

POLICY RECOMMENDATIONS 2013-2016

Since 2013, the South East European Media Observatory has been addressing obstacles to a democratic development of media systems in the countries of South East Europe. It has established its own research framework in order to map patterns of corrupt relations and practices in the media systems of these countries, but also to identify positive examples of protection of public interest in the media.

All of these efforts aimed at informing public debate and advancing media reforms in the countries of South East Europe.

At the beginning of the Observatory's research, in 2013/2014, we have introduced the concept of media integrity to denote the public-service values of media and journalism. Five countries were covered by the extensive research of media integrity – Albania, Bosnia and Herzegovina, Croatia, Macedonia and Serbia. The findings were published in the book *Media Integrity Matters – Reclaiming Public Service Values in Media and Journalism*. In that period, a number of brief reports (flash reports) were also produced tackling various issues of media integrity.

Kosovo, Montenegro and Turkey joined the SEE Media Observatory in 2015, and its action research has been extended to mapping ownership and financial relations in the media in these countries. Simultaneously, in 2015, state-media financial relations were studied in more details in Albania, Bosnia and Herzegovina, Macedonia and Serbia. Implementation of several regulatory provisions in the most recent media laws in Macedonia and Serbia was examined by the SEE Media Observatory monitoring in 2015.

Independence of media regulators and public service broadcasters were subject of the SEE Media Observatory monitoring in 2014 and 2015. In 2014, it covered Albania, Bosnia and Herzegovina, Macedonia and Serbia, while in 2015 it included also Kosovo, Montenegro and Turkey. The monitoring followed the indicators established in the *Guidelines for EU support to media freedom and media integrity in enlargement countries in 2014-2020*.

In early 2016, positive examples of media integrity protection have been presented in more details by the SEE Media Observatory through eight case studies covering six media outlets, a set of media policy measures, and an institution engaging into the anti-corruption work in the media system.

The role of editors in protection of media integrity in Albania, Bosnia and Herzegovina, Kosovo, Macedonia, Montenegro and Serbia has been in focus of the SEE Media Observatory research also conducted in early 2016.

All research reports of the SEE Media Observatory incorporated policy recommendations for further actions.

This paper will provide overview of the recommendations elaborated in the Observatory's research reports between 2013 and 2016. The recommendations will be presented for eight countries covered by the SEE Media Observatory in that period. However, after becoming an EU Member State, Croatia was not covered by the Observatory's research any more.

Several recommendations were excluded from the overview taking into account new developments in some countries which made them outdated.

ALBANIA

ILDA LONDO

MEDIA POLICY

1. Expanding the base of actors that contribute to media policy development, and ensuring through various discussion forums that their contribution, if relevant, becomes part of the legislation, would help enhance media policies and legislation adoption. Furthermore, the bodies responsible for drafting media policies should try to base their decisions on existing studies and research rather than solely on the feedback from actors that have vested interests.
2. Defamation has to be fully decriminalised.
3. The Freedom of Information Act's implementation has to be enhanced in order to serve the information needs.
4. The independence and authority of regulators should be strengthened by adopting formulas that limit political interference and pressure and by establishing a suitable funding scheme, while demanding their greater accountability to the public and increased transparency.
5. Civil society organisations should regularly monitor both the process of media policies drafting and their implementation in practice.

MEDIA OWNERSHIP

1. Transparency of official data provided by the regulator should be increased. The regulatory authority should establish an online register of the registered media outlets, listing ownership data and other relevant information.
2. The monitoring of dubious practices in ownership patterns should be increased. Apart from the regulatory body for broadcast media, this role can also be carried out by the competition authority, ensuring that controversial or hidden cases of ownership are investigated in a fair and transparent manner.
3. Cross-ownership rules should be reconsidered, given the tendencies towards concentration of the media market.

MEDIA FINANCES

1. The regulations on media advertising and public funds should establish clear, easy-to-follow criteria on how advertising is distributed. The allocation of public funds to media can also be “centralised” for one body to monitor and approve, such as the Public Procurement Agency.
2. Data on advertising and on media market should be made public by independent sources as well as official sources, and should be easily accessible to the public.
3. Joint industry initiatives should be promoted, aimed at increasing the transparency of the media performance, the advertising market, and other aspects of media finances.

PUBLIC SERVICE BROADCASTING

1. Political interference in the election of the Steering Council and in the daily operations of PSB should be eliminated.
2. The financing scheme of PSB should be improved and greater accountability in terms of finances, management, and fulfilment of the public service role should be required.
3. Practices that increase transparency of an institution vis-a-vis the public should be encouraged.
4. Amendments of strict legal and financial rules that might be restricting PSB in view of its specific nature should be considered.
5. Fair competition practices should be encouraged, to ensure that PSB and commercial media equally respect the rules (respect for intellectual property, respect for labour relations, etc.).

JOURNALISTS, EDITORS AND JOURNALISM

1. The Labour inspectorate should enforce the Labour Code in the media and closely monitor its implementation.
2. Professional journalism should be encouraged through competitions, distribution of awards, and other initiatives.
3. Regular debates and exchange among journalists should be promoted to keep alive the discussion on professional norms and potential self-regulation.
4. Improving overall functionality of the media market, in such a way that media outlets can operate as businesses, and no longer as extensions of politics or business.
5. Improving labour relations and the economic situation of journalists, which would lead to better functioning newsrooms and reduce current workload.
6. Have clearly written and specified public editorial policy for media outlets, which the editor and newsroom can follow, and that will be transparent for the public, too.

