

# FACTS AND FIGURES

**POLITICS**  
**POLITICAL PARTIES IN THE GOVERNMENT RESPONSIBLE FOR MEDIA POLICY**

**ALBANIA**

YEAR OF ELECTIONS	2013	2009	2005	2001	1997	1996	1992	1991
<b>RULING PARTY IN THE GOVERNMENT</b>	Socialist Party in coalition with LSI	Democratic Party in coalition with LSI	Democratic Party	Socialist Party	Socialist Party	Democratic Party	Democratic Party	Socialist Party
<b>PROFILE OF THE RULING PARTY IN THE GOVERNMENT</b>	Main left-wing party	Main right-wing party and second largest left-wing party	Main right-wing party	Main left-wing party	Main left-wing party	Main right-wing party	Main right-wing party	Main left-wing party
<b>MINISTER IN THE GOVERNMENT RESPONSIBLE FOR MEDIA POLICY (party affiliation)</b>	Minister of Innovation, Information, and Communication Technologies (Socialist Party - in charge of digital switch-over and frequency plan only)	Minister of Innovation, Information, and Communication Technologies (Democratic Party - in charge of digital switch-over and frequency plan only)	N/A	N/A	Minister of Information (Socialist Party)	N/A	N/A	N/A
<b>PROFILE OF THE PARTY OF THE MINISTER</b>	Main left-wing party	Main right-wing party	N/A	N/A	Main left-wing party	N/A	N/A	N/A

## BOSNIA AND HERZEGOVINA

YEAR OF ELECTIONS	2010	2006	2002	2000	1998	1996
<b>RULING PARTY IN THE GOVERNMENT</b>	SDP, SNSD, SDA (later replaced by SBB), SDS, HDZ, HDZ 1990	SDA, SBIH, SNSD, SDP, HDZ, HDZ 1990, PDP, NS.	SDP, SBIH, SNS, PDP, NHI, later SDA, SDS.	SDA, SBIH, HDZ, SNSD, later SDP, NHI and PDP	SDA, SBIH, HDZ, later SNSD, SP, SNS	SDA, SDS, HDZ
<b>PROFILE OF THE RULING PARTY IN THE GOVERNMENT</b>	Predominantly nationalistic parties; The electorate mostly mono-ethnic, even that of SDP, nominally a socialist and multi-ethnic party; Due to nationalistic rhetoric of SNSD, in 2012 it finally lost the membership in the Socialist International (SI).	Predominantly nationalistic parties; SDP is nominally socialist and multi-ethnic party; Although SNSD emerged as a soft right party, it heavily increased the nationalistic rhetoric, and thus was losing the international support.	Mainly nationalistic parties; SDP is nominally a socialist and multi-ethnic party.	Predominantly nationalistic parties, SDP is nominally socialist and multi-ethnic party, but with mostly mono-ethnic electorate.	Mainly nationalistic parties	Major nationalistic parties; mostly mono-ethnic electorate.
<b>MINISTER IN THE GOVERNMENT RESPONSIBLE FOR MEDIA POLICY (party affiliation)</b>	Minister of Traffic and Communication Damir Hadžić (SDP, since 2012)	Minister of Traffic and Communication Božo Ljubić (2006 to June 2009) Rudo Vidović (since 2009); (HDZ 1990)	Minister for civil affairs and communications Branko Đokić (Jan 2003 - Oct 2006) (PDP)	Minister for civil affairs and communications Tihomir Gligorić (2000-2001) (SNSD) Svetozar Mihačević (2001-2002) (SNS)	Minister for civil affairs and communications Marko Ašanin (SRS, at that time)	Minister for civil affairs and communications Spasoje Albijanić (since the end of 2006)(SDS)
<b>PROFILE OF THE PARTY OF THE MINISTER</b>	SDP, Social democratic party; Nominally a socialist party, but the electorate mainly belonging to the Bosniak ethno-national group.	HDZ 1990 Croatian Democratic Union, nationalistic party; split from HDZ in 2006.	PDP Party of Democratic Progress, conservative party oriented towards the Serb electorate.	SNSD Alliance of Independent Social Democrats, a Serb political party, at that time considered as a soft right party, later engaging nationalist rhetoric. SNS, Serbian Progressive Party.	SRS Serbian Radical Party is far right, nationalistic party, with strong ties with SRS in Serbia, and with Vojislav Šešelj, indicted of war crimes.	SDS The leading, nationalistic Serb party whose political leader, Radovan Karadžić, was at that time already indicted for war crimes.

## CROATIA

YEAR OF ELECTIONS	2011	2007	2003	2000	1995	1992	1990
<b>RULING PARTY IN THE GOVERNMENT</b>	SDP (Social Democratic Party / Kukuriku Coalition); SDP, HNS, IDS, HSU)	HDZ (Croatian Democratic Union)	HDZ (Croatian Democratic Union)	SDP (Social Democratic Party) / Coalition: HSS, IDS, L.S., HNS, HSLs and SDP)	HDZ (Croatian Democratic Union)	HDZ (Croatian Democratic Union)	First pluralist elections but still in Socialist Federative Republic of Yugoslavia HDZ (Croatian Democratic Union)
<b>PROFILE OF THE RULING PARTY IN THE GOVERNMENT</b>	Left center	Right / conservative	Right / conservative	Left center	Right - nationalist	Right - nationalist	Right - nationalist
<b>MINISTER IN THE GOVERNMENT RESPONSIBLE FOR MEDIA POLICY (PARTY AFFILIATION)</b>	Andrea Zlatar Viočić	Božo Biškupić (HDZ) Jasen Mesić (HDZ)	Božo Biškupić (HDZ)	Antun Vujčić (SDP)	Božo Biškupić (HDZ)	Vesna Girardi – Jurkić (HDZ) (1992-1994) Minister of Education, Culture and Sports; Zlatko Vitez (HDZ) (1994-1995)	Vlatko Pavletić (HDZ) Minister of Education, Culture and Sports
<b>PROFILE OF THE PARTY OF THE MINISTER</b>	Center (HNS) Croatian Peoples Party-Liberal Democrats	Right	Right	Left center	Right	Right	Right

## MACEDONIA

YEAR OF ELECTIONS	2011	2008	2006	2002	1998
RULING PARTY IN THE GOVERNMENT	VMRO-DPMNE	VMRO-DPMNE	VMRO-DPMNE	SDSM	VMRO-DPMNE
PROFILE OF THE RULING PARTY IN THE GOVERNMENT	Demo-Christian	Demo-Christian	Demo-Christian	Social-Democrats	Demo-Christian
MINISTER IN THE GOVERNMENT RESPONSIBLE FOR MEDIA POLICY (PARTY AFFILIATION)	VMRO-DPMNE	VMRO-DPMNE	VMRO-DPMNE	DUI (Democratic Union for Integration)	DA (Democratic alternative)
PROFILE OF THE PARTY OF THE MINISTER	Demo-Christian	Demo-Christian	Demo-Christian		Centrist political party rights of Albanians

## SERBIA

YEAR OF ELECTIONS	2012	2008	2007	2003	2000	1997	1993	1992	1990
RULING PARTY IN THE GOVERNMENT	SPS+SNS+URS	DS+SPS+G17	D8S+DS+G17+NS	D8S+G17+SPO+NS	DOS	SPS+SRS+JUL	SPS+ND	SPS	SPS
PROFILE OF THE RULING PARTY IN THE GOVERNMENT	Populist + socialist + liberal	Democratic + socialist + liberal	National – democratic + liberal	National – democratic + liberal + conservative	Democratic	Nationalist	Nationalist	Nationalist	Nationalist
MINISTER IN THE GOVERNMENT RESPONSIBLE FOR MEDIA POLICY (PARTY AFFILIATION)	SNS	G17	DS	SPO	DS	SNS	SPS/JUL	SPS	SPS
PROFILE OF THE PARTY OF THE MINISTER	Liberal (re-formed-nationalist)	Liberal	Democratic	Conservative	Democratic	Nationalist	Nationalist	Nationalist	Nationalist
		Bratislav Petković	Voja Brajović	Dragan Kojadnović	Branislav Lečić	Aleksandar Vučić	Ratomir Vico / Aleksandar Tijanić / Radmila Milentijević	Milivoje Pavlović	Ratomir Vico

## LAW

### FACTS ABOUT MEDIA LEGISLATION RELEVANT FOR MEDIA INTEGRITY

#### ALBANIA

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
TRANSPARENCY RULES FOR ALL MEDIA (MEDIA REGISTER, PUBLISHED REPORTS ETC.)	PARTIALLY	The ownership should be reported to the regulator and to the National Center of Registration. Annual financial reports are submitted to the tax office and to the regulator; but media are not required to make ownership or finances public in a more general sense.	The latest law on audio-visual media was approved in March 2013 (Law 97/2013) and the regulator is still drafting complementary regulations, including rules on transparency. It is still too early to make conclusions regarding the trend.	The National Center of Registration can be accessed online, offering information on companies' ownership history. However, there is no official attempt to verify the real owners of the media and to offer transparency on media finances.
SPECIFIC TRANSPARENCY RULES FOR PSB	PARTIALLY	The PSB drafts annual reports to the parliament, including information on the financial operations (Law 97/2013, Article 102). There are no transparency rules regarding the decisions of Steering Council or those of other bodies.	This has not changed over the years.	Annual reports have detailed budget entries, comparing trends over the years. However, although the public can request such information, there is no pro-active approach in offering them.
TRANSPARENCY RULES FOR MEDIA REGULATOR(S)	YES	The regulator should publish on its website part or all of its expenses and revenues (Law 97/2013, Article 102). Until April 2013 it was obliged to publish its decisions online and in the Official Gazette, but this is no longer requested by the new law. The law specifies though that the regulator should conduct public consultations on major strategies and decisions, online and offline (Law 97/2013, Articles 21, 48, 53). The regulator also submits annual reports to the Parliament (Law 97/2013, Article 28).	The new law added further obligations regarding transparency of finances and of consultation process, further reinforcing the requirements stipulated by the previous legislation. However, the new law has omitted the obligation to publish the council decisions online and in the Official Gazette.	It is too early to see whether these requirements will be respected. So far the regulator has published its decisions online and in the Gazette, in the form of notifications, rather than full texts. Annual reports have been published online, though those for the last two years are not available anymore, or had been online only for a short period of time.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
ANTI-CONCENTRATION RULES	YES	The Law no. 9121 on Competition Protection applies to all commercial organisations, including media companies. Article 62 of the Law 97/2013, has specific regulations on media concentration: Not exceeding 40% ownership in a media with a national licence. The owner of a company with a national licence cannot own more than 20% of another company that owns a local or national licence. No exceeding 30% of advertising market.	The new law added the restriction on advertising market.	Formally, these rules have been observed. However, there have been ongoing speculations about hidden ownership.
GROSS-OWNERSHIP RULES	PARTIALLY	No more than two local licences, one audio and one audio-visual (Law 97/2013, Art.62).	Print and audio-visual media cross-ownership has always been allowed.	Formally, these rules have been observed. However, there have been ongoing speculations about hidden ownership.
BAN/RESTRICTIONS OF MEDIA OWNERSHIP FOR POLITICIANS	NO	The Law 97/2013 does not specify this. However, the complementary regulation by the authority is still under discussion.	Previous legislation banned ownership of electronic media by political parties or politicians.	Formally these rules have been respected, but links between owners and politicians have been subject of speculations.
BARRIERS/THRESHOLDS FOR FOREIGN OWNERSHIP IN THE MEDIA	NO	The Law 97/2013 or any other related laws do not specify any limits to foreign ownership in the media.	The same criteria as for domestic owners apply.	Foreign ownership has been scarce and limited.
SEPARATE ANTI-MONOPOLY BODY FOR MEDIA INDUSTRY	NO			
GENERAL ANTI-MONOPOLY BODY IN CHARGE OF MEDIA CONCENTRATION	YES	The Authority for Protection of Competition is in charge of all cases related to competition, although no special rules are envisaged for media.	The Law 9121 on Competition Protection was approved in 2003 and there has been no new regulation issued.	In practice there have been no cases of intervention from the Authority in the media field.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
<p><b>CONFLICT OF INTEREST RULES FOR MEMBERSHIP IN REGULATORY BODIES</b></p>	<p>YES</p>	<p>They cannot be:</p> <ul style="list-style-type: none"> <li>- members of political parties and associations;</li> <li>- candidates for MP or MP in the last two parliamentary terms;</li> <li>- candidates for local government units in last elections or Mayors;</li> <li>- members of Council of Ministers or prefects for the last three years;</li> <li>- members of the Council of Complaint or AKEP (including employees);</li> <li>- owners of shares in commercial associations related to audio-visual media, advertisement, content production, electronic communication networks, members of directing or advisory bodies to these associations.</li> </ul> <p>Members of a regulator should declare any interest they have in subjects licenced by the regulator or applications for licence, and should not participate in the discussions on these licences. Regulator members cannot make public political statements that affect their objectivity. Members of the regulator should be free from political or financial influence (Law 97/2013, Article 7).</p>	<p>Conflict of interest rules have always been present in legislation. In 2006 the regulator also adopted an internal regulation on conflict of interest, in the framework of a general attempt to regulate conflict of interest in public administration.</p>	<p>There have been no public cases of conflict of interest for members of regulatory bodies.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR GOVERNING BODIES OF PSB	YES	<p>They cannot be:</p> <ul style="list-style-type: none"> <li>- members of political parties and associations;</li> <li>- candidates for MP or MP in the last two parliamentary terms;</li> <li>- candidates for local government units in last elections or mayors;</li> <li>- members of Council of Ministers or prefects for the last three years;</li> <li>- members of the Council of Complaint or AKEP (including employees);</li> <li>- owners of shares in commercial associations related to audio-visual media, advertisement, content production, electronic communication networks, members of directing or advisory bodies to these associations.</li> </ul> <p>Members of Steering Council should declare any interest they have in subjects RTSH will work with or contracts RTSH will engage in and they should not participate in the discussions on these licences (Law 97/2013, Article 97).</p>	Such rules have been present, but the new law brought further restrictions.	There have been no public cases of conflict of interest for governing bodies of PSB.
CONFLICT OF INTEREST RULES FOR MANAGEMENT OF PSB	YES	<p>General Director cannot be:</p> <ul style="list-style-type: none"> <li>- member of political parties and associations;</li> <li>- candidate for MP or MP in the last two parliamentary terms;</li> <li>- candidate for local government units in last elections or Mayor;</li> <li>- member of Council of Ministers or prefect for the last three years;</li> <li>- member of the Council of Complaint or AKEP (including employees);</li> <li>- owner of shares in commercial associations related to audio-visual media, advertisement, content production, electronic communication networks, members of directing or advisory bodies to these associations;</li> <li>- employed in other position during the term (Law 97/2013, Article 104).</li> </ul>	Such rules have been present, but the new law brought further restrictions.	There have been no public cases of conflict of interest for management of PSB.

