



Journalism Ethics Revisited: A Comparison of Ethics Codes in Europe, North Africa, the Middle East, and Muslim Asia

KAI HAFEZ

Formal journalism ethics, as laid out in codes of ethics by journalism associations and the like, is part of a wider debate on media ethics that has been triggered in the Middle East due to the advent of global media in the region. This study compares journalism codes from Europe and the Islamic world in order to revisit the widespread academic assumption of a deep divide between Western and Oriental philosophies of journalism that has played a role in many debates on political communication in the area. The analysis shows that there is a broad intercultural consensus that standards of truth and objectivity should be central values of journalism. Norms protecting the private sphere are, in fact, more pronounced in countries of the Near and Middle East, North Africa, and in the majority of Muslim states in Asia than is generally the case in Europe, although the weighing of privacy protection against the public's right to information is today a component of most journalistic codes of behavior in Islamic countries. Obvious differences between the West and many Islamic countries are to be found in the status accorded to freedom of expression. Although ideas of freedom have entered formal media ethics in the Middle East and the Islamic world, only a minority of documents limit the interference into freedom to cases where other fundamental rights (e.g., privacy) are touched, whereas the majority would have journalists accept political, national, religious, or cultural boundaries to their work. Despite existing differences between Western and Middle Eastern/Islamic journalism ethics and in contrast to the overall neoconservative (Islamist) trends in societal norms, formal journalism ethics has been a sphere of growing universalization throughout the last decades.

Keywords ethics codes, journalism ethics, media ethics, Middle East, Muslim Asia, North Africa

There are a number of good reasons for dealing with the ethics of journalism from a comparative perspective of Europe, the Middle East, and the Islamic world. For one, the academic discourse on mass media in Asia, Africa, and Latin America has been mostly confined to questions of media freedom and freedom of expression. Inspired by the—undoubtedly very important—media watch documentations of organizations such as Index on Censorship, Reporters Without Boundaries, and Freedom House, much of what

Kai Hafez is a Research Fellow at the German Institute for Middle East Studies, Hamburg, and Adjunct Professor at the Institute of Political Science at the University of Hamburg.

Address correspondence to Kai Hafez, Deutsches Orient-Institut, Universität Hamburg, Neuer Jungfernstieg 21, 20354 Hamburg, Germany. E-mail: khafez@doi.ih.de

is published about mass media in Asia, Africa, and Latin America reads like a story of continuous repression and intimidation by the state and, at times, by guerilla groups. While the violation of freedom is plain reality and certainly the single most important aspect of any analysis of media development, looking at the media solely from the perspective of state repression turns journalists, newsrooms, news corporations, editors, and all other journalistic workers into objects of the state rather than subjects able to determine or, at least, partly determine their own professional fate (Grossenbacher, 1988, p. 45; Nyamnjoh, 1999, p. 53). This approach implicitly maintains that once the political frame for a free media is established in a country, free expression is the inevitable consequence. Although this is a valuable point of view—the absence of state interference in the media is a necessary prerequisite for the freedom of expression in the media—many limits to public debates in Asia, Africa, and Latin America are rooted in social values and professional norms that cannot be controlled easily by the state. Islamist censorship in many parts of the Middle East, kings and presidents who cannot be criticized in the media, and many other tabuistic features that are sometimes described as the “triangle of religion, sex, and politics” have not been invented by any of today’s state powers. The state is just one actor in a sometimes very long chain of social mechanisms working together to create a specific and very effective ethics of journalism.

There are other important arguments for a debate on journalism ethics. The globalization of media spaces—for instance, Western European TV programs that are available in Saudi Arabia and Iran, among others—creates ethical problems that should be addressed (Christians & Traber, 1997, p. viii). It is not necessary to demand global ethical standards as a prerequisite for global journalism. Ethical debates are also not conservative by nature, since much of the argumentation concerning a Western “cultural invasion,” about TV pornography and immorality flooding the East, overlooks the point that up to this moment we are hardly able to determine the exact condition of societal and professional ethics in many countries of Africa and Asia. Public debates over those issues are vehemently controlled by moral “guardians,” such as religious leaders, who control public communication without necessarily representing the actual morality of the people for whom they intend to speak. In many countries, open ethical debates among journalists and the public have only just begun. In parts of North Africa—Algeria,¹ Morocco (Naanaa, 2000), and Egypt (Teel, Amin, Napoli, & Ezz El Din, 1997)—new codes of journalism ethics have recently been designed or debated. In other countries, such as Iran, journalists are increasingly demanding the codification of norms.

Journalism ethics can be approached from different perspectives. *Formal journalism ethics*, laid down in ethics codes, is merely a part (sometimes not even the most significant part) of views concerning journalism ethics in a certain country. Formal ethics must be discerned from the *informal discourse(s) on journalism ethics* existing in journalism communities and the wider public debate. For example, being critical of one’s own national government could be viewed by many journalists as an important function of their profession, even though the authoritarian political conditions governing their work may not allow the inclusion of such ideas in formal ethical codes. Therefore, it seems important to understand that the following study concentrates on the comparative analysis of formal journalism ethics in professional ethical codes. It seeks to identify spheres where Western codes and codes from the Middle East, North Africa, and Muslim Asia differ and where there is consensus on the values and norms of journalism. This study focuses on politically relevant spheres of journalism ethics rather than on technical questions like identification of sources or the “right to reply.” Analysis is based on a resource pool of codes of conduct that was established for the purpose of

this study² and contains, besides several Western codes, probably the largest collection of codes of conduct from the Islamic world.

Methodology

This study basically agrees with Kaarle Nordenstreng's (1998) "pragmatic" definition of the function of journalism codes as being part of a wider system of quality control of the media. Codes are part of varying media accountability systems that extend from the legal system judging on the basis of binding law, honorary codes, and press councils judging on the basis of ethical codes to training and professional education based on reflections of codes (p. 128). The authority and representative character of codes depend on *who* formulated them and *by which procedure*. The following types of codes can be discerned:

- *single media codes*, designed as guidelines for specific publications (i.e., the Middle East News Association, MENA, or the London-based Arab daily *Al-Hayat* and the magazine *Al-Wasat*)³
- *national official codes*, ratified by governments, government-controlled media councils, or journalism associations lacking democratic legitimacy (cf. the Iraqi code)
- *national independent codes*, formulated by independent professional bodies of journalism (e.g., the code of the Alliance of Independent Journalists, AJI, in Indonesia or Western European codes)
- *regional official codes*, designed by multilateral state institutions (e.g., the Federation of Arab Journalists)
- *multinational codes*, designed by different types of journalistic or other international bodies with more or less autonomy (e.g., the 1954 Declaration of Principles on the Conduct of Journalists of the International Federation of Journalists).

Representation is merely one of a number of methodological questions concerning the comparison of ethical codes of journalism. Thomas W. Cooper (1989) has rightly argued that codes need contextual interpretation and that a straightforward comparison of language, words, and terminology can be misleading, since meaning in different cultural, political, and social contexts can be vastly different (p. 228). Codes therefore need *interpretation*. This, by the way, is not only the case in an international and intercultural context. It is vastly misleading to assume that intercultural interpretation is necessarily more difficult than intracultural or even intranational interpretation, because in the concrete case coded values like "freedom of expression" and "privacy" need to be applied and, sometimes even more important, they need to be balanced against each other. Which value deserves priority: freedom or privacy, truth or social responsibility? Again, we are reminded of Nordenstreng's (1998) pragmatic view of codes as being part of an interpretative discourse within an interactive social system.