BOSNIA AND HERZEGOVINA

SANELA HODŽIĆ

MEDIA POLICY

1. Research results should be a basis for policy initiatives. Preferably, a regular system of data collection, research and analysis of various aspects of the media sector should be established and integrated in the decision-making process. For this to be achieved, the capacities for relevant analyses of media sector should be enhanced within the state institutions, academia and the non-governmental sector.
2. Mechanisms for the prevention of overt influence of political actors on the media sector should be enhanced, through guarantees of editorial independence (most of all, by ensuring that members of the regulatory body, PSB governing bodies, and managers/editors of media outlets are selected through an independent appointment procedure based on credentials, and by ensuring independent financing patterns). Finally, institutions relevant for the media sector (the Ministry of Communication, the Ministry of Finances, the Council of Competition, CRA etc.) should develop fiscal policies to enable media sustainability (tax subsidies, enabling advertising revenues for community media, etc.) and make media capable of producing plural and quality media content.
3. Existing laws should be enhanced to improve their clarity and assure their consistent implementation. For example, a more precise definition of “incitement to hatred” (in the Criminal Codes) and standards for establishing “emotional distress” (in the Libel Law) are needed. With regard to Freedom of Information Act (FOIA), more guarantees should be provided for the transparency of public information, including sanctions against the institutions that fail to act in accordance with the law (stipulated in the state FOIA, but not also in the entity FOIAs). This also includes better regulation of transparency and legitimacy of government funding for the media, as well as a review of the status of public local media.
4. Transparency of media businesses should be improved, most of all the transparency of ownership and financing patterns.
5. Capacities of different actors to contribute to a better implementation and development of media policies should be enhanced. This includes especially enhancement of CRA’s capacities and the protection of its independence in the context of current pressures on this institution. Civil society organisations should also be developing their capacities to inform and actively influence media policies instead of pursuing a reactive approach to precarious policy initiatives.
6. Civil society organisations, in cooperation with the Institution of Human Rights Ombudsman and international institutions, and possibly with other state institutions, should be involved in policy developments, in order to

prevent possibly detrimental policy changes (such as those that have been initiated recently) and to contribute to best policy solutions.

MEDIA OWNERSHIP

1. Transparency of official data on media ownership should be enhanced; more specifically, court registries of business entities in RS should provide the information through online platforms. The online register of businesses in FBiH provided by website www.pravosudje.ba is a good step forward; preferably, online registers should be centralised or linked to make access easier. The online register of broadcasters provided by CRA should include information on media owners.
2. Policies, the institutional and self-regulatory framework should be developed to address lack of transparency of online media. Researches of the websites operating as media businesses that have not been officially registered as such should be initiated; online media should be encouraged to publish information on ownership and contact information on their websites and to actively engage in the self-regulatory system to promote professional norms. Self-regulatory system should encourage websites to officially register and the advertising market should treat it as an absolute prerequisite for taking part in advertising contracts.
3. Mechanisms of control over the official vs. hidden owners and capital should be developed. The municipal courts should guarantee that all conditions are met for a media business to be registered, including the respect for rules on conflict of interests, as well as rules on foreign ownership; state authorities should investigate possible controversial, hidden ownerships; media and civil society organisations can play a major role in unmasking the “suspicious” ownership patterns and making public possible affiliations of owners.
4. The legislative framework should be reconsidered and enhanced in order to limit “indirect” foreign ownership that was identified in few major cases.
5. The rules on conflict of interest of media managers and editors should be enhanced to prevent:
 - The influence of public officials on the editorial policies of media that they do not officially own, but are presumably connected with (owned by family members, holding any kind of interest in the media);
 - The appointment of politically affiliated persons to the Board of Governors, or politically engaged editors; the opinion of media employees within both private and public media should play a role in the appointing procedures.
6. The legislation preventing the concentration of ownership should be adopted, in cooperation with the Council of Competition, CRA, Ministry of Communication and other relevant institutions.
7. The status of local public media should be resolved, in terms of assuring its public interest role (research and consultations with citizens and experts

to establish if the public interest is satisfied or how it can be better satisfied through these public media), editorial independence (mechanisms for securing independent appointing procedures and financing not dependent on arbitrary decisions of a current local government) and competition (the media industry and the Council of Competition should develop policies to assure that local public media do not constitute inadmissible competition to the local private media that are competing for the same advertising sources). These media could be partly transformed to become community broadcasters; they could be networked to reduce the production costs, transformed into local offices of PSBs and in part privatised.

8. Controversies related to the ownership of the measurement system provider should be resolved, i.e. the ownership of the audience data provider Audience Measurement should be made transparent.
9. The public should be acquainted with the ownership patterns that possibly influence media integrity. More precisely, civil society organisation should seek to do so through public debates on the political economy of the media, through critical analysis of media practices indicative of the conflicting affiliations of media outlets, through reactions to problematic appointments of media managers and editors, and other activities.

MEDIA FINANCES

1. Government institutions should be proactively publishing information related to media financing. All governmental institutions should be required to proactively publish such information, including regular budget funding, subsidies and advertising, which can be advocated in the context of implementation of the newly adopted Strategy and Action Plan for the Fight against Corruption. The Agency for Prevention and Coordination of the Fight against Corruption (APIK) can have an important role in advocating these changes. Transparency requirements can also be introduced as a required part of the internal statutes of institutions, through possible changes to the Law on Public Companies to increase transparency of advertising practices, etc.
2. Media outlets should publish information on any type of funding coming from government institutions. The rules and practices of the Communication Regulatory Agency (CRA) can be changed in order to publish such information in the centralised register of broadcasters administered by CRA. Furthermore, the associations of media outlets can introduce this requirement for their members. APIK can play an important role in advocating these changes.
3. The government funding for media should categorically be developed around the criteria of public interest. The inclusion of the criteria of public interest should be an obligatory requirement for every type of funding (grants and advertising) and every government institution.

