sex, violence, profanity). They are also obliged to use effective technical measures to prevent minors from viewing harmful content. In 2024, the National Broadcasting Council (KRRiT) conducted an inspection of the most popular VoD services under Polish jurisdiction, including Megogo.pl, Player.pl, Vodtv.pl, Canal+ Online, CDA.pl, and Redgo.pl. More than 50 programmes were inspected on each of the services. On the websites of four providers, programmes were found that could endanger minor users due to their inappropriate age rating or lack of labelling of content that could have a negative impact on the development of minors. In this regard, a total of five warnings were sent to the providers, with the threat of a fine in the event of non-compliance. The providers complied with the warnings immediately.

Protection of minors on VSP platforms

In 2024, 12 requests were sent to platform providers asking for explanations and to present the technical solutions used to enable users to classify content. Two providers on two video-sharing platforms had created and operated parental control systems. Only four providers allowed users

⁶² First and foremost, in terms of compliance with the so-called protected time, i.e. the ban on broadcasting content that may be harmful to the physical, mental, and moral development of minors on television and radio between 6:00 a.m. and 11:00 p.m. The checks also concern the use of correct age ratings in television programs (and in the case of programs “for ages 18 and over,” also the labeling of types of content that may have a negative impact on minors), on the basis of which parents and guardians can decide whether a child should be exposed to the content presented in a given program.

to apply age ratings in accordance with the provisions of the KRRiT regulation.⁶³ These were the BanBye, Wgrane, Kwejek and the Jbzd platforms.

Providers who had not yet implemented appropriate technical protection systems⁶⁴ reported that they had started to work on solutions such as a parental control system and tools for content classification. In two cases, such solutions were introduced completely from scratch.

VSP websites allow users to rate their own content before uploading it to the platform. At this stage, users uploading content to the platform have the option of marking the content as unsuitable for minors. A warning is displayed before the content is broadcast. Some providers only upload the content after it has been reviewed by a site administrator.

All platforms use a contact form for ex post reporting of violations of the terms and conditions. This system refers to the verification of video material and comments posted by users other than those who posted the material. Administrators verify whether the report is justified and then the files are usually blocked. When uploading material from the social media platform YouTube, the providers point out that this platform uses its own classification system.

Protection of minors (so-named ‘YouTubers’) on the channels

In the reporting year, the content made available on YouTube channels by so-called YouTubers was also analysed. The content made available on 43 channels was analysed, comprising a total of 211 programmes in the form of, for example, instructional videos, interviews with influencers, music videos and life reports, i.e. so-called vlogs.

In the vast majority of cases, no violations of Article 47e (1)-(3) of the Act were found. However, in the broadcasts and other transmissions under the common name *Alkomaster 2 - Wesele* (Alkomaster 2 - Wedding), which was available in one of the catalogues on the YouTube platform in parallel with the pay-per-view broadcast, promoted, among other things, pathological behaviour related to alcohol consumption, aggression and humiliation of others, i.e. an infringement of Article 47e(1) of the Act by making publicly available content that endangers minors without using effective technical protection measures.

The Chairman of the KRRiT issued two decisions sanctioning the provider for advertising and promoting alcohol, making available harmful and pathological behaviour patterns related to alcohol consumption, aggression and humiliation of others without applying effective safeguards for the protection of minors, and failing to provide users with easy, direct and continuous access

⁶³ See the Regulation of the National Broadcasting Council of 13 April 2022 on the classification and labelling of broadcasts, user-generated videos and other content that may have a negative impact on the development of minors in specific age categories on video-sharing platforms (Journal of Laws, item 1019).

⁶⁴ The most common security measure used by VSP providers was a message asking the user to confirm that they were of legal age. This solution does not meet the effectiveness criterion.

to information allowing identification of the service and the entity providing the on-demand audiovisual media service.⁶⁵

On the basis of the other content analysed, which was available in the catalogues of other providers, at least two trends in the work of YouTubers have been identified which, if they continue to grow in popularity, may have a negative impact on minors' construction of social relationships and self-image in the future. The first of these trends relates to programmes that show ways of choosing a partner. Most of this type of material used a reality show format, where participants had to make choices (often mainly or exclusively based on physical characteristics), but also between a potential relationship and a promised financial reward. Challenge-based formats, on the other hand, presented participants with food-related tasks (e.g. using different tools or consuming a certain number of calories). Both the aforementioned dating and food challenge formats may contribute to the perpetuation of behavioural patterns that are harmful to minors, such as a materialistic and objectivistic approach to interpersonal relationships, or the use of inappropriate diets, eating disorders, etc.

Jurisprudence in cases concerning the protection of minors

Judgment of the Court of Appeal in Warsaw – broadcast of a programme containing pornographic content.⁶⁶

In his decision, the Chairman of the National Broadcasting Council stated that the broadcaster had violated Article 18(4) of the Act by broadcasting programmes that threatened the physical, mental or moral development of minors, in particular those containing pornographic content and scenes. The Chairman of the National Broadcasting Council (KRRiT) decided that the frequency of scenes containing the presentation of sexual intercourse and other manifestations of human sexual life, their length, as well as the way they were filmed, meant that the topic of sex became dominant in the programme, and that the programme was produced solely to present these scenes. The area of the described scenes was disproportionately expanded in relation to the other plots. The leitmotif of the programme was to show sexual scenes, and the other content only connected the individual scenes.

The Court of Appeal in Warsaw ruled that the fact that the human genitals were not clearly shown during sexual intercourse did not exclude the programme from being considered pornographic. The court pointed out that the frequency of scenes depicting sexual intercourse, the duration and the realism of these scenes in isolation from any interpersonal relationships, without the intellectual and personal layer, clearly indicates that the aim of the production was to arouse sexual excitement, and not to convey erotic content aimed at showing the beauty of the human body or emphasising the emotional relationship between partners.

The court pointed out that the broadcasting of pornographic content, which is prohibited regardless of the intensity of the broadcast and the group of its recipients, can lead to socially

⁶⁵ Violation of, among others, the provisions contained in Article 16b(1)(2) in connection with Article 47k of the Broadcasting and Article 131 para. 1 of the Act on Upbringing in Sobriety and Counteracting Alcoholism, as well as art. 47e para. 1 in connection with art. 18 para. 4 of the Broadcasting Act.

⁶⁶ Judgement of the Court of Appeal in Warsaw of 10 June 2024 (file ref. no. VII AGa 1420/23).

irreversible consequences in the form of the dissemination of incorrect sexual behaviour patterns, especially among underage viewers. The Court found that the broadcaster's argument that it is primarily the responsibility of parents to ensure that children are protected from pornographic content was completely misplaced. It clearly stated that since the dissemination of programmes or other transmissions which are harmful to the physical, psychological or moral development of minors, in particular those containing pornographic content, is prohibited and since the prohibition applies to broadcasters, the parents of minors cannot be held responsible for the possible consequences of this violation, since they have legitimate reasons to expect that minors will never come into contact with such content on television.

9.5. Moderation of content on video sharing platforms (VSP)

In 2024, video-sharing platforms were audited to determine whether their providers moderate content that endangers minors. In the case of one provider, two programmes posted by users were found to contain content that endangers the proper physical, mental or moral development of minors and were not classified in accordance with the regulations issued under Article 47p(3) of the Act.

The Chairman of the National Broadcasting Council, in accordance with Article 53e(1) of the Act, called on the supplier to cease the violations within 14 days of the date of delivery of the summons, under pain of a financial penalty. The supplier complied with the summons without delay.

10. Commercial communications

10.1. Monitoring of commercial communications

In 2024, both scheduled and interventional monitoring of commercial communications broadcast and made available by broadcasters and VoD providers was carried out, including content offered by Polish YouTubers. One hundred and eighty six (186) TV programmes were monitored, as well as 9 local cable TV programmes, 300 radio programmes and 53 VoD services (635 programmes).

Information regarding decisions to penalise media service providers for violating regulations governing the broadcasting of commercial communications is presented in [Chapter 8](#) and in [Attachment 1](#).

10.2. Broadcasting of advertisements for so-called junk food during children's programmes ⁶⁷

In 2023, the Children's Ombudsman filed a complaint with the National Broadcasting Council (KRRiT) against the advertising of a popular brand of sweets advertised during children's programmes. Monitoring confirmed the presence of advertisements for such products during some children's programmes on Polsat, Polsat Film, Polsat Rodzina, Puls 2, Stopklatka, SuperPolsat, TV4, TV6, TVN Siedem, TVP1 (family film) and Zoom TV. The Chairman of the National Broadcasting Council (KRRiT) sent out notices to broadcasters to cease violating the provisions of Act. ⁶⁸ The results of the monitoring, together with information on the actions taken, were presented to the Ombudsman for Children.

10.3. Case law on commercial communications

Judgement of the Court of Appeal in Warsaw – broadcast of self-promotional messages incorrectly labelled as broadcaster announcements. ⁶⁹

In his decision, the Chairman of the National Broadcasting Council stated that the broadcaster had violated Article 16(3)(1) of the Act by airing self-promotional messages that were incorrectly labelled as broadcaster's announcements as provided for in Article 16(4)(1a) of the Act, as a result of which these messages were not included in the calculation of the total duration of advertising broadcasts provided for in Article 16(3)(1) of the Act and the total permissible duration of advertising broadcasts was exceeded. The Court of Appeal in Warsaw ruled that the broadcast material did not merely contain a simple, neutral transfer of information, but rather, due to the way in which its content was presented, constituted an incentive to watch certain programmes of the broadcaster, and was therefore self-promotion, not merely advertisements by the broadcaster.

The provisions of Article 16(4)(1) and Article 16(4)(1a) of the Act, which refer to announcements by the broadcaster, provide for the exclusion of the application of Article 16(3)(1) of the Act only in the case of announcements by the broadcaster containing only information about programmes. Any messages that go beyond information and contain an emotional element to persuade the audience to watch them are subject to the advertising time restrictions under Article 16(3)(1) of the Act. The time of the advertiser's announcements shall only be excluded from the advertising time to the extent that they directly relate to providing viewers with information about the advertiser's programmes or excerpts from these programmes.

⁶⁷ This is the broadcasting of advertisements for food or drinks containing ingredients that are not recommended in excessive amounts in a daily diet during children's programmes.

⁶⁸ Cf. Article 16b(3a) of the Broadcasting Act.

⁶⁹ Ruling of the Warsaw Court of Appeal of 11 October 2024 (file ref. no. VII AGa 498/24).

10.4. Cooperation with the Main Pharmaceutical Inspector

An example of ongoing inter-institutional cooperation is the cooperation with the Chief Pharmaceutical Inspector in the transmission of data on the broadcast of advertisements for individual medicinal products in television programmes, including the name of the television programme, date, time and duration of the broadcast.

The Chief Pharmaceutical Inspector, in accordance with the Pharmaceutical Law Act of 6 September 2011, supervises compliance with the provisions of the Act on the advertising of medicinal products.

10.5. Proposal to ban beer advertising before 10:00 p.m.

In response to the speeches made by the Chairman of the Senate Committee on Petitions in connection with the petition concerning the amendment of the Act on Education in Sobriety and Combating Alcoholism by introducing a ban on beer advertising before 10:00 p.m, and to the Ministry of Culture and National Heritage on changing the rules for broadcasting beer advertising, the Chairman of the National Broadcasting Council stressed that the national rules are more restrictive than those adopted by the EU legislator in the Audiovisual Media Services Directive.

EU legislation on commercial communications promoting alcoholic beverages does not provide for any hourly restrictions on the broadcasting of such advertisements, apart from a ban on targeting such advertisements at minors. In the opinion of the Chairman of the National Broadcasting Council, further restrictions on beer advertising on television would adversely affect the competitiveness of the Polish television market compared to such markets under the jurisdiction of other EU member states. The ban proposed in the petition would only apply to broadcasters under Polish jurisdiction, thus placing foreign broadcasters of Polish-language programmes in a privileged position.

As a result, the Polish television broadcasting market could become unbalanced. This imbalance and distortion of competition could prompt Polish broadcasters to move their headquarters and editorial teams to another EU member state. This would result in a real decrease in state revenues, lower domestic investment in television and film production, lower fees paid to the Polish Film Institute, and a negative impact on the labour market in the audiovisual sector.

11. Media education in the activities of the National Broadcasting Council

The National Broadcasting Council is statutorily involved in processes related to the promotion of media education.⁷⁰

11.1. Media education in public service broadcasters' programmes

In 2024, public radio and television broadcast a total of 1,614 hours of content thematically devoted to media education in educational, informational and journalistic programmes. These included artificial intelligence in journalism, verifying information, the ability to check questionable content, and resistance to methods of manipulating public opinion. In the context of the European Parliament elections, a large part of the programmes focused on the role of social media and threats such as manipulation and disinformation, as well as issues related to verifying false information online. Much attention was also paid to the protection of children in the digital space, including topics such as *sharenting* (the publication of photographs of children online), data processing, media ethics, information and communication specialisations among women, and news from the world of modern technology. There was also education on phishing, deepfake services⁷¹ and the Artificial Intelligence Act. The audience was informed about interesting phone apps, the work of podcasters and YouTubers, and technologies supporting education. The need to acquire and develop digital competences was also discussed, and the benefits of digitisation were presented. An attempt was made to find an answer to the problem of using AI (ChatGPT) at school. An important element was also the message addressed to seniors, which simply discussed how to use web resources, in particular platforms, services and applications of state institutions, including IKP, ePUAP, mObywatel.

Most of the programme offer in this subject area is published in the form of podcasts and videocasts on the broadcasters' websites. The TVP.PL portal publishes content related to online security, protection against media manipulation, encouraging the development of critical thinking skills and discussing the problem of disinformation. TVP, together with the Ministry of Digitisation, carried out a project entitled '*Uważaj! Dezinformacja*' ('Be careful! Disinformation').⁷² The TVP VoD service offers a programme that teaches about the intricacies of the Internet in a broad sense.

The public media also carry out non-broadcast activities related to media education (scientific seminars, debates, workshops, training courses). An important place is the Media Education

⁷⁰ Cf. Art. 6 (2) (14) of the Act - conducting research and evaluating the implementation of media literacy, including the evaluation of the activities of media service providers and video sharing platform providers.

⁷¹ Phishing is a type of cyber attack in which a cybercriminal tries to extort confidential information from the victim, while deepfake is a technique that uses artificial intelligence to create fake videos that imitate authentic recordings.

⁷² See: <https://www.tvp.pl/83782904/program-uwazaj-dezinformacja>

Centre (CEM), established at Polish Radio Kielce,⁷³ as well as the Training Centre of Radio Wrocław and Radio RAM.⁷⁴

11.2. Media education among the responsibilities of video sharing platforms (VSP)

The National Broadcasting Council (KRRiT) asked Polish providers of video-sharing platforms to provide information on their compliance with the Broadcasting Act, including the promotion of media literacy among their viewers.⁷⁵

In most cases, this obligation was fulfilled in the form of information on the rights and obligations of platform users and the rights and obligations of video platform providers, which are included in the terms and conditions. This information can also be found in the sections devoted to good practices and in the answers to FAQs.

In order to encourage VSP providers to become more involved in the promotion of media literacy, the National Broadcasting Council organised a meeting during which the representatives of the platforms agreed to cooperate in an information campaign on the rights and obligations of platforms and users in online communication.

11.3. Research by the National Media Institute (KIM) in connection with media literacy⁷⁶

The National Media Institute (KIM) conducted an important study entitled *‘Pokolenie Alfa – diagnoza potrzeb i wartości’* (‘Generation Alpha – diagnosis of needs and values’). The aim of the study was to understand the values of this generation, their needs, motivations, authorities and attitude towards the media. The results of the study showed that in the group of 4-5 year olds,

⁷³ The main objective of CEM is to provide practical knowledge about the mechanisms of media messages, how they are disseminated, how to critically analyse media messages, how to distinguish reliable information from fake news, and to promote good practices related to conscious and safe use of the media. In 2024, 6,320 people visited the CEM. The following workshops were organised for visitors: *‘Jak nie dać się fake newsom?’*, *‘Od opinii do informacji’*, *‘Poznajemy gatunki medialne’*, *‘Różne oblicza hejtu. Jak z nim walczyć i budować kulturę szacunku?’*, *‘Radiowa Akademia Dziecięca’*. (‘How not to fall for fake news?’, ‘From opinion to information’, ‘Getting to know media genres’, ‘The different faces of hate. How to fight it and build a culture of respect?’, ‘Children’s Radio Academy’).

⁷⁴ It is a place where knowledge and skills related to the work of a radio journalist are passed on. Participants can practice their voice, diction and how to present themselves in front of the camera. They learn how to prepare, obtain, edit and read information, and they learn to interpret literary texts. Workshops are also held on online safety and online news editing. Participants learn about the history of radio, visit the museum and have the opportunity to listen to archive recordings of the radio station. The classes are conducted by professional journalists from Radio Wrocław in professional recording studios. The courses are prepared for kindergartens, primary and secondary schools and are based on the curriculum of the Ministry of Education.

⁷⁵ See Article 47w of the Broadcasting Act.

⁷⁶ See Chapter 5.

although communication tools (telephone, tablets, computer, TV) are an important part of their lives, they do not dominate as a form of entertainment. The telephone, which usually belongs to the parents, is used at home and mainly for watching cartoons. In the 6-8 age group, the use and viewing of content on media devices is, as in the younger group, controlled by parents. In this group, however, the survey revealed that the children were only vaguely aware of the dangers of using media devices, that no one had talked to them about it, and that some of the children only knew the basic safety rules, e.g. not to talk to strangers or to give out their details. Some of the children already had a social media account, but they mainly used it to keep in touch with their family. The 9-11 age group is characterised by the fact that they already had their own media devices and most of them can use them without restrictions. Only in some cases did parents keep an eye on the screen time. The children were aware of the dangers of the internet, e.g. they did not publish private content or photos and responded appropriately to taunts on the web. Some of them limited their access to apps and games on their phones. The 12-14 age group uses mobile phones to play games, watch videos, communicate via Messenger and WhatsApp, and browse the Internet. Children already have accounts on social media platforms (mainly Instagram and TikTok, YouTube), where they post content. Devices are also used for learning, participating in online classes and solving educational tasks. In the children's opinion, parents only control the time they spend using apps on their phones, but they do not observe or follow what they do on the Internet, e.g. what content they publish or who they socialise with online. Parents who say they look through their child's phone without their knowledge, mainly when they notice a change in their child's behaviour, have a different opinion on the subject. The survey also indicated situations in which parents and children jointly impose certain restrictions on the use of technology. This group of children is well aware of the dangers of the internet. They know that they should not publish photos or private content and that they should respond appropriately to strangers' advances. They mainly learn about the dangers in school, although parents also sometimes talk to them about it. Some children know how to protect their privacy (e.g. by not using their real name, using VPN programmes, not publishing any information that could lead others to their real identity).

Children of the 'Alpha' generation are aware of the dangers of the Internet, but teachers feel that knowledge about hate speech, online fraud and technology addiction is insufficient. Parents and schools certainly support media awareness. Many parents install special apps to control the content that can be viewed. They also attend meetings where they are informed about technological threats and how to avoid them.

The study entitled '*Zjawisko dezinformacji*' ('The Phenomenon of Disinformation') was also important. The conclusions of the study indicated that although the level of knowledge of the concept of media education in the Polish society is low, there is an intuitive understanding of the need for such education. People perceive media education as preventive and educational activities addressed to various social groups aimed at raising awareness and protecting against threats in the media; learning to critically analyse media content – recognising disinformation, using social media consciously; learning to stay safe online, recognising manipulation and developing analytical skills in content reception. It is also widely believed that the media affect everyone, which is why media education should cover the whole of society. At the same time, two groups of recipients are identified as particularly important. Firstly, children and young people, who should be included in media education from an early age so that they understand how the media works and can avoid negative behaviour patterns, e.g. related to social media. Equally

important is the education of parents, so that they can consciously support their children in their use of the media. The second group is senior citizens, as they are particularly susceptible to manipulation and disinformation due to difficulties in navigating the modern media world and excessive credulity.

Demographic variables influence the perception of media education. Older people are more likely to see media education as a need for others, especially for children, young people and senior citizens. Younger people see media education as something that can also be useful for themselves. Women place more emphasis on the education of children and young people and the role of parents in this process. Men, on the other hand, are more likely to emphasise critical thinking and information analysis as key elements. People from large cities are more aware of media education than those from smaller towns.

For younger groups, it is important that media education knowledge is communicated in a dynamic way. Digital forms of education are preferred. Older generations and residents of smaller towns value traditional methods, such as meetings and information campaigns. Working people aged 25-45 value education provided by experts, such as journalists, psychologists and sociologists, in the form of workshops, training offered at work or podcasts.

11.4. Education for and through the media – studies and publications on the KRRiT website

Compendium of media standards⁷⁷

The National Broadcasting Council has developed and published a description of the basic aspects of journalistic ethics and professional standards that should form the basis of every journalist's work. The main elements that should guide a journalist's work are the search for truth, professionalism and reliability, and the ability to separate information from emotion. Fact-checking, analysis and comparison of different sources are also important.

Due to the fact that journalism is a profession of public trust, media professionals should be guided by the common good in their work and should remain neutral in social or political disputes. The National Broadcasting Council emphasised that the form of communication requires precision, as it is necessary to separate information from opinion and to clearly label content such as columns or sponsored material. As opinion leaders, journalists must be aware of their responsibility for the content they publish and the impact that content has on society. In this context, responsibility for respecting the principles of freedom of expression and the protection of personal rights is also of particular importance. The dissemination of false information (fake news) is absolutely unacceptable. In addition, the KRRiT drew attention to the organisation of the media market, which should take into account its impact on political and economic life, as the media play an important role in shaping public awareness.

⁷⁷ See: <https://www.gov.pl/web/krrit/kompendium-standardow-w-mediach>

Publication: ‘The iGen (Internet Generation), influencers and social media overdose – a case study’⁷⁸

KRRiT member Dr Hanna Karp, Professor at the AKSiM, raised the issue of global brands and the advertising market exploiting young generations' fascination with modern communication technologies. This group has been most dominated by digital tools. This raises the question of the price young users pay by losing their agency to global players. The study presents conclusions, including warnings against the uncontrolled use of social media such as TikTok, and guidelines for counteracting addiction to these platforms.⁷⁹

11.5. Dr Paweł Stępka Award of the National Broadcasting Council (KRRiT)

The jury of the Dr Paweł Stępka Award, chaired by Dr Hanna Karp, Professor at the (AKSiM) Academy of Social Culture and the Media, has once again awarded the Dr Paweł Stępka Award for the best scientific work and publication in the field of electronic media.

This edition of the Award was of a very high standard and the Dr Paweł Stępka Award Committee decided to award honourable mentions to:

- Dr Tomasz Podlewski for his doctoral thesis entitled ‘The role of the press spokesperson of the Polish Episcopal Conference from the perspective of social communication theory and practice and the mission of the Church’, defended at the Pontifical University of John Paul II in Kraków;
- Dr Aleksandra Chmielewska and editor Jacek Snopkiewicz for their collective work entitled ‘New Supermedium. Contemporary faces of television and scenarios for the future’, published by ELIPSA Dom Wydawniczy i Handlowy and the Publishing House of the Leon Schiller National Higher School of Film, Television and Theatre in Łódź.

In 2024, the National Broadcasting Council also financed the publication of the winner of the 2023 Dr Paweł Stępka Award, Dr Diana Rutkowska, author of the work entitled ‘The BBC in the digital age. The Evolution of Public Broadcasting in the Age of New Technologies,’ published by ELIPSA Dom Wydawniczy i Handlowy.

11.6. Special awards funded by the National Broadcasting Council

The Chairman of the National Broadcasting Council funded a special award for the creator of the best Polish documentary film presented at the 16th NNW International Film Festival *‘Niepokorni, Niezłomni, Wyklęci’* (‘The Unbroken, the Unconquered, the Cursed’) in Gdynia. The winner of the ‘Golden Resistor’ in the Polish documentary film category was **Piotr Mielech**,

⁷⁸ Srr: <https://www.gov.pl/web/krrit/cyfrowe-technologie-zawladnely-swiadomoscia-mlodych-pokolen-co-wykorzystuja-globalne-marki-i-rynek-reklamy-mlodzi-uzytkownicy-mediow-spolesznosciowych-niezauwazalnie-traca-wlasna-podmiotowosc-a-po-wykorzystaniu-sa-odrzuconi--publikacja-czlonka-krrit-dr-hab-hanny-karp>

⁷⁹ Cf. Chapter 4

creator of the film entitled: ***‘Moja sytuacja jest szczególnie trudna’*** (**‘My situation is particularly difficult’**). The documentary tells the story of the martyrdom of Father Jerzy Popiełuszko and the role of lawyer Jan Olszewski as an auxiliary prosecutor in the trial of Father Jerzy's murderers.

Members of the National Broadcasting Council funded a special award for the creator of the best documentary film presented in the category: International Documentary Film. The award was received by the director of the film **‘Mensch’, Paweł Wysoczański**. The documentary has been presented several times in the USA and Canada at film festivals, universities and screenings for the Polish diaspora. It is dedicated to Ludwik Hirszfeld (1884-1954), an outstanding physician, founder of the Polish school of immunology and a new field of science - seroanthropology. Ludwik Hirszfeld was a scientist who had to pursue his passion in an extremely oppressive reality.

The International Film Festival ‘The Unbroken, the Unconquered, the Cursed’ in Gdynia, organised by the Scena Kultury Association and the City of Gdynia, is the most important event of its kind not only in Poland but also in Europe.

For the eleventh time, the Chairman of the National Broadcasting Council funded the **Crystal Screen** award for local cable television broadcasters whose programmes address issues important to local communities and promote a given region. The event was held as part of the **To nas dotyczy** (It Concerns Us) competition organised for local television by the Polish Chamber of Electronic Communication. The competition is the only event of its kind for licensed local broadcasters.

The National Broadcasting Council awards prizes in the category: *Moja Mała Ojczyzna -jestem stąd* (*‘My Little Homeland – I am from here’*). The spokesperson for the National Broadcasting Council participates in the jury's work. The jury evaluates the submitted competition entries in terms of, among other things, the choice of topic, the value of the message in a given category, and the manner of execution.

The winners of the competition: ‘My Little Homeland – I am from here’ are:

- **Twoja Telewizja Morska from Wejherowo** for the film entitled **Skarby Kaszub-Nadole** (Treasures of Kaszubia-Nadole), produced by **Eugeniusz Pryczkowski and Daniel Zaputowicz**;
- **Telewizja Asta from Piła** for the film entitled **Wielkopolska Travel**, produced by **Tomasz Janczar and Paulina Michątek-Komorowska**;
- **Telewizja Toruń** for the film entitled **Śladem Mikołaja Kopernika** (In the Footsteps of Nicolaus Copernicus), produced by **Marta Nowicka-Bujak**

11.7. Honorary patronage of the Chairman of the National Broadcasting Council

The Chairman of the National Broadcasting Council granted honorary patronage to events such as conferences, competitions, seminars and other ceremonies organised by universities, business associations, publishing houses and foundations. The patronage of the Chairman of the

National Broadcasting Council is granted in connection with the activities of these entities in the field of audiovisual and telecommunications services.

The following entities have been granted the honorary patronage of the Chairman of the National Broadcasting Council as organisers of the following events:

- *Olimpiada Wiedzy o Mediach* (Media Knowledge Olympics) - Faculty of Journalism, Information and Bibliology, Department of Social Communication and Public Relations, University of Warsaw;
- *Jesienna Konferencja Szkoleniowa Związku Telewizji Kablowych w Polsce* (Autumn Training Conference of the Cable Television Association in Poland) - Chamber of Commerce of the Cable Television Association in Poland;
- *XXXI Konferencja Operatorów Telekomunikacyjnych iNET* (31st Conference of Telecommunications Operators iNET) - Media Forum Meeting 2024 in Zakopane - Media Forum Foundation;
- Spring Conference of KIKE in Jachranka - National Chamber of Ethernet Communication;
- Autumn KIKE Conference in Warsaw - National Chamber of Ethernet Communication;
- National Spring Conference of Electronic Communications Operators PIKE - Polish Chamber of Electronic Communication;
- Local Television Forum and competition: *This concerns us. My Little Homeland* - PIKSEL Foundation;
- *51. Międzynarodowa Konferencja i Wystawa PIKE w Toruniu* (51st PIKE International Conference and Exhibition in Toruń) - Polish Chamber of Electronic Communication;
- *Jubileusz 35-lecia magazynu TV-SAT oraz 19. Wigilia Kablowa w Siennej k/Stronia Śląskiego* (35th anniversary of TV-SAT magazine and 19th Cable Christmas Eve in Sienna near Stronie Śląskie) - Łódź Sat Sp. z o.o., Protelko Foundation, iNET Group.

12. Fulfillment of the mission by the public media

12.1. Assessment of the fulfillment of the public mission in 2023 based on annual reports submitted by broadcasters to the National Broadcasting Council by the end of April 2024.

As every year, the National Broadcasting Council (KRRiT) analysed the reports of public radio and television broadcasters on the implementation of their public service mission in 2023. The reports contained information on the manner of implementation of the mission tasks specified in Article 21(1), (1a) and (2) of the Broadcasting Act and set out in the Charter of Obligations for 2020-2024, as well as information on the amount and manner of use of public funds and the total net cost of performing the public mission. On 26 June 2024, the National Council adopted resolutions on this matter, deciding to accept the reports of all companies. At the same time, the National Broadcasting Council recommended that the companies implement the provisions of the Charter of Obligations for 2020-2024 and the previously approved programme and financial plan for this year in their programmes broadcast in 2024.