Discourses on journalism ethics are complex processes involving actors formulating positions through references to actual or past interpretations of meaning. Ethical reasoning has a *temporal dimension* when relating to contemporary or past, to traditional or modern values, or, what makes the matter more complicated, to what the discourse participant *holds* and *assumes* to be imminent values of society (if he or she is not outright normative in approach). Social reality is a construct, and it is only through discourse itself, through intersubjective ways of agreeing, that we can feel on safer

ground concerning our own perception of past or present values. Especially in the Islamic world, references to “Islamic tradition” or “Islamic values” are very popular among some participants of the discourse on journalism ethics. Muhammad Ayish and Haydar Sadig (1997) differentiate between a “growing mode of communication, rooted in secular grounds” and a “traditional mainstream” embedded in Islamic discourse (p. 120). The authors, however, concede that these ideal types can hardly ever be clearly discerned nowadays, and both strings are intertwined in multiple ways so that a dichotomy of Western modern communication versus Islamic traditional communication is hardly an appropriate way to describe journalism values and ethics, even though a number of Islamic thinkers use that dichotomy (Glass, 2001). Hamid Mowlana (1989), for instance, argues that the idea of responsibility for the community (here, the Islamic *umma*) in public speech is unique to the Muslim world and therefore justifies talk of a distinct Islamic communication ethics (p. 143).

However, such a distinction between Islamic communitarian and Western individualist communication can hardly be upheld. Western theories of the media as a “fourth estate” controlling the government or as “advocates” of the underprivileged are rooted in an understanding of communication as social interaction. Also, that “Islamic communication” is based on the principle of *taqwa* (piety), the belief that human beings have an innate “greatness and dignity” that should not be violated through communicative acts (Mowlana, 1989, p. 144), is very strongly reminiscent of French and German ethical standards and laws protecting personal integrity from media abuses. It will be shown later that there are, in fact, differences in the approach toward “privacy” in Western and non-Western journalism, but the differences are much smaller than a clear-cut distinction between Islam and West would make us believe. Views of the relationship between the ethics of journalism in the West and in the East largely depend on which segments of the complex discourse on ethics in both the West and the Islamic world are compared.

Truth and Objectivity

“Truth,” “accuracy,” and “objectivity” are almost consensual cornerstones of journalism ethics as documented in professional codes. The selection of phrases and passages of either European or Oriental national or multinational codes in Table 1 confirms Thomas W. Cooper’s (1989) observation that the search for truth and objectivity is a universal feature of global media ethics (p. 20). Many of the assembled codes—for instance, the German, Malaysian, and Saudi Arabian codes—emphasize that the journalist’s obligation to report the truth derives from the right of the public to be informed adequately about events and opinions. Factual, correct, and unbiased coverage therefore can be considered a consensual value of journalism that in all codes forms the core and essence of the journalistic profession and distinguishes fiction from nonfiction.

Of course, identical codification does not prove that objectivity, accuracy, and fairness are practiced alike in all countries and media systems; such an assumption would overlook the fact that information control, censorship, and tabloid journalism are widespread and that the possibilities for verification vary from country to country, medium to medium, and journalist to journalist. However, no cultural cleavage can be observed. The codes reveal that the search for truth is a common intercultural norm that is violated by all of those forces within or outside the media systems that try to obstruct it. The possible hypothesis that Islamic countries might not be interested in “truth” and would rather propagate “Islam” as the single truth cannot be verified because even the two

Table 1
Truth and objectivity in journalism codes (selection)

	Phrase or passage
Algeria	“respecter la vérité” (§ 1, Section “Déclaration des devoirs”)
ASEAN	“not to suppress any facts” or improper exaggeration (§4)
Federation of Arab Journalists	“adherence to objective reality and truth”; “correct any published material in case of discovering inaccuracy” (§4)
International Federation of Arab Journalists	“right of the public to truth is the first duty of the journalist” (§1)
Bangladesh	“Truth and accuracy in respect of information available shall be ensured” (§2); “The publication of malicious news is far more immoral than that of wrong news without malicious intent” (§17)
Egypt (1972)	“strict objectivity in whatever we write and publish” (§ 8; Section “Declare”)
Egypt (1983)	“present the facts complete without distortion” (§2/b)
Egypt (1996)	“commitment to the requirements of ethics, reliability and truth” (§1; Section “Duties and Rights”)
Finland	“Truthful, essential and unbiased information” (§8)
Germany	“respect for the truth and accurate informing of the general public” (§1); newspapers and magazines “should also publish views which they do not share themselves” (§1/2)
Italy	“always safeguard the substantial truth of facts” (Section “Sources”);
Malaysia	“report facts accurately and faithfully” and respect the right of the public to the truth (§1, Part 2)
Kyrgystan (June 1997)	“present reality through actual and detailed information”
Kyrgystan (Sept. 1997)	“information which has been confirmed as true” (§1)
Morocco	“rechercher la vérité” (§1)
Pakistan (1993)	“Presentation of news items and comments on events and airing of legitimate grievances should be fair and objective and there should be no wilful departure from facts” (§5)

codes that limit journalists' freedom of expression to Islamic objectives and values—the 1980 Islamic Mass Media Charter of Jakarta and the Saudi Arabian code—demand that journalists present real facts. Therefore, even exceptional countries like Saudi Arabia, whose political systems are completely built on religion (let alone those countries in North Africa and the Middle or Far East that are basically secular states), do not deny that there is something called “facts” out there and demand adherence to factuality and objectivity within the limits of what may be written and spoken.

Privacy and Publicness⁴

Most codes of journalism ethics, whether from Europe, North Africa, the Middle East, or other Asian Islamic countries, contain norms to protect the privacy of persons (Tables 2 and 3). There is an intercultural near-consensus that a private/public dichotomy exists, that there is a private realm of the person and of the family that needs protection. Collectivist approaches demanding a “transparent” citizen, whose private life is subject to complete control by society or by the state, are absent from the codes analyzed here. One of the few codes that does not mention privacy is the Islamic Media Charter of the 1980 Jakarta conference.

Leaving aside the two Islamic codes mentioned, all others are either (a) codes demanding absolute protection of the private sphere (Table 2) or (b) codes demanding protection of the private sphere with exceptions made for higher public interests (Table 3).

The fact that some Arab states only are opting for an absolute protection of privacy seems to support the assumption that the protection of “the principle of human dignity” and “every person’s right to honour and good reputation” is a central value in Arab and Islamic communication ethics in both secular and religious traditions (Ayish & Sadig, 1997, p. 114; Glass, 2001, p. 228). From this point of departure, one could argue that journalism ethics in the Middle East is more privacy oriented, while Western ethics is

Table 2
Privacy in journalism codes (selection)

	Phrase or passage
Algeria	“respecter la vie privée des personnes et leur droit à l’image” (§4, Section “Déclaration des devoirs)
Federation of Arab Journalists	“adhere to respect the right of individuals to privacy and dignity”; “abstain from publishing personal or family scandals aiming to weaken family relations” (§2)
Egypt (1996)	“protect any citizen’s right to privacy of personal life and human dignity” (§4; Section “General Principles”)
Lebanon	respect the “reputation of the individual” and preserve his or her “dignity”; do not “pry into his [or her] private life” (§11)
Kyrgystan (Sept. 1997)	“Television and radio journalists have no right to cover the details of the personal life of an individual without his or her permission” (§4)

Table 3
Privacy and public interest in journalism codes (selection)

