

The Strategy of the Development of the Media System in Serbia (2020-2025) and its Implementation: Knowledge, Opinions, and Proposals from Media Workers

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ASSOCIATION OF MEDIA

Kraljice Natalije 28, Beograd
MB: 1751468
PIB: 103099587
info@asmedi.org



ASOCIJACIJA
ONLAJN
MEDIJA

ASSOCIATION OF
ONLINE MEDIA

Radanska 10, Niš
MB: 28178158
PIB: 109063306



INDEPENDENT JOURNALISTS'
ASSOCIATION OF VOJVODINA

Sutjeska 2, Novi Sad
MB: 08203873
PIB: 102595575
ndnvns@gmail.com



INDEPENDENT JOURNALISTS'
ASSOCIATION OF SERBIA

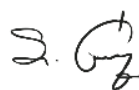
Resavska 28, Beograd
MB: 6975641
PIB: 100065510
nuns@nuns.rs



LOCAL PRESS

Dr Zorana Đinđića 8,
Kragujevac
MB: 17393090
PIB: 101042192
lokpres@eunet.rs

FONDACIJA
SLAVKO
ČURUVIJA
FOUNDATION



SLAVKO ČURUVIJA
FOUNDATION

Kursulina 7, Beograd
MB: 28827113
PIB: 108306573
office@slavkocuruvijafondacija.rs

The Strategy of the Development of the Media System in Serbia (2020-2025) and its Implementation: Knowledge, Opinions, and Proposals from Media Workers

Authors:

Tijana Blagojev

Duško Medić

Nedim Sejdinović

The research was conducted as part of the project “Strengthening Media Capacity for Media Sector Reform in Serbia,” supported by the European Commission (contract no. 2022/441-670), and implemented by the Association of Media, the Association of Online Media (AOM), the Independent Journalists’ Association of Vojvodina (IJAV), the Independent Journalists’ Association of Serbia (IJAS), the Association of Local and Independent Media “Local Press,” and the Slavko Ćuruvija Foundation, from February 2023 to January 2025..

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ЗА ТЕБЕ**

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1

SUMMARY

SUMMARY

The research “Strategy of the Development of Serbia’s Media System (2020–2025) and Its Implementation: Insights, Attitudes, and Proposals from Media Workers” was conducted as part of the project “Strengthening Media Capacities for Media Sector Reform in Serbia,” supported by the European Commission and implemented by several media and journalist associations. The aim was to collect data through questionnaires, focus groups, and in-depth interviews and to analyze them both quantitatively and qualitatively to better understand the attitudes of Serbia’s media workers toward the content of the current Media Strategy and the process of its implementation.

The research was designed to encourage professionals to provide concrete proposals that could enhance media reforms and foster their more active participation in the process.

The results of the research are extensive, complex, and layered, yet the main tendencies are relatively easy to identify. Media workers in Serbia, for the most part, have very low trust in institutions and in the possibility that strategic documents, as well as amendments to laws and by-laws, can significantly alter the media system and practices in the country.

On the other hand, they support and generally highly value the solutions proposed in the Media Strategy, although they doubt that these solutions, as envisioned, can be implemented in reality and achieve their intended effects. They believe that politics entirely dictates the media landscape and that this influence will not be relinquished anytime soon.

Therefore, they consider particularly important those measures from the strategic document that fall within the realm of self-regulation, understood in the broadest sense—activities that can improve the quality of media offerings without the involvement or with minimal involvement of state authorities. This also includes various forms of education.

Not only distrust in institutions but also—linked to this—the prolonged and arduous processes of drafting the Media Strategy, along with its delayed and controversial implementation, have led professionals to rate their knowledge about the document, its harmonization process, and its implementation relatively low.

A clear trend has emerged: those with more relevant knowledge are generally more dissatisfied with the implementation of the strategic document. This is not surprising, given the delays in its implementation and the current expectation (e.g., the start of public discussions on the drafts of the Law on Public Information and Media and the Law on Electronic Media) that some of the key strategic measures will, unfortunately, not be included in the new media legislation.

The research clearly shows that journalist and media associations found themselves in a challenging position throughout the process. On one hand, their task was to participate in drafting important media documents. On the other hand, their active involvement in these processes caused unease among some members

who, as mentioned earlier, have low trust in institutions and institutional processes.

Indeed, if the assumption proves correct that the media laws and their provisions will undermine the Media Strategy, it raises serious questions about the purposefulness of the enormous, multi-year effort invested by the associations during the harmonization process and their subsequent participation in drafting the Law on Public Information and Media.

However, it can be said that the views of media professionals on the solutions within the strategy suggest that it resulted in a relatively solid official government document. If nothing else, it serves as a point of reference for the media community and may fully come to life in the future.

Despite their distrust in institutions and institutional processes, media workers and experts actively participated in the research, proposing numerous solutions and offering ideas that could benefit both associations and decision-makers in the future. Out of a total of 255 media workers, 181 completed the complex and extensive questionnaire. These respondents provided as many as 1,490 comments, elaborating on their views or presenting ideas.

We devoted significant attention to analyzing their comments. We would like to express our gratitude to everyone who participated and contributed to the realization of this research.

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INTRODUCTION

INTRODUCTION

The Strategy of the Development of Public Information in the Republic of Serbia for the Period 2020–2025¹ (hereinafter referred to as the Media Strategy) was adopted at a Serbian Government session in late January and published in the Official Gazette of the Republic of Serbia on February 7, 2020². The aim of this document, as stated, is to establish a functional and sustainable media sector that will support democratic processes in the country, strengthen constitutionally guaranteed media freedoms, and ensure citizens' rights to truthful, timely, credible, and comprehensive information.

This is the second strategic media document adopted in Serbia. To recall, the previous one was approved at a government session in September 2011 and was valid until 2016. State strategies that define the future of the media landscape, its key characteristics, and its environment are generally highly significant documents. They systematically and comprehensively address this dynamic and complex field, considering its interconnection and overlap with numerous other segments of political, social, and legal life. They acknowledge its undeniable societal importance and propose concrete measures for its improvement.

1 <https://www.kultura.gov.rs/tekst/sr/4993/strategija-razvoja-sistema-javnog-informisanja-u-republici-srbiji-za-period-od-2020-do-2025.php>

2 <https://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/vlada/strategija/2011/75/1/reg>

The process of drafting such a strategy is therefore complex, involving the participation of numerous government bodies, institutions, media professionals, and a wide range of civil society organizations.

The reasons for adopting the current Media Strategy are numerous. Not only had the previous strategy expired four years earlier, but in the meantime, the media landscape has faced numerous—both new and persistent—problems, some of which could, at least theoretically, be addressed systematically through strategic planning. Moreover, technological changes during this period have, we might say dramatically, transformed the world of media, their modes of operation, their societal role and significance, and even the very concept of journalism.

A key part of the Media Strategy is the analysis of the current situation: ongoing issues such as a dysfunctional market, political influence, media pluralism, journalist safety and capacities, and more. Additionally, it examines the technological environment, which simultaneously offers new opportunities and presents challenges for media outlets and media professionals.

By general consensus, the Media Strategy was developed through a broad and inclusive, yet prolonged and often confusing process³, which included the participa-

3 <https://europeanwesternbalkans.rs/medijska-strategija-putka-medijskim-slobodama-ili-paravan-pred-eu/>

tion of representatives from relevant state authorities and institutions, independent bodies, universities, media and journalist associations, trade unions, and civil society organizations. Given the belief that this document could contribute to improving the media landscape, representatives of international organizations also participated as observers and provided expert support. The work was closely monitored by EU institutions, as it represented one of the key, clearly defined steps on Serbia's path toward European integration⁴, The Action Plan, which outlines specific activities for implementing the strategic document, was adopted in December 2020. It covers implementation measures for the period from 2020 to 2022, assigning responsibilities not only to state authorities, institutions, and regulators but also to media professionals and civil society organizations.

Thus, in addition to amending laws and by-laws—both those directly concerning media and those that relate to media in any capacity—and defining other measures entrusted to relevant institutions, the Action Plan also includes implementation actions that can be described as self-regulation, understood in the broadest sense of the term. These are measures in which the primary role is played by the media and media workers themselves, in cooperation with segments of civil society.

The role of media professionals in the drafting and implementation of the Media Strategy is multifaceted. Not only were they—

quite logically—key participants in the process of developing the strategy, but their involvement in its implementation is equally crucial, extending beyond what might be called the domain of self-regulation.

Through their inputs, knowledge, perspectives, and experiences, media professionals can contribute to improving the quality of the document, ensuring it aligns more closely with media practices and that its solutions are in accordance with the public interest and the fundamental principles of the profession. Moreover, they can play a role in encouraging and overseeing whether relevant state authorities, institutions, and regulators are implementing the prescribed measures effectively and appropriately. This oversight also involves activating citizens in the process. With the help of the media, citizens should understand that a well-regulated media landscape benefits not only the media community but, more importantly, society as a whole. To fulfill this role, media professionals need to be aware of the importance of systematic regulation of the media sector, understand the processes and significance of specific solutions, and recognize how these contribute to both their own position and that of the media they work for or collaborate with. Additionally, they must see how these measures advance higher levels of media freedom and professionalism. Their role becomes even more significant when numerous challenges in implementing the document arise, as our research unfortunately confirmed.

The goal of the research was to, through data collection, analysis of insights, and the attitudes of media professionals, un-

4 <https://www.kultura.gov.rs/tekst/sr/5745/akcioni-plan-za-sprovodjenje-strategije-razvoja-sistema-javnog-informisanja-u-republici-srbiji-za-period-2020-2025-godina.php>

derstand their relationship with the Media Strategy, the solutions proposed in this document, and its implementation via the Action Plan. We sought answers to questions about the extent to which the document's importance is recognized, the expectations, and the attitudes of media professionals regarding the existing and potential impacts on their position, the media outlets they work for, the overall media landscape, and the realization of citizens' rights to quality information. These rights enable citizens to make informed decisions. We also explored respondents' views on the challenges and obstacles in implementing the document, their suggestions for improving the process, and proposals for the next Media Strategy, which should define the media landscape from 2026 to 2030. Work on this new document should commence next year, but it is uncertain whether this will happen. This uncertainty arises not only due to the chronic delays characterizing the drafting and implementation of strategic documents but also because—according to media professionals and experts—the current document, three and a half years after its adoption, has yet to make a significant impact on media realities. Meanwhile, new technological advancements continue to reshape the world of media and the role of media in society.

Methodological Approach

Until now, there have been no comprehensive analyses examining the insights and attitudes of media professionals regarding strategic documents addressing the media sector, their implementation, and their consequences. Like any other research on

Serbia's media landscape, this study faced a significant challenge, highlighted in the Media Strategy itself—the lack of precise data on the number and configuration of media professionals. When it comes to the number of media outlets, despite the existence of the Media Register⁵, we do not have accurate data on how many media outlets or public information platforms are currently active in the country.

Therefore, we designed the analysis as an exploratory study, which is suitable when the topic or object of research is relatively new and unfamiliar, and when the level of knowledge and understanding among respondents cannot be assumed. The sample should be considered a convenience (non-random) sample. While it is not representative of the entire population of journalists and media workers in Serbia, it nonetheless provides valuable insights into their attitudes due to the diversity of respondents who participated.

The research employed a combination of quantitative and qualitative analysis. The quantitative component facilitates the identification of patterns and trends, enabling subsequent qualitative analysis, generalization, and comparison. The qualitative component provides a richer and more nuanced understanding of the perceptions, experiences, and expectations of media professionals and other stakeholders involved in media reform processes and the implementation of the Media Strategy. We believe that this approach allowed for both a comprehensive and in-depth examination

5 Media register - <https://apr.gov.rs/%D1%80%D0%B5%D0%B3%D0%B8%D1%81%D1%82%D1%80%D0%B8/%D0%BC%D0%B5%D0%B4%D0%B8%D1%98%D0%B8.1180.html>

tributing to the comprehensiveness and credibility of the research findings.

The survey⁶ contained 49 questions, which in the introduction referred to basic data (questions about the respondent's gender, membership in a professional organization, type of employment contract, type of media in which he works or with which he cooperates, as well as the affiliation of that media to a certain association). Other questions, following the logic of the Media Strategy, were distributed in the following areas: general knowledge about the Media Strategy and its implementation, labor and professional rights, media market, institutions, pluralistic media and media literacy. A combination of open and closed questions with a Likert scale was used⁷. In addition to "checking" the offered answers, the respondents had the opportunity to, optionally, leave a comment under each closed question, in order to further clarify the answer or state a specific position regarding the topic/question. Certain questions were open-ended, i.e. the expected answer was in the form of presenting a position. The comments proved to be extremely useful for contextualizing the answers, especially in the process of making recommendations, which are a combination of the results of the analysis and the sugges-

tions of the participants. We consider recommendations to be an extremely important part of our research, especially in cases where there is a problem or proposal that is not recognized, at least not sufficiently, in the existing document. Of course, the Media Strategy and the accompanying Action Plan approach the topics that we covered in the survey in much more detail and complexity, but we tried and, we hope, succeeded in recognizing the most important segments of them and through the process we get to the views of respondents about them, and to spot potential ambiguities, agreement or disagreement.

With the help of the Zoom application, as part of the research, two focus groups were conducted at the end of August and the beginning of September. With mutual and consultation with media experts, we specified the focus groups on two important areas that will certainly be a big challenge for future media planning. One concerned the position of local and regional media in the context of media reforms, while on the other we addressed the spread of misinformation and found possible, adequate responses of the state, institutions, associations, professional media and journalists to this phenomenon, which is the subject of serious and fundamental, recent global debates.

There is no need for an elaborate explanation as to why the topic of local and regional media has been chosen for further analysis. The state of local and regional media serves as an indicator of the overall condition of public information, as well as a measure of a country's overall democratic potential. Local and regional media

⁶ You can view the detailed results and quantitative analysis at the following link: <https://lookerstudio.google.com/s/rBjgZZ-Ko7Y4>

⁷ The Likert summation scale is one of the methods for examining attitudes based on the dominant response model, in order to determine the degree of agreement or disagreement with a specific statement. In our research, the Likert scale questions have 5 levels: from complete agreement to complete disagreement with a given statement/question in the questionnaire. For more information on the scale and research, we recommend the following useful sources: "Research tools", "Methods and techniques of social-psychological research"

cover topics that are invaluable to citizens and local communities but are naturally underrepresented in nationally covered media. They are both indicators and emissaries of local specificities, contributing to the richness of the community.

In the process of media reforms, local and regional media, along with the journalists working within them, find themselves in a particularly difficult position. The challenges pertain to sustainability, pluralism, editorial independence, and the mechanisms that can ensure these, as well as the security aspects of local information dissemination. This focus group included representatives of local media, who shared their perspectives on their current situation and proposed certain solutions that could help improve their position.

When it comes to the spread of disinformation, this phenomenon is not directly addressed by the current Media Strategy. Considering that this topic is highly relevant on a global level (the use of artificial intelligence being just one example), we found it important to explore the perspectives of domestic experts who participated in the focus group on how a strategic approach to addressing it should be developed. We believe that useful recommendations have also emerged from this focus group.

The in-depth interviews were semi-structured, allowing researchers to obtain answers to prepared, important questions while also enabling the conversation to take a spontaneous turn if needed. This approach aimed to expand perspectives or encourage participants to provide more detailed answers or elaborate on unique viewpoints. Some questions were de-

veloped after conducting surveys, as researchers deemed the responses obtained from the surveys to be very useful for the in-depth interviews. Additionally, the direction of the interviews depended on the type of expertise held by the interviewees.

The research was thus designed as a kind of pulse check of the media community regarding the Media Strategy and its implementation. In fact, it focused on all major issues and challenges facing our media landscape, some of which have found their place in these documents—sometimes adequately, and sometimes insufficiently. The Media Strategy is a comprehensive document, so this research should be viewed as merely a starting point for future studies in specific areas. The team believes that the research findings and their presentation will increase support for the development and reform of Serbia's media system, which will, in turn, strengthen the country's democratic development. Researchers also believe that the results will aid media and journalistic associations in designing more effective and purposeful activities for public advocacy of a broad and high-quality reform of Serbia's media system and the implementation of the Media Strategy. Furthermore, they expect the findings to help decision-makers better understand the impact of specific solutions and measures outlined in the document on media practices.

