

# MEDIA SECTOR REFORM

# PRIEBE'S RECOMMENDATIONS AND OTHER ISSUES



*Citizens for change!*



**MEDIA  
DEVELOPMENT  
CENTER**

# MEDIA SECTOR REFORM PRIEBE'S RECOMMENDATIONS AND OTHER ISSUES



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# CONTENT

- 05** MEDIA SECTOR REFORM - PRIEBE'S RECOMMENDATIONS  
AND OTHER ISSUES
- 07** RECOMMENDATIONS OF THE GROUP OF SENIOR EXPERTS  
(THE PRIEBE REPORT)
- 10** RELIEVE THE MEDIA FROM ALL FORMS OF POLITICAL PRESSURE
- 12** MEDIA AND POLITICAL PARTIES – DISTANCE FROM PARTY POLITICS
- 14** PUBLIC BROADCASTING SERVICE AND ITS INDEPENDENCE  
AND IMPARTIALITY
- 16** PUBLIC BODIES AND INSTITUTIONS AND MEDIA
- 18** DEFAMATION
- 19** END TO THE PRACTICE TO “BUY” POLITICAL SUPPORT OF THE MEDIA
- 21** MEDIA OWNERSHIP AND FINANCING TRANSPARENCY
- 23** WORKING CONDITIONS AND SELF-CENSORSHIP
- 25** AUDIOVISUAL REGULATORY BODY
- 27** CONCLUSIONS



# MEDIA SECTOR REFORM

# PRIEBE'S RECOMMENDATIONS AND OTHER ISSUES

**R**eform of Macedonian media scene is of utmost importance. Its numerous problems result in an unsustainable media system, a market overcrowded with players which are easily susceptible to political influence. The first victims of that situation are the professional standards of journalism with journalists, especially in the pro-government media, acting primarily as spokespersons and mouthpieces of public affairs department of different political parties.

For several years in a row, all studies, analyses, reports prepared by international media and human rights organizations, has noted and underlined that negative trend. Such were the remarks on situation in areas of freedom of expression and media freedoms in the annual re-

ports of Reporters without Borders<sup>1</sup>, Freedom House<sup>2</sup>, IREX's Media Sustainability Index<sup>3</sup>, European Commission's progress report on Macedonia. Equally negative are the opinions and remarks presented in the reports and analysis of the media industry and its client-patron relations with the government, presented by the Macedonian expert and media community. A common denominator of all such documents is that the media in Macedonia, because of the continuous degradation and deterioration of media freedoms and pluralism in the media, lose the capacity to properly perform their main functions – the control the centres of power, the workings of the Government, and to provide diverse contents that will articulate the different needs and interests in Macedonian society.

1 Reporters without borders, <https://rsf.org>

2 Freedom House, <https://freedomhouse.org/>

3 IREX, <https://www.irex.org/resource/media-sustainability-index-msi>

The general public, too, recognizes the problems in the area of media independence and freedom. The citizens clearly articulate their awareness of the lack of freedom of media. One public opinion survey, conducted in 2012 by the Institute for Social, Political and Juridical Research<sup>4</sup>, found that two thirds of the polled citizens disagreed with the statement “Media in Macedonia can be trusted” – 23 percent said they disagree with that statement completely, and other 47 percent said they disagree. The responses to the statement “Media in Macedonia are not under pressure and can report freely”, were similar, with 72 percent of the polled disagreeing – 45 percent disagreed, 27 disagreed completely.

At the same time, the citizens precisely, in spite of the efforts of all the spin-doctors, identified the sources of media capture and sources of greatest pressure – the government with 40 percent, government and owners 28 percent, and owners with 14 percent.

The distribution of responsibility for pressure on the media and newsrooms indicates the main source of weakness and vulnerability of the media scene – the low economic/financial sustainability in the oversaturated media market. Namely, the media fight over very limited available advertising revenue, which is far from enough to allow all media to report positive balance sheet and, as a result, a huge number of media depend on other sources of financing. AVMS’s reports on the state of broadcasting market indicate that only the national terrestrial TV broadcasters reported positive balances on their annual balance sheets, and all other commercial broadcasters operate at a loss.

The incumbent government, that is, the leading party in the coalition that ruled Macedonia for the past ten years, used every opportunity to establish firm control over as many

media as possible, with a focus on the most influential national TV networks. The pressure on the media to adopt pro-government editorial policies – or to be turned into channels for dissipation of government’s propaganda – while politically motivated, mostly manifested itself as economic pressure. All the time, the government was holding the stick, but also offered the proverbial carrot. Media owners faced restrictions to their access to the advertising market in a situation in which the government, which controlled a huge part of the available advertising revenue being itself the leading or one of the leading advertisers in the country, also dictated the spending of advertising budgets of other economic entities, such as public enterprises, share-holder companies with dominant state ownership, and even the advertising budgets of private companies. On the other hand, the owners of leading mainstream media and their diverse business interests were offered the carrot in the form of access to the lucrative government contracts (also, public contracts with public enterprises and local administrations). The owners, properly “motivated”, transferred the pressure to their newsrooms, pressuring their journalists towards self-censorship and editorial policies that favoured the government.

On a parallel track, the government, often through the pro-government media and following the lines of deep political divisions in Macedonian society, pressured the critical/pro-opposition media who faced permanent harangue against them and accusations of “treason” and “betrayal” of the state, or being “mercenaries that serve foreign interests”, of being “Sorosoids”. Critical media and journalists, like all other sources of dissent, are also targets of more or less open hate-speech and public threats against their physical integrity.

4 Babunski, K., Pressure on media – democracy under question, Annual of ISPJR 2012, year XXXVI, number 2, Institute for Social, Political and Juridical Research, Skopje, p.41-52, <http://www.isppi.ukim.edu.mk/post.php?id=130>

# RECOMMENDATIONS OF THE GROUP OF SENIOR EXPERTS (THE PRIEBE REPORT)

The agreement between the four leading political parties of July 2016 (finalized on August 31, 2016) stipulates that Macedonia should soon enter a period of urgent changes of media legislation. The four parties’ leaders agreed that, in the first six months after the elections, they shall prepare changes to the media legislation to implement and integrate the “Urgent Reform Priorities”<sup>5</sup> and the “Recommendations of the Senior Experts’ Group on systemic Rule of Law issues relating to the communications interception revealed in Spring 2015”, the so-called “Pribe Report”<sup>6</sup>.

