

# MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

## APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2022

Country report: Croatia

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**Research Project Report**

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# 1. About the project

## 1.1. Overview of the Project

*The Media Pluralism Monitor (MPM) is a research tool that is designed to identify potential risks to media pluralism in the Member States of the European Union and in Candidate Countries. This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2022. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.*

## 1.2. Methodological notes

### Authorship and Review

*The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.*

*In Croatia the CMPF partnered with Pasko Bilic (Institute for Development and International Relations), Monika Valecic (Independent researcher), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annex II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.*

*Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).*

<b>Fundamental Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

### The Digital Dimension

*The Monitor does not consider the digital dimension to be an isolated area but, rather, as being intertwined with the traditional media and the existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digitally specific risk scores, and the report contains a specific analysis of the risks that related to the digital news environment.*

## **The Calculation of Risk**

*The results for each thematic area and Indicator are presented on a scale from 0 to 100%.*

*Scores between 0% and 33%: low risk*

*Scores between 34% and 66%: medium risk*

*Scores between 67% and 100%: high risk*

With regard to the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

## **Methodological Changes**

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. For the MPM 2023, no major changes were made to the questionnaire, except for the Indicators Transparency of Media Ownership, Plurality in Digital Markets and Editorial Independence from Commercial and Owners Influence (Market Plurality area), and Protection Against Disinformation and Hate Speech (Social Inclusiveness area). The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

In the Market Plurality area, the names of three Indicators have changed. The former indicator on "News Media Concentration" is now named "Plurality of Media Providers"; "Online Platforms and Competition Enforcement" has been renamed as "Plurality in Digital Markets"; "Commercial & Owners' Influence Over Editorial Content" has been renamed as "Editorial Independence from Commercial and Owner Influence".

**Disclaimer:** The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2023 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2023, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

## 2. Introduction

- **Country overview.** Croatia has a population of 3.8 million, according to the 2021 census (Croatian Bureau of Statistics, 2022b). The population has been steadily decreasing since the 1990s. In the 1991 census, the total population was 4.7 million, 4.4 in 2001, and 4.2 in 2011. Geographically, the country is situated between Central Europe, the Mediterranean and Southeast Europe, with a long coastline along the Adriatic Sea.
- **Languages.** The primary spoken language is Croatian.
- **Minorities.** Croats make up more than 90 per cent of the population. The country is seeing an increasing influx of foreign workers, traditionally from Bosnia and Herzegovina, Serbia, Northern Macedonia and Kosovo. There is also a noticeable trend of workers from Nepal and the Philippines. There are 22 constitutionally recognised minorities: Albanians (0,36%), Austrians (0,01%), Bosnians (0,62%), Bulgarians (0,01%), Montenegrins (0,08%), Czechs (0,20%), Hungarians (0,27%), Italians (0,36%), Jews (0,01%), Macedonians (0,09%), Germans (0,08%), Poles (0,02%), Roma (0,46%), Romanians (0,01%), Russians (0,04%), Rusins (0,03%), Slovaks (0,10%), Slovenians (0,20%), Serbs (3,20%), Turks (0,01%), Ukrainians (0,05%), Wallach (0,00%) (Government of the Republic of Croatia, 2023).
- **Economic situation.** In 2022, the Croatian GDP grew by 6,3% (Croatia Bureau of Statistics, 2023b). There was a slight increase in employment, just above 1%, between January and September 2022. In September 2022, the unemployment rate was 6.1 % (Croatian Bureau of Statistics, 2022a). At the same time, the inflation rate was 13.1% in 2022 (Croatian Bureau of Statistics, 2023a). The advertising markets grew after the COVID-19 downfall in 2020 (-11 percentage points).
- **Political system.** Between 1945 and 1991, Croatia was one of the six federal republics of the Socialist Federal Republic of Yugoslavia. After the wars of the dissolution of Yugoslavia and since Croatian independence was declared in 1991, the HDZ (centre-right/right-wing) party has won most parliamentary elections. The only other party that managed to form a government by winning the elections was the Social Democratic Party (SDP). The Party formed the government once between 2000 and 2003 and the second time between 2011 and 2015. The Croatian Democratic Union (HDZ), in coalition with minority representatives, liberal democrats (HNS), and Reformists, formed a government after parliamentary elections held in July 2020.
- **Media market.** In 2021, the total advertising market increased by 18 percentage points and in 2022, by 5 percentage points. The print market decreased by nine percentage points between 2022 and 2021 (HURA, 2023). The primary sources of information about social and political events are television (60,3%), internet portals (48,1%), social media (33,9%), and radio (32,9%) (Perišin, 2021).
- **Regulatory environment.** The media sector is within the purview of the Ministry of Culture and Media. The Council of the Agency for Electronic Media (AEM) is the main regulatory body. There is no regulatory body for the print media. Print media report ownership changes to the Croatian Chamber of Commerce (HGK). The primary professional association protecting the interests of journalists is the Croatian Journalists' Association (HND). One of the most significant issues is the continuing presence of strategic lawsuits against public participation (SLAPPs) in recent years. According to a survey by the HND (2022a), there were 951 active lawsuits in March 2022. Of them, 928 relate to defamation charges against publishers, editors or journalists. Some of these lawsuits were strategically raised in large

numbers by individuals from public life, politicians and judges. Although there is no clear definition of SLAPP at the EU or national level, the misuse of defamation charges poses a problem to journalism and freedom of expression. The Ministry acknowledges the problem and has started organising educational workshops for members of the judicial system and the media. The Ministry is creating a National Plan for the Development of Culture and Media between 2023 and 2027.

### 3. Results of the data collection: Assessment of the risks to media pluralism

Croatia has a medium risk score in all four areas: fundamental protection (47%), market plurality (66%), political independence (57%) and social inclusiveness (59%). The results show a slight increase in risk for the area of fundamental protection and a slight decrease in the areas of political independence and social inclusiveness. The variability mainly reflects small methodological changes in the areas of market plurality, political independence and social inclusiveness.

An indicator of high risk in the area of fundamental protection is the journalistic profession, standards and protection. According to research by the Croatian Journalists' Association (HND), in March 2022, there were 951 active lawsuits demanding compensation in the total amount of HRK 77.4 million (HND, 2022) or about 10 million euros. Of these, 928 refer to accusations of defamation against publishers, editors or journalists. Some of these lawsuits were strategically initiated in large numbers by individuals from public life, politicians and judges. The Ministry of Culture and Media recognizes the problem and has started organizing educational workshops for members of the judiciary and the media. The independence and effectiveness of the media increased from low risk to medium risk between 2022 and 2023. The Electronic Media Act 2021 included platforms for the exchange of audio-visual content (Article 95) within the regulatory responsibility of the Council for Electronic Media. However, no sanctioning powers have been delegated to the regulator. In addition, there is no definition of platforms for the distribution of news and information on current events, which is a significant deficiency in the Croatian regulatory framework. The problem of politicized appointments has not been addressed.

Indicators of high risk in the area of market plurality (66%) are the plurality in digital markets and editorial independence from commercial interests and owners. The online advertising market is not regulated by media laws. Taxation of digital services is not part of the public or political debate in the country, and market data for digital intermediaries does not exist. Most information on media ownership is easily available and searchable on the website of the Agency for Electronic Media. Ownership structures of newspapers are somewhat more difficult to access because they are monitored by the Croatian Chamber of Commerce. The Electronic Media Act (Official Gazette 111/21) introduced stricter rules on media ownership transparency. However, ultimate beneficial owners can sometimes be hidden behind business entities, especially for larger transnational companies.

In the area of political independence (57%), high-risk indicators include political independence of the media and editorial autonomy. Political dependence is visible in all types of media, especially at the regional and local levels. Due to the general lack of sources of income and financial stability, the media may depend on funding from city or county sources. Media statutes and ethical codes are very ineffective in ensuring editorial autonomy. This indicator consistently shows the highest risk over time, which indicates the ineffectiveness of self-regulation and the need to find different models for ensuring editorial autonomy.

