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Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2017 in the European Union, FYROM, Serbia & Turkey

Country Report: Croatia

Authors: Paško Bilić, Antonija Petričušić, Ružica Eterović

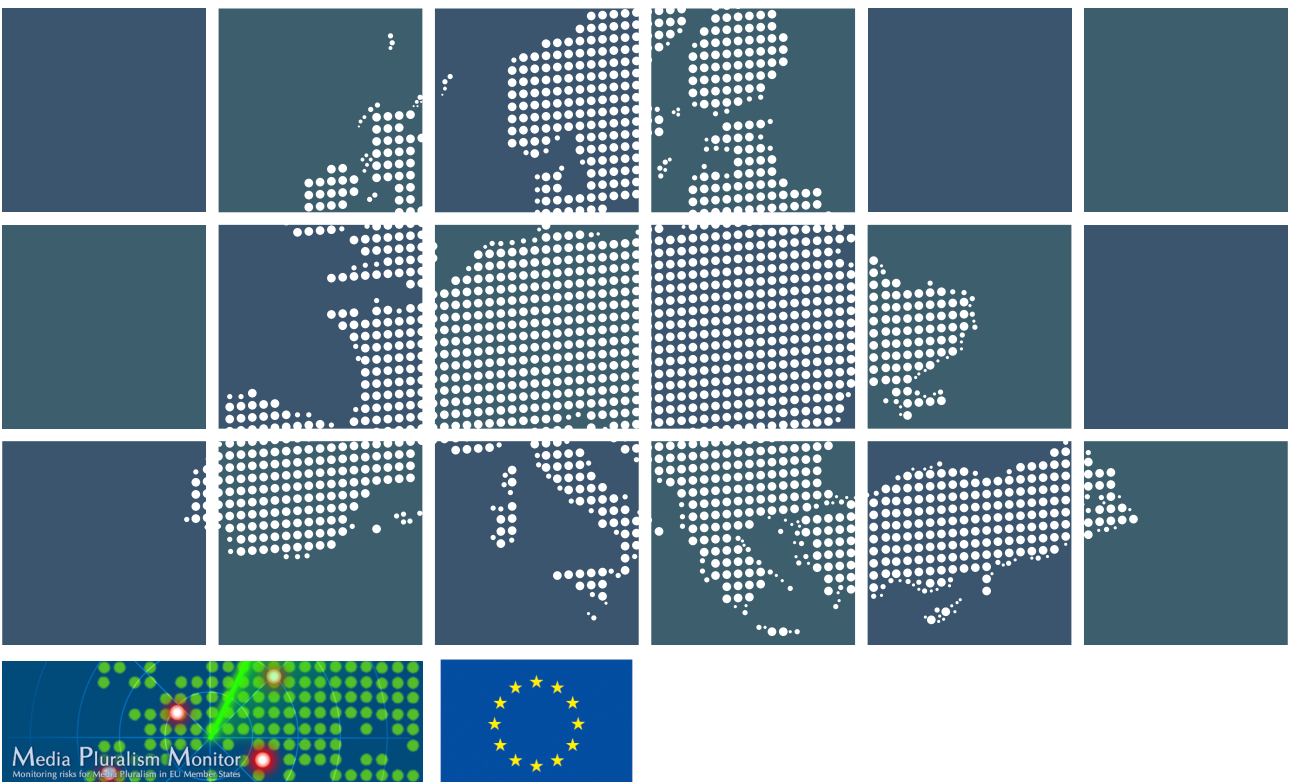




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1. ABOUT THE PROJECT

1.1 OVERVIEW OF THE PROJECT

The Media Pluralism Monitor (MPM) is a research tool that was designed to identify potential risks to media pluralism in the Member States of the European Union. This narrative report has been produced within the framework of the second EU-wide implementation of the MPM, carried out in 2017. The implementation was conducted in 28 EU Member States, Serbia, Former Yugoslav Republic of Macedonia (FYRoM) and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2 METHODOLOGICAL NOTE

The CMPF cooperated with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the cases of Malta and Italy where data collection was carried out centrally by the CMPF team. The research is based on a standardised questionnaire and apposite guidelines that were developed by the CMPF. The data collection was carried out between June and December 2017.

In Croatia, the CMPF partnered with Paško Bilić (Institute for Development and International Relations), who conducted the data collection and annotated the variables in the questionnaire and interviewed relevant experts. The scores assessing the risks for media pluralism were provided by the CMPF and calculated according to the algorithm developed by the Centre itself. The national report was reviewed by 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 Annexe II for the list of experts).

To gather the voices of multiple stakeholders, the Croatian team organized a stakeholder meeting, on 9 April 2018 in Zagreb. Summary of this meeting and more detailed explanations are given in the Annexe III.

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic 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 Figure 1 below).

