

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, THE REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2021

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 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 carried out in 2021. 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), Dr Toni Prug (University of Rijeka), 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 Annexe 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).

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful 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 digital-specific risk scores, and the report contains a specific analysis of risks 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 indicators, scores of 0 are rated 3% while scores of 100 are rated 97% by default, in order to avoid an assessment of total absence, or certainty, of risk.

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 that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2022 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 MPM2022, available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

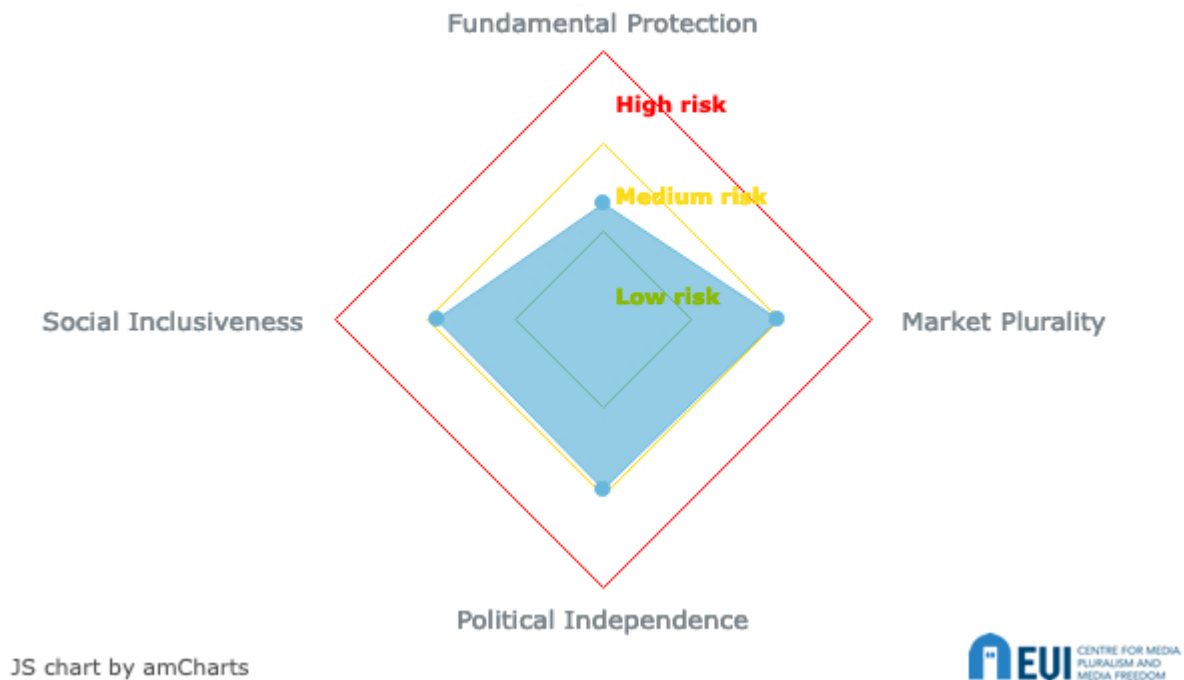
- **Country overview:** Croatia is a country with a population of 3.8 million inhabitants (Croatian Bureau of Statistics, 2022a). The population has been steadily decreasing since the 1990s. The total population was 4.7 million in 1991, 4.4 in 2001, and 4.2 in 2011. Geographically, the country is situated between Central Europe, the Mediterranean, and Southeast Europe with a long Adriatic Sea coastline.
- **Languages:** The main spoken language is Croatian.
- **Minorities:** Croats make up more than 90 percent of the population. The country is multicultural, with 22 constitutionally recognized minorities. The main is Serbian (4.4%), followed by Bosnians (0.73%), Italians (0.42%), Albanians (0.41%), Roma (0.40%), and Hungarian (0.33%), according to the 2011 census data (Government of the Republic of Croatia, 2021).^[1]
- **Economic situation:** In 2020, the GDP declined (in real terms) by 8.4% compared to 2019. In 2021, the GDP grew by 10.4% (in real terms) compared to 2020, second only to Ireland within the EU (Croatian Chamber of Commerce, 2022). The GDP reached 431.454 million Croatian Kuna in 2021 (Croatian Bureau of Statistics, 2022b). Croatia is heavily reliant on the service sector and tourism, which was strongly impacted by COVID-19 mobility restrictions. In 2021 there was a significant recovery of overnight stays for domestic and foreign tourists, although it did not reach pre-pandemic levels (Croatian Chamber of Commerce, 2022).
- **Political situation:** Between 1945 and 1991, Croatia was one of six republics of the Socialist Federal Republic of Yugoslavia. After the dissolution of Yugoslavia, and since Croatian independence was declared in 1991, the HDZ (centre-right/right-wing) party won most parliamentary elections. The Social-Democratic Party (SDP) formed the government between 2000 and 2003, and between 2011 and 2015. The Croatian Democratic Union (HDZ), in coalition with minority representatives, liberal democrats (HNS), and Reformists, formed a government after July 2020 parliamentary elections.
- **Media market and regulatory environment:** Total media advertising expenditure declined in 2020 due to the COVID-19 pandemic and reduced economic activity. Total advertising expenditure, across all media, dropped by 10% between 2020 and 2019. It recovered in 2021, although it was still 3% lower than in 2019. The biggest decline was recorded for print and radio. Internet (without social and search) recorded growth in the same period (HURA, 2022). In terms of news sources, television (through a TV set) was the main source (39.9%) in 2021, followed by online newspapers (16.4%), web portals (15%), and social media (13.8%). Internet users prefer to access news directly on media websites (43.3%), social media (42.9%), searching the media brand (42.5%), or searching particular news through search engines (27.3%) (Vozab and Peruško, 2021). The media sector is within the purview of the Ministry of Culture and Media. The main regulatory body is the Council of the Agency for Electronic Media (AEM). There is no regulatory body for the print media. Print media report ownership changes to the Croatian Chamber of Commerce (HGK). The main professional association protecting the interests of journalists is the Croatian Journalists' Association (HND). One of the biggest risks for media pluralism is the presence of strategic lawsuits against public participation (SLAPPs). In April 2021, there were 924 active lawsuits (HND, 2021). Some of them were strategically raised by individuals, politicians, judges, and the public service broadcaster (HRT) bringing their journalists to court. The former Director-

General of the HRT is currently under charges for corruption and was dismissed by the Supervisory Committee in July 2021. In December 2021, a new Electronic Media Act (OG 111/21) was passed transposing the AVMS Directive. The Act brought more technical than substantial changes aimed at improving media pluralism in Croatia. It was not based on strategic documents for the development of the media system.

- **COVID-19:** Croatia saw the poor implementation of the vaccination strategy and poor communication by the Civil Protection Headquarters and the government's Scientific Council to the general public. This has led to an increase in the number of deaths in late 2021 and early 2022. Only 55% of the population is fully vaccinated in March 2022 (Our World in Data, 2022). There were ongoing criticisms of the introduction of COVID certificates with right-wing parties mobilising anti-vaccination sentiments to organize a referendum and destabilize the government. The media suffered initial cuts in sales and advertising but the industry is slowly recovering, although not to the pre-pandemic level. Freelance journalists suffered the most from the effects of the pandemic.