In the area of social inclusiveness (59%), two indicators, representation of minorities in the media and media literacy, are associated with a high risk. Gender equality has been reduced from high to medium risk compared to last year. The representation of minorities on PSM channels is not proportional to their size. Legally unrecognized minorities in practice do not have access to airtime on PSM channels. Croatia still has not implemented the EU Directive 2019/882 on accessibility for products and services for people with disabilities. Despite the activities of the primary regulator in media literacy and non-governmental organizations covering various issues, there is no national and comprehensive strategy aimed at the media literacy of the general population. It is necessary to ensure a wider application of media literacy through appropriate education and training of teachers in primary and secondary education. Media and digital



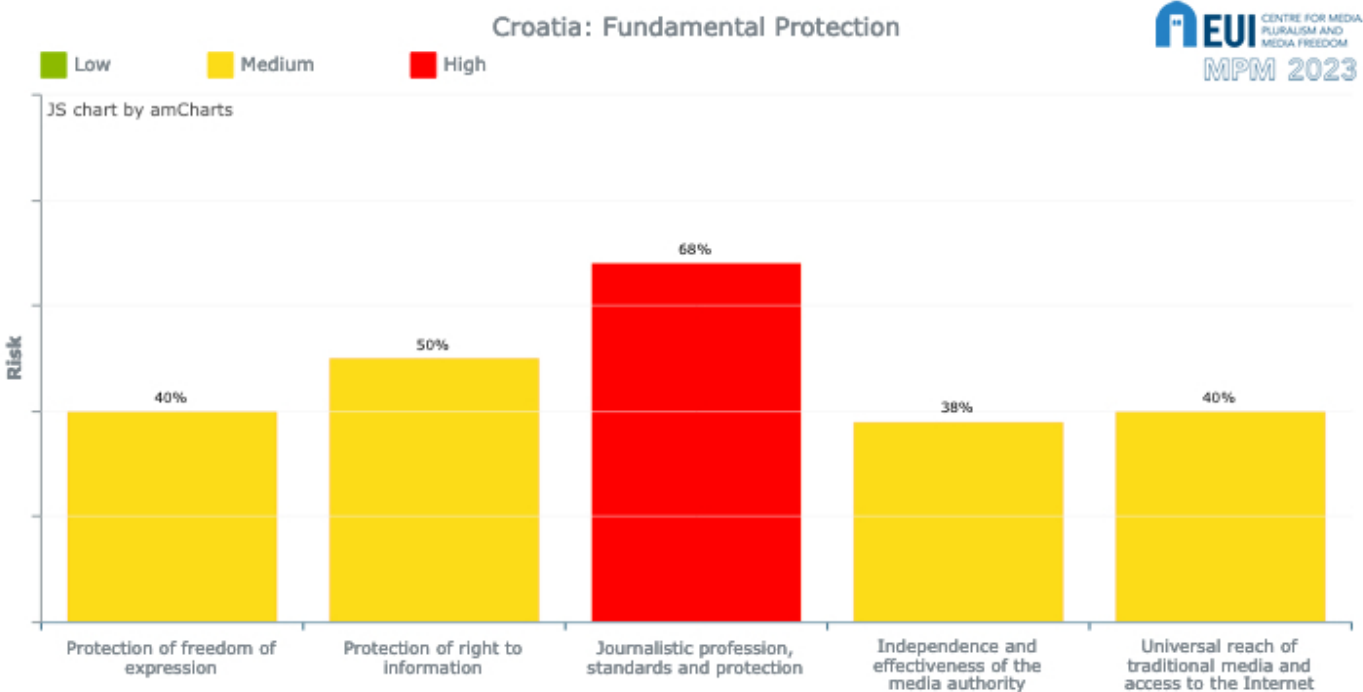
literacy are mentioned in the National Development Strategy until 2030 (Croatian Parliament, 2021) and the Recovery and Resilience Plan 2021-2026 (Government of the Republic of Croatia, 2021). It is not publicly known what the role of media literacy will be in the National Plan for the Development of Culture and Media from 2023 to 2027.

### **Focus on the digital environment**

The digital environment has a higher risk in the areas of fundamental protection (57%) and market plurality (69%) and a lower risk in the areas of political independence (34%) and social inclusion (50%). Threats to journalists online, especially on social networks, occur regularly. Insults and misogyny are common. The distinction between criminal offences and national security and defence cases in data retention legislation should be made clearer and less ambiguous. Electronic publications do not have horizontal concentration rules (equity share). In general, the rules of concentration are much more unclear in the digital environment. There is no public body responsible for collecting and monitoring the online advertising sector. There is no legal definition of online platforms other than platforms for the distribution of audio-visual content in accordance with the transposed AVMS Directive. The ownership structure of right-wing digital media is generally less transparent – the ultimate beneficial owners may be hidden and represented by other legal entities. It seems that this practice is most prevalent among news portals with extreme political rhetoric. Misinformation and hate speech are rampant on the internet. In 2023, new projects fighting disinformation funded by the National Plan for Recovery and Resilience (2021-2026) will be implemented, developing various technical systems and computational methods. Given the novelty of the mentioned projects, it is difficult to estimate their expected effect.

### 3.1. Fundamental Protection (47% - medium risk)

The Fundamental Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have the competence to regulate the media sector, and the reach of traditional media and access to the Internet.



The Fundamental Protection area scores medium risk of 47%, a slight increase from the 2021 assessment of 43%. The Journalistic profession, standards and protection indicator and the Protection of the right to information indicator remain the same. Protection of freedom of expression, Independence and effectiveness of the media authority and the Universal reach of traditional media and Access to the internet indicators all saw increased risk assessment. The risks increased due to the Russian television station ban and the media authority's effectiveness in regulating digital platforms. Less than 90% of households are covered by broadband or have a subscription to broadband internet, and Internet connection speed is at a medium risk level.

**Protection of freedom of expression** indicator scores a medium risk (40%). The country follows the freedom of expression international standards in the Constitution and media legislation. Insult (Article 147) and defamation (Article 149) in the Criminal Code (OG 56/15) are significant barriers to journalistic freedoms and freedom of expression in general. Defamation and insult charges continue to be the primary mechanisms for violating freedom of expression. As signatories to the Code of Practice on Disinformation, online platforms have been asked to provide information on various issues. Only a fraction of removals are done by following national legislation and government requests; other removals are not done transparently. There is no systematic evidence of the state's direct involvement in filtering, monitoring, blocking or removing online content. According to the Council Regulation (EU) 2022/350, the Croatian Regulatory Agency for Network Industries (HAKOM) blocked access to Russia Today and Sputnik on all platforms, including cable, satellite, IPTV, online platforms and apps.

**Protection of the right to information** scores a medium risk (50%). The right of access to information is

recognised in the Constitution and the Access to Information Act (OG 25/13). Complaints due to the administration's silence make up over half of the reported complaints. As in previous reporting periods, the administration's silence remained a fundamental problem in applying the Act. Access to information is mainly exercised through the direct involvement of the Information Commissioner (2022). A new Whistle-blowers Act was passed in late April 2022 (NN 46/22) with significant amendments to bring the national framework in line with the minimum standard required by the EU Directive (2019/1937). Acting as the competent authority for external reporting of irregularities, in 2021, Ombudswoman opened 92 new cases related to applying the Whistle-blowers Act (Ombudswoman, 2022). Considering the lack of court practice and the complexity of procedures concerning the new Act, the Ombudswoman recommended that the Judicial Academy conduct training for judges on applying the new Act, especially the provisions on judicial Protection of whistle-blowers, and for the Croatian Bar Association to train lawyers.