DE JURE - RULES	DETAILS		TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
	YES / NO / PARTIALLY			
CONFLICT OF INTEREST RULES FOR TOP MANAGEMENT POSITION IN A REGULATOR	NO	The same rules as for the other members apply.		There have been no public cases of conflict of interest for chairman of regulator.
CONFLICT OF INTEREST RULES FOR MEMBERS OF DECISION MAKING BODY ON MEDIA SUBSIDIES	N/A			There is no regulation and no decision making body for media subsidies.
MERIT SYSTEM FOR NOMINATION AND APPOINTMENT OF MEMBERS OF A REGULATORY BODY	YES	No less than 10 years of experience in the areas of media, broadcasting, content, media technology, competition, Albanian language development, art, vulnerable groups, law, technological development, consumer protection (Law 97/2013, Article 8).	The merit system has been more or less the same, the nomination process has varied.	Although the members appointed have had their merits, the main criteria for appointing them have been political decisions of MPs, rather than professional skills, following the formula.
MERIT SYSTEM FOR NOMINATION OF MEMBERS OF PSB GOVERNING BODIES	YES	No less than 10 years of experience in the areas of media, broadcasting, content, media technology, competition, Albanian language development, art, vulnerable groups, law, technological development, consumer protection (Law 97/2013, Article 93).	The merit system has been more or less the same, the nomination process has varied.	Although the members appointed so far had their merits, the main criteria for their appointment has been political decision of MPs, rather than professional skills required in the law.
BAN OF POLITICAL PROPAGANDA OUTSIDE ELECTION PERIOD	YES	Media should refrain from political bias when reporting on politics (Law 97/2013, Article 46). Broadcasting sub-regulation is pending.	According to law, political propaganda has been always banned.	Although open propaganda is missing, the quality of reporting, the news agenda and the selection and tone of coverage show that one media prefers one political wing over another.
OBLIGATION OF FAIR AND BALANCED REPORTING	YES	Obligations of accuracy, objectiveness, and fairness in news reporting and public interest issues (Law 97/2013, Article 46).	This obligation has been present in all legal drafts and amendments.	In general, mainstream media have been balanced in their reporting, although nuances of bias have been noticed, especially during electoral campaigns.
EDITORIAL INDEPENDENCE RULES FOR PRIVATE MEDIA	PARTIALLY	Media should refrain from political bias when reporting on politics (Law 97/2013, Article 46).	Previous regulation stated that editorial independence is guaranteed by the law for all media. Such provision is missing in the current legislation (regulating audio-visual media), approved in March 2013.	Although the regulation guaranteed editorial independence, this provision has not been observed by creating other mechanisms that would assist independence. Media independence has been constantly doubted.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
EDITORIAL INDEPENDENCE RULES FOR PSB	PARTIALLY	PSBs should refrain from bias in the coverage of news events (Law 97/2013, Article 91).	Previous regulation stated that editorial independence is guaranteed by the law for all media. Such provision is missing in the current legislation (regulating audio-visual media), approved in March 2013.	The law used to guarantee editorial independence for all media, but in practice, the main accusation against PSB over the years has been lack of independence, no matter who was in power.
JOURNALISTS' AUTONOMY - CONSCIENCE CLAUSE	NO		This has never been part of the work contracts of journalists.	When there are contracts they refer to general work conditions, not to content or editorial independence.
JOURNALISTS' OPINION ON APPOINTMENTS AND DISMISSALS OF EDITORS IS REQUESTED	NO		This has never been part of legislation or internal practice in the newsrooms.	In practice, journalists have no influence on appointments and dismissal of editors.
LEGAL OBLIGATION FOR EMPLOYERS TO SIGN COLLECTIVE CONTRACTS ON LABOUR RIGHTS IN THE MEDIA	NO		The Code of Labour obliges all employers to have contracts with employees, but not necessarily collective agreements as well. There is no specific labour requirement for media organisations.	Collective contracts in the media have not been signed so far.

## BOSNIA AND HERZEGOVINA

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
TRANSPARENCY RULES FOR ALL MEDIA (MEDIA REGISTER, PUBLISHED REPORTS ETC.)	PARTIALLY	<p>In the Broadcasting sector there are three relevant rules (Rule 55/2011, 58/2011, and Rule 34/2008) which stipulate registering of the ownership structure of licenced broadcasters.</p> <p>There are no specific rules on registration of online and print media, except local court registries for all businesses.</p>	<p>The Communication Regulatory Agency (CRA) is now in the process of amending the Rule 34/2008 on establishing and maintaining unique register of licences, to adapt to technological developments and gather new information on the market of electronic communication.</p> <p>Press Council is now advocating for print and online media to publish information about the management and contact information, which is not practice among online media platforms at the moment.</p>	<p>Communication Regulatory Agency collects and publishes the data on the directors and editors in chief of broadcasting media.</p> <p>Major print media do publish information on the personnel and management, but they lack transparency on the business indicators and sources of revenues.</p> <p>Websites of the media often do not contain information on the ownership.</p> <p>Online media often do not exercise a minimum of the transparency. Some online media are not registered as business subjects. Many of them neither publish the information on ownership and management nor the contact information on their websites.</p> <p>Parts of information on ownership structure are available in 15 different court registries.</p> <p>The online register of businesses provides information on initial capital and founders of businesses in FBiH.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
SPECIFIC TRANSPARENCY RULES FOR PSB	YES	For PSB additional obligation is to publish annual reports. Audit reports are also provided (as stipulated in the Law on Public RTV system BiH, the Law on Public RTV service BiH, the Law on RTV FBiH, the Law on RTRS, and the Rule 57/2011 on public RTV broadcasters).	No major effort has been made over the years to increase transparency of PSB.	Annual reports of three broadcasters have not always been easily accessible. However, financial and business reports of RTRS for years 2008-2012 are available at RTRS website, as well as (since recently) reports of BHRT for 2010-2012, and reports for RTVFBiH for 2007-2012, at their respective websites. The audit office gave a negative mark for business performance of RTVFBiH in the period 2009-2011, but the management of RTV FBiH have been stressing out that both the financial performance and the viewership is enhancing over the past several years. These audits are not fostering positive changes in PSBS.
TRANSPARENCY RULES FOR MEDIA REGULATOR(S)	YES	The Law on Communications proscribes transparency in the procedures of appointing CRA officials, developing regulations, reaching decisions upon complaints, etc. As stipulated in the Article 45, the CRA submits the yearly financial and activities report. Freedom of Information Act stipulates that as a public institution, the CRA is also obliged to reply to requests for information.	There have been no major critiques of the CRA's transparency. CRA is obligated by the law to publish the documents, annual reports, draft rules etc. Publishing on the website is not specifically required.	The CRA publishes yearly reports on their functioning at their websites, and seems to be generally acting in accordance with the laws and regulations in terms of transparency. In the context of this research, CRA officials provided all requested information, as stipulated by the Freedom of Information Act.
ANTI-CONCENTRATION RULES	NO	The concentration of ownership in media sector has not been regulated at all for several years.	Previous anti-concentration regulations were under the jurisdiction of the CRA. In past few years, the CRA has been advocating for development of concentration rules that would pertain to the media sector as a whole. However, so far no significant interest has been demonstrated by the relevant institutions, including the Council of Competition.	Few media actors are holding significant ownership share, but no major concentration has been reported so far. Still, lack of regulations, along with the possibility that real owners might not be officially registered as owners, makes the concentration of ownership an open risk.
CROSS-OWNERSHIP RULES	NO		Ibid.	

