

# საქართველოს ახალგაზრდა იურისტთა ასოციაცია GEORGIAN YOUNG LAWYERS' ASSOCIATION



## Comments of nongovernmental and media organizations on the draft Strategy and Action Plan for the Development of Media Literacy

We appreciate the importance of the initiative to create a legislative framework for the development of media literacy in Georgia and the willingness of the Georgian National Communications Commission (GNCC) to cooperate with various organizations in the development and implementation of the media literacy strategy.

At the same time, we express our concern about the neglect of fundamental rules in the process of drafting the Strategy and Action Plan for the Development of Media Literacy. In particular:

- The process of drafting was not inclusive and a team working on the Strategy failed to consult all interested parties;
- Part 2 of the draft Strategy (Environment and Political Context) describes international instruments alone and fails to reflect the situation in Georgia; this provides the ground to assume that the authors did not study the documents

determining the domestic policy, expertise and researches to identify the problems;

- The projects implemented in the area of media literacy and their specific characteristics were not audited either to identify the needs.

Consequently, the draft strategy fails to fully reflect the challenges and needs faced by Georgia today and offers such narrow understanding of media literacy, which is devoid of local context.

In our view, the document must give proper consideration to the following important issues:

- Strategic goals must correspond to the challenges reflected in the policy documents of the government of Georgia. In particular, the 2017-2020 Government Strategy on Georgia's EU and NATO Integration [Communications](#), as well as the National Cyber Security Strategy of Georgia for **2017-2018**, identifies the hybrid war waged by Russia as a key threat to Georgia, which includes propaganda and cyber-attacks from Russia as integral components of this war;

- A greater deal of attention must be paid to a target audience (regions with compact settlements of ethnic minorities) who, on the one hand, does not have access to Georgian information channels because of the language barrier and on the other hand, is the most active user of information channels of the Russian Federation, according to NDI surveys;

- Considering the problem of the use of hate speech in media and public discourse, the document must emphasize the importance of developing special programs in this area and the role of GNCC in this process, which must be focused on the establishment of effective self-regulation mechanisms;

- Considering an important role of schools in the development of critical thinking among schoolchildren, media literacy must be included in a school curriculum not only as an interdisciplinary competence but also as a mandatory subject.

We also believe that the list of participants must be extended:

- It is important to establish cooperation and coordination with the Data Exchange Agency on the issues of cybersecurity, and with the Office of the Personal Data Protection Inspector on the issues of personal data;

- It is also important to widen a circle of research organizations to be engaged in this process as well as the circle of those nongovernmental organizations that work on media and propaganda issues and have not so far been given a possibility to participate in discussions or have access to the public version of the document.

Discussion of the document in a narrow circle and in a speedy manner, as well as the lack of short-, medium- and long-term objectives will not favor the adoption of effective strategy and action plan for media literacy. Therefore, we call on the GNCC to undertake a fundamental review of the document and to develop, with the involvement of all interested parties, such a document that, along with the international practice, will reflect local needs and context too.

Media Development Foundation (MDF)

Network of Information Centers

Transparency International Georgia (TI)

Georgian Young Lawyers' Association (GYLA)

The Georgian Charter of Journalistic Ethics

Journalism Resource Center (JRC)

Studio "Monitor"

Baltic to Black Sea Alliance - Georgia