The National Broadcasting Council recommended that the companies not reduce the planned 2024 scope of the following programme elements:

- the number of hours of programmes fulfilling the statutory tasks and obligations specified in Article 21 of the Act;
- the percentage share and time allocation for individual genre categories specified in Article 21(1) of the Act in the annual broadcasting time;
- the percentage share and time allocation for topics related to the region and the planned number of hours of programmes for national and ethnic minorities and communities using regional languages (applies to programmes with regional coverage);
- in radio programmes: the percentage share and duration of spoken programmes and the percentage share of works referred to in Article 15(2), i.e. musical works performed in Polish;
- in split local channels created by regional broadcasters: the planned number of hours of annual broadcasting time for a given programme;
- in television programmes: the percentage of programmes referred to in Article 15(1) and (3) and Article 15a(1) and (2), as well as programmes referred to in Article 18a(1) of the Broadcasting Act, 1 and 2, as well as programmes referred to in Article 18a(1) of the Broadcasting Act.

The National Broadcasting Council accepted the reports of public radio and television broadcasters on the fulfilment of their public mission for 2023 for a total amount of PLN 4,543,032,000. These costs were covered by subscription fees and compensation granted in 2023, as well as surpluses from previous years and own funds and subsidies from the state budget.

The costs of the mission presented by public broadcasters in their annual reports for 2023, in accordance with Article 31b of the Broadcasting Act, are presented in **Attachment No. 2.**

12.2. Assessment of the implementation of tasks resulting from the approved programme and financial plans for 2024

The National Broadcasting Council (KRRiT) conducted an audit of the implementation by public media companies of the programming plans approved for 2024.⁸⁰ In assessing the implementation of the plans, the KRRiT also took into account the fact that the full implementation of the plans was affected by the unlawful liquidation of public media companies.

The audit was conducted in a similar manner to previous years, i.e. in addition to checking whether the companies broadcast the programmes approved for distribution, the implementation of the following elements of the programme was compared with the plan:

⁸⁰ All programmes broadcast in 2024 were reviewed in this way, i.e. a total of 94 programmes, of which 38 were broadcast by TVP SA, 10 by PRSA and 46 by regional broadcasters (including 17 universal regional programmes, 7 specialised programmes, 5 municipal programmes, 15 split local channels and 2 programmes broadcast periodically, known as occasional programmes).

- the percentage share and time allocation of individual categories of programmes specified in Article 21(1) of the Act;
- the number of hours of programmes fulfilling the tasks and obligations of the public broadcaster specified in Article 21(1a) and (2) of the Act;
- the percentage share and duration of spoken programmes (radio programmes);
- the percentage share and duration of programmes on topics concerning local communities;
- the number of hours of broadcasting of split local channels;
- the number of hours of programmes for national and ethnic minorities and communities using a regional language.

The analysis of public media companies' reports on the implementation of programme plans approved by the National Broadcasting Council for 2024 was carried out in accordance with the long-established control methodology, according to which deviations from the plan in the elements of the programme under review may reach up to 20%. The KRRiT considers a reduction in the number of hours of each of the audited programme elements by more than 20% compared to the amount specified in the plan to be a failure to implement the plan.

In the reporting year, as in previous years, none of the public media companies implemented 100% of the plan approved by the National Broadcasting Council. Deviations from the approved programme plan were found in all audited indicators, i.e.:

- the share of statutory programme categories;
- the share of spoken programmes in radio programmes;
- the share of regional/urban/local topics in radio and television programmes;
- the share of programmes fulfilling the tasks and duties of a public broadcaster, in accordance with Article 21(1a) and (2) of the Broadcasting Act.

The reports showed that the plans for the above-mentioned programme elements were implemented by at least 80% by 15 regional radio companies.⁸¹ In the programmes of the four remaining companies, i.e. TVP SA, *Polskie Radio SA* and two regional broadcasters (Radio Łódź SA and Radio Koszalin SA), some of the programme elements examined were implemented at a level below 80%.

The analysis of the reports was also conducted in terms of the implementation of the provisions contained in the action plans for 2024. Out of 19 companies, five companies' programmes showed deviations from the provisions of the action plans for 2024. The non-compliance concerned three regional broadcasters (Radio Gdańsk SA, Radio Łódź SA, Radio Kielce SA), *Telewizja Polska SA* and *Polskie Radio SA*. The deviations from the provisions of the charter concerned the failure to meet the minimum shares of certain statutory categories of programmes. In the case of Radio Łódź SA, the local programme for Piotrków Trybunalski planned for 2024 was not launched, and *Telewizja Polska SA* did not broadcast the TVP 4K programme.

⁸¹ Radio Białystok SA, Radio Pomorza i Kujaw SA, Radio Gdańsk SA, Radio Katowice SA, Radio Kielce SA, Radio Kraków SA, Radio Lublin SA, Radio Olsztyn SA, Radio Opole SA, Radio Poznań SA, Radio Rzeszów SA, Radio Szczecin SA, Radio Wrocław SA, Radio dla Ciebie SA, Radio Zachód SA.

The implementation of the provisions of the KRRiT Regulation on the free dissemination of election broadcasts in connection with the elections to the European Parliament and local government was also audited.⁸² Of all 19 public radio and television companies, six regional broadcasters failed to meet the requirements set out in the Regulation in the elections to the European Parliament, and five regional broadcasters and TVP SA in the elections to local government. TVP SA and PR SA, while in the local government elections, five regional broadcasters and TVP SA failed to comply.

As in previous years, in 2024, the National Broadcasting Council allocated funds to public radio and television broadcasters to cover 100% of the costs of producing and broadcasting programmes for national and ethnic minorities and communities using regional languages.

Public broadcasters' programmes included programmes addressed to various minorities. Regional broadcasters aired programmes in minority languages for the Belarusian, Ukrainian, Lithuanian, German, Roma, Lemko, Armenian and Slovak communities, as well as for the Kashubian community, which uses a regional language. TVP SA regional programmes included programmes for the Belarusian, Ukrainian, Lithuanian, German, Armenian and Tatar minorities, as well as for the Kashubian community using the regional language.

Programmes for minorities were produced by 11 regional radio companies⁸³, and only one failed to meet its target, albeit to a small extent. *Telewizja Polska* planned programmes for these groups in five regional TVP channels (TVP3 Białystok, TVP3 Gdańsk, TVP3 Katowice, TVP3 Olsztyn and TVP3 Opole) and in a nationwide slot called TVP3 Regionalna.⁸⁴ TVP broadcast programmes for minorities on six regional channels (TVP3 Białystok, TVP3 Gdańsk, TVP3 Katowice, TVP3 Olsztyn, TVP3 Opole, TVP3 Szczecin) and on the joint TVP3 Regionalna channel.

The results of this inspection will be taken into account by the National Broadcasting Council when allocating subscription fee revenues for 2026.

12.3. Programme and financial plans for 2025

In 2024, the National Broadcasting Council (KRRiT) once again conducted the process of agreeing and approving the programme and financial plans of public radio and television companies for the next calendar year. The analysis covered draft plans for a total of 86 radio and

⁸² Cf. the Regulation of the National Broadcasting Council of 12 July 2011 on the time and framework for the free distribution of election broadcasts, the procedure for the allocation of time, the scope of registration and the manner of preparation and broadcasting of election broadcasts in public radio and television programmes, with regard to the broadcasting of election programmes in elections to the European Parliament in the Republic of Poland and in elections to local councils, county councils and provincial councils, as well as in elections to heads of communes, mayors and town presidents.

⁸³ Only Radio Wrocław allocated slightly less time to this offer, i.e. ½ hour less than planned.

⁸⁴ Of the five regional branches of TVP SA that planned programmes for national and ethnic minorities and for the Kashubian-speaking community, only one regional branch of TVP SA fully implemented its plan, namely TVP3 Opole. In the other programmes of TVP regional branches and on TVP3 Regionalna, the deviations from the plan ranged from 1 minute to nearly 14 hours.

television programmes, i.e. TVP SA – 32 programmes, *Polskie Radio SA* – 10, regional stations of *Polskie Radio* – 44.

Compared to 2024, three of the 19 public media companies planned significant changes, i.e. a smaller number of programmes to be broadcast:

- in 2025, TVP intended to discontinue broadcasting eight specialised programmes (Alfa TVP, TVP ABC2, TVP Kultura2, TVP Historia, TVP Historia2, TVP Dokument, TVP Nauka, TVP Kobieta). The plans indicated that TVP Historia, TVP Nauka and TVP Dokument were to be merged into a single new programme called TVP Wiedza.
- Two regional radio companies, Radio Białystok SA and Radio Łódź SA, planned to discontinue the production and broadcasting of two local programmes distributed as part of the so-called splits: Radio Białystok from the radio band addressed to the community of Suwałki and the Suwałki region, and Radio Łódź to the residents of Piotrków Trybunalski.

The draft plans of all companies indicated the statutory tasks and obligations listed in Article 21(1,1a) and (2) of the Act and included in the Charter of Obligations for 2025-2029, as well as those resulting from KRRiT regulations (presentation of the organisation's activities for the benefit of the public organisations or the positions of political parties, trade unions and employers on key public issues). An important element of the draft plans of companies broadcasting nationwide programmes (*Telewizja Polska SA* and *Polskie Radio SA*) were election broadcasts concerning the campaign for the office of President of the Republic of Poland, planned in accordance with the Electoral Code and KRRiT regulations.

The draft plans for 2025, submitted within the statutory deadline, i.e. by 31 May 2024, could not be approved because the National Council did not authorise the Chairman of the National Broadcasting Council to conclude an agreement with the companies on the establishment of a Charter of Obligations for the years 2025-2029. In this situation, pursuant to Article 21d of the Act, the Charter of Obligations established for the previous period, i.e. for 2020-2024, remain in force. The Chairman of the National Broadcasting Council called on the companies to adjust their programming and financial plans for 2025 to the Charters of Obligations established for the years 2020-2024. This means that the companies should adjust their plans for 2025 to these Charters in terms of the number of programmes broadcast, planned for the implementation of statutory tasks and obligations. Companies that had planned to reduce the number of programmes broadcast had to restore those programmes that were broadcast in 2024. Not all companies complied with the KRRiT Chairman's request. In the case of 10 companies (*Polskie Radio SA*, Radio Białystok SA, Radio Gdańsk SA, Radio Kielce SA, Radio Koszalin SA, Radio Kraków SA, Radio Łódź SA, Radio Olsztyn SA, Radio Poznań SA and Radio Zachód SA), non-compliance with the Charters of Obligations for 2020-2024 in terms of programming activities in 2024 was found. The deviations from the provisions of the Charters of Obligations concerned both programming and financial issues. Consequently, in its resolutions of 11 December 2024, the National Council refused to approve their programming and financial plans for 2025. With regard to the remaining nine companies (*Telewizja Polska SA*, Radio PiK SA, Radio Katowice SA, Radio Lublin SA, Radio Opole SA, Radio Rzeszów SA, Radio Szczecin SA, Radio dla Ciebie SA and Radio Wrocław SA), the National Council approved the plans for 2025 because they were in line with the provisions of the 2020-2024 Charters of Obligations. The companies whose programme and financial plans for 2025 were not approved were requested by the Chairman of the Council to submit revised

programme and financial plans for 2025 by 31 December 2024. The further process of agreeing the plans of the 10 public media companies will take place in 2025.

12.4. Charters of Obligations for 2025–2029

In 2024, the National Broadcasting Council (KRRiT) began the process of agreeing on Charters of Obligations for the next five-year period, i.e. for 2025-2029, in accordance with the guidelines contained in the Act and the Council Regulation of 15 November 2018 on the detailed procedure for agreeing on a Charter of Obligations. Public media companies submitted their draft Charters to the National Broadcasting Council within the statutory deadline, i.e. by 30 April 2024. In accordance with the requirements of the Act, the draft Charters were subject to public consultation by being published on the National Broadcasting Council's website.

The National Broadcasting Council prepared information on the results of the consultation, which was made available on its website.⁸⁵ The draft Charters were analysed for their compliance with the principles of fulfilling the public mission set out in Article 21 of the Act. The National Broadcasting Council submitted comments on the draft Charters and called on public radio and television broadcasters to provide further explanations. Within the statutory deadline, by 15 November 2024, the National Broadcasting Council assessed the compliance of the draft Charters for 2025-2029, as amended by the companies, with the principles of fulfilling the public mission. In terms of programming, the draft Charters were assessed positively and found to guarantee the fulfilment of the tasks arising from the public mission. Ultimately, however, with regard to all companies, the KRRiT adopted resolutions refusing to authorise the Chairman of the KRRiT to conclude agreements on the establishment of Charters of Obligations for the years 2025-2029. The main reason for rejecting the draft Charters was the companies' indication that, for the next five years, the costs of financing the public mission at such a level could not be financed from public funds, and due to the ongoing process of liquidation of the public media companies. In connection with the rejection of the draft Charters of Obligations for 2025-2029, the National Council, referring to Article 21d of the Act, informed the companies that until an agreement is reached, the previous Charters, i.e. those established for 2020-2024, will remain in force.

12.5. Financing of the public service mission in 2024

The National Broadcasting Council allocated a total of PLN 642.3 million to public broadcasters for the performance of their public service tasks in 2024, including PLN 620 million in subscription fee revenue planned for 2024⁸⁶ and PLN 22.3 million in surplus subscription fee revenue from 2022. As a result of the liquidation of public media companies⁸⁷, funds from the

⁸⁵ See: <https://www.gov.pl/web/krrit/krrit-prezentuje-wyniki-publicznych-konsultacji-projektow-kart-powinnosci-na-lata-2025-2029-zlozonych-przez-19-spolek-mediow-publicznych>

⁸⁶ Based on Resolution No. 194/2023 of 13 September 2023 on the distribution of subscription fee revenues in 2024 among public radio and television entities.

⁸⁷ On 27 December 2023, the Minister of Culture and National Heritage decided to put *Telewizja Polska SA* and *Polskie Radio SA* into liquidation, and on 29 December 2023, he decided to liquidate 17 regional radio companies.

distribution of subscription fee revenues were transferred to court deposits or directly to the companies' accounts.⁸⁸

The National Broadcasting Council (KRRiT) has allocated PLN 620 million in subscription fee revenue from 2024 as follows:

- PLN 316.2 million was allocated to *Telewizja Polska*, including funds for 16 regional branches;
- PLN 151.9 million was allocated to *Polskie Radio*;
- PLN 151.9 million was allocated to 17 regional radio companies.

A detailed breakdown of the allocation of subscription fee revenues by the National Broadcasting Council to public radio and television entities in 2024 is presented in **Attachment No. 3.**

In addition, in connection with the floods in Poland and the state of natural disaster in September 2024, the National Council transferred funds from the surplus generated in 2022 in the amount of PLN 22.3 million to public radio and television companies and determined the following distribution of these funds:⁸⁹

- *Telewizja Polska* PLN 11.3 million (51.0%);
- *Polskie Radio* PLN 5.5 million (24.5%);
- regional radio companies PLN 5.5 million (24.5%).

The detailed allocation of subscription fees from 2024 and the surplus from 2022 transferred to public radio and television in 2024 is presented in **Attachment No. 4.**

Telewizja Polska SA (Polish TV SA)

According to information provided by TVP, in 2024, subscription fee revenues covered 4.4% of the costs of *Telewizja Polska's* public service mission. The remaining 95.6% of the costs were financed from the surplus from 2023, budget subsidies and own funds. The costs of the public service mission in 2024 at TVP amounted to PLN 2,991,528,000, of which the creation of programmes:

- at the national level – PLN 1,442,551,000;
- specialised programmes – PLN 574,186,000;
- regional programmes – PLN 385,022,000;
- TVP 3 Regionalna (shared channel) – PLN 35,049,000;

⁸⁸ The funds were allocated on the basis of Resolution No. 194/2023 of 13 September 2023 on the distribution of subscription fee revenues in 2024 among public radio and television broadcasters, Resolution No. 40/2024 of 7 February 2024 on the use of subscription fee revenues for the performance of public service in 2024, Resolution No. 240/2024 of 17 September 2024 amending Resolution No. 40/2024 of 7 February 2024 on the use of subscription fee revenues for the performance of public service in 2024, Resolution No. 241/2024 of the National Broadcasting Council of 17 September 2024 and separate resolutions on each of the 17 regional radio companies.

⁸⁹ Pursuant to Resolution No. 241/2024 of 17 September 2024, the National Council decided to distribute the surplus revenue referred to in Article 8(1) of the Act on Subscription Fees among public radio and television broadcasters.

- TVP Polonia, TVP World, TVP Wilno and Bielsat TV – PLN 246,309,000.

PLN 159,389,000 was allocated for programme distribution, and PLN 149,022,000 was allocated for other tasks related to the public service mission, including the Digital Public Media Library (BCMP), multimedia services, broadcasting and technology, and for the Telegazeta, PLN 149,022,000.

Detailed information on the costs of fulfilling the public mission of Telewizja Polska in 2024 is presented in **Attachment No.5**

Polskie Radio SA

Information provided by *Polskie Radio* indicates that in 2024, subscription fees covered 9.5% of the costs of its public mission. The remaining costs of the mission were financed from the surplus from 2023, budget subsidies and own funds. The financing of 4% of the public mission costs, amounting to PLN 15,212,000 was not covered.

The costs of public service broadcasting in 2024 at Polish Radio amounted to PLN 376,212,000, of which for the creation of programmes:

- nationwide – PLN 220,177,000;
- specialised – PLN 40,746,000;
- Polish Radio for Foreigners – PLN 17,275,000.

PLN 67,855,000 was allocated for the analogue broadcasting of national programmes, Radio for Foreigners and Radio for Ukraine, and PLN 15,950,000 for the broadcasting of programmes in the DAB+ system, and PLN 14,209,000 was allocated for other tasks fulfilling the public mission, including the Radio Broadcasting Centre in Solec Kujawski.

Detailed information on how Polish Radio will use the funds from subscription fees in 2024 is presented in **Attachment No.6.**

Regional public radio stations

Regional radio companies reported that revenues from subscription fees received from the National Broadcasting Council and court deposits totalling PLN 63,926,000 covered 19.2% of the costs incurred in the performance of their public mission in 2024. The remaining costs of performing the mission were financed from the companies' own revenues, surpluses from 2023 and subsidies from the state budget. In total, the costs of performing the public mission of all regional radio companies in 2024 amounted to PLN 332,143,000. Twelve of the seventeen companies reported a shortfall in the coverage of mission implementation costs totalling PLN 24,818,000.

In addition to expenditure related to the creation and distribution of programmes, in analogue and digital form, regional radio companies used subscription fee funds to cover the costs of creating and distributing programmes for national and ethnic minorities and for creating and distributing local programmes, as well as specialised programmes and new media. Regional

radio companies also incurred an investment expenditure of PLN 5,576,000, which was financed from the subscription fee surplus, allocations to depreciation costs, own funds and subsidies. Subscription fees covered investment expenditures at Radio Gdańsk in the amount of PLN 85,000, Radio Koszalin in the amount of PLN 11,000 and Radio dla Ciebie in the amount of PLN 319,000.

Detailed information on the costs of performing the public service mission in regional radio companies in 2024 is presented in **Attachment No. 7**.

12.6. Forecast of revenues for 2025 and their distribution

On 30 September 2024, the National Council adopted a forecast of subscription and non-subscription revenues for 2025 in the amount of PLN 605,000,000 and determined the following distribution:

- *Telewizja Polska* PLN 308.4 million (51.0%);
- *Polskie Radio* PLN 148.3 million (24.5%);
- Regional radio companies PLN 148.3 million (24.5%).

13. Licensed television

13.1. Changes to digital terrestrial television multiplexes

In 2023, public television channels vacated slots on MUX-8 and MUX-1 in connection with their transfer to MUX-6, a multiplex entirely dedicated to programmes broadcast by *Telewizja Polska*. Three slots for new television channels were freed up on MUX-8, and one slot for a television programme was freed up on MUX-1. The slot on MUX 1 was allocated to the programme *Wydarzenia 24* ('Events 24') in 2023.

In 2024, the National Broadcasting Council issued three decisions granting new licences for terrestrial television programmes broadcast on MUX-8, including two decisions for specialised news and current affairs programmes, *WPolsce24* and *Republika*, and one decision for a specialised film and documentary programme, ViDocTV (originally named CTV9).

13.2. Terrestrial television licences for the next period

No later than 12 months before the expiry date of the licence, the programme broadcaster has the right to apply for a licence for the next 10-year period (a so-called 're-licensing').⁹⁰ When considering the application, the National Broadcasting Council assesses the broadcaster's activities to date, checking whether there are any circumstances specified in the Act as grounds

⁹⁰ See Article 35a of the Broadcasting Act.

for revoking the licence during its term and whether there are any grounds for refusing to grant a licence for the next period.⁹¹

Such circumstances include, inter alia, permanent cessation of programme broadcasting lasting for several consecutive months, gross violation of the Act or the terms of the licence, direct or indirect takeover of control over the broadcaster's activities by another person.⁹² The procedure for the so-called re-licencing is conducted with the participation of the existing broadcaster, without the possibility of other interested parties joining the procedure.

In 2024, the National Broadcasting Council issued a decision to extend the licence for TV Puls for another period. Applications for a licence for the next period in 2024 were submitted by the broadcaster of the local terrestrial programme TVC (a new licence was issued in January 2025) and two national terrestrial broadcasters, WP and NOWA TV (the licence expires in January 2026).

13.3. Transfer of licence rights for terrestrial television broadcasters

The transfer of rights under the licence is permitted in the event of the transformation of commercial companies or the establishment of a company by a natural person, with the consent of the National Broadcasting Council. The transfer of rights is also possible in the event of a merger or division of companies. The changes take effect after entries are made in the National Court Register. The most common purpose of such changes is to streamline the organisational structure within the same capital group or to change the current legal form of the business.

In 2024, the National Broadcasting Council (KRRiT) approved the transfer of rights under the licence in connection with the merger of Polo TV and Music TV⁹³ with TV Spektrum as the acquiring company.⁹⁴ The above ownership changes were made in companies operating within the Polsat Plus capital group. In addition, Stopklatka received consent for the transfer of licence rights to Kino Polska TV in connection with the planned merger of the companies.

13.4 Programme changes in terrestrial television broadcasters' licences

During the term of their licences, broadcasters submit applications to the National Broadcasting Council (KRRiT) for changes to their programming conditions. Most often, these concern changes to the name of a programme. Due to the competitive nature of the procedure by which licences are granted, programming changes in programmes broadcast on terrestrial frequencies should not significantly deviate from the concept originally presented by the broadcaster. These restrictions apply to a lesser extent to satellite and cable licences.

⁹¹ See Article 35a and 38 of the Broadcasting Act.

⁹² See Article 38 (1 and 2) of the Broadcasting Act.

⁹³ These are the broadcasters of POLO TV, VOX MUSIC TV and ESKA TV television programmes on the multiplex.

⁹⁴ As a result of the merger, all the assets of the acquired companies were to be transferred to TV Spektrum.

In 2024, the National Broadcasting Council made a programme change in one terrestrial broadcaster's licence. In the licence granted to Red Carpet TV, the name of the programme was changed to ViDocTV. On the other hand, Telewizja Puls was refused a change to its licence for the broadcasting of the programme PULS 2, consisting in the repeal of the time slot (6:00 a.m. to 11:00 p.m.) set for the fulfilment of the obligation to ensure a minimum percentage of planned types of programmes in the weekly broadcasting time.

13.5. Satellite television programmes

In 2024, 11 applications for new licences and 16 applications for the renewal of licences for the distribution of television programmes via satellite broadcasting were received.

The Chairman of the National Broadcasting Council issued seven new licences (five for specialised sports programmes broadcast by CANAL+ Polska and two for specialised music programmes) and nine licences for the next period.

In May 2024, a vote was held on the granting of a licence for the next period for the TVN Style programme, which remained undecided. Pursuant to Article 35(3) of the Broadcasting Act, foreign entities may not hold (even indirectly) more than 49% of the shares in a company holding a licence in Poland. With Poland's accession to the European Union, the Broadcasting Act was amended to increase the limit on non-EU shareholders in a company holding a licence to broadcast a programme to 49%, with no restrictions for shareholders from the European Economic Area. The owner of shares in TVN SA, which controls 100% of that company, is not an entity from the European Economic Area, as the United States is a country outside the EEA. The Chairman of the National Broadcasting Council recalled that the American investment in TVN SA took place without the consent of the National Broadcasting Council, as such a resolution on the American investment in TVN SA never took place.

Pursuant to Article 40a of the Broadcasting Act, the acquisition of shares by a foreign person in a company which holds a licence to broadcast programmes requires the authorisation of the Chairman of the National Broadcasting Council. The Chairman of the National Broadcasting Council issues and revokes the above authorisation on the basis of a resolution of the National Broadcasting Council.

KRRiT Chairman Maciej Świrski announced that he would consider a motion to bring Jan Dworak – Chairman of the KRRiT in 2010-2016 – before the State Tribunal for a serious violation of the Polish media law, by passively allowing the above transaction to occur.⁹⁵ For this reason, the company's capital structure was analysed by independent experts.

Finally, in June 2024, the licence for the next period was voted and passed, with one negative vote cast by the KRRiT Chairman. According to the KRRiT Chairman, granting the concession to TVN Style could involve a breach of Polish and European law.

⁹⁵ See: <https://www.gov.pl/web/krrit/komunikat-przewodniczacego-krrit-w-sprawie-glosowania-nad-koncesja-dla-tvn-style>

In November, the KRRiT also voted to grant concessions for the following programmes: TVN Fabuła and TVN International Extra for another 10 years. At the time of the vote, the KRRiT chairman announced that he had not supported the concessions due to the issue of the company's ownership structure, which has not been clarified to date.

In the case of five concessions, due to the aforementioned ownership changes in the Polsat Plus Group, decisions were issued to transfer the rights under these concessions to TV Spektrum as the acquiring company,⁹⁶ while Stopklatka was granted permission to transfer the rights to Kino Polska TV. Four further decisions concerned changes to the name of the programme, two concerned changes to the programme structure, and one decision involved a complete change of both name and programme content.

Two licences of CANAL+ Polska were revoked at the request of the broadcaster.

Attachment No. 8 lists the decisions issued in relation to the distribution of satellite TV programmes.

13.6. Television programmes on telecommunications networks

In 2024, there were 19 applications for the granting of new licences, seven applications for the granting of licences for the following period and 33 applications for the extension by further networks of licences for the distribution of programmes in telecommunication networks.

The Chairman of the KRRiT issued 28 concessions for the distribution of television programmes in telecom networks (16 new concessions and 12 concessions for a further period). The new concessionaires included 11 commercial law companies, three housing cooperatives, one foundation and one natural person.

Seven concessions implement universal programming, nine concessions were granted for various specialised programmes: three news and current affairs programmes, one entertainment programme, one travel and culinary programme and one documentary programme. The new programmes, as stipulated in the licencing agreement, have differentiated broadcasting times; the maximum time is a daily 24-hour broadcast, while the minimum time is one hour a day once a week.

The Chairman of the KRRiT also issued 45 decisions related to amending the concession at the request of a broadcaster (31 amendments related to the extension of the licence duration to include new telecommunications networks or the introduction of other technical changes, three were related to the transfer of rights from an individual to a commercial law company, and one to the transformation of the entity into another form of commercial law company). Four decisions were issued in cases concerning the change of the name of the programme or the name of the concessionaire, and two decisions were issued on the change of specialisation together with the change of the minimum broadcasting time, while one decision concerned the change of the name of the programme and its structure. Six decisions were also issued to revoke the

⁹⁶ See pt. 13.3

concession at the request of the broadcaster. Reasons given for such requests included the broadcaster's difficult financial situation, the lack of prospects and favourable conditions for broadcasting, as well as difficulties in acquiring broadcasts meeting the requirements of the licence. One licence was revoked due to permanent cessation of broadcasting, and three notices to leave applications pending were issued as a result of failure to complete the documentation.

Attachment No. 9 contains a list of new licences issued in 2024 and licences granted for the next period for the distribution of programmes on the so-called cable networks.

Attachment No. 10 contains a list of decisions issued in 2024 on changes to the so-called cable licences.

13.7. Must carry/must offer principle – mandatory broadcasts⁹⁷

The must carry principle obliges programme distributors to include the following programmes in their offer: TVP1, TVP2, Polsat, TVN, TV4, TV Puls and TVP regional centres. Under the must offer principle, broadcasters designated in the must carry principle are obliged to make their programmes available to operators. Broadcasters of these programmes may not refuse to make their signal available or make their consent conditional on the payment of any remuneration.

Consequences of changes to the copyright law

In their letters to the National Broadcasting Council, operators argue that the terms and conditions of the agreement presented by broadcasters significantly hinder them in fulfilling their statutory obligation or make it impossible to fulfil. Broadcasters also have raised problems with fulfilling their obligations. The problems concerning the terms and conditions of the agreement made known by operators and broadcasters include:

- the condition of distributing programmes ‘without additional charges’ and ‘without the need for the subscriber to purchase any additional services’;
- the condition of distributing programmes ‘without the need to register an account and log in to the operator’s website or application’;

⁹⁷ The *must carry/must offer* principle is described in Articles 43 and 43a of the Broadcasting Act. Pursuant to these provisions, broadcasters specified in the Act are required to make their programme signal available to operators (satellite, cable or internet) distributing programmes without demanding remuneration. Operators, on the other hand, are required to include the programmes specified by law in their offer in their entirety and without changes. This rule applies to the following programmes: ‘*Telewizja Polska I*’, ‘*Telewizja Polska II*’ and one regional television programme broadcast by *Telewizja Polska S.A.*, as well as programmes broadcast on the date of entry into force of [the Act](#) of 30 June 2011 on the implementation of digital terrestrial television (Journal of Laws of 2016, item 649) on the basis of a licence to broadcast these programmes in analogue form by way of terrestrial broadcasting by *Telewizja Polsat S.A.*, *TVN S.A.*, *Polskie Media S.A.* and *Telewizja Puls Sp. z o.o.* In the case of an operator distributing programmes in telecommunications networks other than those used for terrestrial or satellite broadcasting, the obligation to distribute a regional television programme applies to the regional television programme relevant to the area concerned.