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
BAN/RESTRICTIONS OF MEDIA OWNERSHIP FOR POLITICIANS	PARTIALLY	The Law on conflict of interest in the government institutions of BiH (Article 4) stipulates that any engagement in private business, "under circumstances that create a conflict of interest"; is incompatible with the public duties of the elected official, executive officeholder or adviser; these functions are also incompatible with the membership in the supervisory, managerial, executive boards, as well as the position of authorized person within public companies (ibid) – which includes public media. The Rule 57/2011 on public radio and TV stations pertains only to the positions of editor-in-chief, director and member of editorial board of a public media, who cannot simultaneously hold public office, while it does not affect media owners.	Given that the media ownership is mainly unregulated since 2006, media ownership by politicians is an imminent risk; it is also unclear which "circumstances" constitute conflict of interest in the Article 4.	Dnevni avaz, one of the major dailies was owned by Fahrudin Radončić, leader of the Alliance for Better Future (SBB). Just before he was appointed the Minister of Security of BiH, in order to avoid possible accusations of conflict of interest (as stipulated by the Law), he transferred ownership to his (since then) ex-wife, Azra Radončić, in July 2012.
BARRIERS/THRESHOLDS FOR FOREIGN OWNERSHIP IN THE MEDIA	YES	As stipulated by the Law on the policy of foreign direct investments of BiH, foreign investments in an enterprise dealing with, inter alia, public information (including radio, TV, print and electronic media), shall not exceed 49% of capital of that business (Article 4).	No identifiable trends.	These stipulations can be surpassed in cases of indirect ownership, i.e. if a company registered in BiH is the owner of a media outlet (e.g. Al Jazeera Balkans, OBN).
SEPARATE ANTI-MONOPOLY BODY FOR MEDIA INDUSTRY	NO			
GENERAL ANTI-MONOPOLY BODY IN CHARGE OF MEDIA CONCENTRATION	YES	The Council of Competition of BiH decides on the prohibited competition activities in the market, including concentration, as stipulated by the general Competition Act (especially Article 12). However, no specific rules and jurisdiction over media concentration is in place.	The trends are worrying since the relevant institutions did not show interest in developing regulation on media concentration. The Council of Competition does not systematically deal with media sector, but reacts if specific cases of prohibited competition and concentration are reported.	So far there were no prominent cases processed by the Council of Competition, related to media sector. We did not identify any decision of the Council of Competition related to media concentration.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR MEMBERSHIP IN REGULATORY BODIES	YES	<p>The Law on Communications (Article 39) stipulates that: Officials in legislative and executive functions at any level of government, or members of political party organs cannot be candidates for the membership in the Council of the CRA.</p> <p>A member of the CRA Council should declare any interest related to a telecommunications operator or a broadcaster, and should recuse himself/herself in cases representing a conflict of interest.</p>	<p>The process of appointment of the Council members has been hindered and politically manipulated for years without any sanctions. In 2012, an amendment to the Law on communications was adopted, potentially investing more power in the Council of Ministers to influence the process.</p> <p>It seems that the formulation “cases representing a conflict of interests” in the Article 39 is overly broad, allowing questionable interpretations.</p>	<p>Over several years, the procedure of appointing the members of CRA Council has been hindered, which was interpreted as a political pressure on the CRA.</p> <p>Among the members of the Council which were appointed by the end of 2013, some are considered to have close political affiliations.</p>
CONFLICT OF INTEREST RULES FOR GOVERNING BODIES OF PSB	YES	<p>The Law on Public RTV service BiH, the Law on RTV FBiH and the Law on RTRS stipulate that the members of the Board of Governors of a PSB cannot be performing functions in legislative, executive and judicial government, on any level, and cannot hold membership in political party organs.</p> <p>The Rule 57/2011 on public radio and TV broadcasters stipulates that members of Editorial council cannot be appointed public officials (Article 10). The members are obliged to submit to the Agency a statement confirming their non-affiliation to political institutions.</p>	<p>No major changes were made in the regulation of this area. The rules are in place, but even if they are formally respected, it is generally believed that the governing bodies are not independent from the political influences.</p> <p>The worrying trend is that the CRA, which is already excluded from the process of appointing the Board of Governors of RTV FBiH, was also left out by the recent amendments to the Law on RTRS in 2013.</p> <p>Marginalisation of the CRA's role in the process may lead to more political reckoning in appointing the managerial board, and to less transparent procedures.</p>	<p>There are no reports on violation of the rule. Still, there are doubts regarding affiliations between the members of the PSB Councils and political parties in power.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR MANAGEMENT OF PSB	YES	The Rule 57/2011 (Article 10), as well as the Law on Public RTV service BiH, the Law on RTV FBiH and the Law on RT RS involve stipulations that editor in chief and director cannot be appointed officials, party officials or representatives of organisations linked to a political party. The director general also cannot be a (co) owner of a broadcaster. Rules pertaining to other management and editorial positions are possible, but not obligatory, and are in domain of the Statutes of individual public media.	No major changes in this regard were made over the years. The legislation is solid, but the implementation remains questionable.	There is no procedural evidence on violation of this rule, but media continuously expressed and reported on speculations about unofficial political affiliations of the PSB management and editors.
CONFLICT OF INTEREST RULES FOR TOP MANAGEMENT POSITION IN A REGULATOR	PARTIALLY. Specifically for director general	As stipulated by the Law on Communications of BiH, the candidates for director general cannot be officials in legislative or executive functions at any level of government, cannot be members of political party organs, or have any financial relations with the telecommunications operators or broadcasters (Article 40). Some provisions are included in the internal Code of Conduct of CRA, and the general provisions of conflict of interests also apply.	There were no major reports on the violation of these norms.	The whole procedure of appointing director general of the CRA has been stalled for several years. On 13 February 2014, CRA made a decision to publish a call for appointment of the new director.
CONFLICT OF INTEREST RULES FOR MEMBERS OF DECISION MAKING BODY ON MEDIA SUBSIDIES	N/A	There are no specific decision-making bodies on media subsidies; the decisions are made by the officials at different levels of government.	This area remains largely unregulated.	There are doubts about the transparency of and criteria for allocation of funds to media, which are being provided at different governmental levels.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
MERIT SYSTEM FOR NOMINATION OF MEMBERS OF A REGULATORY BODY	YES	<p>The Law on Communications stipulates the merit system for members of the CRA Council and the director general. Candidates for director general need to have relevant experience in the telecommunication and/or broadcasting sector, and management skills.</p> <p>Candidates for members of the CRA Council need to fulfill the following conditions:</p> <ul style="list-style-type: none"> <li>a) BiH citizenship;</li> <li>b) University degree, technical or social sciences;</li> <li>c) Minimum of five years' experience in posts within the jurisdiction of the Agency;</li> <li>d) Knowledgeable on the issues of business and broadcasting aspects of public and commercial broadcasting media; and</li> <li>e) Experience in telecommunications and broadcasting.</li> </ul>	<p>Amendments to the Law on Communications was adopted in the second reading in the Parliamentary Assembly on 4 December 2012, raising concerns that it will give more power to the Council of Ministers in appointing members of the CRA Council. The Parliamentary Assembly is supposed to establish an ad hoc body, envisaged to propose the members of the CRA Council. The procedure for appointment and composition of the ad hoc body is not precisely defined. The list of candidates is first sent to the Council of Ministers (whose role is not elaborated) and then subject to the parliamentary approval.</p> <p>Despite engagement of professionals, there are suspicions that the majority of current ad hoc body members are affiliated to the leading political parties.</p>	<p>In the past years, the Parliament of BiH has been blocking the appointment of the director general, and the members of the CRA Council, presumably due to political calculations, thus hindering implementation of the merit system. The media have been reporting that the political parties were unofficially negotiating the future appointment of the director general, taking into account primarily ethnic principle.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
MERIT SYSTEM FOR NOMINATION OF MEMBERS OF PSB GOVERNING BODIES	PARTIALLY	There are no specific criteria stipulated by the laws and binding government decisions with regard to appointment of Board of Governors. The Law on Public RTV service BiH, the Law on RTV FBiH and the Law on RTRS stipulate that the "most qualified candidates" should be selected. In addition, the relevant laws on ministerial and other appointments (for both state and entity level) stipulate that the criteria are established when conducting a selection procedure, and that the criteria should correspond to the needs of the body in question. Therefore the criteria are not firmly established, but depend on the interpretation of the body that is conducting the procedure. Such interpretation could be questionable especially given that a body within the Parliament FBiH (for RTVFBiH) and, since recently, a body within the National Assembly of RS (for RTRS) are conducting the procedure.	There have been continuous doubts about the way members of the governing boards are being selected. Members of the Governing Boards are perceived to be rather politically suitable than competent individuals contributing to the performance of PSB.	In practice, for example, the recent call for appointment in the Board of Governors of RTRS set the "specific" criteria (published on 4 November 2013): higher education, expert knowledge in the field of appointment, at least five years of work experience, familiarity with the content and the manner of functioning of the managerial body. Relatively recently, the initiative of the Parliament of Federation of BiH to appoint an Interim Board during 2012, which was made in haste and contrary to legal procedures, was perceived as an attempt to re-establish the political control over this broadcaster.
BAN OF POLITICAL PROPAGANDA OUTSIDE ELECTION PERIOD	PARTIALLY, for PSB only	The Law on Public RTV service BiH (Article 32), the Law on RTV FBiH (Article 46) and the Law on RTRS (Article 30) prohibit propaganda messages of political parties and candidates, except in the period of the official election campaign, as regulated by the Election Law of BiH and the rules of BiH Election Commission.	It is difficult to detect the trends in this regard, given that practically there is no continuous monitoring of the political propaganda.	Although there are not many reliable continuous content analysis (beyond election period), there are claims that certain media continuously act as PR services of certain political actors (for example Dnevni avaz as an advocate for SBB, and RTRS for SNSD).

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
OBLIGATION OF FAIR AND BALANCED REPORTING	YES	There are stipulations within the Code on Audiovisual and Radio Media Services, the Code for Press and Online Media, as well as within the laws and rules pertaining to public broadcasters.	It is difficult to identify trends in terms of implementation of these provisions, given that there is no systematic monitoring of the media content.	Violations of these norms occur in practice, but there is a system of regulation and self-regulation that addresses this problem. The CRA has the executive competence regarding violations of such norms in broadcasting sector. On the other hand, the implementation of the decisions of Press Councils depends on the voluntary acceptance of media outlets.
EDITORIAL INDEPENDENCE RULES FOR PRIVATE MEDIA	NO	There are no provisions dealing directly with the editorial independence in private media.		Representatives of the CRA state that the regulations enable maximum editorial independence.
EDITORIAL INDEPENDENCE RULES FOR PSB	YES	The Rule 57/2011 on public radio and television broadcasters; the Law on Public RTV service BiH, the Law on RTV FBiH, the Law on RTRK and the Statute of RTV BiH all stipulate editorial independence.		Despite the regulations, the reports on situation in the media sector express serious doubts about editorial independence of PBS.
JOURNALISTS' AUTONOMY - CONSCIENCE CLAUSE	NO			
JOURNALISTS' OPINION ON APPOINTMENTS AND DISMISSALS OF EDITORS IS REQUESTED	NO			
LEGAL OBLIGATION FOR EMPLOYERS TO SIGN COLLECTIVE CONTRACTS ON LABOUR RIGHTS IN THE MEDIA	PARTIALLY	The general collective agreement (existing on the level of FBiH and RS) is binding for all employers, including media sector, and it defines the basic principles of labour relations, such as signing the agreement, providing the salary, etc. Separate collective agreements pertaining to the media industry are also signed at the entity level. Particular collective agreements, on the level of individual media, are signed in some media outlets, specifying in more detail the rights of employees and the labour relations.	As stated at the website of the Trade Union of RS (webpage of Trade Union of Media and Graphics) the latest collective contract at the level of industry is adopted in 2006, providing the workers within the sector with 'considerably better rights'. It is also stated that by 2000 already 50% of the media had signed the particular collective agreements.	If the employees are not organized into trade unions, the employer is not obliged to sign and respect particular collective agreement, which means that many media are left out of these trends. Additionally, the available reports suggest that the labour rights are often violated, above of all the stipulations related to the salaries, working hours and vacation.

## CROATIA

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
<p><b>TRANSPARENCY RULES FOR ALL MEDIA (MEDIA REGISTER, PUBLISHED REPORTS ETC.)</b></p>	<p>YES</p>	<p>The Media Act (Article 14) – Annual report by all media outlets, including ownership structure, financial results, data on average listenership/readership/viewership shall be published in the media.</p> <p>The Media Act (Article 32) – Ownership data shall be published in the Official Gazette by 28 February every year.</p> <p>The Media Act (Art. 34) – Data on business results including: total income, average circulation, average readership/listenership/viewership in the past year – shall be published in own media by 30 April every year.</p> <p>The Media Act (Article 12) – Obligation of print outlets and distributors to register and provide data to the Croatian Chamber of Economy (CCE). The data collected include: annual reports on ownership structure (Article 32) and financial results (Article 34); obligation of distributors to submit financial reports (Article 38).</p> <p>Electronic Media Act (Article 52) – Media outlets are obliged to provide to the Electronic Media Council the data on media ownership shares until 31 January every year. The same data has to be published in the Official Gazette.</p>	<p>Reinforcement.</p> <p>In 2011, the Media Act was amended banning any type of concealment of ownership structure.</p>	<p>Not implemented properly. Data are not easily available/searchable.</p> <p>If some of the data required exists on the websites – it is unstandardized, incomplete and not easy to found.</p> <p>In addition, data on specific media outlets are presented more as a kind of advertising than reliable facts. The regulators should define a standardized form that would be easy to access via the websites of the media.</p> <p>Not properly defined categories of data collection.</p> <p>It is unclear to what extent the regulator controls this.</p> <p>It is also unclear why the Croatian Chamber of Economy was designated to collect the data on print media.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
SPECIFIC TRANSPARENCY RULES FOR PSB	YES	<p>The Croatian Radiotelevision Act (Article 13) – The Contract (consisting of program obligations and financial plan) between public service broadcaster HRT and the Croatian Government has to be published on the internet site of HRT, as well as the annual working plan and financial plan.</p> <p>The Croatian Radiotelevision Act (Article 26) – Annual reports of the Council of HRT have to be published on the internet site of HRT.</p> <p>HRT is obliged to report to external institutions such as the Croatian Parliament and the Electronic Media Council.</p> <p>The Croatian Radiotelevision Act (Article 41) – The Statute of HRT has to be published on the internet site and in the Official Gazette.</p> <p>The Croatian Radiotelevision Act (Article 11) – The General Terms and Conditions has to be published on the internet site.</p> <p>The Right to Access Information Act obliges all public institutions to make their activities and data available to the public via their internet sites and upon individual request.</p>	Reinforcement.	The first five year contract was signed this year (2013–2017). The process of restructuring has not been set in motion properly.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
TRANSPARENCY RULES FOR MEDIA REGULATOR(S)	YES	<p>The Electronic Media Act (Article 19) – The Electronic Media Council is obliged to publish the list of electronic media with concession on their website.</p> <p>The Electronic Media Act (Article 23) – The Electronic Media Council is obliged to publish the program principles on which the concession is based on their internet site.</p> <p>The Electronic Media Act (Article 64) – The Electronic Media Council is obliged to publish the list of the media outlets financed through the Fund for Promotion of Pluralism and Diversity (including the name of a media outlet, program and content and their reports) on its internet site.</p> <p>The Electronic Media Act (Article 67) – The Electronic Media Council is obliged to publish its annual report and to submit it to the Croatian Parliament.</p> <p>The Electronic Communications Act (Article 14) – Registers and databases, documents, public tenders, statistics, annual program of work, annual financial plan, annual report of activities – which all have to be publicly available and frequently updated on the internet site of the Croatian Post and Electronic Communications Agency.</p> <p>The annual report on the activities and decisions that have significant influence on specific markets also have to be published in the Official Gazette.</p> <p>The Law on Audiovisual Activities (Article 9) – The Supervisory Board is obliged to submit annual reports to the Ministry of Culture.</p> <p>The Law on the Right of Access to Information obliges all public institutions to make their activities and data available to the public via their internet sites and upon individual request.</p>	No change.	<p>The work of the Electronic Media Council – that holds considerable power and manages a substantial budget – has been non-transparent for long period. It has not ensured that legislative stipulations are implemented in practice.</p> <p>The Croatian Chamber of Economy with its nontransparent mode of conduct is hidden from the public eye.</p> <p>It is not stipulated where they should publish the annual report specified in the Article 67 of the Electronic Communications Act.</p> <p>The area of electronic communications is under the purview of the Ministry of Maritime Affairs, Transport and Infrastructure (in charge of technical aspects of electronic communication networks and services, and the maintenance and development of electronic communication infrastructure such as the radiofrequency spectrum and digitalisation process).</p> <p>There are no specific stipulations that would ensure transparency of activities of the Croatian Chamber of Economy and the Croatian Audiovisual Center.</p> <p>However, information on their operations can be (de jure) accessed through application of the Law on the Right of Access to Information.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
ANTI-CONCENTRATION RULES	YES	<p>The Competition Act applies to all market players including media organisations.</p> <p>The Media Act (Article 35) stipulates the protection of market competition that applies to all media.</p> <p>The Media Act (Article 36) stipulates that the media are obliged to declare their intention to merge to the Croatian Competition Agency.</p> <p>The Media Act (Article 37) restricts media concentration for press media outlets if the market share exceeds more than 40% of the total sold copies in Croatia.</p> <p>The Electronic Communication Act (Article 68) stipulates that electronic communication operators must notify the Croatian Competition Agency on intention to merge.</p> <p>The Electronic Media Act (Article 53) defines the meaning of 'linked persons' as individuals connected through family and marriage, or as shareholders; individuals connected through marketing contracts, members of various supervisory boards. According to the Article 55 these 'linked persons' are taken into consideration in the estimation of media concentration.</p>	No change.	The Croatian media market is highly concentrated.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CROSS-OWNERSHIP RULES	YES	<p>The Electronic Media Act restricts cross-media ownership on different levels.</p> <p>Article 54 establishes restrictions for cross-media ownership for a television and radio outlet operating on national level if:</p> <ul style="list-style-type: none"> <li>- it holds more than 25% of shares in a media outlet on any other regional, county or municipal level;</li> <li>- it holds more than 10% shares in a media outlet publishing daily newspaper with more than 3,000 copies;</li> <li>- it holds more than 10% share of a press agency;</li> <li>- it simultaneously publishes a daily newspaper with more than 3,000 copies.</li> </ul> <p>It also restricts cross-media ownership for television and radio outlets operating on a local or regional level if:</p> <ul style="list-style-type: none"> <li>- it holds more than 30% shares in a media outlet operating in the same local or regional market;</li> <li>- if it simultaneously publishes a daily newspaper of local importance in the same or neighboring area;</li> </ul> <p>It also restricts cross-media ownership for satellite, internet or cable operator that:</p> <ul style="list-style-type: none"> <li>- it simultaneously publishes a daily newspaper with more than 3,000 copies;</li> <li>- it holds more than 10% of shares in a media outlet that publishes a daily newspaper with more than 3,000 copies.</li> </ul> <p>The Electronic Media Act (Article 60) prevents legal entities holding more than 10% of shares of advertising agencies from holding shares in television or radio outlets.</p> <p>The Electronic Media Act (Article 57) stipulates that all changes in the ownership structure have to be reported to the Electronic Media Council.</p>	No change.	
BAN/RESTRICTIONS OF MEDIA OWNERSHIP FOR POLITICIANS	PARTIALLY		No change.	<p>It is regulated indirectly through the Prevention of Conflict of Interests Act: any engagement of public officials creating conflict of interest is banned.</p> <p>The Prevention of Conflict of Interests Act (Article 16) stipulates that a public official holding more than 0,5% shares in a company shall transfer his/her rights in the company to another person or a special body, while on duty.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
BARRIERS/THRESHOLDS FOR FOREIGN OWNERSHIP IN THE MEDIA	NO		Relaxation. The Media Act was amended in 2013. It introduced relaxation of barriers for foreign owners based in the EU – in terms of the possibility to register the media outlet in Croatia without having their headquarter or permanent address in Croatia (as a result of EU membership).	The same treatment as Croatian citizens.
SEPARATE ANTI-MONOPOLY BODY FOR MEDIA INDUSTRY	NO			
GENERAL ANTI-MONOPOLY BODY IN CHARGE OF MEDIA CONCENTRATION	YES	It is the Croatian Competition Agency. This area is regulated by the Competition Act.	No change.	
CONFLICT OF INTEREST RULES FOR MEMBERSHIP IN REGULATORY BODIES	YES	The Electronic Media Act (Article 68) stipulates that the following persons shall not be appointed for members of the Electronic Media Council: officials of political parties, state officials, officials in the executive or judicial authorities, persons involved in ownership, management or supervision of the media outlets that are regulated by the Electronic Media Act, persons performing tasks which could lead to a conflict of interests. The Electronic Communication Act (Article 8) stipulates that that following persons shall not be appointed for members of the Croatian Postal and Electronic Communication Agency: state officials; officials of political parties; persons involved in ownership, management or supervision, or connected to legal entities regulated by the Electronic Communication Act; or persons performing tasks which could lead to a conflict of interests. The Prevention of Conflict of Interest Act (2013) should also be applied.	Reinforcement.	Non-transparent. Conflict of interest is recently regulated by the Prevention of Conflict of Interest Act (2013), but the implementation is still lacking.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR GOVERNING BODIES OF PSB	YES	The Croatian Radiotelevision Act (Article 25) stipulates that members of the Council cannot be state officials, officials of political parties, and of local or regional authorities, persons connected to other competing legal entities or persons performing tasks which could lead to a conflict of interests. The Prevention of Conflict of Interest Act (2013) also should be applied.	Reinforcement.	
CONFLICT OF INTEREST RULES FOR MANAGEMENT OF PSB	YES	The Croatian Radiotelevision Act (Article 20) stipulates that director and editors in chief cannot be at the same time members of the state authority bodies, bodies of local or regional authorities and political party organs. The Prevention of Conflict of Interest Act (2013) also should be applied.	Reinforcement.	The current director of HRT was accused of conflict of interest due to the fact that he did not declare all his assets. In his defense he claimed that the position of the director of PSB was not a position of public official. These arguments were refused by the Committee for Conflict of Interests. However, the director did not offer his resignation, nor was he dismissed from his position.
CONFLICT OF INTEREST RULES FOR TOP MANAGEMENT POSITION IN A REGULATOR	NO	Not specific provisions for top management position in regulator. The same provisions are applied as for members of the regulatory bodies. The Prevention of Conflict of Interest Act (2013) also should be applied.	No change.	
CONFLICT OF INTEREST RULES FOR MEMBERS OF DECISION MAKING BODY ON MEDIA SUBSIDIES	YES	The conflict of interest rules for the Electronic Media Council are applied here as well. If specific expert committees are established to deal with media subsidies they are regulated by subsidiary legislation. The Prevention of Conflict of Interest Act (2013) also should be applied.	Reinforcement. The amendments of the Electronic Media Act in 2013 have enabled nonprofit electronic media to compete for the funds allocated from the Fund for the Promotion of Pluralism and Diversity of Electronic Media, including online publications (web portals) for the first time.	