The “Pribe Report” precisely locates the problems of Macedonian media sector, that is, the influence of politics over media and news-

rooms that takes the form of primarily economic and judicial pressure, and the insufficient independence and transparency of regulatory bodies and the public broadcasting service.

The recommendations have several aims and goals. The first aim is the increase the resistance of media to external pressure - economic, political and judicial - and to eliminate all instruments and opportunities to holders of political and economic power to pressure the media. The second goal is to strengthen the public broadcasting service, in terms of its editorial and financial independence, allowing it to take its place as the central pillar of the national broadcasting system, especially in the area of information. Finally, one general goal is to allow the media and journalists to engage in compre-

<sup>5</sup> See at URL [https://eeas.europa.eu/sites/eeas/files/urgent\\_reform\\_priorities\\_en.pdf](https://eeas.europa.eu/sites/eeas/files/urgent_reform_priorities_en.pdf)

<sup>6</sup> See at URL [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/news\\_corner/news/news-files/20150619\\_recommendations\\_of\\_the\\_senior\\_experts\\_group.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/news_corner/news/news-files/20150619_recommendations_of_the_senior_experts_group.pdf)

hensive, objective reporting of social events, trends, developments and situations and to perform their role of independent watchdog over spending of public funds and performance of public administration and government.

Recommendations can be divided into several groups – into recommendations that need legislative interventions and those that rely on combination of self-regulatory and regulatory instruments and activities and strengthened professional and ethical standards by all stakeholders, media, journalists, but also elected and appointed public officials, political parties and the business community.

The recommendations can be divided into several thematic groups. One group of recommendations refers to the manner in which media approach politics, in terms of their obligation to report on activities of political parties, public governance and administration, elected and appointed officials, civil servants, and the media's ability to perform that reporting freely, in accordance with professional standards of journalism, their convictions and beliefs and their duty towards the general public.

The second group of recommendations cover the independence of the public broadcasting service and its ability to contribute to an informed citizenship, the third refers to the elimination of the possibility to use the defamation legislation and related judicial practice as means to exert pressure on journalists and media. Two recommendations refer to transparency of media ownership and financing, an issue closely related to the recommendation on strict regulation of spending of promotion and public campaign budgets managed by different bodies of public government and administration, at different levels (national and local). The last recommendation refers to improved working conditions in newsrooms, to battle the prevailing self-censorship practices among journalists.

The implementation of "Priebe Report" recommendation will have to take into account several aspects of tradition of regulation of media landscape and operations of media. We should also bear to mind the experiences of past implementation of media legislation by the regulatory authority, especially over the past several years, when both the former Broadcasting Council and the current Agency for Audio and Audiovisual Media Services remained passive, in spite of evidence indicating that the situation in the area of media freedoms in Macedonia continuously deteriorates. Ultimately, it means that Macedonia has a tradition of insufficient and inadequate media

regulation and sustained and substantial media policies.

The first aspect we have to consider is the fact that traditionally, it is the broadcasting sector that has been regulated, due to the fact that broadcasting of radio or television programmes used a part of radio spectrum that is considered a limited public resource, thus subject to regulation. Even the prolonged processes of liberalisation and digitalisation of television and radio markets and industry, the tradition of regulation of broadcasting sector, in all aspects of its functioning, remains. That is especially true in the areas of allocation of free-to-air, using digital terrestrial multiplexes, broadcasting permits or licenses, while procedures for allocation of permits for cable or satellite broadcasting have been simplified and made more straightforward.

Print media and the so-called electronic publications (media that publishes solely on the internet but adhere to and apply the standards and principles established by the traditional mainstream media), as well as the internet-native new media, are left to self-regulation instruments. We should, however, bear to mind that latest trends coming from UK and Ireland, primarily, to replace self-regulatory bodies for print and online media with independent regulatory bodies.

In spite of that tradition of legislative and regulatory interventions in broadcasting, which imposes on commercial media certain public-service obligations – to inform, entertain and educate – and the manner in which they are to meet those obligations, such as professional standards and programming requirements, the media remain entitled to the right to choose their editorial policies, political or ideological position. In the European legal tradition that considers all broadcast media as having public-service role, in spite of the freedom to choose editorial policies, there are many countries in which broadcasting or audiovisual regulatory bodies define the professional standards of journalism and reporting in appropriate codes, observe their implementation and sanction violations of those standards.

Journalists and media are protected by the universal right to freedom of expression, which can be limited only in accordance with the provisions on the three-part test listed in Article 19 of the International Covenant on Civil and Political Rights<sup>7</sup> and Article 10 of the European Convention on Human Rights<sup>8</sup>. Therefore, any attempt to expel a person or a media from the public discourse, unless they have committed a violation of legally prescribed restrictions of



the freedom of expression, that meet the requirements of the three-part, constitutes a form of censorship.

The performance of journalistic profession is guided by sets of professional principles of conduct and journalists are accountable for any violation of those principles to their fellow journalists and to the public. For Macedonia, the relevant codes or lists of professional journalistic principles are the International Federation of Journalists’ Declaration of Principles on the Conduct of Journalists and the Code of Journalists of Macedonia. With exception of the public broadcasting service, for which it is a legal obligation, and several biggest media outlets, the majority of media lack proper self-regulatory statutes or instruments to regulate the professional conduct of journalists in their editorial offices, which would allow them to respond correctly to complaints presented by members of their audiences.

New technologies and Internet brought about major changes to the media landscape. In addition to media convergence, the ability to apply multimedia approach and combine text, audio and video on the websites of all media, whether print or broadcasting, there are also various new media initiatives, from news portals and sites, to forms of citizen journalism like blogging, and the social networks and the social media. Those changes were not limited only to the area of production and distribution of contents and news, but caused a major shift of the whole media market, offering advertisers new possibilities and options in decisions related to their media buying practices and placement of their advertising budgets.

Therefore, it is clear that media legislation can implement only the recommendations referring to the public broadcasting service and the audiovisual regulatory authority, as well as the recommendation related to transparency of media ownership and financing. Other legislation regulates issues related to defamation (the Law on Civil Liability for Defamation and changes in the judicial practice), the issues of government promotion campaign and “government advertising”, and the possibility to “invest” public funds in the media industry or public subsidies for the media. The other rec-

ommendations, referring to liberation of media from political pressure or intimidation; the distancing of media from party politics; the restraint of public bodies from discouraging the media to perform their duties; the demand from politicians to restrain from abuses of defamation actions to pressure the media, can be resolved through a combination of regulatory and self-regulatory instruments.