**Journalistic profession, standards, and protection** indicator score a high risk (68%). The Croatian Journalists' Association (HND) publicly promotes professional values of integrity, Independence, and plurality, and it cooperates actively with national and international NGOs, academic communities, and other professional associations. The Croatian Journalists' Association has a Journalistic Council of Honour, which monitors the behaviour of journalists according to its Code of Ethics. While it regularly issues warnings, breaches and severe breaches, these self-regulatory measures do not improve the overall editorial Independence in the country. According to a recent survey by the HND (2022a), 951 active lawsuits in March 2022 demanded retributions totalling 77.4 million Croatian Kuna (around 10 million EUR). Of them, 928 relate to defamation charges against publishers, editors or journalists. Some of these lawsuits were strategically raised in large numbers by individuals from public life, politicians and judges. One local county judge from Osijek won an award from the Coalition against SLAPPs in Europe (CASE) for being the biggest bully jurist in Europe in 2022. The Ministry of Culture and Media acknowledges the problem and has started organising educational workshops for members of the judicial system and the media. The many lawsuits strongly affect freelance and part-time journalists, often working for various non-profit media outlets. According to a recent study (December 2022) on a convenient sample (N = 135) of atypical workers and freelancers in Croatia conducted by the Trade Union of Croatian Journalists (SNH, 2022), most freelancers work on weekends. It is also common for media freelancers to accept work tasks outside of their specialisation (e.g., journalists also doing work as camera operators or montage editing) and take jobs outside of the media profession. Many freelancers are getting delayed payments for their work and are often not paid for it. More than half of the respondents do not take annual leave. A large share of media freelancers feels their intellectual property is not respected. Lawsuits and poor working conditions contribute to lower standards of the journalistic profession and freedom of expression.

**Independence and effectiveness of media authority** score a medium risk (38%). Budgetary resources are defined in law, which prevents political interference. Article 81 of the Electronic Media Act (OG 111/21) states that the financial resources for the functioning of the Agency are allocated by the annual financial plan of the Agency from 0.5% of the total yearly gross income from the previous year by electronic media operators. Members of the Electronic Media Council are appointed based on the Electronic Media Act (OG 111/21) and the Prevention of Conflict of Interest Act (OG 143/21). In practice, the appointment procedures of the Council members can be problematic as they are nominated and appointed by a simple majority in the Parliament, opening the space for direct political appointments by the parliamentary majority. Appointments are made based on informal political affiliation with the ruling party. The government conducts the selection process without transparency and only presents the final list to the parliament. In July 2022, the mandate for three Council members expired, and it was automatically extended for an additional six months since the new members were not elected. For a brief period in January 2023, the Council was

basing their decisions on the remaining four members, which meant that all had to vote in unison to reach a decision. In February 2023, two previous members were re-appointed, along with one additional member. The procedure was seen as a political blockade of the Council by the HND, SNH and the European Federation of Journalists (EJF). The new Electronic Media Act of 2021 defined platforms for exchanging audio-visual content (Article 95). However, Articles 98 and 99 do not mention platforms, making it unclear how the Council will exercise its regulatory power in compliance with the law. The media authority regularly publishes reports about its activities, including Council sessions, annual reports, strategic and financial plans, work programs, operation plans, and audit reports. There is, however, room for improvement, especially regarding the availability of data on the market structure for electronic media. Such data is not available publicly, and the Agency only provides limited information upon request. This problem is increasingly emphasised in the digital market, and the new Electronic Media Act from 2021 did not improve this situation.

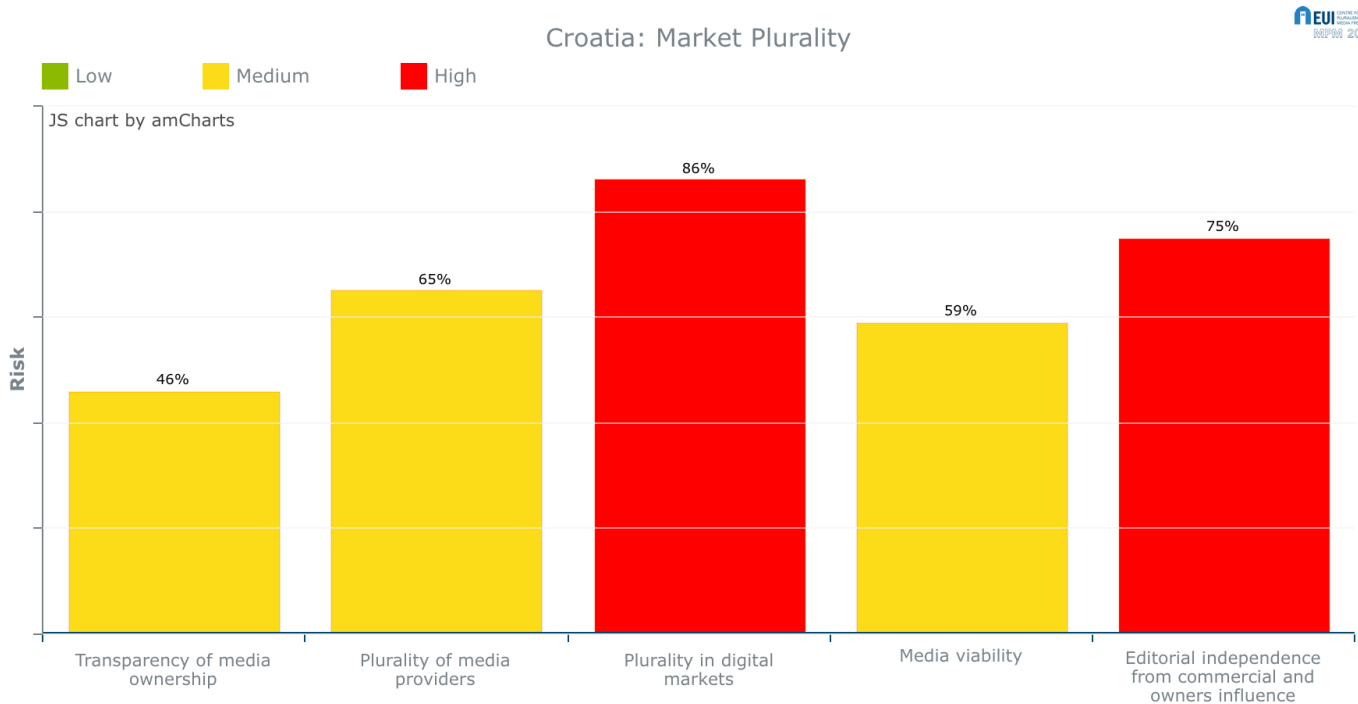
**Universal reach of traditional media and access to the internet** indicator scores a medium risk (33%). The contract between the public service media (PSM) and the government guarantees the universal coverage of the PSM. Most of the population is covered by the signal of all public television and radio channels (DVB-T2) and broadband internet. Regulatory safeguards for net neutrality are implemented in practice. Less than 90% of households are covered by broadband or have a subscription to broadband internet, and Internet connection speed is at a medium risk level.

### **Focus on the digital environment**

In March 2022, the Croatian daily Slobodna Dalmacija reported a cyber-attack targeting its website. According to the newspaper, several old articles were replaced with fake ones "promoting Russian propaganda about the war in Ukraine." The IT service detected the attack on time. Articles were removed, and the attack was reported to the police (ECPMF, 2023). Threats to journalists online, especially on social media, occur regularly. There are insults and misogyny directed at women. The Electronic Communications Act (OG 76/22) establishes data retention obligations in Article 53, which primarily relate to criminal investigations, national defence and security. Freedom of expression is mentioned in a very general manner as one of the core principles for the functioning of the regulatory agency (HAKOM) in Articles 7 and 8. The distinction between criminal offences and national security and defence cases should be more explicit and less ambiguous—article 53 leaves room for interpretations that might allow data retention for cases beyond national security and defence. The GDPR Implementation Act (42/18) contains no specific provisions concerning preventing law enforcement authorities' illegal monitoring of journalists. Internet broadband coverage and internet speed are at medium risk.