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
MERIT SYSTEM FOR NOMINATION AND APPOINTMENT OF MEMBERS OF A REGULATORY BODY	YES	<p>The Electronic Media Act (Article 68) – Members of the Electronic Media Council are appointed by the Parliament. It is specified that the members have to be professionals with knowledge and experience in the radio, television, publishing, cultural or similar field. The members shall be public persons who have distinguished themselves in public life by advocating respect for democratic principles and the rule of law, building and promotion of the highest values of the constitutional system of the Republic of Croatia, development of civil society, defense of human rights and freedoms, as well as protection of the freedom of expression.</p> <p>The Electronic Communication Act (Article 8) – In the case of the regulatory body of the Croatian Postal and Electronic Communication Agency a member of the Agency's Council shall hold a Master degree in electronic communications, postal transportation, law or economy; have active knowledge of at least one foreign language (English, French or German).</p> <p>The members of the Agency's Council shall have 5 years of working experience in the area of electronic communications or postal services.</p> <p>The Electronic Communication Act (Article 10)</p> <p>– Director of the Croatian Postal and Electronic Communication Agency shall hold Master degree in electronic communications, postal services, law or economy; have at least three years of working experience in managerial positions in the area of electronic communications or postal services, and knowledge of at least one foreign language (English, French, German).</p>	No change.	The nominations and appointments are often influenced by political affiliations or based on loyalty to patrons.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
MERIT SYSTEM FOR NOMINATION OF MEMBERS OF PSB GOVERNING BODIES	YES	<p>The Croatian Radiotelevision Act (Article 20) – Director shall hold Master degree, have knowledge of at least one foreign language (English is obligatory), minimum 10 years on managerial positions in the media or other business systems, have knowledge in the field of media policy and legislation, as well as in new information technologies.</p> <p>The Croatian Radiotelevision Act (Article 22) – Supervisory Board members shall hold Master degree, have knowledge of at least one foreign language and have 10 years of working experience. One member of the Board has to be a professional in the area of law, and one in finances/economy. Most of the members should have working experience in the field of media.</p> <p>The Croatian Radiotelevision Act (Article 25) – Members of the Council of HRT shall be media experts, well known intellectuals, artists, professionals, public persons who have distinguished themselves in public life by commitment to democratic principles, rule of law, the values promoted in the Constitution, development of civil society, protection of human rights and freedoms, enhancement of culture, science and art and protection of freedom of speech and media. In the appointment process, pluralism of worldviews and other types of pluralism shall be ensured.</p>	No change.	The nominations and appointments are often influenced by political affiliations or based on loyalty to patrons.
BAN OF POLITICAL PROPAGANDA OUTSIDE ELECTION PERIOD	YES	<p>The Electronic Media Act – Political advertising (Article 30) and sponsorship (Article 35) are banned outside an election period.</p>	No change.	There are common practices of indirect 'promotion' of political parties/personalities in the media all the time.
OBLIGATION OF FAIR AND BALANCED REPORTING	YES	<p>Electronic Media Act (Article 35). Media Act (Article 3). Croatian Radiotelevision Act (Article 7). Croatian News Agency Act (Article 5).</p>	No change.	Not implemented. No one monitors this, only the Croatian Journalists Association provides occasional reflections. Numerous research reports show the breach of this provision and the overall lowering of the quality and ethical standards of the media.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
EDITORIAL INDEPENDENCE RULES FOR PRIVATE MEDIA	PARTIALLY	The Media Act (Article 26) – The relations between media owner, editor in chief and journalists should be regulated by the Statute of the media (self-regulation). The Statute needs to be approved by the majority of the total number of journalists in the media. The Electronic Media Act (Article 23) stipulates that in order to change the media program orientation, owner has to get the opinion of the editorial board.	Reinforcement. In July 2013, the Value Added Tax Act was introduced. Its Article 38 stipulates tax reduction for daily newspapers (with general news) containing minimum 25,000 words (the tax is reduced to 5%), and for other newspapers and magazines (the tax is reduced to 10%). However, this should only apply to the print media which have a statute.	Many media do not have a statute. This area is not monitored by regulators. With the new regulation on tax reduction the print media are encouraged to adopt such internal regulation.
EDITORIAL INDEPENDENCE RULES FOR PSB	YES	Croatian Radiotelevision Act (Article 17) guarantees autonomy through editorial independence.	No change.	There are indications of close connections between centers of political power and managerial/editorial positions at the PSB in Croatia. The 2010 Croatian Radiotelevision Act has been criticized for strengthening political control, especially through the appointment procedure for the director.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
JOURNALISTS' AUTONOMY - CONSCIENCE CLAUSE	YES	The Media Act (Article 26) stipulates that the relations between media owner, editor in chief and journalists should be regulated by the Statute of the media (self-regulation). It should regulate the appointments and dismissal of editors in chief, and the procedure and conditions in which editors and journalists have to exercise their rights in case of change of ownership or management that results in considerable changes in the program orientation of the media (conscience clause). The Media Act (Article 27) stipulates that journalists have the right to express their opinion with no consequences for their working contracts and conditions. The Media Act (Article 28) stipulates that journalists have the right to refuse an assignment which is not in accordance with good journalistic practice without consequences for their working contracts and conditions.	No change.	Many media outlets do not have a statute and when they do, the provisions are often not implemented. This area is not monitored by regulators. Large number of journalists works under unlawful contracts (so called RPO contracts). With such employments the employers in the media industry avoid taxes while putting journalists in insecure, precarious in the labour market).
JOURNALISTS' OPINION ON APPOINTMENTS AND DISMISSALS OF EDITORS IS REQUESTED	YES	The Croatian Radiotelevision Act (Article 20) – Before the appointment of editors in chief the opinion of journalists and other employees participating in the creative process is required. The Croatian Radiotelevision Act (Article 21) – Before the appointment of editors in chief, the director of the rpsb asks for the opinion of journalists and other employees included in the creative process.	No change.	
LEGAL OBLIGATION FOR EMPLOYERS TO SIGN COLLECTIVE CONTRACTS ON LABOUR RIGHTS IN THE MEDIA	NO			The Trade Union of Croatian Journalists has made some efforts over the years, and attempts to sign a collective contract on national level. However there are no legal obligations on labour rights in the media.