- a condition requiring the distribution of programmes without removing ‘signal components’;
- the condition of distributing programmes in the form of upscaling⁹⁸ or downscaling⁹⁹ (the operators' reservation stems from the wording of the provision, as the signal is distributed by them in a secondary manner).

Broadcasters and operators also asked the National Broadcasting Council for help with growing doubts about how to apply the amended Copyright and Related Rights Act. These doubts were mainly about:

- the understanding of the concept of ‘direct introduction’ in the context of the broadcasting and distribution of programmes referred to in the Radio and Television Broadcasting Act¹⁰⁰;
- whether the Act resolves the issue of rebroadcasting by OTT platforms in connection with the method of calculating copyright fees for broadcasters.¹⁰¹

On 12 February 2025, the National Council adopted a regulatory position on the above matter concerning the obligations under the Broadcasting Act with regard to programmes introduced directly.¹⁰²

Judgment of the Court of Appeal in Warsaw in the case of free access to a programme for a programme distributor¹⁰³

In its decision, the Chairman of the National Broadcasting Council stated that the broadcaster had failed to comply with the request to make programmes available free of charge to the programme distributor. The broadcaster accused the authority of using coercion leading to copyright infringement and misinterpreting Article 43(2) of the Broadcasting Act.

The court did not uphold the allegation of misinterpretation of Article 43(2) of the Act or the allegation that the authority had violated the provisions of the Act on Copyright and Related Rights. It found that Articles 43 and 43a of the Act constitute a kind of restriction on the right to broadcast, which is granted to the broadcaster under Article 97 of the Act on Copyright and Related Rights. The relations between the broadcaster and other entities using its broadcasts in a different manner, as well as the mutual relations between the broadcaster, the operator and

⁹⁸ Upscaling involves converting material with a lower resolution to a higher standard.

⁹⁹ Downscaling is the opposite of upscaling.

¹⁰⁰ Article 4(7) of the Broadcasting Act defines programme distribution as the transmission of a programme by wireless or wired means for reception by recipients. Article 4(8) defines distribution as the taking over of a broadcast programme in its entirety and without changes and its simultaneous secondary distribution.

¹⁰¹ The problem arises from the broadcaster's refusal to make programmes available or the lack of a field of exploitation.

¹⁰² See: <https://www.gov.pl/web/krrit/stanowiska-krrit2>

¹⁰³ Judgment of the Court of Appeal in Warsaw of 6 August 2024 (Case no. VII AGa 243/24) dismissing the appeal of Telewizja Polsat against the decision of the Chairman of the National Broadcasting Council to punish the broadcaster for failing to make the programmes ‘Polsat’ and ‘TV4’ available to the Housing Cooperative in the city of Grudziądz. See: <https://www.gov.pl/web/krrit/sad-apelacyjny-w-warszawie-oddalil-apelacje-telewizji-polsat-sp-z-oo-w-sprawie-z-odwolania-od-decyzji-przewodniczacego-krrit-o-ukaraniu>

other entities in respect of rights other than the right to broadcast, remain outside the scope of the Act and should be determined by the entities concerned in accordance with the relevant provisions. The court pointed out that the legislator had not introduced any restrictions on the concept of recipient. Therefore, it cannot be considered that the free provision of a programme should be made exclusively to end users who are not entities providing programmes to other users. The court held that since none of the provisions of the Act authorises the broadcaster to choose the type of recipient to whom the programme made available by him may be distributed, there are no grounds for distinguishing between operators distributing programmes depending on the type of entities to whom the programme is distributed. Therefore, it cannot be considered that an entity carrying out an activity can be regarded as an end user if it receives programmes for its own purposes.

According to the judgment, it cannot be considered that the correct application of Article 43(1) of the Act is subject to restriction in relation to end users within the meaning of telecommunications regulations. Where the legislator does not use the term ‘end user’ in the Act, there is no basis for referring to the definition of that term contained in telecommunications regulations. The definition of end user provided in the telecommunications regulations refers to the must-carry obligation imposed on undertakings that provide electronic communications networks used for the dissemination of radio or television channels to the general public. With regard to these entities, it is pointed out that the end user uses telecommunications services not for purposes related to his economic activity, but to satisfy his own needs.

13.8. Supervision over the implementation of television licences

The National Broadcasting Council systematically monitors the implementation of the conditions laid down in the licences. In 2024, nine monitoring exercises were carried out, during which the fulfilment of the programming conditions of the licences was checked in eight television programmes: Białgorajska Telewizja Kablowa, NOWA TV, Polsat Cafe, Red Carpet TV (RCTV), Studio Petrus, Telewizja Orion, TVC (twice) and TVN Style.

Six broadcasters fulfilled their licence obligations. In the case of TVC and Red Carpet TV (RCTV), the Chairman of the National Broadcasting Council issued calls to the broadcasters to cease activities that violated the licence conditions.

13.9. Updating the list of important events

In 2024, the National Council continued its work on a draft regulation on the list of important events. The draft regulation specifies a list of important events other than those listed in Article 20b(2) of the Act which are of public interest and are significant for social, economic and political life.

The National Broadcasting Council adopted a draft regulation on this matter and commissioned a working group to prepare a notification document and take further steps related to the notification of the update of the Polish list to the European Commission. Notification of the

list of important events is necessary in order to obtain legal protection throughout the European Union. The Minister of Culture and National Heritage issued a negative opinion on the draft amendment, while pointing out that the issuance of the regulation falls within the exclusive competence of the National Broadcasting Council.

Compared to the current regulation of 17 November 2014 on the list of important events, the draft introduces the following changes:

- updating the name of the Volleyball Nations League¹⁰⁴ and adding matches outside the country involving the Polish national team;
- adding the semi-finals and finals of the Men's Basketball World Cup and European Championships, as well as all other matches within these events involving the Polish national team, including qualifying matches;
- adding matches involving Polish players in the following tennis tournaments: Australian Open, Roland Garros, Wimbledon and US Open;
- adding matches involving Polish clubs in the UEFA Conference League;¹⁰⁵
- adding matches involving the Polish national team in the Men's Ice Hockey World Championship;
- removal of the Women's Cross-Country Skiing World Cup from the list of competitions.

14. Licensed radio broadcasting

14.1 Granting radio licences

The National Broadcasting Council supports the development of local radio broadcasting by allocating free frequencies for the granting or extension of local programmes, endeavouring to select entities operating in a given area. In 2024, the National Council issued two licences for universal local programmes in Białystok and Andrychów, and adopted resolutions on the granting of licences for universal local programmes in Łódź and Częstochowa.

Not all local entrepreneurs are willing to start radio broadcasting in all localities, and sometimes such entities do not meet the criteria for granting a licence. The National Council has no legal possibility to invalidate such proceedings. In this situation, the decision must be made in favour of the local station network that submits the most valuable proposal. It was in these circumstances that, in 2024, a licence was granted to Multimedia for the RMF MAXX Tomaszów Mazowiecki programme and to the Association for the Development of Radio Broadcasting in Elbląg for the Z Wami FM Suwałki programme (currently ESKA Suwałki).

¹⁰⁴ The Volleyball Nations League was established to replace the World League, which was organised between 1990 and 2017.

¹⁰⁵ Following a decision by the UEFA Executive Committee, the UEFA Europa Conference League will be renamed the UEFA Conference League from the 2024/25 season.

In November 2024, the National Broadcasting Council adopted a resolution on the allocation of new frequencies for the purpose of conducting licence proceedings for the broadcasting of radio programmes.

The proceedings will concern frequencies allocated for the development of local radio broadcasting in Kwidzyń, Zawiercie, Kalisz, Słupsk (a programme aimed at the Kashubian minority) and Starogard Gdański.

14.2. Extension of radio licences to include a new broadcasting station

Where the technical conditions are right, the Chair of the National Broadcasting Council is starting a process to see if licences can be extended to include a new transmitter, which would let them cover more areas. When changing licences, the National Broadcasting Council is thinking about the needs of local broadcasters.

This will increase the broadcasting range of four local broadcasters in Łowicz and Skierniewice, as well as in Sierpc, Wola near Czerwińsk and Porażyn, based on resolutions adopted in 2024 and licence decisions issued on that basis.

Attachment No. 11 contains a list of proceedings for the granting or extension of licences for the broadcasting of radio programmes by propagational terrestrial means, conducted in connection with announcements by the Chairman of the National Broadcasting Council, and decided by resolution or concluded by the issuance of a decision in 2024.

14.3. Change in the technical conditions for programme broadcasting

In order to improve radio signal quality or increase the broadcasting area of a programme, a broadcaster may apply for a change in the technical conditions specified in the licence. Such changes shall be made in consultation with the President of the Office of Electronic Communications, provided that they do not adversely affect the operation of other stations.

In 2024, the Chairman of the National Broadcasting Council issued 22 decisions on changes to the technical conditions of terrestrial radio licences, including 10 decisions resulting in an increase in population coverage.

The technical changes made to the licence granted to Mr Marcin Marzec covered an additional 151,600 people, which doubled the population coverage in Lublin. In turn, the changes made to the licence of Eurozet Radio allowed the station in Będzin to reach almost 87,000 new listeners. Furthermore, changes to the technical conditions of two licences held by the ZPR Group for broadcasting programmes in Toruń enabled each of these programmes to increase their potential audience by several thousand people.

Attachment No. 12 contains a list of terrestrial radio licences in which technical changes have been made.

14.4. DAB+ digital radio programmes

The further development of terrestrial radio depends on the decision on the analogue-to-digital conversion. The first licences for local programmes in the DAB+ standard were granted in 2019. Currently, there are seven local multiplexes operating in DAB+: Poznań, Tarnów, Częstochowa, Katowice, Warsaw, Rzeszów and Toruń. At the end of 2023, 19 broadcasters had the right to broadcast in DAB+ on the basis of 31 licences (17 new licences and 14 licences extended to include this right). In 2024, RD Plus (operating within the WP Holding Capital Group), a broadcaster of seven programmes in the DAB+ standard, applied to the National Broadcasting Council for the revocation of its licences, justifying its decision with unsatisfactory results in this area, the need to reduce costs and the capital group's focus on other projects. In connection with the above, the Chairman of the National Broadcasting Council issued seven decisions revoking licences for radio programmes in this standard. The licence of Loctra was also revoked in respect of the right to broadcast a radio programme digitally via terrestrial broadcasting in a digital multiplex in Poznań. The company decided to discontinue digital broadcasting due to the high costs of broadcasting in this system.

At the end of 2024, 23 programmes were broadcast in the DAB+ standard under licence, distributed by 17 broadcasters. Most of these were general-interest programmes (15). In addition, DAB+ offered specialised programmes: four social and religious, three music and cultural, and one news, business and music programme.

Attachment No. 13 contains a list of licences for the distribution of radio programmes in DAB+.

Attachment No. 14 contains a list of licences for radio programmes broadcast in the DAB+ standard that were revoked at the request of the broadcaster in 2024.

14.5. Radio licences for the next period

The National Broadcasting Council granted 11 radio licences for the next period: seven licences were granted to local universal programme broadcasters, three were granted to a network of local music programmes, and one licence for the next period was granted to a local music and cultural programme broadcaster.

Attachment No. 15 contains a list of decisions on the granting of terrestrial radio licences for the next period.

14.6. Control of the implementation of radio licences

In 2024, 22 radio programme monitoring exercises were carried out to check compliance with the programme licence conditions:

- two monitoring exercises of programmes from the AGORA group: *Radio Złote Przeboje* 92.8 FM and *Radio Złote Przeboje* 93.2 FM;
- one monitoring of a programme from the RMF group – *Radio Gra* Wrocław;
- six monitorings of programmes from the TIME group: ESKA Ostrzeszów and ESKA Rock, ESKA2 Trójmiasto, VOX FM Gorzów and VOX FM Radom (twice);
- eleven monitoring reports on programmes of independent local broadcasters: Bayer FM, Muzyczne Radio, Norda FM, POPradio, Radio Bartoszyce, Radio FEST, Radio Impuls, Radio Parada, Radio Rekord Mazowsze (twice) and Radio Vanessa;
- one monitoring report on the academic programme Radio Akadera;
- one monitoring of Radio AM Andrychów (broadcast over medium waves).

In 15 monitoring reports, the broadcaster's compliance with the licence conditions was confirmed. In the case of six programmes: VOX FM Gorzów, VOX FM Radom, Radio Rekord Mazowsze, Radio Bartoszyce, RadioParada and Radio Vanessa, a breach of the licence conditions was found. The broadcasters of these programmes were requested to provide explanations, and in four cases the Chairman of the National Broadcasting Council issued requests to cease activities that violated the licence conditions.

In the crisis situation related to the flood and its consequences, many broadcasters, in fulfilling additional information obligations, had to suspend the implementation of certain programme conditions and adapt their programmes to the current challenges. The National Council took these circumstances into account in the process of assessing the fulfilment of licence and programming obligations, including those arising from Articles 15, 15a and 15b of the Broadcasting Act.

14.7. Payment of licence fees in instalments

The Broadcasting Act provides for the possibility of paying the fee for the granting or amendment of a licence in instalments.¹⁰⁶ The method of payment is declared in the application for the granting or amendment of a licence. In 2024, the fees charged in 18 decisions of the Chairman of the National Broadcasting Council (11 decisions concerned radio broadcasters and seven television broadcasters) were spread out into instalments.

In addition to this option, the Public Finance Act allows for the deferral of payment, payment in instalments of licence fees or partial remission in cases justified by social or economic reasons.¹⁰⁷ It is also possible to remit the entire amount due in cases justified by the important

¹⁰⁶ See Article 40(10) of the Broadcasting Act.

¹⁰⁷ See Article 64(1)(2) of the Public Finance Act of 27 August 2009.

interests of the debtor or the public interest. In 2024, the Chairman of the National Broadcasting Council issued three decisions on payment in instalments and one decision on deferral of payment. One decision was also issued on the discontinuation of proceedings which had become moot due to the earlier payment of the fee. However, two decisions refused to grant relief due to the KRRiT's inability to make an unambiguous assessment of the broadcaster's financial situation.

Attachment No. 16 contains a list of entities to which the amount due under a decision granting or amending a licence has been divided into instalments (pursuant to Article 40(10) of the Broadcasting Act).

Attachment No. 17 contains a list of proceedings concerning relief granted under the Public Finance Act.

14.8. Programme changes in terrestrial radio licences

On the basis of applications submitted by broadcasters, the Chairman of the National Broadcasting Council issued 11 decisions concerning changes to licensed radio programmes which are broadcast terrestrially. Most of these changes concerned corrections to the names of the programmes broadcast. In four cases, a provision was added allowing the calculation of the share of local content in the programme to exclude the holiday period, i.e. July and August. One decision concerned both a change in the calculation of the share of local content during the holiday period and a change in the programme structure by reducing the share of spoken programmes and local content in the programme. In four cases, after considering the requests for changes, negative decisions were issued.

Attachment No. 18 contains a list of decisions on programme changes in licences for terrestrial radio broadcasting (name changes or other programme changes).

15. VoD and VSP services. Programmes distributed exclusively via an ICT system and distributed programmes

15.1. Obligation to enter the register Audiovisual on-demand services (VoD)

One hundred and forty two (142) applications for entry in the VoD register had been received by the end of 2024. Based on these and earlier notifications, the Chairman of the National Broadcasting Council issued 183 decisions on inclusion in the VoD register. In 2024, many providers avoided the obligation to notify the VoD service to the register kept by the Chairman of the National Broadcasting Council, and thus to assume the obligations related to compliance with resultant statutory obligations. The KRRiT also receives complaints about failure to submit

notifications. Providers explained their failure to enter the register by the fact that they did not generate any revenue from the video content offered, which is usually placed on VSP platforms.

The KRRiT has considerable difficulties in obtaining identification data for individual channels, profiles or accounts in order to initiate administrative proceedings in the event of violations of the Broadcasting Act.

The Chairman of the National Broadcasting Council initiated 24 administrative proceedings to impose penalties for failure to register in the VoD register and issued seven decisions imposing penalties for this violation.

Currently, the register contains 659 entries concerning VoD services and 14 entries concerning VSP platforms.¹⁰⁸ The National Broadcasting Council estimates that the obligation to register in the register applies to several thousand to several tens of thousands of online creators who place their programmes or catalogues consisting of such programmes on VSP platforms (including YouTube, Tik Tok, Facebook, Instagram).¹⁰⁹ The huge number of entities,¹¹⁰ problems with their full identification, and difficult access to contact details are the main reasons for the slowdown in the process of completing the lists.

Video sharing platforms (VSP)

Currently, there are 14 entries concerning VSPs in the list.¹¹¹
In 2024, only one application for entry was submitted to the VSP list.

Programmes distributed and television programmes broadcast exclusively via an ICT system

In 2024, 249 notifications were received concerning programmes distributed and television programmes broadcast exclusively via an ICT system. These notifications formed the basis for 263 decisions to make an entry. A verification of entities broadcasting television programmes exclusively via an ICT system was carried out. Two hundred and two (202) requests for clarification on the validity of entries in the register were sent to ICT broadcasters, to which 138 responses were received. On the basis of the verification, the Chairman of the National Broadcasting Council issued 24 decisions to remove television programmes from the list, mainly at the request of those entities due to the fact that they had ceased their broadcasting activities.

¹⁰⁸ The list is publicly available on the KRRiT website at:

<https://www.gov.pl/web/krrit/lista-dostawcow-audiowizualnych-uslug-medialnych-na-zadanie2>

<https://www.gov.pl/web/krrit/lista-dostawcow-platform-udostepniania-wideo-wpisanych-do-wykazu-przewodniczacego-https://www.gov.pl/web/krrit/lista-dostawcow-platform-udostepniania-wideo-wpisanych-do-wykazu-przewodniczacego-krrit-na-podstawie-art-1a-ust7-urt>

¹⁰⁹ Pursuant to Article 4(6a) of the Broadcasting Act, an on-demand audiovisual media service is a media service: provided as part of business activities in this field, consisting in making audiovisual programmes available to the public on the basis of a catalogue established by the service provider.

¹¹⁰ According to data presented at the IAB *HowTo conference: New horizons in influencer marketing*, there are over 700,000 influencers with over 1,000 followers in Poland, and the number of influencers with over 10,000 followers is 74,000.

¹¹¹ See footnote 107.

This also concerned the distribution of television programmes exclusively on the Internet. The inspection revealed that some of these entities provide VoD services instead of distributing programmes. Therefore, they were informed of the need to register the VoD service they provide in the relevant register kept by the Chairman of the National Broadcasting Council.

KRRiT's position on the classification of e-learning services ¹¹²

In its position of 23 August 2023, the KRRiT stated that e-learning services cannot be classified as on-demand audiovisual media services. In March 2024, the Chairman of the National Broadcasting Council requested e-learning platform providers to verify the service they provide (e-learning platform) and, if necessary, to report the need to remove it from the list of VoD services. Fifty e-learning service providers took advantage of this option.

15.2. Obligations to provide explanations and materials at the request of the Chairman of the National Broadcasting Council (KRRiT)

Pursuant to the Broadcasting Act, the Chairman of the National Broadcasting Council has the right to request a media service provider, a video-sharing platform provider or a radio or television programme distributor to provide materials, documents and explanations. ¹¹³ If such an entity fails to provide information or provides incomplete, unreliable data, the Chairman of the National Broadcasting Council may impose a penalty only on the person managing the activities of the media service provider. The Chairman of the National Broadcasting Council therefore has no legal basis for imposing penalties on video-sharing platform providers or operators distributing programmes. ¹¹⁴

In practice, this is of great importance, especially in view of the challenges associated with content presented in cyberspace. This situation results in unequal treatment of entities obliged to comply with the law. Furthermore, the fact that the penalty depends on the amount of remuneration raises a number of problems. In light of personal data protection and privacy, the question arises as to whether the President of the National Broadcasting Council is entitled to obtain information about an employee's remuneration in order to determine the amount of the penalty. The President of the National Broadcasting Council has proposed that the amount of the penalty should be based on objective criteria, i.e. the average monthly remuneration in the business sector.

¹¹² <https://www.gov.pl/web/krrit/stanowiska-krrit2>

¹¹³ See Article 10(2) of the Broadcasting Act.

¹¹⁴ See Article 54(2) of the Broadcasting Act.

15.3 Control of VoD providers in terms of reporting on compliance with statutory provisions and financial reporting

VoD providers are required to submit annual reports on compliance with the provisions of the Broadcasting Act in the following areas: protection of minors, promotion of European works and works originally produced in Polish, and facilities for persons with disabilities.¹¹⁵ By the end of 2024 due to failure to submit reports for 2023, 340 VoD providers were requested to provide explanations and 40 notices were sent to initiate administrative proceedings aimed at imposing financial penalties. At the same time, providers were reminded of their obligation to submit information on annual revenues and costs for each of the media services provided separately.¹¹⁶

15.4. Inspection of the terms and conditions of electronic service provisions by VSP providers

The inspection of the content of the terms and conditions for the provision of electronic services carried out in 2024 revealed that:

- only the terms and conditions of three providers contained information on the characteristics and detailed conditions for the classification and labelling of user-generated programmes or videos and on the models of the relevant graphic symbols required for the protection of minors;
- only the terms and conditions of six providers contained the information required by the KRRiT Regulation on the rules for placing commercial communications in video programmes created by users and other communications placed on video-sharing platforms by users;¹¹⁷
- only eight VSP providers included in their terms and conditions information on how to report that a programme offer posted on the platform violates the prohibition on posting certain content, together with information on the procedure for handling such reports;¹¹⁸
- also, eight VSP providers set out in their terms and conditions the criteria for assessing the compliance of user-generated video broadcasts and other communications;
- eight VSP providers also included in their terms and conditions information on the possibility of lodging complaints against decisions of the video-sharing platform provider and information on other legal remedies available to platform users.¹¹⁹

¹¹⁵ This obligation arises from Article 47j of the Broadcasting Act. Article 47j of the Act imposes an obligation on media service providers to submit, upon request, a report on the fulfilment of the obligations referred to in Article 47e(1) and (2) (application of technical safeguards or other appropriate measures to protect minors from content harmful to them); Article 47f (promotion of European programmes, including those originally produced in Polish) and Article 47g(1)-(4) (share of programmes containing facilities for persons with disabilities, with an indication of the share of each type of facility).

¹¹⁶ In accordance with Article 37a of the Broadcasting Act.

¹¹⁷ See Article 47q(2) of the Broadcasting Act.

¹¹⁸ See Article 47o of the Broadcasting Act.

¹¹⁹ See Article 47t(1) and (2) and Article 47u of the Broadcasting Act.

Only information on the scope and purpose of the processing of VSP users' personal data was included in the terms and conditions of all VSP providers inspected.

An analysis of the activities of 16 video-sharing platforms¹²⁰ was carried out in April and May 2024. Among other things, requests were sent to 13 video-sharing platform providers to provide explanations regarding the protection of minors in connection with the obligation to apply appropriate technical safeguards; to 6 platforms were sent requests regarding the information obligations available on the platform's website; 11 requests were sent regarding the terms and conditions of electronic services; to 12 providers regarding the promotion of media literacy within the VSP platform.¹²¹ In October, 14 services were re-inspected (two services were removed from the list in June and July 2024). Only in two cases were the platforms found to meet all the requirements. VSP providers included in the list of the Chairman of the National Broadcasting Council were sent requests to provide information on the fulfilment of their information obligations. The inspection revealed that three service providers on five platforms covered by the analysis had not fulfilled their obligations. Requests were sent to them.

In order to support cooperation with providers and clarify the detailed statutory requirements, the Chairman of the National Broadcasting Council organised an online meeting with representatives of the platforms, during which the statutory obligations were discussed and expectations regarding the functioning of the protection tools were presented.

15.5. Inspection of compliance with information obligations – VoD

The information obligation consists in providing easy, direct and continuous access to information that will help recipients identify services and the entities providing them.¹²²

In 2024, the Chairman of the National Broadcasting Council sent requests to 349 entities to provide information on the fulfilment of their statutory information obligations, including by indicating the exact address of the website where information such as the names of partners, general partners, shareholders, beneficial owners is published, as well as where a list of all media services, video sharing platforms, newspapers and magazines is available. The National Broadcasting Council will systematically monitor the fulfilment of these obligations.

15.6. Monitoring of the information obligation in VSP services¹²³

The monitoring showed that 11 VSP providers provided their subscribers with the information about the provider and partners required by law on their websites or in their terms and

¹²⁰ See the obligations under Article 47p(3), 47q(2), 47o(1), Article 47s, 47t(1) and (2), 47m(1) and (2) of the Broadcasting Act.

¹²¹ See Article 47p(1), Article 47m(2) and (3), Article 47r, Article 47w of the Broadcasting Act.

¹²² See Article 14a(1)-(2) of the Broadcasting Act.

¹²³ See Article 47c of the Broadcasting Act.

conditions.¹²⁴ VSP providers included in the list of the Chairman of the National Broadcasting Council were sent requests to provide information on the fulfilment of these information obligations. A re-inspection of the information obligations showed that all entities had fulfilled these tasks.

16. The work of the National Broadcasting Council on the international stage

The primary goal of the National Broadcasting Council on the international stage is to protect media freedom, look after the interests of viewers and listeners, and ensure a balance between the interests of different media groups. The National Council has participated in the work of various international bodies, including two industry-specific bodies – the European Regulators Group for Audiovisual Media Services (ERGA) and the European Platform of Regulatory Authorities (EPRA) – as well as advisory and expert bodies operating within the European Commission and the Council of Europe. The National Broadcasting Council acts as Poland's independent representative in these bodies.

In previous years, in the case of bodies such as the Management Committee on Media and Information Society (CDMSI), the Contact Committee on the Audiovisual Media Services Directive, the Working Group on Audiovisual Media Services (AUDIO), and the Expert Group on Digital Services (DSA Expert Group), the National Broadcasting Council participated as a body supporting the activities of the government (Ministry of Culture and National Heritage and Ministry of Digital Affairs). In 2024, the competent ministries did not continue their cooperation with the National Broadcasting Council in terms of participation in the work of these intergovernmental committees and expert groups.

The National Council monitors legislative changes in the European Union and, in this regard, prepares positions and opinions, which are most often forwarded to the Minister of Culture and National Heritage and the Minister of Digital Affairs. The Chairman of the National Broadcasting Council participated, among other things, in the adoption of opinions and positions on legislative changes in the media area prepared by ERGA.

The National Broadcasting Council is active in all work related to the implementation of EU solutions into national legislation, seeing itself as a regulator in new areas of media law and digital services, in particular those related to the protection of recipients, including children and young people, the dissemination of commercial communications, media pluralism and transparency of ownership, accessibility of content with facilities for people with hearing or visual impairments. In 2024, KRRiT representatives participated in work on the European Media Freedom Act (EMFA) and the Digital Services Act (DSA), among other things.

¹²⁴ See Article 47m(1) and (2) of the Broadcasting Act.

The Chairman of the National Broadcasting Council repeatedly informed regulatory authorities from other countries and representatives of the European Commission at the ERGA and EPRA forums about the situation of the public media in Poland and about the financial pressure and attempts by the current government and parliament to undermine the independence of the National Broadcasting Council.

16.1. Industry organisations

European Regulators Group for Audiovisual Media Services (ERGA)

Rapporteur 2024 is practically the last year of ERGA's operation in its current form.¹²⁵ Pursuant to Article 8 of the European Media Freedom Act (EMFA), as of 8 February 2025, ERGA has been transformed into the European Media Services Council (ERUM) and its powers have been significantly expanded.