Basic Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political control over media outlets	Access to media for minorities
Protection of right to information	Media ownership concentration (horizontal)	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Cross-media concentration of ownership and competition enforcement	Media and democratic electoral process	Access to media for people with disabilities
Independence and effectiveness of the media authority	Commercial & owner influence over editorial content	State regulation of resources and support to media sector	Access to media for women
Universal reach of traditional media and access to the Internet	Media viability	Independence of PSM governance and funding	Media literacy

The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk. On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk. For more information on MPM methodology, see the CMPF report “Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2016 in EU-28, Montenegro and Turkey”, <http://cadmus.eui.eu/handle/1814/46786>



Disclaimer: The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, the MPM2017 scores may not be fully comparable with MPM2016 ones. For more details, see the CMPF report on MPM2017, soon available on <http://cmpf.eui.eu/media-pluralism-monitor/>



2. INTRODUCTION

Croatia is a country of approximately 4.3 million inhabitants situated between Central Europe, the Mediterranean and Southeast Europe. The main spoken language is Croatian. Croats make up more than 90 percent of the population. Croatia is a country with a multicultural and diverse minority population. There are 22 constitutionally recognized minorities. The main is Serbian with 4.4 percent followed by Bosnians (0.73%), Italians (0.42%), Albanians (0.41%), Roma (0.40%), and Hungarians (0.33%). The country has recently seen an influx of refugees from Africa, Syria and Iraq moving across the Western Balkan Route. The majority used the country as a transit route to Western European countries.

In 2017 the GDP grew at an average 2.7 percent rate. The year was marked by financial difficulties of the company Agrokor, a major national and regional retail company with multibillion euro annual revenue. Managing its financial crisis caused major political concerns and controversies due to its overall impact on the Croatian economy and workforce employment. The company is also the majority owner of the main print distribution company Tisak and a major media advertiser.

The government led by the Croatian Democratic Union (HDZ) and the Bridge of Independent Lists (MOST) established the parliamentary majority after the elections in September 2016. However, the year 2017 was marked by the reshuffling and breakup of the coalition in the parliament. The Croatian Democratic Union (HDZ) remained the leading party in power after it formed a new coalition with the Croatian People's Party – Liberal Democrats (HNS) - traditional partners of the Social Democratic Party (SDP).

According to the available EU-wide data, television was still the medium of choice in 2016 used by 87 percent of the population watching it on a TV set every day. It is followed by the internet (49%), radio (43%), and print with 19 percent (Eurobarometer, 2016). Internet access in households was at 76 percent in 2017 which is below the EU-28 average of 87 percent (Eurostat, 2018). Croatia ranked second in Europe in 2017 with 91 percent of internet users reading online newspapers and magazines (Digital Agenda, 2018). The value of the digital advertising market is increasing. In 2016 advertising expenditure was focused on television (51%), print (17%) and the internet (14%). Between 2008 and 2016 the share of print advertising fell from 35% to 17%. In the same time period, the internet advertising expenditure rose from 1% to 14% (HURA, 2018).

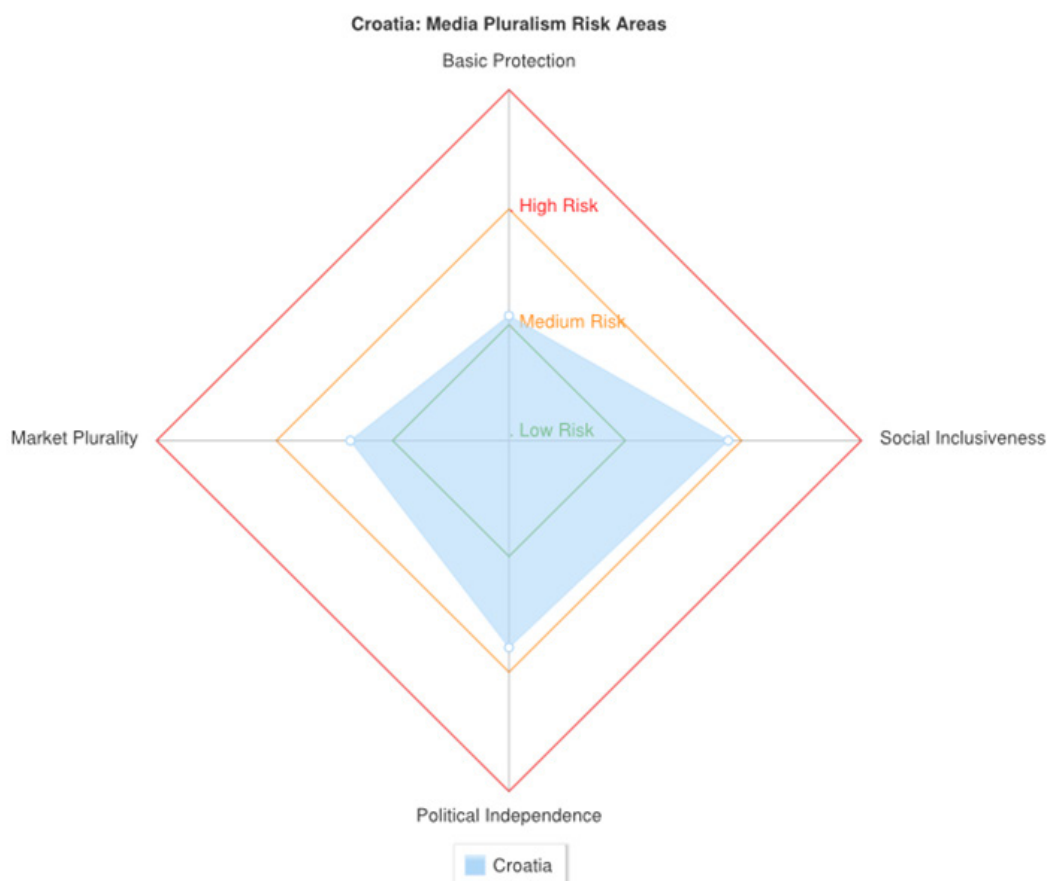
There have been no major legal or policy changes in the media sector in 2017. Reforms were announced multiple times but are continuously being delayed, thus exacerbating some of the well-known problems and issues in the media. These include politicized appointments and dismissals in the public service broadcaster (HRT), hate speech, poor working conditions for journalists, unresolved legal and financial status of non-profit and community media, and commercial influence over editorial content. Unresolved problems prompted two visits by the international mission for media freedom in 2016 and early 2018 led by the Southeast Europe Media organization (SEEMO), the European Federation of Journalists (EFJ), Reporters without Frontiers (RSF), European Centre for Press and Media Freedom (ECPMF), European Broadcasting Union (EBU), and the Association of European Journalists (AEJ).¹