## MACEDONIA

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
<p>TRANSPARENCY RULES FOR ALL MEDIA (MEDIA REGISTER, PUBLISHED REPORTS ETC.)</p>	<p>PARTIALLY</p>	<p>Transparency is regulated as an obligation for the broadcast and print media. Article 15 of the new Media Law adopted in December 2003 stipulates that: broadcasters are obliged, at least three times per year, to publish on their program service (within the prime time) the following data: data on their ownership structure; names of the editor in chief and editors of other program departments; data on their sources of finances in the previous year; data on their total income and expenditure in the previous year; data on their average viewing and listening figures in the previous year. In addition, broadcasters are obliged to submit the same data to the Agency for Audio and Audiovisual Media Services, by 31 March at the latest. If the broadcaster does not fulfil these obligations, the Agency will issue written warning and will oblige the broadcaster to provide the data within 45 days. In case the broadcaster does not provide the data within the additional deadline, the Agency can withdraw its broadcasting licence. The print media are obliged to publish the same data at least in one daily newspaper, once per year, by 31 March at the latest and to provide the Agency with the prove (extract from the printed data in the daily newspaper) within 15 days since their publication. In the Article 30 of the Media Law, fines are envisaged for all media outlets (from 4.000 to 5.000 euro) if they don't submit the data to the Agency within the specified deadline and in the required format (for broadcasters) or if they don't publish the data as specified in the Law (both for broadcasters and for the print media). The print media can be also fined (1.500 to 3.000 euro) if they don't submit a copy of all their printed editions to the National University Library (Article 30).</p>	<p>Transparency rules were introduced for the first time with the 2005 Broadcasting Law. In the new Media Law are incorporated almost the same obligations for the broadcasters. The new Media Law extended these rules also to the print media.</p>	<p>Until December 2013, these obligations were monitored by the Broadcasting Council. Most of the broadcasters complied with the legal provisions related to transparency. According to the new Media Law, the obligations of the broadcasters and of the print media related to media transparency will be monitored by the new Agency for Audio and Audiovisual Media Services.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
SPECIFIC TRANSPARENCY RULES FOR PSB	YES	<p>MRTV is obliged to submit its annual Working program and Financial Plan for the next year to the Parliament by 30 October the latest. (Article 106 Law on Audio and Audiovisual Media Services). In addition, MRTV is obliged to submit its annual operational and financial report (for the previous year) to the Parliament, by 31 March the latest. The annual report and the Working plan have to be published on MRTV website.</p> <p>According to Article 122 of the Law on Audio and Audiovisual Media Services the sessions of the Council of MRT (supervisory body) are public and the MRTV is obliged to publish on its Web site the Rules of Procedure of the Council, the agendas and minutes from its sessions, approved decisions, etc.</p>	<p>The transparency rules for the public broadcaster were more clearly stipulated in the 2005 Broadcasting Law. These transparency obligations are reinforced with the Law on Audio and Audiovisual Media Services, but the transparency rules are not clearly defined for all managing bodies.</p>	<p>Not all obligations have been implemented so far. Most of the documents could not be found on MRT website, especially the reports and decisions of the MRT Council are not published regularly. Neither the regulator nor any other body monitors the implementation of these specific transparency rules for the psb.</p>
TRANSPARENCY RULES FOR MEDIA REGULATOR(S)	YES	<p>Article 8 of the new Law on Audio and Audiovisual Media Services relates to the accountability of the regulator: the Agency submits annual working report, Financial Report, Working plan and Financial Plan to the Parliament.</p> <p>Article 9 stipulates the transparency rules for the Agency. It is obliged: to publish research and analyses related to the market development and current situation on the media market; to conduct public consultations at least once every three months in order to enable all the stakeholders to express their concerns and opinions regarding the current situation on the market and the work of the Agency; to published the results from the public consultations on its website.</p> <p>Article 10 provides the manner of securing the influence of the public over the work of the Agency. Before the adoption of the by-laws and its annual Working program the Agency is obliged to publish the draft documents on its website and to open a public consultation process that lasts at least 30 days. The summarised opinions from the public and reasoned positions of the Agency should be published on its website.</p> <p>There are also other provisions in the Law that stipulate obligations for the Agency to publish its Rules of Procedures, by-laws, public competitions, the decisions and minutes of its meetings and other documents on its website.</p>	<p>These rules were reinforced with the 2005 Broadcasting Law, but with new Law on Audio and Audiovisual Media Services they are further elaborated, so there are now three separate groups of provisions for the Agency on Audio and Audiovisual Media Services: accountability, transparency and influence of the public over the Agency's work.</p>	<p>Most of the regulator's obligations according the Broadcasting Law were formally implemented. The listed documents were published on its website, but the minutes and decisions made during the sessions were not always duly reasoned and detailed. This practice has been evidenced since the beginning of 2008. It is yet to be seen how the provision of the new Law on Audio and Audiovisual Services will be implemented.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
ANTI-CONCENTRATION RULES	YES	<p>The Article 37 of the Law on Audio and Audiovisual Media Services allows <i>horizontal integration</i> of capital (entities on a single market), but foresees certain restrictions with regards to the share in the founding capital, as well as with regards to the number of broadcasters that a natural person or a legal entity may own. For instance, a natural person or a legal entity may hold additional four licences - one on national level (not exceeding 50% of the capital), one on regional and two on local level, provided that the two areas do not share a common border. Further, a person or entity that holds a licence to pursue broadcasting activity on regional level may hold additional three licences - one on regional and two on local level, provided that the two regions do not share a common border. A third form of allowed horizontal integration is when a legal entity or a natural person holding a licence to pursue broadcasting activity on local level appears at the same time as an owner in at most two other broadcasters with licences to pursue broadcasting activity on local level, provided that the two areas do not share a common border.</p>	<p>The Broadcasting Law 2005 introduced more liberal provisions on media concentration compared to the previous law. The main explanation was that the previous restrictive regulations prevented circulation of capital and transfer of ownership. During the course of the law's adoption, the media industry committed itself firmly to liberalisation. Most of these rules remained the same in the new Law on Audio and Audiovisual Media Services.</p>	<p>Over the past years, the Broadcasting Council regularly monitored the illegal media concentration and reacted in all cases when it noted it. Several stations were under scrutiny because their owners or managers owned companies for advertising and propaganda or film production. In the past, the public attention was mostly diverted towards the consequences that some larger cases of illegal media concentration had over the public opinion, market and competition (the case of A1 and its related daily newspapers Vreme, Spic and Koha).</p>
CROSS-OWNERSHIP RULES	YES	<p>Regarding the ownership connections (<i>diagonal integration</i>) of broadcasters with media which belong to other markets, the restriction (Article 39 of the Law on Audio and Audiovisual Media Services) only refers to daily newspapers and news agencies. Neither the broadcaster, nor its founder may participate in the ownership of a press company that publishes a daily newspaper or runs a news agency. <i>Vertical integration</i> or integration of the capital of a broadcaster and companies of other related activities is regulated by the same Article: advertising and propaganda, film production, distribution of audiovisual works and telecommunication services. Neither the broadcaster, nor its founder may own a share in the founding capital of companies registered for these activities. The Law also determines that broadcasting activity is incompatible with pursuing market and public opinion research.</p>	<p>Most of these rules existed in the 1997 Law, but they were reinforced and stipulated in quite more detailed manner in the 2005 Broadcasting Law. Most of these rules remained the same in the new Law on Audio and Audiovisual Media Services.</p>	<p>The only case of illegal concentration in the past was the one between A1 television and daily newspapers Vreme, Spic and Koha. Since their closure in 2011, there have been no other cases of diagonal concentration.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
BAN/RESTRICTIONS OF MEDIA OWNERSHIP FOR POLITICIANS	YES	Article 38 of the Law on Audio and Audiovisual Media Services stipulates that political parties, state bodies, bodies of the state administration, public enterprises, local self-government units, public office holders and members of their families, may not pursue broadcasting activity or appear as founders or co-founders of broadcasters, or acquire ownership of broadcasters.	The provision was the same as the one in the 2005 Broadcasting Law.	Formally, this provision is implemented but in practice there are hidden relations between owners and politicians, while in some cases the names of the real owners do not formally appear in the registry.
BARRIERS/THRESHOLDS FOR FOREIGN OWNERSHIP IN THE MEDIA	NO	Article 35 of the Law on Audio and Audiovisual Media Services stipulates that a foreign natural or legal person can found or participate in the ownership of a domestic broadcaster under the same terms as domestic natural persons and legal entities.	The same provision like in the 2005 Broadcasting Law	Mainly implemented.
SEPARATE ANTI-MONOPOLY BODY FOR MEDIA INDUSTRY	NO			
GENERAL ANTI-MONOPOLY BODY IN CHARGE OF MEDIA CONCENTRATION	YES	It is the Commission for Protection of Competition.		Broadcasting Council and Commission for Protection of Competition have established cooperation and in 2008 and 2009 they had mutual activities related to cases of illegal media concentration.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR MEMBERSHIP IN REGULATORY BODIES	YES	<p>Article 16 of the Law on Audio and Audiovisual Media Services provides that the following persons may not be elected as members of the Council of the Agency: members of the Assembly and Government, persons appointed by the Assembly or the Government, senior officials in the local self-government units, director or member of managing or supervisory board of a public enterprise; persons performing duties in the bodies of a political party or a religious community; persons who are owners or shareholders, who are members of the managing boards, or who directly or indirectly have interests in a legal entity involved in audio or audiovisual activity, or in a company involved in related activity (advertising, electronic communications, production and sale of audio or audiovisual technical goods, etc.); persons whose family members (parents, sibling, spouse, offspring) own shares or sit in the managing bodies of broadcasters; persons lawfully sentenced to a term in prison longer than six months, etc.</p>	<p>Almost the same rules applied for the members of the regulator in the 2005 Broadcasting Law.</p>	<p>Formally implemented, but there are strong affiliations with political parties.</p>
CONFLICT OF INTEREST RULES FOR GOVERNING BODIES OF PSB	YES	<p>Article 119 of the Law on Audio and Audiovisual Media Services provides that members of the Programming Council of MRTV shall not be: members of the Assembly, members of the Government, appointed and elected officials, senior officials in the state administration, the local self-government units or regulatory bodies, directors or members of Executive Boards of public enterprises; persons that in the last five years were public officials or performing duties in political party bodies or religious community; persons employed in MRTV or in external entities which have concluded working contracts with MRTV, persons who as owners of share or stocks, as members of management bodies or as employees or engaged to work on any basis, have interest in other broadcasting organisations or news agencies, advertising companies etc. The same rules apply for the MRTV Supervisory Board (Article 127).</p>	<p>Reinforced with the 2005 Broadcasting Law. They remained almost the same in the new Law on Audio and Audiovisual Media Services.</p>	<p>Mostly implemented, but there were cases of electing members who have affiliations with political parties.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR MANAGEMENT OF PSB	PARTIALLY	Article 130 of the Law on Audio and Audiovisual Media Services: The Director and Deputy Director of MRTV shall not be members of the Programming Council and of the Supervisory Board of MRTV.	According to the 2005 Broadcasting Law there was also Managing Board. The new Law on Audio and Audiovisual Media Services envisaged only Director and Deputy Director as management of PSB:	Not fully implemented in the past. There were members of the psb Managing Board who were senior officials in public institutions.
CONFLICT OF INTEREST RULES FOR TOP MANAGEMENT POSITION IN A REGULATOR	YES	Article 19 of the Law on Audio and Audiovisual Media Services. The Director, his spouse, as well as close relatives may not own shares, directly or indirectly in entities that are regulated by the Agency. There are no such bodies.		
CONFLICT OF INTEREST RULES FOR MEMBERS OF DECISION MAKING BODY ON MEDIA SUBSIDIES	N/A			
MERIT SYSTEM FOR NOMINATION AND APPOINTMENT OF MEMBERS OF A REGULATORY BODY	YES	Article 16 of the Law on Audio and Audiovisual Media Services: Members of the Council of the Agency may be persons who are citizens of the Republic of Macedonia, who have higher education, at least five years experience in their field of activity and with public prominence in the fields of communication sciences, journalism, telecommunications, information sciences, culture, economy, law and other fields relevant to the competences of the Broadcasting Council.	Similar provision like in the 2005 Broadcasting Law.	There have been many examples in the past of appointed members who did not have any expertise in the respective fields (without completed higher education) or had expertise in totally irrelevant fields for the work of the Broadcasting Council (machine engineering, chemistry, etc.)
MERIT SYSTEM FOR NOMINATION OF MEMBERS OF PSB GOVERNING BODIES	YES	Article 117 of the Law on Audio and Audiovisual Media Services: Candidates for the Members of the Programming Council of the MRTV shall be citizens of the Republic of Macedonia, who have higher education, and who are prominent persons known in the public by their commitment to the democratic values and principles, rule of law, development of highest values of the constitutional order of the Republic of Macedonia, development of the civil society, protection of human rights and freedoms, as well as freedom of expression.		

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
BAN OF POLITICAL PROPAGANDA OUTSIDE ELECTION PERIOD	NO	Not explicitly stated in the Law.		Political propaganda is constantly being run outside election period.
OBLIGATION OF FAIR AND BALANCED REPORTING	YES	Article 68 of the Broadcasting Law: Radio and television programmes shall be based on the following principles: Openness to diverse political views and positions; objective and unbiased presentation of events, with equal treatment of diverse views and opinions, enabling the free creation of a public opinion on individual events and issues.		There are plenty violations, especially during the election campaigns.
EDITORIAL INDEPENDENCE RULES FOR PRIVATE MEDIA	YES	Article 61 of the Law on Audio and Audiovisual Media Services: Broadcasters, while performing their activity, shall comply with the following principles: Autonomy, independence and accountability of editors, journalists and other authors involved in the creation of programmes and editorial policy.		The editorial policy of the biggest broadcasters (tv stations) has not been independent (from ruling parties, owners, and business) for many years now.
EDITORIAL INDEPENDENCE RULES FOR PSB	YES	Article 111 of the Law on Audio and Audiovisual Media Services: The journalists and editors of MRTV and other persons directly involved in the production of MRTV programs are obliged to respect the principle of political independence and autonomy of the journalists.		The editorial policy of the public broadcasters has been influenced by the ruling parties for many years now.
JOURNALISTS' AUTONOMY - CONSCIENCE CLAUSE	NO	There is only the Code of ethics of the Association of Journalists.		
JOURNALISTS' OPINION ON APPOINTMENTS AND DISMISSALS OF EDITORS IS REQUESTED	YES	Article 8 of the Media Law from December 2013. Before the appointment or dismissal of the editor, the publisher is obliged to as for an opinion of the journalists.		
LEGAL OBLIGATION FOR EMPLOYERS TO SIGN COLLECTIVE CONTRACTS ON LABOUR RIGHTS IN THE MEDIA	NO	The provisions of the Labour Law equally apply to journalists, but there is no specific provision in the Media Law that obliges media employers to sign collective contracts.		