The sample of respondents

The survey sample includes 52.5% male and 47.5% female respondents. The largest percentage of respondents are not members of any professional association (35.91%), while others are members of IJAS

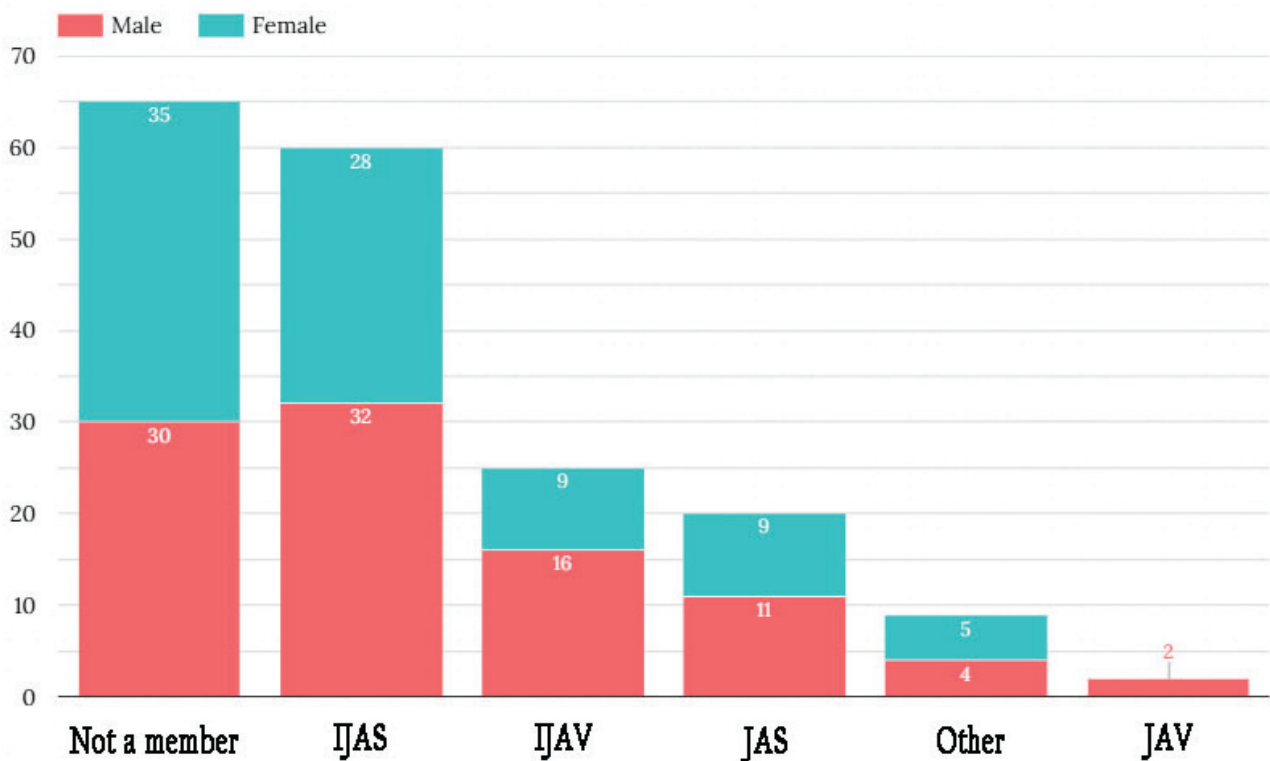


Chart 1: Chart of association membership segregated by gender

(33.15%), IJAV (13.81%), and JAS (11.05%). Additionally, two respondents belong to the Journalists' Association of Vojvodina (JAV). The remaining 4.97% are either members of multiple associations, former members, or belong to smaller groups such as the "Association of Journalists of Serbia in Kosovo," the "Female Journalists Against Violence" association, the "International Association IARJ," and "RAB Serbia" (although the latter is technically a media association). The majority of respondents have permanent employment contracts (59.67%), followed by engagement contracts outside standard employment relationships (20.44%), and 6.63% with fixed-term employment contracts. Notably, although the survey included all possible contract types with employers, 13.26% of respondents selected

the "other" option. Comments explaining this choice suggest that some media workers are not fully aware of their employment status, and consequently, of the rights and obligations arising from it.

The basic data indicate that 181 respondents work, collaborate, or have worked and collaborated with 103 different media outlets or media organizations. Some respondents did not specify the media outlet they work for because they are either retired, currently unemployed, or members of the academic community. Seven participants identified themselves as freelancers. This diversity, we believe, contributes to the quality and comprehensiveness of the research. The largest number of respondents come from public media services

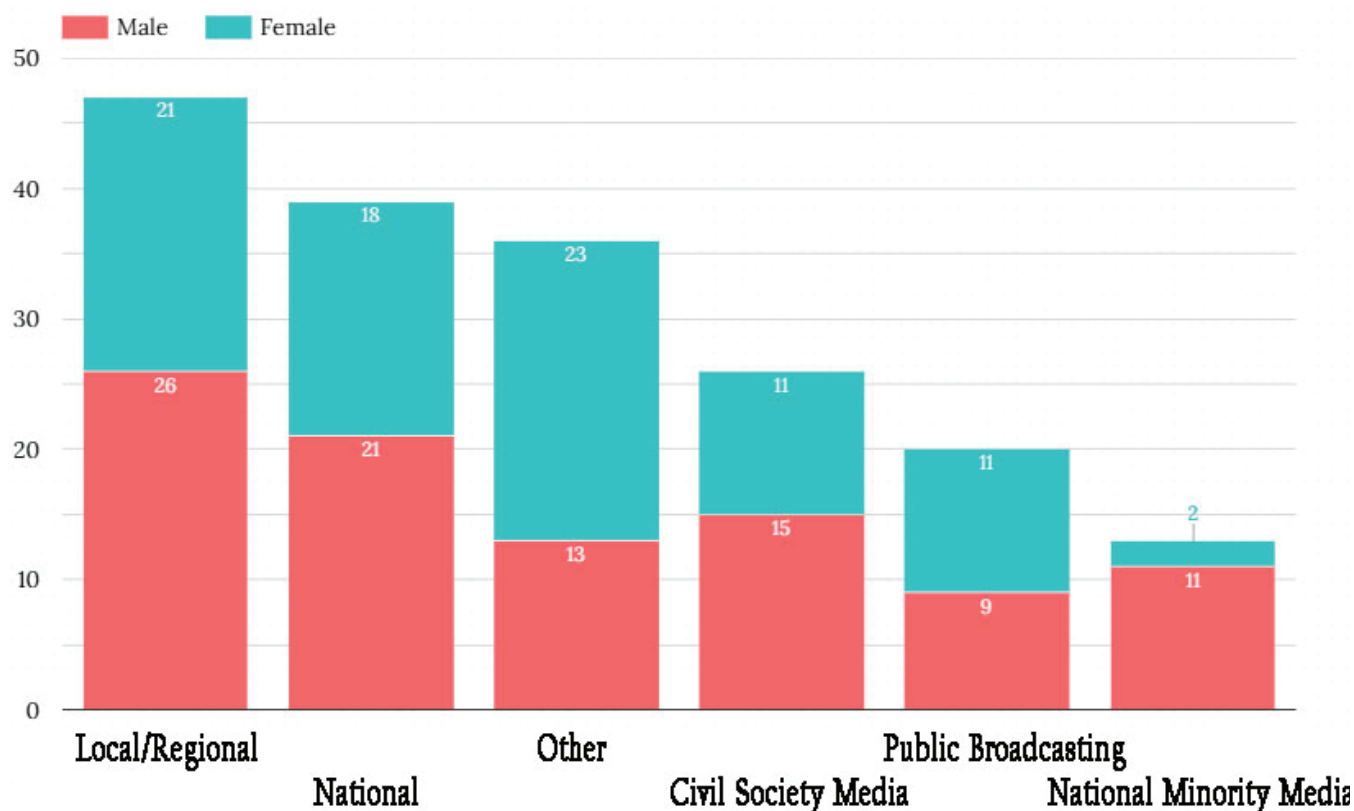


Chart 2: Chart on media type affiliation

(RTV – 12 and RTS – 9), TV N1 (12), and the daily newspaper Danas (10).

We observed that respondents have insufficient information regarding the membership of the media outlets they work for or collaborate with in media associations. As many as 41.44% did not know the answer to the question, “Is your media organization a member of any media association, and if so, which one?” Additionally, 25.41% stated that their media outlets are not members of any association, although this is not accurate in some cases. Regarding the structure of media outlets represented by respondents who provided precise answers about association memberships, 10.5% belong to Local Press, 6.63% to AOM, 5.52% to ASMEDI, and 2.76% to ANEM. Furthermore, 7.73% selected “oth-

er” or mentioned in comments that the media they work for are members of organizations such as AMPEK Kosovo, the EFJ and IFJ Federation of Journalists, EBU, IAB Serbia, the International Non-Journalistic Network, the Network of Local Media South of Belgrade, the Association of Church Broadcasters SPC, or SEENPM.

The majority of respondents work for local or regional media (25.97%), followed by national media (21.55%), civil society media (14.36%), public media services (11.05%), and media in the languages of national minorities (7.18%). A significant portion (19.89%) selected “other” and specified in comments that they work for “cable television,” “foreign media,” “agencies,” “specialized online portals,” “regional portals,” or “private photo agencies.”

3 RESULTS

RESULTS

Regarding the type of media the respondents work for, the majority are involved in online publications (37.02%), followed by television (20.44%), print media (19.89%), and radio stations (6.08%). Those who selected “other” indicated that they work “for both print and online,” or, in some cases, exclusively on “text, photo, and video,” or collaborate with “agencies” or “newsletters.”

Based on the survey responses, it can be concluded that media workers in Serbia are not particularly interested in the Media Strategy, its implementation process, and its potential implications, despite the fact that this document, at least in theory, could impact their profession, employment status, and social position. Comments suggest that their lack of interest is at least partly due to the belief that this document will remain merely a “dead letter on paper.”

More than sixty percent of respondents (61.32%) claimed to be either largely uninformed or only somewhat informed about the content of the Media Strategy and its accompanying Action Plan. On a scale from 1 to 5, where 1 represents complete unawareness and 5 represents complete awareness, the average score was 2.71. The reasons behind the relatively low level of knowledge among media workers regarding this topic vary. Some believe the document fails to attract their attention because it is perceived as insignificant, arguing that it does not fundamentally shape the media landscape but rather serves as a “façade in international relations.” Related to this is the assertion that a strategic act cannot change the overall situation in which “basic principles of free-

dom of speech are violated, and journalism is ridiculed.” It is also noted that the state apparatus responsible for its implementation is viewed as “unreliable and unserious.” Out of 181 respondents, only 38 reported being very well or mostly well-informed about the content of the document and its accompanying action plan.

Some respondents believe that media associations could have done more to present the key content of the documents and the entire process to journalists and other media employees. Others feel that the procedure, adoption, and harmonization of the Media Strategy and its accompanying documents were so prolonged, complicated, and rendered meaningless that they lost interest in following the process and its outcomes. Although the documents can easily be found through a simple search on the websites of relevant state authorities and other platforms, some respondents noted that information about the content of the documents is “not accessible at the local level.” While not significant, there are differences in self-assessed familiarity with the Media Strategy based on the respondents’ association, media affiliation, and type of media they work for. For instance, members of the Journalists’ Association of Serbia (JAS), the Association of Media (ASMEDI), as well as television journalists and those working for national media, rated their thematic knowledge higher compared to other media workers.

Media workers who assessed themselves as very well, mostly well, or somewhat familiar with the content of the Media Strat-

egy (115 respondents) generally believe that the implementation of this document could, at least theoretically, lead to an improvement in the quality of the media landscape (average rating: 3.23). To fully understand this assessment, it is necessary to delve into the accompanying comments. Respondents noted that the solutions presented in the document are good but expressed doubts about whether they will actually be implemented in practice. They believe that the current legal framework is “good but not enforced.” Some feel that it is more important to focus on the application of existing laws than on drafting “papers” that will not be implemented. Journalists and media workers who are members of IJAV, IJAS, ANEM, and the Association of Media (ASMEDI) are more likely than others to believe that the Media Strategy and its implementation can (mostly) lead to improvements in the media landscape and the position of journalists. These groups also show greater satisfaction with the content of the document.

Respondents are dissatisfied with the implementation of measures from the Media

Strategy so far, with an exceptionally low average rating of 1.92 in this category. Interestingly, those who consider themselves more familiar with the content of the Media Strategy and Action Plan tend to rate its implementation even lower. The primary reasons cited for the inadequate implementation include a “lack of political will to carry it out” and the perception that “those in power and financial control clearly do not want the position of journalists outside their complete control to improve or even become tolerable.” Members of JAS, radio journalists, and journalists from local and regional media gave a slightly higher rating to the current implementation of measures from the Media Strategy.

Better-informed respondents, in as many as 93.4% of cases, have not observed any effects of the implementation of the Media Strategy thus far. Those who have (only eight respondents) highlighted outcomes such as the “existence of the Permanent Working Group for the Safety of Journalists,” “self-regulation,” “the media ethics code,” “gradual (though still slow) salary increases,” “analysis of collective agreements

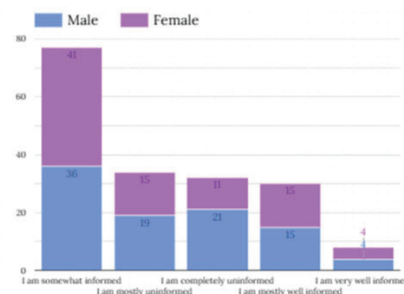
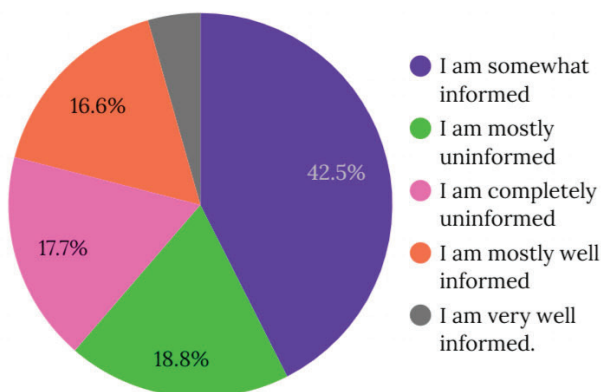
Q8 To what extent are you familiar with the content of the Media Strategy and the accompanying Action Plan?

Average score

2.72

Total number of responses

181



To what extent are you familiar ...	Total number of responses
I am somewhat informed	77
I am mostly uninformed	34
I am completely uninformed	32
I am mostly well informed	30
I am very well informed.	8

Q10 To what extent are you satisfied with the current implementation of measures from the Media Strategy?

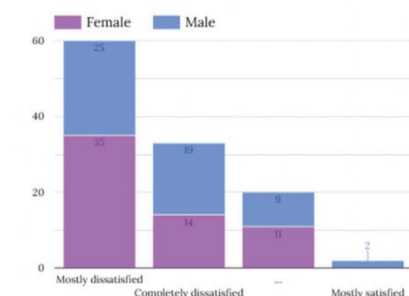
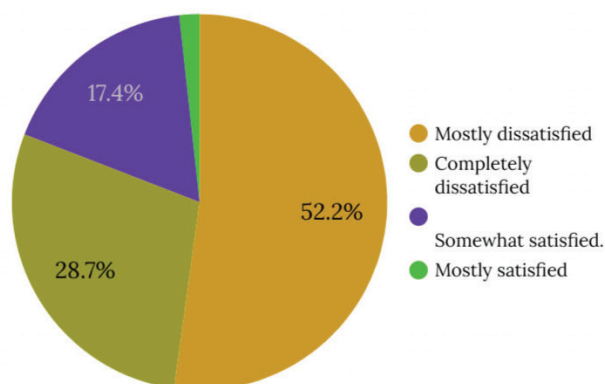
Average score

1.92

Responses

115

* This question was asked only to media professionals who assessed that they are very well, mostly well, or somewhat familiar with the content of the Media Strategy (question 8 - 115 respondents).