Article 13 of the European Media Freedom Act (EMFA) sets out the following tasks for the European Media Services Council (EMSC):

- providing the EC with expert support on ensuring the consistent and effective application of Chapter III of the EMFA and the implementation of Directive 2010/13/EU, without prejudice to the tasks of national authorities or regulatory bodies;
- promoting cooperation and effective exchange of information, experience and best practices between national regulatory authorities in the application of Union and national provisions applicable to media services, including the provisions of the EMRA and Directive 2010/13/EU, in particular Articles 3, 4 and 7 thereof;
- at the request of the Commission, in consultation with the Commission, preparing opinions on:
 - requests for cooperation between national authorities or regulatory bodies in accordance with Article 14(5) of the EMFA;
 - requests for enforcement measures in the event of disagreement between the requesting authorities and the requested authorities, including recommended actions, on the basis of Article 15(3) of the EMFA;
 - national measures concerning media services from outside the Union, in accordance with Article 17(2) of the EMFA;
- at the request of a media service provider with which a very large online platform has engaged in dialogue as referred to in Article 18(6) of the EMFA, preparing opinions on the outcome of such dialogue;
- on its own initiative, at the request of the Commission or at the duly justified and reasoned request of a media service provider individually and directly concerned, issuing

¹²⁵ ERGA was established in 2014 by a decision of the European Commission. Since 2018, its role and tasks have been clarified by the amended Audiovisual Media Services Directive. ERGA members are high-level representatives of the regulatory authorities for audiovisual media services in the EU Member States. The group advises the European Commission on electronic media issues and facilitates ongoing cooperation between European audiovisual regulators.

opinions on regulatory or administrative measures that may significantly affect the activities of media service providers in the internal market for media services, in accordance with Article 21(4) of the EMFA;

- preparing opinions on draft assessments or draft opinions of national regulatory authorities, in accordance with Article 22(5) of the EMFA;
- on its own initiative or at the request of the Commission, preparing opinions on media market concentrations that may affect the functioning of the internal market for media services, in accordance with Article 23(1) of the EMFA;
- assisting the Commission in drawing up guidelines on:
 - the application of the EMFA and the implementation of Directive 2010/13/EU, in accordance with Article 16(2) of the EMFA;
 - the elements referred to in Article 22(2)(a), (b) and (c) of the EMFA, in accordance with paragraph 3 thereof;
 - the application of Article 24(1), (2) and (3) of EMFA on the basis of paragraph 4 of that Article;
- at the request of at least one national authority, mediating in the event of disagreement between regulators, in accordance with Article 15(3) of EMFA;
- encouraging cooperation on the development of harmonised standards relating to the design of devices or user interfaces or on digital signals transmitted by such devices, in accordance with Article 20(5) of the EMFA;
- coordinating the relevant measures taken by national regulatory authorities in relation to the dissemination of media content originating outside the Union and directed at or accessible to target audiences in the Union, where such services cause harm to public security or pose a serious and imminent risk of such harm, in accordance with Article 17(1) of the EMFA and in consultation with the Commission, drawing up the set of criteria referred to in paragraph 4 of that Article;
- conducting an organised dialogue between very large online platform providers and representatives of media service providers and civil society, and reporting to the Commission on the results of such dialogue, in accordance with Article 19 of the EMFA;
- supporting the exchange of best practices related to the implementation of audience measurement systems, in accordance with Article 24(5) of the EMFA;
- exchanging experiences and best practices in media literacy, including with a view to supporting the development and use of effective measures and tools to improve media literacy;
- drawing up detailed annual reports on its activities and tasks.

In 2024, four working groups and one action group involving representatives of the National Broadcasting Council operated within ERGA. These groups prepared reports on:¹²⁶

- measures and safeguards for the protection of minors in the online environment;
- transposition and implementation of the following provisions of the Audiovisual Media Services Directive: Article 13(1) (exposure of European works), Article 13(2) (financial contribution to the production of European works) and Article 13(6) (exemption from obligations in this regard due to low viewing figures);

¹²⁶ ERGA's published reports and positions are available at https://erga-online.eu/?page_id=14.

- good practices in the use of AI tools to apply the requirements of the Audiovisual Media Services Directive;
- regulation and promotion of the accessibility of audiovisual media services for persons with disabilities, review of good practices and recommendations for a more harmonised approach in this area;
- application by ERGA members in 2024 of the Memorandum of Understanding on voluntary cooperation and a summary of the four years of operation of this tool (in the context of transforming the voluntary nature of this tool into an obligation to cooperate under EMFA provisions);
- the establishment and functioning of ERUM as the legal successor to ERGA (internal reports);
- monitoring of the Code of Practice on Disinformation – experiences, observations and recommendations of ERGA members (internal report);
- the competence and analytical capabilities of national regulators in the field of countering disinformation (internal report);
- ERGA statements on progress and challenges related to the Code of Practice on Disinformation (public position);
- implementation and cross-border application of the European legislative framework for audiovisual and digital services, i.e. mainly the relationship between the DSA, the Audiovisual Media Services Directive and the EMFA (analysis of new and existing EU legal frameworks and their interference);
- implementation and cross-border enforcement of the European legal framework for digital and audiovisual media services, including the internal annex on the participation of ERGA members in the implementation of the DSA, which shows that 11 regulators act as national coordinators for digital services within the meaning of the DSA in their respective countries; 6 regulators act as so-called competent authority within the meaning of the DSA, and 4 regulators have another role in the application of the DSA. Only 6 regulators do not have any national role in the application of the DSA.

In 2024, ERGA issued three positions on:

- draft EC guidelines for very large online platforms and very large search engines on mitigating systemic risks in electoral processes;
- views on future media policy priorities (summary for the new EC composition);
- the European Media Freedom Act (EMFA).

The position of the Chairman of the National Broadcasting Council on EMFA is consistent and indicates that this regulation is incompatible with the provisions of the Treaty on the Functioning of the European Union, which was reflected in the vote against the ERGA Position on EMFA.

Single point of contact (SPOC)

As part of the commitment adopted by ERGA members in December 2020 in the Memorandum of Understanding (ERGA Memorandum of Understanding), the National Broadcasting Council ensures the functioning of the Single Point of Contact (SPOC), which prepares requests for information and requests for cooperation specified in the Memorandum of Understanding, as well as responds to requests received from other countries.

In 2024, the SPOC operating at the National Broadcasting Council forwarded several requests for information and cooperation to SPOCs in other national regulatory authorities and prepared and forwarded several responses to such requests from other countries. The questions concerned, among other things: territorial jurisdiction, the share of European works in VoD catalogues, media concentration in connection with the implementation of EMFA, the classification of media services on the 'X' platform, providers of pornographic channels on VSP platforms, the implementation of the Accessibility Directive, product placement, and the registration of vloggers.

European Platform of Regulatory Authorities (EPRA)

The European Platform of Regulatory Authorities has been operating since 1995. The organisation brings together regulatory authorities from 47 countries and permanent observers representing the European Commission, the Council of Europe, the European Audiovisual Observatory and the OSCE Representative on Freedom of the Media. The National Broadcasting Council is a founding member of this organisation.

EPRA organises cooperation between national regulatory authorities and the exchange of experience in regulatory practice concerning electronic media. During two plenary meetings in 2024, participants discussed issues such as media literacy, the impact of artificial intelligence on the media and implications for market regulators, and the role of regulatory authorities in combating hateful content.

The Chairman of the National Broadcasting Council, who participated in the EPRA meeting, informed the other participants about the current situation in Poland with regard to the appropriation of public media by the current government and the related threats, as well as the threat to the independence of the National Broadcasting Council.¹²⁷

16.2. The European Commission

Media Literacy Expert Group (MLEG)

¹²⁷ See the statement by the Chairman of the National Broadcasting Council delivered at the EPRA meeting in Rotterdam, <https://www.gov.pl/web/krit/oswiadczenie-przewodniczacego-krit-macieja-swirskiego-wygloszone-6-czerwca-2024-r-podczas-59-konferencji-europejskiej-platformy-organow-regulacyjnych-epra-w-rotterdamie>

The Media Literacy Expert Group (MLEG) is an advisory working group established by the European Commission in the field of media literacy. Representatives of EU institutions, non-governmental organisations and academics share their experiences and successful initiatives in this field. In 2024, the most important topics discussed during the conference were:

- media literacy in the context of the European Parliament elections, including a reminder of the essence of the Code of Practice on Disinformation¹²⁸ and the guidelines for very large platforms and search engines on reducing systemic risks to electoral processes;¹²⁹ information on projects targeting young people, especially those who were voting for the first time; examples of the Belgian ‘Idoubt’ campaign¹³⁰ and a project carried out in cooperation with the public broadcaster VRT – EDUbox were discussed; experiences from a project on disinformation – ‘Medievetna seniorer’¹³¹ dedicated to Swedish seniors; activities carried out by the European Digital Media Observatory (EDMO) and its regional centres (NORDIS, IDMO, BROD) were discussed;
- activities to combat disinformation on the TikTok (Think Twice project),¹³² Meta and iGoogle platforms;
- the use of artificial intelligence in media education, i.e. discussion of projects (Titan,¹³³ TADAMEDUCATION¹³⁴) in the field of artificial intelligence, supporting the development of critical thinking skills and tools for auditing and detecting violations, as well as providing information to support the development and enforcement of regulatory policies;
- information on current work related to the AI Act;
- discussion of the publication (*Synthetic Media Exposed: A Comprehensive Guide to AI Disinformation Detection*),¹³⁵ which is a comprehensive guide to AI for detecting disinformation and recognising AI-generated content;
- child safety on the Internet, including the sharing of experiences from projects dedicated to this issue (Better Internet for Kids)¹³⁶;
- discussion of research results on: social skills for identifying false and misleading content on the Internet (OECD Truth Quest)¹³⁷, threats to democracy (EuroBarometer. European Elections) and IPSOS¹³⁸ on artificial intelligence.
- information on funding opportunities for media literacy projects under the Creative Europe programme.

¹²⁸ See: <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>

¹²⁹ See: <https://disinfocode.eu/>

¹³⁰ See: <https://idoubt.eu/support-the-campaign/>

¹³¹ See: <https://filmpedagogerna.se/utbildning/medievetna-seniorer/>

¹³² See: <https://www.dpa.com/en/think-twice>

¹³³ See: <https://www.titanthinking.eu/criticalthinking>

¹³⁴ See: <https://tadam.education/>

¹³⁵ See: <https://democracyreporting.s3.eu-central-1.amazonaws.com/images/6528fb3c06eb8.pdf>

¹³⁶ See: <https://better-internet-for-kids.europa.eu>

¹³⁷ See: https://www.oecd.org/en/publications/the-oecd-truth-quest-survey_92a94c0f-en.html

¹³⁸ See: <https://www.ipsos.com/en-nz/global-views-ai-and-disinformation>

16.3. EU Code of Practice on Disinformation

In connection with the work of the European Regulators Group for Audiovisual Media Services (ERGA), the National Broadcasting Council (KRRiT) is gathering knowledge on combating disinformation at the EU level. As part of the strengthened EU Code of Practice on Disinformation, the signatories to the Code, including the largest global social media platforms, have adopted more effective protection of users against election disinformation as one of their most important commitments. These measures include removing false election content, limiting its reach, labelling disinformation and promoting reliable information about the electoral process.

The signatories are also required to report their actions in detail, which allows for an assessment of the effectiveness of the measures taken. In September 2024, major online platforms, including Google, Meta, Microsoft and TikTok, published their fourth set of reports in the Transparency Centre, documenting their actions to counter disinformation, particularly in the context of the European elections. They highlighted the effectiveness of the rapid response system, which was to be tested during the European Parliament elections, and the cooperation between platforms and civil society organisations in protecting the integrity of elections.

The monitoring of the implementation of the Code signatories' commitments is carried out by ERGA, which analyses the reports provided by the platforms and cooperates with the European Commission to identify good practices and areas for improvement. The aim of these activities is to ensure transparency and limit the impact of disinformation on, among other things, electoral processes in EU countries.

In November 2024, ERGA adopted an internal report and a public Statement¹³⁹ on progress and challenges related to the Code of Practice on Disinformation. In it, ERGA highlighted key areas where platform reporting remains insufficient. The information provided by platforms is still incomplete, particularly in areas such as political advertising, access to data for researchers, support for fact-checking and media literacy initiatives, and the lack of reporting for all European Economic Area countries by some very large online platforms (VLOPs). These gaps in platform reporting highlight the need to keep up the pressure on platforms to stick to their commitments. ERGA also points out that platforms need to invest more resources at the national level to better fulfil their code commitments. This includes increased support for fact-checking organisations and media literacy initiatives.

In 2024, the European Commission continued its work on converting the Code into a code compliant with the Digital Services Act (DSA), highlighting the challenges of auditing platforms' activities.

¹³⁹ See: https://erga-online.eu/wp-content/uploads/2024/12/ERGA-SG3-Statement-CoP_final.pdf

The EC and ERGA campaign to support citizens in countering disinformation ahead of the European Parliament elections

The campaign, prepared by the European Commission's Directorate-General for Communication in cooperation with ERGA, covered 17 countries and reached an estimated 330 million people, half of the EU population. The spot, available in 24 national languages, had 7 million views on YouTube and began airing on 8 May, one month before the European elections, with an intensification in the week before the elections until the start of the election silence period in successive countries. The campaign aimed to raise awareness of the risks of disinformation in the context of the European elections, including how to recognise false content, the need to verify sources of information and the responsible use of social media. The campaign also sought to show how media literacy can be used effectively to support citizens in the fight against disinformation through various distribution channels: traditional media (the spot was broadcast by 53 radio and television stations), social media, websites of regulatory authorities and platforms of signatories to the Code of Practice on Disinformation. According to the EC and ERGA, the campaign was a great success. It may be continued, with adaptation of the content (universalisation or adaptation to national election calendars) and a second wave of distribution in the countries concerned.

However, the majority of the members of the National Broadcasting Council did not share the positive assessment of the above-mentioned spot with regard to the way it was produced and the Polish language version obtained. The National Broadcasting Council therefore did not agree to participate in its promotion.

16.4. The Council of Europe

The European Audiovisual Observatory (EAO)

Operating for over 30 years, the European Audiovisual Observatory specialises in collecting, aggregating, analysing and publishing data and information on markets, legislation and public policies in the television, VoD, video and film sectors. The information obtained in this way is used to feed publicly accessible databases and is published on the Observatory's website in the form of reports.

The EAO's members are public institutions from 41 countries (mainly national audiovisual regulatory authorities, ministries of culture or national institutes responsible for cinematography and/or audiovisual matters) and the European Union, represented by the European Commission. Poland is represented in the EAO by the National Broadcasting Council (KRRiT).

The EAO maintains the following publicly accessible databases:

- the latest database, called OPUS (opus.obs.coe.int) – an overview of how EU Member States and Iceland, Liechtenstein, Norway, Switzerland and the United Kingdom have

transposed the provisions of the Audiovisual Media Services Directive on the promotion of European works, including national works and independent productions in linear and non-linear services (Articles 13(1), (2) and (6) and Articles 16 and 17 of the Directive), with the possibility of comparing the amounts in this regard;

- AVMSD (avmsd.obs.coe.int) – list of provisions transposing the Audiovisual Media Services Directive into the national legislation of EU Member States;
- MAVISE (mavise.obs.coe.int) – list of European television programmes, VoD services and, in part, video-sharing platforms, indicating the jurisdiction within the meaning of the Audiovisual Media Services Directive;
- LUMIERE (lumiere.obs.coe.int) – list of films authorised for screening in European cinemas;
- LUMIERE VoD (lumierevod.obs.coe.int) – list of European works (films and television programmes) feeding into VoD catalogues in Europe;
- IRIS Newsletter and IRIS MERLIN (merlin.obs.coe.int) – a collection of articles on European and national law and case law in the field of audiovisual media.

In 2024, the Observatory (EAO) produced several reports, including on:

- the European Media Freedom Act (EMFA);
- the protection of minors online (AVMSDigest);
- legal challenges and market dynamics in the video game sector;
- artificial intelligence and the audiovisual sector – an overview of the current legal environment;
- audiovisual media services in Europe (2024 edition);
- media literacy and user empowerment.

A representative of the National Broadcasting Council is a member of the EAO Executive Committee. In 2024, the first meeting of this Committee took place in Georgia, as the country holding the presidency of the Observatory (EAO) for that year, at the invitation of the integrated regulatory body ComCom (Commission for Communications – regulator for audiovisual affairs, electronic communications and consumer rights protection). At the conference opening the Committee meeting, entitled ‘Market competitiveness – implications for market players and regulators in small countries’, one of the panellists was a representative of the National Broadcasting Council, who provided basic information on the market regulated by the National Broadcasting Council and the scope of competence of the national audiovisual regulator, and, based on the statement made by the Chairman of the National Broadcasting Council during the EPRA meeting in Rotterdam, he reported on the situation related to the legal chaos in the public media in Poland.

In 2024, the KRRiT, as Poland's representative in the EAO, together with other members of the Observatory, undertook to cover a proportionate share of Ukraine's membership fee for 2025-2026.

16.5. Bilateral contacts of the National Broadcasting Council with other regulatory bodies in the media sector

On 10 September 2024, the Chairman of the KRRiT met with the Chairperson of the Albanian regulatory authority, the Audiovisual Media Authority (AMA). The Chair of the AMA expressed her appreciation for the new opportunities for cooperation that have opened up between the two regulators, Albanian and Polish, pointing out that *'this is important because I believe that this is the only way we can succeed in our work, by sharing our ideas and plans to meet the challenges facing the authorities we lead.'*

The AMA Chair gave a brief overview of the work of the Albanian regulator and its achievements to date, such as the approval of legal changes and alignment with EU Directive 2018/1808 (the revised Audiovisual Media Services Directive), as well as further proposed changes which provide for the inclusion of audience measurement concepts in legislation, the fight against broadcasting rights piracy and continued cooperation with international partners in the media sector to improve the quality of journalism in audiovisual and other media.

The AMA Chair also emphasised that audience measurement remains a current and important objective of the AMA's work, which is necessary for the further regulation of the audiovisual market. Similarly, the fight against piracy, a phenomenon that has now spread to the Internet, is a priority. *'The AMA will continue to strengthen and develop its established cooperation with various partners in the media sector to achieve common goals in the fight against hate speech and disinformation.'*

From 17 to 25 September 2024, a delegation of the National Broadcasting Council, led by its chairman, went on an official visit to the Baltic countries of Lithuania, Latvia and Estonia.

The main purpose of the visit was to meet with audiovisual regulators from these countries in order to continue and strengthen cooperation under the Warsaw Declaration signed on 4 October 2023. The following topics were discussed during the meetings: the inclusion of national languages in the development of global artificial intelligence, the situation in the media sector in individual countries, European legislation, Russian disinformation and propaganda in the media, sanctions against Russian media, and further actions within the framework of international cooperation. The KRRiT delegation in Vilnius met with Polish journalists living in Lithuania and held a meeting with the Culture Committee of the Lithuanian Seimas. During the visit of the Chairman of the National Broadcasting Council in Riga, a ceremony was held to award the Bene Merito distinction to the Chairman of the National Electronic Media Council (NEPLP), Mr Ivars Āboliņš. Thanks to his commitment, Polish-Latvian cooperation in the public media sector has developed, the best example of which is the decision of March 2023 to include tvp.info, TVP World, TVP Wilno and Bielsat in the list of audiovisual programmes that can be rebroadcast in the Republic of Latvia. The award was presented by *chargé d'affaires* Łukasz Cudny. The Chairman of the National Broadcasting Council met with Archbishop Zbigniew Stankiewicz, Metropolitan of Riga and Primate of Latvia. The National Broadcasting Council delegation also visited historical memorial sites commemorating Poles murdered in the East.

The KRRiT maintains regular working contacts with its foreign partners, the signatories of the Warsaw Declaration (Declaration on Cooperation and Mutual Support in Combating Disinformation, signed on 4 October 2023 in Warsaw during the international conference ‘Stop Disinformation and Russian Propaganda’).

17. EU legislation on media issues and the expected role of the National Broadcasting Council in these areas

17.1. Changes in EU law in areas related to the public media - EU Digital Services Act (DSA)

The EU Digital Services Act (DSA)¹⁴⁰ sets out a legal framework for the activities of online platforms aimed at ensuring a safe, reliable and friendly environment for the exchange of information, views and opinions, an environment that allows for artistic expression, but also a safe place to purchase goods and services online. The DSA also sets out mechanisms for enforcing the obligations arising from this regulation. The Digital Services Act should be fully applicable in EU Member States from 17 February 2024.

Alongside the EU Audiovisual Media Services Directive (AVMSD), which regulates content,¹⁴¹ the DSA – as a complementary regulation on due diligence by digital service intermediaries – is intended to be a key regulation ensuring that individuals are protected in their exercise of the right to freedom of expression and the right to information, ensuring a friendly environment for all social groups to exchange views, exercise their right to information and form opinions, as well as strengthening safeguards protecting freedom of expression in relations between users and platform providers. Platforms must report every instance of content removal, justify it, and users can challenge the platform's moderation decision through an out-of-court dispute resolution mechanism.

In 2024, the European Commission adopted two implementing acts to facilitate the application of the Digital Services Act (DSA):

- Commission Implementing Regulation (EU) 2024/2835 of 4 November 2024 establishing templates for the fulfilment of transparency reporting obligations by intermediary service providers and online platform providers under Regulation (EU) 2022/2065 of the European Parliament and of the Council;
- Commission Implementing Regulation (EU) 2024/607 of 15 February 2024 on practical and operational arrangements for the functioning of the information exchange system

¹⁴⁰ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act).

¹⁴¹ Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain laws, regulations and administrative provisions of the Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of market developments.

pursuant to Regulation (EU) 2022/2065 of the European Parliament and of the Council (Digital Services Act).

The Commission also consulted on a draft delegated regulation supplementing the DSA by laying down technical conditions and procedures for the provision of data by very large online platform operators and very large search engines pursuant to Article 40 of that act.

Furthermore, on 20 January 2025, following a positive assessment by the EC and the European Digital Services Board, the *‘Code of Practice on countering illegal hate speech online +’* was incorporated into the regulatory framework of the DSA. These bodies considered compliance with the code by very large online platforms and search engines to be a risk-reducing measure that would facilitate the application and enforcement of the DSA.

Very large online platforms and search engines also published their first risk assessment and audit reports under the DSA.

Recognising the importance of complementary and consistent application of the DSA and the DAUM, the European Regulators

Group for Audiovisual Media Services (ERGA) has undertaken analytical work to develop guidance for national regulators to facilitate the consistent application of procedures under the DSA, the DAUM and the EMFA, resulting in the adoption in 2024 of an internal ERGA report entitled *‘Implementation and cross-border enforcement of the European regulatory framework for digital and audiovisual media services’*.

On 15 October 2024, the European Commission published a call for tenders for the development of technical specifications for verifying the age of users of digital online services, while ensuring privacy protection. This technical solution should be an important step towards better protection of children from content that is harmful to them.

European Media Freedom Act (EMFA)

The European Media Freedom Act (EMFA)¹⁴² was adopted on 11 April 2024, and the first part of its provisions entered into force in 2024, with the main part of its provisions to apply from 2025.¹⁴³

The aim of the EMFA is to ensure that public and private media function better in the EU internal market, taking into account the challenges of the digital transformation of the media landscape. One of the key aspects of the EMFA is also to deepen cooperation between media regulators from EU Member States in bilateral and multilateral relations (within the framework of so-called organised cooperation and within the procedure for implementing requests for the enforcement

¹⁴² Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 laying down a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act).

¹⁴³ Article 3 - from 8 November 2024; Article 4(1) and (2), Article 6(3) and Articles 7 to 13 and 28 - from 8 February 2025; Articles 14 to 17 shall apply from 8 May 2025; Article 20 – from 8 May 2027; all other provisions – from 8 August 2025.

of obligations imposed on video-sharing platform providers under foreign jurisdiction), as well as with the European Commission.¹⁴⁴

In 2024, ERGA began preparatory work for the implementation of EMFA, including the drafting of a preliminary version of the ERUM mission statement, an outline of a multi-annual strategy and a preliminary concept for ERUM's rules of procedure.

Regulation on Artificial Intelligence (AI Act)

The Regulation on Artificial Intelligence (AI Act)¹⁴⁵ was adopted on 13 June 2024. It specifies in particular:

- harmonised rules on the placing on the market, putting into service and use of artificial intelligence systems;
- prohibitions on certain AI practices;
- requirements for high-risk AI systems and obligations for operators of such systems;
- provisions on the transparency of AI systems;
- provisions on the placing on the market of general-purpose AI models;
- provisions on the monitoring of the placing on the market, market surveillance, governance and enforcement.

The AI Act is to apply from 2 August 2026.¹⁴⁶

The AI Act aims to enable the fuller realisation of freedom of expression, the right to information and freedom of opinion. It provides measures to combat disinformation, discrimination in the information sphere and hate speech in the context of the functioning of GPAI systems. It also aims to increase the protection of particularly vulnerable groups, including minors, from harmful

¹⁴⁴ See: Chapter 16

¹⁴⁵ Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2 144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Act on Artificial Intelligence).

¹⁴⁶ Chapters I and II (prohibitions on certain artificial intelligence systems and requirements for AI proficiency) are to apply from 2 February 2025; by 2 May 2025 the GPAI Codes of Conduct (general purpose AI models) shall be prepared; Chapter III, Section 4 (notified bodies), Chapter V (GPAI models), Chapter VII (governance, including the AI Agency and the European AI Council) and Chapter XII (deadline by which Member States must establish rules on penalties and notify them to the Commission and ensure their proper implementation) shall apply from 1 January 2026. Artificial Intelligence) and Chapter XII (deadline by which Member States must establish provisions on penalties and fines, notify them to the Commission and ensure their proper implementation) and Article 78 (confidentiality) are to apply from 2 August 2025, with the exception of Article 101 (financial penalties for GPAI providers); by 2 August 2025, Member States are to notify the EC of the details of the notified bodies and market surveillance authorities and of the tasks of those bodies. Also by 2 August 2025, EU countries have to make public information on how to contact the relevant authorities and single points of contact. EU countries have to designate a market surveillance authority to act as a single point of contact for the purposes of the Regulation; by 2 August 2025, if the code of conduct has not been finalised by that date, the EC may establish common rules for the performance of the duties provided for in Articles 53 and 55 of the AI Act - obligations of suppliers of GPAI models and GPAI models with systemic risk - by means of implementing acts; suppliers of GPAI models placed on the market before 2 August 2025 shall comply with the requirements of the AI Act by 2 August 2027; Article 6 (1) (classification of high-risk AI systems) and the corresponding obligations laid down in the AI Act shall apply from 2 August 2027.

content, inter alia through transparency and accountability obligations in the training and testing of GPAI models and GPAI models with systemic risk. GPAI model providers are required, inter alia, to publish a summary of the content used for training, and GPAI model providers which pose a systemic risk must also conduct adversarial testing of the model to identify and mitigate systemic risk, assess and mitigate any systemic risk that may arise from the development or use of GPAI models, record and report serious incidents, and ensure cybersecurity protection.

From the perspective of protecting freedom of expression, the provisions of the AI Act relating to GPAIs are particularly relevant, given the use of GPAI systems as a source of information and their growing use by media service providers (from robot journalism, fact-checking, to compiling broadcasts and other programme components) as well as the use of these tools by some users in public debate. AI tools are also used by European media services regulators, including in the areas of automatic detection of infringements of legal obligations.

17.2. The position of the National Broadcasting Council (KRRiT) on the Polish government's actions regarding the implementation of the DSA, EMFA and AI Act in Poland

The Digital Services Act (DSA)

The Digital Services Act should have been fully implemented in all EU Member States by 17 February 2024. Most Member States have met this deadline. Poland is not among them, despite four draft laws implementing the DSA provisions presented so far by the Ministry of Digital Affairs.¹⁴⁷ The European Commission has once again spoken out on this issue, sending a so-called reasoned opinion to Poland on 16 December 2024, which is a formal request to ensure compliance with EU law by implementing the DSA within two months. In its request, the EC points out the need to appoint a national coordinator for digital services, grant them the necessary powers and implement provisions on penalties for breaches of the *due diligence* requirements set out in the DSA. This is the second stage of the infringement procedure, following the Commission's request for the removal of the infringements on 24 April 2024. The next stage may be to refer the case against Poland to the Court of Justice of the European Union.

None of the DSA implementation bills submitted by the Ministry of Digital Affairs, considered both before and after the current government came to power, despite repeated letters, requests, communications and positions of the National Broadcasting Council, take into account the active role of the National Broadcasting Council in its application as one of the competent authorities within the meaning of the DSA. Only in the first draft implementation bill (January

¹⁴⁷ According to information from January 2025, the current drafts of the act amending the act on the provision of electronic services and certain other acts, which aim to implement the DSA provisions in Poland, are as follows: the draft of 10 January 2023; the draft of 14 March 2024; the draft of 19 July 2024; the draft of 13 December 2024. This draft is currently being worked on by the Standing Committee of the Council of Ministers: <https://legislacja.gov.pl/projekt/12383101/katalog/13045632#13045632>

2023) was the KRRiT proposed as one of the competent authorities, but only in relation to matters concerning video-sharing platforms, i.e. providers already subject to the KRRiT's authority under the Broadcasting Act. The next three draft implementing acts for the DSA omitted even this greatly reduced aspect.

Between January 2023 and January 2025, the KRRiT issued six opinions, as well as a statement by the KRRiT Chair and a press release, which addressed the need for urgent implementation of the DSA in Poland, the proposed role of the KRRiT in the application of this regulation in Poland, and the risks and threats associated with the changes that have been made in the latest draft implementing act (draft of December 2024) compared to the previous version of the draft (draft of 19 July 2024). The latest changes include, among other things, a significant extension of the powers of the President of the UKE (in the previous version of the draft, these powers were assigned to the court) and a significant weakening of procedural safeguards. In the opinion of the KRRiT, this entails a high risk of being used to remove critical statements on the Internet, which violates the fundamental right to freedom of expression.

All positions of the National Broadcasting Council, the statement of the Chairman of the National Broadcasting Council and the communiqué are available on the website of the National Broadcasting Council.¹⁴⁸ For this reason, a brief summary of the most important demands of the National Broadcasting Council regarding the implementation of the DSA in Poland is presented below.