4. Common understanding on all state levels of what makes “public interest” in these funding schemes should be assured. State and entity governments, as well as public institutions such as APIK and CRA can each play an important role. Public interest should be specified in order to limit misuse of this funding, but also should allow for a wide range of particular aspects of the public interest, depending on priorities in the specific community.
5. Allocation of government subsidies should be made on a competitive basis, under a public call, and within the above criteria of public interest, regardless of the type of media. In addition, the results of the any funded projects should be monitored and taken into account in future government funding.
6. Political bodies should not directly make decisions on government funding for media, in order to prevent political instrumentalisation. The possibility of introducing an independent body, a committee including a wide range of social actors, should be explored and advocated; alternatively, media regulator could lead the decision process.
7. Independent public funding for the production of content with public relevance should be provided at the state level. Part of the income collected from the telecommunication licence, or part of the collected VAT could form the basis for such funds.
8. Part of the government funding to the media should be directed towards support for training and permanent education of media professionals in terms of journalism and business skills. This can be done through support for professional associations or media training organisations.
9. The Council of Competition, the Communications Regulatory Agency, as well as media representatives and association should jointly reconsider the status of local public media and identify the best way to provide the missing guarantee of editorial independence, as well as to ensure the public interest role of these media outlets. One such guarantee of editorial independence could be multi-year funding, which would prevent funding from being made conditional on editorial support for particular political elites and affiliated business actors.
10. The state Parliament, in consultation with the managerial boards of the three public service broadcasters, should urgently find an efficient solution for the collection of RTV fees. Collection through electric bills should again be considered. In addition, to prevent further financial deterioration of PSB, an efficient share of the collected fee should be guaranteed, and finally the rationalisation of the system should be enacted.
11. The domestic advertising market should be protected from the excessive outflow of revenues to foreign markets. The media industry and audience data providers should maintain the practice of concealing information on the audience reach of foreign outlets in BiH; the media industry should also advocate for positive solutions on the international level and on the level of national policies.

12. The audience measurement system and use of measurement data should be enhanced. Improvements to the audience measurement system in the radio (people meters), print (circulations) and online media sectors (greater use of the system providing detailed information on user behaviour and demographics) would be beneficial to the promotion of media integrity, but depends on the business interests and financial capacities of media outlets.
13. The media industry should assure that the TV audience measurement is reliable and financially sustainable, which calls for independent audits, providing advertisers with substantiation of data reliability, as well as sustainable pattern of financing of audience measurement system.¹

PUBLIC SERVICE BROADCASTING

1. Guarantees against the politicisation of appointment procedures for the Board of Governors should be ensured: a) instead of the Parliament/ National Assembly having absolute power in the process (as in *RTVFBIH* and since recently in *RTRS*), CRA as an independent state agency should be preparing the list of candidates; b) the criteria for assessing the competences of candidates should be established in detail and implemented rigorously; c) the failure to appoint the best-ranked candidates should not be tolerated, i.e. the reasons for non-appointment should be established; d) possible politically motivated dismissal of the board members should be discouraged by establishing a transparent and well specified complaint procedure. The current trends seem to be opposite and seem to enable arbitrary decisions, which is why civil society initiatives are highly needed.
2. The guarantees of the autonomy of PSB through independent sources of revenues should be provided. Measures should be provided to assure that the government funding is not in any way conditioned, and direct public subsidies for “infrastructure and other technical costs” should be withheld (as recommended by Article 19 organisation) and dedicated instead to programme production. In sum, the legal framework and the implementation mechanisms should assure that the funds provided are sufficient for an optimal functioning of PSB.² Taxes should be determined based on the assessed need and in consultations with PSB representatives.
3. The proportion of advertising revenues should be limited in such a way as to ensure that a) the public service broadcasters are not overly dependent on advertising, and b) the private media are not unduly jeopardised by excessive advertising on PSB under circumstances possibly constituting unfair competition. However, these decisions should be delivered timely and only

1 In the meantime, one of them stopped providing audience measurement.

2 At the time of the report, in June 2016, the state level broadcaster *BHRT* announced that it will stop broadcasting because of financial difficulties. The other two public broadcasters, *RTRS* and *FTV*, failed to pay their debt to *BHRT*, despite the obligations provided in the Law on public broadcasting system.

if the sustainability of the PSB will not be jeopardised, i.e. if the public service broadcasters are provided with sufficient funds for their technical, administrative and production costs.

4. A corporation within the PSB system should be established in order to, inter alia, a) rationalise the costs of PSB, b) develop a common advertising strategy and practices of three broadcasters, c) coordinate all other activities related to the technological development and management of the transmission network, d) coordinate the steps leading to digitalisation. Advocacy for the establishment of the Corporation is hampered by the lack of political will among decision makers.
5. The public service remit should be elaborated and procedures to guarantee its fulfilment assured. The public service remit should reflect the complexities of the country and seek to satisfy the needs of all constituents of BH population; this could include the establishment of a monitoring system to assess how the programming obligations are fulfilled (perhaps through enabling CRA or civil society organisations to do the monitoring), and transparent procedures for complaints over PSB programmes. Consultations with citizens through (lawfully appointed) programming councils should play a substantial role in the process.