1 See: <http://www.seemo.org/seemo-mission-to-croatia-2018.php>



3. RESULTS FROM THE DATA COLLECTION: ASSESSMENT OF THE RISKS TO MEDIA PLURALISM

The MPM assessment in Croatia scored a medium risk across all four main areas. Basic protection scores 36 percent. The main cause for concern in this area is access to the internet and insufficient high speed broadband coverage. In addition, the right to information is hampered by the reluctance of public authorities to provide requested information in a timely manner. Whistle-blowers have no legal protection in the country. Market plurality area scores 45 percent. A burning issue is commercial and owner influence over editorial content as well as poor regulation of cross-media ownership and competition. Political independence is highly problematic with a score of 59 percent. Major areas for concern are continuous political pressures in terms of appointments and dismissals in the public service broadcaster as well as overall poor management of the PSM, and poor legislative framework for appointing the General Director. The issues largely affected the scores in the indicators addressing editorial autonomy and the independence of PSM governance and funding. The continued political interference remains a top priority for media policy and reform. Finally, Social inclusiveness scores a medium risk of 65 percent. Amongst the most problematic indicators in this area is the access to media for minorities. While minorities do have access, it is not proportionate to the size of their population in the country. Such social inclusiveness issues are reflective of the overall trends in society and the impact of certain social groups on politics and decision making. For example, there were heated political debates over the adoption of the Istanbul Convention on the prevention of violence against women. Conservative social movements and civil society actors, as well as some members of the Croatian Academy of Sciences, argued against the Convention on the grounds that it introduces gender ideology. It was accepted by the Parliament with an interpretative statement.² Access to media for women is also highly problematic in this year's risk assessment. The PSM does not yet have a comprehensive gender equality policy.

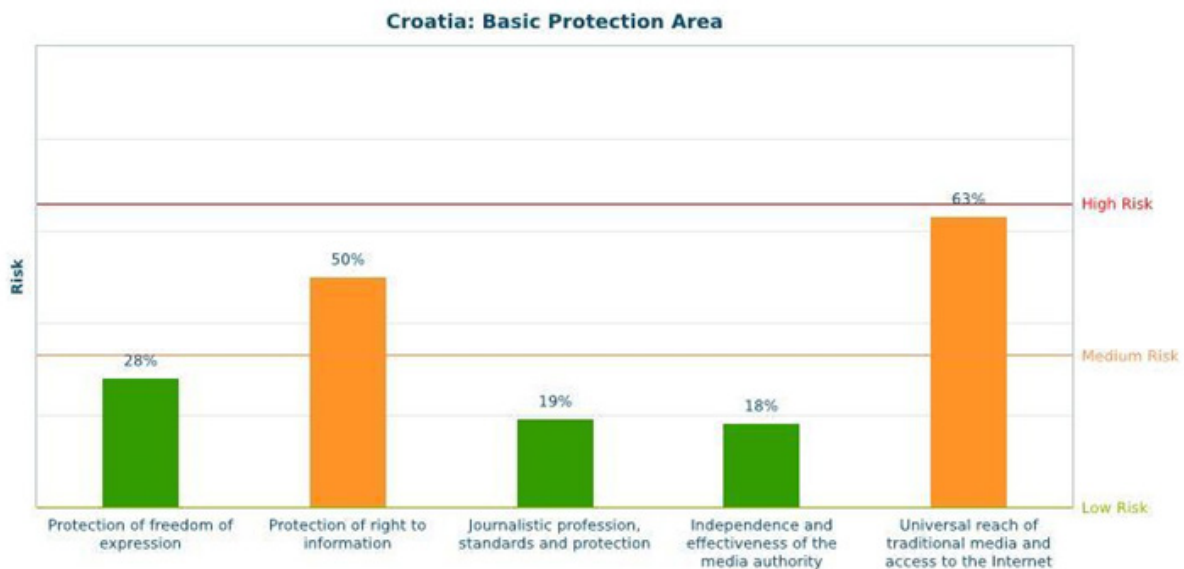


2 <http://www.sabor.hr/vecina-klubova-u-raspravi-podrzala-ratifikaciju-is>



3.1 BASIC PROTECTION (36% - MEDIUM RISK)

The Basic 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 competence to regulate the media sector; and the reach of traditional media and access to the Internet.