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

Croatia: Media Pluralism Risk Areas



Croatia scores medium risk in all four domains: Fundamental Protection (43%), Market Plurality (65%), Political Independence (63%), and Social Inclusiveness (62%). The results are comparable to the previous edition of the MPM. Consistency depends on the poor quality of industry data, outdated data, or a complete lack thereof. This is particularly evident in the Market Plurality area and indicators such as Media viability. There are no official statistics on the number of employed journalists which makes it difficult to evaluate the general situation in the media, especially during the pandemic. The evaluation of digital indicators also suffers from incomplete or non-existent data.

In the **Fundamental Protection** (43%) area, the Journalistic profession, standards, and protection scores high risk. In April 2021, there were 924 active SLAPP cases, according to the Croatian Journalists' Association (HND, 2021). Although announced as such, the Electronic Media Act (OG 111/21) did not change the appointment procedures to ensure better independence of the Council for Electronic Media. Academic and expert reports have previously indicated that the parliamentary majority has too much power in nominating and appointing members of the Council for Electronic Media (INDIREG, 2011; Lisičar, 2016). In addition, the Council was a part of a public scandal in 2021 after a concession for a popular radio station was not extended. It was instead granted to an owner with ownership connections through other business entities with several radio stations. This opened the question of ownership transparency and concentration in the radio market.

In the **Market Plurality** (65%) area the high-risk indicators are the Online platforms concentration and competition enforcement, and the Commercial and owners' influence over editorial content. Most data on media ownership is easily accessible and searchable on the website of the Agency for Electronic Media. Print ownership structures are slightly more difficult to access as they are monitored by the Croatian Chamber of Commerce. Ultimate beneficial owners can still be hidden behind business entities. The online advertising market is unregulated through media-specific laws. Taxation of digital services is not a part of

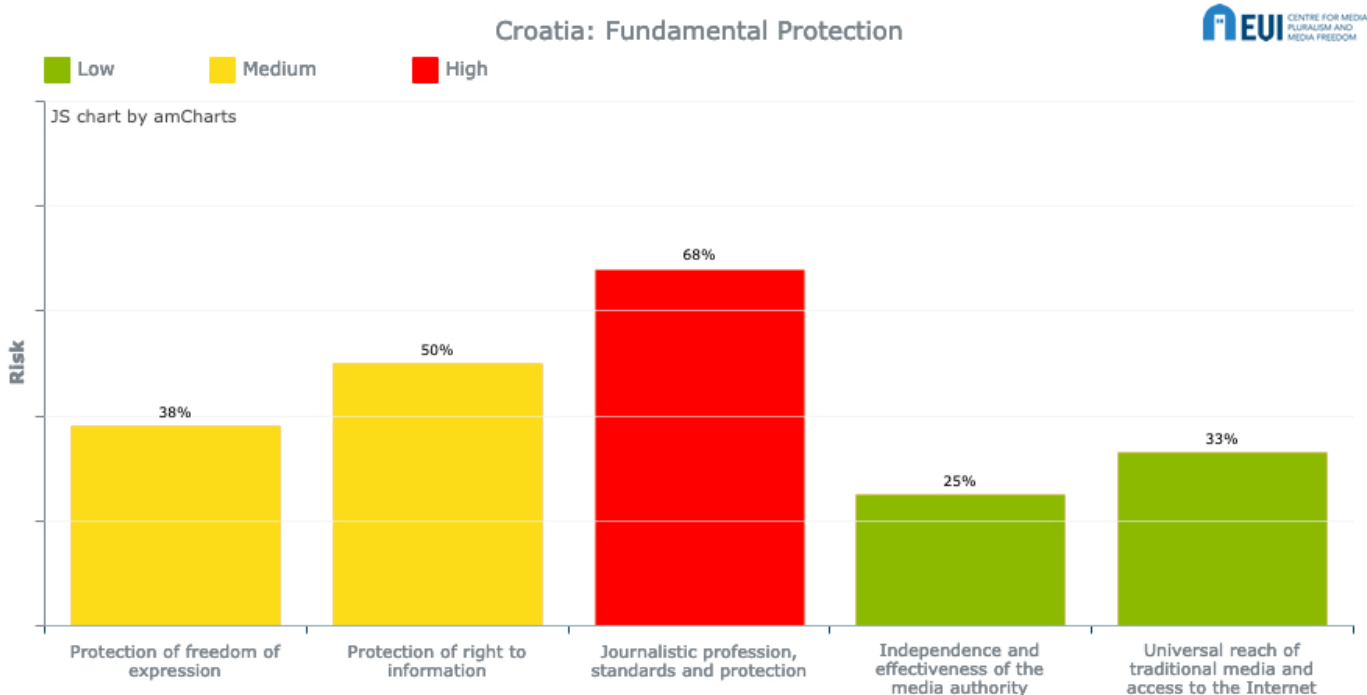
the public policy debate in the country. The working positions of journalists are precarious. Legal and self-regulatory mechanisms are inefficient in protecting journalists from commercial interests.

In the **Political Independence** (63%) area the Editorial autonomy, Political independence of media, and Independence of PSM governance and funding all score high risk. Media statutes and ethics codes are highly inefficient in securing editorial autonomy. The appointment of the PSM Director-General is done by a majority vote in the Parliament. The Director-General spent a portion of 2021 incarcerated, under suspicion for influence peddling/trading in influence.

In the **Social Inclusiveness** (62%) area, the results have not changed since last year. Access to media for women and Media literacy are high-risk indicators. Women are underrepresented at the executive level of the PSM and private TV media. The media usually report about women in a stereotyped fashion. Despite activities of the main regulator in the field of media literacy and several non-governmental organizations covering a variety of issues ranging from children’s literacy, digital skills, film literacy, and other areas, there is no national strategy targeting media literacy in the general population. There is a need to ensure broader implementation of media literacy in elementary and high school education through adequate education and training for teachers. Media and digital literacy is mentioned in the 2030 National Development Strategy (Croatian Parliament, 2021) and the Recovery and Resilience Plan 2021-2026 (Government of the Republic of Croatia, 2021). However, the Ministry of Culture and Media, while openly promoting media literacy, has not specified or created any strategies that would provide measurable outcomes and benchmarks to reach these proclaimed goals.

3.1. Fundamental Protection (43% - 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 43 percent, a slight increase from the 2020 assessment of 42 percent. Risk percentages per indicator remain the same except for the Journalistic profession, standards, and protection. This indicator saw an increase from 62 to 68 percent, which reflects attacks and threats to journalists, both men, and women, as well as precarious working positions of freelance workers who suffer from insufficient social security or collective provisions.

The **Protection of freedom of expression** indicator scores medium risk of 38 percent. The country follows international freedom of expression standards in the Constitution and media legislation. Insult (Article 147), shaming (Article 148), and defamation (Article 149) are the main mechanisms for violating freedom of expression. They are considered criminal offenses in line with the Criminal Code and are punished with fines (OG 125/11; 144/12; 56/15; 61/15; 101/17; 118/18; 126/19; 84/21). As signatories to the Code of Practice on Disinformation, online platforms have been asked to improve their transparency. However, reports are self-reported and not conducted by independent bodies. Only a fraction of removals are done by following national legislation and government requests. Other removals are not done transparently.