### 3.2. Market Plurality (66% - medium risk)

The Market Plurality area considers the economic dimension of media pluralism, assessing the risks deriving from insufficient transparency in media ownership, the concentration of the market in terms of both production and distribution, the sustainability of media content production, and the influence of commercial interests and ownership on editorial content. The actors included in the assessment are media content providers, with indicators including Transparency of media ownership, Plurality of media providers, Media viability, Editorial independence from commercial and ownership influence, and digital intermediaries (with the indicator on Plurality in digital markets).



The Market Plurality area scores a medium risk (66%), similar to the previous assessment period. There are only minor fluctuations in individual indicators. Inconsistent, non-transparent and non-existing data influence scores for this indicator, especially in cross-media ownership, electronic and (native) digital media revenue trends, employment statistics on journalists, and other areas. Generally, market regulation is not very transparent or practical, and the legally defined concentration thresholds are outdated.

**Transparency of media ownership** indicator scores a medium risk (46%). Print media report changes to the Croatian Chamber of Commerce, while electronic media (audio-visual, radio and digital media) report to the Council for Electronic Media. Citizens can easily access the registers of all relevant media. Article 61 of the Electronic Media Act (OG 111/21) requires all electronic media to report changes within five days. It is prohibited to conceal the ownership structure of a media service provider or the ownership of the acquirer of shares or business stakes in a media service provider by any legal means. The registers contain an extract of the ultimate beneficial owners. However, in practice, ultimate owners can stay hidden behind business entities, mainly in foreign-owned TV channels. Article 32, paragraph 2 of the Media Act (OG 54/04) states that all publishers must disclose whether the stock or shares are owned individually or for others. The amended Media Act (OG 84/11) added a paragraph to Article 32 stating that any cover-up of the ownership structure by other legal means is forbidden.

**Plurality of media providers** indicator scores a medium risk (65%). Generally, monitoring can be described as relatively passive and only acts if the audio-visual media duly report ownership changes. Rules regulating the concentration of digital news media (i.e. electronic publications) are still unclear. No horizontal

concentration provisions exist for electronic publications, and there is limited monitoring of cross-media ownership changes in the digital economy. In 2021, the country's top 4 audio-visual media owners accounted for 97% of the market. The data relates to television providers and the share of their income in the television services market<sup>[1]</sup> The audience concentration of the country's top 4 television channels in 2022 was 55%.<sup>[2]</sup> The market share of the top 4 radio owners was 69 per cent in 2020. Data relates to radio providers and the share of their income in the radio service market.<sup>[3]</sup> The audience concentration of the top 4 radio owners in 2022 was 38 per cent.<sup>[4]</sup> No new data for newspaper owners regarding market shares from the Croatian Chamber of Commerce was received. The top 4 newspapers in the country accounted for 17 per cent of the readership.<sup>[5]</sup> The market share of the top 4 online news media (electronic publications) was 53 per cent.<sup>[6]</sup> The audience share of the top 4 online news media was 86 per cent.<sup>[7]</sup>

**Plurality in digital markets** scores a high risk (86%). Competition rules that consider the plurality in digital markets do not exist and are undeveloped. In principle, the high degree of concentration in the digital market can be prevented by enforcing competition rules. However, no advertising laws or regulatory bodies are monitoring concentration in the advertising market, apart from the Market Competition Protection Agency. The country has not introduced or scheduled any form of taxation of digital services. Directive 2019/790 was transposed in October 2021 in the Copyright Act (OG 111/21). However, there are no financial agreements between digital intermediaries and news media providers, nor is there an initiative or discussion to kick-start this process.

**Media viability** indicator scores a medium risk (59%). Reliable data for this indicator in Croatia is difficult and, sometimes, impossible to obtain since no regulatory bodies or professional associations collect it. Revenues for the audio-visual and radio sector have been stationary.<sup>[8]</sup> In 2021, the sold circulation of all general information dailies in the Republic of Croatia decreased by 13 and information weeklies by 5 per cent compared to 2020. Advertising revenue, on the other hand, saw an increase (AZTN, 2022). No official statistics or monitoring mechanisms specify the difference between native news, online traditional news media and online platforms. The revenue data for native news and online traditional news media is compiled under the Electronic publications revenue category by the regulatory agency. The advertising industry monitors overall investments in the media without differentiating between news media and other media. Total advertising spending has grown by 5 per cent between 2022 and 2021 (HURA, 2023). According to a study conducted by the Croatian Association for Journalist Copyright Protection (DZNAP) in 2022, there are around 10000 subscribers to major digital news outlets. Subscriptions usually offer more detailed analyses, investigative and opinion pieces and more quality journalism. The trend is still relatively weak, especially compared to the EU, where Croatia ranks at the bottom in terms of subscriptions to news content. There are no official data sources on the number of journalists in Croatia. The HND has numbers on members of the association, and the SNH on the number of trade union members. These numbers do not represent all employed journalists since many are not members of the journalists' association or the trade union.

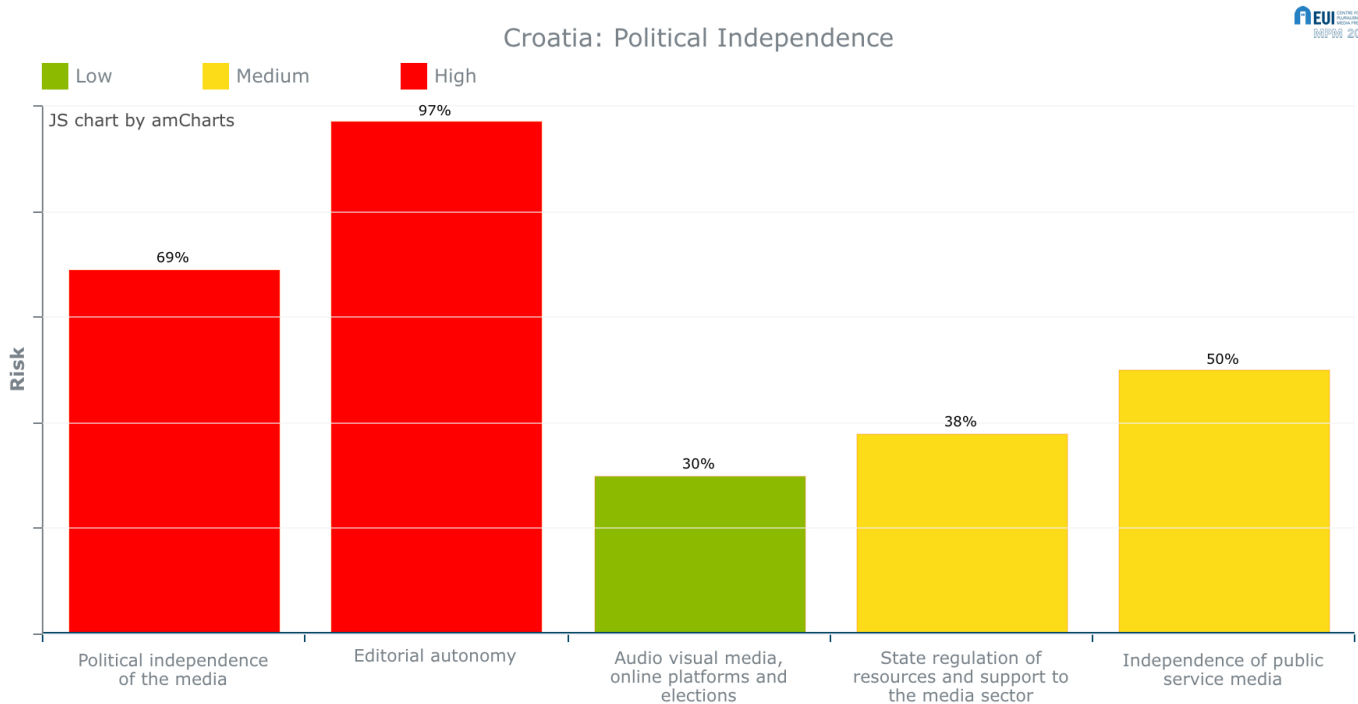
**Editorial independence from commercial and owner influence** scores a high risk (75%). Media statutes as self-regulatory acts (Article 26 of the Media Act (OG 59/04)) are created to determine the participation of journalists in cases of appointing and resolving chief editors, working conditions, journalistic responsibility, procedures in cases when chief editors and the editorial board have a right to resign in cases of ownership or management structure changes which bring into question program schemes and content (so-called consciousness clause). However, they are highly inefficient in protecting journalists from commercial interests. In a sample of 141 journalists and editors of daily newspapers, electronic and online media Croatian journalists mention advertisers first, followed by competing media companies and national and local politicians as the main external influences on their profession (Ivanuš, 2021).