The Protection of freedom of expression indicator scores a low risk of 28%. The protection of freedom of expression in Croatia follows basic international standards. However, legal remedies against violations of freedom of expression are not always effective due to the generally slow court practice in civil lawsuits. Freedom of expression is generally respected although there are occasional violations. The state has not decriminalized defamation. Recently, there have been multiple cases of so-called Facebook arrest on the grounds of threats towards politicians and members of the ruling party.³ The line between freedom of expression and hate speech has become a much debated topic in the country with a general attitude towards imposing some kind of regulation of hate speech online. This has been announced but no concrete measures were presented to the public.

The Protection of right to information indicator scores a medium risk of 50%. The protection of the right to information is recognised in the Constitution and in national laws. Restrictions on grounds of privacy, state secrecy, public order and national security are defined in accordance with international standards. Appeal mechanisms for denial of access are in place although they are ineffective, especially with regard to public authorities' responses. There is a general trend towards widespread disregard for respecting the legally defined and timely delivery of requested information. There is no regulatory framework in place for protecting whistleblowers. Nonetheless, there have been no cases of arbitrary sanctioning of whistle-blowers to date.

The Journalistic profession, standards and protection indicator scores a low risk of 19%. Access to the journalistic profession is guaranteed by law and open in practice. The Croatian Journalists' Association (HND) publicly and actively promotes professional values. It is only partially effective in guaranteeing editorial independence. This can be attributed to its lack of decision making and enforcement powers. The protection of journalists is also problematic, as attacks and threats occur,⁴ especially towards minority media and journalists.⁵ The working conditions for journalists have consistently been deteriorating over recent years, especially due to the economic crisis.

The Independence and effectiveness of the media authority indicator scores a low risk of 18%. The appointment procedures to the media authority are designed to minimize the risk of political and commercial influence through the Prevention of Conflict of Interest Act. Tasks and responsibilities, sanctioning powers and appeal mechanisms of the authority are defined in detail in law. Appeal mechanisms seem to be effective and are not misused to delay the enforcement of remedies. The year 2016 saw political pressure towards the Council for Electronic Media (VEM)

3 See: <https://www.jutarnji.hr/vijesti/hrvatska/ravnatelj-policije-odgovarao-na-pitanja-o-facebook-hapsenjima-to-nije-novi-trend-ni-pojava-postupali-smo-tako-u-puno-slucajeva-vec-tri-godine/6355264/>

4 See: <https://mappingmediafreedom.org/>

5 See: <http://www.hnd.hr/hnd-osuduje-spaljivanje-primjeraka-tjednika-novosti-i-zahtijeva-jasan-stav-premijera-o-prijetnjama-novinarima>



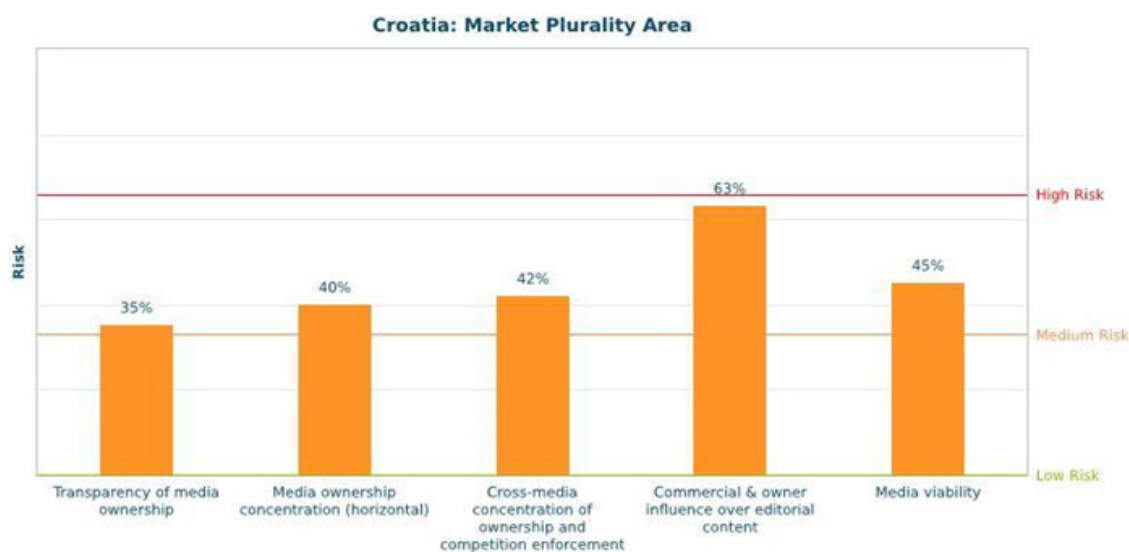
after a legally justified issue of a ban⁶ on the regional television broadcaster for repeated incitement to ethnic hatred in their talk show program.⁷ The former president of the Council for Electronic Media offered her resignation. Due to the premature fall of the parliamentary coalition the resignation offer never made it to the Parliament. Yet the Council President offered her resignation to the new government installed in September 2016 as well. It was only accepted in mid-2017 when the Council was reshuffled with new appointments and new members. Given that one member of the Council left in 2015 and was not immediately replaced the prolonged crisis of management stifled their potential for taking a proactive stance in media policy issues and regulatory activities. The situation is now resolved. The budgetary resources for the authority are transparent, objective and adequate. The authority is transparent and regularly publishes information about its activities.