## SERBIA

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
<p><b>TRANSPARENCY RULES FOR ALL MEDIA (MEDIA REGISTER, PUBLISHED REPORTS ETC.)</b></p>	<p>PARTIALLY</p>	<p>Transparency rules are minimal. All media outlets are required to register in the Media Register, kept by the Business Registers Agency, and report only the size of the founding capital. Broadcasting media have to report their ownership structure to the regulator, but only through ownership stakes and names of individual natural persons and legal entities. Real owners behind legal persons are not registered. No specific financial reports are required from the media. They submit annual financial reports to the Business Registers Agency in the same way as other enterprises, without data on types and sources of revenues, circulation or size of the audience.</p>	<p>Reinforcement. New media laws are in preparation. The Draft Public Information and Media Bill introduces a new Media Register for newspapers and agency services, while broadcasters will be registered by the Republic Broadcasting Agency. The Media Register will include data on owners with stakes above 10%, on related persons (spouses, close relatives, etc.), the amount of state aid received and types of revenues earned from state bodies (advertising, reporting, etc.).</p>	<p>Crucial information on media – their ownership, business performance, types and sources of revenues, wages of journalists – are not publicly available. All these types of information are considered a business secret. Individual owners behind registered legal persons are unknown, especially if legal persons come from off-shore zones. Data in the Media Register and Register of Broadcast Licences is available on specific websites, but it is scarce, incomplete and inaccurate. Data is related to individual media outlets and cannot be processed by a website user. Annual financial reports of media outlets are available on the website of the Business Registers Agency. However, they do not reflect the specific media economy.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
SPECIFIC TRANSPARENCY RULES FOR PSB	NO	<p>PSB institutions are not treated in any special way. Their only obligation is to submit financial reports to the Business Registers Agency, like all other media and like all other business companies. Since PSB institutions are in state ownership, they are subject to yearly financial control by the State Audit Institution (Article 91, Broadcasting Law), like all other companies owned by the state.</p>	<p>Reinforcement. The Media Strategy (2011) treats PSB institutions as different from other media. It introduces the obligation for PSB to make publicly available their programming as well as financial plans and reports on their implementation. These documents are to be publicly debated. The Strategy also stipulates a public financial control of PSB. Public broadcasters will be required to keep separate records on different types of revenues (commercial and subscription fee).</p>	<p>Very few data are available on republic public broadcaster RTRS and provincial public broadcaster RTV. Their annual financial reports show only a number of employees and total sums of revenues and expenditures. There is no transparency in regard to the structure of revenues and expenditures, loans and debts, financial contracts, subscription fee payments, investment in programming production, salaries of journalists, or decision making concerning programming and business operations. The only source of information data on RTRS is its Director General. In 2008-2010, RTRS refused to obey 8 orders of the Public Information Commissioner to provide data on its business operations. RTRS' Director General preferred to pay penalties for not respecting the Access to Information Law than to disclose financial documents. The Republic Broadcasting Agency has monitored the (genre) structure of PSB programming (2010, 2011 and 2012) but has not controlled if PSB institutions meet their other programming obligations.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
TRANSPARENCY RULES FOR MEDIA REGULATOR(S) YES	YES	<p>The Broadcasting Law obliges the Republic Broadcasting Agency, i.e. its Council, to make its work public (Article 32). However, the Agency is allowed to decide on the way in which to conduct this by its own Statute. Its only imposed obligation is to publish the annual report on its work, like all other state bodies. According to the RBA's Statute, the Agency makes its decisions and work public by making available online the Council's meetings minutes (except those designated as official secret), by allowing journalists to follow open meetings (there could be closed ones too), by holding press conferences or issuing press releases, etc. Financing of the RBA is based on the plan it makes by itself, which is approved by the Government. Its annual financial reports consist of balance sheets only.</p>	<p>Expected to be reinforced. A new law on broadcasting is under preparation. Transparency of the regulator should be reinforced.</p>	<p>Insufficient transparency in the work of the Republic Broadcasting Agency is the main cause of strong and wide doubts about its independence, which have been present in the media community and the public at large since its establishment. Although in recent years the availability of data on the work of the RBA has been increased – all of the Council's acts and decisions are available on its website – the way the Council makes its decisions is not sufficiently transparent. Most often, the Council communicates with the public through official releases and statements of its top officials.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
ANTI-CONCENTRATION RULES	PARTIALLY	<p>Specific anti-concentration rules pertain to broadcast media only. They are rather general and unelaborated. Three criteria are used – ownership stakes in capital, simultaneous performance of broadcasting activities and presence of same natural persons and connected persons as founders of different broadcasters. Precise thresholds for non-allowed concentration are defined for a national broadcaster (above 5% ownership stake in the capital of another national broadcaster) and for a regional/local broadcaster (above 30% stake in the capital of another broadcaster on the same market) (Article 99, Broadcasting Law). A broadcaster may not have several broadcasting licences. It could simultaneously have only one radio and one TV licence, but only in the case it is not a sole broadcaster in the same market. Shares in the management or voting rights or in the advertising market are not taken into account. Respect of anti-concentration rules is the responsibility of the Republic Broadcasting Agency in issuing broadcasting licences and approving changes in ownership structure.</p>	<p>Reinforcement. New media laws are in preparation. The Draft Public Information and Media Bill introduces the rules for print media that did not exist before. It prevents concentration of publishers of daily newspapers whose circulation exceeds 50% of the total annual circulation of daily papers in Serbia. The criterion for broadcast media is a share of audience, which was not used before. Broadcasters are not allowed to merge if their share in the audience exceeds 35% of radio or TV audience in the market (Article 50).</p>	<p>The first Public Information Law (2003) did not include the concept of illegal concentration because the problem seemed far away in the then highly diversified media sector. In the meantime, the market became quite concentrated. However, due to the lack of transparency of media ownership, too general rules on illegal concentration and lack of methodology for control, no measures were taken to prevent it. There is no effective check of media concentration. It is the responsibility of broadcasters to prove they obey the anti-concentration rules and to report changes in the ownership structure. The Republic Broadcasting Agency is believed to have approved several doubtful changes in the ownership structure of national broadcasters (TV Avala, RTV B92, TV Fox) but it claims that the documents submitted did not show breach of the valid rules at the time. Large media owners have actively obstructed a 2009 attempt to bring new anti-monopoly regulation.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
<b>CROSS-OWNERSHIP RULES</b>	PARTIALLY	<p>Cross-ownership is not allowed on two lines only: broadcasters-daily newspaper publishers and broadcasters-news agencies (Article 97, Broadcasting Law). Specifically, cross-ownership exceeding 5% of the ownership stake in the total capital is forbidden for a national broadcaster in relation to a publisher of a daily paper with circulation over 30,000, and in relation to a news agency. Illegal is also cross-ownership between a regional/local broadcaster and a publisher of a daily local paper in the same or the neighbouring market (Article 99).</p>	<p>Partly reinforcement, partly relaxation. New media laws are in preparation. The Draft Public Information and Media Law regulates new forms of illegal concentration between newspaper publishers and distribution organisations and between newspaper publishers and media buying (advertising) agencies. Concentration is now related to both founding and governing (voting) rights. However, the allowed threshold for the ownership stake of a national daily paper publisher in a national broadcaster (and vice versa) is increased from 5% to 25% (Article 51).</p>	<p>There is no check of cross-ownership. It is the responsibility of media themselves to report changes in ownership structure. New forms of cross-ownership appear in the telecommunication market (mobile providers-cable channels), which are not regulated by any law.</p>
<b>BAN/RESTRICTIONS OF MEDIA OWNERSHIP FOR POLITICIANS</b>	PARTIALLY	<p>Media ownership is banned for specific types of political organisations. The Broadcasting Law prevents political parties, organisations and coalitions and legal persons established by them to be holders of a broadcasting licence (Article 42). The Public Information Law prevents legal persons mostly financed by public funds from being (direct or indirect) media founders (Article 14). As far as individuals are concerned, their rights are regulated by the laws on conflict of interest prevention. These rules do not allow public servants to establish a commercial company in any sector. Public officials, while in office, must transfer their governing rights to another legal or natural person.</p> <p>No legal document prevents party officials as individuals to be media owners.</p>	<p>New media laws are in preparation. It is unknown if there will be changes in this area.</p>	<p>A number of media are actually owned by politically influential individuals, usually former or current officials of political parties. Their ownership is often hidden behind members of their families, off-shore companies, publicly unknown individuals or journalists as registered owners.</p>

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
BARRIERS/THRESHOLDS FOR FOREIGN OWNERSHIP IN THE MEDIA	PARTIALLY	Media legislation does not restrict foreign participation in print and online media. The Public Information Law insists on the same rights of foreign and domestic legal and natural persons in regard to media. Broadcast media, however, are subjected to some restrictions. The licence holder must be a Serbian entity, situated in Serbia. The threshold for foreign ownership in the founding capital of the licence holder is 49%. Foreign organisations registered in countries where it is not possible to determine the origin of the founding capital are not suitable for being co-owners in a Serbian entity (Article 41, Broadcasting Law). Foreign ownership is not allowed in PSB.	Relaxation. Draft Information and Media Bill reinforces the principle of equal rights of domestic and foreign legal and natural persons in the field of public information.	There is no much foreign capital in the media market. Foreign capital holds two out of four commercial national TV broadcasters (TV Prva and TV B92), two most circulated national dailies (Blic and Alo) and some online portals. No foreign capital is present in regional or local media. The limit of 49% of foreign capital in broadcasting licence holders did not prevent a complete foreign ownership of some broadcast media. In these cases domestic legal or natural persons only formally act as majority owners. At the same time, nominal foreign owners are often only a mask concealing real domestic owners behind them.
SEPARATE ANTI-MONOPOLY BODY FOR MEDIA INDUSTRY	PARTIALLY	Since specific anti-monopoly measures are prescribed for broadcast media only, they fall in competencies of the Republic Broadcasting Agency.	New trend. A new solution, envisaged in the Draft Public Information and Media Bill, goes away from establishing a separate body for the entire media industry and puts anti-concentration measures in the competence of the general anti-monopoly body.	The Republic Broadcasting Agency has not proven effective in preventing media concentration. It operates with data supplied by broadcasters, without independent check and without a mandate to identify the true owners behind registered legal entities. It is generally assumed that national broadcasters B92 and TV Prva have the same owner, but their respective changes in ownership structure were allowed by the RBA. The RBA also allowed the change of ownership structure of TV Avala, although there were indices that a new owner Željko Mitrović (a sole owner of national TV Pink) gained a bigger ownership stake than the allowed 5%. TV Košava got a national licence in 2006, although it was generally known that it took a large loan for the founding capital from the owner of TV Pink.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
GENERAL ANTI-MONOPOLY BODY IN CHARGE OF MEDIA CONCENTRATION	PARTIALLY	The Commission for Protection of Competition does not deal with broadcasting media, since they fall in the competence of the Republic Broadcasting Agency. Definitions of concentration in the Broadcasting Law differ from the ones in laws respected by the Commission for Protection of Competition. However, the Commission is in charge of concentration in the print media market and print distribution market according to general anti-concentration rules for all market players.	New trend. The Draft Public Information and Media Bill makes the national anti-monopoly body responsible for checking and deciding on concentration in the media industry. It will have the obligation to make a sector analysis of media market and related markets at least once in three years (Article 52).	The Commission for Protection of Competition reacted in 2011 to prevent concentration on the print distribution market. In 2010, German company WAZ accused the Commission for improper behaviour regarding WAZ's request to allow it a purchase of Novosti Company and left the Serbian market.
CONFLICT OF INTEREST RULES FOR MEMBERSHIP IN REGULATORY BODIES	YES	There are several discriminatory rules for membership in regulatory bodies. They are rather general and do not include a time limit for the unacceptable status of the member candidate. At the moment of candidacy for the post, they cannot be members of parliaments, officials of executive state bodies and political parties, or spouses or close relatives of persons holding those positions. Restrictions also pertain to owners, shareholders, members of governing and controlling bodies and employees of organisations engaged in production or distribution of radio and TV programming or related activities (advertising, telecommunication and similar) and to spouses and close relatives of such persons (Article 25, Broadcasting Law).	Expected to be reinforced. A new law on broadcasting is in preparation. Conflict of interests rules are expected to be reinforced.	Conflicts of interests are not checked. Candidates for regulatory body members claim themselves that they meet all the conditions required. A lack of time limits for unacceptable status for membership in regulatory bodies creates confusion. The RBA's decision to commission a paid job from an organisation where a member of the RBA Council used to be an employee was perceived by the Anti-Corruption Council as a case of conflict of interest (ACC's report on media, 2011), although it is not strictly defined as such in the rules.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR GOVERNING BODIES OF PSB	YES	Members of the governing bodies of PSB cannot be members of parliament, members of government or other executive bodies, officials of political parties or members of the Broadcasting Council (Article 87, Broadcasting Law). Except for these general discriminatory rules, there are no other, specific rules on conflicts of interest or a time limit for unacceptable status.	Expected to be reinforced. A new law on PSB is in preparation. Conflict of interests rules are expected to be reinforced.	The Anti-Corruption Council (ACC) considered that business relations of some members of the governing body of RTS with RTS made clear cases of conflict of interest, although such rules are not prescribed by existing regulation (ACC's report on media, 2011). In the view of the ACC, it was unacceptable that members of the RTS Governing Board were authors or producers of programs broadcasted by RTS, or were closely related to private production companies which cooperated with RTS.
CONFLICT OF INTEREST RULES FOR MANAGEMENT OF PSB	PARTIALLY	The rules apply only to the Director General of PSB (Article 90, Broadcasting Law), but also to directors and editors in chief of regional and local broadcasters with the status of public enterprises (Article 96). The rules are the same as for governing bodies of PSB. Members of management bodies cannot be members of national, provincial or local parliaments, members of executive bodies of power at any level, and officials of political organisations.	Expected to be reinforced. A new law on PSB is in preparation. Conflict of interests rules are expected to be reinforced.	No institution monitors conflict of interest of management bodies of PSB. Due to non-transparency of management decisions, conflicts of interests are difficult to identify.
CONFLICT OF INTEREST RULES FOR TOP MANAGEMENT POSITION IN A REGULATOR	NO			