Since the beginning of 2024, the National Broadcasting Council, has expressed concern about the government's delay in adopting regulations for the application of the DSA and has indicated that urgent action should be taken to ensure the effective application of the DSA in Poland, emphasising that the National Broadcasting Council should be the competent authority in the area of protecting freedom of expression and the right to information of users of online content-sharing platforms. At the same time, the KRRiT indicated that matters relating to unfair commercial practices and distance contracts with consumers, where the President of the Office of Competition and Consumer Protection (UOKiK) would be competent, as well as matters relating to the protection of personal data in the context of profiling, where the President of the

¹⁴⁸ Position of the National Broadcasting Council of 1 February 2023 on the draft act amending the act on the provision of electronic services and certain other acts (draft of 10 January 2023), implementing the Digital Services Act; Position of the National Broadcasting Council of 10 January 2024 in connection with the implementation of the Digital Services Act (DSA) – necessary legislative changes within the remit of the National Broadcasting Council; Position of the National Broadcasting Council of 15 February 2024 on the urgent implementation of the Digital Services Act (DSA) and taking into account the active role of the National Broadcasting Council in supervising the application of its provisions in Poland; Position of the National Broadcasting Council of 17 September 2024 on the current Polish government's disregard for the constitutional and statutory role of the National Broadcasting Council as an independent regulator of audiovisual media; Position of the National Broadcasting Council of 27 December 2024 on the need for urgent implementation of the Digital Services Act (DSA) and taking into account the active role of the National Broadcasting Council in supervising its application in Poland; Statement by the Chairman of the National Broadcasting Council of 27 December 2024 on the Polish Government's delay in implementing the DSA in Poland and the omission of the KRRiT's participation in this implementation; KRRiT position of 13 January 2025 on the draft law implementing the EU Digital Services Act (DSA), submitted by the Ministry of Digital Affairs (plan to introduce Internet censorship); Risks and threats related to the Polish government's implementation of the Digital Services Act (DSA) into Polish law (statement of 15 January 2025).

Personal Data Protection Office (UODO) would be competent, should be excluded from its supervision. Such a scope of competence of the National Broadcasting Council with regard to the application of the DSA in Poland would constitute a natural extension of the current scope of the statutory duties of the National Broadcasting Council and would ensure the impact of a single regulator with a consistent approach to the same or similar phenomena. The National Council's achievements, knowledge and experience in the field of user protection are of significant importance for ensuring a secure, open and pluralistic public debate in the online environment, access to information, freedom of expression and the right to freely form opinions in the environment of online platforms.

The National Council also pointed out that the draft regulations should establish procedures for cooperation and consultation between the competent authorities and the Digital Services Coordinator, respecting their existing achievements and knowledge, and enable the creation of a forum for the development of Poland's position to be presented within the European Digital Services Board.

The National Broadcasting Council also proposed that, in order to increase the legal transparency of the functioning of intermediary service providers established in the territory of the Republic of Poland, as well as to protect the interests of Polish citizens, public order and public health, the concept of illegal content under national law should be clarified as much as possible.

Despite numerous letters, requests and statements by the National Broadcasting Council during the drafting of the provisions implementing the DSA, the Polish government has consistently ignored the role that should be granted to the National Broadcasting Council as one of the competent authorities within the meaning of the DSA. In doing so, the Polish government undermines the constitutional role of an independent, pluralistic regulatory body competent in matters of freedom of expression and the right to information, pointing directly to the exclusion of the current composition of the KRRiT for political rather than substantive reasons.¹⁴⁹

The National Broadcasting Council strongly protests against the announcements of restrictions on freedom of speech in Poland. Such actions constitute a gross violation of the constitutional guarantees of freedom of speech enshrined in Article 54 of the Constitution of the Republic of Poland, which unequivocally prohibits censorship. The KRRiT strongly emphasises that the introduction of censorship mechanisms on the Internet, in particular without judicial oversight and procedural guarantees, is unacceptable in a democratic state governed by the rule of law. Such solutions will lead to arbitrary decisions and restrictions on the right to information and freedom of expression, which are the basis for the functioning of free media and civil society. The National Council declares that if such provisions are adopted, it will take all possible legal steps to protect the constitutional rights of citizens and hold those responsible for introducing censorship accountable.

¹⁴⁹ See the draft law implementing the DSA (draft of 13 December 2024), justification, p. 63: 'Furthermore, given the competences of the National Broadcasting Council in the field of video-sharing platforms, it could, in the future, after the necessary reforms to guarantee its independence, also be recognised as the competent authority within the meaning of Article 49 of the Regulation.'

European Media Freedom Act (EMFA)

In a letter dated 13 September 2024 addressed to the Minister of Culture and National Heritage, the Chairman of the National Broadcasting Council presented his position on the concept of implementing into Polish law the regulations resulting from Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act).¹⁵⁰

The Chairman of the National Broadcasting Council pointed out that the regulation is of a non-treaty nature and that the European Union has no mandate to shape the media system, as he had repeatedly emphasised at national and international forums. Furthermore, he pointed out that the adoption of provisions implementing the EU regulation must involve a key role for the National Broadcasting Council as an independent media market regulator, including an appropriate extension of its powers and equipping it with appropriate regulatory, administrative and financial tools. He also pointed out that the concept presented, on the one hand, contains proposals that go beyond the scope of the implementation of the Regulation and, on the other hand, omits areas that require national implementation. In the opinion of the National Council, the provisions of Articles 14-15, 17, 18(1), (2) and (8) and Article 26 of the Regulation, which require implementation into the national legal system, have been unjustifiably excluded from the scope of the proposed guidelines. With regard to the individual proposals, the Chairman of the National Broadcasting Council presented the following position:

- The proposal to restore the nine-member composition of the National Broadcasting Council (KRRiT) is not justified by the provisions of the EMFA, and the arguments used by the Ministry of Culture and National Heritage regarding the competences of the KRRiT are not only irrelevant to reality but will also result in unjustified expenditure of public funds.
- The proposal to reinstate the rotational method of appointing KRRiT members goes beyond the provisions of the EMFA.
- It is unacceptable that, in a free society where freedom of speech is a fundamental principle of a democratic state governed by the rule of law, the right to own and use the media should be restricted, thereby preventing local government bodies, which operate independently of government structures, from exercising this fundamental right. which operate independently of government structures – the proposal to completely ban local government units and their subordinate entities from engaging in media activities is an unprecedented example of the radical influence of government administration on the independent functioning of local government, undermining its autonomy and statutory powers;
- The proposal to consider the statutory separation of the function of editor-in-chief from the management board of a public radio and television company is, in principle, in line with the objectives set out in the EMFA;

¹⁵⁰ See: <https://www.gov.pl/web/kultura/zalozenia-do-ustawy-medialnej>

- The proposal to impose on the National Broadcasting Council (KRRiT) an obligation to conduct public consultations before adopting information on the implementation of the duty cards for a given period does not result from the requirements of the EMFA, and the proposed change seems unjustified.
- The criteria proposed for candidates for supervisory boards of public media are insufficient in relation to the intended objective.
- The proposal to grant the minister or another entity representing or forming part of the executive authority the power to appoint members of the supervisory boards of public radio and television companies does not guarantee the independence of public media from government and political interests;
- the proposal to change the role, size, method of appointment and selection criteria for programme councils in public media goes beyond the scope of the EMFA;
- the proposals concerning the appointment of members of the management boards of public media require further analysis;
- the proposals to modify the tasks of TVP in the area of regional activities do not deserve support and should be rejected;
- given the actual inefficiency of the current licence fee system, it is reasonable to seek an optimal model for financing public media, and the justification for changing the method of financing public media is in line with the objectives set out in the EMFA;
- under the current legal framework, the National Broadcasting Council already has the appropriate tools to assess the activities of public media;
- proposals to limit the presence of public media in the advertising market and increase the public service obligations of public broadcasters require detailed economic analysis;
- it seems questionable to distinguish between the obligations of press publishers and other media service providers with regard to the disclosure of their ownership and shareholding structure;
- it is reasonable to extend the scope of entities to whom the National Broadcasting Council will address requests in connection with proceedings concerning the assessment of concentration in the media market, entities operating audience measurement systems in terms of the compliance of their systems with the standards set out in EMFA, and public entities in terms of the application of provisions on the allocation of public funds for state advertising;
- the task of monitoring and analysing the market for devices and interfaces enabling control of access to and use of media services consisting in the provision of broadcasts should, due to its exclusively technical nature, be entrusted to the UKE rather than the KRRiT;
- the proposal concerning the deadlines for the adoption of resolutions by the KRRiT on licensing matters requires further clarification;
- the proposal to consider reducing the licence for terrestrial broadcasting seems reasonable;
- the proposals concerning individual concentration control are, in principle, in line with the EMFA;
- the proposal to carry out periodic monitoring of the media market in terms of pluralism of supply and editorial independence of media entities requires further clarification;
- the extension of the tasks of the National Broadcasting Council (KRRiT) in the field of promoting self-regulation and co-regulation should be preceded by a statutory definition of these concepts;

- assigning the KRRiT responsibilities related to the regulation of the allocation of state advertising is consistent with the EMFA.

At the same time, the Chairman of the National Broadcasting Council emphasised that national regulations are of key importance for the implementation of the media market regulation system referred to in the Regulation, and that the position of the National Council on specific areas will be developed or modified as the procedure progresses. The Chairman of the National Broadcasting Council also declared his full readiness to cooperate with the Minister of Culture and National Heritage and with the national legislator in order to develop the best possible legislative and regulatory solutions.

Artificial Intelligence Act (AI Act)

In a letter dated 14 November 2024 addressed to the Minister of Digital Affairs, the Chairman of the National Broadcasting Council commented on the draft law on artificial intelligence systems.¹⁵¹

The Chairman of the National Broadcasting Council upheld the position already expressed in a letter dated 18 April 2024 in response to the pre-consultations, emphasising that the market surveillance functions should be performed by the existing authorities. This is based on the experience, qualified staff and substantive knowledge of market issues already possessed by the existing entities. The economic aspect is also important: extending the competences of existing institutions with new tasks resulting from the Act on Artificial Intelligence would significantly reduce expenditure, unlike the establishment and creation of new structures. Furthermore, the subject matter covered by the EU regulation is already being implemented by these entities, as exemplified by the competences of the National Council in relation to the broadly understood protection of minors or issues related to advertising. However, referring to the model outlined in the draft law, the Chairman of the National Broadcasting Council pointed out that the inclusion of the National Broadcasting Council in the group of supervisory authorities with which the Commission for the Development and Safety of Artificial Intelligence will cooperate is essential to establish a governance framework that will enable the coordination and proper application of the EU Act on Artificial Intelligence at national level. Furthermore, the National Council, as a practitioner in the field of electronic media supervision, should be established as the body responsible for the control and regulation of content produced by artificial intelligence systems in the field of audiovisual services, and consideration should be given to extending the statutory powers of the National Council to include tools to protect the image of public figures and combat

¹⁵¹ A draft bill on artificial intelligence, implementing the AI Act into Polish law, was presented in October 2024 by the Minister of Digital Affairs: <https://legislacja.gov.pl/projekt/12390551> The draft act defines the organisation and manner of national supervision of the market for artificial intelligence systems and general-purpose artificial intelligence models and is intended to implement Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 on the establishment of harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013 and (EU) No 168/2013. on rules in the field of artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (the Act on Artificial Intelligence), which establishes a regulatory framework for the development, deployment and use of artificial intelligence systems within the European Union's single market.

phenomena such as deep fakes in electronic media or the use of artificial intelligence systems to manipulate people's behaviour through the media or online platforms.

The proposed solution, according to which one of the members of the Commission for the Development and Security of Artificial Intelligence will be a representative of the National Broadcasting Council, was positively assessed. In the context of service security, it is important to emphasise the need for the participation of all digital market regulators responsible for supervising automated data processing systems used in digital services, including the media services. It is also right to assume that, in exercising its supervision over artificial intelligence systems and performing its tasks, the Commission should be an independent body exercising market supervision autonomously, and that all members of the Commission should be equal, with the right to participate in Commission meetings, obtain information, vote and take decisions. The Chairman of the National Broadcasting Council also pointed out that the draft bill requires thorough legislative revision.

18. Poland's membership in the European Union, the Council of Europe and the OSCE

18.1. EC Report on the Rule of Law in 2024

The National Broadcasting Council unequivocally criticised the European Commission's 2024 report on the rule of law in Poland with regard to media pluralism and media freedom, as expressed in a letter dated 29 July 2024 by the Chairman of the National Broadcasting Council to the Vice-President of the European Commission, as well as in a letter to the Chancellery of the Prime Minister dated 12 August 2024. In the opinion of the National Broadcasting Council, the European Commission's assessment of the rule of law in Poland and in the Polish public media is not based on facts.

The National Council assessed the allegations made in the Report against the regulatory authority as clearly biased and unfounded. Under no circumstances can the insinuations that there are concerns about the regulatory impartiality of the National Council and that there is a high risk to the independence and effectiveness of the media regulatory authority be accepted. It should be clearly emphasised that the National Council acts on the basis of and within the limits of the law, and its decisions are subject to judicial review. The process of conducting administrative proceedings, issuing decisions, including licences, and examining complaints and requests is transparent and clearly defined by law. The National Council is fully independent of external entities, including the government.

The current situation in the Polish public media has been presented in the EC report in a completely biased and distorted manner, and the omission of the position presented by the Chairman of the National Broadcasting Council during the meeting with EC representatives preceding the report should be considered a deliberate action on the part of the Commission. This is an incomprehensible disregard for a constitutional body exercising supervision over public media companies, in accordance with the law.

18.2. The OSCE/ODIHR mission and other bodies

In 2024, neither of the two planned meetings between the OSCE Office for Democratic Institutions and Human Rights (ODIHR) delegation and the Chairman of the National Broadcasting Council and representatives of the National Broadcasting Council took place. The first meeting, requested by the ODIHR mission, was to focus mainly on the role of public media in the European election campaign. However, it was cancelled by the initiating party on the eve of the agreed date.

The second meeting, initially planned at the request of the ODIHR in September 2024, did not take place due to the lack of final confirmation from the ODIHR mission. The meeting was intended to discuss the recommendations proposed in the ODIHR report following the 2023 parliamentary elections in Poland. The Chairman of the National Broadcasting Council proposed that the meeting also discuss the lack of information in the public media taken over by the current Polish government on the shocking arrest of Father Michał Olszewski. This case was publicised by independent news media but ignored by the public media. For this reason, the position expressed by the ODIHR on this matter was, for the Chairman of the KRRiT, an indicator of the organisation's impartiality in assessing the media situation in Poland.

As regards other bodies, in 2024, in contrast to 2023, neither the Monitoring Committee of the Parliamentary Assembly of the Council of Europe nor the Committee on Culture and Education of the European Parliament held any meetings with representatives of the KRRiT.

19. Numerical data

19.1. Statistical information on the work of the National Broadcasting Council and the Chairman of the National Broadcasting Council

In the reporting year, the National Broadcasting Council:

- held 27 meetings;
- adopted 359 resolutions, most of which concerned decisions on the granting or amendment of licences for the broadcasting of radio and television programmes;
- issued opinions on 15 draft laws relating to various areas of activity in the audiovisual market;

The Chairman of the National Broadcasting Council, after agreeing on the technical conditions with the President of the Office of Electronic Communications, published:

- 16 announcements on the possibility of obtaining or extending a licence for analogue terrestrial radio broadcasting;

- 1 announcement on the possibility of obtaining a licence for the broadcasting of two television programmes over a nationwide multiplex.

The Chairman of the National Broadcasting Council issued:

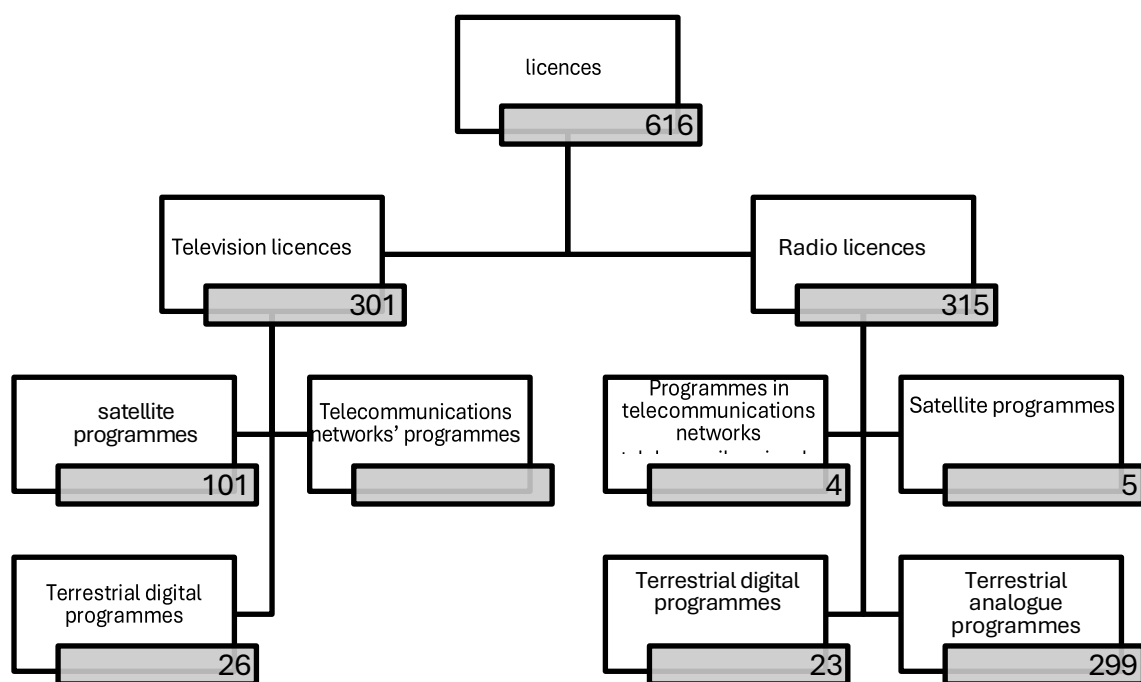
- 4 decisions on the granting of new licences for local radio programmes;
- 3 decisions on the extension of a radio programme licence to include a new frequency;
- 3 decisions on granting a new licence for a television programme in a nationwide multiplex;
- 7 decisions on granting new licences for satellite programmes;
- 11 licences for another period for terrestrial radio programmes;
- 1 licence for another period for terrestrial television programmes;
- 9 licences for the next period for satellite television programmes;
- 16 new licences for the distribution of television programmes in telecommunications networks;
- 12 licences for the next period for the distribution of television programmes in telecommunications networks;
- 16,397 administrative decisions, including 16,088 subscription decisions, 237 licence decisions and 72 decisions imposing financial penalties totalling PLN 2,165,626.45.

19.2. Statistical information on the state of the radio and television broadcasting market

At the end of the reporting period, there were: ¹⁵²

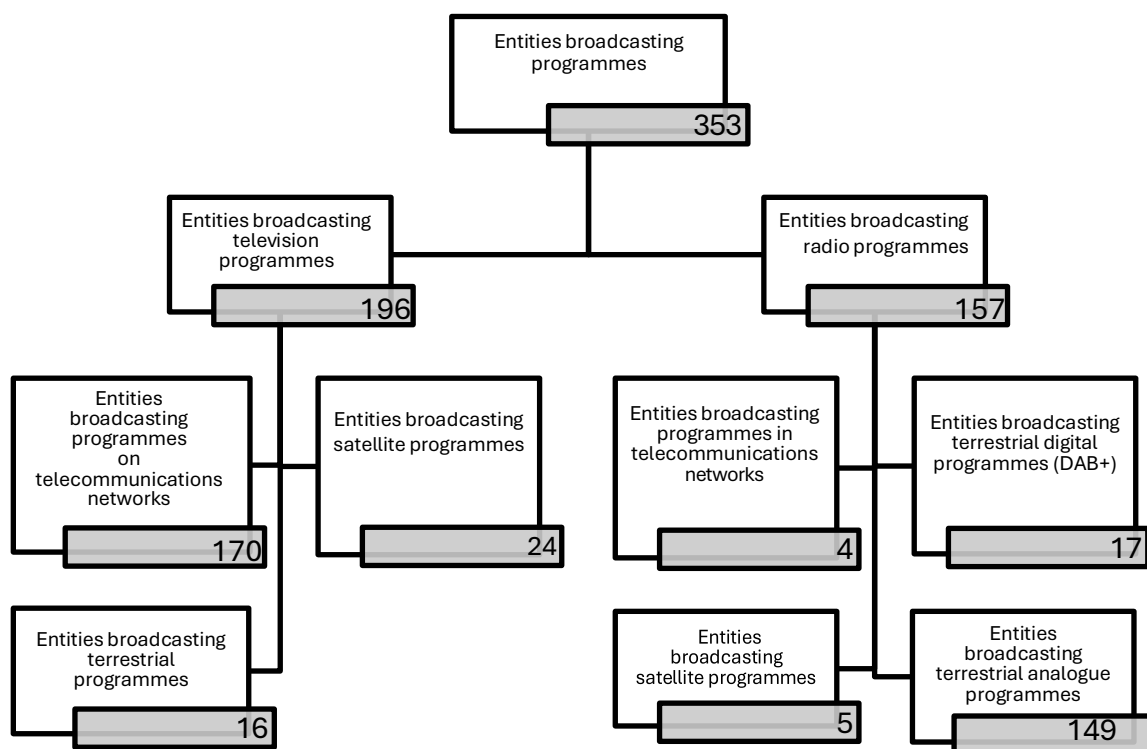
- **315** radio licences, including **5** licences for satellite broadcasting, **4** in telecommunications networks and **23** licences for digital terrestrial broadcasting in DAB+ (**13** of which obtained this right on the basis of licence extensions and **10** on the basis of new licences) and **299** licences for programmes broadcast terrestrially in analogue format;
- **301** television licences, including **26** for terrestrial broadcasting, **101** for satellite broadcasting and **189** for telecommunications networks;
- Licensed radio programmes were broadcast by **157** entities (**149** entities broadcast programmes terrestrially in analogue, **17** entities broadcast terrestrially in digital format, **5** entities broadcast via satellite and **4** entities broadcast via cable networks); licensed television programmes were broadcast by **196** entities (**16** entities broadcast terrestrially, **24** entities broadcast via satellite and **170** entities broadcast via cable networks).

¹⁵² The number of licences and programme distributors is not cumulative, as some broadcasters distribute more than one programme or in more than one manner.



*The number of licences does not add up, as some licences grant the right to broadcast a programme in more than one way.

Source: Office of the National Broadcasting Council



*The number of licences does not add up, as some licences grant the right to broadcast a programme in more than one way.

Source: Office of the National Broadcasting Council

19.3. Statistical information on VoD and VSP services

In the year 2024:

- 265 applications were received for entry in the register of television programmes broadcast exclusively via an ICT system and distributed programmes. On the basis of these and earlier applications, the Chairman of the National Broadcasting Council issued 263 decisions on entry in the register of television programmes broadcast exclusively via an ICT system and distributed programmes, 12 decisions on changes to entries in the operators' register books and 24 decisions on deletion from the register of television programmes broadcast exclusively via an ICT system at the request of the broadcaster;
- 142 applications for entry in the VoD register were received. On the basis of these and earlier applications, the Chairman of the National Broadcasting Council issued 187 decisions on entry in the VoD register. The Chairman of the National Broadcasting Council also initiated 24 administrative proceedings to impose penalties for failure to enter the list of VoD services and issued 7 decisions imposing such penalties due to failure to enter the list;

- 59 on-demand audiovisual media services were removed from the KRRiT Chairman's list (mainly e-learning platforms - 50);
- 40 administrative proceedings were initiated to impose a financial penalty for failure to submit a report within the time limit specified in Article 47j (3) of the Act;
- one application for entry was submitted to the VSP list;
- two VSP services were removed from the list of video-sharing platforms.

19.4. Subscription fee and subscribers in 2024

In 2024, the subscription fee was: ¹⁵³

- for the use of a radio receiver PLN 8.70 per month;
- for the use of a television, radio and television receiver PLN 27.30 per month.

Subscribers in 2024.

According to the records of Poczta Polska (the Polish Post), as of 31 December 2024, there were 4,742,347, ¹⁵⁴ subscribers registered, including 238,105 institutional subscribers. The number of subscribers with registered radio and television receivers decreased. On the other hand, the number of subscribers exempt from subscription fees increased. Detailed information on the number of subscribers is presented in **Attachment No.19.**

Out of 12.5 million households in Poland, ¹⁵⁵ 92.7% have television receivers. ¹⁵⁶ According to a report by *Poczta Polska S.A.* as at 31 December 2024, ¹⁵⁷ the number of households registered as payers of the subscription fee was 4.5 million, which represents only 38.8% of all households with receivers that should be registered.

Of the registered households, 2.6 million subscribers were exempt from paying subscription fees. Information on the number of persons exempt from paying subscription fees in the years 2010–2024 is presented in **Attachment No. 20.**

At the end of 2024, only 0.7 million liable households and institutional subscribers (32.1%) had paid their subscription fees.

¹⁵³ Regulation of the National Broadcasting Council of 10 May 2023 on the amount of subscription fees for the use of radio and television receivers and discounts for their payment in advance for a period longer than one month in 2024 (Journal of Laws 2023, item 943).

¹⁵⁴ Based on monthly statements from Poczta Polska SA (Polish Post) entitled 'Number of radio and television subscribers as of the last day of each month.'

¹⁵⁵ According to data from the Central Statistical Office, based on the 2021 census.

¹⁵⁶ According to data from the founding study of the National Media Institute (*KiM*), 2024.

¹⁵⁷ See the report of *Poczta Polska* (the Polish Post): I.9 Report on the number of radio and television subscribers as of 31 December 2024.

Applications for remission or instalment payment of subscription fee arrears:

- 15,722 applications for remission or instalment payment of arrears were received;
- 17,867 applications from 2019-2024 were processed;
- 16,088 decisions and 1,779 rulings and notifications terminating proceedings on applications were issued.

The KRRiT decisions on remission or instalment plans for subscription fee arrears:

- subscription fee arrears amounting to over PLN 9.6 million were remitted;
- debt in the amount of approximately PLN 3.8 million was spread out into instalments;
- 2,829 decisions were issued refusing to write off or spread out into instalments of subscription arrears totalling over PLN 14.5 million.

Performance of the agreement by *Poczta Polska* (the Polish Post) in 2024

Poczta Polska (the Polish Post) submitted to the National Broadcasting Council (KRRiT), Report No. 158 on the performance of the agreement¹⁵⁸, in which it showed that in 2024 it will have collected a total of PLN 660.2 million gross in subscription and non-subscription revenues, of which:

- subscription fees amounted to PLN 643.2 million;
- interest for late payment amounted to PLN 11.9 million;
- penalties for unregistered receivers amounted to PLN 5.1 million.

According to data provided by *Poczta Polska SA*, at the end of December 2024, subscription arrears for 2019 in the amount of PLN 207.8 million had become time-barred. **Attachment No. 21** presents the subscription and non-subscription revenues collected in 2010-2024.

For performing its statutory duties related to the collection of subscription fees, *Poczta Polska* receives contractual remuneration of 6% of the collected fees and interest for late payment, as well as 50% of the revenue from penalties collected for the use of unregistered radio and television receivers.

In 2024, *Poczta Polska* collected contractual remuneration in the amount of PLN 41.8 million. **Attachment No. 22** presents the amount of commission collected by *Poczta Polska* in 2010-2024.

¹⁵⁸ See the report of *Poczta Polska*: I.9 Report on the number of radio and television subscribers as at 31 December 2024.

In 2024, the Financial Service Centre of *Poczta Polska* sent 118,365¹⁵⁹ reminders to subscribers in arrears concerning their subscription fees. A total of 32,651 subscribers settled their outstanding debts in full or in part, paying PLN 53.6 million. With regard to the remaining subscribers in arrears, *Poczta Polska* initiated administrative proceedings and issued 21,232 executory entitlements.¹⁶⁰ In 2024, 31,608 executory entitlements were collected for a total amount of PLN 42.9 million.

After deducting the commission for the collection of subscription arrears *Poczta Polska*, transferred PLN 90.7 million to the KRRiT bank account at Bank Gospodarstwa Krajowego.

In September 2024, during a crisis situation caused by flooding, the National Broadcasting Council informed *Poczta Polska* of a possible extension of the subscription fee collection process and declared that it would consider all applications from flood victims for the cancellation of subscription fees under Article 10 of the Act of 21 April 2005 on subscription fees.¹⁶¹

The subscription fee amount in 2025

The KRRiT Regulation¹⁶² specifies the subscription fees for 2025 and discounts for advance payment of subscription fees for a period longer than one month, taking into account the projected number of people benefiting from these discounts and the need to cover the costs of fulfilling the mission. In 2025, the fee for the use of a radio receiver remained unchanged at PLN 8.70 per month for the use of a television receiver or a radio and television receiver, and PLN 27.30 per month.

19.5. Balance of public funds at the end of 2024

As at 31 December 2024, the amount of PLN 39.7 million remained in separate bank accounts of the National Broadcasting Council, of which:

¹⁵⁹ Based on quarterly statements of *Poczta Polska*: Statement on the number, amount of enforced liabilities and the amount transferred to the KRRiT account for reminders and enforcement titles.

¹⁶⁰ Based on monthly reports from *Poczta Polska* (Polish Post): *Summary statement of fees collected for the use of radio or television receivers for a given month of 2024, together with partial statements broken down by province.*

¹⁶¹ Appeal by the National Broadcasting Council to the media for caution and accuracy when reporting on the catastrophic flood situation in Poland - National Broadcasting Council - Gov.pl portal

¹⁶² See the Regulation of the National Broadcasting Council of May 13, 2024, on the amount of subscription fees for the use of radio and television receivers and discounts for their payment in advance for a period longer than one month in 2025 (Journal of Laws of 2024, item 756).