	Phrase or passage
ASEAN	“refrain from writing reports which have the effect of destroying the honour or reputation of a private person, unless public interest justifies it” (§8)
Egypt (1972)	do not “publish the photographs of nonpublic figures on other than public occasions without their prior agreement” (§4, Section “Declare”)
Finland	“detrimental facts related to the private life of a person or his family should not be published unless these are of considerable public interest” (§24)
Indonesia (AJI)	“respect the privacy of the individual, except where this is to the detriment of society” (§11)
Italy	“cannot publish news on his private life, unless they are transparent and of relevant public interest”
Kyrgystan (June 1997)	do not “interfere with the private life of a person unless the action seeks to protect the the interests of society”
Norway	“never draw attention to personal or private aspects if they are irrelevant” (§4/3)
Pakistan (1972)	“The right of the individual to protection of his reputation and integrity must be respected and exposure of and comment on the private lives of individuals must be avoided unless this is imperatively in the public interest” (§3)
Spain	“avoid mentioning the names of relatives and friends of persons accused or sentenced of crime, unless it is absolutely necessary” (§5)
Turkey	“private lives of individuals shall not be reported, except when made necessary of public interest” (§5)
United Kingdom (1994)	“subject to the justification by over-riding considerations of the public interest, a journalist shall do nothing which entails intrusion into private grief and distress” (§6)

more publicness oriented. It is tempting to subscribe to this dichotomy, since it seems in tune with many political, social, and cultural differences between the Islamic world and the West. Western countries have advanced democratic systems whose development has been closely connected to the invention of publicness as a discursive sphere of “bourgeois” reasoning free of state control (Habermas, 1993). At the same time, authoritarian

and semi-authoritarian political systems are, first, strong in their desire to sweep much information “under the carpet,” protecting, for example, corrupt politicians by means of a legitimizing ethics of privacy. Second, they are weak in their capability to incorporate private (family, clan, tribal, individual) interests into the social order.

However, a closer look at the codes reveals that the matter is much more complicated than the simple dichotomy of “Oriental privacy” versus “Western publicness” implies. The Algerian “right to one’s own picture” (*droit à l’image*; §4, Sec. “Déclaration des devoirs”) can be interpreted as being influenced by traditional Islamic resistance to having human beings portrayed in pictures, a norm that is especially specific among populations in the Maghreb region of North Africa. On the other hand, the Algerian journalism code can be said to have been influenced by the French media law and tradition, in which photographs of public figures, especially politicians, even when in public but in a private context (e.g., shopping), cannot be reproduced in the press without the person’s prior consent. Mainstream French journalism ethics and law offer the most far-reaching protection of privacy among European countries, which shows that European ethics is not completely on the side of public information interests. Germany, in contrast, and even more so England, values the public’s right to be informed more highly than does France, since no agreement before publication is needed if a person is a public figure (Von Gerlach, 2000; Esser, 2000). In the European Union, harmonization on questions of privacy and publicness is increasingly on the way (Bourgeois & Grosser, 2000).

Also, many Islamic ethical codes (Alliance Southeast Asian Nations [ASEAN], Indonesia, Pakistan 1972, Turkey, Egypt 1972) seek a balance between privacy and publicness, personal protection and public information rights. As documented in Table 3, the moderate approach of many secular ethical codes to matters of privacy and publicness allows for a balanced approach to public persons. Telling journalists that it is *in general* unethical to cover a politician’s personal affairs would be identical to a ban on investigative political reporting, since, for example, corruption, nepotism, and many other things are closely connected to intimate knowledge of a politician’s personal life and circumstances. The coverage of private relations as part of the political process must be allowed, while at the same time protection of personality as a whole—for example, the politician’s role as family father—must be secured. Ethical norms like that of the Kyrgyz code of journalism ethics adopted in September 1997 by the Association of Independent Electronic Mass Media of Central Asia, which states that “Television and radio journalists have no right to cover the details of the personal life of an individual without his or her permission” (§4), sound like a legitimizing device for the protection of politicians from critical journalism. In contrast, the Kyrgyz code of June 1997, designed by a group of journalists, requires journalists “not to interfere with the private life of a person unless the action seeks to protect the interests of society” and balances personal and public rights (Mould & Schuster, 1999, p. 201).

Freedom

What is written in journalistic codes of ethics about “freedom”—freedom of expression, of the press, of the media, and so forth—does not necessarily reflect the real state of affairs. Studying ethical codes is no substitute for detailed observation of flagrant violations of media freedom in many countries. However, an analysis of ethical codes helps one to understand that most governments and administrations that restrict freedom of expression violate their own ethical norms and the values of their cultures and societies.

The following analysis will not reveal whether media freedom exists in either Europe or North Africa, the Middle East, and the Islamic Far East, but it will shed light on whether a normative culture of freedom exists in those countries.

The codes assembled in Table 4 can be categorized into three types:

- codes incorporating freedom as a central value that can only be limited when it interferes with other fundamental rights (International Federation of Journalists, Algeria, Finland, Germany, Alliance of Independent Journalists [Indonesia], Italy, Morocco, Norway, Spain, Tunisia, United Kingdom) (Group 1)
- codes incorporating freedom as a central value that is, however, limited due to political, national, religious, and cultural considerations (Council of Arab Information Ministers, Egypt 1972, Egypt 1983, Lebanon, Kazakhstan, Kyrgyzstan [June 1997], Malaysia, Pakistan 1972, Pakistan 1993, Saudi Arabia, Turkey) (Group 2)
- codes that do not mention freedom rights at all (ASEAN, Arab Federation of Journalists, Islamic Media Charter, BaNgladesh, France, Iraq, Kyrgyzstan [September 1997], International Principles of Professional Ethics in Journalism) (Group 3)

Concentrating on the first group and on Middle Eastern and Islamic countries, it is remarkable that the codes containing the clearest regulations on media freedom come from the “Islamic periphery,” designed either in the Arab West (Maghreb) or in Central Asia or Southeast Asia, while the historical core countries of Arab and Islamic civilization (Egypt, countries of the Arab peninsula, etc.) appear behind.

The Algerian code contains one of the most outspoken commitments to freedom of expression when compared with other Arab codes. Furthermore, the code states that a journalist’s obligations toward the publisher and the state (*pouvoirs publics*) rank second to his or her responsibility toward the public and society. The code was surely a reaction to the ups and downs of media freedom in the 1990s. The relative pluralism of the Algerian press was severely endangered both by Islamist militia, who killed a number of journalists, and by Algerian governments, which restricted media freedom in the course of civil war. In Algeria, the state owns and controls radio and TV monopolies as well as printing works that exert economic pressure on the press. The press law forbids “insults” against politicians and officials, and in the year 2000 five journalists were still listed as missing. The Syndicat National de Journalistes (SNJ) works for the revision of the restrictive 1990 Information Act.⁵ The Moroccan code contains several norms safeguarding freedom and plurality of the media. In contrast to the Algerian code, however, dedication to freedom rights seems low profile. Unlike the Algerian code, the Moroccan code integrates no references to democracy and does not derive freedom rights from the public’s right to be informed. The Syndicat National de la Presse Marocaine (SNPM) has already voted for an amendment that would “protect journalism freedom and the duties of journalism as a fourth estate” (Nejjar, 1999; see also Moujahid, 1998; El Watan, 2000). The third Maghreb country in this study, Tunisia, under the presidency of Ben Ali, ranks among the most restrictive systems when it comes to press and media freedom. The code of journalism ethics adopted in the era of his predecessor, long-term President Habib Bourguiba, in 1975 seems little more than a remnant of libertarian attitudes prominent at that time.