The **Protection of right to information** scores medium risk of 50 percent. The right is recognised in the Constitution and the Access to Information Act (OG 25/13; 85/15). The Information Commissioner (2021) reports that the biggest number of appeals relates to 'management silence'. Access to information is mostly exercised through the direct involvement of the Information Commissioner. Croatia passed the Whistleblowers Protection Act (OG 17/19) in 2019. However, local NGOs stressed that the allocated funds for the full implementation of the law were insufficient. There was no action plan for the implementation of the law. In 2021, a whistleblower case gained media attention after an employee of a utility company exposed bribery and corruption, which led to the arrest of a local mayor and three politicians. After the arrests, the employee lost her job and is now taking the case to court based on the Whistleblowers Protection Act. A new act (OG 46/22) was passed April 2022 to better align with the EU Directive 2019/1937.

The **Journalistic profession, standards, and protection** indicator scores high risk of 68 percent. The Croatian Journalists' Association (HND) publicly promotes professional values and cooperates with national and international NGOs, academic communities, and professional associations. The HND has a Journalistic Council of Honour, which regularly issues warnings, breaches, and severe breaches. However, self-regulatory measures do not improve professional standards in the country. According to the HND (2021), there were 924 active lawsuits against journalists in April 2021 demanding retributions totaling 78.5 million Croatian Kuna (10.4 million EUR). Some of them were strategically raised in large numbers by individuals, especially politicians and judges. A large number of lawsuits were raised by the public service broadcaster (HRT) and directed toward their journalists. The former Director-General of the HRT is currently under charges of corruption and was dismissed by the Supervisory Committee (HINA, 2021). Working conditions for journalists have consistently been deteriorating over the past decade and a half, especially after the 2008 economic crisis. The COVID-19 pandemic has sped up some of these processes. Freelancers and self-employed journalists often work without social security protection. Minimal protection is offered for trade union members, but it is only partial and not sufficient for subsistence. There were multiple death threats and attacks on the physical and online safety of journalists in 2021. In December 2021, Croatian fact-checking website Faktograf received threats of physical violence and death threats after a well-known businessman directed his followers on social media to set up a joint fund to sue the platform. In November 2021, multiple journalists faced insults and hostility as they tried to cover a protest in the capital of Zagreb against government measures introducing mandatory COVID-19 vaccine certificates. In November 2021, a

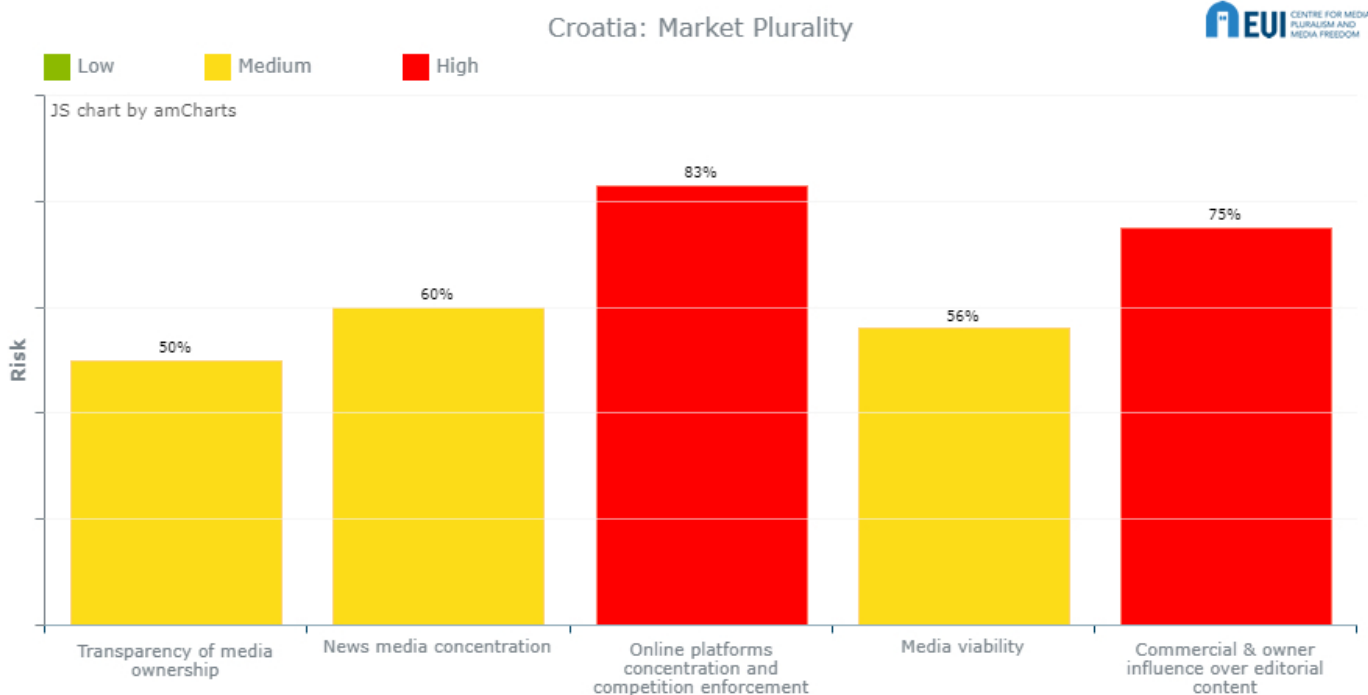
journalist was subjected to a torrent of abuse and insults online after he published a controversial column about what he called the politicisation of the victims of the Battle of Vukovar. In July 2021, a journalist was physically attacked by individuals burning the LGBT flag. The HND (2020) reports that there were 64 attacks and threats directed at journalists between 2015 and 2020. Out of nine attacks in 2020, the State Attorney only raised two cases. Many other cases from previous years are still not closed. There is no legal framework to prevent SLAPPs. The Ministry of Culture and Media acknowledges the problem and has set up a working group and a round table to discuss the issue. No direct results of this activity have been presented to the public.

The **Independence and effectiveness of media authority** scores a low risk of 25 percent. Low risk reflects the fact that duties and responsibilities of the authority are defined in the Electronic Media Act (OG 111/21), sanctions for breaching the law are defined, and appeal mechanisms against the authority's decisions are in place. There have been no arbitrary government overrulings of the authorities' powers. Budgetary resources are defined in law, which prevents political interference. Article 81 of the Electronic Media Act (OG 111/21) states that the budgetary resources for the functioning of the Agency are allocated by the annual financial plan of the Agency from 0.5% of the total annual gross income from the previous year by electronic media operators. In practice, however, the appointment procedures of the Council members can be problematic. Academic studies (INDIREG, 2011; Lisičar, 2016) outline the fact that they can be re-elected an unlimited number of times which can have negative effects on the independent decision-making processes. The parliamentary majority has too much power in nominating and appointing members of the Council. Lisičar (2016) also argues that the definitions of expertise and qualifications necessary for the election to the Council of Electronic Media are very broad and open to multiple interpretations. The new Electronic Media Act (OG 111/21) introduced minor changes and specified qualifications in the fields of media, journalism, technology, economics, sociology, and law necessary for the election to the Council. In 2021, the Council was in the midst of a public scandal due to an expired concession of Radio 101, was one of the most important radio stations offering critical voices during the 1990s. The concession for Radio 101, which was not extended, was instead granted to an owner who has a variety of ownership connections through different business entities with several other radio stations. This opened the question of proper implementation of the legal and regulatory duties of the Council, especially concerning ownership transparency and market concentration, as well as questions of conflict of interest among some Council members.