To what extent are you satisfied ...	Total number of responses
Mostly dissatisfied	60
Completely dissatisfied	33
Somewhat satisfied	20
Mostly satisfied	2

and trade union activities by JAS,” and “swift responses to attacks on journalists.” However, none of these can be attributed to the implementation of the Media Strategy; for instance, the Permanent Working Group for the Safety of Journalists has been in place since 2016. Comments also include claims that the implementation of the document has had negative effects, such as “current arrests and other attacks on journalists,” “unfair competition,” “copy-paste journalism,” and “the undermining of media funding contests” (which are described as “fundamentally unsuited to Serbia’s media landscape, market conditions, and particularly harmful to local media”). It is unlikely that these are consequences of the current Media Strategy, as its content is entirely at odds with the cited “negative effects.”

In general, respondents believe that media workers in Serbia are very poorly informed about the content, implementation, and potential implications of the Media Strategy, describing them as “mostly uninformed” (average rating: 2.03). Some respondents noted that they would be better informed if the Media Strategy were

What can be done?

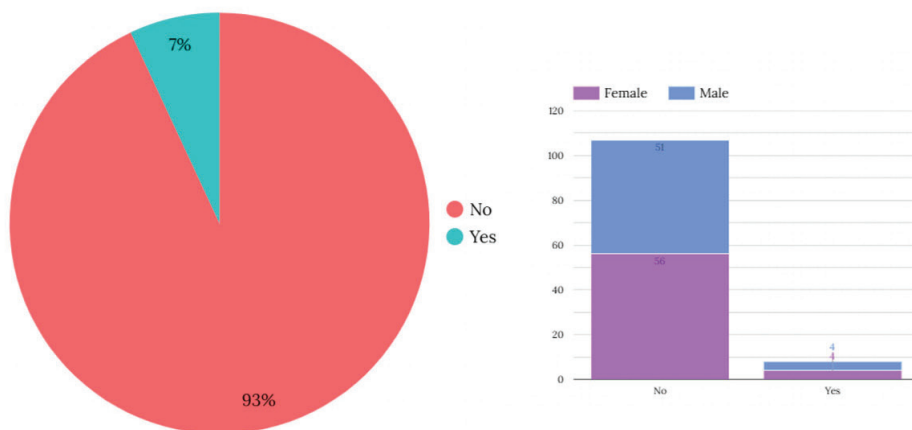
When asked, “What do you think should be done to raise awareness and understanding of the Media Strategy of Serbia 2020-2025 among media workers in Serbia?” the respondents offered different answers, which can be summarized as follows: “Organize more events (workshops, trainings, forums, etc.) for a broader population of media workers and the public, especially in local communities and in collaboration with local media”; “Intensified, specific activities by the competent Ministry, as well as media associations, and direct communication with the media”; “Media workers need to see at least some effects of the strategy first, then they will become more aware of it and better understand it”; “Provide funding for its implementation”; “Freeing the media sphere from political influence”; “The best recommendation is the consistent application of this government strategic document. Its disregard by the authorities undermines the essence and content of the Media Strategy. There is no help if it is consistently violated instead of being consistently applied day by day.”

Q11 Have you noticed any effects of the implementation of the Media Strategy so far?

Responses

115

* This question was asked to media professionals who assessed that they are relatively or well-informed about the content of the Media Strategy (115 respondents).



consistently implemented, as this would help them “understand its purposefulness.” Several respondents mentioned that while there are journalists who are “completely uninformed,” there is also a significant number who are “extremely well-informed.” One respondent suggested that the lack of awareness among media workers is due to the fact that “media outlets aligned with the government, which are more numerous, do not want the public and media workers to be better informed about the Strategy.”

More than 76% of respondents are convinced that Serbia’s Media Strategy has been completely or mostly inadequately presented to media workers in the country. Slightly over 58% of respondents expressed a willingness to pay more attention to the Media Strategy and its implementation in the future.

And Pearson’s correlation coefficient⁸ indicates a negative relationship between

the level of familiarity with the issues surrounding the Media Strategy and satisfaction with its implementation thus far. Simply put, the more respondents (in their opinion) are familiar with the document and its proposed measures, the less satisfied they are with its implementation. On the other hand, the correlation test revealed a positive association between familiarity with the Media Strategy and responses to questions about how much media workers in general know about it and the extent to which the document has been adequately presented to the public.

The experts we spoke with believe that the survey results, which unfortunately indicate that media workers are not sufficiently informed about the content, harmonization processes, adoption, and implementation of the Media Strategy, correlate with the “general distrust in institutions” (Stevan Ristić, President of the ASMEDI Board⁹). Ristić believes that journalists are not sufficiently interested in this process because they

8 The most well-known measure of dependence between two variables is the Pearson correlation coefficient of products and points, or simply the Pearson correlation coefficient. It represents the relationship or interconnection between different phenomena, as represented by the values of two variables. This relationship means that the value of one variable can be predict-

ed with a certain probability based on knowledge of the value of the other.

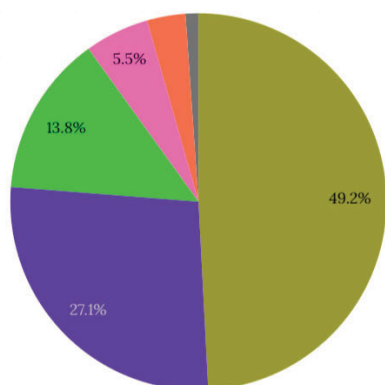
9 An interview with Stevan Ristić, the president of the ASMEDI Board of Directors, was conducted as part of the research implementation.

Q14 To what extent do you believe that the Media Strategy of Serbia 2020-2025 has been adequately presented to media professionals in Serbia?

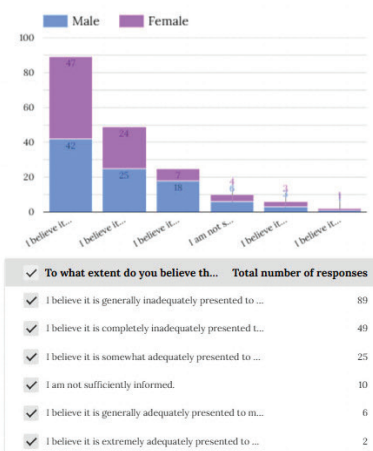
Average score

1.86

Responses
181



- I believe it is generally inadequately presented to media workers in Serbia
- I believe it is completely inadequately presented to media workers in Serbia
- I believe it is somewhat adequately presented to media workers in Serbia.
- I am not sufficiently informed.
- I believe it is generally adequately presented to media workers in Serbia.
- I believe it is extremely adequately presented to media workers in Serbia



To what extent do you believe th...	Total number of responses
I believe it is generally inadequately presented to ...	89
I believe it is completely inadequately presented L...	49
I believe it is somewhat adequately presented to ...	25
I am not sufficiently informed.	10
I believe it is generally adequately presented to m...	6
I believe it is extremely adequately presented to ...	2

think it will not yield any positive results in the current political context.

He also points out that, for this very reason, certain journalistic and media associations have found themselves in a very difficult position throughout this process. On the one hand, their task is to do everything in their power to attempt to systematically change the unfavorable environment for media operations. On the other hand, many of their members believe that the associations’ participation in this process is pointless and even consider negotiations with the authorities—perceived as enemies of the media and media freedoms—to be a form of betrayal. Additionally, there are international organizations exerting pressure on journalistic and media organizations to actively participate in the process, requiring them to expend enormous energy and already limited resources. Media expert Tanja Maksić who actively participated in the drafting of the Media Strategy shares a similar opinion.¹⁰

Media expert Rade Veljanovski¹¹ however, believes that journalists should have done much more to inform themselves. Regardless of the lengthy and complex process of drafting the Strategy, he points out that the document was adopted back in January 2020, and that there is “no excuse for journalists and media workers not being sufficiently informed about it—not just the Strategy but also the accompanying Action Plan, which was adopted in December of the same year.” He notes that journalistic and media associations were very active in the process, but acknowledges that many journalists remained outside of it. “What can be done about that? It comes down to journalistic organizations and associations. It’s not too late now, but I think this should have been done earlier—organizing small seminars, lasting a few days, to explain the main parts of these documents to media workers, including their content, significance, and implications. Every segment of the Strategy is important, but there are parts that are particularly crucial for journalists and media workers, and those

10 An interview with media expert Tanja Maksić was conducted as part of the research implementation.

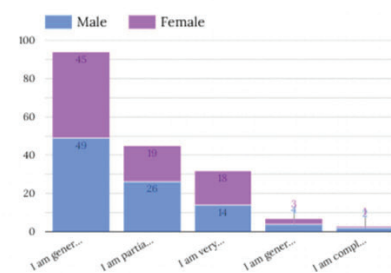
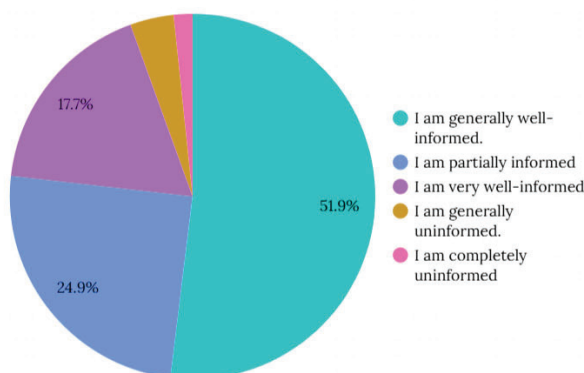
11 An interview with media expert Rade Veljanovski was conducted as part of the research implementation.

Q16 How would you assess your knowledge of your labor rights?

Average score

3.80

Total number of responses
181



How would you assess your knowledge of your labor rights?	Total number of responses
I am generally well-informed.	94
I am partially informed	45
I am very well-informed	32
I am generally uninformed.	7
I am completely uninformed	3

should have been given special attention,” says Veljanovski.

Labor and Professional Rights

The Media Strategy highlights the unfavorable socio-economic position of journalists and media workers in Serbia, many of whom often lack proper employment contracts. Journalists’ salaries are low, sometimes even below the national average, payments are frequently delayed, and a significant number of journalists work overtime. All these factors contribute to the degradation of the profession, placing journalists and media workers in precarious positions, leading many to consider leaving the profession. The combination of low and delayed earnings, job insecurity, work without contracts, or easily terminable contracts creates a form of pressure that fosters self-censorship, undermines independence, diminishes the quality of journalism, and encourages the “tabloidization” of media content.¹²

Despite these observations, media professionals in Serbia assess their knowledge of labor rights as good or mostly good, giving themselves an average rating of 3.8. Over seventy percent of respondents stated that their understanding of this area is either partially good or mostly good. Some pointed out that the issue is not with knowledge or awareness but with the more critical question of “how much of our labor rights we can actually exercise with our employers under current societal circumstances.” Others noted that legal regulations in this area are “changed overnight” or “not applied in practice.” One respondent commented: “I know what my rights are, and I know when they are respected and when they are not.” Respondents working in print media, as well as members of JAS, IJAV, ANEM, and the Association of Media (ASMEDI), believe they are better informed than other respondents.

Respondents rate union organization as a guarantee for protecting journalists’ labor rights significantly lower, with an average score of 2.28. Only slightly over 20%

¹² <https://www.kultura.gov.rs/tekst/sr/4993/strategija-razvoja-sistema-javnog-informisanja-u-republici-srbiji-za-period-od-2020-do-2025.php>

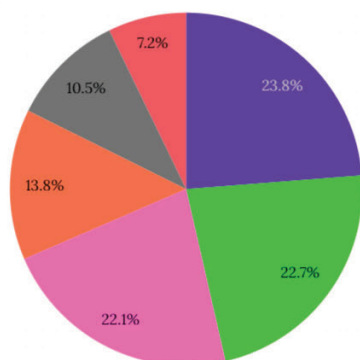
Q19 To what extent, in your opinion, do union activities contribute to the protection of your rights?

Average score

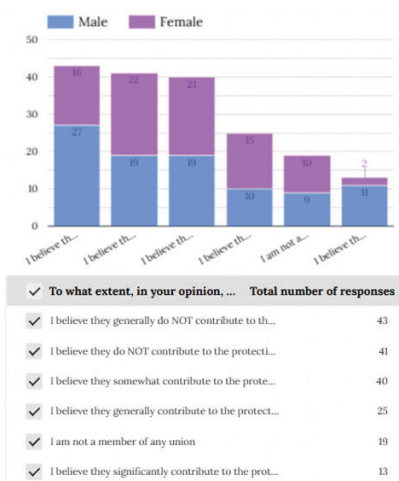
2.28

Responses

181



- I believe they generally do NOT contribute to the protection of journalistic labor and professional rights
- I believe they do NOT contribute to the protection of journalistic labor and professional rights at all
- I believe they somewhat contribute to the protection of journalistic labor and professional rights
- I believe they generally contribute to the protection of journalistic labor and professional rights
- I am not a member of any union
- I believe they significantly contribute to the protection of journalistic labor and professional rights



To what extent, in your opinion, ...	Total number of responses
I believe they generally do NOT contribute to th...	43
I believe they do NOT contribute to the protect...	41
I believe they somewhat contribute to the prote...	40
I believe they generally contribute to the protect...	25
I am not a member of any union	19
I believe they significantly contribute to the prot...	13

(20.99%) of respondents have a positive or relatively positive view of unions, while the majority are more critical. As many as 46% believe that unions do not contribute at all or mostly do not contribute to protecting labor rights. Union roles are rated somewhat higher by media workers affiliated with IJAV and AOM, journalists working in languages of national minorities, employees of public media services, journalists in print media, and those with permanent contracts.

One respondent’s comment, indicative of the issue highlighted in the Media Strategy (namely that better union protection under current circumstances is impossible due to the lack of conditions for social dialogue, weak unions, and the absence of a formal employers’ organization as a negotiating body), states: “Union organization is not a common practice in our profession in Serbia, and it is particularly poorly regarded in privately owned media.”

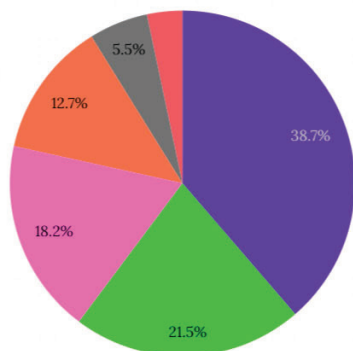
Respondents generally, and in this case as well, rate the measures from the Action Plan related to the education of journalists and other media workers more favorably.

They value the need to organize training sessions for achieving labor and professional rights with an average score of 3.48. Most respondents stated that such training would somewhat contribute to improving their work status (around 31%). Education is seen as a tool for more effectively asserting rights, particularly by women, media workers with permanent contracts, employees of public media services, and television workers. Several comments emphasize that it is “important to empower journalists to fight for themselves, but also for their colleagues.” Online courses are the preferred format for such training. The views of respondents who highly or relatively highly rate education in this area show a significant positive correlation with the views of those who believe that training on defending labor and professional rights would also contribute to greater protection from censorship or self-censorship (average score: 3.23). Some, however, believe that “freedom from censorship or self-censorship” can only occur to a greater extent when “societal circumstances change.”

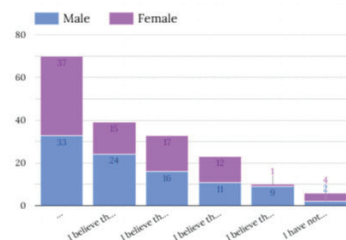
Q20 How would you evaluate, based on your insights, the work of the Permanent Working Group for the Safety of Journalists in terms of improving journalist safety over the past year?

Average score
2.56

Responses
181



- I believe the work of the Permanent Working Group has partially contributed to improvin...
- I believe the work of the Permanent Working Group has generally NOT contributed to improving journalists' safety
- I believe the work of the Permanent Working Group has NOT contributed to improving journalists' safety at all
- I believe the work of the Permanent Working Group has generally contributed to improving journalists' safety
- I believe the work of the Permanent Working Group has significantly contributed to impr...
- I have not heard of the Permanent Working Group for the Safety of Journalists



How would you evaluate, based ...	Total number of responses
✓ I believe the work of the Permanent Working Gr...	70
✓ I believe the work of the Permanent Working Gr...	39
✓ I believe the work of the Permanent Working Gr...	33
✓ I believe the work of the Permanent Working Gr...	23
✓ I believe the work of the Permanent Working Gr...	10
✓ I have not heard of the Permanent Working Gro...	6

Suggestions for Improving Journalist Safety

In the survey, some participants provided specific suggestions they believe could enhance the safety of media workers. They emphasized the importance of enforcing the existing legal framework and imposing stricter penalties on perpetrators. It was also suggested that endangered journalists should have access to free legal protection, regardless of whether they are members of professional associations. Additionally, there were proposals addressing structural institutional issues, with respondents highlighting that greater independence of prosecutors could contribute to better protection of media workers.