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
CONFLICT OF INTEREST RULES FOR MEMBERS OF DECISION MAKING BODY ON MEDIA SUBSIDIES	N/A	There are no specific bodies making decisions on media subsidies. There are no specific rules on members of any bodies making decisions on aid to media.	Expected to be introduced. The Draft Public Information and Media Bill envisages the establishment of special decision-making bodies on media project funding through public competitions. Their members should be independent media experts "who have no conflict of interests and do not hold a public office". However, the nature of the conflict of interest and rules for preventing them are not specified.	Decisions on media subsidies are taken by executive bodies of power (usually the highest office holders). They are granted to state-owned media, without set criteria except for past practices and available budgets. The practice of the Ministry of Culture and Information in making decisions on project funding is changing towards greater transparency but still lacks established criteria.
MERIT SYSTEM FOR NOMINATION AND APPOINTMENT OF MEMBERS OF A REGULATORY BODY	YES	Only one, scarce and imprecise, legal provision defines qualifications for members of the regulator. They should be "respectable experts in fields of significance for performing the work in competence of the Republic Broadcasting Agency (media experts, advertising experts, lawyers, economists, telecommunication engineers and others) (Article 22, Broadcasting Law).	Expected to be reinforced. A new law on broadcasting is in preparation. The merit system is expected to be more specific.	The rules are ambivalent and provide ground for different interpretations. In some cases it is obvious that they are not respected. The chairman of the Council is a priest with no expertise in media. In 2011, out of two candidates for the Broadcasting Council – a lawyer Goran Petrović, who had a working experience in a health and pharmacy institution and used to be a journalist in his young age, and telecommunication expert Nataša Gospić, with a PhD degree and a large number of scientific works on information society, the Parliament elected the former.
MERIT SYSTEM FOR NOMINATION OF MEMBERS OF PSB GOVERNING BODIES	PARTIALLY	Criteria for nomination of members of governing bodies of PSB are very general and superficial. Members are elected among "journalists and affirmed experts for media, management, law, finances and among other respectable persons" (Article 87, Broadcasting Law).	Expected to be reinforced. A new law on PSB is in preparation. The merit system is expected to be more specific.	Among 9 members of the present Board of Governors of RTR (since 2011) there is one media expert and two journalists, and no experts in management, law or finances. Two members are historians, while others include a sociologist, political scientist, psychologist and economist. Majority are university professors.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
BAN OF POLITICAL PROPAGANDA OUTSIDE ELECTION PERIOD	YES	Several legal acts forbid advertising by political organisations outside election periods (Advertising Law, Election Law and Broadcasting Law).	No change is expected in new media laws in preparation.	The ban is generally respected. The control is done by the Republic Broadcasting Agency, which punished some media for broadcasting political messages outside the campaigning time for (local) elections.
OBLIGATION OF FAIR AND BALANCED REPORTING	YES	The normative ideal of journalistic reporting is truthful, complete, credible and current reporting, free of censorship and pressures. Media laws, however, do not use the phrase "fair and balanced" reporting. The ideal is only indirectly defined, through the institution of due journalistic attention. The Public Information Act stipulates the obligation of a journalist and responsible editor to check the "origin, truthfulness and completeness of information" before its publishing, with attention adequate to circumstance, and to publish the information "credibly and completely" (Article 3).	No change. The Draft Public Information and Media Bill uses the same definition and terms. Additional obligation is envisaged for PSB, whose reporting should be "current and impartial" (Article 8).	Media strive for free reporting, liberated from censorship and direct and indirect pressures; in the public interest. The ideal of balance is not a part of journalistic professional ideology. The stories often follow the model "one event, one topic, one source". Media studies show that fair and balanced reporting is rare.
EDITORIAL INDEPENDENCE RULES FOR PRIVATE MEDIA	PARTIALLY	Media legislation treats editorial independence as part of the concept of free information dissemination. The Public Information Law prohibits any restriction to the freedom of information, particularly by the abuse of state or private authority as well as any form of pressure on a media outlet or its personnel (Article 2), regardless of the ownership structure of media. Although editorial independence is implied as desirable, it is not precisely defined nor secured by specific mechanisms.	New media laws are in preparation. It is unknown if there will be changes in this area.	In practice, journalists have no specific mechanism available to protect themselves from either owners' or other actors' interference in their daily work.

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
EDITORIAL INDEPENDENCE RULES FOR PSB	YES	The Broadcasting Law prescribes the duty of PSB institutions to ensure that their programs are protected from any influence that may be exerted by the authorities, political organisations or economic centres of power (Article 78). However, the manner in which this should be ensured is not stipulated. PSB institutions should by themselves regulate, through their statutes, the internal organisation, the mode of operation, the manner in which to fulfil public interest and the rights and obligations of journalists (Article 93). Yet, these statutes do not contain any rules on the manner in which to achieve editorial independence from political influence.	A new law on PSB is in preparation but it is unknown if there will be changes in this area.	There are neither legal nor institutional guarantees for PSB editorial autonomy. PSB institutions in fact are close to those in power. They are not financially viable and therefore they are financially dependent on the state. The procedure prescribed for the formation of management bodies and enormous power in the hands of a single person (director general) render them extremely vulnerable to political influence.
JOURNALISTS' AUTONOMY - CONSCIENCE CLAUSE	YES	Journalists are explicitly guaranteed the right to refuse to obey a work order which would violate legal, professional or ethical rules or would contravene the editorial concept of a media outlet (Article 31, Public Information Law). There cannot be sanctions for such behaviour, such as loss of a job, salary cut or demotion.	No change. The Draft Public Information and Media Bill contains the same contentious clause.	There is no evidence that journalists often use this right.
JOURNALISTS' OPINION ON APPOINTMENTS AND DISMISSALS OF EDITORS IS REQUESTED	NO	There is no legal regulation of this right of journalists.	No change.	The voice of journalists in appointment of editors is very rarely respected. Still, basing on long tradition, some media do take into account the opinion of journalists in editors' appointments (daily Politika, for example).

DE JURE - RULES	YES / NO / PARTIALLY	DETAILS	TRENDS (e.g. relaxation, reinforcement)	DE FACTO - SITUATION (Comments)
LEGAL OBLIGATION FOR EMPLOYERS TO SIGN COLLECTIVE CONTRACTS ON LABOUR RIGHTS IN THE MEDIA	NO	Media laws only acknowledge the right of journalists to organize freely in their professional associations (Article 33, Public Information Law).	<p>No change.</p> <p>The Media Strategy does not deal with the economic status of journalists as an important problem in the media sector.</p> <p>None of the proposals (given by the trade unions) include employer's obligation to sign a collective contract were adopted.</p>	<p>Labour rights of media professionals are not protected beyond the minimum guaranteed by the Labour Act for all the other employed workers.</p> <p>Somewhat broader rights for journalists had been enforced by the Separate Collective Agreement for Graphics, Publishing, News and Film Industries, which expired in 2005.</p> <p>As of May 2011, there is not even the General Collective Agreement in place of the expired one, which was signed by employers, trade unions and the Government in 2008. Employers are not interested in collective bargaining.</p> <p>As a rule, trade union organisations do not exist in private media companies. Many journalists work without signing any form of labour contract.</p>

## REGIONAL OVERVIEW

DE JURE - RULES	ALBANIA	BIH	CROATIA	MACEDONIA	SERBIA
TRANSPARENCY/RULES FOR ALL MEDIA (MEDIA REGISTER, PUBLISHED REPORTS ETC.)	PARTIALLY	PARTIALLY	YES	PARTIALLY	PARTIALLY
SPECIFIC TRANSPARENCY RULES FOR PSB	PARTIALLY	YES	YES	YES	NO
TRANSPARENCY RULES FOR MEDIA REGULATOR(S)	YES	YES	YES	YES	YES
ANTI-CONCENTRATION RULES	YES	NO	YES	YES	PARTIALLY
CROSS-OWNERSHIP RULES	PARTIALLY	NO	YES	YES	PARTIALLY
BAN/RESTRICTIONS OF MEDIA OWNERSHIP FOR POLITICIANS	NO	PARTIALLY	PARTIALLY	YES	PARTIALLY
BARRIERS/THRESHOLDS FOR FOREIGN OWNERSHIP IN THE MEDIA	NO	YES	NO	NO	PARTIALLY
SEPARATE ANTI-MONOPOLY BODY FOR MEDIA INDUSTRY	NO	NO	NO	NO	PARTIALLY
GENERAL ANTI-MONOPOLY BODY IN CHARGE OF MEDIA CONCENTRATION	YES	YES	YES	YES	PARTIALLY
CONFLICT OF INTEREST RULES FOR MEMBERSHIP IN REGULATORY BODIES	YES	YES	YES	YES	YES
CONFLICT OF INTEREST RULES FOR GOVERNING BODIES OF PSB	YES	YES	YES	YES	YES
CONFLICT OF INTEREST RULES FOR MANAGEMENT OF PSB	YES	YES	YES	YES	PARTIALLY
CONFLICT OF INTEREST RULES FOR TOP MANAGEMENT POSITION IN A REGULATOR	NO	PARTIALLY	NO	NO	NO
CONFLICT OF INTEREST RULES FOR MEMBERS OF DECISION MAKING BODY ON MEDIA SUBSIDIES	N/A	N/A	YES	N/A	N/A
MERIT SYSTEM FOR NOMINATION AND APPOINTMENT OF MEMBERS OF A REGULATORY BODY	YES	YES	YES	YES	YES
MERIT SYSTEM FOR NOMINATION OF MEMBERS OF PSB GOVERNING BODIES	YES	PARTIALLY	YES	NO	PARTIALLY
BAN OF POLITICAL PROPAGANDA OUTSIDE ELECTION PERIOD	YES	PARTIALLY FOR PSB ONLY	YES	NO	YES
OBLIGATION OF FAIR AND BALANCED REPORTING	YES	YES	YES	YES	YES
EDITORIAL INDEPENDENCE RULES FOR PRIVATE MEDIA	PARTIALLY	NO	PARTIALLY	YES	PARTIALLY
EDITORIAL INDEPENDENCE RULES FOR PSB	PARTIALLY	YES	YES	YES	YES
JOURNALISTS' AUTONOMY - CONSCIENCE CLAUSE	NO	NO	YES	NO	YES
JOURNALISTS' OPINION ON APPOINTMENTS AND DISMISSALS OF EDITORS IS REQUESTED	NO	NO	YES	NO	NO
LEGAL OBLIGATION FOR EMPLOYERS TO SIGN COLLECTIVE CONTRACTS ON LABOUR RIGHTS IN THE MEDIA	NO	PARTIALLY	NO	NO	NO

## ECONOMY

### FACTS AND FIGURES ABOUT MEDIA ECONOMY

	ALBANIA 2012	BIH 2012	CROATIA 2012	MACEDONIA 2012	SERBIA 2012
TOTAL AMOUNT OF ADVERTISING PER YEAR (GROSS AMOUNT)	54.5 million euro (EST)	50.46 million euro	196 million euro	N/A	172 million euro
BREAKDOWN OF TOTAL AMOUNT OF ADVERTISING FOR TELEVISION, RADIO, PRINT, ONLINE PER YEAR	N/A	TV: 33.7 million euro Radio: 2.5 million euro Print: 8 million euro Internet: 1 million euro Outdoor: 5 million euro (EST)	TV: 92.7 million euro Radio: 21.5 million euro Print: 50.7 million euro Internet: 11.9 million euro	N/A	TV: 97 million euro Radio: 9 million euro Print: 36 million euro Internet: 12 million euro Outdoor: 18 million euro
THREE BIGGEST ADVERTISERS	N/A	Procter&Gamble, Henkel, Coca-Cola	Agrokor, Henkel, T-HT	Coca-Cola, Euroimpex, ONE	Procter&Gamble, Beohemija, Telekom Srbije
THREE BIGGEST ADVERTISERS AMONG DOMESTIC COMPANIES OR INSTITUTIONS	N/A	BH Telekom, Eronet, M:tel	Agrokor, Podravka, Grupa	Euroimpex, Government, Pivara Skopje	Beohemija, Telekom Srbije
ANNUAL AMOUNT OF MEDIA SUBSIDIES	N/A	Overall data N/A; The Government of RS provided 1.87 million euro for media in 2012 and 9 million euro in 2009-12; Cantonal and municipal public media regularly receive 7,87 million euro per year	N/A	There are no subsidies.	25 million euro
NUMBER OF MEDIA	N/A	276 (EST)	1149 (TV - 31 ; Radio - 150 ; Press - 865 ; Portals - 103)	184 (129 broadcast , 10 print dailies, 45 online news)	1,156 (Press - 647, broadcast - 319, online - 133, other - 57)
NUMBER OF TELEVISION CHANNELS	81	44 (12 public, 32 private) + 3 PSB	31	77	91