JOURNALISTS, EDITORS AND JOURNALISM

1. Funds for the production of media content of public significance should be provided, while assuring that the distribution of funds is transparent and based on programming criteria and public interest.
2. Advocacy for a better protection of the labour rights of journalists, and protection of media freedoms, through a constant monitoring of relevant cases, provision of support for journalists suffering pressures, and advocacy for respect of journalists' rights and autonomy.
3. A common platform should be set up in which all journalist associations would participate, advocating for common interests of all journalists in the country, regardless of entity and ethnic origin – for example, campaigning for transparency, self-regulation, media credibility and protection of journalists.
4. Promotion of trade union and professional organising among journalists, especially within private media where trade union organising virtually does not exist.
5. Promotion of the accountability of various social actors for pressures and attacks on journalists and media, especially accountability of public figures. This should include harsh public condemnation and legal proceedings in cases of attacks or pressures on journalists.
6. Media outlets, primarily the public ones, but also the private, should introduce/revise their internal documents in order to include/improve guarantees of editorial independence and thus restore their credentials and public trust. These changes of internal norms should include the following:

- Specifying the minimum level of education and extent of professional experience required for the candidates for the position of editors, as well as any additional credentials that will be preferred in the selection process. Participants in this research study placed special emphasis on the experience and education of editors;
 - Depoliticisation of the process of appointment of media managers, and subsequently of the appointments of editors in the media should be a long-term goal, but in the meantime professional credentials should be made at least equally relevant as criteria in appointment procedures;
 - A clear distinction between the position of media owners and media editors, one that would serve to demonstrate at least the minimum professional credibility of a media outlet;
 - Specifying any conditions that disqualify editors for a particular position, mainly in relation to possible conflict of interests, based on particular political affiliations and including interests in other, media-related businesses;
 - Introducing regular consultations with the journalists within the media outlet about specific appointments and dismissals, as an additional check on the professional integrity of the candidates/editors;
 - Detailed specification of which violations of editorial work duties would justify dismissal, in order to render obsolete arbitrary decisions of the management in this regard;
 - Changes to the internal norms of media outlets should be promoted by the associations of media and by associations of journalists. International donors, as well as local government institutions should require media to provide guarantees of editorial independence in place as a condition of eligibility for receiving any grants they offer to media outlets.
7. Media outlets should improve transparency concerning the position of editors. This would include not only adopting adequate norms related to appointment, dismissal, duties, and the rights and responsibilities of editors, but also making them easily available. They should actively publish information about calls for editors, the applicants, appointment procedures and decisions, as well as publish the biographies of current editors, and specific information about the reasons for any demotions or dismissals. Public media have particular responsibilities towards the public in this regard, but for private media this would also be a way to demonstrate their professional credentials and gain public trust.
 8. The labour contracts of editors should include a clause on editorial independence. This should be a matter of collective bargaining at the level of professional trade union organisations (FBIH and RS), but also at the level of trade unions in specific media organisations and by the associations of journalists.
 9. The pressures on editors through financial conditioning should also be prevented through structural changes in patterns of government financing for

the media. At the same time, donor support is an indispensable source of alternative financing that could facilitate greater editorial independence.

10. More consistent institutional support for editors exposed to pressures and attempts to influence their editorial decisions should be developed. This would include assurances that the judicial procedures related to the employment-related status of media editors will be treated promptly and with due attention. It would also mean assurances of legal support for editors in any conflict with the management, provided by the professional organisations. The safety of editors should be assured by state security bodies but also by the cautious practices of the media outlets and through support of other media (for example by republishing of information that led to the security threats, which would presumably defuse some of the threats against the particular media outlet/editor).
11. Continuing education for editors and potential future editors, involving up-to-date education in professional skills and techniques, including professional ethics, should be organised. This is a recommendation both for organisations that offer such training and for the international donors, but also for the editors themselves to seek and engage in opportunities for professional improvement.
12. Organising around issues related to the position and role of editors should be introduced. Editors should exchange experiences on any problems they face concerning their position and editorial decisions (some respondents recommended periodic meetings of editors) and advocate for change. Professional integrity should be put back on the table, discussed, defended and promoted through collective organising. Any substantial restoration of the role of editors and their public image can only be done from within the media community.

CROATIA

HELENA POPOVIĆ

MEDIA POLICY

1. A new Media Act should be formulated, since the current law has several setbacks.
 - It applies to all media in one part, and specifically to the press in the other. However, this distinction is often blurred and it requires a careful reading to estimate what applies to the press and what applies to all media, so these ambiguities should be eliminated and the provisions clearly defined.
 - The Media Act stipulates that the institution managing the Register of press media outlets and distributors in Croatia is the Croatian Chamber of Economy (CCE), an independent professional organisation

with compulsory membership of every company registered with the Commercial Court. This institution should not be in charge of the Register, nor should the print media be separated from other type of media. Rather, they should be integrated and be the purview of one regulatory body that would be in charge of all news media – television, radio, web portals, and the press.

- All media outlets are obliged to provide the CCE with data on media ownership and this data has to be published in the Official Gazette annually. However, the data is only searchable for individual media outlets and since there is no special issue published by the Official Gazette that would include all the annual changes, this search is complex and longlasting. The data should be more easily available to interested parties.
 - A new Media Act should include a provision that enables the regulator to erase from the Register the media that do not fulfil the provisions stipulated in the Media Act and do not respond to requests to do so (within a reasonable deadline).
 - The annual financial data that media organisations have to submit to the CCE and publish in their own media are meagre, unstandardised, incomplete and not easily found. The regulatory body should define a standardised form that would be easily accessible via the websites of all the media outlets.
2. The capacities of the regulatory bodies should be strengthened in order for them to be able to monitor the media landscape in accordance with legislation. They should also connect more with public research institutions in performing these tasks.
 3. The work of the regulatory bodies should be more carefully monitored and they should be held liable in the case of breach and/or inefficiency.
 4. The conduct of media owners should be consistently monitored and, in the case of breach of the rules, penalised in accordance with the legislative provisions.
 5. Commercial actors that indirectly influence media operations such as advertisers, marketing agencies, public relations agencies, as well as banks involved in media business should become a part of regulatory provisions in a way that limits their impact.