On the other side of the Islamic world, the code of ethics adopted by the Alliance of Independent Journalists (AJI) in Indonesia is proof of the fact that after the fall of President Suharto and the New Order regime, a new generation of democratically minded journalists has come to the fore. They have started to challenge “politician” journalists

Table 4
Freedom in journalism codes

	Phrase or passage
Council of Arab Information Ministers	“freedom of expression” (§2)
International Federation of Journalists	“defend the principles of freedom on the honest collection of Federation of publication news” (§2)
Algeria	“Le droit à l’information, à la libre expression et à la critique est une liberté fondamentales qui participent de la défense de la démocratie et du pluralisme médiatique” (preamble); “défendre la liberté d’information, d’opinion, du commentaire et de la critique” (§2; Section “Déclaration des devoirs”)
Egypt (1972)	“defence of the freedom of the press” (§1/h, Section “Declare”); “non-interference by the executive” (§2; Section “Declare,” Part 2); “elimination of all obstacles . . . to external sources” (§6; Section “Declare,” Part 2)
Egypt (1983)	“freedom of the press under the sole supervision of the people” (§a, Section “First”)
Egypt (1996)	“protection of the achievements of the people and its general liberties, above all freedom of press, thought, opinion and publication” (preamble); “A journalist’s activities in doing his job (. . .) should not cause any punishment of such journalist or infringement of his security” (§1, Section “Duties and Rights,” Part 2)
Finland	“Good, journalistic practice does not limit either the journalist’s or the public’s freedom of expression” (preamble)
Germany	“The freedom of the press guaranteed in the Basic Law of the Federal Republic of Germany embraces independence and freedom of information, expression of opinion and criticism” (preamble)
Indonesia (AJI)	“A journalist always defends the principles of free and balanced coverage, reporting, critique and comments” (§2)
Italy	“Freedom of information and of expression are insuppressible rights of all journalists, they are limited by the observance of the rules and law and suggested to the protection of other people’s personality” (Preamble)
Kazakhstan	“freedom of speech is a fundamental right of man” (preamble)

Table 4
Freedom in journalism codes (*Continued*)

	Phrase or passage
Kyrgystan (June 1997)	“freedom of speech is a fundamental right of an individual” (June 1997) (preamble)
Lebanon	“Through practicing its [the newspaper’s] own freedom it is also committed to defend this freedom and civil liberties” (§1)
Malaysia	“[the Malaysian press] believes in a liberal, tolerant, democratic society and in the traditional role of a free and responsible press” (§4, Part 2)
Morocco	“liberté d’expression” (§1); “pluralité des idées” (§6)
Norway	“allowing different views to be expressed” (§1/2); “A member of the editorial staff cannot be ordered to write or do anything which is contrary to his or her own convictions” (§2/5)
Pakistan (1972)	“freedom of information of the press” (preamble)
Pakistan (1993)	“safeguarding the freedom of the press” (preamble)
Saudi Arabia	“freedom of expression”
Spain	“freedom of information and the freedom to express one’s opinions (preamble)
Tunisia	“freedom of the press”; “tolerance towards those who do not share his/her views”
Turkey	“freedom of communication (is the) basic precondition of achieving human dignity, open government and democracy” (preamble); rejection of “any external interference over the activities of the Press Council” (preamble)
United Kingdom (1994)	“freedom of the press and other media” (§2); “eliminate distortion, news suppression and censorship” (§2)

in the tradition of pro-government and pro-state journalism ethics (Hidayat, 1999, p. 184). The Alliance of Independent Journalists, which has existed since 1994 and has worked for years in the underground, represents democratic journalism and is one of the most advanced independent journalism associations in the Islamic world. In Central Asia, the Professional Ethics Code of Journalists of the Kyrgyz Republic, adopted by a number of editors in June 1997, contains a clearly formulated commitment to the freedom of the media. In doing this, it is more freedom oriented than the second Kyrgyz code, published only a few months after the editors’ code by a national media organization

(see Group 3). In the June code, restrictions to freedom are limited to views that call for “violent overthrow,” “propaganda for war,” claims to “national or religious superiority,” and “intolerance against other nations” (preamble). Such limits are to be understood in the context of ethnic strife and risk of war in Central Asia and the Caucasus, and they are in tune with the idea of balancing fundamental rights like freedom and physical personal integrity with each other. The code is in line with the perception of the Kyrgyz Republic as being among the most democratic in the area.

While almost all Western European codes must be categorized in the first group, since freedom rights are only limited with regard to other constitutional rights (such as protection of privacy), and while most Maghreb and some of the Asian Muslim codes also belong to this category, the codes of most Arab and non-Arab countries in the Middle East, in its geographic extension from Egypt to Pakistan/Afghanistan, belong to the second group of codes, mentioning freedom rights but also limiting them owing to political, national, religious, and cultural considerations.

Starting with the older Arab codes of the 1970s, freedom rights in the 1978 Council of Arab Information Ministers are limited by a number of far-reaching obligations concerning the respect of “national identity” and the “Arab nation” (§3), the “Arab homeland” (§4), and the avoidance of harm to “Arab solidarity” (§5). No wonder, therefore, that the code is contradictory insofar as it allows for “freedom of expression” (§2) while at the same time legitimizing censorship by Arab governments: Governments “should not confiscate or censor unless there is absolute necessity” (§14). The 1975 Lebanese Charter of Professional Honour adopted by a general assembly of the Press Syndicate was dedicated to freedom of expression (§1). Although prewar Lebanon had developed the freest media system in the Arab world, the code of ethics contained references to nationalism and patriotism. Newspapers should render “a cultural, social, patriotic, national and humanitarian public service” (§1). Above that, they should “mobilize public opinion in defence of the country” (§5).

The draft code of the 1996 Egyptian Press Syndicate contains clear references to freedom of speech and of the press. It also states very openly that journalists must not go to jail for doing their job (§1; Sec. “Duties and Rights,” Pt. 2)—a passage that is in tune with a 2000 draft law worked out by the Arab Journalism Union under its Egyptian chairman Ibrahim Nafie that replaces prison penalties for journalists with monetary fines (Hamzeh, 2000). Despite the fact that the 1996 ethical code is less ideological than the 1972 code (e.g., it does not contain references to Arab unity) and is more clearly in favor of freedom rights than the 1983 code, it still demands of the media “adherence to the patriotic and moral values of the Egyptian society” (preamble). The code also maintains that “freedom of the press arises from the freedom of our country” (§1; Sec. “General Principles”). Patriotic values, however, restrict freedom on the basis of ideological considerations other than fundamental human rights, which is the reason why the 1996 code belongs to Group 2.

The Saudi Arabian Media Charter, adopted by the Council of Ministers in 1982, must be categorized here as well because it guarantees freedom of expression only “within the framework of Islamic and national objectives and values.” Above that, the mass media must “oppose destructive trends, atheistic tendencies, materialistic philosophies and attempts to divert Muslims from their faith.” The difference in categorization between the Saudi Arabian charter and the Islamic Media Conference charter (see below) seems to lie in the phrase “freedom of expression,” a phrase without distinct meaning in a highly censored and controlled media system like the Saudi Arabian one, which is based on the supremacy of the al-Saud family over the state and on Wahhabi ultraconservatism.

Besides Arab countries, freedom limitations are also visible in the code adopted by a large gathering of journalists in Kazakhstan. Despite mentioning Article 19 in the Human Rights Declaration, the following sentence may serve as a legitimizing device for arbitrary interventions into a journalist's ability to present facts and opinion: "Propaganda and agitation for changing the constitutional order by force," "violations of integrity of the Republic," and "undermining the security of the state" are not permitted (preamble). The same is true for other Muslim Asian countries like Malaysia and Pakistan. In addition to codifying press freedom (§4, Pt. 2), the Malaysian Canon of Journalism obliges journalists to contribute to nation building (§1, Pt. 1), to promote national unity (§2, Pt. 2), to work against communism (§3, Pt. 1), and to "uphold standards of social morality" (§6, Pt. 1). Also in the preamble, the code is said to be based on the principles of Rukunegara, the Malaysian national ideology, which stresses national unity, democracy, social equality, progressive thought, and traditional culture (Gunaratne, 2000).