## Focus on the digital environment

There are no horizontal concentration rules (capital shares) for electronic publications (i.e. digital news media) in Article 64, and regulations are much looser for the digital environment. A dominant market position restriction (40%) in Article 65 of the Electronic Media Act (OG 111/21) related to electronic publications exists. The market share of top online news media in 2021 was 54 per cent.<sup>[9]</sup> The audience share for the top 4 online news media in 2022 was 86 per cent.<sup>[10]</sup> Apart from the Market Competition Protection Agency, no administrative body is responsible for collecting and monitoring the online advertising sector. There are clear indicators that transnational digital platforms dominate internet advertising with potentially harmful effects on digital news media viability (Bilić and Primorac, 2018). News publishers are unable to monetise their audience reach, given the dominant position of platforms such as Facebook and Google. There is no legal definition of online platforms apart from platforms for distributing audio-visual content in line with the transposed AVMS Directive. There are no financial agreements between digital intermediaries and news media providers, nor is there an initiative or discussion to kick-start this process. Digital taxation is rarely debated at the academic or policy level.

### 3.3. Political Independence (57% - medium risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



The Political Independence area scores a medium risk of 57%, a decrease from 2021. The Editorial autonomy and the Political independence of the media indicators remain at high risk. The Audio-visual media, online platforms and elections and the State regulation of resources and support to the media sector remain low and medium-risk indicators, respectively. The Independence of public service media decreased from high to medium risk, resulting from changes in the methodology and not in the actual situation in practice.

**Political independence of the media** scores a high risk (69%). The Prevention of Conflict of Interests Act (OG 143/21) serves as the primary legal framework for regulating media ownership restrictions for politicians in Croatia. Specifically, Article 19 of the Act prohibits any engagement of public officials that would create a conflict of interest. It stipulates that any public official holding more than 5% of shares in a company must transfer their rights to another person or a particular body while in office. The Electronic Media Act (OG 153/09, 111/21) also plays a role in this regulation by determining limitations for so-called "connected persons" in Article 64. However, it does not include politicians in its definition of "connected persons". Additionally, the Law on the Prevention of Money Laundering and Terrorist Financing (OG 108/17, 39/19, 151/22) was amended in 2019 through Articles 32-36 to establish a Registry of Beneficial Owners of commercial entities. Local television, radio stations and newspapers are economically struggling and significantly more susceptible to covert political influence on editorial policy. There have been no significant reports or indications of overt political pressure on HINA in recent years. However, while there are some legal safeguards when it comes to appointments to HINA bodies, more could be done to ensure the political independence of their members - parliamentary appointments of the Management Board majority can act as



an effective political bottleneck for potential candidates.

**Editorial autonomy** indicator scores a high risk (97%). The Media Act (OG 59/04, 84/11, 81/13) and the Electronic Media Act (OG 153/09, 84/11, 94/13, 136/13, 111/21) do not contain explicit provisions that prevent political influence or ensure media autonomy in the appointment and dismissal of editors-in-chief. While Article 24 of the Media Act stipulates that publishers must obtain the editorial board's opinion before making such appointments or dismissals, no explicit language aims to reduce political influence or guarantee editorial autonomy. The legislative control and prevention of political power on appointments and dismissals of editors have been largely absent. The trend has become particularly pronounced in the case of the public service broadcaster, where layoffs and reappointments have occurred with increasing frequency. It is difficult to assess the prevalence of self-regulatory measures within the Croatian media landscape, as most of them are not publicly disclosed. Most editors tend to tow the management line instead of standing up for professional standards. (Klancir, 2021)

**Audio-visual media, online platforms, and elections** indicator score a low risk (30%). Access to airtime is regulated through the Rules for Electronic Media with a National Concession in the Republic of Croatia. During each election cycle, the PSM aligns its editorial policy through self-regulation and the Programming Rules for Following Election Campaigns. These rules have been effectively implemented in recent years, as there have been no reported concerns regarding access during past election campaigns. The rules state that entry shall be available to all political candidates during a given election cycle. However, it should be noted that the rules may not be as accommodating for smaller political parties or new political options. The relatively new Rules on the Manner of Keeping Records, Issuing Certificates and Entering Reports on the Financing of Political Activities, Election Campaigns and Referendums in the Information System for the Supervision of Financing (OG 71/2019) mandate that costs associated with social media campaigns be reported separately from traditional media advertising costs. This requirement is reflected in political candidates' electoral campaign expense reports, which must include a separate line item for social media costs. Not all candidates/parties are equally meticulous in filling out forms and submitting accurate data. It is possible to fill out the form with lump sum costs for all social media advertising paid directly by the party (so no individual social network payment data is available across all candidates), and often social media costs that a PR agency representing a specific party pays from their lump sum budget is not reported at all.

**State regulation of resources and support to the media sector** score a medium risk (38%). There are relatively few regular direct subsidies provided to media outlets in Croatia. The Council for Electronic Media is responsible for administering the Fund for the Promotion of Pluralism and Diversity, established under the Electronic Media Act (OG 111/21). The Fund is financed by allocating 3% of the PSM license fee, per the Croatian Radio-television Act (OG 137/10). The implementation and effectiveness of the Fund are monitored by a designated body which is constrained by some methodological limitations. For example, the focus is primarily on administrative compliance (such as ensuring that the number of radio shows promised in a proposal is produced) rather than evaluating the extent to which the content of the shows contributes to pluralism and diversity in the media landscape. The Value Added Tax Act (OG 73/13; 148/13; 143/14) established a reduced rate of 5% for the value-added tax (VAT) for daily newspapers that possess a self-regulatory act or media statute and publish a minimum of 25,000 words of journalistic content in their day-to-day issues, except publications that contain a significant proportion of advertisements. This reduced rate contrasts with the standard VAT rate of 25%. The distribution of the VAT subsidy to media outlets is conducted without discrimination. However, there are no systematic mechanisms in place, such as a regulatory body with the authority to enforce criteria to ensure compliance with the requirements for the subsidy. The VAT-decreasing regulations only prescribe specific minimal standards, and even those are

unenforceable. For instance, it is relatively easy for publishers to administratively fulfil the subsidy criteria by formally adopting a pro forma newsroom media statute in the print media sector without the statute's real purpose. Article 38 of the Electronic Media Act (OG 111/21) stipulates that state bodies and legal entities owned by the Republic of Croatia are obligated to allocate 15% of their annual budget for the promotion of their services or activities towards advertising in regional and local audio-visual or radio programs of television and radio broadcasters, and electronic media. However, no explicit guidelines exist for distributing state advertising to media outlets. State administration bodies and legal entities fulfil their legal obligations by submitting information to the Electronic Media Council about the advertising placed by March 31st of each calendar year. Many state-owned companies do not disclose information about the amounts allocated for specific media as they consider it classified information (Paparella, Ivković Novokmet, Skender, 2022). State advertising is often channelled through marketing agencies, typically appointed at the discretion of political leaders or managers, without any public tenders.