- PLN 19.3 million was subscription revenue transferred by *Poczta Polska* (the Polish Post) and short-time overnight interest earned in the period from 11 to 31 December 2023,
- PLN 18.2 million was the surplus of subscription fee revenues and interest over the 2023 forecast,
- PLN 1.3 million was the surplus of subscription fee revenues and interest over the 2024 forecast,
- PLN 0.9 million was interest returned ofrom the court deposits and a returned deposit.¹⁶³

19.6. Information on the amount of budget revenues and expenditures of the National Broadcasting Council and the latest employment figures

Actual budget revenues amounted to PLN 61,296,100. This represented 138.1% of the amount adopted in the budget act for 2024. The revenues were transferred to the current account of the state budget.

The revenues transferred to the state budget included, among others revenues from licence fees (radio, television, cable television networks); extension fees and interest; fees for entry in the register of programmes broadcast exclusively in ICT systems and distributed programmes; fines imposed on broadcasters, court costs paid to the State Treasury

Detailed execution of KRRiT revenues in 2024 compared to the financial plan broken down by paragraph is presented in **Attachment No. 23**.

In 2024, the National Broadcasting Council allocated PLN 86,408,600 for the performance of its tasks, of which PLN 49,461,400 was allocated to the National Media Institute (*KiM*) for the performance of tasks for its founding body.

Detailed information on the implementation of the National Broadcasting Council's expenditure in 2024 is presented in **Attachment No. 24**.

The average annual employment in 2024 was 151.08 full-time positions (KRRiT 5 full-time positions and KRRiT office staff at 146.08 full-time positions).

Pursuant to the Public Finance Act¹⁶⁴ after analysing the degree of task completion and the level of budget utilisation, the Chairman of the National Broadcasting Council issued decisions during the year to block planned expenditure in the amount of PLN 3,848,900.

¹⁶³ On December 23, 2024, funds were transferred to the KRRiT bank account by the District Court for Katowice-Wschód as a refund of a deposit for Radio Katowice (regarding the tranche transferred to the court deposit on March 15, 2024). Pursuant to KRRiT Resolution No. 12/2025, funds in the amount of PLN 739,600.00 were transferred on January 9, 2025, to the bank account of Radio Katowice.

¹⁶⁴ See Article 177(1)(2) and (3) in conjunction with Article 3(2) of the Act of 27 August 2009 on public finance (Journal of Laws 2023, item 1270, as amended).

Attachments

Attachment No. 1 List of all penalty decisions issued by the Chairman of the National Broadcasting Council in 2024.

The Chairman of the National Broadcasting Council issued the following penalty decisions:

- Decision No. DM-56-2023 of 3 January 2024. Stars.TV s.r.o., broadcaster of the programme STARS.TV, a penalty of PLN 20,000 for broadcasting a commercial for alcoholic beverages (Article 16b(1)(2) of the Broadcasting Act in conjunction with Article 13¹(2)(1) of the Act on Upbringing in Sobriety and Counteracting Alcoholism);
- Decision No. DM-1-2024 of 3 January 2024 BIZNES24 Sp. z o.o., broadcaster of the programme Biznes24, a fine of PLN 4,000 for broadcasting commercial communication for alcoholic beverages (Article 16b(1)(2) of the Radio and Television Broadcasting Act in conjunction with Article 13¹(2), point 1 of the Act on Upbringing in Sobriety and Counteracting Alcoholism);
- Decision No. 1/DPz/2024 of 11 January 2024 Telewizja Polska SA, broadcaster of the TVP Kultura programme, a fine of PLN 15,000 for broadcasting programmes or other transmissions containing scenes or content that could have a negative impact on the proper physical, mental or moral development of minors, as well as vulgar language (Article 18(5) and Article 18(7) of the Radio and Television Broadcasting Act);
- Decision No. DM-2-2024 of 10 January 2024, Red Carpet Media Group SA, broadcaster of the programme RedCarpet TV, a fine of PLN 15,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision DM-3-2024 of 17 January 2024, Polo TV Sp. z o.o., broadcaster of the Polo TV programme, a fine of PLN 20,000 for inappropriate labelling of broadcast material with a graphic symbol (Article 18(5b)(1) of the Act and § 6(1)(4), (2) and (4) of the KRRiT Regulation on the classification, dissemination and manner of announcing programmes or other transmissions that may have a negative impact on the development of minors); 2 and 4 of the KRRiT Regulation on the classification, dissemination and manner of announcing programmes or other broadcasts that may have a negative impact on the development of minors);
- Decision No. 2/DPz/2024 of 23 January 2024, Inforadio Sp. z o.o., broadcaster of the TOK FM programme, a penalty of PLN 88,000 for broadcasting messages promoting illegal activities, in particular containing hate speech, i.e. content inciting hatred or violence and discriminating on the basis of beliefs, political views or any other views (Article 18(1) of the Broadcasting Act);
- Decision No. DM-4-2024 of 23 January 2024. Biznes24 Sp. z o.o., broadcaster of the programme Biznes24, a fine of PLN 2,500 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);

- Decision No. DM-5-2024 of 2 February 2024. Telewizja Republika SA, broadcaster of the programme Telewizja Republika, a fine of PLN 13,000 for broadcasting alcoholic beverages (Article 16b(1)(2) of the Radio and Television Broadcasting Act in conjunction with Article 13¹(2)(1)(3 of the Act on Upbringing in Sobriety and Counteracting Alcoholism)
- Decision No. 3/DPz/2024 of 7 February 2024 Telewizja Puls Sp. z o.o., broadcaster of the TV Puls programme, a fine of PLN 30,000 for broadcasting programmes or other transmissions containing scenes or content that may have a negative impact on the proper physical, mental or moral development of minors (Article 18(5) of the Broadcasting Act);
- Decision No. DM-6-2024 of 2 February 2024. Biznes24 Sp. z o.o., broadcaster of the Biznes24 programme, a fine of PLN 2,600 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-7-2024 of 6 February 2024 Motowizja Sp. z o.o., broadcaster of the Motowizja programme, a fine of PLN 2,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-8-2024 of 13 February 2024 Telewizja Polsat Sp. z o.o., broadcaster of the programme Polsat Sport, a fine of PLN 25,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-9-2024 of 12 February, Telewizja Polsat Sp. z o.o., broadcaster of the TV4 programme, fine of PLN 20,000 for broadcasting self-promotional messages incorrectly labelled as broadcaster announcements, and consequently exceeding the permissible advertising time (Article 16(5) in conjunction with Article 16(4)(1) and (1a) and Article 16(3)(1) of the Broadcasting Act);
- Decision No. DM-10-2024 of 13 February 2024, Motowizja Sp. z o.o., broadcaster of the programme Motowizja, a fine of PLN 2,300 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-11-2024 of 13 February 2024, Młodzieżowa Spółdzielnia Mieszkaniowa w Toruniu, broadcaster of the programme Telewizja Toruń, a fine of PLN 1,200 for failure to comply with the obligation to classify and mark programmes with a graphic symbol (Article 18(5b)(1) of the Broadcasting Act and § 6(1) of the KRRiT Regulation of 13 April 2022 on the classification, dissemination and manner of announcing programmes or other transmissions that may have a negative impact on the development of minors);
- Decision No. DM-12-2024 of 13 February 2024, a person conducting business activity, broadcaster of the Tel-Ka programme, a fine of PLN 1,200 for failure to comply with the obligation to classify and label programmes with a graphic symbol (Article 18(5b)(1) of the Broadcasting Act and § 6(1) of the KRRiT Regulation of 13 April 2022 on the classification, dissemination and announcement of programmes or other transmissions that may have a negative impact on the development of minors);

- Decision No. 4/DPz/2024 of 4 March 2024 TVN SA, broadcaster of the TVN programme, a fine of PLN 550,000 for promoting activities contrary to the law, views and attitudes contrary to morality and social welfare, and containing content inciting hatred and discrimination, as well as a lack of respect for the religious beliefs of viewers, in particular the Christian value system, for broadcasting a programme from the series Czarno na białym – reportage *Bielmo.Franciszkańska 3* (Article 18(1) and (2) of the Broadcasting Act);
- Decision No. DM-13-2024 of 6 March 2024 Red Carpet Media Group SA, broadcaster of the programme Red Carpet TV, a fine of PLN 15,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-14-2024 of 15 March 2024. 4FUN Sp. z o.o., broadcaster of the programme 4FUN DANCE, a fine of PLN 10,000 for exceeding the permissible advertising time (Article 16(3)(1) of the Radio and Television Broadcasting Act);
- Decision No. DM-15-2024 of 20 March 2024 Telewizja Polsat Sp. z o.o., broadcaster of the Polsat Sport programme, a fine of PLN 5,000 for failing to ensure, in the fourth quarter of 2023, at least 10% of the quarterly broadcasting time for European programmes produced by independent producers, excluding news services, advertising, teleshopping, sports broadcasts, text transmissions and game shows (Article 15a(1) of the Broadcasting Act);
- Decision No. DM-16-2024 of 21 March 2024, Stopklatka SA, broadcaster of the programme Stopklatka, a penalty of PLN 15,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. 5/DPz/2024 of 25 March 2024, Wielkopolska Telewizja Kablowa Sp. z o.o., broadcaster of the WTK programme, a penalty of PLN 3,000 for excessive exposure of a placed product (Article 17a(5)(1) of the Broadcasting Act)
- Decision No. 6/DPz/2024 of 25 March 2024, Mr Daniel Maksymilian Gorgosz – liquidator of TVP SA, a penalty of PLN 145,200 for failure to provide information required under Article 10(2) of the Broadcasting Act;
- Decision No. DM-18-2024 of 25 March 2024, private individual conducting business activity, broadcaster of the programme POWER TV, fine of PLN 2,200 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-19-2024 of 25 March 2024, Telewizja Polsat Sp. z o.o., broadcaster of the PolsatSport News programme, a fine of PLN 10,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. 7/DPz/2024 of 9 April 2024, TVN SA, broadcaster of the TVN 24 programme, a fine of PLN 19,526.45 for broadcasting a programme containing vulgar content (Article 18(7) of the Broadcasting Act);

- Decision No. DM-22-2024 of 9 April 2024, Fratria Sp. z o.o., broadcaster of the programme Telewizja wPolsce.pl, a fine of PLN 2,000 for exceeding the permissible advertising time (Article 16(3)(1) of the Broadcasting Act);
- Decision No. DM-23-2024 of 12 April 2024, R.D.F. Entertainment Sp. z o.o., broadcaster of the programme Active Family, a fine of PLN 5,000 for broadcasting advertisements for non-alcoholic beverages whose name, trademark, graphic design or packaging uses a similarity or is identical to the designation of an alcoholic beverage (Article 16b(1)(2) of the Radio and Television Broadcasting Act in conjunction with Article 13¹(2(1) and (3) of the Act on Upbringing in Sobriety and Counteracting Alcoholism);
- Decision No. DM-24-2024 of 15 April 2024, R.D.F. Entertainment Sp. z o.o., broadcaster of the Active Family programme, a fine of PLN 6,000 for broadcasting advertisements for non-alcoholic beverages whose name, trademark, graphic design or packaging uses a similarity or is identical to the designation of an alcoholic beverage (Article 16b(1)(2) of the Radio and Television Broadcasting Act in conjunction with Article 13¹(2(1) and (3) of the Act on Upbringing in Sobriety and Counteracting Alcoholism);
- Decision No. 8/DPz/2024 of 23 April 2024, a private individual conducting business activity, broadcaster of the TV Mazowsze programme, a fine of PLN 3,000 for broadcasting a hidden commercial message and violating the ban on advertising beer (Article 16c(1) and Article 16b(1 and 2 of the Broadcasting Act in conjunction with Article 13¹(2)(2) of the Act on Upbringing in Sobriety and Counteracting Alcoholism);
- Decision No. DM-25-2024 of 23 April 2024. Telewizja Polsat Sp. z o.o., broadcaster of the programme Wydarzenia 24, a fine of PLN 22,000 for exceeding the permissible advertising time (Article 16(3)(1) of the Broadcasting Act);
- Decision No. DM-26-2024 of 23 April 2024 CANAL+ Polska SA, broadcaster of Canal+ Sport, fined PLN 5,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-27-2024 of 7 May 2024 CANAL+ Polska SA, broadcaster of the Canal+ Kuchnia programme, a fine of PLN 3,000 for violating the provisions on programmes for persons with disabilities (Article 18a(1) of the Act in conjunction with § 9 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes;
- Decision No. 9/DPz/2024 of 23 May 2024. Inforadio Sp. z o.o., broadcaster of the programme TOK FM, a fine of PLN 10,000 for broadcasting a programme containing profanity (Article 18(7) of the Broadcasting Act);
- Decision No. 10/DPz/2024 of 23 May 2024 private individual conducting business activity, broadcaster of the TV Mazowsze programme, a fine of PLN 3,000 for excessive exposure of a placed product and promotional reference to the products of the placing entity (Article 17a(5)(1) of the Radio and Television Broadcasting Act);

- Decision No. DM-31-2024 of 28 May 2024. Telewizja Polska SA, broadcaster of the programme ALFA TVP, a fine of PLN 5,000 for violating the provisions on programmes for persons with disabilities (Article 18a(1) of the Act in conjunction with § 5(1)(a) of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes); 1(a) of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes);
- Decision No. DM-32-2024 of 28 May 2024. Telewizja Polska SA, broadcaster of the TVP Kultura programme, fined PLN 5,000 for violating regulations concerning programmes for persons with disabilities (Article 18a(1) of the Act in conjunction with § 4(1)(a) 1(a) and § 9 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes);
- Decision No. DM-33-2024 of 29 May 2024, a private individual conducting business activity, broadcaster of the programme ANTENA HD, a fine of PLN 3,000 for violating the provisions on programmes for persons with disabilities (Article 18a(1) of the Act in conjunction with § 4(1)(b) and § 9 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes); 1(b) and § 9 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes);
- Decision No. DM-34-2024 of 3 June 2024 BIZNES24 Sp. z o.o., broadcaster of the programme BIZNES24, a fine of PLN 3,000 for violating the provisions on programmes for persons with disabilities (Article 18a(1) of the Act in conjunction with § 7(1) 1 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes);
- Decision No. DM-35-2024 of 13 June 2024 MF CASH Sp. z o.o., which made the programme Alkomaster 2 – Wesele available on a pay-per-view basis, a fine of PLN 100,000 for advertising and promoting alcohol during the broadcast of the programme (Article 16b(1)(2) of the Broadcasting Act in conjunction with Article 13¹(1 of the Act on Upbringing in Sobriety and Counteracting Alcoholism), as well as for promoting harmful, pathological patterns of behaviour related to alcohol consumption, aggression and humiliation of other persons, including those with sexual undertones (Article 18(3) and Article 18(4) of the Broadcasting Act);
- Decision No. DM-36-2024 of 24 June 2024. Telewizja Polsat SA, broadcaster of the Polsat Sport 2 programme, a fine of PLN 20,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-37-2024 of 24 June 2024. Telewizja PULS Sp. z o.o., broadcaster of the TV PULS programme, a fine of PLN 5,000 for violating the provisions on programmes for persons with disabilities (Article 18a(1) of the Radio and Television Broadcasting Act in conjunction with § 4(1)(b) of the KRRiT Regulation on facilities for persons with disabilities in television programmes); 1(b) of the KRRiT Regulation on facilities for persons with disabilities in television programmes);
- Decision No. DM-38-2024 of 24 June 2024. Telewizja Republika SA, broadcaster of the programme TelewizjaRepublika, fined PLN 8,000 for violating provisions concerning programmes for persons with disabilities (Article 18a(1) of the Broadcasting Act in conjunction with § 4(b) and § 9 of the KRRiT Regulation on facilities for persons with disabilities in television programmes);

- Decision No. DM-39-2024 of 24 June 2024. 1(b) and § 9 of the KRRiT Regulation on facilities for persons with disabilities in television programmes;
- Decision No. DM-39-2024 of 24 June 2024 Telewizja Republika SA, broadcaster of the programme TelewizjaRepublika, a fine of PLN 8,000 for violating regulations concerning programmes for persons with disabilities (Article 18a(1) of the Broadcasting Act in conjunction with § 4(1)(b) and § 9 of the KRRiT Regulation on facilities for persons with disabilities in television programmes;
- Decision No. DM-40-2024 of 24 June 2024. Telewizja Polska SA, broadcaster of the TVP Kultura programme, fined PLN 8,000 for violating regulations concerning programmes for persons with disabilities (Article 18a(1) of the Broadcasting Act in conjunction with § 4(1)(a) and § 9 of the KRRiT Regulation on facilities for persons with disabilities in television programmes; 1(a) and § 9 of the KRRiT Regulation on facilities for persons with disabilities in television programmes;
- Decision No. 11/DPz/2024 of 28 June 2024, Telewizja Polsat SA, broadcaster of the Polsat Doku programme, a fine of PLN 50,000 for broadcasting programmes or other transmissions containing scenes or content that may have a negative impact on the proper physical, mental or moral development of minors, with an age rating of '12+' (Article 18(5) of the Broadcasting Act);
- Decision No. DM-41-2024 of 2 July 2024, MF CASH Sp. z o.o., which made available on YouTube a programme entitled Alkomaster 2 – Wesele, a fine of PLN 80,000 for advertising and promoting alcohol (Article 16b(1)(2) in conjunction with Article 47k of the Broadcasting Act and Article 13¹(1) of the Act on Upbringing in Sobriety and Counteracting Alcoholism), making available harmful, pathological patterns of behaviour related to alcohol consumption, aggression and humiliation of other persons without effective safeguards to protect minors (Article 47e(1) in conjunction with Article 18(4) of the Broadcasting Act) and for failing to provide users with easy, direct and permanent access to information enabling the identification of the service and the entity providing the on-demand audiovisual media service (Article 47c(1)-(2) of the Radio and Television Broadcasting Act);
- Decision No. 12/DPz/2024 of 16 July 2024, Telewizja Polsat Sp. z o.o., broadcaster of the Polsat programme), a fine of PLN 20,000 for broadcasting a programme containing vulgar content (Article 18(7) of the Radio and Television Broadcasting Act);
- Decision No. DM-42-2024 of 30 July 2024, TV Spektrum Sp. z o.o., broadcaster of the Polsat News Polityka programme, a penalty of PLN 4,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Radio and Television Broadcasting Act);
- Decision No. DM-43-2024 of 5 August 2024, Telewizja Polska SA, broadcaster of the TVP Nauka programme, a fine of PLN 4,000 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);
- Decision No. DM-44-2024 of 9 August 2024. Telewizja Polska SA, broadcaster of the TVP Sport programme, a fine of PLN 30,000 for broadcasting commercial messages for alcoholic beverages

(Article 16b(1)(2) of the Radio and Television Broadcasting Act in conjunction with Article 13¹(2)(1) of the Act on Upbringing in Sobriety and Counteracting Alcoholism);

- Decision No. DMM-55/2024 of 20 August 2024, a private individual providing on-demand media services via YouTube, a fine of PLN 50,000 for failure to register with the register of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Broadcasting Act); 1 in conjunction with Article 47ca(1) of the Broadcasting Act);
- Decision No. DMM-56/2024 of 20 August 2024, a private individual providing an on-demand media service via the video-sharing platform KICK. COM, a fine of PLN 50,000 for failure to submit a notification to the list of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Broadcasting Act);
- Decision No. DMM-57/2024 of 20 August 2024, a private individual providing a media service on demand via the YouTube platform called Amadi, a fine of PLN 50,000 for failure to register with the register of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Broadcasting Act); Amadi, a fine of PLN 50,000 for failure to notify the list of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Broadcasting Act);
- Decision No. DM-46-2024 of 26 August 2024 Golf Zone Sp. z o.o., broadcaster of the Golf Zone programme, a fine of PLN 1,000 for violating the provisions on the allocation of broadcasting time to European programmes (Article 15(3) of the Radio and Television Broadcasting Act);
- Decision No. DM-47-2024 of 26 August 2024 Golf Zone Sp. z o.o., broadcaster of the Golf Zone programme, a fine of PLN 1,500 for violating the provisions on the allocation of broadcasting time to programmes originally produced in Polish (Article 15(1) of the Radio and Television Broadcasting Act);
- Decision No. DM-48-2024 of 27 August 2024, private individual conducting business activity, broadcaster of the programme TOP KIDS, a fine of PLN 1,000. for failing to ensure that at least 5% of the quarterly broadcasting time was devoted to European programmes produced by independent producers in the first quarter of 2024 (Article 15a(2) of the Broadcasting Act);
- Decision No. DM-49-2024 of 29 August 2024. Biznes24 Sp. z o.o., broadcaster of the programme BIZNES24, a fine of PLN 4,100. for broadcasting a commercial for an alcoholic beverage (Article 16b(1)(2) of the Radio and Television Broadcasting Act in conjunction with Article 13¹(2)(1) of the Act on Upbringing in Sobriety and Counteracting Alcoholism);
- Decision No. DMM-62/2024 of 4 September 2024 Federacja Gromda F.C. Sp. z o.o., providing on-demand media services GROMDA.TV via a website, a fine of PLN 50,000 for failure to register in the list of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Radio and Television Broadcasting Act);
- Decision No. DMM-63/2024 of 4 September 2024. Federacja Gromda F.C. Sp. z o.o., providing the on-demand media service GROMDA via the YouTube video sharing platform, a a fine of PLN

50,000 for failure to register with the register of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Broadcasting Act);

- Decision No. 13/DPz/2024 of 5 September 2024. Telewizja Polska SA, broadcaster of TVP Info, a fine of PLN 15,000 for broadcasting a programme containing vulgar content (Article 18(7) of the Radio and Television Broadcasting Act);

- Decision No. 14/DPz/2024 of 16 September 2024, private individual conducting business activity, broadcaster of the TV Mazowsze programme, a fine of PLN 2,000 for failing to provide neutral information about the producer or seller of the product being placed or the entity providing the service being placed, and about the product or service itself, and for excessive exposure of the product being placed and promotional references to the products of the entity placing the product (Article 17a(3) and (5)(1) and (2) of the Broadcasting Act);

- Decision No. DM-50-2024 of 26 September 2024, TVN SA, broadcaster of TVN siedem and TVN Fabuła, a fine of PLN 35,000 for broadcasting programmes or other transmissions containing scenes or content that could have a negative impact on the proper physical, mental or moral development of minors (Article 18(5) and (5a)(1) and (2) of the Broadcasting Act and

§2, § 4(1)(1) and (2) as well as § 4(5) and (6) of the Regulation on the classification, dissemination and manner of announcing programmes or other broadcasts that may have a negative impact on the development of minors in connection with their dissemination);

- Decision No. DMM-79/2024 of 3 October 2024: a private individual providing an on-demand media service called 'Tazy8' via the KICK.COM video sharing platform, a penalty of PLN 120,000. for failure to notify the register of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Broadcasting Act);

- Decision No. DMM 128/2024 of 12 November 2024, a private individual providing a media service on demand DeeJayPallaside via the video sharing platform YouTube <https://www.youtube.com/@DeeJayPallaside>; a penalty of PLN 100,000 for failure to register with the register of on-demand audiovisual media services (Article 53c(1) in conjunction with Article 47ca(1) of the Broadcasting Act);

- Decision No. 15/DPz/2024 of 14 November 2024 Telewizja Puls Sp. z o.o., broadcaster of the TV Puls programme, a fine of PLN 30,000 for broadcasting programmes or other transmissions containing scenes or content that could have a negative impact on the proper physical, mental or moral development of minors, marked with the age category 'from 16 years of age' (Article 18(5) of the Broadcasting Act);

- Decision No. DM-51-2024 of 12 November 2024, BIZNES24 Sp. z o.o., broadcaster of the programme BIZNES24, a fine of PLN 4,200 for exceeding the permissible advertising time (Article 16(3)(2) of the Broadcasting Act);

- Decision No. 16/DPz/2024 of 20 November 2024, TVN SA, broadcaster of the TVN24 GO programme, a fine of PLN 142,800 for publishing material containing content inciting hatred or

discrimination on the grounds of religion, beliefs or political views (violation of Article 47h of the Broadcasting Act);

- Decision No. DM-52-2024 of 16 December 2024, CANAL+ Polska SA, broadcaster of the programme CANAL+ Sport 4, a fine of PLN 5,200 for exceeding the permissible advertising time (violation of Article 16(3)(1) of the Broadcasting Act);
- Decision No. DM-53-2024 of 30 December 2024, private individual conducting business activity, broadcaster of the programme TOP Kids, a fine of PLN 1,500 for violation of provisions concerning programmes for persons with disabilities (Article 18a(1) 1 of the Broadcasting Act in conjunction with § 5(1)(a) and § 9 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes);
- Decision No. DM-54-2024 of 30 December 2024, private individual conducting business activity, broadcaster of the TOP Kids programme, a fine of PLN 1,800 for violating regulations concerning programmes for persons with disabilities (Article 18a(1) of the Broadcasting Act in conjunction with § 4(1)(a) and (b) and § 9 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes);
- Decision No. DM-55-2024 of 30 December 2024, Golf Zone Sp. z o.o., broadcaster of the Golf Channel programme, a fine of PLN 1,800 for violating regulations concerning programmes for persons with disabilities (Article 18a(1) of the Broadcasting Act in conjunction with § 4(1)(a) and (b) and § 9 of the KRRiT Regulation of 13 April 2022 on facilities for persons with disabilities in television programmes).

**Attachment No. 2 Mission costs presented by public broadcasters
in their annual reports for 2023, in accordance with
Article 31b of the Broadcasting Act**

(in thousands PLN)

Company	Subscription and compensation (bonds at nominal value) transferred to public broadcasters in 2023	Total mission costs according to annual reports of public broadcasters	Information on the surplus referred to in Article 31(7) and (8) of the Broadcasting Act according to the annual reports of public broadcasters
I. Telewizja Polska S.A.	2,661,994.0	3,813,021	19,882
II. Polskie Radio S.A.	337,860.0	376,146	48,882
III. Regional radio stations	320,136.3	353,865	15,202
Radio Białystok S.A.	19,770.7	20,608	1,010
Radio Pomorza i Kujaw S.A.	18,181.7	19,184	1,111
Radio Gdańsk S.A.	18,247.7	23,487	534
Radio Katowice S.A.	23,008.7	25,686	936
Radio Kielce S.A.	20,595.7	24,691	-1,548
Radio Koszalin S.A.	17,973.7	19,096	0
Radio Kraków S.A.	19,848.7	21,169	833
Radio Lublin S.A.	19,577.0	20,531	1,027
Radio Łódź S.A.	19,247.7	17,782	4,389
Radio Olsztyn S.A.	17,329.7	18,241	107
Radio Opole S.A.	18,147.7	18,615	1,407
Radio Poznań S.A.	18,552.7	19,471	1,868
Radio Rzeszów S.A.	19,197.7	21,712	1,288
Radio Szczecin S.A.	16,104.7	20,452	1,620
Radio dla Ciebie S.A.	18,207.7	19,716	306
Radio Wrocław S.A.	19,036.7	24,634	-107
Radio Zachód S.A.	17,107.8	18,790	421
TOTAL	3,319,990.3	4,543,032	83,966

Source: National Broadcasting Council based on financial data provided by the following public broadcasters.

Attachment No.3 Revenue from subscription fees allocated by the National Broadcasting Council in 2024 to public radio and television entities

(amounts in PLN)

Date	Subscription fees for public broadcasters transferred to court deposits	Subscription fees for public broadcasters transferred to company accounts	Broadcaster
1.	2.	3.	4.
12.02.2024	158,000,000	-	19 companies
15.03.2024	44,785,230	-	17 companies
	-	720,420	Radio Poznań
	-	694,350	Radio Dla Ciebie
15.04.2024	44,785,230	-	17 companies
	-	720,420	Radio Poznań
	-	694,350	Radio Dla Ciebie
15.05.2024	44,785,230	-	17 companies
	-	720,420	Radio Poznań
	-	694,350	Radio Dla Ciebie
14.06.2024	44,785,230	-	17 companies
	-	720,420	Radio Poznań
	-	694,350	Radio Dla Ciebie
15.07.2024	43,421,180	-	15 companies
	-	739,600	Radio Katowice
	-	624,450	Radio Lublin
	-	720,420	Radio Poznań
	-	694,350	Radio Dla Ciebie
14.08.2024	42,136,370	-	13 companies
	-	739,600	Radio Katowice
	-	624,450	Radio Lublin
	-	641,730	Radio Łódź
	-	720,420	Radio Poznań
	-	643,080	Radio Rzeszów
	-	694,350	Radio dla Ciebie
02.09.2024	-624,450	-	Deposit return to Radio Lublin
05.09.2024	-	624,450	Radio Lublin
13.09.2024	41,444,220	-	12 companies
	-	739,600	Radio Katowice
	-	624,450	Radio Lublin
	-	641,730	Radio Łódź
	-	720,420	Radio Poznań
	-	643,080	Radio Rzeszów
	-	694,350	Radio dla Ciebie
	-	692,150	Radio Gdańsk

Date	Subscription fees for public broadcasters transferred to court deposits	Subscription fees for public broadcasters transferred to company accounts	Broadcaster
1	2	3	4
19.09.2024	-	46,200,000	All companies
15.11.2024	-	46,200,000	All companies
21.11.2024	-3,117,040	-	Deposit return to Radio Białystok
29.11.2024	-	3,117,040	Radio Białystok
13.12.2024	-	46,200,000	All companies
TOTAL:	460,401,200	159,598,800	
TOTAL: 620,000,000			
23.12.2024	-739,600	-	Deposit return to Radio Katowice *
TOTAL:	459,661,600	159,598,800	-

*On 8 January 2025, the National Broadcasting Council adopted Resolution No. 12/2025 on the transfer to Polish Radio – Regional Broadcasting Station in Katowice ‘Radio Katowice’ S.A. funds from the subscription fees in connection with the return of these funds to the National Broadcasting Council from the deposit account of the Minister of Finance by the District Court for Katowice-Wschód. The funds returned from the deposit in the amount of PLN 739,600.00 were transferred to the bank account of Radio Katowice on 9 January 2025.