The correlation between the targeting of journalists by government representatives and pro-government media and their safety was also noted. One proposed solution is “better cooperation with relevant institutions, greater solidarity among journalists, and a more proactive media approach.” Media workers in Serbia have long held a so-called official status in terms of security. However, some respondents were unaware of this fact and see this status as a potential solution.

One respondent stated: “Raising awareness among journalists is always a good approach. However, I fear that we do not sufficiently

share the issue of journalists’ safety concerns with the public. To improve the situation, we need broader support beyond our own circles, as much depends on the judiciary. We need public support; we need to put the issue of safety on the agenda. I’m afraid we might need to declare a year dedicated to the fight for journalists’ safety, during which journalists would discuss and appear on all programs, from morning to evening shows, every single day for 365 days. Of course, I don’t mean this literally, but I fear that, despite working in the media, we haven’t managed to synchronize and position this issue as important not only for us but primarily for the public.”

Regarding the intertwined issues of safety and overall labor and professional rights, one participant’s view was particularly indicative: “I believe that employers should primarily comply with labor laws, not just the minimally prescribed standards. They should ensure adequate pay, rest, healthcare, and, in certain cases, psychological support for journalists. This could greatly contribute to reducing employees’ stress and making them feel safer and more secure. Above all, it would preserve their dignity.”

One of the measures in the Media Strategy pertains to the work of the Permanent Working Group for the Safety of Journalists, which—according to the document—should be improved, primarily through increased government support for the group’s activities. Respondents rated the work of this tripartite body with an average score of 2.56. Approximately 38% of respondents believe that the group’s work has somewhat contributed to the improved safety of media workers, while about 40% think it has not (either not at all or mostly not). Respondents generally claim to lack sufficient information about the group’s activities (3.31% had not heard of the working group at all), suggesting that it does not adequately promote itself. Some believe that the successful operation of the Permanent Working Group is impossible due to the involvement of institutional representatives who either do not fulfill their duties or are not allies of media freedom. Slightly higher ratings for the group’s work were given by journalists with permanent contracts, journalists working in the languages of national minorities, and media workers affiliated with ANEM.

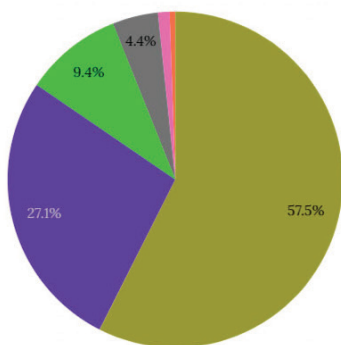
Slightly more than 60% of respondents believe that the measure to raise awareness about journalists and media workers being exposed to sexual harassment, psychological abuse, and other forms of mistreatment can contribute or significantly contribute to safer working conditions. The results of this survey topic also indicate that respondents highly value education, which can be considered a form of self-regulation, in the sense that such activities are separate from state institutions.

The focus group ¹³ dedicated to local and regional media also discussed the labor rights of employees in these outlets, with particular attention to the safety aspects of their work. Extremely weak union organization was noted. Regarding safety, participants pointed out that journalists in smaller communities face greater challenges than those in national media, especially if they report professionally and maintain a critical stance toward authorities and power holders. These journalists are more visible, accessible, and exposed than their counterparts in larger communities, and

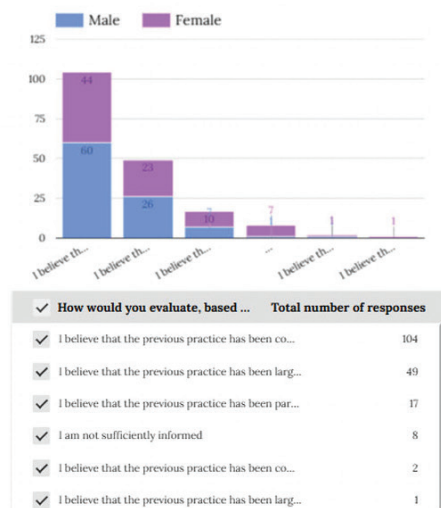
13 A focus group on the sustainability and challenges of local and regional media was held on August 30, 2023. A list of participants can be found in the appendix of this research.

Q24 How would you evaluate, based on your insights, the current practice of project co-financing of media content?

Average score
1.48
Responses
181



- I believe that the previous practice has been completely unsatisfactory
- I believe that the previous practice has been largely unsatisfactory
- ...
- I believe that the previous practice has been partially satisfactory
- I am not sufficiently informed
- I believe that the previous practice has been completely satisfactory
- I believe that the previous practice has been largely satisfactory



How would you evaluate, based...	Total number of responses
I believe that the previous practice has been co...	104
I believe that the previous practice has been larg...	49
I believe that the previous practice has been par...	17
I am not sufficiently informed	8
I believe that the previous practice has been co...	2
I believe that the previous practice has been larg...	1

they also have less public protection in the event of attacks. Additionally, institutions that should be protecting them are often

subject to unquestionable political influence.

Suggestions for Improving Competition-Based Co-Financing

The surveyed participants believe that the system of project co-financing could be improved by introducing: process control, evaluation of completed projects, and punitive measures for those who fail to comply with project requirements. They also suggest that involving citizens more actively in the process, enhancing transparency, ensuring the competence of commission members, and including “independent individuals” in commissions who are not susceptible to political influence would contribute to the system’s improvement. These measures align with the proposals outlined in the Media Strategy document.

Additional suggestions include “scoring based on criteria, public broadcasts of commission sessions, and encouraging more media outlets to apply to ensure pluralism.” Specific proposals include: “Restricting a single media outlet and its affiliated legal entities from receiving as much as 80% of total contest funds, strengthening the mechanism for determining public interest in public information, and incorporating this as part of the contest.”

One participant suggested: “I believe citizens should vote in a referendum on content they feel is lacking in their local community. Based on their interests, themes would be formulated for which media outlets could compete. If there is no interest in the referendum, it could be considered that citizens are not interested in media coverage of important topics, although I believe reality would prove otherwise. (...) Media would compete not only based on the quality of the topic’s treatment but also on the quality of the space they allocate to that topic. Priority would be given to those with a larger audience and who dedicate more prominent space to the

topic. Citizens would evaluate whether they are satisfied with how the topic was handled, and those who misused funds would not be allowed to apply the following year.”

There were also suggestions for project proposals to be submitted anonymously via a unified platform, with applicants only revealed after funding is allocated to a quality project. It was recommended to prohibit applications from media outlets that only update their content during the project’s implementation. Proposals include making media registration more challenging by requiring certain competencies, thus reducing the number of media outlets eligible to participate in the co-financing process.

Some suggest the creation of a working body to assess how much value citizens of Serbia receive from media projects funded through the program. Prosecutorial action against abuses in project co-financing was also emphasized as necessary by one respondent. One of the most comprehensive proposals states: “Improving the system of project co-financing for media content requires a combination of transparency, independence, inclusiveness, and accountability.”

Some participants suggest that projects should be ranked by importance and that media outlets from other areas that are unable to implement projects in the local government territory where they are applying should not be supported, as they lack on-the-ground journalists. More precise legal regulations and their consistent application are also considered necessary by the respondents.

It is considered essential to foster mutual solidarity, both among media workers within specific communities and between media outlets and journalists across the entire country. It was noted that younger journalists exhibit a higher level of self-censorship, especially when they find themselves in “difficult situations,” and that they should have the support of older, more experienced colleagues in such cases. Participants also emphasized that an effective form of self-defense is a strong reaction from the local democratic public, particularly civil society organizations and citizens in general, in cases where the safety of media workers is at risk. According to employees, this response is a better protective mechanism than the Permanent Working Group for the Safety of Journalists, and especially better than judicial authorities.

Participants highlighted that the concept of the Permanent Working Group for the Safety of Journalists and its associated contact points is a good idea, but that this body has limited influence on local circumstances. Some insisted on avoiding the misuse of this protection mechanism, emphasizing that it should be utilized only by media workers whose safety—as specified in the Criminal Code of Serbia—is endangered “in connection with the work they perform.”

Media market

One of the main goals of the Media Strategy is to establish a functional, sustainable, and fair media market free from political influence. The document notes that the state and public authorities undermine the media market through various mechanisms for fi-

nancing privileged media, whether through state aid (competitive co-financing), public procurement, business cooperation agreements between the public sector and media outlets, non-transparent and unclear crediting of publishers’ tax and other obligations to the public sector, as well as other forms of (direct and indirect) financing. While the process of competitive co-financing of public interest in the field of public information is somewhat transparent—basic information about it can be accessed through the Media Register, portals of independent research centers, and (mostly) on government websites—other forms of state funding for the media sector remain entirely invisible to both citizens and researchers. These funding mechanisms are crucial for understanding the media landscape and its dynamics, as well as for taking the first step toward achieving the desired fair and non-discriminatory media market. One of the measures for implementing the Media Strategy is the inclusion of all relevant information about the allocation of state funds to media publishers in the Media Register.

The majority of respondents consider this measure important, emphasizing that greater transparency and accessibility of data in the Media Register would generally contribute to the establishment of a fair media market (the average rating is relatively high: 3.6). As many as 32.6% believe that the measure would significantly help this process, and even those who rate it lower do not seem to think the measure is inherently bad. The main issue here is skepticism about its positive outcomes. A telling response from those who believe this measure will not, or mostly will

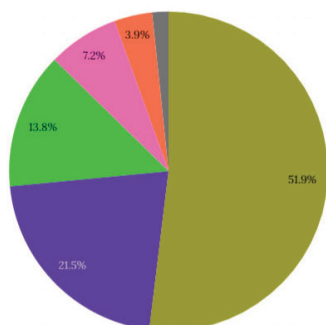
Q28 To what extent do you consider the introduction of tax reliefs or tax credits for local and regional media justified in order to protect local information dissemination?

Average score

3.95

Responses

181



● I believe it is completely justified

● I believe it is largely justified

...

● I believe it is partially justified.

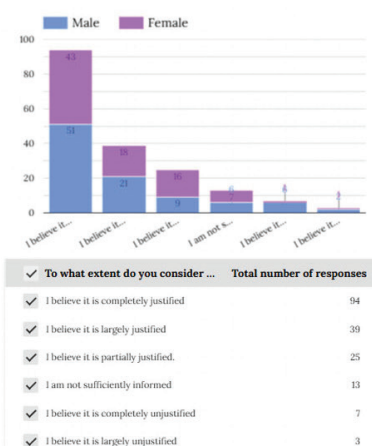
...

● I am not sufficiently informed

● I believe it is completely unjustified

...

● I believe it is largely unjustified



not, contribute to creating a fair market is: “Even greater scandals haven’t shaken the position of those who make the media market an unfair space to operate in. That doesn’t mean I think this data shouldn’t be entered into the register. On the contrary.”

The previous Media Strategy (from 2011) and the laws derived from it introduced two key innovations in the media sphere: the withdrawal of the state from media ownership and the competitive co-financing of public interest in the field of public information. Thus, the state relinquishes its ownership stakes in media outlets but continues to financially invest in media by co-financing essential media content important to citizens, through a transparent and clear procedure and the work of independent expert commissions for project proposal evaluation. Unfortunately, this mechanism has, by general consensus, shown numerous shortcomings. Experts argue that it has largely turned into a form of state support for media outlets aligned with the authorities. The new Media Strategy does not abandon this mechanism but instead envisions a series of well-devel-

oped measures designed to improve it and restore it to its original purpose.

Media workers rated the current practice of competitive co-financing very poorly, with an average score of 1.48. Nearly 85% stated that the practice has been either completely unsatisfactory (almost 58%) or mostly unsatisfactory (around 27%).

In their comments, respondents highlighted the following key issues: the method of selecting competition commissions, the non-transparent process where decisions are made by government authorities rather than the commissions, and the fact that—despite adherence to ethical standards being one of the main prescribed criteria for funding—state aid is awarded to media outlets known for consistently violating the Serbian Journalists’ Code of Ethics¹⁴. It was noted that there are “catastrophic abuses” and “extremely high political influence” in this process. The situation is described as particularly dire at the local level (“In smaller communities, it is known in advance who must receive

14 <https://savetzastampu.rs/dokumenta/kodeks-novinara-srbije/>

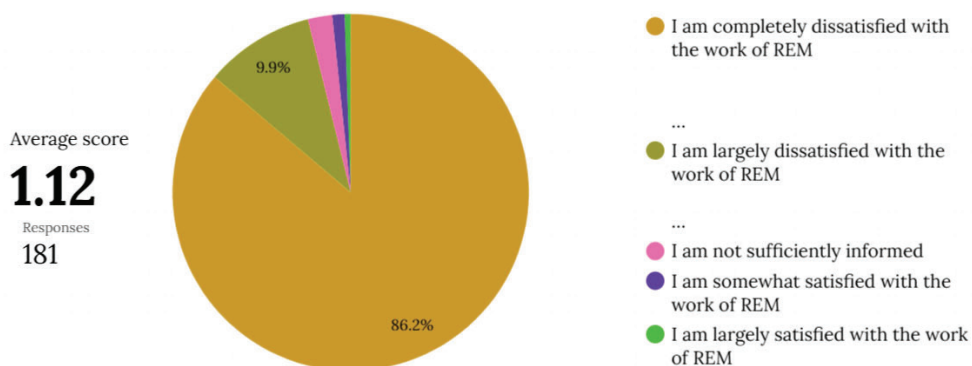
how much, regardless of the quality of the project itself”). Some respondents pointed out that the practice at the national level is somewhat better, or at least was in earlier periods. “The rating would be absolutely negative if the Ministry had not initially demonstrated through a specific example how this system should and must function. Everything that has occurred since has undermined the legislative framework and the intended concept, with small improvements existing only at the national level, although even there the situation is worsening,” one illustrative response noted.

One of the measures outlined in the Strategy aimed at improving the competitive co-financing process is enhancing media capacity for participation (training on designing, writing, and implementing media projects). We asked media workers about their previous experiences with this type of training, given that it had been conducted earlier, primarily through arrangements by professional and other civil society organizations. This measure received a very poor evaluation, with an average score of 1.78. One-third of respondents believe

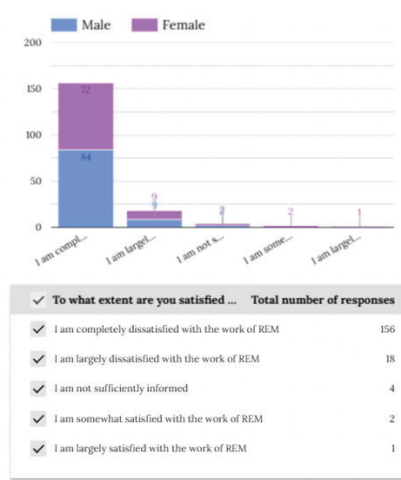
that training in the past did not yield good results regarding competitive co-financing, with the indicative reason being that “the quality of the project is not important in this process; instead, ‘political influence’ dominates.” However, some noted that the skills they gained were useful for other funding opportunities. Half of the respondents rated this measure between 1 and 2, while a much smaller portion agreed that the support somewhat produced good results (18.23%) or mostly agreed that capacity-building project support yielded good results (3.31%).