“Priebe Report” recommendations, while not explicitly saying it, should lead to a situation in which the journalists and media will get as close as possible to their obligation to provide comprehensive and objective reporting on social events, developments and situations and involved protagonists and actors. It should not reflect on their ability and right to support or represent certain value or ideological systems or doctrines. Naturally, for as long as their adopted ideological positions don’t interfere with the obligation to provide comprehensive and objective reporting.

Since the release of the “Priebe Report”, several concrete proposals for changes to media legislation were presented. That was, above all, the proposal by mediator Peter Vanhoutte, endorsed by the Association of Journalists of Macedonia, but also the Blueprint for Urgent Democratic Reforms<sup>9</sup>, prepared by a group of civic organizations. MDC agrees with the general intent and direction of those proposals. However, we reserve the right to hold differences in the manner of approach and resolution of individual issues covered by those documents. It is not the purpose of this document to comment on those proposals, although it may mention some of the already proposed solutions.

Following is a short overview of recommendations listed in the “Priebe Report”, with a brief elaboration of the directions in which the debate on their implementation and possible interventions in existing legislation should take. Having in mind that the “Priebe Report” doesn’t explicitly mention the audiovisual regulatory body, the Agency for Audio and Audiovisual media Services, in spite of the fact that it was recognized as one of the key areas of intervention by the stakeholders, we added several paragraph related to the necessary reforms to allow it to function independently.

7 ICCPR <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CCPR.aspx>

8 European Convention on Human Rights, [http://www.echr.coe.int/Documents/Convention\\_ENG.pdf](http://www.echr.coe.int/Documents/Convention_ENG.pdf)

9 Available on the website of the Institute of Communication Studies [http://iks.edu.mk/attachments/article/274/BP\\_ENG\\_FINAL\\_08.07.2016.pdf](http://iks.edu.mk/attachments/article/274/BP_ENG_FINAL_08.07.2016.pdf)

# RELIEVE THE MEDIA FROM ALL FORMS OF POLITICAL PRESSURE

**T**he relationship between media and politics is complex and seemingly unavoidable. In essence, it is about permanent contest to establish oneself in a position of power. Political parties, as formal organisations for articulation and (should they take power) implementation of real policies in all areas of public affairs and public matters, and they need the media as a necessary channel for communication of their ideas, positions and policies to the citizens. Their fundamental interest is for the media to act, as much as possible, as passive communication channels that will merely transmit the messages, without critical or analytical consideration of messages they carry or policies to which those messages refer.

Macedonian media have been subject to systematic pressure by ruling parties for almost a decade. The main goal of that pressure was to ensure that leading, most influential media, primarily TV stations with national terrestrial

licences, would adopt a pro-government editorial policies and become channels for transmission of government's propaganda.

The political pressure mostly manifested itself as economic pressure, and the government unscrupulously abused the systemic problems of unsustainable media market in Macedonia. In a situation when huge number of media fight over an extremely limited advertising revenue, the government uses the control that it has over spending of advertising budgets (both of the public promotion funds and budgets of private advertisers) to exert direct control over media outlets' editorial policies. The second line of economic pressure relies on the client-patron relationship the government has established with media owners who are then expected to discipline their newsrooms and put their media at disposal to ruling parties' propaganda needs.

The pressure is also judicial, through defamation action cases against journalists, criminal prosecution on trumped-up charges, but

also through limiting and restricting journalists' access to information or refusal to take or complete disregard of their questions and inquiries. Last, but not the least, a large number of critical journalists are exposed to constant verbal abuse and insults, being labelled as "traitors" or "mercenaries", working for the opposition or foreign interests by their critical reporting of government and its practices and policies.

Threats against journalists' physical integrity and hate-speech are relatively common, as are cases of physical assaults on journalists or their property, issue well documented in the depressive statistics kept and published by the Association of Journalists. In addition, such attacks are never properly investigated and processed and, to this day, no person or persons were held responsible or sanctioned for them.

All forms of pressure by the ruling parties result in a wide-spread self-censorship, deteriorating quality of reporting on current events and affairs, and huge misbalance in the treatment of different political entities (parties and politicians), naturally, in favour of the government. Thus, the government has transformed editorial offices into *de facto* departments of its public relations offices, their sole task to promote or praise the "successes" of the ruling parties and completely ignore all the other actors of political life, including the opposition parties, civil society and a huge segments of the population.

In the small, impoverished and overcrowded media market, the media have only limited ability to resist such politically motivated pressure. Any demonstration of integrity, personal or institutions, is considered unacceptable in Macedonian politics, and may produce serious consequences. Disobedient media can be shut down, brought to bankruptcy through restriction of their access to the advertising market and advertisers. Disobedient journalists could lose their jobs or, if they investigate topics that they should stay away from, end in prison, sentence on trumped-up charges.

In a situation in which the political parties are engaged in a permanent election campaign, knowing that holding early elections has become quite a regular practice, the government has disproportionately greater power to secure for itself the support of the media than the opposition. The ruling party has taken firm control of all instruments of power – economic and political, above all – and shows no restraint in using them to put pressure on all those who oppose or criticise its policies and manner of governing.

The implementation of this recommendation – to free the media from all forms of political pressure (individual manifestations of politically motivated pressure are subject to other recommendations in the Priebe Report) – depends, as we noted, on the ability of the media to resist the economic pressure. In the current media market, that is near impossible, unless media owners are prepared to work at a loss, without any profits.

The freedom of media from pressure is also a matter of awareness in society about the importance of media as a pillar of functioning democracy. Violations of media freedoms by political parties is seen as matter that citizens should punish come election time. However, without media free of political domination, we can't have truly informed citizens capable of competently expressing their will, including the will to punish politicians for their actions against media freedom.

The problem of political pressure can be resolved, first of all, by media gaining economic strength. It requires a faster economic growth and consolidation of the media market, thus denying the government its strongest instruments for pressure over the media, such as the ability to act in the advertising market as media buyer. It would also require strengthened social awareness about the importance of independent media for the democratic development of the country, both among the citizens/voters, and among holders of politically nominated or elected offices.

These solutions are available, sadly, only in the long run. Short term, we propose couple of approaches that could improve the situation, albeit without any tangible guarantees towards a positive effect.