Source: KRRiT Office

Attachment No. 4 Funds available from subscription fees from 2024 and surpluses from 2022 transferred by the National Broadcasting Council to public radio and television companies in 2024

(in thousands PLN)

Companies	Funds from subscription fees from 2024 and surpluses from 2022 paid by the KRRiT in 2024	Subscription fees for public broadcasters transferred to court deposits	Subscription fees for public broadcasters transferred to the accounts of companies
I. Telewizja Polska S.A.	327,548	245,514	82,034
II. Polskie Radio S.A.	157,352	117,943	39,409
III. Regional broadcasting stations	157,351	96,944	60,407
Radio Białystok S.A.	9,786	4,221	5,565
Radio Pomorza i Kujaw S.A.	9,139	6,852	2 287
Radio Gdańsk S.A.	9,617	6,514	3,103
Radio Katowice S.A.	10,284	5,490	4,794
Radio Kielce S.A.	8,940	6,703	2,237
Radio Koszalin S.A.	9,018	6,763	2,255
Radio Kraków S.A.	9,682	7,256	2,426
Radio Lublin S.A.	8,685	4,014	4,671
Radio Łódź S.A.	8,918	5,400	3,518
Radio Olsztyn S.A.	8,771	6,571	2,199
Radio Opole S.A.	9,344	7,000	2,344
Radio Poznań S.A.	10,013	2,462	7,551
Radio Rzeszów S.A.	8,945	5,421	3,524
Radio Szczecin S.A.	9,547	7,153	2,394
Radio dla Ciebie S.A.	9,661	2,384	7,278
Radio Wrocław S.A.	8,983	6,732	2,251
Radio Zachód S.A.	8,018	6,009	2,009
TOTAL	642,251	460,401	181,850

Source: KRRiT Office

Attachment No. 5 Expenses associated with performing public mission obligations by *Telewizja Polska SA* (Polish Television) in 2024

(in thousands PLN)

Projects fulfilling the public mission	Expenses	Including costs covered by licence fees
1. Creating nationwide programmes	1,442,551	50,971
of which for the following TV programmes:		
TVP 1	844,170	29,533
TVP 2	598,381	21,438
2. Creating regional programmes	385,022	55,250
of which for the following TV programmes:		
TVP3 Białystok	17,900	2,810
TVP 3 Bydgoszcz	23,719	3,182
TVP 3 Gdańsk	27,990	4,311
TVP 3 Gorzów Wielkopolski	13,061	1,780
TVP 3 Katowice	36,327	4,721
TVP 3 Kielce	15,576	2,069
TVP 3 Kraków	41,573	5,062
TVP 3 Lublin	24,548	3,175
TVP 3 Łódź	25,143	3,491
TVP 3 Olsztyn	10,888	1,958
TVP 3 Opole	11,623	1,517
TVP 3 Poznań	25,791	4,662
TVP 3 Rzeszów	19,327	2,927
TVP 3 Szczecin	22,902	3,671
TVP 3 Warszawa	34,712	5,189
TVP 3 Wrocław	33,942	4,725
3. Creating the TVP 3 Regionalna programme	35,049	23
4. Creating the TVP Polonia programme	41,551	0
5. Creating the TVP Wilno programme	45,496	0
6. Creating the TVP World programme	86,533	0
7. Creating the Bielsat TV programme	72,729	0
8. Creating specialised programmes	574,186	8,445
Of which, for the following programmes:		
TVP Kultura (and TVP Kultura 2)	30,294	1,531
TVP Historia (and TVP Historia 2)	17,337	626
TVP ABC (and TVP ABC 2)	15,239	1,656
TVP Info	238,990	4,632
TVP Sport	227,909	0
TVP Seriale	4,970	0
TVP HD	4,624	0
TVP Rozrywka	5,110	0

TVP 4K	0	0
TVP Dokument	9,260	0
TVP Nauka	8,829	0
TVP Kobieta	7,609	0
Alfa TVP	4,015	0
9. Distribution of programmes: national, regional, TVP 3, specialised, TVP Polonia, TVP World, TVP Wilno and Bielsat TV	159,389	14,808
10. Other tasks fulfilling the public mission	149,022	1,013
of which for:		
Other antennae	43,267	0
Public Media Digital Library	429	213
Multimedia offer	62,629	0
Broadcast and transmission	40,870	0
Telegazeta	427	0
HD vehicle	1,400	800
11. Total PUBLIC MISSION COST (1+2+3+4+5+6+7+8+9+10)	2,991,528	130,510

Source: National Broadcasting Council (KRRiT). Data compiled on the basis of preliminary financial information provided by Telewizja Polska (Polish Television).

Attachment No. 6 Expenses associated with performing the public service mission at *Polskie Radio SA* (Polish Radio)

(in thousands of PLN)

Public mission projects	Costs	Including costs financed from the subscription fee
1. Developing national programmes	220,177	22,319
From which funding to:		
Programme 1	82,509	6,486
Programme 2	51,622	5,910
Programme 3	44,121	4,948
Programme 4 - Polskie Radio 24	41,925	4,975
2. Development of specialised programmes	40,746	6,015
Of which:		
Czwórka (Channel 4) Polskie Radio	16,310	2,200
Polskie Radio Dzieciom (Polish Radio for Children)	9,246	1,675
Polskie Radio Chopin	4,119	542
Polskie Radio Kierowców	6,826	963
Polskie Radio dla Ukrainy	4,245	635
3. Creation of the Polish Radio for Foreigners programme	17,275	0
4. Analogue broadcasting of national programmes and Radio for Ukraine	65,911	3,154
5. Analogue broadcasting of programmes for listeners in other countries	1,944	668
6. Broadcasting programmes in the DAB+ digital standard (national, specialised and Polish Radio for Foreigners)	15,950	388
7. Other tasks fulfilling the public mission	14,209	3,051
Of which:		
<i>Teatr Polskiego Radia</i> (Polish Radio theatre broadcasts)	1,003	0
<i>Studio Reportażu i Dokumentu</i> (Reportage and Documentary Studio)	205	0

<i>Radiowe Centrum Kultury Ludowej (Radio Centre for Folk Culture)</i>	1,972	0
<i>Radiowe Centrum Nadawcze PR w Solcu Kujawskim (PR Radio Broadcasting Centre in Solec Kujawski)</i>	10,866	3,051
<i>Piknik Naukowy (Scientific Picnic)</i>	163	0
8. Total public mission costs (1+2+3+4+5+6+7)	376,212	35,595

In addition, in 2024, the Company incurred investment expenditure of PLN 16,761,000 which was financed from subscription fees and own funds.

Source: National Broadcasting Council Office. Data compiled on the basis of preliminary financial information provided by Polish Radio.

Attachment No. 7 Costs associated with performing the public service mission by regional radio broadcasting companies in 2024

Company	Creation of regional programmes	Programme creation:		Programme broadcasting:		Remaining public mission tasks	TOTAL Public mission cost (2÷7)	Including costs financed from subscription fees	No coverage of public mission costs
		specialised	urban	analogue	Digital in DAB+				
1	2	3	4	5	6	7	8	9	10
Radio Białystok S.A.	17,209	0	0	940	117	1,110	19,376	5,566	0
Radio Pomorza i Kujaw S.A.	14,367	0	0	2,426	378	2,679	19,850	2, 287	2,728
Radio Gdańsk S.A.	19,592	0	0	1,789	211	975	22,567	3,017	430
Radio Katowice S.A.	19,145	0	0	2,284	179	2,362	23,970	4,794	4,654
Radio Kielce S.A.	13,884	134	0	1,084	152	2,174	17,428	2,238	1,224
Radio Koszalin S.A.	16,707	0	0	1,148	182	870	18,907	2,245	3,208
Radio Kraków S.A.	19,743	1,014	0	1,594	270	637	23,258	2,426	0
Radio Lublin S.A.	15,506	0	553	1,545	209	1,014	18,827	4,672	1,619
Radio Łódź S.A.	12,917	0	0	1,060	182	3,470	17,629	3,518	0
Radio Olsztyn S.A.	16,715	301	0	1,133	177	307	18,633	4,982	0
Radio Opole S.A.	13,474	183	0	2,090	140	599	16,486	2,344	278
Radio Poznań S.A.	15,674	0	260	2,581	277	819	19,611	8,702	0
Radio Rzeszów S.A.	15,711	0	0	1,830	195	384	18,120	3,524	1,595
Radio Szczecin S.A.	12,793	394	0	1,247	145	1,056	15,635	2,393	41
Radio dla Ciebie S.A.	17,418	0	0	1,931	336	565	20,250	6,958	3,782
Radio Wrocław S.A.	16,523	714	1,999	1,756	218	895	22,105	2,251	1,066
Radio Zachód S.A.	14,317	0	3,370	921	114	769	19,491	2,009	4,193
TOTAL	271,695	2,740	6,182	27,359	3,482	20,685	332,143	63,926^{x)}	24,818

^{x)} In addition, in 2024, regional companies incurred investment expenditure of PLN 5,576,000, which was financed from licence fee revenue, licence fee surpluses, licence fees allocated to depreciation costs, own funds and subsidies.
Source: KRRiT Office. Data compiled on the basis of preliminary financial information from regional radio companies.

Attachment No. 8 List of decisions issued in connection with the broadcasting of satellite television programmes

No.	Licence No./Decision No.	Broadcaster name (programme name)	Decision
1.	863/2024-T	MWE FAMILY Sp. z o.o. (‘SZLAGIER TV’)	Granting a licence
2.	864/2024-T	MWE FAMILY Sp. z o.o. (‘TVC Super’)	Granting a licence
3.	868/2024-T	CANAL+Polska S.A. (‘CANAL+ 360’)	Granting a licence
4.	869/2024-T	CANAL+Polska S.A. (‘CANAL+ EXTRA 1’)	Granting a licence
5.	870/2024-T	CANAL+Polska S.A. (‘CANAL+ EXTRA 2’)	Granting a licence
6.	871/2024-T	CANAL+Polska S.A. (‘CANAL+ EXTRA 3’)	Granting a licence
7.	872/2024-T	CANAL+Polska S.A. (‘CANAL+ EXTRA 4’)	Granting a licence
8.	596/K/2024-T	CANAL+Polska S.A. (‘MiniMini+’)	Granting a licence for 10 more years
9.	597/K/2024-T	Michał Winnicki (‘ADVENTURE’)	Granting a licence for 10 more years
10.	602/K/2024-T	CANAL+Polska S.A. (‘Planete+’)	Granting a licence for 10 more years
11.	603/K/2024-T	Telewizja Polsat Sp. z o.o. (‘Polsat News 2’)	Granting a licence for 10 more years
12.	608/K/2024-T	Telewizja Polsat Sp. z o.o. (‘Disco Polo Music’)	Granting a licence for 10 more years
13.	610/K/2024-T	Telewizja Polsat Sp. z o.o. (‘Polsat Cafe’)	Granting a licence for 10 more years
14.	616/K/2024-T	TVN S.A. (‘TVN STYLE’)	Granting a licence for 10 more years
15.	622/K/2024-T	TVN S.A. (‘TVN Fabuła’)	Granting a licence for 10 more years
16.	623/K/2024-T	TVN S.A. (‘TVN International Extra’)	Granting a licence for 10 more years
17.	DR-21/2024	CANAL+Polska S.A. (‘Strefa Abonenta’)	Revocation of a licence at the request of the broadcaster

18.	DR-112/2024	CANAL+Polska S.A. (‘CANAL+ 360’)	Revocation of a licence at the request of the broadcaster
19.	DR-11/2024	Telewizja Polsat Sp. z o.o. (‘Polsat News 2’)	Discontinuation of proceedings concerning the programme name change
20.	DR-55/2024-2/737	Golf Zone Sp. z o.o. (‘GOLF ZONE’)	Programme name change (formerly: ‘Golf Channel Polska’)
21.	DR-56/2024-1/575/K	Telewizja Polsat Sp. z o.o. (‘Polsat Sport 1’)	Programme name change (formerly: ‘Polsat Sport’)
22.	DR-57/2024-1/206/K	Telewizja Polsat Sp. z o.o. (‘Polsat Sport 2’)	Programme name change (formerly: ‘Polsat Sport EXTRA’)
23.	DR-58/2024-2/667	Telewizja Polsat Sp. z o.o. (‘Polsat Sport 3’)	Programme name change (formerly: ‘Polsat Sport News’)
24.	DR-113/2024-3/382/K	CANAL+ Polska S.A. (CANAL+ 360’)	Programme names change and structure (formerly: ‘Canal+Family’)
25.	DR-101/2024-1/670/K	TVS Sp. z o.o. (‘TVS’)	Programme structure change
26.	DR-164/2024-1/623	R.D.F. Entertainment Sp. z o.o. (‘Active Family’)	Programme structure change
27.	DR-46/2024-5/643	TV Spektrum Sp. z o.o. (‘Eska ROCK TV’)	Transfer of rights from the company Music TV Sp. z o.o.
28.	DR-47/2024-4/656	TV Spektrum Sp. z o.o. (‘ESKA TV EXTRA’)	Transfer of rights from the company Music TV Sp. z o.o.
29.	DR-49/2024-4/567	TV Spektrum Sp. z o.o. (‘Vox Music TV’)	Transfer of rights from the company Polo TV Sp. z o.o.
30.	DR-50/2024-1/557/K	TV Spektrum Sp. z o.o. (‘Vox Music TV’)	Transfer of rights from the company Polo TV Sp. z o.o.
31.	DR-51/2024-5/215/K	TV Spektrum Sp. z o.o. (‘Polsat News Polityka’)	Transfer of rights from the company Superstacja Sp. z o.o.
32.	DR-121/2024	Stopklatka S.A. (‘Stopklatka’)	Consent to transfer of rights to the company Kino Polska TV S.A.

Source: KRRiT Office

Attachment No. 9 List of new licences issued in 2024 and licences granted for the next period for the distribution of programmes on cable networks (i.e. telecommunications networks other than those used for terrestrial or satellite broadcasting)

No.	Licence No.	Broadcaster's name (Program name)	Decision type
1.	861/2024-TK	Wirtualna Polska Media S.A. (Kabaret tv)	New licence
2.	865/2024-TK	Wirtualna Polska Media S.A. (Patronite Travel)	New licence
3.	866/2024-TK	Master Pro Sp. z o.o. (TV MASTER)	New licence
4.	867/2024-TK	Telkab Sp. z o.o. (Telewizja Tetka Tczew)	New licence
5.	874/2024-TK	Spółdzielnia Mieszkaniowa w Grudziądzu (TVSM)	New licence
6.	875/2024-TK	TVL Sp. z o.o. (TVREGIONALNA24.PL)	New licence
7.	876/2024-TK	Fundacja Telewizji Teletop Sudety Pro Harmonia (Teletop Sudety)	New licence
8.	877/2024-TK	Białogardzka Spółdzielnia Mieszkaniowa (Panorama Białogardzka)	New licence
9.	878/2024-TK	Spółdzielnia Mieszkaniowa w Nowym Tomyślu (TVK 'W Obiektywie')	New licence
10.	879/2024	Andrzej Piotr Ploch (Telewizja Lubań)	New licence
11.	880/2024-TK	Dolce Vita TV Sp. z o.o. (Dolce Vita TV)	New licence
12.	882/2024-TK	CANAL+ Polska S.A. (CANAL+ EXTRA 5)	New licence
13.	883/2024-TK	CANAL+ Polska S.A. (CANAL+ EXTRA 6)	New licence
14.	884/2024-TK	CANAL+ Polska S.A. (CANAL+ EXTRA 7)	New licence
15.	887/2024-TK	TEL-KAB Sp. z o.o. (TEL-KAB HD)	New licence
16.	888/2024-TK	Telewizja Lokalna 'Azart-Sat' Sp. z o.o. w Bolesławcu (TV Bolesławiec)	New licence
17.	598/K/2024-TK	'STELLA' Zakład Instalatorstwa Teletelektrycznego Sp. z o.o. (Stella Cable TV)	Licence for the following period
18.	599/K/2024-TK	Elżbieta Zjawiona (Tel-Ka)	Licence for the following period

19.	600/K/2024-TK	Spółdzielnia Mieszkaniowa w Kole (Program Lokalny Spółdzielni Mieszkaniowej w Kole) Local Programme of the Housing Cooperative in Koło	Licence for the following period
20.	605/K/2024-TK	Marek Wojciech Krzemiński (Telewizja Gniezno)	Licence for the following period
21.	611/K/2024-TK	Gmina Kozienice (Kronika Kozienicka)	Licence for the following period
22.	612/K/2024-TK	E-CHO MEDIA Sp. z o.o. (E-CHO TV)	Licence for the following period
23.	618/K/2024-TK	Krzysztof Marian Wencki (TV Kaszuby)	Licence for the following period
24.	619/K/2024-TK	Młodzieżowa Spółdzielnia Mieszkaniowa (Telewizja Toruń)	Licence for the following period
25.	620/K/2024-TK	Gmina Miasto Biłgoraj (Biłgorajska Telewizja Kablowa) (Biłgoraj Cable TV)	Licence for the following period
26.	621/K/2024-TK	Petrus Sp. z o.o. (Studio Petrus)	Licence for the following period
27.	625/K/2024-TK	'TV ASTA' Sp. z o.o. (TV ASTA)	Licence for the following period
28.	626/K/2024-TK	Telewizja Polsat Sp. z o.o. (Polsat 1)	Licence for the following period

Source: KRRiT Office

Attachment No. 10 List of decisions issued in 2024 on changes, at the request of the broadcaster, to licences for the distribution of programmes on TVK networks (telecommunications networks other than those used for terrestrial or satellite broadcasting)

No.	Decision designation	Applicant's name	Decision
1.	DR-1/2024-1/569/2014-TK	Marek Wojciech Krzemiński	Update of operator data in licence 569/2014-TK
2.	DR-6/2024-3/689/2017-TK	JAZZENTERTAINMENTTELEVISION Sp. z o.o.	Transfer of rights from licence 689/2017-TK, granted to Agnieszka Teresa Bania
3.	DR-7/2024-2/814/2021-TK	JAZZENTERTAINMENTTELEVISION Sp. z o.o.	Transfer of rights from licence 814/2021-TK, granted to Agnieszka Teresa Bania
4.	DR-8/2024-1/377/K/2019-TK	Miejski Ośrodek Kultury w Piotrkowie Trybunalskim	Extension of licence 377/K/2019-TK to include the network of operator P4 Sp. z o.o. and deletion of the network of operator UPC Polska Sp. z o.o.
5.	DR-12/2024-8/726/2018-TK	RADIO DISCO Sp. z o.o.	Change of broadcaster name in licence 726/2018-TK from DISCO RADIO Sp. z o.o. to RADIO DISCO Sp. z o.o.
6.	DR-13/2024-8/727/2018-TK	RADIO NUTA Sp. z o.o.	Change of broadcaster name in licence 727/2018-TK from JOŁ RADIO Sp. z o.o. to RADIO NUTA Sp. z o.o.
7.	DR-14/2024-8/728/2018-TK	RADIO MEGA Sp. z o.o.	Change of broadcaster name in licence 728/2018-TK from HELLO RADIO Sp. z o.o. to RADIO MEGA Sp. z o.o.
8.	DR-23/2024-8/626/2015-TK	Red Carpet Media Group S.A.	Change of technical data (in the field of satellite broadcasting) in the licence 626/2015-TK
9.	DR-24/2024-1/567/K/2023-TK	Agnieszka Katarzyna Cybulska	Licence expansion 567/K/2023-TK for additional telecom networks
10.	DR-25/2024-2/260/K/2015-TK	Bogumiła Orzechowska	Licence expansion 260/K/2015-TK for additional telecom networks
11.	DR-26/2024-2/302/K/2017-TK	Andrzej Paweł Kazanowski	Licence expansion 302/K/2017-TK for additional telecom networks
12.	DR-27/2024-1/681/2017-TK	TELEWIZJA SUDECKA Sp. z o.o.	Licence expansion 681/2017-TK for additional telecom networks
13.	DR-28/2024-3/748/2019-TK	Natalia Ryłkiewicz	Licence expansion 748/2019-TK for additional telecom networks
14.	DR-35/2024-2/360/K/2018-TK	HORYZONT TV Słubice Sp. z o.o.	Licence expansion 360/K/2018-TK for additional telecom networks

15.	DR-37/2024-1/265/K/2015-TK	Stowarzyszenie Użytkowników Telewizji Kablowej 'Zachód'	Licence expansion 265/K/2015-TK for additional telecom networks
16.	DR-39/2024-1/680/2017-TK	Jacek Ruda	Licence expansion 680/2017-TK for additional telecom networks
17.	DR-40/2024-1/687/2017-TK	Jan Wiktor Tamiotło	Licence expansion 687/2017-TK for additional telecom networks
18.	DR-41/2024-4/276/K/2016-TK	Tomasz Paweł Sawicki	Extension of licence 276/K/2016-TK to include additional telecommunications networks
19.	DR-42/2024-5/273/K/2016-TK	Artur Czesław Filipkowski	Extension of licence 273/K/2016-TK to include additional telecommunications networks
20.	DR-43/2024-2/831/2022-TK	Jan Tadeusz Jakowski	Extension of licence 831/2022-TK to include additional telecommunications networks
21.	DR-44/2024-1/659/2016-TK	TOYA Sp. z o.o.	Change of program name to 'TV TOYA' within licence 659/2016-TK
22.	DR-60/2024-4/272/K/2016-TK	Danuta Domańska	Extension of licence 272/K/2016-TK to include additional telecommunications networks
23.	DR-61/2024-1/683/2017-TK	Krzysztof Waracki	Extension of licence 683/2017-TK to include additional telecommunications networks
24.	DR-70/2024-2/665/2016-TK	Wielkopolska Telewizja Kablowa Sp. z o.o.	Extension of licence 665/2016-TK to include additional telecommunications networks
25.	DR-71/2024-9/626/2015-TK	Red Carpet Media Group S.A.	Programme change to licence 626/2015-TK (specialisation and minimum programme broadcasting time)
26.	DR-72/2024-1/671/2017-TK	BTV Studio Sp. z o.o.	Extension of licence 671/2017-TK to include additional telecommunications networks
27.	DR-73/2024-1/233/K/2013-TK	Krzysztof Marian Wencki	Extension of licence 233/K/2013-TK to include additional telecommunications networks
28.	DR-74/2024-2/376/K/2019-TK	Krzysztof Henryk Machulski	Extension of licence 376/K/2019-TK to include additional telecommunications networks
29.	DR-75/2024	JAZZENTERTAINMENTTELEVISION Sp. z o.o.	Refusal to transfer powers to another entity
30.	DR-76/2024	JAZZENTERTAINMENTTELEVISION Sp. z o.o.	Refusal to transfer powers to another entity
31.	DR-77/2024-5/801/2020-TK	Red Carpet Media Group S.A.	Amendment to licence 801/2020-TK, regarding the name of the programme (change to 'ViDocTV1'), specialisation and minimum broadcasting time
32.	DR-82/2024-1/389/K/2020-TK	Kamil Ceranowski	Extension of licence 389/K/2020-TK to include additional telecommunications networks
33.	DR-95/2024-1/246/K/2014-TK	Młodzieżowa Spółdzielnia Mieszkaniowa	Extension of licence 246/K/2014-TK to include additional telecommunications networks
34.	DR-102/2024-3/586/2014-TK	TEL-KAB Sp. z o.o.	Transfer of rights from licence 586/2014-TK, granted to TEL-KAB Sp. z

			o.o. Sp.k.
35.	DR-103/2024-2/256/K/2015-TK	'TV ASTA' Sp. z o.o.	Update to licence 256/K/2015-TK list of networks broadcasting the programme
36.	DR-104/2024-2/659/2016-TK	TOYA Sp. z o.o.	Extension of licence 659/2016-TK to include additional telecommunications networks
37.	DR-105/2024	MWE Invest Sp. z o.o.	Refusal to change the name and nature of the programme in licence No. 851/2023-TK
38.	DR-109/2024-2/692/2017-TK	Fratia Sp. z o.o.	Change of programming guidelines and name of the programme to 'WPOLSCE24' (licence 692/2017-TK)
39.	DR-124/2024-4/748/2019-TK	Agencja Reklamy i Promocji 'DAMI' Sp. z o.o.	Transfer of rights from licence 748/2019-TK granted to Natalia Ryłkiewicz
40.	DR-125/2024-2/720/2018-TK	Centrum Kultury im. Józefa Mehoffera w Ropczycach	Extension of licence 720/2018-TK to include another operator's network and deletion of the existing operator
41.	DR-127/2024-2/749/2019-TK	Michał Nieckarz	Extension of licence 749/2019-TK to include additional telecommunications networks
42.	DR-137/2024-3/376/K/2019-TK	Krzysztof Henryk Machulski	Extension the licence 376/K/2019-TK to include another telecommunications network
43.	DR-160/2024-2/680/2017-TK	Jacek Ruda	Deletion from the content of licence 680/2017-TK of the operator network
44.	DR-161/2024-1/820/2021-TK	'Wydawnictwo GM' Sp. z o.o.	Extending the licence 820/2021-TK for further telecommunications networks and deletion of the existing network
45.	DR-162/2024-2/779/2020-TK	ECHO24	Extending the licence 779/2020-TK for further telecommunications networks

Source: KRRiT Office

Attachment No. 11 List of proceedings for granting or extending licences for terrestrial radio broadcasting, conducted in connection with announcements by the Chairman of the National Broadcasting Council, decided by resolution or concluded by a decision in 2024.

No.	Broadcast station location, frequency	Method of resolution
1.	Białystok, f=94.8 MHz	Resolution on granting a licence to the company Białostoccy Miłośnicy Mediów Sp. z o.o.
2.	Łowicz, f=107.0 MHz	Resolution on extending the licence to the company Fundacja Kultury - WYTWÓRNA
3.	Skierniewice, f=89.3 MHz	Resolution on extending the licence to the company Fundacja Kultury - WYTWÓRNA
4.	Suwałki, f=89.4 MHz	Resolution on granting a licence to the company Stowarzyszenie Rozwoju Rozgłośni Radiowej in Elbląg
5.	Tomaszów Mazowiecki, f=88.4 MHz	Resolution on granting a licence to the company Multimedia Sp. z o.o.
6.	Sierpc, f=107.9 MHz	Resolution on extending the licence to the company Fundacja Ananke
7.	Andrychów, f=90.9 MHz	Resolution on granting a licence to the company Miejska Biblioteka Publiczna
8.	Wola near Czerwińsk	Resolution on extending the licence to the company Radio Płońsk Sp. z o.o.
9.	Częstochowa, f=92.4 MHz	Resolution on granting a licence to the company EL RADIO Sp. z o.o.
10.	Bielsko – Biała, f=92,7 MHz	Resolution on extending the licence to the company ALEX MEDIA Sp. z o.o.
11.	Żywiec, f=98.5 MHz	Resolution on extending the licence to the company Radio 90 Sp. z o.o.
12.	Łódź, f=90.8 MHz	Resolution on granting a licence to the company EL RADIO Sp. z o.o.
13.	Porażyn, f=100.4 MHz	Resolution on extending the licence to K2 Win Sp. z o.o.