One of the strategic measures for improving the competitive co-financing process is the possibility of a centralized application system through a unified information platform. This platform would make funded media content accessible to everyone across broader areas than those where the content is distributed. It would enable searches of projects, applications, and decisions and include links to broadcasted or published content. More than 60% of respondents completely agree that competitively co-financed media content

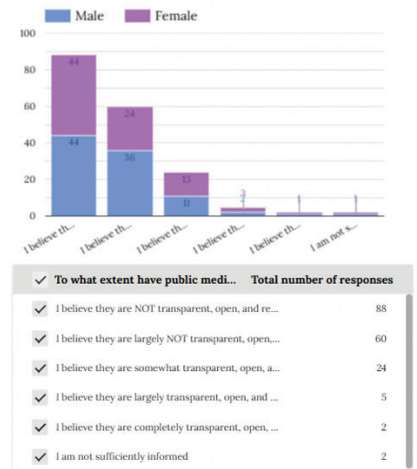
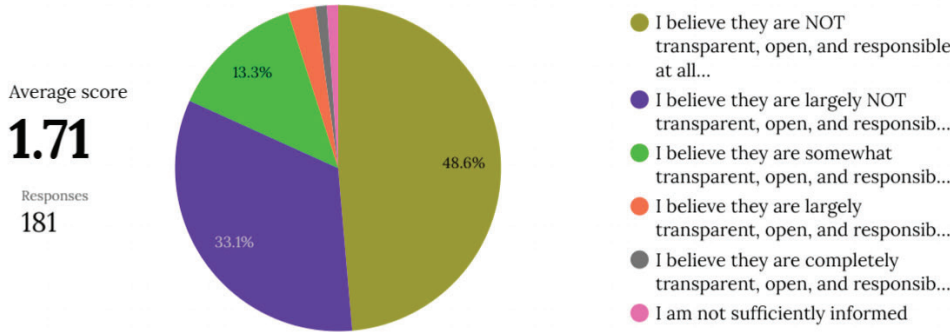
Q29 To what extent are you satisfied with the work of REM (Regulatory Authority for Electronic Media) over the past year, based on your insights?



Average score
1.12
Responses
181



Q32 To what extent have public media services been based on the principles of transparency, openness to citizens, and responsibility over the past year?



should be public, easily accessible, and searchable. The average rating for this measure is high—4.33. Comments highlight that “it would be beneficial for media content supported through competitive co-financing to be publicly accessible and easily searchable,” adding that this would make it “clear which projects received budget funding and whether the project goals were achieved.”

When it comes to potential tax incentives for local and regional media (the Strategy proposes “conducting an economic analysis of the justification for introducing tax incentives or tax credits for local and regional media, with the aim of implementing these through amendments to tax laws”), more than half of the respondents believe that such potential measures would be beneficial for protecting local information dissemination (52%). The average rating for this measure is 3.95. However, some respondents emphasized that it would be crucial to prevent abuses in this process, ensuring that media outlets aligned with the government are not given

privileges, while independent media are discriminated against.

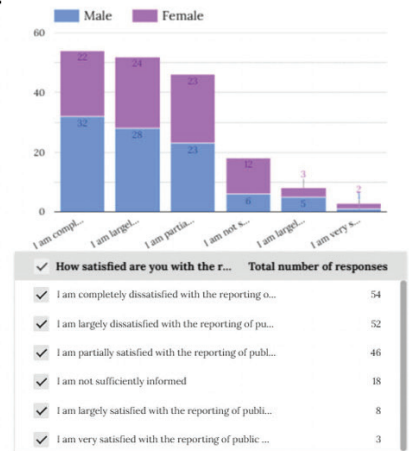
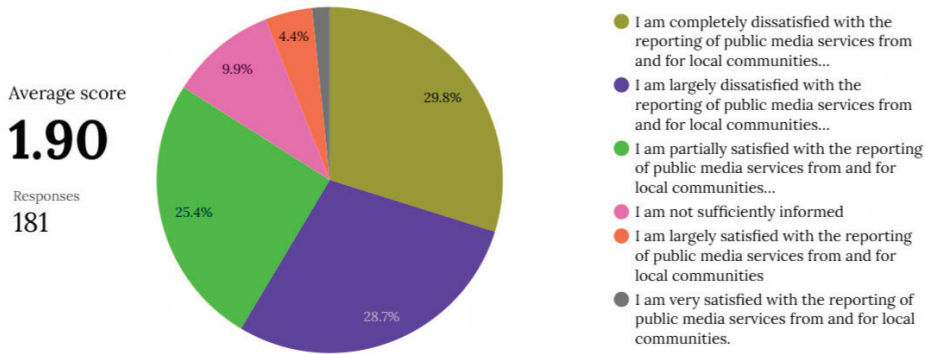
Functional, competent, professional, and transparent institutions

This section of the survey is directly related to the part of the Media Strategy that defines the improvement of institutional roles within the media system. The goal, as stated, is to establish functional, competent, and transparent institutions that possess mechanisms to protect against external pressures and consistently implement public policies and regulations.

In this context, the Regulatory Authority for Electronic Media (REM) and public media services (RTS and RTV) are particularly emphasized as fundamental independent institutions that should promote, guarantee, and practice professional journalism and serve the public interest.

Respondents rated REM very poorly, with as many as 86% expressing complete dissatisfaction with its work. The average rating was 1.12. Only three respondents stated that

Q33 How satisfied are you with the reporting from and for local communities on public media services (RTS and RTV) over the past year?



they were partially or mostly satisfied with this institution’s work. In their comments, media workers used strong language, such as: “Shameful!”, “REM is a completely privatized regime organization,” and “REM in its current composition needs to be disbanded immediately.” Other comments included: “They are responsible for granting national frequencies contrary to regulations and eligibility requirements” and “Currently, it unnecessarily wastes taxpayers’ money, as it does nothing within its jurisdiction except protect media outlets that serve as propaganda tools for those in power.” Poor ratings for REM were consistent across respondents, regardless of their association affiliations or the media outlets they work for.

The measures outlined in the Strategy include increasing the transparency of REM’s operations, which would involve introducing public consultations, establishing a citizen call center, and developing an efficient and interactive website. Respondents believe this measure could somewhat improve REM’s performance, giving it an average score of 3.4. However, there is a noticeable discrepancy between the perceived quality

of the measure itself and the likelihood of its practical implementation and tangible results. Comments frequently highlight that the main issue with this institution, “as with other bodies and institutions,” lies in the composition of its governing body, in this case, the Council. It is emphasized that “there can be no effective public oversight of any state institution without an independent judiciary.” “A call center makes no sense if there is no functioning institution,” one respondent stated. Another commented: “REM sessions must be broadcast in real-time, and Council members must be obligated to provide public responses to every question or objection meaningfully raised by any citizen. Questions REM cannot answer, along with explanations for the lack of answers, should also be published. It’s important that everything is recorded,” one respondent suggested.

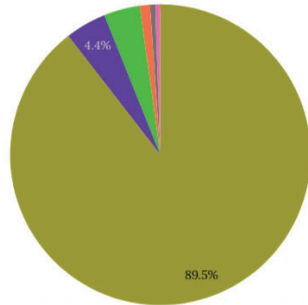
If this provision from the Strategy is included in the new Law on Electronic Media, REM could, in the future, impose new financial penalties on broadcasters that violate legislation. Respondents rated this measure with an average score of 3.2. How-

Q37 To what extent do you agree with the following statement: Media outlets that regularly violate the Serbian Journalists' Code of Ethics should not receive public funds allocated for public interest in the media sphere.

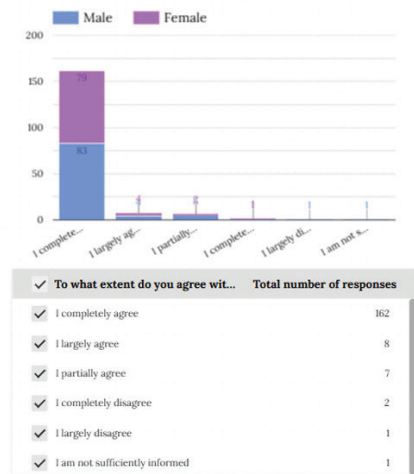
Average score

4.79

Responses
181



- I completely agree
- I largely agree
- I partially agree
- I completely disagree
- I largely disagree
- I am not sufficiently informed



ever, they again question whether this measure can truly improve the performance of an institution “with such a Council.”

It is noted that REM has not utilized the enforcement mechanisms already available under current regulations. “Our experience so far shows that REM has not used the mechanisms it already has. I am skeptical about financial penalties. This measure might have some impact if we ever have a truly independent regulatory body,” one respondent explained.

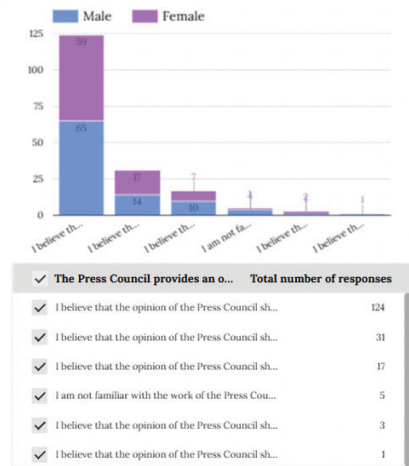
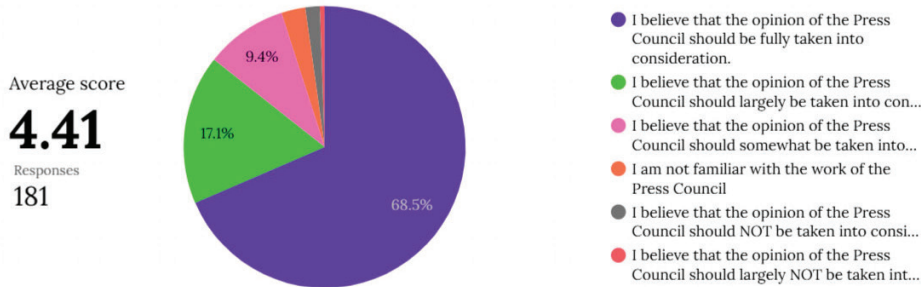
Increasing transparency, openness to citizens, and accountability is one of the planned activities intended to improve the quality of public media services. Media workers’ ratings confirm the relevance of this strategic measure. Nearly half of the survey participants believe that public media services are currently entirely non-transparent, unaccountable, and closed off. A third believe this assessment should be softened, describing them as mostly non-transparent, unaccountable, and closed off. Very few respondents (about 4%) are satisfied with these aspects of RTS and RTV operations.

Media workers are predominantly dissatisfied (completely or mostly) with the way public media services report on local communities. The average rating is 2.1. In this regard, the Strategy’s measure to improve RTS and RTV’s local reporting through a network of correspondent centers and creative use of the possibilities of the digital environment seems very relevant.

Illustrative comments include observations that public media service reporting from the “interior” focuses on “cultural events and ribbon-cutting ceremonies.” Another comment states: “Everything is reduced to folkloric, feel-good human-interest stories. There are no significant news reports or continuity in covering certain topics.” It is noted that public media services face issues with correspondents and only show interest in local matters “mainly when natural disasters are occurring.”

At the focus group on the position of local and regional media, held as part of the research, discussions addressed the possibility of connecting these outlets with public media services. One model for the sustainability and development of me-

Q38 The Press Council provides an opinion on the extent to which media outlets applying for state funds comply with the Serbian Journalists' Code of Ethics. One of the criteria for fund allocation is adherence to the Code. To what extent should the Council's opinion be taken into account when making decisions on the allocation of funds for co-financing media content?



dia outside major centers is seen in their potential legally defined collaboration with RTS and RTV through joint production of media content.

Media workers rated educational measures relatively high in the context of applying the Law on Free Access to Information of Public Importance, with an average score of 3.6. They believe that additional training could mostly (33%) or entirely (28%) contribute to its better implementation. However, distrust in institutions is evident here as well. “Unfortunately, institutions have realized they won’t face sanctions if they do not comply with this law,” said one respondent. It is generally believed that the Commissioner for Information of Public Importance and Personal Data Protection should have greater authority, including the ability to impose more significant financial penalties.

“Those who know what the law says, follow it. Those who don’t, even if they learned, would still not follow it. The polarization of society is most evident in the polarization of media (and media workers) into journalists/media practicing journalism and journalists/media engaging in

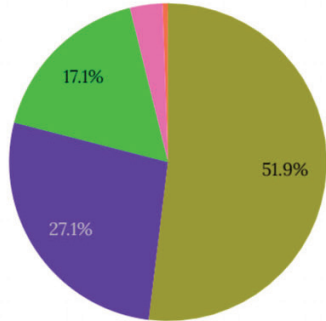
(dangerous) propaganda,” one respondent noted.

Media workers are somewhat more optimistic (average rating of 3.83) about the measure requiring institutions to proactively provide all information and data in a machine-readable format. Forty-four percent of media professionals believe this would significantly ease journalistic work, while 24% think it would mostly make their work easier. Some respondents admitted they do not understand the term “machine-readable.” “Nice idea, but ask colleagues whether state bodies and institutions provide information in any format at all, even when they are obligated to, and even when the information is officially requested. In my experience, they rarely respond to journalistic inquiries but are quick to argue in court that the journalist didn’t publish ‘the other side,’” explained one respondent in their comment.

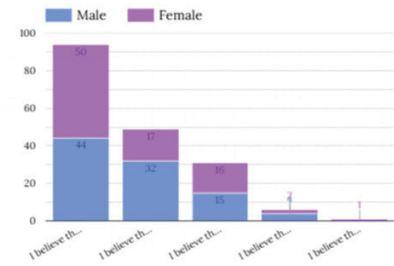
Media professionals are also supportive of training on copyright and related rights, believing such training would contribute to better adherence to these rights (average rating of 4.09). About 43% believe such training would fully contribute, and 32%

Q39 To what extent do you believe that training for journalists on the position of underprivileged groups (minorities, persons with disabilities, youth), women's rights, and gender equality can contribute to non-discriminatory reporting?

Average score
4.26
Responses
181



- I believe they can significantly contribute to non-discriminatory reporting
- I believe they can largely contribute to non-discriminatory reporting
- I believe they can somewhat contribute to non-discriminatory reporting
- ...
- I believe they can largely NOT contribute to non-discriminatory reporting
- I believe they can NOT contribute to non-discriminatory reporting at all



✓ To what extent do you believe th...	Total number of responses
✓ I believe they can significantly contribute to non-...	94
✓ I believe they can largely contribute to non-discrimi...	49
✓ I believe they can somewhat contribute to non-dl...	31
✓ I believe they can largely NOT contribute to non-...	6
✓ I believe they can NOT contribute to non-discrim...	1

think it would mostly contribute to better compliance with copyright and related rights. However, some hold a different perspective: “Journalists should be familiar with copyright and related rights, but journalists (mostly) are not lawyers. This is primarily the responsibility of legal departments or advisors in newsrooms, and editors should be the most knowledgeable about it. Journalists are already overwhelmed with various training sessions, leaving them with little time to focus on journalism, which—paradoxically at first glance—results in less actual journalism in the media.”

High-quality, pluralistic, and diverse media content

One of the specific goals of the Strategy is to establish an environment dominated by high-quality, pluralistic, and diverse media content that meets the needs of various social groups. High-quality content is understood as content produced in accordance with professional and ethical standards. Pluralism and diversity refer to respecting political and other differences, fostering critical thinking, freedom

of speech, and, more broadly, multiperspectivity—views on reality from different angles. Reporting on certain social groups and providing information to specific societal segments requires not only adherence to ethical standards but also additional knowledge and sensitivity. Competitive co-financing is designed precisely to enable state bodies to support media content that enhances the quality and diversity of the media landscape, meeting the needs and interests of a wide range of citizen groups and segments.

One of the measures aimed at contributing to this goal is strengthening the role of the Press Council and self-regulation in the competitive co-financing process. Specifically, print and online media are required to accept the jurisdiction of this body if they wish to compete for state funding. Additionally, in such competitions, media outlets that adhere to the Serbian Journalists’ Code of Ethics should be prioritized over those that consistently violate it. However, during the ongoing drafting process for the Law on Public Information and Media, the provision regarding the Press Council has been challenged by the state.

An overwhelming majority of respondents (89.5%) fully agree that media outlets that regularly violate the Serbian Journalists' Code of Ethics should not receive public funds allocated through competitions for public interest in the media sphere. Respecting ethical standards is a guarantee—and the essence of the Journalists' Code—that media and journalists work in the public, rather than in particular, interest. In their comments, respondents emphasized that violations of the code amount to “mocking the public” and that it is “shameful” that “the very media that violate it receive the most funding or are the

only ones receiving funding.” There were also some criticisms of the Press Council's work, pointing to “excessive puritanism” and a general need for this body to improve the quality of its operations.