The **Universal reach of traditional media and access to the internet** indicator scores medium risk of 33 percent. The universal coverage of the PSM is guaranteed by the contract between the PSM and the government. The majority of the population is covered by the signal of all public television and radio channels (DVB-T2), as well as by broadband internet. Regulatory safeguards for net neutrality are implemented in practice.

3.2. Market Plurality (65% - medium risk)

The Market Plurality area focuses on the economic risks to media pluralism which derive from a lack of transparency and the concentration of ownership, the sustainability of the media industry, the exposure of journalism to commercial interests. The first indicator examines the existence and effectiveness of provisions on the transparency of media ownership. Lack of competition and external pluralism are assessed separately for the news media (production of the news) and for the online platforms (gateways to the news), and we consider separately horizontal and cross-media concentration; the concentration of the online advertising market; and the role of competition enforcement. The indicator on media viability measures the trends in revenues and employment, in relation to GDP trends. The last indicator aims to assess the risks to market plurality that are posed by business interests, in relation to the production of editorial content, both from the influence of commerce and owners.



The Market Plurality area scores a medium risk of 65 percent, a decrease from the 71 percent score in 2020. The result is affected by a lack of data and data inconsistency. The transparency of media ownership and Commercial & owner influence over editorial content indicators remain the same as in 2020. The News media concentration, Online platforms concentration, and competition enforcement, and Media viability indicators have seen a decrease from 68 to 60, 88 to 83, and 73 to 56 percent respectively.

The **Transparency of media ownership** indicator scores a medium risk of 50 percent. 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 registers of all relevant media. In the previous version of the Electronic Media Act, the media reported ownership changes on an annual basis. In Article 61, paragraph 1 the new Electronic Media Act (OG 111/21) requires all electronic media to report changes within five days. Paragraph 5 states that 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. There is a similar provision in Article 32, paragraph 2 of the Media Act (OG 54/04) which states that all publishers are required to deliver information about whether the stock or shares are owned individually or by 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. Yet the laws do not have an explicit definition of the ultimate beneficial owner which can still be hidden.

The **News media concentration** indicator scores a medium risk of 60 percent. The new Electronic Media Act (OG121/11) introduces the notion of the dominant market position (Article 65), which is reached when a media service provider, or electronic publication, reaches 40 percent of annual revenue within the market. Electronic publications are not included in cross-media concentration restrictions (Article 64) and the rules are still unclear. A new provision (Article 64, para 4) of the Electronic Media Act (OG 111/21) states that all the regulations apply adequately to providers of media services via satellite, internet, cable, and other permitted forms of transmission. This implicitly includes electronic publications although they are not mentioned as such in this article. In 2020, the top 4 audio-visual media owners in the country accounted for 96 percent of the market.^[2] The audience concentration of the top 4 audio-visual media owners in the country in 2021 was 55 percent.^[3] The market share of the top 4 radio owners was 72 percent in 2020.^[4] The audience concentration of the top 4 radio owners in 2021 was 39 percent.^[5] We received no new data for newspaper owners in terms of market shares. The lack of data affects the score of the indicator in comparison to 2020. The top 4 newspapers in the country accounted for 18 percent of the readership.^[6] The market share of the top 4 online news media in the country was 50 percent.^[7] The audience share of the top 4 online news media was 83 percent.^[8]

The **Online platforms concentration and competition enforcement** scores a high risk of 83 percent. Side door access for news is becoming increasingly relevant and the majority of people access online news through social media and search engines. There is no data on the audience concentration of the top 4 online players (news media and intermediaries included). According to the last available data, Google and Facebook captured 76,3 percent of the digital advertising market in Croatia in 2018 (Bilić, Prug, and Žitko, 2021). The high degree of concentration in the digital market can be prevented through the enforcement of competition rules but there are no advertising laws or regulatory bodies monitoring concentration in the advertising market. The country has not introduced or scheduled any form of taxation of digital services.

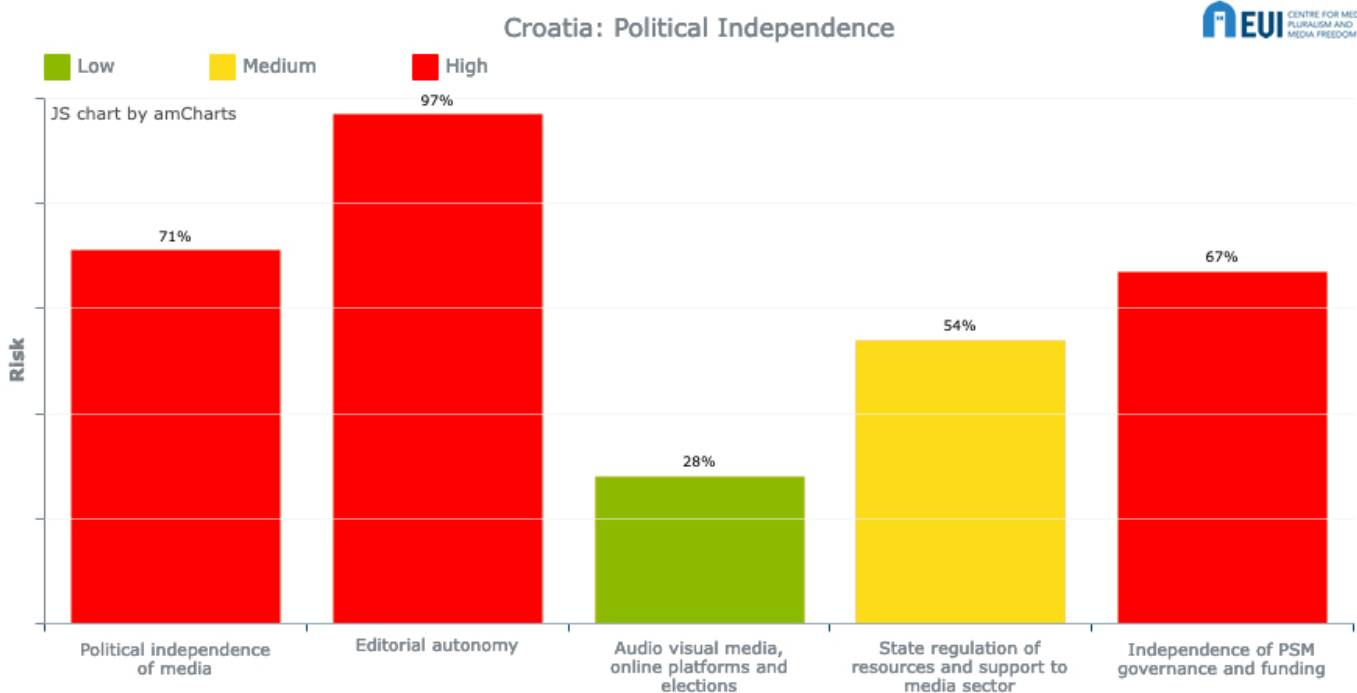
The **Media viability** indicator scores a medium risk of 56 percent. Consistent, relevant, and official data sources for this indicator in Croatia are difficult and, sometimes, impossible to obtain. Revenues for the audio-visual and radio sector have been stationary. We received no data on the revenues of the newspaper publishing industry, local media, or digital native news in 2021. There are no official statistics that specify the difference between native news, online traditional news media, and online platforms. Advertising data is usually compiled under the 'internet advertising' category by the industry association, while 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 7 percent between 2021 and 2020 (HURA, 2022). Many news portals in Croatia introduced paywalls in 2021 (e.g. Jutarnji List, 24 sata, Telegram, Večernji), making a large section of their content available through subscription only. 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.