MEDIA OWNERSHIP

1. Further limits on media concentration (including vertical and horizontal) should be introduced.
2. Clear and consistent database on ownership structure should be provided on the web page of the regulator, with a user-friendly interface for easy access and identification of connected persons.
3. News media should be granted specific status (differentiating them from other organisations operating on the market) tied to restrictions on the

broadening of ownership to the fields other than media-related (news media cannot be just another commodity).

MEDIA FINANCES

1. The Fund for Pluralism should be restructured and all news media should be enabled to apply for resources, regardless of the platform (as long as they produce public service content).
2. More sustainability programmes should be set up for non-profit media, not only in terms of direct funding but also organisational support (premises etc.).
3. Higher VAT rate should be applicable to entertainment content in news media.

PUBLIC SERVICE BROADCASTING

1. The transparency of the PSB finances and programming should be ensured. All relevant documents should be available on their website.
2. Expenses of the PSB should be streamlined but in a way that would not affect the public role of the PSB in ensuring quality content.
3. News programmes should be improved; these should not mimic commercial television but insist on news according to professional standards rather than pursuing audience share goals (more international news, less soft news etc.).

JOURNALISTS AND JOURNALISM

1. The Croatian Journalist Association (CJA) should make the membership more restricted in the sense that being a member implies that ethical standards are followed. A breach of professional standards should be penalised. Homogenisation of journalists via different mechanisms should be one of the tasks of the CJA.
2. Legal support should be provided to journalists who do not have this type of support through a media organisation.
3. Media practices and content should be consistently monitored by a public research institution (clearly defined methodology, consistent monitoring and creating an archive) financed by the Ministry of Culture/State, in order to be able to allocate funds from the budget to media that operate in accordance with their public role.

KOSOVO

ISUF BERISHA

MEDIA POLICY

1. The Independent Media Commission (IMC) together with associations of journalists, should take a leading role and organise structured and informed debate among the media community, legislators and the public on the

challenges posed by the new online media both for media development and for society in general.

MEDIA OWNERSHIP

1. Kosovo legislators and the IMC should pay much more attention to transparency of media ownership and media concentration. The IMC should take a leading role and initiate public debate on these issues, in order to engage both the media community and legislators.
2. The IMC should re-launch its initiative to adopt new regulations on media ownership and concentration.
3. The EU Commission should raise issues concerning the transparency of media ownership and media concentration in its dialogue with the Kosovo government on the criteria for the progress in the EU integration.

JOURNALISTS, EDITORS AND JOURNALISM

1. There is a need for more research based on a larger sample of journalists and editors regarding various aspects of their situation. AJK should take the lead in this regard.
2. Journalists' associations should organise an informed solution-oriented debate on the current unsatisfactory situation of Kosovar journalists and editors.
3. Advocacy campaigns for better implementation of the legislation affecting media operation and the situation of journalists and editors should be organised by journalists' associations.
4. The Kosovo Labour Inspectorate should pay much more attention to the implementation of Labour Law at media organisations.
5. Journalists' associations should organise advocacy and public awareness-raising campaigns to draw attention to the current tendency towards political and economic influence over the media, with the aim of increasing public pressure on those involved to cease such activities.
6. Media associations and civil society should support those RTK editors and journalists who are struggling to defend their professional integrity against political and economic pressure.
7. The European Commission should pay more attention in dialogue with the Kosovo government to the issues of political and economic influence over the media, together with the problem of inadequate implementation of the laws affecting media operations and the situation of Kosovar journalists and editors.

MACEDONIA

SNEŽANA TRPEVSKA, IGOR MICEVSKI, VESNA NIKODINOSKA AND
LJUBICA GROZDANOVSKA-DIMISKOVSKA

MEDIA POLICY

1. The merit-based system, established in the Law on Audio and Audiovisual Media Services, shall be fully and impartially applied in the appointment procedures for the members of the governing body of the Agency for Audio and Audiovisual Media Services. Each nomination for the members of the governing body shall be publicly discussed and examined during the appointment procedure in the Parliament taking into account expertise, qualifications, exceptional achievements and credibility of the candidates for the work entrusted to the governing body and for strengthening the public interest within the mission of the regulator.
2. The Agency needs to demonstrate full transparency of all decisions and activities, providing clear explanation, particularly for the actions which are disputed. The regulator may restrict access to information only for strictly confidential matters, applying the public interest values in the first place.
3. The license-awarding decisions of the Agency should be taken in an open, transparent and impartial manner and should be open for public scrutiny, thus minimizing the possibilities for political pressures and influence.
4. In the license-awarding process the Agency should take into consideration the level of political pluralism and take measures for its strengthening, particularly in the TV sector.
5. The Agency should further strengthen its role in the media system by developing and sharing its expertise, data and analyses. Benefiting from increased public exposure, it can gain public trust and use it to protect own independence against particular political and business interest, and to educate the public.
6. The concept of political pluralism should be clearly defined in the legislation and an obligation for the regulator should be included to monitor and to assess the level of political pluralism in the media.
7. The Ministry of Information Society and Administration should announce the public call for production of domestic documentary and film programmes at the end of the year, thus providing broadcasters a period of a year for producing and broadcasting the domestic programmes next year.
8. The Government should make public the composition of the Commission, the main documents related to its work and the ranking criteria of its decision-making process.
9. The Commission's composition should be revised; it should be independent expert body, instead of the Government-established and composed body, thus guaranteeing impartial selection and distribution of funds for production of high quality projects.