*The media should be more decisive and demonstrate higher level of integrity and publicly disclose all forms and attempts of political pressure against them. In that effort, they will need the assistance from the citizens, who should put pressure on the institutions to investigate and resolve all cases of violence and threats of violence (physical or economic) against the media and the journalists.*

*If the pressure on media is applied through abuse of the power of elected or appointed holders of public office or abuse of public funds (the main source of economic pressure on media), the legislation, both anti-corruption and criminal laws, should prescribe proper adequate sanctions for such actions. Also, instruments need to be established, through the implementation of other recommendations listed in the "Priebe Report", to ensure that all such cases will be properly investigated and processed..*

# MEDIA AND POLITICAL PARTIES – DISTANCE FROM PARTY POLITICS

**T**he question of relations between politics, that is, political parties and media is always valid and open. The media perform two important functions, as reporters and creators of public opinion, of crucial importance for the political parties in the struggle for votes in their attempt to secure majority in the parliaments. Therefore, political parties are definitely interested to influence the reporting of the media, as well as the manner in which the media interpret the events, development and situations in a society. The buying of advertising time or space during election campaigns, and public relations and propaganda (whether black or positive), are the only methods available to them, although not all of them are considered acceptable.

Throughout history, the media have had the right to choose an ideological or political system of values that they may promote or advocate for. That is primarily the case with print media and, in more recent times, the online media. They can openly support policies and ideas shared with some political party. Having

in mind that these are primarily privately owned media, often established with the specific purpose to secure social influence or status to the owner or owners, who risk their own money, the general approach has been to avoid any attempt of regulation outside the established regulatory practices and the personal decision of each individual citizen which newspaper or other media he or she will purchase and follow.

As an illustration, in France, Italy or the UK, as well as other western democracies, the actual position in the political spectrum held by the leading print media is well known and is hardly a secret. In France, for instance, it is an established fact that *Le Croix* is the paper of the Catholic demo-christians, *Le Figaro* is right-wing, *Libération* is the paper of the centre-left option, and *L'Humanité* is the paper of the extreme, communist left. Similarly, in Italy, *Corriere della Sera* is centrist paper, *La Stampa* is liberal, *La Repubblica* is the paper of the centre-left, cultural liberals, *Il Giornale* is conservative, and *Il Manifesto* is close to the far left politics. Another fine illustration is the division between print media

in Great Britain on the issue of the “Brexit” and whether they supported the “leave” or “remain” vote. In Macedonia, we have a whole series of information and news sites and portals established for the specific purpose to provide media support to individual political parties. Much more questionable is the practice to change ideological or political positions with every change of government, because owners believe that “every government is God-given” and because it would allow them to protect their own economic or political interests.

In spite of contemporary trends for newspapers to move towards non-partisan and politically neutral editorial policies, there are still countries in which it is quite normal and acceptable for political parties to have their official media, usually daily or weekly newspapers that enter market competition. In Italy, *L’Unita* was long the official newspaper of the Communist Party, while in Germany, the *Neues Deutschland* remains the official newspaper of the socialist Die Linke (Left) political party. That practice is not unknown to Macedonia either, with VMRO-DPMNE operating the official party weekly newspaper *Glas na VMRO-DPMNE (Voice of VMRO-DPMNE)*. In that situation, it should be expected for such newspapers to hold positive bias towards the political party that reflects or defends the same position. The party get the preferential treatment, editorials and commentary support its policies, and during election campaign, the paper will official endorse it and call its readers to vote for party’s candidates. That, however, doesn’t mean that such media can freely, to meet the purposes of party’s political propaganda, violate and disregard the basic standards of journalistic professional conduct or standards of media reporting.

The emergence of the Internet further complicates the situation. Now, all political parties run their official web-sites that are used, among other things, to report about a given party’s activities. In the case of leading Macedonian parties, their public relations offices are led by experienced journalists that have worked in traditional mainstream media. Therefore, it is safe to assume that the management of the web-sites is in the hands of persons with formal journalistic education or experience working as professional reporters or analysts. What should we do about those web-sites as communication channels? Aren’t those web-sites, to some extent, media themselves, in the sense that they publish editorially shaped and formulated information? Are those journalists – by past experience or by education – exempt from obligation to adhere to professional standards of journalism or not?

The situation is somewhat different in the area of broadcasting, that is, audiovisual media services. As an area that has traditionally been subject to regulation, both because some broadcast media use limited public resource and because of their potential influence and importance, majority of jurisdictions include obligations for the media regarding the possibility to support individual political movements and/or parties, or ideological and other profiling. The British legislation, for instance, imposes political neutrality on the broadcast media and prohibits political advertising in broadcast media during elections. In addition, majority of European jurisdictions prescribe obligations related to comprehensive, impartial and objective reporting, including strict penalties and sanctions for violations of those rules. The authority to decide in such cases is placed on the audiovisual regulatory bodies.

Regarding this recommendation from Priebe Report, we should bear to mind the traditional approaches and the differences that exist in the treatment of print and online media on one, and broadcasting on the other side.

*With print and online media, the actions and practices of editorial offices and their journalists have to remain self-regulated, and it is for every editorial office whether it will choose to profile itself along ideological or political lines, as long as it adheres to and applies the standards and best customs of journalistic profession, and as long as it is transparent and open in the declaration of that profile in an appropriate manner.*

*In broadcasting (audiovisual media services), the Law should be subject to thorough review and changed to introduce a clear obligation for objective and impartial, non-partisan reporting; to prohibit the publication of false or fake information; to introduce a set of programming standards and principles as requirements for radio and television broadcasting licenses; to prescribe administrative sanctions, including the annulment of broadcasting license; and to grant the adequate competences on the AVMS Council to be able to enforce the law.*

*We should eliminate all instruments available to the government to use to exert pressure in order to influence the reporting of the media. Here we think primarily of the possibility to control and direct, in one way or the other, public funds towards the media or other business ventures of media owners – either in the form of so-called “government advertising” or in the form of subsidized production of feature and documentary programming; or in the form of government contracts for media owners that would imply that the owner will have to throw in the deal a positive reporting favourable to the government by his or her media.*



# **PUBLIC BROADCASTING SERVICE AND ITS INDEPENDENCE AND IMPARTIALITY**

**T**he very wording of the recommendation indicates that MRT is not a true public service broadcaster, lacking any of the key features and characteristics of a public service broadcaster – impartiality and independence from political, commercial and other influence or ideology, and it doesn't contribute to informed citizenship.