In Pakistan, the 1972 code of the "democratic" Bhotto era, adopted by the General Assembly of the Committee of the Press, and the 1993 code, worked out by the Newspaper Editors' Council of Pakistan, confirm that freedom is a basic right of the press. The 1972 code in particular mentioned the Universal Declaration of Human Rights of the United Nations as a source. But the same document also obliged journalists not to publish anything that is "to the detriment of national and public interest" (§1, Pt. 1), that "may undermine the security of the State or solidarity of the nation" (§11, Pt. 1), or that may "undermine the loyalty and allegiance of the Armed Forces of Pakistan" (§12, Pt. 1). Likewise, the 1993 code ties freedom of journalism to the imposition of media laws "in the interest of the glory of Islam, of the integrity, security or defence of Pakistan . . . and friendly nations with foreign states, public order, decency or morality" (preamble). Such passages make it clear that freedom in the context of the whole fabric of ethical devices contained in the Pakistani codes is merely a rhetorical device that is severely limited by a set of ideologies and political restrictions.

In Turkey, the Code of Professional Principles of the Press as formulated by the Press Council guarantees freedom of communication and is, in most paragraphs up to Western European standards. This fact is important, because Turkey has achieved the status of a candidate for the European Union and is being encouraged to harmonize its laws and regulations with those of other EU countries. In the Kemalist tradition the code was designed after Western models, and it restricts freedom merely with references to professional control of sources, privacy rights, and so forth. There is, however, one major exception to the Turkish code's compatibility with other European codes: Paragraph 2 lists a number of far-reaching ideological limits to freedom. Turkish journalists shall vow not to publish anything that "is damaging to public morals, religious sentiments or the foundations of the institution of family." This paragraph opens the door to extensive self-censorship or even external censorship in the name of higher national or religious goals; it therefore justifies a categorization under Group 2 (codes with limited freedom) and would certainly need to be discussed and modified in the process of EU integration.

Of ethical codes in the third group, which do not mention freedom of expression at all, it seems that multilateral codes tend to be more rigid than many of the single country codes, probably because it is hard to find a consensus on freedom issues among organizations with varying political backgrounds. The Federation of Arab Journalists could easily sign the 1983 International Principles of Professional Ethics in Journalism, which does not clearly represent freedom of expression. Neither the ASEAN code nor FAJ opt for freedom, unlike the codes of single member states such as Malaysia or

Egypt. Even more so, the 1980 Islamic Mass Media charter, adopted by the First International Islamic Media Conference in Jakarta, contains an explicit appeal to censor all information that is “non-Islamic”: “Islamic media-men should censor all material which is either broadcast or published in order to protect the Ummah from influences which are harmful to Islamic character and values” (§3). The charter expresses a conservative and traditionalist understanding of Islam as a static set of rules and values that must be followed uncritically by journalists—a view that is contradicted by liberal Muslims, many of whom adhere to the other ethics codes of the Arab or other Islamic countries analyzed here.

Among the single national codes, the French code is an exception from Western European standards (see Group 1) because it contains only indirect references to freedom of expression. The journalist, it holds, “does not make use of the freedom of the press with profit-seeking intentions.” Of course, the case of France reveals the limits of an evaluation and categorization of journalism codes. France (from Group 3), which in reality guarantees a high degree of media freedom, is ranked below a country like Tunisia (from Group 1), among the most restrictive “enemies of the press” in the world. It must be said, however, that due to a number of grave legal restrictions on press freedom (Bourgeois & Grosser, 2000, p. 63), France shows the worst of all Western European countries in the annual Freedom House records, where the French system is categorized as “free” but with a score that is close to “partly free.” Not surprisingly, the Bangladesh code is to be listed in the group of ethical codes ignoring freedom rights. It protects not freedom of expression but caste, creed, nation, and religion: “Newspapers shall refrain from publishing any news which is contemptuous of or disrespectful to caste, creed, nationality and religion of any individual, community or the country” (§8). The code seems to confirm the general impression of Bangladesh, that the free elections of 1991, which brought Begum Khaleda Zia to power, were not followed by a redefinition of social hierarchies and relations. Consolidation of democracy has remained fragile since many status quo interests have remained intact (Datta, 1994, p. 188).

In general, the comparison of freedom regulations in different ethical charters shows that Thomas W. Cooper (1989) was correct in his observation that the search for truth is much more clearly a universal value than adherence to freedom of expression (pp. 20–39; see also Cooper, Christians, Plude, & White, 1989, pp. 243–345). This does not mean that Muslims generally love freedom less, since many of the restrictive codes have been released by authoritarian governments rather than by journalists or other important segments of civil society. Those codes that were adopted by independent associations of journalists and that express the democratic will of their constituents are clearly more freedom oriented than those that have been dictated by the state.

Internationalism

Internationalism in journalism ethics is important since foreign news coverage can influence international relations. While it is hardly possible to generalize on the impact of the media on political decision making, the press—and at times also radio and TV—must be seen as providing a so-called resource function to politicians. A number of experts have pointed to the fact that, especially at turning points and in moments of international crisis, the media can exert pressure on the direction of national foreign policies by creating or representing a certain public climate to whose influence politicians are susceptible. However, there are also many examples of the weak position of the media vis-à-vis foreign policy. The effect of media on politics is limited to short

moments of public diplomacy, whereas the political system of each country provides the media with a continuous and overwhelming amount of public relations information that usually trickles down through the news agencies to the media newsrooms. Irrespective of whether mass media influence politicians or vice versa, journalists are domestic forces to be reckoned with in international and national foreign policies (Wittkämper, Bellers, Grimm, & Wehmeier, 1986). Therefore, ethical reflections on international norms of journalism as a means of journalistic self-regulation in foreign news coverage seem vital.

By and large, the codes of ethics collected and analyzed here (Table 5) show the following features of internationalism: (a) Western single national codes ignore international questions altogether, and (b) many codes of Middle Eastern and other Islamic countries refer to international questions partly in a very defensive manner, warning against the impact of colonialism, Zionism, and foreign enemies, but at times also promoting good international relations.

A number of studies on European codes of journalism ethics have found that explicit references to international relations are exceptional. Reflections on international journalism values were stronger in Eastern than in Western European journalism codes during the Communist era, since internationalism was part of the official Soviet ideology that was echoed in the ethical codes of the time (Laitila, 1995). Some remnants of that ideology have survived the democratic transition of the 1990s and are still part of Eastern European codes, without, however, influencing developments in the rest of Europe. Most Western codes do contain norms of antiracism and religious tolerance, but hardly any references to international relations, world peace, or the like as expressed in the 1983 International Principles of Professional Ethics in Journalism or in the Finnish ethical code. Since the beginning of the 1990s, efforts have been under way in the European Parliament or on the ministerial level to design a common European media charter (Laitila, 1995, p. 68). One of the main arguments for a European code is internationalization of journalism values in the age of transnational politics and globalization (Laitila, 1995, p. 71). Up to now, however, collective formalized journalism ethics in most parts of Europe is confined to values of truth, objectivity, privacy, freedom, and the like; international values are left to the individual journalist.