10. Strong and independent monitoring (by academic and expert bodies, or NGOs) of the work of the regulators in order to make them “aware and more accountable” to the public.
11. Support should be provided to reliable and independent academic research and engagement of the academic community in the critical public debate on media policy issues.

MEDIA OWNERSHIP

1. The audiovisual regulator should be legally obliged to investigate the hidden connections between the audiovisual media and politicians and to publish at least four times a year brief media ownership reports including official data and the information from the Central Registry Database System on all companies and individuals that are connected with the AV media outlets.
2. Independent controlling monitoring systems should be established by the NGO sector, in order to track and publish the media ownership data in all media sectors (audiovisual, print and online media).
3. The Press Council should expand provisions in the Code of Ethics in order to encompass the issue of media transparency in the online media sector; online news and information media should be part of the self-regulatory system and should therefore undertake voluntarily the obligation to regularly publish on their websites data on their ownership and sources of funding.

MEDIA FINANCES

1. State advertising in the media should be limited only to campaigns of public interest; it is necessary to clearly define what constitutes public interest.
2. State advertising in the audiovisual and print media should be banned with the Law on Media and Law on Audio and Audiovisual Media Services.
3. The audiovisual media should be legally obliged to provide and publish detailed data on financial sources, stating details of the ten largest sources of finance in the previous year; the audiovisual regulator would be obliged to monitor this obligation and to publish brief reports on its website.
4. The Commission should make public the information about the selected projects and the amounts awarded to every TV station for production of domestic documentary and film programmes, complemented with detailed explanation on the ranking decision.
5. Reforms are necessary in order to establish an independent and sustainable funding model for the public service broadcaster, *MRT*. The reform process should engage media experts in the first place while political parties should keep their role limited to the parliamentary procedure.
6. Despite other sources of financing, the PSB should make use of the state subsidies for producing programmes of public interest that otherwise commercial TV stations would not be interested in.

7. The subsidies for support of domestic production should be extended to regional and local media because of the scarcity of their resources for own production of quality and diverse programmes.

PUBLIC SERVICE BROADCASTING

1. Independent research or monitoring systems are needed to critically assess how the legally prescribed institutional autonomy of the managerial bodies is implemented in practice; this assessment should also take into consideration whether the individuals in *MRT* bodies are elected transparently and on the basis of their experience, knowledge and reputation in public.
2. Transparency of the decision-making process and of the financial work of the public service should be improved; all information and documents related to the work of managerial bodies should be published on the *MRT* website.
3. Continuous monitoring and open public debate are necessary in order to critically approach the changes and amendments to the legislation which affect the performance, operation and funding of the *MRT* as well as overall media market in the country.
4. The Parliament should organise annual public hearings on the basis of the analyses of the fulfilment of *MRT* programming functions conducted by the audiovisual regulator and/or independent expert analysis.

JOURNALISTS, EDITORS AND JOURNALISM

1. The self-regulatory system at the level of the entire media sector (Press Council) should be further strengthened; the body should consist of experienced and nonpartisan journalists and of well-known experts and academics.
2. The Press Council (or other independent media organisation) should make attempts to convince the media outlets that support the self-regulation system to establish internal mechanism of self-regulation (ombudsmen, editors for dealing with citizens' complaints etc.).
3. Further strengthening of the civil society sector and professional media organisations is of great importance, since these organisations directly support journalists and their rights and freedoms.
4. Trade Union of Journalists and Media Workers should be supported in its efforts to introduce minimum labour rights for journalists as a precondition for their independence and freedom.
5. The Independent Union of Journalists and Media Workers should proactively negotiate and push for signing collective agreements between the Union and the media owners. The collective agreements should further protect the editors' position in the media.
6. The editors' position, responsibilities and independence from any internal or external pressures in performing their work in the media should be guaranteed with a signed agreement between the media provider and the editor.

7. The editors should cooperate more closely with the Council of Media Ethics of Macedonia and accept its decisions and criticism, thus demonstrating their commitment to working in a professional manner for the public good.
8. The professional media and journalist associations should strengthen their capacities and intensify their activities in order to protect the editors and advocate their professional independence in the newsrooms.
9. Professionals with integrity, who are impartial and independent of political, commercial and other influences, should be appointed as editors in the *Macedonian Radio and Television*, thus being able to create editorial policy that will keep the public interest in focus.
10. Editors and those journalists with high professional integrity should establish an independent formal or informal network in the frame of the existing bodies (e.g. self-regulatory bodies) that will pursue and advocate respect for the principles of independence, professionalism and high ethical standards.
11. Informal, specialised education and international exchange programmes for editors should be offered on a more frequent basis by media and training centres. Such educational and exchange programmes should provide editors with opportunities to improve, advance and refresh own professional capacities and identity, knowledge and skills for leading the modern newsrooms.
12. Quality journalism education should be further enhanced; there are developed curricula for journalism education, but the interest in journalism studies among youngsters is very small.
13. Independent advocacy and scientific research should be supported in the field of journalism.

MONTENEGRO

DANIELA BRKIĆ AND DANIELA VRANKOVIĆ

MEDIA POLICY

1. The government should extend the mandate of the Commission to monitor the work of the competent authorities in investigating cases of threats and violence against journalists, murders of journalists and attacks on media property so that it can continue to carry out its work.

MEDIA OWNERSHIP

1. The media registry, which contains data on the ownership structure of the print media, kept by the Ministry of Culture, should be made publicly available.
2. Special regulation, including rules of foundation, transparency of ownership and definition of illegal media concentration should be introduced for online news media by the competent Agency for Electronic Media (AEM).