	ALBANIA 2012	BIH 2012	CROATIA 2012	MACEDONIA 2012	SERBIA 2012
NUMBER OF DAILY NEWSPAPERS	26	9	12	10	20
NUMBER OF ONLINE NEWS MEDIA	N/A	80 (EST)	103	45	103
CIRCULATION OF EACH OF TOP THREE DAILY NEWSPAPERS	N/A	12,860 copies per news-paper (EST)	24 sata - 125,194 Večernji list - 62,494 Jutarnji list - 58,948 (sold copies)	Vešt - 15,000 Dnevnik - 9,000 Nova Makedonija - 6,000 Utrinski vesnik - 5,000	ALO - 118,461 Večernje novosti - 116,919 Blic - 115,779
COST OF 1 MINUTE ADVERTISING IN PRIME TIME AT THE COMMERCIAL TV PROGRAM WITH HIGHEST AUDIENCE SHARE	N/A	Pink BIH: 6,120 euro	RTL: approx. 33,000 EUR	TV Sitel: 600 - 1,500 EUR	TV Pink: 9,540 EUR
NUMBER OF JOURNALISTS WITH FULL TIME EMPLOYMENT	3,100 (EST)	2,000 - 3,500 (EST)	4,923	1,129	above 4,000 (EST)
NUMBER OF JOURNALISTS WITH FULL TIME EMPLOYMENT WITH OTHER THAN FULL TIME EMPLOYMENT (CONTRACTS, SELF-EMPLOYED ETC.)	2,200 (EST)	1,574 - 2,755 (EST) average 2,164 journalists	N/A	850-900	N/A
NUMBER OF MEMBERS OF ASSOCIATION OF JOURNALISTS (INDICATE SEPARATELY NUMBER OF ACTIVE JOURNALISTS AMONG MEMBERS, IF THERE ARE ALSO RETIRED JOURNALISTS IN THE EVIDENCE)	860 (EST)	426 - 745 (EST)	N/A	N/A	N/A
NUMBER OF MEMBERS OF ASSOCIATION OF JOURNALISTS (INDICATE SEPARATELY NUMBER OF ACTIVE JOURNALISTS AMONG MEMBERS, IF THERE ARE ALSO RETIRED JOURNALISTS IN THE EVIDENCE)	N/A	1,077 Association of Journalists of Republika Srpska 327, Association of BH jour-nalists 750	2,797	N/A	UNS - 6,767 NUNS - 3,483 NDNV - 545
NUMBER OF JOURNALISTS ORGANISED IN NATIONAL TRADE UNION	870	1,800 (EST)	2,800 (EST) Croatian Journalist Union	770 (EST) (570 + PBS 200)	above 400 (EST)
NUMBER OF JOURNALISTS ORGANISED IN TRADE UNION SECTION WITHIN BIGGEST COMMERCIAL TV BROADCASTER	N/A	N/A	N/A	31	0

	ALBANIA 2012	BIH 2012	CROATIA 2012	MACEDONIA 2012	SERBIA 2012
NUMBER OF UNEMPLOYED JOURNALISTS	N/A	625 (530 journalists + 86 communicologists)	599	500 - 700	1,209
AVERAGE WAGE FOR JOURNALISTS IN THE COUNTRY	320 euro (EST)	407 euro (EST)	N/A	250 euro	300 euro (EST)
AVERAGE WAGE IN THE MEDIA	390 euro (EST)	425 euro (EST)	N/A	250 euro	N/A
HIGHEST WAGE FOR JOURNALISTS IN THE MEDIA	1,500 euro	1,280 - 1,800 euro (EST) in exceptional cases, 820 euro more frequent	9,000 euro (EST) in Jutranji list (EPH)	500 euro	N/A
LEGEND:	EST - estimation	N/A - no answer			
SOURCES:					
ALBANIA:	Abacus Research, IREX Media Sustainability Index 2013; Authority of Audiovisual Media; Albanian Media Institute; Union of Albanian Journalists.				
BOSNIA AND HERZEGOVINA:	Advertising Agency Fabrika; IREX MSI report 2013; Data basis of Center for Investigative Journalism, Cin: <a href="http://www.cin.ba/vlada-rs-a-dala-medjima-vise-od-33-miliona-km/">http://www.cin.ba/vlada-rs-a-dala-medjima-vise-od-33-miliona-km/</a> ; Magazin: <a href="http://www.media.ba/bs/magazin-medjiska-politika-regulativa/majmumi-najavnom-servisu">http://www.media.ba/bs/magazin-medjiska-politika-regulativa/majmumi-najavnom-servisu</a> ; Communication Regulatory Agency: <a href="http://www.rak.ba/bih/index.php?uid=1273787112">http://www.rak.ba/bih/index.php?uid=1273787112</a> ; Press Council: <a href="http://www.vzs.ba/index.php?option=com_content&amp;view=article&amp;id=200dnevne-novine-u-bih&amp;catid=55&amp;Itemid=8">http://www.vzs.ba/index.php?option=com_content&amp;view=article&amp;id=200dnevne-novine-u-bih&amp;catid=55&amp;Itemid=8</a> ; Gemius Audience; Freedom House; Marketing office of Pink BH (20 August 2013); Dragan Jerinić, Association of Journalists of Republika Srpska, and Borka Rudić, Association BH Journalists (August – September 2013); Amer Ioskić, Representative of Trade union of graphics, publishers and media workers in FBiH, and Marijana Sarčević, Trade union of Media and Graphics in RS (August 2013); Bulletin of Employment Agency RS for 2012; Marijana Ibišević, Employment Agency FBiH (August 2013); Agency for Statistics BiH.				
CROATIA:	Hura: <a href="http://hura.hr/objave-za-medije/">http://hura.hr/objave-za-medije/</a> ; JATrgovac: <a href="http://www.jatrgovac.com/2013/03/tv-oglasavanje-tko-sto-kada-i-koliko-gleda/">http://www.jatrgovac.com/2013/03/tv-oglasavanje-tko-sto-kada-i-koliko-gleda/</a> ; Agency for Electronic Media; Croatian Chamber of Economy; Agency for Electronic Media: <a href="http://www.e-mediji.hr/nakladnici/tel-evizijski_nakladnici.php">http://www.e-mediji.hr/nakladnici/tel-evizijski_nakladnici.php</a> ; Census 2011; Croatia Journalists Association: <a href="http://www.snh.hr/index.php?jezik=hr&amp;idMenu=1">http://www.snh.hr/index.php?jezik=hr&amp;idMenu=1</a> ; Croatian Employment Service; Index HR: <a href="http://www.index.hr/">http://www.index.hr/</a>				
MACEDONIA:	Market analysis of the Broadcasting Council (2012): <a href="http://www.avmu.mk">http://www.avmu.mk</a> ; Macedonian institute for Media; Agency for Audio and Audiovisual Media Services; Trade Unions of Journalists.				
SERBIA:	AGB Nielsen; Media Strategy; Register of Public Media, September 2012; EurActiv: <a href="http://www.euractiv.rs/mediji/4638-strategija-40-bojih-medija-u-srbiji.html">http://www.euractiv.rs/mediji/4638-strategija-40-bojih-medija-u-srbiji.html</a> ; ABC Serbia <a href="http://www.abcserbia.com/images/stories/vesti/National_Newspapers_total_circulation_30_12_13.pdf">http://www.abcserbia.com/images/stories/vesti/National_Newspapers_total_circulation_30_12_13.pdf</a> ; TV Pink: <a href="http://www.rtvpink.com/">http://www.rtvpink.com/</a> ; Media associations; Biro za društvena istraživanja Tvoj stav: <a href="http://www.tvojstav.com/results/EseqEKvBjhmULrW6nvxn/novinar-i-novinarstvo-u-srbiji">http://www.tvojstav.com/results/EseqEKvBjhmULrW6nvxn/novinar-i-novinarstvo-u-srbiji</a> ; National Employment Agency; RTS's official price list: <a href="http://static.rtv.rs/pdf/2013/07/22/izvestaj-nezavisnog-revizora-za-2012-g-pdf.pdf">http://static.rtv.rs/pdf/2013/07/22/izvestaj-nezavisnog-revizora-za-2012-g-pdf.pdf</a> .				

## FACTS AND FIGURES ABOUT PUBLIC SERVICE BROADCASTERS ECONOMY

	ALBANIA 2012	BIH 2012	CROATIA 2012	MACEDONIA 2012	SERBIA 2012
TOTAL BUDGET OF PSB	13,250,874 euro	RTRS: 11,776,785 euro BHRT: 21,895,731 euro RTVFBH: 15,816,762.2 euro	173,104,032.8 euro	22,898,211 euro	RTS - 139,504,000 euro RTV - 26,891,000 euro
LICENCE FEE (MONTHLY AMOUNT PAID BY HOUSEHOLDS)	0.766 euro	3.76 euro	10.44 euro	3.10 euro	4.40 euro
PERCENTAGE OF TOTAL BUDGET FROM LICENCE FEE	45%	RTRS: 6,702,357 euro (56.91%) BHRT: 12,249,256 euro (56.17%) RTVFBH: 6,458,499.5 euro (40.83%)	81.66 % 154,324,330.2 euro	Macedonian Television - 67.76% Macedonian Radio - 71.19%	RTS - N/A RTV - 95%
PERCENTAGE OF TOTAL BUDGET FROM ADVERTISING	9%	RTRS: 1,778,715 euro (15.4%), BHRT: 1,958,795 euro (8.98%), RTVFBH: 6,297,372.5 euro (39.81%)	9.37 % 17,711,004.09 euro	Macedonian Television - 6.1% Macedonian Radio - 4.67%	RTS - N/A RTV - around 4%
PERCENTAGE OF TOTAL AMOUNT OF LICENCE FEE ACTUALLY COLLECTED FROM LIABLE HOUSEHOLDS	89%	Officially 73.94%, but possibly lower, reaching 46.50%	96%	36.75% 4.32 million euro	around 36% (15% in least developed areas, to 65% in most developed ones)
NUMBER OF EMPLOYEES IN PSB	933	1,841 (RTRS: 512, BHRT: 963, RTVFBH: 366)	3,368 in addition, HRT hires app. 3,700 stringers	873 (TV 597, Radio 276)	RTS - 3,247 RTV - 1,251
NUMBER OF JOURNALISTS IN PSB	115	Whole country - N/A RTRS: 130 BHRT: 218 (EST) RTVFBH: N/A	N/A	320 TV 148 + 42 (eds.), RA 85 + 45 (eds.)	683 (at TV part of RTS)
AVERAGE WAGE FOR JOURNALISTS IN PSB	420 euro	RTRS: 560 euro net BHRT: 534 euro RTVFBH: N/A	1,414 euro gross (EST)	290 euro net / 400 euro gross	unknown for journalists, 406 euro for RTS employees

	ALBANIA 2012	BIH 2012	CROATIA 2012	MACEDONIA 2012	SERBIA 2012
BIGGEST WAGE FOR JOURNALISTS IN PSB	512 euro	RTRS: 818 euro net BHRT: N/A, RTVFBH: N/A	3.926 euro (EST)	370 euro net / 530 euro gross	N/A
TOTAL NUMBER OF JOURNALISTS ORGANISED IN TRADE UNION SECTION WITHIN PSB	app. 60% of journalists	RTRS: 330, BHRT: 689, RTVFBH: 240	N/A (there are around 10 unions)	200 (EST)	app. 100 TU members in TV only in RTS
COST OF 1 MINUTE OF ADVERTISING IN PRIME TIME IN TV PROGRAM OF PSB WITH HIGHEST AUDIENCE SHARE	178 euro	RTVFBH: 2,450 euro - 3,100 euro	HTV: app. 2,744 euro	MRT 1: 90 - 150 euro	RTS: 9,180 euro
LEGEND:	EST - estimation	N/A - no answer	eds. - editors	app. - approximately	
SOURCES:					
ALBANIA:	RTSH Annual Report 2012, Albania Census 2011, RTSH Human Resources Department, Union of Journalists.				
BOSNIA AND HERZEGOVINA:	RTRS and RTV BiH annual reports; Data on FBiH from the CRA report "Analysis of Broadcasting Market", available at: <a href="http://rak.ba/bih/index.php?uid=1381314621">http://rak.ba/bih/index.php?uid=1381314621</a> ; RTRS and BHRT annual reports; the CRA report "Analysis of Broadcasting Market", available at: <a href="http://www.media.ba/bs/magazin-medijaska-politika-regulativna/argumenti-za-odluku-rak">http://www.media.ba/bs/magazin-medijaska-politika-regulativna/argumenti-za-odluku-rak</a> ; Mirza Huskić, representative of the Autonomous Trade Union of Employees of Public Service Broadcasting; Siniša Mihajlović, representative of the Trade Union of RTRS Employees (August 2013); RTVFBH website.				
CROATIA:	HRT annual audit report; HRT, source available at: <a ?p='22"' href="http://www.hrt.hr/.../2013_PROGRAM_RADA_i_FINANCIJSKI_PLAN_HRT-; Zuta ekonomija, available at: &lt;a href=" http:="" zutaekonomija.neno-pregije.iz.hr="">http://zutaekonomija.neno-pregije.iz.hr/?p=22</a> ; Monitor, available at: <a href="http://www.monitor.hr/vijesti/place-od-16-do-30-ti-suca-kuna-za-zvijezde-hrv-a/81715/">http://www.monitor.hr/vijesti/place-od-16-do-30-ti-suca-kuna-za-zvijezde-hrv-a/81715/</a> ; HRT, source available at: <a gjencik="" href="http://www.hrt.hr/gjencici/gjencik-izborne-promidzbe-za-2013-godinu; RTL, source available at: &lt;a href=" http:="" rtl_gjencik.pdf"="" sales="" static="" www.rtl.hr="">http://www.rtl.hr/static/sales/gjencik/RTL_gjencik.pdf</a> .				
MACEDONIA:	Agency for Audio and Audiovisual Media Services, available at: <a href="http://www.avmu.mk; Legal Dpt. Macedonian Radio and Television; Trade Union of Journalists in the PSB; PSB Marketing Dpt., available at: &lt;a href=" http:="" marketing.aspx"="" mk="" www.mtv.com.mk="">http://www.mtv.com.mk/MK/marketing.aspx</a> .				
SERBIA:	Business Registers Agency; RTS Director General; Radojković, 2012, CM, 24 (2012), pp. 59-74.; Radnik, source available at: <a href="http://www.radnik.rs/forum-socijalnidijalog/259-na-rts-u-vise-clanova-sindikata-neko-zaposlenih">http://www.radnik.rs/forum-socijalnidijalog/259-na-rts-u-vise-clanova-sindikata-neko-zaposlenih</a> .				