The majority of respondents (68.51%) believe that competitive commissions should fully consider the opinion of the Press Council when evaluating project proposals from all print and online media, which fall under its jurisdiction (electronic media fall under REM). Slightly over 17% think that the Council's opinion should generally be taken into account. One respondent noted that

How to Improve Information Dissemination for Different Social

When asked what additional steps could be taken to improve information dissemination for different social groups, respondents provided numerous answers, which can generally be summarized as: the need for better funding, education, enhanced communication, adherence to laws and codes prohibiting discrimination, and similar measures. Here are some indicative comments: “Support civil society media, youth media, and media in the languages of ethnic minority communities.” “Report on them throughout the year, not only on dates related to those groups. Additionally, report on them without discrimination, just as on all members of society, making no distinction.” “Encourage companies and advertisers to support such content as part of their socially responsible business practices. Some suggest quotas in the form of positive discrimination, requiring a set number of articles about specific groups annually, and including members of diverse social groups

in newsroom operations.” “Write about their lives from a positive perspective, showing them as part of the community in everyday life, not only when something happens and they end up in the crime section.” “Mandate sign language interpretation in central news programs on all national television channels. Require all websites in the registry to be compatible with ‘readers’ used by visually impaired individuals. Encourage people with disabilities to pursue journalism through special programs, enabling them to collaborate with journalists to create authentic content for their community, so that coverage of them goes beyond just Disability Awareness Day.” Some respondents believe that “the obligations of public media services should be legally regulated in this context, with detailed requirements for a minimum program dedicated to different social groups.” They also propose introducing similar quotas for private broadcasters with national frequencies.

their answer is not “completely,” because the decisions of this self-regulatory body are “not always absolutely correct.” Another pointed out that the Council’s opinion could only become relevant if there were constant “monitoring of online content.”

Media professionals consider training and workshops for journalists on reporting about the position of underprivileged/vulnerable groups to be important, believing these activities can contribute to non-discriminatory journalism (average score: 4.3). One respondent noted that many media outlets report “horribly” about underprivileged groups and that such training is “not only necessary but should also be mandatory.” Another respondent offered an interesting perspective: “I think training sessions are generally not well-designed, and journalists who attend them gain no privileges within the profession. As a result, the most talented journalists are rarely sent to these sessions unless they are beginners or the training is particularly attractive—for example, because of the location where it’s held. If the number of journalists who have completed training were considered an advantage in applying for public funds, tax reductions, or some other privilege for

the media outlet or individual, I think education would gain more significance.”

The strategic measure aimed at continuously improving the knowledge and skills of journalists working in minority-language media received relatively high ratings. This measure is particularly important because minority media face significantly more staffing issues, due to the emigration of young people, compared to media reporting in the majority language. Half of the respondents believe that this activity can fully meet citizens’ needs for higher-quality information, while slightly less than a quarter believe it can mostly meet this need (average rating: 3.97). Some respondents feel the measure will not be effective as long as minority media remain “in the hands of minority political parties, which have turned them into newsletters.” Others argue that “the problem is not with the journalists but with the editors.” The Strategy also outlines a series of measures intended to reduce political influence and enhance editorial autonomy in minority media, especially those indirectly managed by national councils of national minorities. “I have witnessed the closure of many minority-language media outlets. For this

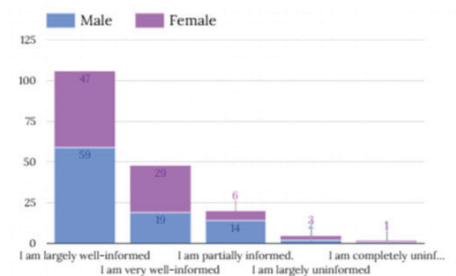
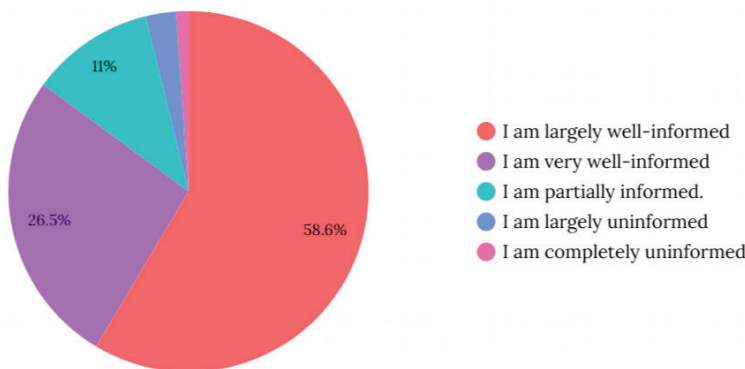
Q44 How would you assess your knowledge of media literacy?

Average score

4.06

Responses

181



How would you assess your know...	Total number of responses
I am largely well-informed	106
I am very well-informed	48
I am partially informed	20
I am largely uninformed	5
I am completely uninformed	2

Media and Digital Literacy – Concrete Measures

The survey participants were also asked to propose concrete additional measures to enhance media and digital literacy in Serbia. A significant emphasis was placed on formal and informal education for both media professionals and citizens of all ages. Additionally, the critical role of public media services in this process was highlighted, suggesting they “dedicate more attention to this topic,” as well as private national TV channels.

One respondent proposed: “Introduce a short program on national TV channels, similar to the former show ‘It’s Not Hard to Be Polite’, and air it before the prime time evening news (Dnevnik 2). Showcase examples of spin, lies, and propaganda in the media. Illustrate cases in which the Press Council ruled violations of the Code of Ethics and use these examples to teach citizens how to consume media critically.”

There were also suggestions for the Ministry of Information and Telecommunications to design and execute creative social media cam-

paigns aimed at attracting clicks from younger audiences. Another idea proposed: “Flyers for the older population, more segments in the main news programs of the public media service (and other TV channels and media outlets) about online safety and media literacy in general.”

Additionally, a recommendation was made to “establish partnerships between media organizations and educational institutions for joint initiatives promoting media and digital literacy.”

One media professional noted: “Address and work with different age groups in diverse ways. Pay special attention to digitally educating older, analog generations, who are more prone to uncritically accepting information from digital environments. Children could hold lessons for their grandparents, and even their parents.”

category of media to survive at all, knowledge and skills must be continuously improved,” said one media professional.

The existing Law on Public Information and Media protects minors, specifically the free development of their personality. It states that care must be taken to ensure that the content of media and its distribution methods do not harm the moral, intellectual, emotional, or social development of minors.¹⁵ In 2015, REM adopted the Rulebook on the Protection of Minors’ Rights in the Field of Media Service Pro-

vision.¹⁶ Both acts include penalty provisions. The measure introduced by the Strategy goes a step further, proposing that regulatory changes mandate media outlets to implement appropriate technical measures and solutions to prevent children and minors from accessing media content that could harm their physical, mental, or moral development.

70% of respondents fully agree with this measure, which received a high average rating (4.4%). However, some expressed reservations in their comments. One re-

¹⁵ https://www.paragraf.rs/propisi/zakon_o_javnom_informisanju_i_medijima.html

¹⁶ https://www.paragraf.rs/propisi/pravilnik_o_zastiti_prava_maloletnika_u_oblasti_pruzanja_medijskih_usluga.html

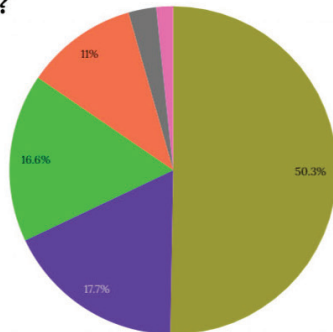
Q45 To what extent do you believe that public awareness campaigns in the field of media literacy, as well as the introduction of media literacy as a subject in the education system, contribute to improving the quality of media offerings in our country?

Average score

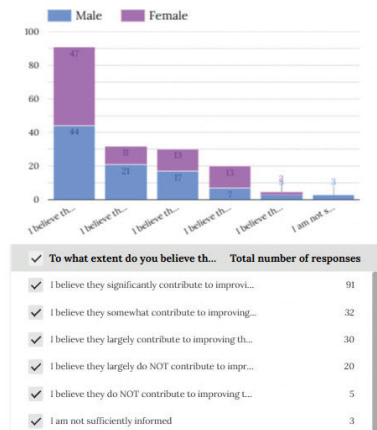
3.96

Responses

181



- I believe they significantly contribute to improving the quality of the media offering in our country...
- I believe they somewhat contribute to improving the quality of the media offering in our country...
- I believe they largely contribute to improving the quality of the media offering in our country
- I believe they largely do NOT contribute to improving the quality of the media offering in our country...
- I believe they do NOT contribute to improving the quality of the media offering in our country at all
- I am not sufficiently informed



To what extent do you believe th...	Total number of responses
✓ I believe they significantly contribute to improvi...	91
✓ I believe they somewhat contribute to improving...	32
✓ I believe they largely contribute to improving th...	30
✓ I believe they largely do NOT contribute to impr...	20
✓ I believe they do NOT contribute to improving t...	5
✓ I am not sufficiently informed	3

respondent believes such a measure could lead to “a new form of censorship” and “would quickly be abused.” Another holds the opposite view, arguing that penalties should be “draconian.” A third respondent doubts the feasibility and effectiveness of implementing this strategic activity, pointing out that “similar provisions already exist in current laws but are not enforced.”

Civil society media can fill informational gaps, particularly at the local and regional levels, and play a crucial role—as a bridge between the media and civil sectors—in informing and reporting on underprivileged/vulnerable groups. One of the measures in the Media Strategy proposes the establishment of a dedicated fund for financing media content and programs of civil society media, as well as tax incentives. Approximately 43% of respondents fully agree, and 32% mostly agree, that this activity could support the further development and sustainability of non-profit media. However, one respondent emphasized the need to clearly define what is meant by civil society media to prevent potential abuses. “When it comes to civil society media, we are also ‘on thin ice,’ consider-

ing the flood of GONGO and PONGO organizations—nominally non-governmental organizations—that establish media outlets claiming to be civil society media. I fear that if this fund is created, it could also become a tool for financing ‘obedient’ outlets,” the respondent stated.

Media and Digital Literacy

Unlike the previous Media Strategy (from 2011), the current one thoroughly addresses the topic of media and digital literacy. However, despite the absence of broader strategic guidelines and measures in the previous document, many initiatives to increase media literacy have been launched over the past decade. These initiatives mostly involve incorporating educational programs on this topic into the formal education system.

Although media literacy is already available as an elective subject, experts in the focus group believe this is insufficient. They argue for an increased number of media literacy classes, integration of education on this subject throughout the entire education system, and the expansion of such programs beyond formal

education. The current Strategy takes a broad approach to this topic, expanding the target groups that require higher levels of media and informational competencies. Among these groups are media workers themselves, whom the document assesses as lacking the necessary digital skills—at least a significant portion of them. In the survey, media workers claimed to generally possess good knowledge in the area of media literacy (average score: 4.07), though only slightly more than a quarter stated they are very well-versed in the topic.

Around half of the respondents believe that awareness-raising campaigns about the importance of media literacy, as well as introducing a relevant subject into the education system, significantly contribute to improving the quality of media offerings (average rating: 3.96). “The more media-literate the audience, the less likely they are to consume pseudo-media,” said one participant. Some believe that media literacy should be introduced “from the first grade of primary school,” while others advocate for teaching it even in “pre-school.” One respondent stated that “citizens need to learn how to read the news.”

However, some are skeptical, arguing that nothing, including media literacy, can lead to better-quality information “under these circumstances.” An interesting perspective came from one media professional: “I believe that media literacy should not be a separate subject, as children already have too many subjects. Instead, it should be an important part of the curriculum for Serbian language and literature, from the first grade of primary school to the end of high school. For this purpose, it is also neces-

sary to organize media literacy training for teachers and professors.”

As many as 58% of respondents believe that regular training for media and journalists in digital literacy (programming, complex database searches, etc.) would significantly contribute to improving the quality of public information (average score: 4.30). This opinion aligns with the stance outlined in the Strategy, which states that increasing journalists’ digital competence and improving media literacy are complementary goals that would collectively enhance the capacities of journalists, media outlets, media consumers, and public policy makers.

As part of the measure to improve citizens’ information security in the media environment, the Strategy outlines activities aimed at raising awareness of the specific vulnerabilities of citizens to privacy abuses and security threats both online and offline (especially for members of vulnerable social groups). Respondents believe this measure would have an effect, either somewhat or entirely (average rating: 4.05). Approximately 45% think this activity would significantly contribute, while about 21% believe it would somewhat contribute to enhancing citizens’ safety in the media space. Women, media workers affiliated with IJAV and ANEM, and journalists from minority-language media gave slightly higher ratings to this measure and its impact. Regarding campaigns aimed at encouraging media outlets to establish clear rules for online privacy protection (such as the use of cookies, informing users about all relevant aspects of data processing, etc.), respondents believe this activity

would significantly (34%) or mostly (32%) contribute to better information security (average rating: 3.84).

The Specific Position of Local and Regional Media

The previous Media Strategy and the laws derived from it led to significant changes in the configuration of the media market, particularly in the field of local and regional information dissemination. The withdrawal of the state from media ownership primarily involved the privatization of outlets that were publicly owned at the local or regional level. This privatization resulted in new forms of media concentration and the creation of conglomerates closely aligned with ruling political parties. These developments were accompanied by issues in the process of competitive co-financing of media content, as privatized media outlets were (and remain) favored in this process.¹⁷ The problem of media pluralism at the local level is more significant than at the national level. Additionally, professional media outlets in smaller communities face greater challenges than national outlets, particularly in terms of sustainability and safety.

We have already discussed the importance of local and regional media in the development of a democratic society: they are—as often stated—among the best indicators of the state of democracy. They provide information that is absent from major media outlets, which is essential for citizens to make valid and informed decisions, not only during electoral processes. Local content can also be valuable to a broader

audience not geographically tied to a specific community, due to the specificity of certain topics. Unlike national media, local outlets have a direct, closer connection with the community and actively participate in shaping the community's identity, serving as a form of cultural asset. Additionally, local media play a vital role in line with the general purpose of high-quality public information: to act as a corrective force for local authorities and political and social processes.

The problem of local information dissemination has a broader scope. Numerous studies point to a serious crisis in local information at the global level.¹⁸ There is a growing number of areas where a lack of media pluralism at the local level is identified. Over the past year, comprehensive research has been conducted to identify “media deserts” in EU member states. This phenomenon is examined not only through the lens of a declining number of local, regional, and civil society media outlets but also by considering factors such as market dynamics, safety, social cohesion, and political independence.¹⁹

The results of the latest Media Pluralism Monitoring for Serbia²⁰, but other re-

¹⁷ http://birnsrbija.rs/wp-content/uploads/2016/02/izvestaj_meka_cenzura_final.pdf

¹⁸ <https://www.usnewsdeserts.com/>

<https://www.routledge.com/The-Routledge-Companion-to-Local-Media-and-Journalism/Gulyas-Baines/p/book/9780815375364>

<https://labcomca.ubi.pt/news-deserts-europe-2022-portugal-report/>

<https://www.hnd.hr/hrvatsko-novinstvo-u-medijskoj-pustinji>

¹⁹ <https://cadmus.eui.eu/handle/1814/75762>

²⁰ https://cadmus.eui.eu/bitstream/handle/1814/75736/serbia_results_mpm_2023_serbian_cmpf.pdf?sequence=3&isAllowed=y

searches too²¹, indicate the difficult situation faced by media outlets that perform their work objectively and professionally at the local and regional levels. What further complicates the establishment of adequate support systems is the lack of data on the local media market, whether in the form of research on local listenership, readership, and viewership, or regarding the revenue of local and regional media outlets.