The Universal reach of traditional media and access to the Internet shows a medium risk of 63%. The universal coverage of the PSM is guaranteed by the contract between the PSM and the government. The risk score of the indicator is raised by low broadband coverage in the general and rural population and low broadband subscription. Internet speed is generally low in the country too.

3.2 MARKET PLURALITY (45% - MEDIUM RISK)

The Market Plurality indicators examine the existence and effectiveness of the implementation of transparency and disclosure provisions with regard to media ownership. In addition, they assess the existence and effectiveness of regulatory safeguards to prevent horizontal and cross-media concentration of ownership and the role of competition enforcement and State aid control in protecting media pluralism. Moreover, they seek to evaluate the viability of the media market under examination as well as whether and if so, to what extent commercial forces, including media owners and advertisers, influence editorial decision-making.

The transparency of media ownership indicator scores a medium risk of 35 percent. The national law contains



media-specific provisions requiring the disclosure of ownership details to public bodies as well as regular updates to the ownership information. The law also stipulates sanctions for non-reporting of ownership information. The issue of the ultimate beneficial owners or individuals who ultimately control or own the company still remains problematic. In particular, the Act on money laundering and prevention of terrorism which was passed in late 2017 may reduce the transparency level of the ultimate owners.

The Media ownership concentration (horizontal) indicator scores a medium risk of 40%. Due to the small

6 See: <https://www.e-mediji.hr/hr/aem/priopcenja/priopcenje-vijeca-za-elektronicke-medije-privremeno-oduzimanje-koncesije-nakladniku-z1-televizija-doo/>

7 See: <https://www.e-mediji.hr/hr/aem/priopcenja/priopcenje-vem-vezano-uz-pravni-okvir-i-kontekst-regulacije-govora-mrznje-u-elektronickim-medijima/>



market size, rules on ownership concentration are difficult to enforce. For example, television is the most consumed medium in the country with foreign-based companies having the largest audience shares. The market share for the Top4 audiovisual media owners (PSM included) in Croatia is quite concentrated, reaching 96%, with an audience concentration for Top4 television channels of 59%. The radio market, by its turn, is regionally fragmented, with a market share for Top4 radio owners of 50% and audience concentration share of 40%. The market share for the Top4 newspaper owners is 83% and readership concentration in the sector reaches 45%. The print media has the obligation to submit a report on any ownership changes to the Croatian Chamber of Economy (HGK) and to the Agency for Market Competition Protection (AZTN). However, AZTN does not perform active monitoring but only reacts based on reports by the companies. In recent years it publicly called for the print media to duly report changes in ownership structures in accordance with the law. The electronic media report changes to the Council for Electronic Media (VEM) and AZTN.

The indicator on **Cross media concentration of ownership and competition enforcement** shows a medium risk of 42%. There is an over-complicated mechanism for monitoring cross-media ownership concentration that involves the HGK, which keeps track of ownership structures for print and print distribution companies, and the VEM, which monitors electronic media. In cases of cross-concentration, companies also have to report to the AZTN. This creates problems for keeping track of the changes and an overlap in regulatory duties between the bodies. The market share of Top4 owners across different media markets is 67%. The market share for the Top4 internet content providers is 52%. Audience concentration for internet content providers is 62%. In cases of cross-ownership there are no safeguards in competition law to protect media pluralism. The rules on disproportionate state aids which ensure that state funding of PSM does not cause disproportionate effects on competition are in place and the VEM monitors its compliance.