3. Provisions on illegal ownership concentration that would prevent concentration of ownership in print media should be introduced by the amendments to the 2002 Media Law.

MEDIA FINANCES

1. Legal framework should be amended to provide for transparency of public spending for advertising.
2. Rules on state advertising should be introduced so as to provide clear and fair criteria for its distribution. All data on tenders, procurements, funds and other information on state allocation of funds to the media should be made transparent. This should be regularly published and monitored by either public procurement control bodies, or the media regulator, provided that such competencies with this body are created.
3. The proper implementation of provisions of the Law on Prevention of Illegal Business regarding the obligation of the media to report to the tax authorities on purchase of advertising space and services should be ensured by implementation of the prescribed sanctions. Furthermore, those data should be summarised and published on regular intervals.
4. AEM should introduce regular and reliable audience measurement sessions at least once a year, and regularly publish monitoring reports on the implementation of programme standards in the media, including those on percentage of own production in broadcasted programme.
5. More efforts should be made in the control of media revenues, competition on the media market and distribution of the state advertising funds. This should be done by strengthening the competencies of the current competition protection body, or by giving those powers to the media regulator.

PUBLIC SERVICE BROADCASTING

1. The funds supporting the public interest programming content should be made available to the media. In doing so, special attention will have to be paid to how the funds will be distributed lest this be turned into a mechanism of pressure against the media.
2. Amendments to the public service broadcasting law regulating the funding of the public broadcaster proposed by the government have to be adopted. The public service needs a steady and secure income.
3. Amendments to the public service broadcasting law prepared by a group of NGOs should be taken into account – the source of income (the state budget) affects independence of the Montenegrin public service broadcasting. Changes in the governing structure of *RTCG*, including the structure of the *RTCG* Council, should also be discussed, aiming to protect editorial independence of the public broadcaster.

JOURNALISTS, EDITORS AND JOURNALISM

1. Media Law amendments proposed by Human Rights Action, stressing the importance of the editors' role, should be considered and discussed.
2. Liability of editors in cases when the programme content violates the defined rules of the profession has to be emphasized. Editors should have the last say.
3. The media industry and policy makers should introduce a clear separation of the positions of director/manager from that of the editor through regulation or self-regulation.
4. A unity of media community on self-regulatory mechanisms is needed. Assistance, support and facilitation by international organisations to unite a divided media community would be welcome.
5. Support of international organisations is needed in providing training and organising courses, seminars and exchange programmes to raise awareness of potential conflict of interest situation and other issues related to professional integrity of editors.

SERBIA

JOVANKA MATIĆ, DUBRAVKA VALIĆ NEDELJKOVIĆ AND BOJANA BARLOVAC

MEDIA POLICY

1. The National Assembly's Culture and Information Committee should organise annual discussions on the situation of media freedoms in the country.
2. The Ministry of Culture and Information should elaborate a democratic and transparent procedure for drafting media legislation that involves all relevant stakeholders. A public hearing of a draft law in the Serbian Parliament's Culture and Information Committee should be part of this procedure. A drafting process should be preceded by analytic studies of relevant issues.
3. The Ministry of Culture and Information should establish regular channels of dialogue with relevant stakeholders that will effectively influence its agenda.
4. The Republic Broadcasting Agency (RRA) should introduce public hearings as a method of its work, with participation of all relevant stakeholders. Public hearings should be mandatory before RRA makes final annual plans of work, before it submits annual reports of work to the parliament and before RRA takes decisions concerning media with national frequencies.
5. The Republic Broadcasting Agency should increase its capacities for making qualitative analysis of trends in the media sector and studies of the effects of its regulatory decisions.
6. The regulator should hold responsible *RTS* for fulfilling its PSB remit, which includes provision of content in minority languages.
7. The Republic Broadcasting Agency should make qualitative assessments of the fulfilment of PSB remit by *RTS* and *RTV* (for example of political

neutrality, pluralism of voices and ideas, coverage of activities of CSOs, satisfaction of needs of ethnic minorities).

MEDIA FINANCES AND OWNERSHIP

1. The Commission for Protection of Competition should make a study of concentration trends in the media market on the national and regional level as soon as possible.
2. The Ministry of Culture and Information should create a database on all relevant aspects of the media industry, that are currently unknown.
3. The Ministry of Culture and Information should assess the situation on the media market, the citizens' needs and what kind of media programming (content) is missing. Based on that, it should conduct an analysis of the effects of the project co-financing every year and then establish the criteria for a new call.
4. Journalists' associations should compile a list of knowledgeable experts and train them to be members of the commissions tasked with deciding on the distribution of public funds for project co-financing of media programmes of public interest.
5. Local self-governments should make the process of co-financing transparent by publishing all information related to the call for proposals and its results on their website, and introducing lower thresholds to prevent the practice of granting too little funds to too many projects.
6. All media should make public the information about all public funding they receive. Equally, all state institutions and public companies should make public the information about each and all funding allocated to the media.
7. Media-tax debtors and those not paying fees to regulatory bodies should not be allowed to apply for project co-financing from the state budget or gain advertising from the state/public bodies and companies.
8. The government should provide additional financial support for privatised media in minority languages, such as tax relief, in order to improve their difficult market position due to limited audiences.
9. Councils of national minorities should support the media in minority languages from their own revenues and provide them with logistical assistance.
10. A new Law on National Councils of National Minorities has to be drafted, with a wide participation of all stakeholders. This Law should provide ground for equal conditions of development of rights of national minorities and elaborate rights and obligations of minority councils regarding the media they found and own. Minority councils should be held accountable for spending public funds for functioning of media in minority languages. Relations between minority councils and employees of these media should be arranged in such a way as to prevent interference in journalist autonomy.