The **Commercial and owner influence over editorial content** scores a high risk of 75 percent. Media statutes as self-regulatory acts (Article 26 of the Media Act (OG 59/04)) are created to regulate the participation of journalists in cases of appointing editors, managing working conditions, determining journalistic responsibility, resignation procedures due to ownership or management changes that alter

program schemes and content (so-called consciousness clause). However, media statutes are highly inefficient in protecting journalists from commercial interests. Commercial influence often results in favourable reports and avoiding negative views about major advertisers.

3.3. Political Independence (63% - 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 63 percent. Scores for the Editorial autonomy and the Independence of PSM governance and funding indicators remain the same as in 2020. The Audio-visual media, online platforms, and elections saw a slight decrease from 31 to 28 percent, the State regulation of resources and support to the media sector increased from 46 to 54 percent and the Political independence of media from 63 to 71 percent.

The **Political independence of media** scores a high risk of 71 percent. The elevated risk assessment compared to 2020 is the result of procedural problems in radio frequency spectrum allocation by the Council for electronic media. Prevention of Conflict of Interests Act (OG 26/11, 12/12, 124/12, 48/13, 57/15, 143/21) indirectly regulates restriction of media ownership for politicians, banning conflict of interest. The 2021 changes to the law caused plenty of public debate. While the new version of the law expands the categories of persons the law applies to, the designated body monitoring compliance with the law - the Committee for Resolving Conflicts of Interest - saw some changes (both expansion and reduction) with regards to its sanctioning/enforcement powers. GRECO (2021) issued a negative opinion on the law's alignment with GRECO recommendations before the 2021 adoption. The amendments to the HRT Act in 2012 provided for the election of a Director-General of the HRT with a majority vote of Parliament. The majority of the Group of expert members agree with the assessment of the presence of high risk and political control over the audio-visual media. Radio, particularly at the local level, is also highly influenced by political interests. In terms of newspapers and digital native media, the majority of the Group of expert members evaluate the risk

from political dependence as medium risk. The Croatian Informative News Agency (HINA) is the leading news agency in Croatia. According to the Croatian News Agency Act (OG 96/01), the Management Board of HINA is appointed and dismissed by the Croatian Parliament (4 out of 5 members). All experts agree with the high-risk assessment of the independence of HINA.

The **Editorial autonomy** indicator scores a high risk of 97 percent. Neither the Media Act (OG 59/04, 84/11, 81/13) nor the Electronic Media Act (OG 111/21) contains safeguards to guarantee autonomy when appointing and dismissing editors-in-chief. The vast majority of media statutes are usually not made public. The Croatian Journalists' Association has a Journalistic Council of Honour which monitors the behaviour of journalists according to its Code of Ethics. While it monitors implementation and issues warnings, breaches, and severe breaches, its effectiveness does not seem to improve the overall editorial independence in the country. In a 2021 study on a sample of 23 journalists and editors, two-thirds answered that they have witnessed pressures on editorial independence (of both commercial and political nature) while performing their jobs (Klancir, 2021).

The **Audio-visual media, online platforms, and elections** indicator scores a low risk of 28 percent. The HRT Act (OG 137/10, 76/12, 78/16, 46/17, 73/17, 94/18) and the Contract with the Government (2018-2022) do not have explicit access guarantees for political actors during elections. Access to airtime is governed through the Rules for Electronic Media with a National Concession in the Republic of Croatia. The PSM aligns its editorial policy during each election cycle through self-regulation. In general, different groups of political actors and/or viewpoints are represented in a biased way in the PSM channels. The group of expert members agrees with the high-risk assessment of PSM political bias. Experts also agree that different groups of actors are represented fairly on private channels during elections. There are no regulatory measures to ensure equal opportunities in online media during electoral campaigns. The requirement to separately report social media costs as part of campaign costs came into effect in 2019. After two elections since then, it is clear that there is room for improvement in the practice of reporting social media campaign costs. Not all candidates/parties are equally meticulous in filling out forms and submitting accurate data.

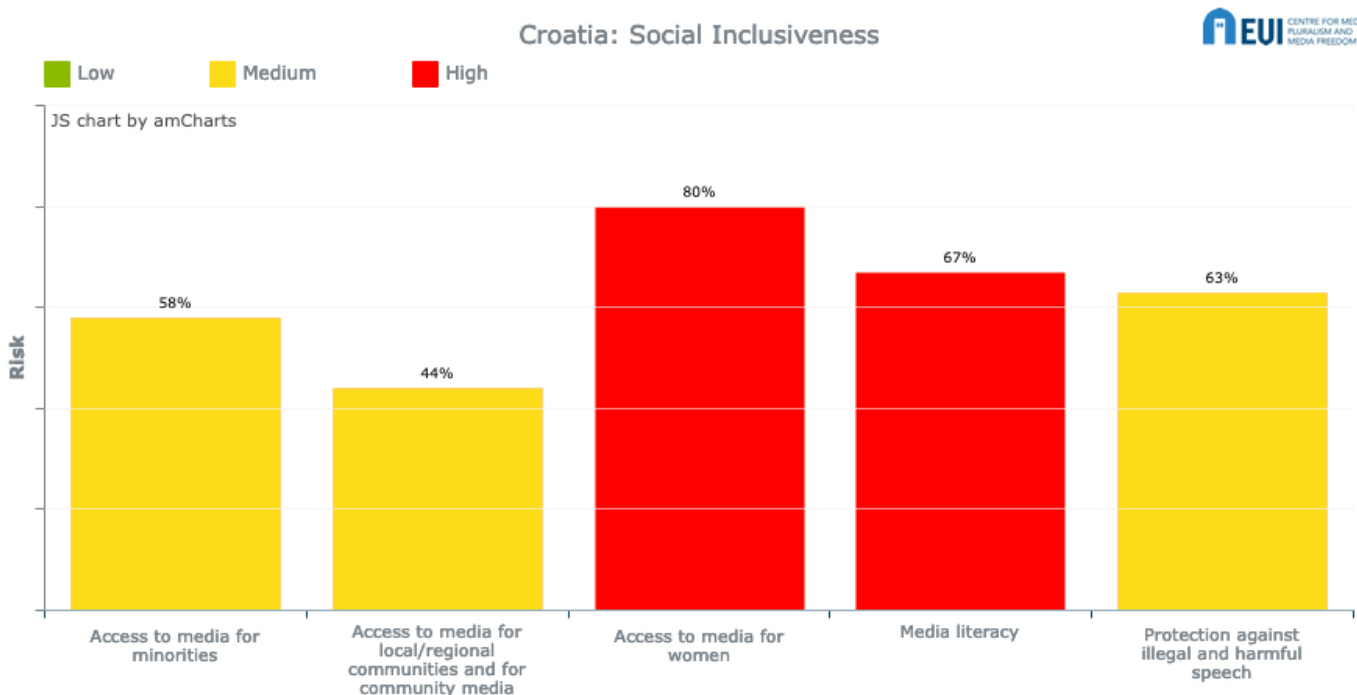
The **State regulation of resources and support to the media sector** scores a medium risk of 54 percent. In 2021, the Council for Electronic Media made a controversial decision on the new concessionaire for the 101 MHz radio frequency. After the license expired for the previous owner (an influential Radio 101 station, especially in the nineties), Top radio d.o.o. was selected as the most favourable bidder. According to available public registries, the owner and director of Top radio d.o.o. is connected to 27 business entities, including informative agencies and other radio stations. This opened the question of ownership transparency, market concentration, and conflict of interest among Council members. The majority of Council members approved the new frequency owner, while two Council members published dissenting opinions. Professional associations voiced their disapproval publicly and in written letters to national and European institutions. There are few regular direct subsidies to media outlets. The Council for Electronic Media is in charge of the Fund for the Promotion of Pluralism and Diversity, based on the Electronic Media Act (OG 111/21). The 3% of the PSM license fee is allocated to the Fund based on the Croatian Radio-television Act (OG 137/10). The Fund finances the production and broadcasting of audio-visual, radio, and online content. In addition, some local governments earmark direct media subsidies in their annual budgets for local media. Article 38 of the Electronic Media Act (OG 111/21) states that state bodies and legal entities owned by the Republic of Croatia are required to spend 15% of their annual budget for the promotion of their services or activities on advertising in audio-visual or radio programs of regional and local television and/or radio broadcasters and/or electronic media. Rules on the distribution of state advertising to media outlets are unclear. State administration bodies and legal entities fulfill their legal obligation by informing the