The current Media Strategy correctly identified the importance of local and regional media and proposed measures to improve their position. However, as shown by the results of the overall research and the views of journalists and media workers, three and a half years after its adoption, the situation has not improved; in fact, numerous regressive processes have occurred. This is a consequence of the fact that the proposed measures have not been implemented (not a single law has yet been amended in accordance with the Media Strategy), and new trends and phenomena are emerging that further jeopardize the work of local media. If we look at the APR (Agency for Business Registers)²² The number of local and regional media outlets is not insignificant, as indicated by data from the APR (Agency for Business Registers). However, based on discussions in the focus group and interviews, it is clear that a significant portion of these outlets

are either inactive or only active during periods when calls for project co-financing or public procurement are announced and implemented. There are even phantom media outlets that are not officially registered. These outlets illegally take content from professional media at the local level, republishing it as their own, creating unfair competition and further threatening the survival of professional local media. These outlets are often portals with servers/hosts located in foreign countries, making it difficult or impossible to pursue legal action against them for copyright and intellectual property violations.

In the advertising market, local media face unequal competition with national outlets, as advertisers—especially large ones—are generally uninterested in targeting local audiences.

In the absence of other revenue sources, local media largely depend on competitive co-financing of media content. As a result, they are much more affected than national media by the numerous issues in this area, which essentially boil down to state aid being directed (almost) exclusively to “favored” media that do not adhere to ethical reporting in line with the public interest.

Media expert Rade Veljanovski explains that the concept of competitive co-financing was primarily designed as a form of support for local-level media and content, even when funds are allocated at the national level. However, practice shows that national media, including those that consistently violate the Serbian Journalists’ Code of Ethics, receive significant funds even at the local level, despite often not having a single correspondent in those ar-

21 https://localpress.org.rs/lp_izvestaj-o-pritiscima-na-lokalnemedije-2021-2022/

<https://ifdt.bg.ac.rs/wp-content/uploads/2022/05/Aleksandra-Krstic.pdf>

<https://www.osce.org/files/f/documents/5/a/473682.pdf>

22 <https://apr.gov.rs/%D0%B-F%D0%BE%D1%87%D0%B5%D1%82%D0%BD%D0%B0.3.html>

eas. Participants in the focus group stated that the strategic measure giving priority in funding to media outlets that report ethically is extremely important to them. However, they expressed concerns that it will not be implemented as intended. They are also skeptical that other measures from the Strategy, aimed at improving the co-financing process (such as transparency, criteria for commission members, evaluation, and more), will have tangible effects, especially at the local level. “On paper, the solutions may be perfect, but the problem lies in implementation,” said one of the focus group participants.

As mentioned earlier, the advertising market is centralized, which places local media at an additional disadvantage.²³ To determine media potential, advertisers use commercial measurements in which smaller media outlets do not participate at all. Local and regional media are discriminated against in this regard, and it is no surprise that the 15 largest advertisers in the country do not collaborate with any regional or local outlets. Nearly all advertising on television is allocated to channels with national coverage, while the majority of the remainder goes to foreign programs distributed through cable systems. Media professionals we spoke with therefore consider the Media Strategy measure to assess the value of local/regional advertising markets and the share of local/regional media in the audience as very important. They also view as significant the measure requiring public enterprises to allocate at

least 15% of their annual advertising budgets to regional and local media. However, they fear that in practice, this measure may once again become a tool to support only media outlets close to the authorities. This concern also applies to other measures for local media outlined in the Strategy, such as the potential introduction of tax incentives or tax credits for local and regional outlets, which has already been discussed.

Media professionals believe that networking among local media is very important, not only for the exchange of experiences and knowledge but also for the potential sharing of content and joint efforts in approaching advertisers. Additionally, networking can support applications to international donors, who are a key element in the sustainability of some local outlets.

Another significant issue highlighted by representatives of these media is the lack of solidarity and unity within the “industry.” They emphasized that more effort is needed to collectively present demands to the government. The solution, they suggest, lies in improved collaboration between associations and organizations, as well as potentially creating spaces for media workers to exchange experiences, share information, and provide direct support to one another.

When it comes to connecting with their audience, all respondents emphasized that they have a good and direct relationship with their readers, viewers, and listeners, who actively contribute to content creation through their suggestions, questions, and comments. Sometimes, the challenge arises because the media outlets lack the capacity to cover all the proposed topics. Some local

23 <http://www.rem.rs/uploads/files/izvestaji%20o%20nadzoru/Analiza%20medijiskog%20trzista%20u%20Srbiji%20IPSO%20avgust%202015.pdf>

media outlets, recognizing that a significant portion of their community struggles to identify accurate and relevant information, actively participate in promoting media literacy among their audiences.

Examples illustrated during the research showed that crowdfunding campaigns conducted in recent years have not significantly contributed to the sustainability of local media. This is due to the lack of a tradition of civic funding for media and media content, a low level of media literacy, high levels of poverty, and the fact that such campaigns require substantial time, energy, and resources that local media do not possess.²⁴ Media expert Snežana Milošević²⁵, representative from the Local Press association believes that the Media Strategy has not devoted sufficient attention to local media, considering their media and social significance and the dire situation they currently face. “Local media, unless they belong to groups aligned with the authorities, are left to fend for themselves in figuring out how to survive,” she says. She points out that in recent years, Western countries have either adopted or are in the process of adopting legal solutions aimed at enhancing the sustainability of local media. Their importance is being recognized, particularly the value of trust in the field of public information, which is the greatest asset of local information. Unfortunately, she notes, some local media outlets in Serbia that have built trust

over the years are now being purchased by politically influential individuals, resulting in changes to their editorial policies.

The Fight Against the Spread of Disinformation ²⁶

The Fight Against the Spread of Disinformation ²⁷ is an important topic practically worldwide today. Disinformation poses a serious threat to democracy, undermines trust in institutions and media, jeopardizes electoral processes, makes it difficult for citizens to make informed decisions, and represents a significant challenge to freedom of expression. The key dilemma is how to systematically and institutionally combat harmful media content, such as false information, without compromising freedom of expression and media freedom.

At the EU level, the first significant steps were taken in 2018 to define this phenomenon as a societal threat requiring protective mechanisms.²⁸ Since then, efforts have been intensively focused on improving measures, for example, through the work of the European Digital Media Observatory(EDMO)²⁹ and new EU legislation intro-

²⁴ A focus group on the sustainability and challenges of local and regional media was held on August 30, 2023. The list of participants can be found in the appendix of this research.

²⁵ An interview with media expert Snežana Milošević, the general secretary of the Local Press association, was published as part of the research.

²⁶ A focus group on the spread of misinformation and the Media Strategy was held on September 4, 2023. The list of participants can be found in the appendix of this research.

²⁷ Misinformation refers to all forms of false, inaccurate, or misleading information that is created, presented, and promoted with the intent to deliberately cause harm to the public or for profit. <https://www.ecsite.eu/activities-and-services/resources/final-report-high-level-expert-group-fake-news-and-online>

²⁸ Action Plan for Combating Misinformation <https://digital-strategy.ec.europa.eu/en/library/action-plan-against-disinformation>

EU Code of Practice on Disinformation <https://digital-strategy.ec.europa.eu/en/news/code-practice-disinformation>

²⁹ <https://digital-strategy.ec.europa.eu/en/policies/european-digital-media-observatory>

duces co-regulatory factors and greater responsibility for social platforms in this process³⁰. One of the latest documents from experts in this field is a proposal for structural indicators, as outlined in the EU Code of Practice on Disinformation. These indicators are intended to help examine this phenomenon and assess the effectiveness of the Code itself.³¹ The measures are primarily based on mechanisms for detecting, analyzing, and deconstructing disinformation, as well as on enhancing societal resilience, with the mobilization of the private sector, particularly the IT sector.

Although this complex process is progressing slowly even at the EU level, with extensive debates, it is nevertheless moving toward potential solutions. In Serbia, however, this topic has yet to be recognized as particularly important. Media expert Tanja Maksić stated in an interview conducted for this research that the Strategy focused on issues and topics that should have been resolved long ago and are beyond question, but failed to address more significantly the current challenges facing the global media community, especially in the context of technological advancements and the new phenomena accompanying them.

Serbian legislation includes certain mechanisms for combating disinformation (the Criminal Code, the Law on Public Information and Media, and the Law on Electronic Media). However, these are relatively outdated, do not account for recent changes, and face well-known issues such

as poor enforcement and institutional inefficiency. There are also self-regulatory mechanisms, but these are not sufficiently effective either.

In Serbia, the dilemma of how to institutionally combat the spread of disinformation without compromising freedom of expression is particularly dramatic. Experts point out that the state itself promotes, funds, or even produces unverified and inaccurate content. Focus group participants fear that greater state involvement in combating disinformation could be counterproductive, potentially serving as a tool to further suppress media freedoms. The Media Strategy addresses the fight against disinformation in sections related to improving media literacy (enhancing societal resilience) and establishing a co-regulatory mechanism.

Currently, the most active actors in the fight against disinformation in Serbia are fact-checking organizations.³² (such as Fake news tragača, Istinomera, Raskrikavanja). They focus on identifying and highlighting inaccurate information and manipulations in the public sphere. Some representatives of fact-checking organizations noted, and emphasized during the focus group, that the spread of disinformation has recently become more insidious and harder to prove. Tabloids remain the flagbearers of unprofessional reporting, but they have evolved and now more often publish content that manipulates facts rather than spreading outright falsehoods. Such content is harder

30 Digital Service Act (DSA) https://ec.europa.eu/commission/presscorner/detail/en/QANDA_20_2348

31 https://cadmus.eui.eu/bitstream/handle/1814/75558/WP%202023_34.pdf?sequence=1&isAllowed=y&mibextid=Zxz2cZ

32 Fact-checking refers to an impartial report that assesses the accuracy of publicly available statements made by public figures, institutions, and information published by traditional media or websites: <https://www.istinomer.rs/analize/fektcekeri-zanat-najnoviji/>

to deconstruct. Fact-checkers have the impression that these newsrooms have internal agreements to avoid spreading explicit lies and that directives in this regard come from a centralized authority. Additionally, it appears that the international community does not sufficiently condemn this approach, which results in the dissemination of dangerous and alarming narratives, not only in Serbia but throughout the region. However, some positive changes on the global level have also impacted the media landscape in Serbia. For example, Meta, through its social media platform Facebook, has reduced the visibility of media outlets that spread disinformation, thanks to its collaboration with fact-checking organizations³³ around the world that “flag” such content as problematic. As a result, for example, some media outlets systematically correct disinformation they previously disseminated to improve their visibility. This indicates a certain shift in their behavior when they experience negative financial consequences. There are also cases where media outlets correct misinformation but later republish the same false story, hoping to outsmart the system of this social media platform.

Project-based co-financing in Serbia often supports media outlets that, by violating ethical codes, spread disinformation or employ other manipulative mechanisms, according to participants. This is, of course, contrary to existing legal provisions and especially to the measures outlined in the Strategy, which thoroughly address this

issue. Experts argue that this approach effectively promotes the violation of ethical standards, the spread of disinformation, and other forms of manipulation, turning these practices into a kind of business model.

The Strategy proposes measures aimed at doing the opposite: state aid should reward credible sources of information, which would include strengthening fact-checking organizations and their content. However, focus group participants believe these measures will not be implemented due to a lack of political will to change current practices.

The focus group also expressed concern about the current use of artificial intelligence for spreading disinformation. The response from the relevant authorities (REM) to this practice on Pink Television was lukewarm, and nothing has changed. This outlet has continued using this technology for “satirical purposes.”³⁴

Artificial intelligence in our country is already in broader institutional use within various state systems (such as the social card information system or the use of cameras for biometric surveillance). Although Ethical Guidelines for the Use of Responsible and Reliable Artificial Intelligence have been adopted³⁵, the main issue with them is that they are not binding, nor do they explicitly address the misuse of this technology for creating false content.

As previously mentioned, the Strategy inadequately addresses the issue of disinformation. Some focus group participants

33 <https://insajder.net/arhiva/vesti/istinomer-i-afp-zvanic-ni-partneri-fejsbuka-u-suzbijanju-laznih-vesti-na-toj-drustvenoj-mrezi-u-srbiji>

34 <https://www.slobodnaevropa.org/a/zloupotreba-u-javnost-prostoru-vestacka-inteligencija/32554200.html>

35 http://demo.paragraf.rs/demo/combined/Old/t/t2023_03/SG_023_2023_007.htm

believe that the work on the Strategy served more as a platform for negotiations with the state, missing the opportunity to make the document more innovative. One of the problems in this context is the fact that the new Law on Public Information and Media (which, at the time of writing, has entered public discussion) will, by all indications, contradict key strategic solutions and reduce the role of the Press Council in the competitive co-financing process. This will, in turn, mean that media outlets that consistently violate the Serbian Journalists' Code of Ethics—spreading disinformation among other things—will continue to be rewarded with public funds, “in accordance with the law.”

The previous Ministry of Culture and Information was particularly proud of the well-developed strategic measures related to media literacy, which indirectly target the fight against disinformation. However, the information sector has since been moved to a new platform and now operates under the Ministry of Information and Telecommunications. This shift has led to a kind of “sacrifice” of media literacy, with greater emphasis placed on information literacy. According to one focus group participant, this is a consequence of the ministry's composition and the absence of a state secretary for information. As an illustrative example of the state's passivity in promoting media literacy, the participant pointed out that while Serbia has joined Digital Europe, it is on the verge of being excluded from the Creative Europe project due to non-compliance with provisions from the Strategy.

All focus group participants agree that a significant question remains: to what ex-

tent and in what way should state representatives be involved in the fight against disinformation? Any potential legal definition of disinformation could either be too broad or too narrow, resulting in either an ineffective law or one prone to abuse. Solutions might lie in more innovative bodies, such as co-regulatory mechanisms, which are already outlined in the Strategy, or some form of advisory body that could serve as a platform for discussion and potentially maintain a registry of good and bad practices (a repository of disinformation). Inspired by the World Health Organization's body established to combat the infodemic, this advisory body could include experts from various fields who would actively participate in the fight against disinformation. Focus group participants noted that it is sometimes challenging to find experts in specific areas when deconstructing certain information.

Given the high level of confusion among citizens, who are unsure whom to trust or where to find relevant information, it is essential to take a more active approach in promoting media literacy and highlighting specific examples of disinformation. Public media services could play a crucial role in this effort, potentially by being required to collaborate with fact-checking organizations. Special attention should also be given to seniors over 65, who make up one-fifth of the total population. Journalism students could be engaged in creating promotional and educational content, according to focus group participants. The focus group agreed that activities aimed at raising media literacy levels should primarily target younger generations. They suggested considering making media literacy educational content

mandatory rather than optional. Additionally, a more innovative approach to education is necessary, as this subject requires two-way communication, given that students already possess significant and specific knowledge in the area of digital literacy. Furthermore, guest lecturers, fact-checkers, or senior journalism students should also be involved in these efforts.

Issues with Law Enforcement

During the drafting of this report, public discussions began on the proposed Law on Public Information and Media and the Law on Electronic Media. These discussions are expected to be highly dynamic, primarily because some of the key provisions in these draft laws are in direct contradiction to the Media Strategy—a document agreed upon three and a half years ago by the Government of Serbia, journalistic and media associations, and media experts³⁶. Experts we spoke to claim that this has undermined years of work on the Media Strategy and the Draft Law on Public Information and Media (ZJIM), into which associations invested enormous energy. At the same time, as previously mentioned, associations and organizations found themselves in a difficult position: due to mistrust in institutions, many of their members did not understand why these organizations participated in the process. On the other hand, they were under pressure from international actors who insisted on the necessity of their involvement. (Participants in the development of the Strategy and ZJIM noted that international organizations

involved in the process were satisfied with formal procedures and showed no interest in substantive issues or problems.) Additionally, the role of media associations and organizations is to participate in drafting key media documents. However, when it came to the drafting of the Law on Electronic Media (ZEM), associations were excluded from the process by the Ministry.

As previously mentioned, the proposed legal solutions significantly diminish the role of the Press Council in the competitive co-financing process compared to the strategic solutions. This will allow the continued funding of media outlets that consistently violate ethical standards. Based on statements from officials, it is not out of the question that the government may attempt to establish its own self-regulatory body (GONGO).

Tanja Maksić points out that all of this demonstrates that the state has no vision and instead adapts laws to its immediate interests. Otherwise, it would support the development of the Press Council in various ways, recognizing that its societal role is far more significant than mere participation in the co-financing process. Furthermore, the Draft Law on Electronic Media (ZEM) removed the provision from the Strategy that stated the current composition of the REM Council would be “reset” after the adoption of this law, with a new Council selected based on updated criteria. In practice, the current members of this body will now assume significantly greater powers granted by the new legal provisions.