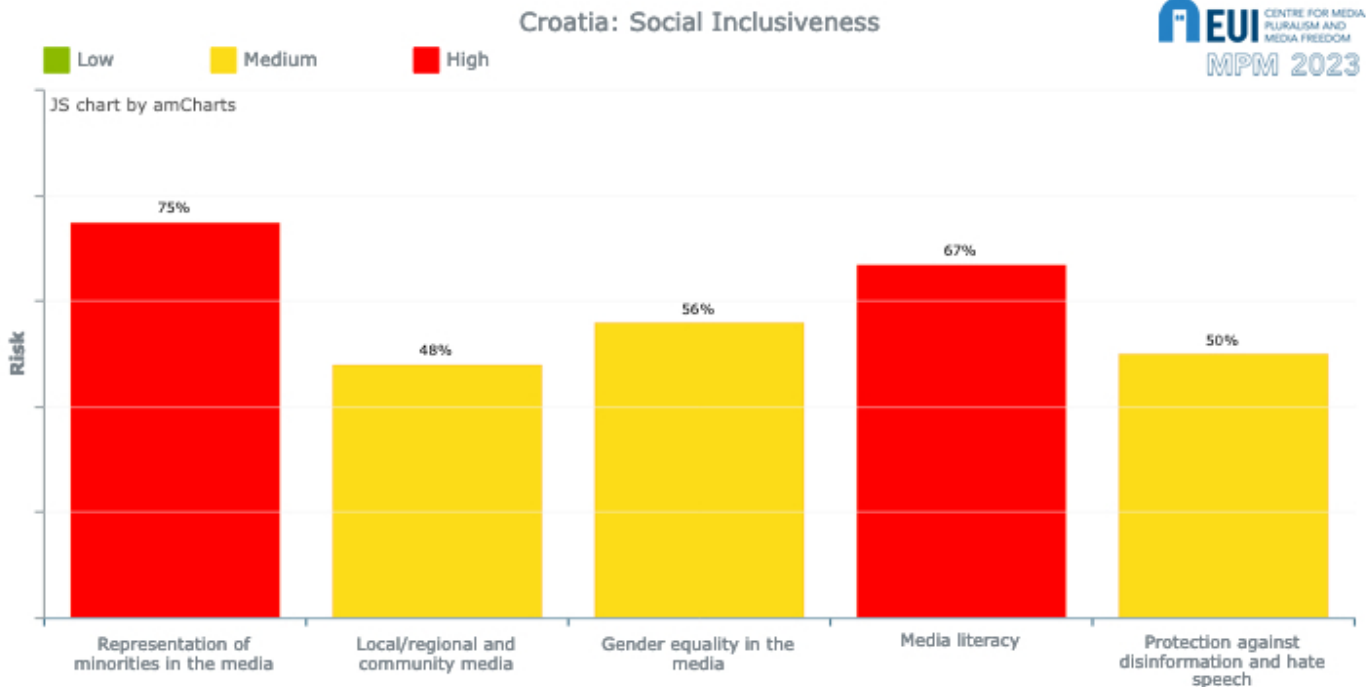
**Independence of public service media** scores a medium risk (50%). The score reflects a high risk of politicisation over the PSM management and editorial line and a low risk of PSM funding. The license fee provides the PSM with stable funding removed from political interference. The amendments to the HRT Act in 2012 provide for the election of a Director-General of the HRT with a majority vote of Parliament, which also elects 9 out of 11 members of the HRT Programme Council and 4 out of 5 members of the HRT Supervisory Board. A worrying track record has been established - with the change in Government, the management of the HRT changes as well, appointing new editors ideologically in line with new government policies. The contract between the Government and the HRT (2023-2027) was approved after a contentious public reception of its draft - the Trade Union of Croatian Journalists (SNH, 2022) published a statement claiming the legally necessary public consultation process was held pro forma, and that the proposed contract was a step back in PSM's duty to act in the public interest.

### **Focus on the digital environment**

The ownership structure of the right-wing digital news media is generally less transparent- ultimate beneficial owners can be hidden and represented by other legal entities. That practice appears most prevalent with news portals with extreme political rhetoric. The Council for Electronic Media (VEM) deleted six publishers from the register for not adhering to the provisions of the Electronic Media Act. Despite the deletions, three are active and publish new content daily (Sloboda, Max Portal, and Zadar Danas). The Rules on the Manner of Keeping Records, Issuing Certificates and Entering Reports on the Financing of Political Activities, Election Campaigns and Referendums in the Information System for the Supervision of Financing (OG 71/2019) should be more specific. The State Electoral Commission does not consider social media platforms as media, per the media definition outlined in the Media Act. This is reflected in the requirement for social media posts to be reported separately from traditional media advertising costs.

### 3.4. Social Inclusiveness (59% - medium risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against disinformation and hate speech.



The Social Inclusiveness area scores a medium risk of 59%, a slight decrease from the 62% assessment for 2021. The Representation of minorities in the media increased from medium to high risk, and Gender Equality in the media decreased from high to medium risk. Other indicators remain within the same risk assessment with minor or no fluctuations.

**Representation of minorities in the media** scores a high risk (75%). The Republic of Croatia ensures the exercise of the special rights and freedoms of the members of national minorities, which they enjoy individually or jointly with other members of the same national minority. The right to access the media and public information services (receiving and disseminating information) in minority language and script is one of the legally guaranteed minority rights. However, neither the Constitutional Act on the Rights of National Minorities nor the Croatian Radio-Television Act (OG 137/10, 76/12, 78/16, 46/17, 73/17, 94/18, 114/22) does not foresee that minorities transmit their content in programmes on PSM channels. In practice, most minorities do not have access to airtime, or it is not proportional to the size of their populations in the country. The Contract between the Government and the HRT (2023-2027) obliges broadcasts in the languages of national minorities (Pula and Rijeka, in Italian, Osijek in Hungarian and Slovak), with specialised musical content. Knin and Dubrovnik's regional programming channels will broadcast programs for the Serbian and Bosnian national minorities in Croatian. It is generally held by media and minority experts, as well as minority practitioners, that the number of local radio and television programmes in the minority languages in the programming of the public broadcaster HRT is insufficient. Minorities not recognised by law have no systematic or legally guaranteed access to the media. Croatia has still not implemented the EU Directive 2019/882 on accessibility requirements for products and services for people with disabilities. Exceptionally, the Electronic Communications Act (OG 76/2022) is harmonised with the Directive, which is only one of a large number of products and services to which the Directive applies

following Article 2 of the Directive and has only been implemented since the adoption of the law in July 2022.

**Local/regional and community media** scores a medium risk (48%). The Electronic Media Act does not clearly define local and regional media. However, the Council for Electronic Media grants concessions to local and regional communities based on Article 77 of the Electronic Media Act (OG 11/21) in cooperation with the Croatian Regulatory Agency for Network Industries, Electronic Communications Act (Article 16, OG 76/22), and the Concessions Act (Article 8, OG 69/17, 107/20) and supports them through the Fund for the Promotion of Pluralism and Diversity. Local and regional media often serve as instruments for managing and centralising public opinion at the local/regional level and ensuring voting power in the local and general elections. Local media are also dependent on subsidies from the local and municipal levels. These funding agreements are usually funded through non-transparent “advertising” transactions, severely damaging their independence and turning them into local politicians and people in business's mouthpieces. While there is no clear definition of community media in Croatian law, the closest description to international standards (Council of Europe, 2007; European Parliament, 2007; UNESCO, 2017) is non-profit media. Article 55 of the Electronic Media Act (OG 111/21) defines non-profit media service providers, electronic publications as well as non-profit producers of audio-visual and radio programs. Non-profit producers of audio-visual and radio programs can be institutions, councils, minority associations, educational institutions, health institutions and other institutions, religious communities, student associations, school associations, citizen associations and other legally defined non-governmental associations and non-profit societies dedicated to satisfying informative, educational, scientific, expert, artistic, cultural, religious, and different needs of the public. The state supports community media with a limited number of subsidies. The community media are financed mainly by the Fund for Promotion of Pluralism and Diversity. This Fund is supported by 3% of the license fee collected by the public service broadcaster. However, only 8 per of the Fund is guaranteed to be distributed to non-profit media.