Middle Eastern and Islamic codes mention international aspects of journalism more frequently than European codes, but they often reveal a defensive culture, calling on journalists to protect themselves, their audience, and society from dangerous foreign influences. Both greater sensitivity to international aspects and the defensive style of ethical reasoning mirror a North-South conflict between the "First" and the "Third World." Codes of ethics argue against foreign advertisements and propaganda, foreign ideologies like Zionism, foreign national interest and assistance for the (neo)colonialist "enemy," and foreign sources.

The Federation of Arab Journalists declared in its 1972 ethical code that "political advertisements submitted by foreign bodies are prohibited unless they are in harmony with the national policy," and FAJ demanded that Arab journalists not exert any propaganda "for the benefit of imperialist states, reactionary forces and foreign monopolies." Like the Arab regional code, the Islamic Mass Media Charter of Jakarta, adopted in 1980, was obviously designed to protect the Middle East and the Islamic world from Western media and Western political and cultural influence, including Zionism as a variant of colonialism. The Jakarta conference demanded that the journalist "combat all forms of colonialism, aggression, fascism and racism" along with "Zionism and its colonialist policy of creating settlements as well as its ruthless suppression of the Palestinian people"

Table 5
Internationalism in journalism codes (selection)

	Phrase or passage
ASEAN	“striving at all times (. . .) to promote closer friendly relations among [ASEAN countries]” (§10)
Council of Arab Information Ministers	“supporting understanding and cooperation between Arab countries” (§5); “pay special attention to Arab news and information materials” (§10)
Egypt (1972)	“Promotion of world peace and international co-operation in line with the United Nations Charter and international conventions and agreements” (§1/g, Section “Declare”); “Ensuring the right of journalists to cover any event of international importance on the site of the event regardless of the nature of the State’s official relations with the country where it has occurred” (§7, Section “Declare,” Part 2)
Federation of Arab Journalists	“Political advertisements submitted by foreign bodies are prohibited unless they are in harmony with the national policy. . . [no propaganda] for the benefit of imperialist states, reactionary forces and foreign monopolies”
Finland	“human rights, democracy, peace and international understanding” (preamble)
Iraq	“[the journalist should not] make any declaration or suggestion that might benefit an enemy at the expense of the country” (§7)
International Principles (1983)	“[The] journalist (. . .) contributes through dialogue to a climate of confidence in international relations conducive to peace and justice everywhere, to détente, disarmament and national development” (§VIII)
Islamic Media Conference (1980)	“combat all forms of colonialism, aggression, fascism and racism”; “combat Zionism and its colonialist policy of creating settlements as well as its ruthless suppression of the Palestinian people” (§2)
Pakistan 1993	“The press shall refrain from publishing anything likely to bring into hatred or contempt the head of any friendly state” (§13)

(§2). Quite naturally, widespread defensiveness against Western and foreign media influence in codes of the 1960s, 1970s, and 1980s was also echoed in the 1978 “Charter of Honour” released by the Council of Arab Information Ministers. The charter gave priority to Arab sources and asked the journalist to “pay special attention to Arab news and information materials” (§10).

Quite naturally, the other side of the coin of the ethics of anti-imperialism and anti-Zionism was and is the propagation of friendly relations among, for instance, Arab or ASEAN countries, as mentioned in the respective regional codes of ethics. The 1989 ASEAN code insists on “striving at all times . . . to promote closer friendly relations among” ASEAN countries (§10), and the Council of Arab Information Ministers’ charter seeks to support “understanding and cooperation between Arab countries” (§5). The Iraqi code, at the same time, was directed against national “enemies” in general, forbidding its journalists to “make any declaration or suggestion that might benefit an enemy at the expense of the country” (§7). The “enemy,” however, could also be another Arab or Islamic country—as was true of Iraq’s many regional wars against Iran (1980–1988) and Kuwait (1990–1991).

There are only a few examples of a positive approach toward international relations in Arab journalism codes. The 1972 Egyptian code demanded that the “promotion of world peace and international co-operation [shall be] in line with the United Nations Charter and international conventions and agreements” (§1/g, Sec. “Declare”). The code also ensured “the right of journalists to cover any event of international importance on the site of the event regardless of the nature of the State’s official relations with the country where it has occurred” (§7, Sec. “Declare,” Pt. 2). The phrases exemplify an understanding of journalism as a profession independent from the state. The values of world peace and international cooperation are deemed more important than the goals of national interest.

Except for such rare instances as the 1972 Egyptian code or the Finnish code, however, international ethical consciousness, as mirrored in the ethical codes of both European and Middle Eastern and Islamic countries, is extremely underdeveloped.

Tradition, Mores, and Religion

A deep divide between the European and *some* Arab and Islamic codes exists with respect to the role tradition, mores, and religion play in journalism ethics (Table 6). While European codes do not reveal any tendency toward traditionalism, codes of North Africa, the Middle East, and the rest of the Islamic countries are divided between “modernist” codes that do not refer to tradition, mores, or religion and “traditionalist” codes that uphold moral appeals in this field. Among the latter, especially the Islamic Media Charter of Jakarta and the Saudi Arabian code must be mentioned, and to a lesser degree the codes of Pakistan, Bangladesh, Kyrgyzstan (September 1997), Egypt (1983), and the Council of Arab Information Ministers of 1978.

Concerning the role of *tradition*, the correct and literary use of the Arabic language is important to both secular and religious Arab codes of conduct (see, for example, the Council of Arab Information Ministers, the Jakarta conference, and the Saudi Arabian codes). Since the Arab world stretches from Morocco to the Persian Gulf, and peoples, historic experiences, and cultures vary tremendously, the Arabic language is considered the single most important element of Arabism and Arab nationalism. From this perspective, reminding journalists of the use of high standard Arabic (*fusha*) seems particularly important in the age of satellite TV and radio, since broadcasts can be received in most Arab countries, making adherence to common language standards all the more important.

Another aspect is the role reserved for historical traditions. While the 1983 Egyptian code asked journalists to be conscious of the country’s history, the Jakarta Mass Media Charter emphasizes *Islamic* traditions. Therefore, even though various Arab and

Table 6
Tradition, mores and religion in journalism codes (selection)

Tradition	
Council of Arab Information Ministers	“The Arab journalist should keep the Arabic language correct and sound and expand it among the Arab nation in order to substitute dialects.” (§9)
Egypt (1983)	“loyalty to the (. . .) country’s history” (§c; Section “First”)
Islamic Media Conference (1980)	“preserving the integrity of (. . .) Islamic traditions” (§3); “be interested in Islamic history, Islamic civilization and the promotion of Arabic language” (§4)
Saudi Arabia	“preservation of the established order”; “promote the use of correct and pure literary Arabic language”
Religion	
Islamic Media Conference (1980)	“conscious of the goals and aspirations of the Ummah” (Preamble); “Consolidation of (. . .) Islamic values and ethical principles” (§1); “keep vigilance against anti-Islamic ideas and trends” (§2); “struggle for the liberation of Palestine” (§4); “propagation of Da’wah [mission]” (§4)
Kyrgyzstan (Sept. 1997)	“The religious beliefs of journalists should not influence the objectivity” (§5)
Pakistan (1993)	“refrain from publishing anything derogatory to religion or (. . .) religious feeling of any sect/ minority” (§12)
Saudi Arabia	“obedience to God (and) His Messenger”; adoption of Islam and Sharia
Mores	
Islamic Media Conference (1980)	“present real facts within the frame-work of Islamic rule of conduct” (§1); “refrain from publishing obscene material” (§3); “refrain from (. . .) publishing anything that goes against public morality” (§3)
Bangladesh	“highlight any news which projects degeneration of moral values in our society” (§21); “maintain extra precaution in publishing any news involving man-woman relationships or any report relating to women” (§21); “All scenes of indecent kissing must be avoided” (§26)