For MRT to be able to make such as “Copernican turn” (Karel Jakubowicz) from party/government into a public service broadcaster, several diverse and parallel activities need to be undertaken, both in the social environment surrounding MRT and inside the public service broadcaster.<sup>10</sup> The following aspects are considered necessary and are international recognized criteria and standards that confirm the existence of a public service media.

Changes are necessary in the legislation, but also in practicing of transparency, accountability and responsibility of MRT in order to ensure constant, continuous and open communication between public service broadcaster's governing bodies and structure and the audience, that is, the citizens. Openness should not be set only as a formal aim. It should be supported by strong normative rules that prescribe clearly defined procedures and implementing entities and define, at the same time, the accountability of MRT's operations.

Openness and responsibility should not be reduced to formal accountability, that is, an obligation to regularly submit its reports formally prescribed by the legislation. The communication with citizens should not be only *post festum*, but to be equally intensive before

<sup>10</sup> For detailed analysis of situation at MRT and directions how to overcome them, see the public policy document: „Од МРТ до независна јавносервисна радиодифузија во Македонија“, available at [http://mdc.org.mk/wp-content/uploads/2015/11/03122014\\_Dokument-za-javna-politika\\_MRT.pdf](http://mdc.org.mk/wp-content/uploads/2015/11/03122014_Dokument-za-javna-politika_MRT.pdf) (in Macedonian only)

and during the process of adoption of decisions and documents that define the work of the public service broadcaster.

In the area of contents and programming, openness shouldn't be limited to some segments of MRT's operations, but should cover all areas of its work, thus providing for maximum and optimal transparency. It means it should cover a whole spectrum of topics, such as: Programming contents, financial operations, editorial standards, they should all be subject to public discussion and debate.

The open and responsible communication with the citizens should be restricted only to MRT's website, but should be adequately formatted in concrete programmes in MRT's programming schedule. At the same time, MRT should establish continuous, vibrant communication at an actual time and in actual space with the audience and formal and informal representatives of the citizens. Such meetings should follow annual dynamic, set in advance, and should be on the list of regular duties of the members of the Programming Council and senior editors of MRT's programming services.

The legally declared editorial and programming independence of MRT is largely fictitious. That fact has been reiterated constantly by domestic and foreign experts, but to no avail.

The real reason for its partisan reporting, for the inability to perform its programming obligations in an independent manner, the inability to practice the basic professional standards of journalism, lies in the absence of institutional autonomy, both from financial and from organizations and governing point of view. Only a true institutional autonomy can provide real grounds for editorial and programming independence of the public broadcasting service.

As noted above, there are two key elements that have to exist simultaneously to guarantee the existence of autonomous and independent public service.

On one hand, it is an issue of securing the financial independence of MRT. That independence will be real only if MRT's budget is: *Predictable over the mid-term; constant and sufficient to allow for unimpeded operation, including costs of development and technological upgrades; comes from several coordinated sources, some of which, like advertising revenue or budget grants, will be strictly controlled and limited; flex-*

*ible and dynamic in terms of internal redistribution of funds.*

The concept of MRT's budget must make clear distinction and differ between *commercial income* and *commercial service*, and redistribute its earnings in those two categories adequately, to finance its own needs or transfer them to available funds that stand at the disposal of the media industry.

The determination of the size of MRT budget, over the mid-term, should be entrusted on a newly created special expert commission, which will operate with full transparency and yet, its decision on the size of the budget shall be final and indisputable.

*On a parallel track, we need to revive the concept of broadcasting fee (license) which could be transformed into a public service media tax. The transformation should not change its fundamental quality: The fact that it is not the state, but the citizens who, through that tax/license, finance the independent work of the public broadcasting service, in accordance with their needs and interests.*

The second element of the institutional autonomy is the organisational and governing independence. In that sense, the internationally recognized and accepted standards indicate the work and operations of the Programming Council of MRT.<sup>11</sup>

The Programming Council, as the highest body in the organisational structure, should ensure that public broadcasting service's editorial policies shall be free of political, commercial and other influences and ideologies, and shall ensure the presence of diverse social interests, no the interests of the ruling parties, in its programmes.

*In order to be able to operated properly, the Programming Council should: Expand its composition to make it a larger body to be able to represent Macedonian society in all its diversity and all of the socially relevant groups; to abandon the existing concept of authorized nominators that serves as a smoke-screen for party, state and para-state institutions, i.e. the members of the Council should be nominated by professional associations or civil society organisations, trade unions, and other organizations. Also, we could consider the possibility to set additional requirements, like a qualified majority for election of members; or rules of incompatibility of Council membership with past performance of public or party offices.*

11 When discussing the institutional structure of governing and organizational independence, we should certainly take into consideration the positions of the Supervisory Board and the Director. However, having in mind the fact that they are both appointed by the Programming Council, we shall restrict our focus to the Programming Council only.

# PUBLIC BODIES AND INSTITUTIONS AND MEDIA

**T**he recommendation of the senior experts' group for the public bodies to not discourage or put obstacles to the media in the investigation or disclosure of possible defects in the functioning of state and society is key for the media to be able to truly perform their function of watchdog of government and centres of political and economic power.

In our practice, that is really a matter of putting equality sign between the ruling party and the state, of lack or complete absence of transparency and accountability, and of the authoritarian nature of a populist approach to politics where the ruling party constantly invokes the "people" and at the same time reserves for itself the exclusive right to define what is it that the "people" want.

The development of new technologies made it even easier for the ruling party, having in mind that, to the extent that it wants to be ac-

countable, views the media solely as a promotion tools for its real or alleged "successes", or as instrument to be used in the fight against its opponents. The new technologies, primarily the Internet, allow it to circumvent the traditional mainstream media and to talk to the public (understood as a collection of votes) directly, through "its own" information and news websites, social network profiles, or the party's website. That is quickly growing into a global issue, as evident with the new US President Trump, who prefers to communicate with the public through his Twitter account.

The manifestation of that approach is best seen in the treatment of requests for access to information and constant delaying tactics, arbitrary use of rules on classification of information, to prevent access to certain public information, the lack of response to the rulings of the Commission for Free Access to Information, etc. Another tactic is to invite the criti-



cal media and journalists to events or press-conferences organized by the government just minutes before their start, to ensure that only friendly media and journalists will be present, thus avoiding questions on sensitive topics or questions that were not pre-arranged.