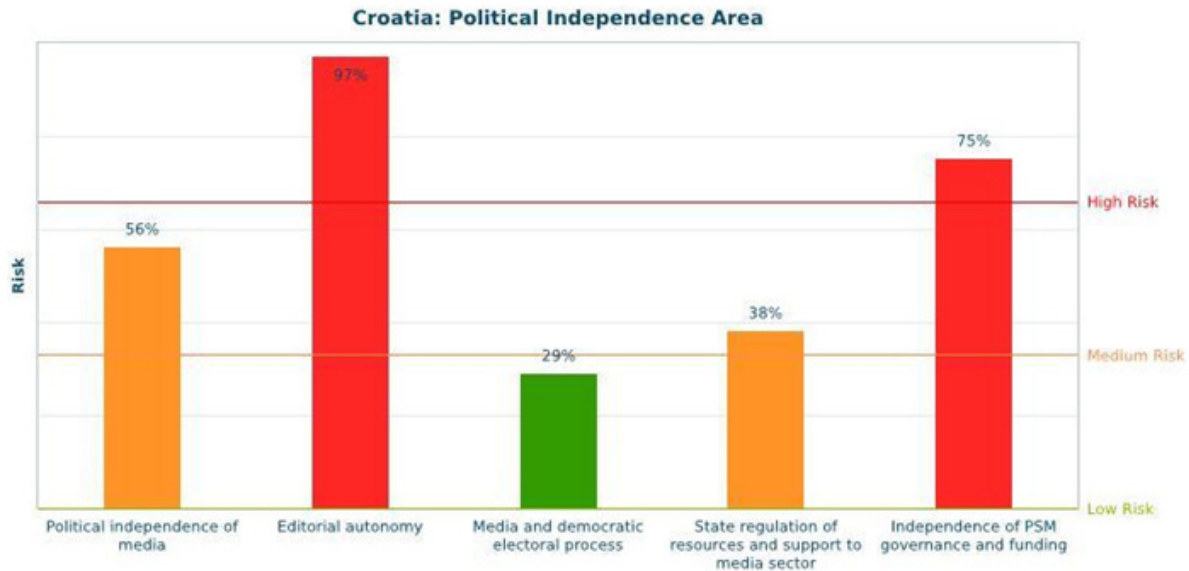
The indicator on **Commercial and owner influence over editorial content** scores a medium risk of 63%. In cases of ownership or editorial line changes, the only mechanisms granting some social protection to journalists are the highly ineffective self-regulatory media statutes. There are no regulatory safeguards seeking to ensure that decisions regarding appointments and dismissals of editors-in-chief are free from commercial interests. The Code of Ethics of the Croatian Journalists' Association, however, provides for some safeguards to prevent the commercial and advertising influence on journalists, but they are not effective in preventing media owners and other commercial entities to systematically influence editorial content. This is reflected in either direct promotion of favourable reports, or on a general lack of reports and negative views about major advertisers.

The **Media viability** indicator scores a medium risk of 45%. Consistent data on media viability in the media market as a whole is hard to obtain and difficult to evaluate. The revenues for the audiovisual and radio markets are slightly increasing. The revenues for print are experiencing a drop in all relevant categories for dailies and weeklies including sales (dropped 8% for dailies and 13 for weeklies between 2016 and 2015) and advertising (dropped 12% between 2016 and 2015). Specific support schemes and regulatory incentives for the media sector exist and include, for example, the Fund for the Promotion of Pluralism and Diversity.

3.3 POLITICAL INDEPENDENCE (59% - MEDIUM RISK)

The Political Independence indicators assess the existence and effectiveness of regulatory safeguards against political bias and political control over the media outlets, news agencies and distribution networks. They are also concerned with the existence and effectiveness of self-regulation in ensuring editorial independence. Moreover, they seek to evaluate the influence of the State (and, more generally, of political power) over the functioning of the media market and the independence of public service media.

The **Political control over the media outlets** indicator scores a medium risk of 56%. There are no explicit restrictions in media legislation that would include limits to party, partisan groups or politicians as owners in the definition.



Conflict of interest rules apply indirectly but there are no legal limitations to direct and indirect control of media. Political control over the PSM is particularly evident in the alignment of its editorial policies following parliamentary elections. Radio is often dependent on regional and local politics while the newspapers often support policies and viewpoints in line with the political leaning of its ownership.

The indicator **Editorial autonomy** scores a high risk of 97%. There are systematic cases of political interference in appointment and dismissals of editors-in-chief. Neither the Media Act, nor the Electronic Media Act contains safeguards to prevent this interference. This is particularly emphasized in the case of the PSM where dozens of editors and journalists are often dismissed immediately following parliamentary elections. Self-regulatory measures such as media statutes and the Code of Ethics of the Croatian Journalists' Association have proven to be highly ineffective in controlling political influence. This is one of most troubling indicators in the Croatian media system.

The **Media and democratic electoral process** indicator scores a low risk of 29%. Different groups of political actors are represented in a fair way on PSM coverage and private channels and services. The media law does not prohibit, or impose restrictions to political advertising on PSM during election campaigns to allow equal opportunities for all political parties. Therefore, the better funded campaigns have a better chance of reaching the voters.

The **State regulation of resources and support for the media sector** indicator scores a medium risk of 38%. The main mechanism for the distribution of direct government subsidies to media outlets is the Fund for the Promotion of Pluralism and Diversity. In 2016 the former Minister of Culture cut down the additional funding for non-profit media based on the redistribution of revenues from the lottery games awarded through a Non-Profit Media Committee within the Ministry of Culture. The allocation of the funds was transparent and publicly visible although not without some concerns. He disbanded the Committee and new funding mechanisms were never re-established. In the past several years non-profit media, primarily digital outlets, have been covering a wide array of socially relevant issues, providing counter-balance to commercially driven and politically influenced mainstream outlets in the country. The new Minister of Culture never established new mechanisms and has delayed the distribution of international funds from the European Social Fund, thus further perpetuating the crisis of the non-profit media. There are also indirect subsidies such as the reduced VAT and the allocation of state advertising.