Table 6Tradition, mores and religion in journalism codes (selection) (*Continued*)

	Mores
Egypt (1996)	“not allowed to publish any advertisement whose subject contravenes the society’s general values, principles and morality” (§8, Section “Rights and Duties”)
Kyrgyzstan (June 1997)	“dissemination of pornography (is) prohibited” (Preamble)
Malaysia	“upholding standards of social morality” (§1/6)
Pakistan (1972)	avoid “Immorality and obscenity” (§1/2)
Pakistan (1993)	avoid “Immorality and obscenity” (§1)
Saudi Arabia	observe “the nature of women and the role she is called to play in society without that role conflicting with such nature”

Islamic codes reveal a strong tendency toward traditionalism, they draw upon different secular or religious Islamic legacies that are clearly shaped by the national or organizational interests of those who designed the relevant codes of ethics. While “tradition” is usually expected to refer to a fixed canon of historical habits, ways of thought, and so on, there is, in fact, no consensus on the contents of tradition among different journalism codes of the Middle East and the Islamic world.

The Islamic Mass Media Charter of Jakarta and the Saudi Arabian code of conduct are the only ones demanding of their journalists adherence to the religion of Islam, to the community of believers (*umma*), and to religious mission and propaganda (*dawah*). The Jakarta charter is a document of traditionalist Islamic media ethics. With the exception of representatives of the Egyptian newspapers *Al-Ahram* and *Al-Jumhuriyya*, who were present at the conference, all other representatives belonged to the neo-*salafiyya* and neo-*wahhabiyya* movements of Islam (Schulze, 1990, pp. 304–311). Saudi Arabia occupies an exceptional position in the Arab world as a social and political system whose constitution is built around religious traditions and laws. Pakistan in 1993, while also being an Islamic republic (*Islami Jumhuriya Pakistan*), merely demanded that any news derogatory to religious beliefs not be published. The Pakistani code reveals a passive notion of the protection of religious integrity in contrast to the invitation to active propaganda (*dawah*) found in the Jakarta charter or in Saudi Arabia’s ethical code. Kyrgyzstan’s September 1997 code is an example of a secularist approach to journalism. The code of the Association of Independent Electronic Mass Media of Central Asia maintains that “religious beliefs of journalists should not influence . . . objectivity” (§5), which is in line with the atheist traditions of the former Soviet republics of Central Asia (Freitag-Wirringhaus, 2000). The code does not reveal signs of the Islamization of ethical standards observed in other spheres of the politics and public life of Central Asia after the disintegration of the Soviet Union (Freitag-Wirringhaus, 2000).

A last aspect of the role tradition plays in journalism codes is public mores. Some

codes show that their creators were afraid that if the media departed from established common mores and followed individual paths of morality, society would be in danger. Some codes show a preoccupation with relationships between men and women, “obscenity” or pornography (e.g., the codes of Jakarta, Bangladesh, Kyrgyzstan, and Pakistan), and the image of women in the media. “Kissing” (in Bangladesh) or “pornography” (in Kyrgyzstan) shall be avoided, and Saudi Arabia demands that its journalists not question the traditional role that women play in Saudi society.

Conclusion: Western Individual Versus Eastern Communitarian Journalism Ethics?

It is tempting to try to subsume journalism ethics in Europe and the Islamic world under two separate headings. One might argue that journalism ethics in the Middle East, North Africa, and the Muslim countries of Asia are determined by taboos. It seems hard for the media to cover issues in the “triangle of religion, sex, and politics” (Al Nimri, 1995, p. 115). Western ethics, in contrast, could be said to hold contrary values that favor the individual right to express almost everything, even at the cost of traditions, religious as well as personal piety, and political interest. Such bipolarity would fit into Michael Traber’s (1997) general assumption that Western communication ethics is shaped by individualist and Asian and African ethics by communitarian or collectivist approaches (p. 328).

The above comparison of journalism codes adopted by various states and organizations during the last 30 years reveals, however, that norms guiding attitudes of “good” journalism are much more complex. We have shown that many European as well as Oriental codes of ethics try to balance personal and private with public interests. Some Oriental codes seek to protect privacy more strictly than their European counterparts do, but the protection of privacy rights is not a sign of a collectivist ethics approach. On the contrary, the individual seems better protected from public sensationalism by Oriental than by European codes.

However, such sensitivity to personal rights in Oriental codes is accompanied by a much lower degree of freedom when it comes to news touching upon interests of the state, the nation, or religion. Codes point to very different loyalties, including state security and stability and protection of caste over Arabism, but collectivist restrictions to individual freedom of information and communication are clearly stronger in many Oriental than European codes, a fact that seems to support Traber (1997), Mowlana (1989), and others who speak of Eastern communitarian or collectivist communication ethics. A code such as the 1980 Islamic Mass Media Charter of Jakarta demanding religious loyalty of journalists would not be possible in modern Europe.

It is remarkable, however, that individual rights to freedom of expression are integral and unnegotiable parts of all *independent* codes, including the 2000 Algerian code and that of the Alliance of Independent Journalists of Indonesia. Many of those collectivist aspects of journalism codes that restrict media freedom seem closely connected to the power structures behind ethics codification. Authoritarian governments demand that their journalists not criticize the government or the state in order to avoid public criticism—not because their cultures are necessarily based on consensus. There is no way to prove that the taboo triangle of “religion, sex, and politics” that restricts freedom of expression is an aspect of communitarian communication ethics in Asian and African countries before public media spaces are opened, allowing journalists and the people to debate and define their values. Oweis Aslam Ali (n.d.) has described the intimate rela-

tionship between freedom and culture in questions of media ethics: “The values that emerge as a result of the free expression of views by Asian journalists will inevitably be Asian in character. . . . Governments have cynically misused our traditions, religion, culture, and values we hold to be dear as justification for suppressing human rights. . . . We should, therefore, remain vigilant that discussions on Asian values in journalism are not hijacked by politicians and government officials and used as a justification for control of media.”

In the final analysis, the dichotomy of individual Western versus communitarian Eastern journalism ethics is much too simplistic to serve as a general paradigm when comparing European with Middle Eastern, North African, and Muslim Asian ethical codes and discourses. The situation is reminiscent of what Francis B. Nyamnjoh (1999) has said about African ethics: “The communal values and ethics . . . are based more on a romantic reconstruction of the precolonial situation and a frozen view of harmony in rural Africa. . . . The implication of this is that being African is not a static or frozen reality, but a dynamic identity that keeps redefining itself with new experiences and contacts with other peoples and cultures” (p. 66).

Notes

1. See “Les journalistes se dotent,” 2000.
2. The Web site <http://www.journalism-islam.de> was searched using the keyword “ethics of journalism.”
3. See Middle East News Agency (MENA), 1999, and “Mithaq sharif al-amal al-sahafi ligarida ‘al-hayat’ wa-magalla ‘al-wasat,’” in *Al-Hayat*, November 29, 1999.
4. “Publicness” describes the state of being public without bearing the connotations of the term “publicity” as a conscious act of going public.
5. See “1998 Report on the Situation of the Media.” (n.d.)

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Appendix: Codes of Journalism Ethics

All of the following codes of journalism ethics are available at <http://www.journalism-islam.de> (*Codes of Ethics*).