*This recommendation is not, in general, related to the actions of media and journalists, but with implementation of a whole other set of necessary reforms that should lead to separation of party and state. Namely, reforms should ensure that the public administration shall serve the citizens, not the government, that is, the ruling party.*

*The reform will have to strengthen the requirements and obligations in the area of transparency and accountability of institutions, to secure*

*the instruments for true implementation of free access to information legislation and, if necessary, adequate sanctioning policies.*

*Finally, to eliminate that problem, we need to strengthen the personal and institutional integrity of public administration, and strengthen the awareness that accountability and transparency is not its discretionary right, but a legal obligation.*

*In addition, journalists should start using the opportunities offered by the Law on Free Access to Public Information, especially when the information they seek can't be secured through the spokespersons and public relations departments of the institutions, access they commonly use to save time, due to the insistence on speed of publication in the current 24-hour news cycle.*

# DEFAMATION

**D**efamation legislation everywhere possesses the potential to pressure the journalists and guarantee the holders of political and economic power that journalists will be less interested in more problematic aspects of their work.

In Macedonia, the potential defamation actions may prove to be a true threat for the journalists, due to the low sustainability of the impoverished media market. A lost defamation action case, if we combine the trial expenses with the maximum compensation for damages, may mean the end of the road for smaller, especially critical media.

Although the judges, in general, adhere to the Law and the case-law of European Court of Human Rights, the true problem with the defamation legislation and its implementation lies with the judiciary and its relationship with the executive power/the ruling party, a relationship dominated by the latter. That finding has been reiterated in several consecutive EC Progress Reports and reports by other foreign governmental and nongovernmental organisations that monitor the situation in Macedonia. We heard a confirmation for those findings about the so-called “Swarovski Judiciary” in the wire-tapped conversations released to the public.

That client-patron relationship contributes to a situation in which judges apply double standards when dealing with defamation action cases, that is, the high ranking government officials and officials of the ruling party get a pref-

erential treatment. Such cases of lawsuits filed against journalists by high-ranking government officials or politicians are rare, but they get huge attention in the press – Mijalkov v. Fokus or GEM v Minister of Finance Zoran Stavrevski. On the other hand, the Mayor of Bitola Talevski lost the case against “*Utrinski vesnik*” daily and its journalist Aneta Blaževska, and Ali Ahmeti, the leader of the second party in the ruling coalition DUI had his lawsuit against a journalist dismissed by the court.

*The Law on Civil Liability for Defamation is essentially a good law. The only interventions that should be considered is to introduce a mandatory mediation as part of pre-trial procedure, before the case makes it into the courtroom.*

*The second intervention would be to set a highest threshold of eligibility for lawsuits filed by public or government officials, following the example of U.S. legislation which requires a proof of “actual malice” by the person that made the disputed statement.*

*Third, the legal limit on the amount of compensation valid for journalists and media should cover all citizens, and the possibility to limit it altogether to a symbolic amount should be taken into account.*

*The matter of the judiciary and its treatment of defamation action cases is, in fact, subject to a whole set of other reforms covered by the Priebe Report, that is, the recommendations on the judiciary and the efforts to free it from political influences.*

# END TO THE PRACTICE TO “BUY” POLITICAL SUPPORT OF THE MEDIA

**A**s already noted, the government, that is, the ruling party, used the situation in the unsustainable market and its indisputably powerful position in national economy that largely relies on budget and public spending and investments to dictate the trends on the advertising market. Through placement of its promotional budgets for “public interest” campaigns, through its influence on the spending of advertising budgets of even privately owned companies, and through the control of public procurement procedures and decisions who will win the lucrative government contracts, the government “stimulated” the friendly media and their owners.

One should make difference between the advertising time various governments in the world buy in foreign and international media, to advertise the countries as tourist or investment destinations. A completely different category is the ability to buy advertising space and time in domestic media, because that practice could be used to influence editorial policies.

In majority of countries that is a strictly regulated activities, with clear definitions of the areas of public interest for which public information campaigns can be produced, as well as strict rules on their placement in the media. Although that activity is subject to deregulation, even in those countries where public institutions and public enterprises are allowed to engage in media buying, it usually represents a

small fraction of the total advertising market.

Another problem is that in Macedonia, the government's public information campaign budgets account for a huge share of the total advertising market. Depending on the estimate of the total available advertising revenue, the government spending on marketing activities amounts to between a quarter and a fifth of the market. In fact, for a number of years, the government was among the leading, or the leading buyer of advertising space and time in the market.

On the other hand, although a moratorium on government advertising has been in force for more than a year and a half, there are serious indications that the ruling party continues to use other channels to pump public money into the media. One significant source of such funds are the budgets of local administrations, not covered by the moratorium, and municipal administrations continue to engage in media buying and financing of the media, under the cover that they invest in information about their activities.

The whole time, the implicit message to the critical media was that, if they want “fair and equal” access to those budgets, they need to consider the possibility to change their editorial policies.

*MDC has already published a detailed policy brief on the spending of public information campaign promotion budgets (<http://mdc.org.mk/javni-politiki-kampanji-za-javno-informiranje-na>*

*vladata-i-drzavnite-institucii). Here, we intend to repeat some of its main conclusions, the main of which is that the possibility for the government and government institutions to appear as media buyers should be eliminated completely.*

*At the same time, we need to consider the possibility for detailed regulation of two areas.*

*The first covers the public enterprises and the manner and rules for them to engage in media buying.*

*The second area are the public information campaigns (public interest campaigns), and the need for detailed regulation of topics and areas for which public information campaigns can be produced, the financing of production, and the*

*placement of produced contents in the media (videos, jingles, etc.).*

*The implementation of this recommendation will also depend on the reform of the functioning of government in Macedonia, its transparency and accountability in spending of public budgets. It should include a legal obligation to report regularly its expenditures on production and dissipation of public information campaigns (even if the government is prohibited from engaging in media buying) and make them publicly accessible, in line with principles of “open data” and “open government”, on an adequate online platform, and on request in accordance with FOI legislation.*

# MEDIA OWNERSHIP AND FINANCING TRANSPARENCY

**M**edia transparency, their activities, ownership structure and sources of financing are of huge importance. First, because the media control power and play the role of watchdogs of democracy, paying attention that government institutions are transparent, they should pay attention about their own transparency too, to avoid accusations of hypocrisy. Second, transparency of ownership structure and sources of financing should allow the citizens to identify possible political, ideological or business ties to other entities, and the possible influence of major advertisers or sponsors on their reporting.