Electronic Media Council about placed advertising by 31 March of each calendar year.

The **Independence of PSM governance and funding** indicator scores a high risk of 67 percent. With a simple majority of votes, the Parliament elects the Director-General for a five-year mandate (a procedure which, according to the previous iteration of the Law, required a 2/3 parliamentary majority). Four out of five members of the Supervisory Committee are appointed by the Croatian Parliament. The former PSM Director General spent part of 2021 imprisoned on charges of influence peddling and corruption while holding the PSM Director General position. During his term, HRT became infamous for filing SLAPP lawsuits against its employees who also hold functions in the Croatian Journalists' Association. The new PSM Director-General was confirmed by a thin simple majority in the Parliament. The PSM has dual financing from the license fee and advertising. Article 35 of the Croatian Radio-television Act (OG 137/10) determines the license fee at 1,5% of the average net salary in Croatia based on the statistical indicators of the previous year.

3.4. Social Inclusiveness (62% - 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 illegal and harmful speech.



The Social Inclusiveness area scores an overall medium risk of 62 percent. The Access to media for minorities, Access to media for local/regional communities and community media, and Media literacy indicators remain the same as in 2020, scoring 58, 44, and 67 percent respectively. The Access to media for women and the Protection against illegal and harmful speech saw some fluctuation: from 86 to 80 percent and from 56 to 63 percent respectively.

The **Access to media for minorities** indicator scores a 58 percent risk. A legally guaranteed minority right is the right to access the media and public information services in a minority language and script. The Croatian Radio-Television Act (OG 137/10 and 76/12) obliges the Croatian Radio-Television (HRT) to

produce and/or broadcast programs dedicated to informing persons belonging to national minorities in the Republic of Croatia. In practice, twenty-two national minorities recognized by the Constitution are entitled to two one-hour shows on public television and one broadcast on public service radio. Most members of the Group of experts agree with the assessment that most minorities do not have adequate access, or that it is not proportional to the size of their community. The national news is not available in any minority language. Inclusion of people with disabilities in the media is sporadic and usually reserved for specialised TV, or radio, shows. Subtitles, signing, and sound descriptions are available only on an irregular basis, or in the least popular scheduling windows. Sound and audio descriptions are available for blind people in PMS or private TV channels on an irregular basis.

The **Access to media for local/regional communities and community media** scores a medium risk of 44 percent. The Council for Electronic Media grants concessions to local and regional communities based on Article 77 of the Electronic Media Act (OG 11/21), Electronic Communications Act (Article 12, OG 72/17), and the Concessions Act (Article 8, OG 69/17). It supports them through the Fund for the Promotion of Pluralism and Diversity. The Fund stimulates the production and broadcasting of audio-visual and radio programs of television and/or radio broadcasters at local and regional levels (Article 71 Para. 1 of the Electronic Media Act). However, these media are usually granted less than 50 percent of requested funds, based on the most recent data (Council for Electronic Media, 2021). In 2021, the Croatian Journalists' Association (HND) and the Croatian Journalists' Union (SNH) organised a campaign to warn about the increasing dependence of local media on subsidies from the local and municipal levels. These types of funding agreements are usually funded through non-transparent 'advertising' transactions which severely damage their independence and turn them into mouthpieces of local politicians and businessmen.

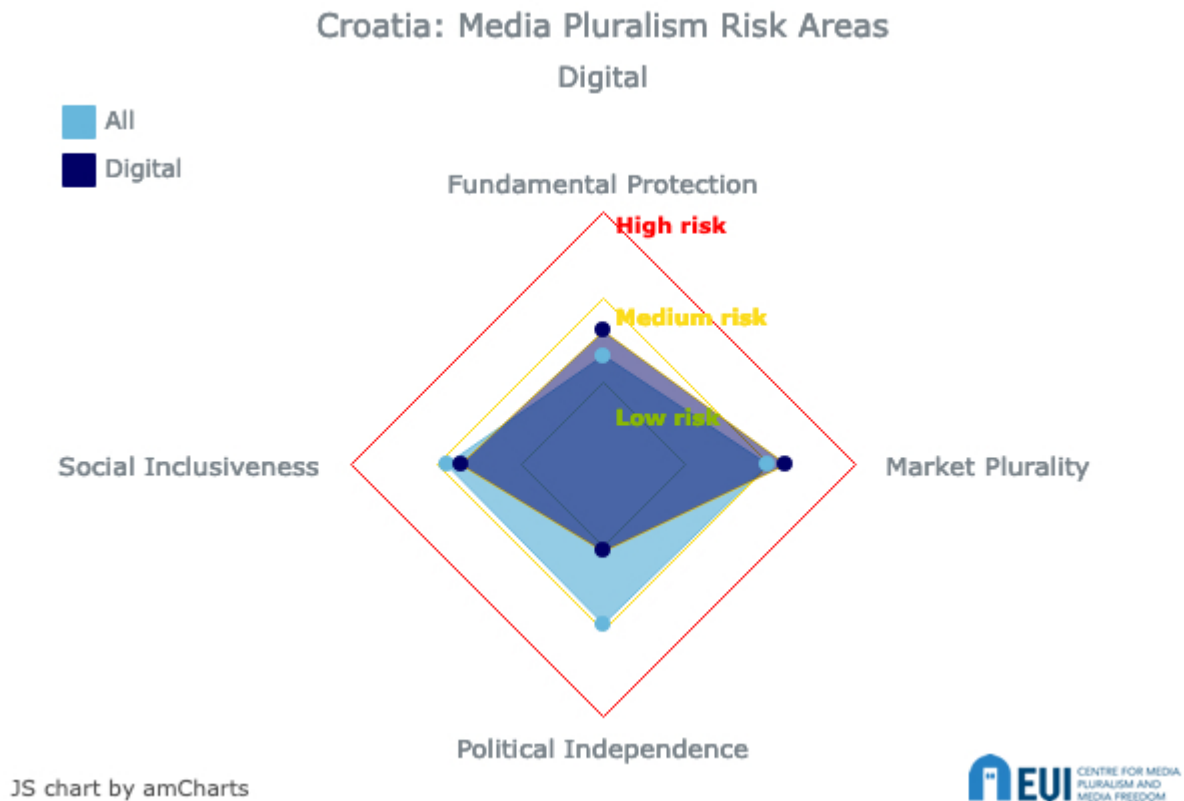
The **Access to media for women** indicator scores a high risk of 80 percent. The gender equality principle has been included in a series of legislative, strategic, and other documents dealing, inter alia, with media. However, the PSM does not have a comprehensive gender equality policy. Neither the Agreement between the Government of the Republic of Croatia and the Croatian Radio and Television for the period 2011-2017 nor for the period 2018-2022 contain a provision on gender equality promotion as a mission or a value promoted in the programs of PMS. Women are underrepresented at the management and executive level of the PSM, as well as at the executive level of private TV companies. In the annual Ombudswoman for gender equality report (2021), the most persistent reported media trend is the objectivization of women's bodies, evaluating women based on their physical appearance both in advertising content and in media personalities, persons from the private sector, politics or sport. While some media try to improve their reporting styles, others (including the public service broadcaster) show a basic misunderstanding of what gender stereotypes are, as well as a lack of effort and will to become more educated or to change their reporting practices. The group of experts agrees that male experts are evidently and systematically more often invited by media to comment on political and other relevant matters and events than female experts.