Al-Hayat

Mithaq sharif al-amal al-sahafi li-garida “al-hayat” wa-magalla “al-wasat.” Source: *Al-Hayat*, November 29, 1999

Algeria

Charte d'éthique et déontologie des journalistes algerien. Adopted by a conference of Algerian journalists and the Syndicat National de Journalistes (SNJ), Algiers, Maison de la presse, Tahar Djaout, April 13, 2000. Source: *El-Watan*, April 20, 2000, p. 9

ASEAN

Adopted by the 1989 Seventh Assembly of the Confederation of ASEAN Journalists. Source: Retrieved March 25, 2001, from http://www.ijnet.org/Code_of_Ethics2/ASEAN_Journalists_Code_of_Ethics.html

Bangladesh

Code of Conduct. Adopted by Newspapers, News Agencies and Journalists of Bangladesh, 1993. Source: *Communication Ethics*, 1997

Council of Arab Information Ministers

Arab Information Charter of Honour. Reviewed by the Council of Arab Information Ministers in Cairo (August 2–3, 1978) as a prelude to submission to the Arab Summit for approval. Source: Nordenstreng, 1989, pp. 275–277

Egypt (1972)

Charter of Work and Code of Ethics in the Press. Adopted in 1972. Source: Jones, 1980, pp. 67–69

Egypt (1983)

Code of Ethics. Adopted by the Supreme Council of the Press in Egypt, 1983. Source: Nordenstreng, 1989, pp. 169–170

Egypt (1996)

Code of Press Ethics. Draft code of press ethics submitted to the General Assembly of the Egyptian Press Syndicate, May 1996. Source: Retrieved March 25, 2001, from <http://www.journalism-islam.de/codes.html>

Federation of Arab Journalists

Arab Code of Ethics. Adopted by the Third Conference of the Federation of Arab Journalists, April 1972, Baghdad. Source: Nordenstreng, 1989, pp. 273–274

Finland

Guidelines for Good Journalist Practice. Adopted by the Union of Journalists in Finland in November 1991. Source: Retrieved March 25, 2001, from <http://www.uta.fi/ethicnet/finland.html>

France

Charter of Professional Duties of French Journalists. Adopted by the National syndicate of French Journalists in 1918 and revised and completed by the syndicate in 1938. Source: Retrieved March 25, 2001, from <http://www.uta.fi/ethicnet/france.html>

Germany

Publicistic Principles/Press Code. Drawn up by the German Press Council in collaboration with the press associations and presented to Federal President Gustav W. Heinemann on December 12, 1973, in Bonn. Last updated version of February 23, 1994. Again updated in 1999 (4.2.). Source: Retrieved March 25, 2001, from <http://www.uta.fi/ethicnet/germany.html>

Indonesia

Code of Ethics. Adopted by the Alliance of Independent Journalists in Jakarta, July 12, 1998. Source: Retrieved March 25, 2001, from <http://www.journalism-islam.de/codes.html>

International Federation of Journalists

Declaration of Principles on the Conduct of Journalists. Adopted by the Second World Congress of the International Federation of Journalists at Bordeaux. Source: Retrieved March 25, 2001, from <http://www.uta.fi/ethicnet/ifj.html>

Iraq

Rules of Professional Ethics. The Iraqi Syndicate Law 178, Article 25, of 1969 includes rules of professional ethics inspired by the resolutions of the Second Congress of the Federation of Arab Journalists, convened in Cairo, February 1968. Source: Nordenstreng, 1989, p. 176

Islamic Media Conference (Jakarta 1980)

Islamic Mass Media Charter. Adopted by the First International Islamic Mass Media Conference, Jakarta, September 1–3, 1980. Source: Rabitat Al-Alam Al-Islami, 7(12), 1980, pp. 60–61

Italy

Charter of Duties of Journalists. Adopted by the National Federation of the Italian Press and National Council Order of Journalists in Rome on July 8, 1993. Source: Retrieved March 25, 2001, from <http://www.uta.fi/ethicnet/italy.html>

Kazakhstan

Code of Ethics for Journalists in Addressing Ethnic Relations in the Republic of Kazakhstan. The code was published in *Kazakhstanskaya Pravda*, a government newspaper with a circulation of over 40,000, on June 7, 1997. It was endorsed by 36 other government and nongovernmental newspapers and six broadcast stations. Source: Retrieved March 25, 2001, from <http://www.fes.de/fulltext/iez/00710b02.html>

Kyrgyzstan 1

Professional Ethics Code of Journalists of the Kyrgyz Republic. Adopted in June 1997 by the editors of all government newspapers, the president of state radio and television, and the editors of some nongovernmental newspapers. Source: Retrieved March 25, 2001, from <http://www.fes.de/fulltext/iez/00710b02.html>

Kyrgyzstan 2

Professional Code of Ethics of Television and Radio Journalists of the Kyrgyz Republic. Adopted by the Association of Independent Electronic Mass Media of Central Asia at its conference in Bishkek, Kyrgyz Republic, September 8–9, 1997. Source: Retrieved March 25, 2001, from <http://www.fes.de/fulltext/iez/00710b02.html>

Lebanon

Charter of Professional Honour. The General Assembly of the Press Syndicate in Lebanon approved this legacy at the meeting of February 4, 1974. Source: Nordenstreng, 1989, pp. 174–175

Malaysia

Canon of Journalism. Author unknown. Source: Retrieved March 25, 2001, from <http://www.uow.edu.au/creats/journalism/ajnet/ethics.html>

Middle East News Agency (MENA)

Clear-Cut Objectives . Source: Retrieved March 25, 2001, from <http://www.mena.org.eg/English/AboutMena.asp>

Morocco

La charte déontologique. Adopted by Syndicat National de la Presse Marocaine (SNPM). Source: Organisation Marocaine des Droits del 'Homme (OMDM)/Article 19, Rabat, London, 1995, pp. 296–297

Norway

Ethical Code of Practice for the Press (printed press, radio, and television). Adopted by the Norwegian Press Association on December 14, 1994. Source: <http://www.uta.fi/ethicnet/norway.html>

Pakistan (1972)

Code of Ethics of the Pakistan Press. Adopted by the General Assembly of the Committee of the Press, 1972. Source: Cooper et al., 1989a, pp. 306–308

Pakistan (1993)

Declaration of Objectives. Adopted by the Newspaper Editors Council of Pakistan (NECP). Source: Retrieved March 25, 2001, from <http://www.fes.de/fulltext/iez/00710b01.html>

Saudi Arabia

Media Charter. Adopted by the Council of Ministers in 1982. Source: Excerpt in *Arab News*, October 19, 1982

Spain

Deontological Code for the Journalistic Profession. Adopted by the Federation of the Spanish Press in Sevilla on November 28, 1993. Source: <http://www.uta.fi/ethicnet/spain.html>

Tunisia

Code of Ethics. Adopted by the Association of Tunisian Journalists, 1975. Source: Nordenstreng, 1989, pp. 177–178

Turkey

Code of Professional Principles of the Press. Adopted by the Press Council (*Basin Konseyi*). Source: Retrieved March 25, 2001, from <http://www.uta.fi/ehiticnet/turkey.html>

International Principles of Professional Ethics in Journalism

Adopted in 1983 by the fourth consultative meeting of UNESCO. Source: Retrieved March 25, 2001, from <http://www.unesco.org/webworld/com/compendium/1419.html>

United Kingdom 1

Code of Conduct. Adopted on June 29, 1994, by the British National Union of Journalists (NUJ). Source: Retrieved March 25, 2001, from <http://www.uta.fi/ethicnet/uk.html>

United Kingdom 2

Code of Practice. Ratified by the Press Complaints Commission on November 26, 1997. Source: Retrieved March 25, 2001, from <http://www.uta.fi/ethicnet.uk2.html>