Macedonian legislation prescribes formal obligation to publish the ownership structure, the name or the names of person/s or company/ies that publish the given media outlet, on broadcasting and print media. The audiovisual regulatory authority keeps registries of broadcast and print media. The online media were left out of the regulatory framework completely.

For broadcasters, the Law on Audio and Audiovisual Media Services sets the ownership criteria, complete with provisions on prevention of media concentration and a list of persons or entities that can't own media or shares of ownership in media, because of possible conflicts of interests of businesses, political parties, state institutions, elected and appointed public officials or members of their immediate families. Those provisions are adhered to, although sometimes the implementation is merely formal and legal obligations are easy to circumvent. The former ruling party, for instance, controls a number of regional terrestrial broadcasters owned by its members that don't hold high party or state offices. Also, in several of the most influential media, there are cases of real owners hiding behind proxies. We have had several formal changes of ownership, with media owners that were elected, or their family members were elected, to high public offices. In most cases, in spite of such formal changes of ownership, the public generally knows well

and is aware who stands behind a given media outlet and can make a relatively informed conclusion about possible political and economic interests represented by the media.

There is a problem, however, with the transparency of a large number of internet portals and news sites. Several major pro-government portals, for example, are owned by companies registered in known tax havens like Belize. Their impressums, when available, don't list any information on the publisher. On the other hand, it is a fact that online media were left out the regulation framework and, in that regard, have no formal obligations other than obligations prescribed by the legislation on commercial companies or legislation on civic associations and foundations, for those portals that are registered as CSOs.

Closely related to the issue of transparency of ownership structure is the issue of transparency of financing of media. It results from the fact that the most influential media, especially the national TV networks that broadcast over the digital terrestrial multiplex, but also the majority of newspapers, are owned or have close ties with larger corporations with diverse business portfolios. Their owners usually use their media as support for their other business ventures. Due to the fact that public spending and investments account for a significant portion of national economy, they often make sure to avoid any possibility to get cross with the government, to secure access to the lucrative government contracts.

In the limited and unsustainable media market in Macedonia, the additional sources of finances – internal subsidies provided by the owners, sponsorships and, we fear, public funds that the government places in the media through public works contracts or other more or less hidden channels, create huge opportunities to influence the media and their editorial policies.

The media ownership is in the centre of that situation and media owners, to keep their media above the water, put the pressure on their editorial offices and newsrooms. As a result, the internal independence of the editorial offices is lost and they are forced into greater or lesser self-censorship or open support of the government.

The second reason to keep close ties with the government is the access to its advertising budgets, that is, budgets for promotion of various public information campaigns. Prior to the introduction of the moratorium on government advertising, they amounted to a significant portion of the total available advertising revenue.

*Regarding transparency of ownership of electronic publications (online media), MDC finds it acceptable, in accordance with the recommendations of the Council of Europe, for them to be given the same treatment as print media, that is, to be obligated to publish the name of the publisher in the impressum page.*

*When implementing this recommendation, we should consider the possibility to introduce an obligation for the broadcasters, in their annual reports to the regulatory agency, to present a detailed overview of advertising income, that is, the names of their biggest advertisers and, especially, how much of their ad time sales income comes from various public budgets (Government, local administrations, public enterprises, etc.).*

*The existing provisions for prevention of media concentration in broadcasting that define the limits on shares of ownership that individual broadcasters can own in different media, prevent the contemporary trends of lateral expansion into other, usually specialized format programming services, or sub-channels.*

*In view of the necessary and seemingly unavoidable market consolidation, we need to consider the possibility to use regulatory policies and legislative solutions to stimulate and allow for that line of development of media companies.*

*Also, we should probably move from limiting media ownership measured by the number of broadcasters one person or entity owns to measuring pluralism in the media market through limitation of their share of advertising market and audience share of a broadcasting company with all programming services it offers. That system functions in Germany, and any media exceeding the prescribed audience share results faces a series of actions by the regulatory authority, to rectify the situation.*

*When discussing the possibilities for resolution of issues related to media financing, and the need for consolidation of the market that should lead to financial and economic strengthening of media companies, the audiovisual regulatory body should be given greater competences in adoption and implementation of policies that could contribute to that goal, through stricter regulation and criteria for entry in the free-to-air TV market and its monitoring.*

*Finally, the activities aimed to ensure the transparency of ownership and flow of money in the media industry need a complementary approach, with full involvement of competent state bodies and institutions – the Commission for Protection of Competition, Anti-Corruption Commission, the Public Revenue Office, Agency for Prevention of Money-Laundering, etc.*

# WORKING CONDITIONS AND SELF-CENSORSHIP

**T**he journalistic profession is engulfed by a deep crisis on a global level, and the crisis has reached such a state that several surveys of U.S. labour market rank it as the worst job and occupation (a position it shares with lumberjacks), and is regularly placed on the list of most endangered occupations on the labour market. The trend of loss of journalistic jobs in the U.S. is constant, with an average decline close to 10% annually<sup>12</sup>. From the maximum of about 56,000 journalists employed in print media newsrooms (the figure doesn't cover technical and other personnel) in 1990, or about 55,000 in 2006, the year of start of the dramatic decline, the figure has dropped to 32,900 at the end of 2014, with the trend continuing into 2015. Although a number of those journalists moved to the new digital platforms, they are not sufficient to buffer the blow.

Macedonian journalists feel the same economic pressure as the majority of their colleagues around the world. The journalists couldn't stay separated from the situation in the national economy and the labour market, which is characterised by high unemployment and low wages. For instance, with an average salary of about 300 Euro paid to journalists in TV newsrooms – their colleagues that work for online media take much less – journalist's salaries remain under the national average. In return, they are expected to work without paid overtime, on part-time or temporary contracts, or if they were lucky enough to be employed full time, their social allowances are not paid on their full salary, etc.

That precarious situation of uncertain and unstable employment, with high risk of losing one's job, is used by the government, through its allies in the ranks of media owners and se-

12 The Poynter Institute keeps and regularly publishes statistics on this issue, <http://www.poynter.org>



nior editorial staff, to impose a regime in which self-censorship has turned into a tool of survival. Few journalists can afford to refuse to complete a task that asks them to overlook or misrepresent and spin the facts in favour of some person or entity, to sign a text written by somebody else, etc.