The **Independence of PSM governance and funding** indicator scores a high risk of 75%. The PSM management appointment procedures are highly dependent on the Croatian Parliament which leaves room for systematic political

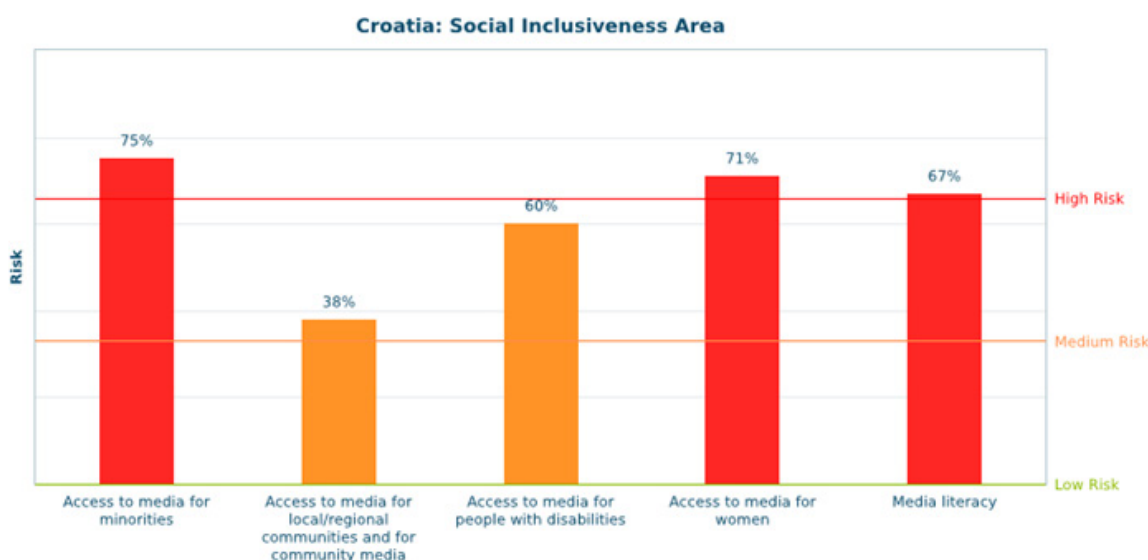


interference. Dismissals and appointments often occur after each parliamentary election. In 2016 there were three different individuals in the position of the General Director. The editorial structure was completely changed several times. In the period between 1 October and 11 November 2016 the HRT was operating without a legal representative and responsible General Director. Four of the five members of the Supervisory Committee are appointed by the Croatian Parliament. In July 2017 the Supervisory Committee was dismissed by the Parliament before the end of their mandate. The dismissals were met with strong opposition and criticism by the Croatian Journalists' Association. The dismissed Supervisory Committee submitted a 2016 report to the Parliament in which it exposed many irregularities in the management of the PSM. The report displays the state of the serious management crisis.

3.4 SOCIAL INCLUSIVENESS (62% - MEDIUM RISK)

The Social Inclusiveness indicators are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country's media literacy environment, as well as the digital skills of the overall population.

The Monitor indicates that **Access to media for minorities** is at a high risk of 75%. The law guarantees access to airtime on PSM channels to the constitutionally recognized minorities and the PSM is obliged to have special format



programmes for national minorities. However, consulted experts for minority issues describe PSM programmes as narrowly specialized and argue that the voice of the minorities is certainly not heard well in the broader society. Minorities that are not legally recognized do not have access to PSM channels in practice. Reports in PSM programmes are only sporadic. The legislation does not foresee an obligation to provide national news in minority languages. Most legally and non-legally recognized minorities do not have access to airtime on private TV or radio or it is not proportional to the size of their populations in the country.

Access to media for local/regional communities and for community media scores a medium risk of 38%, according to the Monitor. Authorities support regional/local media by a limited number of policy measures or subsidies. The state subsidies available through the Fund for the Promotion of Pluralism and Diversity are distributed to media based on a clear set of criteria but it is unclear whether they are always fair. The community media have a specific status as non-profit providers of media services and electronic publications as well as non-profit producers of audiovisual and/or radio programmes. They largely depend on the state budget. Available funding through the Ministry of Culture for non-profit media was cut in 2016 and no new funding mechanisms were established.

The policy on access to media content by people with disabilities is underdeveloped (medium risk of 60% according to the Monitor). The existing policies are nascent and the measures taken are fragmented. The legal requirements



for access services, including signing and audio description, for people with disabilities are still only partially implemented. The media laws require access services for people with disabilities but do not apply to on-demand audiovisual media. The support for people with hearing impairments and blind people in audiovisual media is available only in the least popular scheduling windows.

Access to media for women is at high risk (71%). The National Policy for Gender Equality foresees various measures in the field of media such as creating general awareness of gender policies, and funding production and co-production of sensitized media contents. The equal rights law seems to be implemented effectively in the field of media. However, the PSM does not have a gender equality policy in the Agreement between the Government of the Republic of Croatia and the Croatian Radio and Television. At the time of data collection for the Monitor in October 2017 the management board of the PMS was not complete. The share of women among members of management boards of private TV companies was 40%.

The **Media literacy** indicator scores a medium risk of 67%. The policy on media literacy is still nascent and the measures taken so far are fragmented. Part of the curriculum of the Croatian language courses in elementary and high schools covers topics related to media literacy. The Agency for Electronic Media developed materials for the parents, teachers and children on media literacy. However, there is no comprehensive national agenda that would qualify as a media policy with clear strategic goals, concrete commitments and timeline for the implementation of measures. The training programme in media literacy of teachers is limited and merely a small number of teachers are exposed to training in media literacy. However, a trend of increasing number of professional development programmes in media literacy is visible in the past five years. The subject of media literacy is present in non-formal education but only to a limited extent. Activities on media literacy are still limited to some part(s) of the country or to certain groups of people.