This composition of the Council has demonstrated that it has neither the capacity nor the willingness to fulfill even

36 <https://nuns.rs/koalicija-za-slobodu-medija-pred-lozi-vlade-znacajno-odstupaju-od-medijske-strategije-i-one-mogucavaju-reformu-medijskog-sistema/>

smaller responsibilities. As a result, according to numerous researchers, including international organizations, it bears significant responsibility for the current state of the media landscape.

In both laws, the government has, at the last moment, inserted identical provisions allowing the state to return to media ownership, retroactively legalizing the currently illegal management of certain public outlets by Telekom Srbija. By doing so, the government is effectively overturning the entire media reform initiated in the early 2000s and the repeatedly stated strategic commitment of the state to not own media.

Experts warn that Telekom will become the most significant media player in Serbia if these provisions are included in the laws, although its current role in this regard is already enormous. Tanja Maksić notes that Telekom is currently not only a founder but also a major financier of pro-government media, although precise data on this is unavailable. It is likely that this influence will grow even further in the future, and the public will remain uninformed about how much this state operator invests in the media sphere, as accessing information from the company under the Law on Free Access to Information of Public Importance is impossible (they cite business secrecy). She views this issue within a broader context: powerful telecommunications companies are investing substantial amounts of money in the media sphere, fundamentally changing it and often adapting it to their own interests. This is not a phenomenon limited to Serbia. Associations also warn that there are other parts of the draft laws that are not aligned with the Strategy.

Media expert Rade Veljanovski states: “If everything happens as the authorities currently intend, we will regress 20 years in the development of our media system. This will not be progress but a step backward. The losers will be the general public, all citizens of Serbia, and professional media outlets and journalists. The winners will be the pro-government media and journalists. They will fare even better than they do now, and even now, they are not doing poorly. The main winner will be the government, as it will continue to exploit a large number of media outlets for propaganda purposes. These are media outlets with the widest coverage and the largest numbers of listeners, readers, and viewers.”

This raises the question of what position media and journalistic organizations should take in future media reform processes. Should they withdraw entirely, setting “red lines,” or should they continue participating, despite the processes being lengthy, exhausting, and likely to result in completely unsatisfactory outcomes?

Zoran Gavrilović³⁷ from states that Serbia is a country where power is above the Constitution and laws, let alone strategic documents. However, it believes that journalistic and media associations must continue participating in the processes of drafting important media legislation, despite poor results. BIRODI emphasizes that the civil sector must demonstrate its commitment to preserving the state by participating in legal procedures and “fighting” the authorities within those frameworks, even when it seems pointless. It highlights that the adop-

37 An interview with Zoran Gavrilović, the executive director of the Bureau for Social Research (BIRODI), was conducted as part of the research.

tion of the Media Strategy is important because Western institutions, “if they are at all interested in Serbia,” will only understand us if we insist on solutions already outlined in official documents. “It is important, however, that the media community does everything possible to involve citizens and their organizations, explaining to them that without media freedom, there can be no social progress, and without it, we will never become an organized society,” it states. Snežana Milošević from Local Press says that none of the associations involved in drafting the Media Strategy believed it would be fully implemented. According to her, this document is merely a foundation for a struggle that will be long and exhausting. “Associations must remain persistent in this fight and continue to actively participate in the processes. We must involve the public as much as possible and inform them about legal violations and numerous other deviations in the media landscape. If we step out of the picture, we will lose our positions, and other associations will take our place. The government would eagerly welcome that,” she says.

Stevan Ristić states that throughout the entire new reform cycle, it has been clear that the authorities perceive journalistic

and media organizations as a “necessary evil.” The government deliberately obstructed work on the Media Strategy and the Law on Public Information and Media (ZJIM), and with the latest proposed legal solutions, the participation of associations has been rendered meaningless and even ridiculed. He warns that associations were, on multiple occasions, on the verge of withdrawing from the process, but doing so would have prevented them from having even minimal influence on laws regulating the media sector. Had they withdrawn, the authorities would have portrayed them as the “opposition” and would have undoubtedly included representatives of GONGO organizations in the commissions. “However, red lines must be drawn. We need to clearly communicate to the authorities, our members, and the general public what we can agree to and what we absolutely cannot,” Ristić says. In any case, the question of media organizations’ participation in future reform processes is a complex one. The answer to this question should be determined by associations through extensive consultations with their members, media professionals, experts, and representatives of civil society.

4 RECOMMENDATIONS

RECOMMENDATIONS

The recommendations are a combination of suggestions made by media workers and experts during the survey, focus groups, and in-depth interviews, as well as the researchers' perspectives derived from the overall analysis of the collected information. Suggestions that are already included in the measures or planned activities of the Media Strategy in (almost) identical form have not been incorporated into the recommendations.

General recommendations

- Associations should improve communication with their members and keep them as informed as possible about all aspects of the process of drafting important media documents, primarily strategies and relevant laws, using less technical and more broadly understandable terminology.
- In that communication/information process, it is necessary to clearly and precisely explain to the membership what benefits the media community and they individually can gain from certain good strategic and legal solutions, and what harm can result from poor ones.
- All key information about both strategic and relevant legal solutions, along with information about the drafting and adoption processes and the issues within them, should be prominently displayed on the websites of associations, organizations, and unions.
- Associations should make much greater efforts to listen to the opinions and views of their members regarding their activities in drafting strategic and legal documents, providing an interactive platform that enables efficient and transparent two-way communication.
- Members, as well as other parts of the media community and even partner civil society organizations, need to be informed about all aspects of the participation of organizations, associations, and unions in media reform processes—through webinars, short video clips, online newsletters, and other educational programs. The content should be tailored to the participants/users, highlighting details that are particularly important to them.
- Continuously involve representatives of local media and media from multi-ethnic communities in the processes, as their position is specific, and their perspectives are highly significant.
- The decision on the nature of further participation in media reform processes should be made by associations through broad consultations with members, media professionals and experts, as well as representatives of civil society.
- Associations and organizations should intensify their contacts with international stakeholders, not only with officials but also with partner organizations and civil society in general, to gain their support for their positions. This includes support for the effective and swift implementation of solutions outlined in the Media Strategy.
- The international community should demand substantial changes in Serbia's media landscape, rather than merely supporting

prolonged and unproductive formal processes.

Labor Rights and Safety of Journalists

- All key stakeholders in the media landscape, particularly associations and organizations, should publicly advocate for employers' compliance with the Labor Law. Everyone should insist that media workers receive adequate wages, rest, health care, and, for those in need, psychological support. This approach will significantly increase the level of trust among members, especially in journalistic associations.
- The Permanent Working Group for the Safety of Journalists must promote its work more extensively, especially in smaller communities, to ensure that media workers are aware of its role and the opportunities it offers in protecting their safety.
- All stakeholders in the media landscape, including the Permanent Working Group for the Safety of Journalists, should share cases of threats to journalists' safety with the public to a much greater extent, aiming to create the broadest possible coalition for their protection. This coalition should also include other civil society organizations.
- All stakeholders in the media landscape, including the Permanent Working Group for the Safety of Journalists, should persistently insist that government officials and other

public figures stop targeting journalists and media workers.

- It is necessary to support activities and programs that will encourage greater solidarity among journalists.

Media market

- It is necessary to create a broader advocacy platform that would insist on the legal implementation and practical realization of all measures to improve the system of project co-financing of media content from the Media Strategy, based on the principles of transparency, independence, inclusivity, and accountability.
- Prevent media that irregularly update content on their websites, or only do so during the project implementation period, from applying for grants.
- Modify the Media Register in such a way that it includes information about the professional capacity of specific media outlets, such as the qualifications of editors. Professional capacity should be one of the important criteria for awarding funds in media content co-financing competitions.
- All meetings of the selection committees must be made public.
- Prevent media with related legal entities from receiving more than 30% of the funds in a single competition.
- It is necessary to create a register of media experts for work in selection committees. They must meet clear, pre-defined criteria. Government bodies should be obligated to

select members of the selection committees from this register.

- Consider the possibility of making the media content co-financing competitions anonymous, without specifying the media outlet or legal entity applying in the project proposal. Only after funds are approved for a quality project proposal should the connection with the applicant be made.
- Introduce criteria in local competitions that would prevent media registered in other cities and municipalities, including national media, from receiving funds if they do not have experience in reporting from the respective area or do not have a correspondent from that area.
- It is necessary to create a broader advocacy platform that would insist on preventing state-owned enterprises (such as Telekom) from being media founders. Legalizing the state's return to media ownership could further undermine the media system and completely prevent the creation of a fair and non-discriminatory media market.
- Conduct a more detailed research to obtain the most precise data on the extent of participation of telecommunications companies in the media market of Serbia, and the consequences of that participation.

Institutions

- The transparency of the work of REM should be increased, in addition to the measures set forth by the Strategy, by broadcasting the sessions of the Council of this body in real time, and the members of the REM Council should be obligated to provide a public response to any question or comment meaningfully directed to them by a citizen. This should include publish-

ing questions to which REM does not have an answer, along with an explanation as to why it is unable to provide an answer.

- Public media services must expand the number of correspondents from local communities, as well as commit to producing a certain percentage of their programs in collaboration with local and regional media.
- Journalists and media workers are not fully familiar with the concept of “machine-readable format” and should therefore be educated on the meaning of this term and the benefits this format provides for media professionals.
- Education on copyright and related rights should be formatted in a way that is adaptable to journalistic work, and short video clips on the websites of associations and organizations, as well as on social media, can be used as an option.

Pluralistic media

- Work should be done on developing trust in the Press Council within the media community. Consider improving and internally reforming the current Press Council.
- Consider the possibility of conducting regular and thorough content analyses of online media through the increase of the Press Council's capacity.
- It is necessary for media to report to a greater extent on various social (minority/underprivileged/sensitive) groups, while respecting professional standards and the required expertise and sensitivity. Consider the possibility of obligating public media

services to dedicate a certain percentage of their programs to these topics.

- Consider the possibility of organizing campaigns to motivate companies to advertise as part of their corporate social responsibility within media content that reports on various social (minority/underprivileged/sensitive) groups.
- Consider the possibility of introducing a requirement for sign language in prime-time news programs on nationally broadcasted television channels. Consider the possibility of introducing a requirement for all portals listed in the register to be compatible with “readers” used by visually impaired individuals.
- Encourage people with disabilities to engage in journalism through special programs, in order to create more authentic content for this social group together with journalists.

Media literacy and the fight against misinformation

- Obligate public media services to actively participate in promoting media literacy and the fight against misinformation.
- Obligate public media services to collaborate in this regard with relevant fact-checking organizations, and ensure that the programs they create together are aired during prime-time slots.
- Innovative campaigns are needed to promote media literacy, which will target all groups, including both young people and representatives of the older population.
- Establishing partnerships between media organizations, experts, universities, and

schools within formal media literacy education. A more innovative approach is needed, as two-way, interactive communication is essential in this case. In this education, in addition to teachers and students, guest lecturers, fact-checkers, or journalism students should also participate.

- It is necessary to provide support for informal networking at the academic level between technical and non-technical faculties in order to establish interdisciplinarity in the field of artificial intelligence development and application. This would encourage a greater amount of interdisciplinary research involving artificial intelligence and help identify potential interdisciplinary solutions based on that research.
- Consider the possibility of creating a (self-regulatory) advisory body for combating misinformation, modeled after the World Health Organization’s body established to fight infodemics. It should include experts from various fields who would, among other things, assist journalists in verifying the validity of more complex information.
- In the fight against misinformation, it is necessary to involve the state and its authorities to a limited extent (due to potential abuse), while working on promoting the implementation of global measures and developing self-regulatory mechanisms.

Local and regional media

- Encourage networking programs for local media that share similar values, in order to improve their position in the advertising market, enhance the exchange of experiences and content, and increase their ca-

capacity to participate in domestic and international competitions for grant allocation.

- Consider the possibility of supporting the employment of young journalists in local media and media in minority languages. This support would be based on long-term subsidies for taxes and contributions for employees.
- Consider the possibility of using tax incentives to stimulate advertisers to publish advertising content in local media. This measure exists in some Western countries.
- Subsidizing print media up to a certain circulation for small local print media.
- Due to a lack of resources, local media should consider involving citizens in the actual production of content, not just through providing suggestions. This would further strengthen the connection between local media and the community they serve.
- Local media should consider the option of actively participating in media literacy for the public. One possibility is highlighting misinformation and manipulation, and their deconstruction at the local level.
- Consider the possibility of providing support for the establishment of gathering places for journalists in local communities, which would serve as a mental and spiritual space for communication and contribute to increasing mutual solidarity.

CONCLUSION

The Media Strategy is a comprehensive and important document that contains solutions capable of fundamentally transforming the media landscape, provided it is implemented effectively and in a context where the rule of law prevails. While it does not offer precise answers to newer dilemmas faced by the profession in the context of rapid technological development, it does imply potential paths forward in those areas. Media professionals and experts who participated in the research largely agree with this view, albeit with a repeatedly emphasized assertion that “under current circumstances,” it is almost impossible to imagine these solutions being realized in practice.

Their skepticism is supported by key provisions proposed by the state in the current drafts of the Law on Public Information and Media and the Law on Electronic Media, which are currently under public debate.

These provisions are in sharp contrast to the measures and activities outlined in the Media Strategy, effectively rendering the document meaningless.

The good news is that, in recent years, media associations have demonstrated a commendable capacity to develop media policies in line with international standards and public interest. However, the bad news is that they lack the power to ensure the implementation of these policies in practice. Therefore, it is essential to work on expanding the advocacy platform in the future. This involves increasing the scope and quality of communication to include not only their members but also other media professionals, experts, and representatives of civil society—encompassing not

just think-tank organizations but also various formal and informal initiatives.

Research indicates that there is room to intensify such collaboration. A broader advocacy platform would strengthen the position of associations while also enabling their members—and the public at large—to better understand the importance of media reforms as well as the ideas and actions of these associations during the reform process.

The significant distrust of institutions among respondents, the non-implementation of the Media Strategy, legal provisions that undermine the media landscape, numerous government obstructions, and the benevolence of the international community place associations in a challenging dilemma. How should they proceed? Should they participate in these processes or withdraw from them? What is the alternative?

It is likely that representatives of state authorities would eagerly welcome their withdrawal from the processes, with their positions quickly replaced by representatives of GONGO (government-organized non-governmental organizations). However, on the other hand, how and why should they participate in something that seems, from the outset, like a futile expenditure of energy and resources with a predictable unfavorable outcome?

This question is difficult to answer. The only suggestion is that associations should address it through extensive consultations with their members, media professionals, and experts, as well as representatives of civil society and the general public. We hope this research contributes to this communication and the search for a valid answer.

Detailed results and quantitative analysis, the content of the questionnaire, and the list of focus group and in-depth interview participants can be found in the annexes of the research.

https://lookerstudio.google.com/reporting/4ea0ce1e-0fef-409c-ba28-95d6ad2486e2/page/p_98awxcrs9c



ASOCIJACIJA MEDIJA

Kraljice Natalije 28, Beograd
MB: 1751468
PIB: 103099587
info@asmedi.org



**ASOCIJACIJA
ONLAJN
MEDIJA**

**ASOCIJACIJA ONLAJN
MEDIJA**

Radanska 10, Niš
MB: 28178158
PIB: 109063306



**NEZAVISNO DRUŠTVO
NOVINARA VOJVODINE**

Sutjeska 2, Novi Sad
MB: 08203873
PIB: 102595575
ndnvns@gmail.com



**NEZAVISNO UDRUŽENJE
NOVINARA SRBIJE**

Resavska 28, Beograd
MB: 6975641
PIB: 100065510
nuns@nuns.rs



LOKAL PRES

Dr Zorana Đinđića 8,
Kragujevac
MB: 17393090
PIB: 101042192
lokpres@eunet.rs

**FONDACIJA
SLAVKO
ČURUVIJA
FOUNDATION**



**SLAVKO ČURUVIJA FON-
DACIJA**

Kursulina 7, Beograd
MB: 28827113
PIB: 108306573
office@slavkocuruvijafondacija.rs