The **Media literacy** indicator scores a high risk of 67 percent. 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 has been active in developing materials for the parents, teachers, and children on media literacy. The Agency developed Recommendations for children's protection and safe use of electronic media and started a portal promoting media literacy. However, there is no overarching media strategy or policy at the national level aiming to develop media literacy. There is a need to ensure broader implementation of media literacy in elementary and high school education through adequate education and training for teachers. Media and digital literacy are mentioned in the 2030 National Development Strategy (Croatian Parliament, 2021) and the Recovery and Resilience Plan 2021-2026 (Government of the Republic

of Croatia, 2021). However, the Ministry of Culture and Media, while openly acknowledging the importance of media literacy, has not specified or created any strategies that would provide measurable outcomes and benchmarks to reach these proclaimed goals.

The **Protection against illegal and harmful speech** indicator scores a medium risk of 63 percent.^[9] Disinformation is frequent in the country, especially related to the COVID-19 emergency. It is a major source of mobilisation for anti-vaccination and anti-mask protests and rallies. Disinformation is mostly spread over social media and messaging applications. The existing legal framework contains a rather general article 15 in the Electronic Media Act (OG 111/21) targeting false information. However, social media and messengers are not covered by any law or policy. The fact-checking organisation Faktograf regularly publishes debunking information related to the main sources of disinformation. The impact of their activities is limited. Since February 2020 and until December 2021, Faktograf reported 40 violent and death threats for exposing disinformation. Article 14, paragraph 2 of the Electronic Media Act (OG 111/21) states that incitement, or spreading, of hate speech, or discrimination, is not allowed. In Article 94, paragraph 3 the Act introduced the responsibility of online news portals (i.e. electronic publications) for user comments unless users are properly registered and warned of using hate speech. Hate speech is also regulated by the Criminal Code which in Article 325 regulates public incitement to violence and hatred.

4. Pluralism in the online environment: assessment of the risks



The **Fundamental Protection** area in the online environment scores a medium risk of 53 percent. Online platforms are generally cooperative with government requests by local law and corporate Terms of Service. Between January and June 2021, Facebook restricted access in Croatia to one item for allegedly inciting hatred as part of the EU Hate Speech Test under the 2016 EU Code of Conduct on Countering Illegal Hate Speech Online. Facebook also restricted access to seven items for violating Article 325 of the Croatian Criminal Code (OG 125/11). The company launched an advertising campaign in Croatia to educate its users on how it uses fact-checking organisations to combat disinformation (Facebook, 2021). Facebook directly cooperates with Faktograf. In Search, Google introduced a comprehensive experience for COVID-19 that provides easy access to information from health authorities alongside new data and visualisations. When people looked up information for COVID-19 vaccines, the search engine surfaced a list of authorised vaccines in their location, as well as information on each approved vaccine. The problem with these initiatives and reports is that they are mostly self-initiated and/or self-reported, not conducted by independent bodies. There is a strong indication that disinformation is widely spreading in different channels, especially applications such as Viber and WhatsApp, as reported by Faktograf.

On 11 December 2021, Faktograf received physical violence and death threats after a well-known businessman directed his followers on social media to set up a joint fund to sue the platform (European Centre for Press and Media Freedom, 2022). The intimidation started after an entrepreneur posted on his Facebook page, which has 40,000 followers, a pledge to launch a criminal lawsuit against it for allegedly “censoring” his posts. He even suggested that people set up a fund to pay the legal costs of lawsuits. After the post, Faktograf received numerous threatening messages on Facebook and via email, including death threats against their staff. The most serious threats were reported to the police. On 14 December, the platform reported that its website was under DDoS attacks. The HND and SNH condemned the attacks. There have been other well-documented online threats and harassment cases in 2021 (European Centre for Press and Media Freedom, 2022). The GDPR Implementation Act (42/18) contains no specific provisions

about the legal monitoring of journalists by law enforcement authorities. Media specific legislation and the Act on the protection of natural persons about processing and exchange of personal data for the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties (68/18) contain no such provisions.

The **Market Plurality** area in the online environment scores a high risk of 72 percent. The national legislation in the Media Act (OG 54/04) and the Electronic Media Act (OG 111/21) contains no provisions requiring the disclosure of the ultimate owners of digital-native news media. The market share of the top 4 online news media is 50 per cent^[NOTA_1086] The audience share of the top 4 online news media is 83 per cent^[NOTA_1087] Internet users prefer to access news directly on media websites (43.3%), social media (42.9%), searching the media brand (42.5%) or searching particular news through search engines (27.3%) (Vozab and Peruško, 2021). There is no data on the audience concentration of the top 4 online players (news media and intermediaries included). According to the last available data, Google and Facebook captured 76,3 per cent of the digital advertising market in Croatia in 2018 (Bilić, Prug and Žitko, 2021). In principle, competition law applies to all markets which are determined according to the Regulation on Determining Relevant Markets (OG 9/11) and the Market Competition Protection Act (OG 79/09; 80/13). There are no media-specific laws that would apply to the advertising market. There is no reliable data on the revenues of digital-native news in 2021. There are no official statistics or monitoring mechanisms that specify the difference between native news, online traditional news media and online platforms. Advertising data is usually compiled under the 'internet advertising' category by the industry association, while 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 7 per cent between 2021 and 2020 (HURA, 2022). While competing with online platforms for advertising revenue, many news portals in Croatia have introduced paywalls in 2021. Measures that would apply to the protection of journalistic work in online new media are non-existent and largely left to self-regulation which has already proven to be highly ineffective for traditional print and electronic media.