**Gender equality in the media** scores a medium risk (56%), a decrease from a high risk of 80% in 2021. The decrease results from a better gender balance in key management positions in the media. The Contract between the Government and the HRT (2023-2027) contains some provisions on mission values (Article 9) and programming (Article 51). However, no comprehensive policy on gender equality exists. Women are underrepresented at the Programme Council of the HRT. The HRT Directorate has five members; three are women. Women are equally represented in management boards and among executives of private TV companies as well as among editors-in-chief in the leading news media. The latest report by the Ombudsperson for Gender Equality (2022) shows persistent trends of adverse media reports regarding gender-based violence, sexism and objectification of women in news and advertising, and gender stereotypes in satirical and artistic expressions. Regarding gender disbalance in commenting on public issues, the Ombudsperson reports on sexism, sexist connotations, gender stereotypes and degrading of women in statements by public individuals. There is a rise in sexist speech on the personal social media profiles of public individuals. The media report about women in politics emphasises how they dress, generating public debate about physical appearance and fashion choices.

**Media literacy** indicator scores 67%. Although media literacy is mentioned in some strategic documents, such as the Education, Science and Technology Strategy (OG 124/14), the Electronic Media Act (OG 111/21) and the Croatian Radio Television Act (OG 137/10, 76/12, 78/16, 46/17, 73/17, 94/18, 114/22), in Croatia, there is no clear media education policy. The training programme in teachers' media literacy is limited as only a small number of teachers are exposed to training in media literacy. The subject of media literacy is present in non-formal education but only to a limited extent. Civil society associations carry out

most activities in the field of media education in Croatia. Although they exist in all Croatian regions, most gravitate around the City of Zagreb. Most of their actions are aimed at children, although research shows that such activities are necessary for the elderly as well.

**Protection against disinformation and hate speech** scores a medium risk (50%). One of the goals of The National Plan for Recovery and Resilience (2021-2026) is to establish media fact-checking and a system of transparent public data, with the Ministry of Culture and Media and the Agency for Electronic Media being the responsible institutions for the realisation of this goal. While there is some momentum and a clearly defined pathway for tackling disinformation, the impact of these measures and future projects remains to be determined. Two fact-checking organisations operate in Croatia: Faktograf and AFP. Both are signatories to the principal activities of IFCN and are included in Facebook's Third-Party Fact-Checking Program project. Only 49% of the population trusts the media (Eurobarometer, 2021). Disinformation was a significant source of mobilisation for anti-vaccination and anti-mask protests and rallies that occurred several times during 2021 and 2022. While the new Electronic Media Act (OG 111/21) defined editorial responsibility for comments under news items on digital news websites, those same articles shared over social media channels do not fall within the scope of hate speech regulation. Hence, the legal intervention left a legal gap and a large portion of public space unaddressed by hate speech regulation. The Criminal Code (OG 125/11, 144/12, 56/15, 61/15, 101/17, 118/18, 126/19, 84/21, 114/22) addresses hate speech in online networks in Article 325. However, implementing the Code is not within the purview of the media authority, which reduces the effectiveness of hate speech regulation.

### **Focus on the digital environment**

The Agency for Electronic Media commissioned a study published in late 2022 titled "Strengthening social resilience on information: analysis and guidelines" (Grbeša Zenzerović et al., 2022). It served as the basis for the document "Standards and criteria for Public implementation call for grants". In 2023, new projects will be implemented, developing different technical systems and computing methods for tackling disinformation. In addition, the Adria Digital Media Observatory, funded by the Digital Europe Programme (HaDEA), was founded at the University of Dubrovnik in collaboration with universities and civil society organisations. Once these projects gain traction, the expected impact of the initiatives for tackling disinformation will be much clearer to estimate. There are different ways to report online hate speech. First, directly reporting to the Police and the Ministry of Internal Affairs on the "Security and Trust" application. Second, to the "Stop Hate" website. The site was created in cooperation with the Centre for Peace Studies, GONG and the House of Human Rights Zagreb as a response to the frequent presence of hate speech that harms social cohesion, the values of pluralism, interculturality and tolerance towards others and those who are different. The page was created as part of the "Against Hate" project and was upgraded through the "Facts against Hate" project, both of which were financed by the Program on Rights, Equality and Citizenship of the European Union (2014-2020). Both projects were realised in cooperation with the Ministry of Justice of Finland.

## 4. Conclusions

Croatia scores a medium risk in all four areas: Fundamental Protection (47%), Market Plurality (66%), Political Independence (57%), and Social Inclusiveness (59%). The results show a slight increase in risk for the Fundamental Protection area and a slight decrease for the Political Independence and Social Inclusiveness areas.

### Fundamental Protection:

- Defamation charges should be decriminalised, and the Criminal Code (OG 125/11; 144/12 61/15; 101/17; 118/18; 126/19; 84/21) amended.
- Journalistic work conditions should be improved, especially regarding social security and healthcare options for freelance workers.

### Market Plurality:

- The Council for Electronic Media and the Croatian Chamber of Commerce need to improve their data collection strategies to allow a better understanding and regulation of the digital economy, especially in the cross-media concentration area. There is no separate monitoring of revenues of online platforms, native news media and digital outlets of traditional media.
- No official data on the number of employed and unemployed journalists in the country hampers effective regulation and monitoring of media viability and journalistic rights in the system.

### Political Independence:

- A mechanism for monitoring the effectiveness of media statutes should be implemented.
- The Croatian Radio-television Act (OG 137/10; 76/12; 78/16; 46/17; 73/17; 94/18) should be amended to change appointment procedures for management positions. Director General and the Management Committee should be approved in the Parliament through a two-thirds majority.
- A more effective reporting system should be developed to ensure that state advertising to media outlets can be tracked and examined.

### Social Inclusiveness:

- Directive, 2019/882 on accessibility requirements for products and services for people with disabilities must be effectively implemented.
- A national strategy for developing media literacy should be created, strengthening formal and lifelong education in media and citizenship.
- A clear definition of community media in line with international standards should be created (Council of Europe, 2007; European Parliament, 2007; UNESCO, 2017), and the available subsidies from the Fund for the Promotion of Pluralism and Diversity for non-profit media increased to ensure more internal

pluralism in the media system as a whole.

## 5. Notes

- [1] Data were provided on request by the Agency for Electronic Media.
- [2] Data were provided on request by the Nielsen agency's SHR measure.
- [3] Data were provided on request by the Agency for Electronic Media.
- [4] Data were provided on request by Ipsos based on daily reach among all radio stations (January – December 2022).
- [5] Data were provided on request by Ipsos based on Average Issue Readership (AIR) among 60 newspapers (January – December 2022).
- [6] Data were provided on request by the Agency for Electronic Media.
- [7] Data were provided on request by Ipsos based on the average monthly share of unique visitors (January – December 2022).
- [8] Data were provided on request by the Agency for Electronic Media for 2021. Compared with WARC forecasts for 2022.
- [9] Data provided upon request by the Agency for Electronic Media.
- [10] Data provided on request by Ipsos based on the average monthly share of unique visitors (January – December 2022).