Source: KRRiT office

Attachment No. 12 List of radio (terrestrial) licences in which technical changes have been made

No.	Licence No.	Broadcaster's name (Programme name)	Decision	Change in population coverage
1.	301/K/2017-R	Prowincja Warszawska Zgromadzenia Najświętszego Odkupiciela (Redemptoryści) (Radio Maryja)	Change in the height of the Istebna radio station antenna. Złoty Gróń (f=101.7 MHz)	0
2.	437/K/2021-R	Eurozet Radio Sp. z o.o. (AntyRadio 106.4 FM)	Change of location and technical parameters of the Będzin radio station (f=89.8 MHz)	86,600
3.	612/2015-R	Fundacja Kultury – WYTWÓRNA (POPradio)	Change in suspension height and antenna characteristics of the radio station in Moszna near Pruszków (f= 92.8 MHz)	-28,600
4.	583/K/2023-R	Twoje Radio Sp. z o.o. (Twoje Radio)	Change of location of the Goleniów radio station (f=101.0 MHz)	-4,200
5.	330/K/2018-R	Radio Toruń Sp. z o.o. (ESKA2 Toruń)	Change in antenna suspension height and antenna characteristics of the Toruń radio station (f= 96.7 MHz)	16,000
6.	502/K/2021-R	Radio ESKA S.A. (ESKA Toruń)	Change in antenna suspension height and antenna characteristics of the Toruń radio station (f= 96.7 MHz)	13,300
7.	278/K/2016-R	Radio Muzyka Fakty Grupa RMF Sp. z o.o. sp.k. (RMF FM)	Temporary relocation of the radio broadcasting station from Polkowice to Jakubów (88.2 MHz)	0
8.	678/201/-R	Stowarzyszenie 'Ruska Bursa' (Lem.fm)	Temporary relocation of the radio broadcasting station from Polkowice to Jakubów (103.8 MHz)	0
9.	566/K/2023-R	Radio ELKA Sp. z o.o. (Radio ELKA ZAGŁĘBIA MIEDZIOWEGO)	Temporary relocation of the radio broadcasting station from Polkowice to Jakubów (98.3 MHz)	0
10.	505/K/2021-R	Diocese of Legnica (Radio Plus Legnica)	Temporary relocation of the radio broadcasting station from Polkowice to Jakubów (102.6 MHz)	0
11.	829/2022-R	Radio Leliwa Sp. z o.o. (Radio Leliwa)	Change in power of the Stalowa Wola radio station (f=93.5 MHz)	-2,200

12.	291/K/2016-R	Radio 5 Elk Bajer Sp. j. (Radio 5)	Change in technical parameters of the Elk radio station (f=102.6 MHz)	9,700
13.	485/K/2021-R	Radio Weekend Sp. z o.o. (WEEKEND FM)	Change of location and technical parameters of the Sępólno Krajeńskie radio station (f=92.6 MHz)	19,100
14.	527/K/2022-R	Muzo.fm Sp. z o.o. (Eska ROCK)	Change of location of Bydgoszcz radio station (f=90.5 MHz)	21,100
15.	570/K/2023-R	INFORADIO Sp. z o.o. (TOK FM – Pierwsze Radio Informacyjne)	Change of location of Elbląg radio station (f=89.2 MHz)	13,800
16.	334/K/2018-R	ESKA ROCK S.A. (VOX FM)	Change of location of the Gdańsk radio station (f=104.4 MHz) decision revoked	0
17.	523/K/2022-R	Stowarzyszenie Ziemia Pucka (Radio KASZĘBĚ)	Change of location of the Chojnice station (f=100.7 MHz)	-2,300
18.	862/2024-R	Białostoccy Miłośnicy Mediów Sp. z o.o. (Radio NA STOKU 94.8 FM)	Change in technical parameters of the Białystok station (f=94.8 MHz)	-11,300
19.	855/2023-R	Twoja Telewizja Morska Sp. z o.o. (Norda FM Słupsk)	Zmiana lokalizacji stacji Słupsk (f=87.6) MHz	-13,700
20.	836/2023-R	Mariusz Kaszubski (LPU FM)	Change of location of the Puławy radio station (f=105.8 MHz)	26,400
21.	839/2023-R	Marcin Marzec (Radio 92.9)	Change of location of the Lublin radio station (f=92.9 MHz)	151,600
22.	705/2018-R	Radio Bartoszyce Sp. z o.o. (Radio Bartoszyce)	Change of location of the Bartoszyce radio station (f=90.9 MHz)	2,800

Source: KRRiT office

Attachment No. 13 List of licences for radio programmes broadcast in the DAB+ standard (as of the end of 2024)

No.	Licence No.	Name of broadcaster (name of programme)	Programme character
1.	527/K/2022-R	Muzo.fm Sp. z o.o. (muzo.fm)	Specialised informational-business-music offer
2.	517/K/2022-R	RADIO ELKA Sp. z o.o. (Radio ELKA)	Universal
3.	484/K/2021-R	Diecezja Tarnowska (RDN Małopolska)	Social-religious offer
4.	394/K/2020-R	MFM Sp. z o.o. (KOLOR 103 FM)	Universal
5.	774/2020-R	Polskie Lokalne Media Sp. z o.o. (Radio Toruń)	Universal
6.	772/2020-R	Emanio Arcus Foundation (Bezpieczna Podróż)	Universal
7.	770/2020-R	Czesław Chlewicki IMPERIUM MEDIA Sp. z o.o. (Radio IMPERIUM)	Universal
8.	768/2020-R	Emanio Arcus Foundation (Bezpieczna Podróż)	Universal
9.	766/2020-R	Emanio Arcus Foundation (Bezpieczna Podróż)	Universal
10.	764/2020-R	Emanio Arcus Foundation (Bezpieczna Podróż)	Universal
11.	761/2020-R	Emanio Arcus Foundation (Bezpieczna Podróż)	Universal
12.	758/2019-R	Emanio Arcus Foundation (Bezpieczna Podróż)	Universal
13.	756/2019-R	TRENDY MEDIA M. MIKOŚ Sp. j. (Trendy Radio)	Universal
14.	755/2019-R	Emanio Arcus Foundation (Bezpieczna Podróż)	Universal
15.	351/K/2018-R	Częstochowa Archidiecezja (KATOLICKIE RADIO FIAT)	Social-religious offer
16.	728/2018-TK	HELLO RADIO Sp. z o.o. (Radio Mega)	Specialised music- cultural offer
17.	727/2018-TK	JOŁ RADIO Sp. z o.o. (Radio Nuta)	Specialised music- cultural offer

No.	Licence No.	Name of broadcaster (name of programme)	Programme character
18.	726/2018-TK	DISCO RADIO Sp. z o.o. (Radio Disco)	Specialised music-cultural offer
19.	333/K/2018-R	Klasztor OO. Paulinów Jasna Góra – Częstochowa (Radio Jasna Góra)	Social-religious offer
20.	328/K/2018-R	Radio LELIWA Sp. z o.o. (Radio Leliwa)	Universal
21.	682/2017-R	PROFETO.PL FOUNDATION - Sercański Sekretariat Na Rzecz Nowej Ewangelizacji (Radio Profeto)	Social-religious offer
22.	295/K/2016-R	RADIO EXPRESS 92.3 FM Sp. z o.o. (EXPRESS FM)	Universal
23.	651/2016-R	PI KWADRAT Piekarski & Pietrzak Sp. z o.o. (Wasze Radio FM)	Universal

Source: KRRiT office

Attachment No. 14 List of licences for radio programmes broadcast in the DAB+ standard revoked at the request of the broadcaster in 2024.

No.	Licence no.	Name of broadcaster (name of programme)	Programme character
1.	788/2020-R*	LOCTRA Sp. z o.o. (KONIN FM)	Universal
2.	773/2020-R	OPEN FM Sp. z o.o. (WP Radio)	Specialised music offer
3.	769/2020-R	OPEN FM Sp. z o.o. (WP Radio)	Specialised music offer
4.	767/2020-R	OPEN FM Sp. z o.o. (WP Radio)	Specialised music offer
5.	762/2020-R	OPEN FM Sp. z o.o. (WP Radio)	Specialised music offer
6.	759/2019-R	OPEN FM Sp. z o.o. (WP Radio)	Specialised music offer
7.	757/2019-R	OPEN FM Sp. z o.o. (WP Radio)	Specialised music offer

* Licence revoked only in respect of broadcasting in the DAB+ standard

Source: KRRiT office

Attachment No. 15 List of decisions on granting terrestrial radio licences for the following period

No.	Decision date	Licence no.	Name of broadcaster (name of programme)
1.	18.01.2024	595/K/2024-R	Radio 'TOP' Sp. z o.o. (('Radio FAMA 104.1 FM'))
2.	12.02.2024	601/K/2024-R	Ośrodek Kultury Gminy Grodzisk Mazowiecki (('Radio Bogoria'))
3.	26.02.2024	604/K/2024-R	Eurozet Radio Sp. z o.o. (('CHILLI ZET Katowice' and 'CHILLI ZET'))
4.	29.03.2024	606/K/2024-R	Grupa Radiowa Agory Sp. z o.o. (('Złote Przeboje ELITA 92.1 FM'))
5.	29.03.2024	607/K/2024-R	Radio 'AS' Sp. z o.o. (('Meloradio Inowrocław'))
6.	17.04.2024	609/K/2024-R	Grupa Radiowa Agory Sp. z o.o. (('Twoje Radio Złote Przeboje'))
7.	23.05.2024	613/K/2024-R	Gościniec Wrzesiński Sp. z o.o. (('Radio Warta FM'))
8.	06.06.2024	614/K/2024-R	Kablomedia Sp. z o.o. (('Radio Impuls'))
9.	08.08.2024	617/K/2024-R	Grupa Radiowa Agory Sp. z o.o. (('Radio Złote Przeboje 93.2 FM'))
10.	04.12.2024	624/K/2024-R	Grupa Radiowa Agory Sp. z o.o. (('Radio Złote Przeboje 92.8 FM'))
11.	30.12.2024	627/K/2024-R	International Communication Sp. z o.o. (('ESKA 2 Trójmiasto'))

Source: KRRiT office

Attachment No. 16 List of entities to which the amount due under a decision granting or amending a licence has been divided into instalments (pursuant to Article 40(10) of the Broadcasting Act)

Lp.	Name of broadcaster (name of programme)	Content of the decision
1.	RADIO TOP Sp. z o.o. (Radio FAMA 104.1 FM)	Spreading the fee of PLN 17,556 over 10 instalments for decision No. 595/K/2024-R
2.	RED CARPET TV Sp. z o.o. (ViDocTV)	Spreading the fee of PLN 17,852,161 over 10 instalments for decision No. 859/2024-T
3.	Telewizja POLSAT Sp. z o.o. (Polsat News 2)	Spreading the fee of PLN 13,796 over 10 instalments for decision No. 603/K/2024-T
4.	Białostoccy Miłośnicy Mediów Sp. z o.o. (Radio NA STOKU 94.8 FM)	Payment in 3 instalments of PLN 85,829 for decision No. 862/2024-R
5.	GRUPA RADIOWA AGORY Sp. z o.o. (Złote Przeboje ELITA 92.1 FM)	Spreading the fee of PLN 179,461 over 10 instalments for decision No. 606/K/2024-R
6.	Radio AS Sp. z o.o. (Meloradio Inowrocław)	Spreading the fee of PLN 43,695 over 10 instalments for decision No. 607/K/2024-R
7.	Telewizja POLSAT Sp. z o.o. (Disco Polo Music)	Spreading the fee of PLN 13,796 over 10 instalments for decision No. 608/K/2024-T
8.	GRUPA RADIOWA AGORY Sp. z o.o. (Twoje Radio Złote Przeboje)	Spreading the fee of PLN 76,466 over 10 instalments for decision No. 609/K/2024-R
9.	Telewizja POLSAT Sp. z o.o. (Polsat Cafe)	Spreading the fee of PLN 13,796 over 10 instalments for decision No. 610/K/2024-T
10.	Gościniec Wrzesiński Sp. z o.o. (Radio Warta FM)	Spreading the fee of PLN 65,152 over 10 instalments for decision No. 613/K/2024-R
11.	Telewizja Republika S.A. (Republika)	Spreading the fee of PLN 17,852,161 over 10 instalments for decision No. 873a/2024-T
12.	Fratrria Sp. z o.o. (wPOLSC24)	Spreading the fee of PLN 17,852,161 over 10 instalments for decision No. 873b/2024-T
13.	GRUPA RADIOWA AGORY Sp. z o.o. (Radio Złote Przeboje 93.2 FM)	Spreading the fee of PLN 109,627 over 10 instalments for decision No. 617/K/2024-R
14.	Kaszubski Mariusz (LPU FM)	Payment in 3 instalments of PLN 4,214 for decision No. DR-141/2024-1/836
15.	Marzec Marcin (Radio 92.9)	Payment in 5 instalments of PLN 29,455 for decision No. DR-156/2024-1/839
16.	GRUPA RADIOWA AGORY Sp. z o.o. (Radio Złote Przeboje 92.8 FM)	Spreading the fee of PLN 134,206 over 10 instalments for decision No. 624/K/2024-R
17.	Telewizja POLSAT Sp. z o.o. (Polsat 1)	Spreading the fee of PLN 2,762 over 10 instalments for decision No. 626/K/2024-TK
18.	Radio Bartoszyce Sp. z o.o. (Radio Bartoszyce)	Payment in 3 instalments of PLN 351 for decision No. DR-172/2024-3/705

Attachment No. 17 List of proceedings concerning relief applied under the Public Finance Act

No.	Decision or Resolution No.	Name of broadcaster (programme name)	Type of deferral
1.	DR-67/2024-1/358/K	Białoruskie Centrum Informacyjne Sp. z o.o. (' <i>Białoruskie Radio Racja</i> ') ('Belarus Radio Station')	Splitting the outstanding sixth instalment resulting from decision 358/K/2018-R into two instalments
2.	DR-94/2024-9/739	Radio WNET Sp. z o.o. ('Radio WNET')	Deferral of the payment deadline for the outstanding seventh instalment resulting from decision No.739/2018-R
3.	DR-98/2024-3/513/K	Radio OKO Sp. z o.o. ('Radio OKO')	Spread over 8 instalments, remaining instalments (III – V) payable pursuant to decision 513/K/2021-R
4.	DR-118/2024-1/555/K	Ewa Maria Błachowiak ('RADIO GNIEZNO')	Spreading the second instalment of the fee resulting from decision 555/K/2023-R into four instalments
5.	DR-142/2024	Emanio Arcus Foundation (' <i>Bezpieczna Podróż</i> ') ('Safe Journey')	Refusal to spread the fourth instalment into 24 instalments pursuant to decisions: 764/2020-R, 766/2020-R, 768/2020-R, 772/2020-R
6.	DR-143/2024	Emanio Arcus Foundation (' <i>Bezpieczna Podróż</i> ') ('Safe Journey')	Refusal to remit instalments resulting from decisions: 755/2019-R, 758/2019-R, 761/2020-R, 764/2020-R, 766/2020-R, 768/2020-R, 772/2020-R
7.	DR-144/2024	Emanio Arcus Foundation (' <i>Bezpieczna Podróż</i> ') ('Safe Journey')	Discontinuation of proceedings regarding the division into 24 instalments of the fourth instalment resulting from decisions no.: 755/2019-R, 758/2019-R, 761/2020-R
8.	Resolution No. 229/2024	Diocese of Gliwice	Leaving a request for remission of tax arrears unresolved

Source: KRRiT office

Attachment No. 18 List of decisions on programme changes in licences for terrestrial radio broadcasting (name changes or other programme changes).

Lp.	Name of broadcaster (name of programme, licence no.)	Content
1.	Radio Rekord FM S.A. ('Radio Rekord', 830/2022-R)	Change of name from 'Radio Rekord Kielce' to 'Radio Rekord'
2.	WPP Media Sp. z o.o. ('Włocławek', 817/2021-R)	Change of programme name from 'Włocławek po polsku' to 'Włocławek'
3.	GRUPA RADIOWA AGORY Sp. z o.o. ('Radio Złote Przeboje 103.6 FM', 719/2018-R)	Refusal to exclude the holiday period (i.e. July and August) from the calculation of local content in the programme
4.	Muzo.fm Sp. z o.o. ('Eska ROCK', 527/K/2022-R)	Change of programme name from 'muzo.fm' to 'Eska ROCK'
5.	Nadawca Sp. z o.o. ('ESKA ROCK Warszawa', 363/K/2019-R)	Change of programme name from 'ESKA ROCK' to 'Eska ROCK Warszawa'
6.	Radio Bartoszyce Sp. z o.o. ('Radio Bartoszyce', 705/2018-R)	Change of name from 'ESKA Bartoszyce' to 'Radio Bartoszyce'
7.	Radio CCM Sp. z o.o. ('ESKA Południe', 480/K/2021-R)	Change of name of the programme 'Radio CCM' to 'ESKA Południe'
8.	Radio ESKA S.A. ('ESKA Ostrzeszów', 620/2015-R)	Refusal to exclude the holiday period (i.e. July and August) from the calculation of local content in the programme
9.	Radio ESKA S.A. ('ESKA Kraśnik', 723/2018-R)	Refusal to exclude the holiday period (i.e. July and August) from the calculation of local content in the programme
10.	Stowarzyszenie Rozwoju Rozgłośni Radiowej w Elblągu ('ESKA Braniewo', 746/2019-R)	Refusal to exclude the holiday period (i.e. July and August) from the calculation of local content in the programme
11.	MCC GROUP Sp. z o.o. ('Radio FEST', 362/K/2019-R)	Refusal to waive the mandatory inclusion of Christian music in the programme
12.	Radio GO Sp. z o.o. ('VOX FM Gorzów', 595/2015-R)	Refusal to exclude the holiday period (i.e. July and August) from the calculation of local content in the programme
13.	Radio ESKA S.A. ('Eska 106.6', 343/K/2018-R)	Refusal to exclude the holiday period (i.e. July and August) from the calculation of local content in the programme
14.	Radio ESKA S.A. ('ESKA Siedlce', 321/K/2018-R)	Refusal to exclude the holiday period (i.e. July and August) from the calculation of local content in the programme
15.	Radio REKORD FM S.A. ('RADIO REKORD Mazowsze', 753/2019-R)	Refusal to reduce the proportion of spoken language and local topics in the programme

Source: KRRiT Office

Attachment No. 19 Detailed information on the number of subscribers in 2024

According to the records of *Poczta Polska* (the Polish Post), as at 31 December 2024, there were 4,742,300 subscribers registered, including 238,100 institutional subscribers:

- subscribers using a television or radio and television receiver – 4,503,300;
- subscribers using a radio receiver – 239,000. In 2024, compared to the previous year, there was:
 - a decrease of 21,400 in the number of subscribers – natural persons;
 - a decrease of 5,500 in the number of institutional subscribers.

The number of subscribers with registered radio and television receivers decreased by 26,900. In addition, there was an increase of 94,700 in the number of subscribers exempt from subscription fees.

Out of 12,500,000 households in Poland, ¹⁶⁵ 92.7% have television receivers.¹⁶⁶ As of 31 December 2024, ¹⁶⁷ registered radio and television receivers were held by:

- 4,504,200 (38.8%) households in Poland, of which:
 - 2,585,900 (57.8%) subscribers were exempt from paying fees.

The remaining 2,156,400, including 1,918,300 households and 238,100 institutional subscribers, should pay their fees on time.

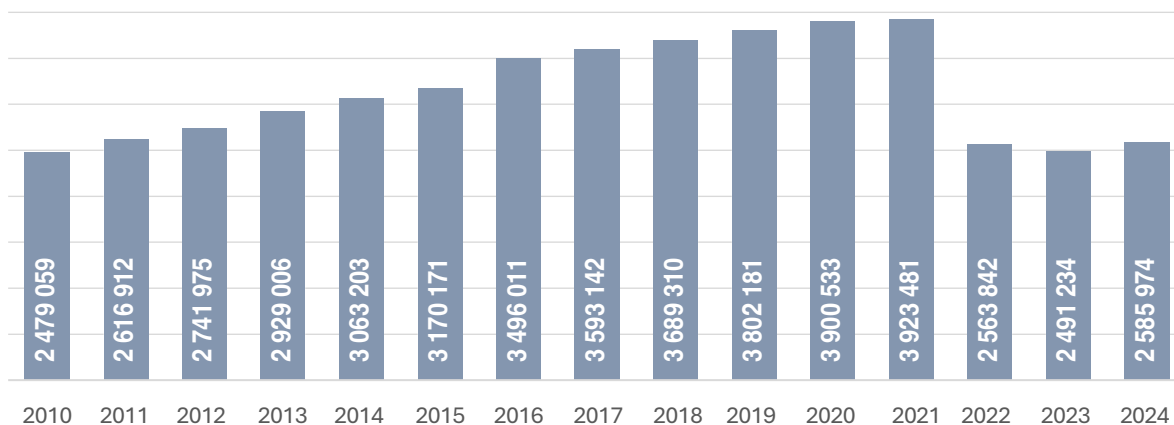
At the end of 2024, only 691,900 of those liable (32%) had paid their fees, including 453,800 households and 238,100 institutional subscribers.

¹⁶⁵ According to data from the Central Statistical Office, based on the 2021 census.

¹⁶⁶ According to data from the founding study of the National Media Institute (*KiM*), 2024.

¹⁶⁷ See the report of *Poczta Polska*: I.9 Report on the number of radio and television subscribers as of 31 December 2024.

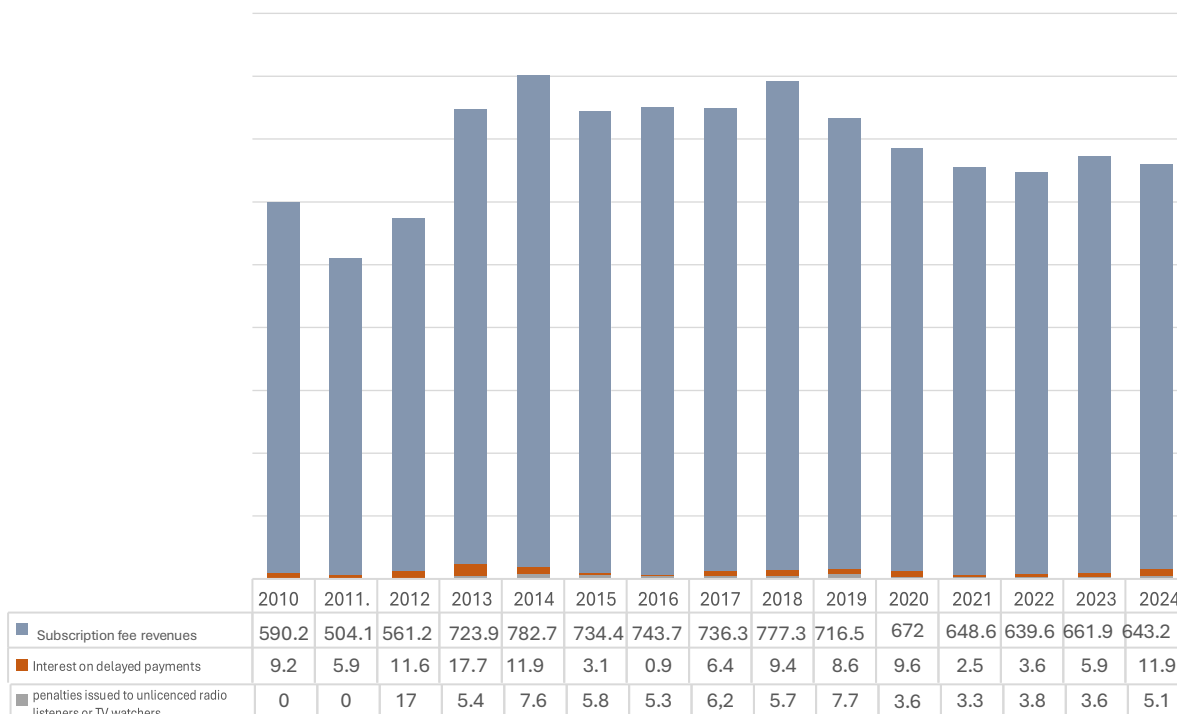
Attachment No. 20 Number of persons exempt from paying subscription fees in the years 2010–2024



Source: based on a report by Poczta Polska I.9 Report on the number of radio and television subscribers in 2024.

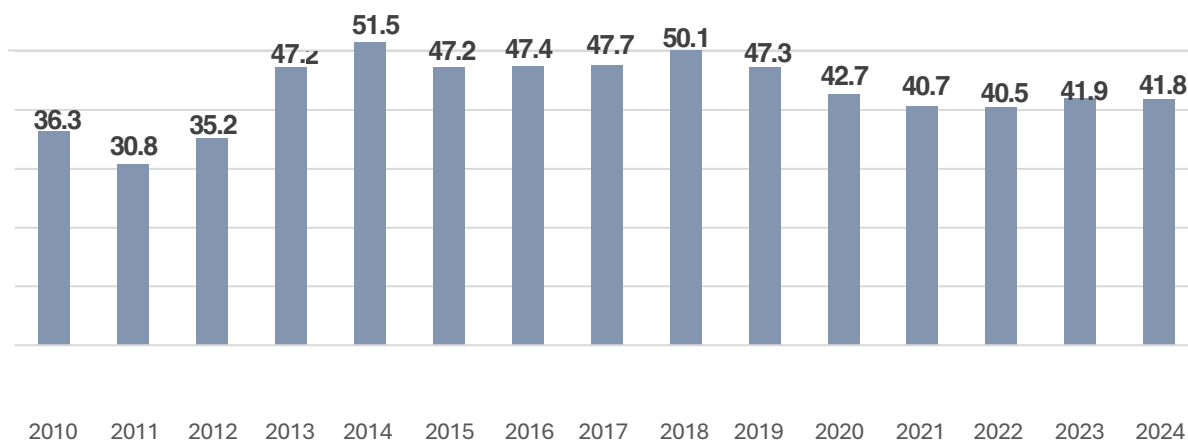
Attachment No. 21 Subscription and non-subscription revenues in 2010-2024

(in million of PLN)



Attachment No. 22 *Poczta Polska* (Polish Post) – commission charged in 2010–2024

(in million PLN)



Source: KRRiT Office based on monthly reports from Poczta Polska (Polish Post): 'Summary of fees collected for the use of radio or television receivers for a given month, with partial breakdowns by province' for the years 2010-2024.

Attachment No. 23 Budget revenue execution for the period from 1 January to 31 December 2024.

Contents	Financial plan for 2024	Executed	Difference	%
			col. 3-2	col. (3:2)
	In thousands of PLN			
1	2	3	4	5
In total part 09 - KRRiT, including:	44,380	61,296.1	16,916.1	138.1%
Section 751, Chapter 75101 Offices of the supreme authorities of the state, control and law enforcement	44,380	61,296.1	16,916.1	138.1%
§0570 Revenue from fines, penalties and other monetary penalties imposed on physical persons	0	57.4	57.4	0.0%
§0580 Revenue from fines, penalties, and other monetary penalties imposed on legal persons and other organizational units	300	1,270.3	970.3	423.4%
§0590 Revenue from fees for concessions and licenses	37,360	53,571.6	16,211.6	143.4%
§0630 Revenue from fees and court costs and other fees paid to the State Treasury in connection with court or prosecutor proceedings	30	48.8	18.8	162.5%
§0640 Revenue from enforcement costs, bailiff fees, and reminder costs	1	1.3	0.3	131.7%
§0690 Revenue from various fees, including: - fees for entries in the register of programs distributed and programs distributed exclusively in the teleinformation system, - reimbursement of administrative costs,	280	327.0	47.0	116.8%
§0870 Revenue from the sale of assets	0	0.2	0.2	0.0%
§0880 Revenue from extension fees	6,326	5,749.3	- 576.7	90.9%

Contents	Financial plan for 2024	Execution	Difference	%
			col. 3-2	col. (3:2)
	In thousands of PLN			
1	2	3	4	5
§0910 Interest income from non-due payments of taxes and fees	80	189.9	109.9	237.4%
§0920 Other interest	0	1.0	1.0	0.0%
§0940 Income from settlements/refunds from previous years	0	14.9	14.9	0.0%
§0950 Income from penalties and damages resulting from contracts	1	63.9	62.9	6,392.7%
§0970 Income from miscellaneous revenues, including: - income from remuneration to the payer for performing tasks specified by law	2	0.5	- 1.5	24.5%

Source: KRRiT office

Attachment No. 24 Execution of budget expenditures of the National Broadcasting Council broken down by sections and items within sections for the period from 1 January to 31 December 2024.

§§	Financial plan after revisions	Execution	% Col. 4:2
1.	2.	3.	4.
TOTAL BUDGET EXPENDITURE Section 751, Chapter 75101, of which:	91,164.0	86,408.6	94.8%
1. Benefits for individuals, of which:	118.0	32.3	27.4%
§ 3020 Personnel expenses not included in salaries	115.0	32.0	27.8%
§ 3030 Miscellaneous expenses for individuals	3.0	0.3	10.0%
2. Current expenses of budgetary units, of which:	89,036.0	85,898.9	96.5%
§ 4010 Employee remuneration	19,414.3	19,383.1	99.8%
§ 4040 Additional annual remuneration	963.7	963.7	100.0%
§ 4110 Social security contributions	3,562.0	3,185.8	89.4%
§ 4120 Contributions to the Labor Fund and Solidarity Fund	508.0	334.3	65.8%
§ 4140 Contributions to the State Fund for Rehabilitation of Disabled Persons	159.0	158.0	99.4%
§ 4710 Contributions to the Employee Capital Plan financed by the employer	244.0	221.6	90.8%
§ 4000 Current expenditure of the entity, including:	60,724.0	59,055.2	97.3%
1) § 4210 Purchase of materials and equipment	1,986.0	1,589.0	80.0%
2) § 4220 Purchase of food	75.0	50.6	67.5%
3) § 4260 Purchase of energy	499.0	376.7	75.5%
4) § 4280 Purchase of health services	20.0	12.2	61.0%
5) § 4300 Purchase of other services	54,613.0	53,977.2	98.8%
6) § 4360 Fees for the purchase of telecommunications services	218.0	169.6	77.8%

	7) § 4380 Purchase of translation services	97.0	66.8	68.9%
	8) § 4390 Purchase of services involving expert opinions, analyses and opinions	424.0	156.2	36.8%
	9) § 4400 Administration fees and rent for buildings, premises and garage spaces	2,792.0	2,656.9	95.2%

§ 4090 Salaries	3.0	-	0.0%
§ 4170 Impersonal remuneration	1,005.0	762.6	75.9%
§ 4190 Competition prizes	250.0	60.5	24.2%
§ 4270 Purchase of remodeling/repair services	456.0	313.0	68.6%
§ 4410 Domestic business trips	143.0	44.3	31.0%
§ 4420 Foreign business trips	300.0	235.7	78.6%
§ 4430 Miscellaneous fees and contributions	76.0	72.0	94.7%
§ 4440 Write-offs to the company social benefits fund	401.0	390.3	97.3%
§ 4480 Property tax	13.0	11.5	88.5%
§ 4520 Fees to the budget of local government units	211.0	210.3	99.7%
§ 4540 Contributions to international organisations	374.0	346.7	92.7%
§ 4580 Remaining interest	5.0	0.3	6.0%
§ 4610 Costs of court proceedings and prosecution	95.0	55.8	58.7%
§ 4700 Training for employees who are not members of the civil service	129.0	93.9	72.8%
§ 4990	-	0.3	0.0%
3. Capital expenditure	2,010.0	477.4	23.8%
§ 6060 Expenditure on investment purchases by budgetary units	2,010.0	477.4	23.8%

Source: KRRiT office