PUBLIC SERVICE BROADCASTING

1. Modality of independent financing of public service broadcasters (licence fee collected from citizens) established by the Law on Public Service Broadcasters should be strictly respected. The mechanisms for efficient collection of the fee have to be established by the government in consultations with the public broadcasters, but also civil society and independent experts.
2. The editorial, management and governing structures of both public service broadcasters in Serbia should adopt editorial policy values and introduce mechanisms for control of their implementation to provide that the public interest provisions from the 2014 Law on Public Service Broadcasting are strictly applied. Within the process of adoption of these values and mechanisms the public debate should be organised, enabling various parts of the society to contribute. The efforts should be made by public broadcasters to invite and encourage citizens – viewers and listeners – (for instance through campaigns in the programs of PSBs) to contribute their views and suggestions.
3. Respect for and promotion of political, cultural and geographical pluralism should be strongly integrated in the editorial policy values of public service broadcasters, and its implementation regularly checked by editorial and programming governing bodies of the broadcasters. The observations of citizens in this area should also be checked through surveys or focus groups, and the findings used by editorial and governing bodies in their evaluations and strategic planning.
4. When preparing and adopting the 2016 annual plans in terms of finances and programming, the editorial, management and governing bodies of both PSBs should strategically allocate significant portion of finances and time in the programming schedules for analytical and complex journalistic genres, specifically supporting investigative journalism. Public service newsrooms should employ the best investigative journalists, form a section of investigative journalism, and support their work in order to full a watchdog role of the public media and serve the public interest.
5. Governing bodies of public service broadcasters should launch a campaign educating the audience on the unique nature of public service broadcasting and on the importance of licence fees as its major source of revenues. An element of the campaign should be regular reports to audiences on the way subscription fees are spent.
6. Governing bodies of public service broadcasters should use the existing research capacities of RTS and RTV and launch regular and extensive surveys of citizens' expectations about public service broadcasters. They should also take measures to increase effective communication with audiences and analyse the audience feedback on the programming.
7. Technical and technological possibilities offered by digitalisation shall be used by public service broadcasters for advancing the program diversity and greater cooperation with the media in the region and in the EU. This

should lead to better integration of the Serbian PSBs programming in the EBU as a relevant partner to offer quality content of regional and European relevance for exchange.

JOURNALISTS, EDITORS AND JOURNALISM

1. Professional journalists' associations should launch a public campaign for the promotion of socially responsible journalism, coordinated with the already launched campaign against harassment of journalists. It should involve public discussions with all relevant stakeholders, especially representatives of the audience.
2. Broadcast media, owners and journalists should establish a self-regulatory body for monitoring respect of the Professional Code in broadcast media. It should be financed from licence fees paid by broadcast media.
3. The government should initiate a process for signing a collective agreement for media industry workers that should protect the rights of all sides.
4. The Media Coalition (an informal organisation of several journalists' and media organisations) should initiate efforts to establish a new National Trade Union of Journalists, not connected to any existing professional organisation, free of political agenda and aimed exclusively at the protection of labour and social rights of journalists through collective agreements and labour agreements with media owners. The new trade union could engage volunteers, retired journalists with high professional reputation, as promoters of the initiative. The new trade organisation should apply for initial funds with foreign donors, especially the EU funds and ask for help from foreign media owners.
5. Training programmes should be focused on the media management and marketing.
6. Editors-in-chief should establish an association and use it as a tool for improving their legal, economic and professional position. The association should strive towards protecting media integrity and ask for support from the media freedom defenders whenever the media is exposed to pressures on editorial policy.
7. Media legislation should better balance the rights and obligations of editors-in-chief and provide enhanced protection of their professional rights, rights which are now only formally listed but not efficiently defended.
8. Public service broadcasters should make the procedure for the appointment of editors-in-chief as transparent as possible. This could ensure selection of the best candidates, diminish the ground for election along political lines and increase audience trust in the public service broadcasters.
9. The Independent Association of Journalists of Serbia (NUNS) should better promote its proposal for a specific work contract for editors-in-chief and lobby for its adoption in media that strive to protect media integrity, especially in public service broadcasters.

CIVIL SOCIETY, ACADEMIC RESEARCH AND INTERNATIONAL SUPPORT

1. Civil society organisations, as the authentic ally of media working in public interest, should increase their capacity of overseeing media policy mechanisms and representing the voice of citizens.
2. Civil society organisations should examine the reasons for low effects of participation of citizens' and CSOs' representatives in the work of the regulatory body and in counselling bodies of public service broadcasters, and formulate concrete proposals to improve them.
3. A strong academic centre specialised for media research should be established, with the help of the Ministry of Culture and Information, university institutions, media industry and donors.
4. International organisations should provide support and financial assistance to news media in Serbia, especially those that practice socially responsible and investigative journalism.

TURKEY

ASLI TUNÇ

MEDIA POLICY

1. Appointment processes for the regulatory agency (RTÜK) should be structured so as to minimize political influence over appointments.

MEDIA OWNERSHIP

1. The government must introduce laws limiting media cross-ownership in order to establish diversity, fair competition and pluralism in the media sector.
2. The media owners must be exempted from participating in public tenders and making financial deals with the government.

MEDIA FINANCES

1. The government should stop using the threats of tax inspections and prosecutions as a tool to control and intimidate the media. The enforcement of tax legislation should be as transparent as to avoid its misuse in targeting media outlets critical to the government.

PUBLIC SERVICE BROADCASTING

1. The state broadcaster *TRT* and the state news agency *AA* should be radically re-formed and turned into a genuinely independent public service.

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