The **Political Independence** area in the online environment scores a medium risk of 34 percent. Digital audiences are segmented and the digital space is showing signs of political polarisation (i.e. left-wing vs. right-wing) (Vozab and Peruško, 2021). Digital media are sometimes used for the mobilization of citizens for political reasons (e.g. voting mobilization in referendum initiatives). The State Electoral Commission does not consider social media as media, in line with the way media are defined in the Media Act, and asks for social media costs of political campaigns to be reported separately from media advertising costs. There has been some CSO advocacy to increase the transparency of political advertising on online platforms during electoral campaigns since many parties and candidates do not fill the forms correctly. For instance, they do not state each social network separately but, instead, merge them into a single sum. Not all candidates/parties are equally meticulous in filling out forms and submitting accurate data. Social media costs that a PR agency representing a specific party pays from their lump sum budget is, oftentimes, not reported at all. The forms themselves could be made more specific and clear to reduce ambiguity. The Croatian Personal Data Protection Agency occasionally publishes relevant materials to educate stakeholders or to interpret relevant EU regulations. In practice, it only reacts to active cases of complaints. There is no detectable, active monitoring and acting upon violations of GDPR, especially in the electoral context.

The **Social Inclusiveness** area in the online environment scores a medium risk of 56 percent.

Disinformation is widely spread in the country, especially related to the COVID-19 emergency. It is a major source of mobilisation for anti-vaccination and anti-mask protests and rallies. The fact-checking organisation Faktograf regularly publishes debunking information about the main sources of disinformation. Faktograf is a member of Facebook's Fact-Checking group. Faktograf started in 2015 as a joint project of the Croatian journalists' association and the civil society organisation GONG. In 2018, GONG was the main publisher, and in November 2021, it became an independent organisation founded by the members of its editorial board. Their main activity is fighting disinformation in public spaces. Since February 2020 and until December 2021, Faktograf reported 40 violent and death threats to the police. In December 2021, an entrepreneur called his Facebook followers to start lawsuits against Faktograf due to a supposed breach of his freedom of speech. Previously, Faktograf reported and exposed his posts for spreading disinformation. The existing legal framework contains a rather general article in the Electronic Media Act (OG 111/21) targeting false information. Article 15 states that all electronic media are obligated to publish truthful information and respect human rights and fundamental freedoms. However, the law extends only to radio, television and news portals (i.e. electronic publications). Social media and messaging applications, which are the main sources of disinformation, are not covered by any law or policy.

Article 14, paragraph 2 of the Electronic Media Act (OG 111/21) states that incitement, or spreading, of hate speech or discrimination based on racial or ethnic belonging, skin colour, gender, language, religion, political or other beliefs, national or social origin, economic status, union membership, education, social status, marital or family status, age, health condition, disability, genetic heritage, gender identity, sexual orientation, antisemitism, xenophobia, ideas of fascist, nationalist, communist and other totalitarian regimes are not allowed. This relates to what the Act defines as electronic publications or edited news portals. In Article 94, paragraph 3 responsibility of online news portals for user comments is introduced, unless users are properly registered and warned of using hate speech. Hate speech is also regulated by the Criminal Code, which in Article 325 regulates public incitement to violence and hatred based on racial, religious, national or ethnic identity, origin, the colour of skin, gender, sexual orientation, disability, etc. Regulation is ineffective and there is no regulatory framework in place to tackle hate speech on social media.

5. Conclusions

Croatia scores medium risk in all four domains in 2021: Fundamental Protection (43 percent), Market Plurality (65 percent), Political Independence (63 percent), and Social Inclusiveness (62 percent). The results are comparable to 2020. The main risks to media pluralism in Croatia have been consistent over the years and have not been dealt with by strategic thinking, or new legislation. Such an approach further deteriorates media pluralism. The new Electronic Media Act (OG 111/21) brought many technical changes, but none targeting detected systemic deficiencies. Tackling all issues detected by the MPM requires coordinated and sustained communication of the Ministry of Culture and Media with all involved actors (i.e. main regulator(s), journalists' association and trade union, industry associations, non-profit media, academic and policy experts, the general public, etc.).

Fundamental Protection:

- The Ministry of Culture and Media should establish and promote continuous communication between the judiciary, journalists' association, and trade union to reduce the number of SLAPPs and the negative effects they have on freedom of expression.
- Defamation, shaming and insult charges should be decriminalised and the Criminal Code (OG 125/11; 144/12 61/15; 101/17; 118/18; 126/19; 84/21) amended.
- The EU anti-SLAPP directive needs to be supported and properly adapted to local conditions.

Market Plurality:

- The Ministry of Culture and Media should open the public debate and introduce taxation of online platforms.
- New tax income should be redistributed to projects promoting media freedom and media pluralism. The Council for Electronic Media and the Croatian Chamber of Commerce need to improve their data collection strategies to allow better understanding and regulation of the digital economy. There is no revenue monitoring of online platforms, native news media, and digital outlets of traditional media as separate entities. There is no official data on the number of employed and unemployed journalists in the country.

Political Independence:

- The Croatian Radio-television Act (OG 137/10; 76/12; 78/16; 46/17; 73/17; 94/18) needs to be amended to change appointment procedures for a key management position. To reduce direct political interference, Director-General and the Management Committee should be approved in the Parliament through a two-thirds majority, instead of a simple majority.
- The Media Act (OG 59/04, 84/11, 81/13) and the Electronic Media Act (OG 111/21) should be amended to include safeguards that guarantee editorial autonomy from political interference when appointing and dismissing editors-in-chief. All media statutes should be made public.

Social Inclusiveness:

- Gender equality should be granted a prominent role in the new Contract between the HRT and the Government (2023-2027).
- The Ministry of Culture and Media should create and implement strategies with measurable outcomes to improve media literacy in the country.
- To tackle disinformation and hate speech, the Electronic Media Act (OG 111/21) should be amended to include social media in Article 15.

6. Notes

- [1] Until March 2022, the Croatian Bureau of Statistics has not yet published the updated statistics on the percentage of minorities in Croatia from the 2021 census.
- [2] Data provided by the Agency for Electronic Media.
- [3] Data provided by the Nielsen agency's SHR measure.
- [4] Data provided by the Agency for Electronic Media.
- [5] Data provided by Ipsos based on daily reach among all radio stations (February – September 2021).
- [6] Data provided by Ipsos based on Average Issue Readership (AIR) among 60 newspapers (January – September 2021).
- [7] Data provided by the Agency for Electronic Media.
- [8] Data provided by Ipsos based on average monthly share of unique visitors (January – November 2021).
- [9] This composite indicator for this year's evaluation contains 9 variables compared to 7 in the previous MPM. For this reason, it is difficult to compare results over time.
- [10] Data provided by the Agency for Electronic Media.
- [11] Data provided by Ipsos based on average monthly share of unique visitors (January – November 2021).

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 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>Responsible for the Political Independence area</i>	<i>Independent Researcher</i>	
<i>Toni</i>	<i>Prug</i>	<i>Responsible for the Market Plurality area</i>	<i>University of Rijeka</i>	

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 that make up the MPM2022. Consulting the point of view of recognized experts was aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as being subjective, and, therefore, to ensure the accuracy of the final results of the MPM. However, it is important to highlight that the final country report does not necessarily reflect the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

First name	Last name	Position	Institution
<i>Hrvoje</i>	<i>Zovko</i>	<i>President</i>	<i>Croatian Journalists' Association</i>
<i>Josip</i>	<i>Popovac</i>	<i>President</i>	<i>Council for Electronic Media</i>
<i>Viktorija</i>	<i>Car</i>	<i>Associate professor</i>	<i>Faculty of Political Science, University of Zagreb</i>
<i>Bojana</i>	<i>Bozanic Ivanovic</i>	<i>President of the Assembly</i>	<i>The Croatian Employer's Association - Newspaper Publishers Association</i>

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