4. CONCLUSIONS



In 2017 there were no policy or legislative changes in the media sector. The lack of action exacerbated many systemic problems evident in the past few years. These include poor working conditions for journalists, insufficient high speed broadband coverage, and reluctance of public authorities to provide requested access to information in a timely manner. Among the most problematic areas are commercial and owner influence over editorial content as well as poor regulation of cross-media ownership and competition, continuous political pressures towards the public service broadcaster, access to media for minorities, unresolved legal and financial status of non-profit and community media, and the lack of comprehensive national strategy for media literacy. The following is a list of recommendations based on some of the key areas identified by the Croatian country team while carrying out the Media Pluralism Monitor implementation in 2017.

Basic Protection:

- Ensure better protection of journalistic profession by supporting professional associations and promoting better implementation, and monitoring, of self-regulatory statutes and ethics codes.
- Improve the high-speed internet broadband coverage in the country.
- Ensure protection of editorial independence in the Media Act (OG 59/04, OG 84/11, and OG 81/13) and the Electronic Media Act (OG 153/09, OG 84/11, OG 94/13, and OG 136/13). This especially relates to commercial and owner influence over editorial content.

Market Plurality:

- Establish a single ownership register for all media. A single media authority needs to be designated to monitor compliance of cross-ownership rules. The current institutional monitoring is over-complicated and impossible to coordinate in an efficient manner.
- Expand the definition of connected persons (article 53) in the Electronic Media Act (OG 153/09) to include limits to party, partisan groups or politicians as owners. Introduce a similar definition in the Media Act and ensure limits to political influence on editorial content.

Political Independence:

- Expand the definition of connected persons (article 53) in the Electronic Media Act (OG 153/09) to include limits to party, partisan groups or politicians as owners. Introduce a similar definition in the Media Act and ensure limits to political influence on editorial content.
- Re-establish funding schemes for non-profit media while ensuring clear criteria, transparent allocation of the funds and media independence.
- Ensure less political interference in PSM management by amending the Croatian Radio-Television Act (OG 137/10, OG 76/12, and OG 78/16).

Social Inclusiveness:

- Ensure better representation of minorities in the media system, particularly through the existing legally defined cooperation between the Council of National Minorities, an autonomous body for the promotion of right of national minorities, and the PSM. Revise the existing legislation to improve access to PSM and private channels in prime-time programs for people with disabilities.
- Promote the development of a gender equality policy for the PSM by amending the contract between the government and PSM.
- Create a consistent and comprehensive national media literacy strategy through coordinated action by the Ministry of Science, Education and Sports and the Ministry of Culture.



ANNEXE 1. COUNTRY TEAM

The Country team is composed of one or more national researchers that carried out the data collection and authored the country report.

First name	Last name	Position	Institution	MPM2017 CT Leader (please indicate with X)
Paško	Bilić	Research Associate	Institute for Development and International Relations	X
Antonija	Petričušić	Assistant Professor	Faculty of Law, University of Zagreb	
Ružica	Eterović	Independent researcher		

ANNEXE 2. 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
Damir	Hajduk	President	Council for Electronic media (VEM)
Saša	Leković	President	Croatian Journalists' Association (HND)
Antonija	Letinić	Chief editor	Kulturpunkt portal
Zrinjka	Peruško	Full professor	Faculty of Political Science, University of Zagreb

ANNEXE 3. SUMMARY OF STAKEHOLDERS MEETING

- 9 April 2018
- Institute for Development and International Relations, Zagreb
- **List of participants** (name, affiliation)
 - Paško Bilić, MPM Local coordinator
 - Antonija Petričušić, MPM Croatian team member
 - Damir Hajduk, President of the Council for Electronic Media (VEM)
 - Saša Leković, President of the Croatian Journalists' Association (HND)
 - Antonija Letinić, Kulturpunkt
 - Jaka Primorac, Institute for Development and International Relations
 - Nada Švob-Đokić, Institute for Development and International Relations

Key topics discussed



The meeting opened with a short overview of the MPM methodology for 2017. The results across all domains, indicators and variables were examined. The focus was on the areas that present major risks for media pluralism. Key topics included the resignation by the former President of the Council for Electronic Media and new appointments in the Council for Electronic Media. The potential for establishing a common ownership register for print and electronic media was also discussed. The discussion then shifted to the management crisis of the PSM and the problems with the Croatian Radiotelevision Act. A major issue is the procedure for appointing the General Director which should be changed in order to reduce the risk of political control, and to resolve the ongoing management crisis. The issue of editorial independence was discussed in light of poor self-regulation and the (lack of) implementation of so-called "media statutes". The existing legislation could be improved by ensuring that media statutes are implemented, that the implementation is monitored, and that the breaches are sanctioned. Other topics of discussion were the lack of a comprehensive, national media literacy strategy, and fragmented efforts for promoting media literacy. There are also no strategies for further development of the non-profit media sector and for establishing a clear legal status for community media.

Conclusions

- The stakeholders welcomed the analysis and media policy suggestions, particularly in light of the announced revisions of media legislation by the Ministry of Culture.