## 6. References

- AZTN (2022) *Na tržištu tiska i u 2021. prisutan višegodišnji izražen trend pada prodanih naklada, ali raste prihod od oglašavanja u dnevnicima i tjednicima*. Available at <https://www.aztn.hr/na-trzistu-tiska-i-u-2021-prisutan-visegodisnji-izrazen-trend-pada-prodanih-naklada-ali-raste-prihod-od-oglasavanja-u-dnevniciima-i-tjednicima/> (date accessed 6 March 2023)
- Bilić, P. and Primorac, J. (2018) The digital advertising gap and the online news industry in Croatia. *Medijske studije* 9(18): 62-80. <https://hrcak.srce.hr/clanak/318538>
- Council of Europe (2009) *Declaration of the Committee of Ministers on the role of community media in promoting social cohesion and intercultural dialogue*. Available at [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805d1bd1](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d1bd1) (date accessed 6 March 2023)
- Council of Europe (2007) *Recommendation CM/Rec(2007)2 of the Committee of Ministers to member states on media pluralism and diversity of media content*. Available at: [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805d6be3](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d6be3) (date accessed 6 March 2023)
- Croatian Bureau of Statistics (2022a) *Broj zaposlenih u rujnu 2022. porastao za 1,3% u odnosu na isti mjesec prošle godine*. Available at <https://dzs.gov.hr/vijesti/broj-zaposlenih-u-rujnu-2022-porastao-za-1-3-u-odnosu-na-isti-mjesec-prosle-godine/1303> (date accessed 6 March 2023)
- Croatian Bureau of Statistics (2022b) *Popis '21*. Available at <https://dzs.gov.hr/vijesti/objavljeni-konacni-rezultati-popisa-2021/1270> (date accessed 6 March 2023).
- Croatian Bureau of Statistics (2023a) *Kalkulator inflacije*. Available at <https://web.dzs.hr/calcinfl.htm> (date accessed 6 March 2023).
- Croatian Bureau of Statistics (2023b) *U četvrtom tromjesečju 2022. BDP realno veći za 4,0% u odnosu na isto tromjesečje 2021*. Available at <https://dzs.gov.hr/vijesti/u-cetvrtom-tromjesecju-2022-bdp-realno-veci-za-4-0-u-odnosu-na-isto-tromjesecje-2021/1443> (date accessed 6 March 2023).
- Croatian Parliament (2021) *Nacionalna razvojna strategija Republike Hrvatsko do 2030. godine [2030 national development strategy of the Republic of Croatia]*. Official Gazette 13. Available at [https://narodne-novine.nn.hr/clanci/sluzbeni/2021\\_02\\_13\\_230.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2021_02_13_230.html) (date accessed 22 March 2022)
- DZNAP (2022) *Čitatelji su spremni platiti – istraživačko novinarstvo, a Hrvatska je zadnja u EU po udjelu sadržaja za koji se plaća*. Available at <https://dznep.hr/citatelji-su-spremni-platiti-istrazivacko-novinarstvo-a-hrvatska-je-zadnja-u-eu-po-udjelu-sadrzaja-za-koji-se-placa/> (date accessed 6 March 2023)
- ECPMF (2023) *Croatia: Mapping Media Freedom*. Available at <https://www.mappingmediafreedom.org/country-profiles/croatia/> (date accessed 22 March 2022)
- Eurobarometer (2021) *Trust in the media*. Available at <https://rm.coe.int/ebu-mis-trust-in-media-2021/1680a83792> (date accessed 22 March 2022)
- European Parliament (2008) *European Parliament resolution of 25 September 2008 on Community Media in Europe*. Available at [https://www.europarl.europa.eu/doceo/document/TA-6-2008-0456\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-6-2008-0456_EN.html) (date accessed 6 March 2023)
- Government of the Republic of Croatia (2021) *Plan oporavka i otpornosti 2021. – 2026. [Recovery and Resilience Plan 2021-2026]*. Available at <https://planoporavka.gov.hr/UserDocsImages/dokumenti/Plan%20oporavka%20i%20otpornosti%2C%20srpanj%202021..pdf?vel=13435491> (date accessed 22 March 2022).
- Government of the Republic of Croatia (2023) *National Minorities in the Republic of Croatia*. Available at <https://pravamanjina.gov.hr/nacionalne-manjine/nacionalne-manjine-u-republici-hrvatskoj/352> (date accessed 6 March 2023).
- Grbeša-Zenzerović, M., Nenadić, I., Gjurković, M. and Karan, M. (2022) *Jačanje otpornosti društva na dezinformacije: analiza stanja i smjernice za djelovanje*. Available



at <https://www.aem.hr/blog/2022/09/12/agencija-za-elektronicke-medije-objavila-je-drugo-izdanje-studije-jacanje-otpornosti-drustva-na-dezinformacije-analiza-stanja-i-smjernice-za-djelovanje/> (date accessed 22 March 2022).

HND (2022a) *ISTRAŽIVANJE HND-A: BROJ TUŽBI PROTIV NOVINARA I MEDIJA U PORASTU, AKTIVNO NJIH NAJMANJE 951*. Available at <https://www.hnd.hr/istrazivanje-hnd-a-broj-tuzbi-protiv-novinar-a-i-medija-u-porastu-aktivno-njih-najmanje-951> (date accessed 6 March 2023)

HND (2022b) *Sudac Zvonko Vrban proglašen najvećim pravosudnim zlostavljačem u Europi*. Available at <https://www.hnd.hr/sudac-zvonko-vrban-proglasen-najvecim-pravosudnim-zlostavljacem-u-europi> (date accessed 6 March 2023)

HURA (2023) *HURA Media AdEx (Advertising Expenditure)*. Available at <https://hura.hr/istrazivanja/medijska-potrosnja-u-hr/> (date accessed 6 March 2023).

Information Commissioner (2022). *Report on Implementing the Access to Information Act in 2021*. Available at: <https://pristupinfo.hr/dokumenti-i-publikacije/izvjesca-o-provedbi-zppi/> (accessed on 6 March 2023)

Ivanuš, Ž. (2021). *Novinarska etičnost pod pritiskom interesnih skupina—Iskustva hrvatskih novinara. Media, Culture and Public Relations*, 12(1), 73–90

Klancir, Đ. (2021) *Tko sve pritišće novinare i novinarkе: od političara do oglašivača*. Available at <https://gong.hr/2021/12/15/tko-sve-pritisce-novinare-i-novinarke-od-politicara-do-oglasivaca/> (date accessed 6 March 2023)

Ombudsperson for Gender Equality (2022) *Izveštaj o radu za 2021*. Available at <https://www.prs.hr/cms/post/675> (date accessed 6 March 2023).

Ombudswoman of the Republic of Croatia (2022). *Report on Implementing the Access to Information Act in 2021*. Available at: <https://www.ombudsman.hr/hr/zastita-prijavitelja-nepravilnosti-3/> (accessed on 6 March 2023)

Paparella, S., Ivković Novokmet, O. i Skender, M. (2022) *Državno financiranje bez jasnih kriterija*. Available at <https://gong.hr/wp-content/uploads/2022/10/Drzavno-financiranje-bez-jasnih-kriterija-Alat-za-cenzuriranje-medija.pdf> (accessed on 6 March 2023)

Perišin, T. (2021) *Percepcija javnosti o medijima i medijskom sadržaju*. Available at <https://hrzz.hr/percepcija-javnosti-o-medijima-i-medijskom-sadrzaju/> (date accessed 6 March 2023)

SNH (2022) *O Ugovoru HRT-a i Vlade RH ili javna rasprava koja to nije, Ugovor koji to nije*. Available at <https://www.snh.hr/o-ugovoru-hrt-a-i-vlade-rh-ili-javna-rasprava-koja-to-nije-ugovor-koji-to-nije/> (date accessed 6 March 2023)

SNH (2022) *Status of atypical workers and freelancers in Croatian media*. Available at <http://www.snh.hr/wp-content/uploads/2022/12/Media-Freelancers-Report-on-working-conditions.pdf> (date accessed 6 March 2023)

## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Pasko</i>	<i>Bilic</i>	<i>Senior Research Associate</i>	<i>Institute for Development and International Relations</i>	X
<i>Monika</i>	<i>Valecic</i>	<i>Odgovorna za područje političke nezavisnosti</i>	<i>Independent researcher</i>	

## ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
<i>Hrvoje</i>	<i>Zovko</i>	<i>Predsjednik</i>	<i>Hrvatsko novinarsko društvo</i>
<i>Viktorija</i>	<i>Car</i>	<i>Redovita profesorica</i>	<i>Fakultet političkih znanosti Sveučilišta u Zagrebu</i>
<i>Bojana</i>	<i>Božanić Ivanović</i>	<i>Predsjednica</i>	<i>Hrvatska udruga poslodavaca - Udruga novinskih izdavača</i>

**Research Project Report**

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