At the same time, the government and the owners of the most influential media accept the journalistic trade union SSNM as equal social partner only formally, actively work against creation of union organizations in their newsrooms, and the ruling party has started the work to create a parallel union of its own, one that, we assume, will treat the labour rights of its members differently.

Although the Law on Media, in Article 11, guarantees the right of journalists to hold opinion and position, and the right to refuse an order or task contrary to the professional principles of journalistic conduct, the Law doesn't prescribe any sanction or any instruction where journalists who have had their rights violated could seek protection and remedy. It does mention the Law on Employment Relations, but only as a warning that provisions of Article 11 don't relieve journalists from responsibility under the provisions of the Law on Employment Relations. The journalists have the option to accept the situation and keep silent, or to leave the media outlet, inform the public and hope they could find position in another editorial office.

As a result of the combined influences noted above, a growing number of journalists choose to leave the profession altogether. All the while,

the interest of the young people to choose a career in journalism is declining, as evident in the numbers of new students enrolled in some of the journalism schools in Macedonia.

We have several approaches available in the efforts to improve the working conditions in Macedonian media.

*We could wait for the economy to recover and grow to ensure better salaries. The question is, can we wait for so long? We could wait for the market, overcrowded and politically divided as it is, to start the process of consolidation, the outcome of which would be that only the media that the market can support economically would remain.*

*The assumption is that the media would then earn sufficient income from sales of advertising to be much less dependent on other sources of financing, allowing them greater independence and autonomy in the implementation of their editorial policies. On the other hand, the price we have to pay in lost journalistic positions will be enormous.*

*What should certainly be taken into consideration is the need to ensure proper legal protection, complete with sanctions for employers, from violations of provisions of Article 11 of the Law on Media.*

*We also need to work to overcome the existing divisions in the journalistic community and to unite all journalists into one trade union, which would certainly have greater power of negotiation with employers and social partners to ensure better working conditions and greater freedom for journalists to perform their socially responsible job.*



# AUDIOVISUAL REGULATORY BODY

**T**he Priebe Report and its recommendations related to the media sector, doesn't mention explicitly the audiovisual regulatory body, the Agency for Audio and Audiovisual Media Services. On the other hand, the regulatory body, its role and task to respond to the need to regulate the audiovisual media industry in an impartial and non-partisan manner, with the purpose to protect and promote media freedoms and establish an institutional barrier to protect the media from the appetites and pressures of the government, were recognized by the local stakeholders, and we have already seen several concrete proposals aimed to ensure its institutional strengthening and improved operations.

The Report's analysis of the situation in the media clearly indicates that the Agency is neither "independent" nor "autonomous" regulatory body, and is certainly not an institution that fully meets its legal obligations and pro-

motes the "development of audio and audiovisual media services" and "promotion of freedom of expression". In fact, the Agency is the exact opposite of its intended purpose, instead of "institutional barrier", it is the "institutional crown" of the pressure that government applies on the (disobedient) media. Instead of taking its primary role, to adopt policies and practices that would have as effect a sustainable, open, democratic audiovisual market and sector, the Agency dedicates and directs its otherwise substantial capacities towards other competences, such as the "promotion of media literacy".

Without getting into concrete details and specific legal provisions, we believe that the existing legislation needs a thorough review and reconsideration of the very concept of the regulatory body. We need to ensure that legal and practical conditions need to be created for Macedonia and its audiovisual media sector to

get a truly independent regulatory body that will adopt and implement policies that would allow it to perform its main tasks listed above.

*First, the legal intervention is necessary in the manner of selection of member of its steering body, the Council of the Agency, to eliminate all possibilities for political influence over its composition, and the process of selection should focus and prioritize the professional, expert and personal integrity of its members, as a guarantee that the Agency will adopt correct and indisputable decisions on matters within its competence. We believe that it should mean the elimination of the existing system of authorized nominators, a system that serves as a smokescreen for the government to ensure it will have majority in the Council, as proved by recent practice. The procedure for selection of Council members should be conducted through a public call, based on criteria of professional qualifications in the areas of media*

*and communication policies, and criteria focused on political impartiality and non-membership in political parties, as an additional guarantee.*

*There are two more characteristics that need to be implemented in the normative identity of the regulatory body. The first is that the Council should be transformed into the Council of the Agency, and not the Council of the Director of the Agency, a conclusion resulting from the current distribution of competences between the two. Therefore, we should abandon the concept of the Agency being personified in the position of its Director, and put the accent on the Agency as a collective body. The second change refers to the expansion of Agency's competences, as a requirement of its independence and efficiency, with the Council being granted full competence over adoption of all documents, strategies and policies, including the policies regarding allocation of broadcast licenses and sanctioning policies.*

# CONCLUSIONS

**T**he Priebe Report is a document focused on very specific tasks that cover much wider area than an analysis focused on the media sector. Its primary goal was to respond to the challenge of the comprehensive political crisis that has prevailed in Macedonia at least since the events of “Black Monday”, December 24, 2012, and culminated in the release of the illegal surveillance of communications of literally thousands of citizens. The Report refers to all aspects of governance and rule of law in the country and offers solutions or directions for actions that could prevent repeat of the serious abuses of power and institutions by a single party that aims to establish an almost totalitarian or total control over the society.

The general intention of the recommendations is also to secure for all participants in political processes and elections an equal treatment and status, equal access to the media in

presentation of their programmes and policies to the public, that is, to the informed citizens/voters.

In the period from the first Przino Agreement (June/July 2015), and in particular before and after the early Parliamentary Elections of December 2016, the Macedonian public, or at least the critical and opposition segment of the public, developed an almost general consensus that the recommendations presented by the group of senior experts led by Reinhard Priebe were the only road to restoration of democracy and rule of law in the country.

The situation is quite similar regarding the recommendations that cover the media reforms. The leading parliamentary parties and coalition (in the previous Parliament) accepted, with the Przino 2 Agreement, to implement urgent reforms in the media sector, immediately after the new government takes office, aimed to implement the recommendations of the

Priebe Report. On the other hand, we believe that those recommendations provide a fine starting point but they don't in any way or fashion exhaust all the needs and opportunities for intervention, especially in the media legislation, that would lead towards real progress and truly free, pluralist and sustainable media system.

The recommendations of the Priebe Report also serve as foundation for the initiative of a group of civil society organisations in the preparation of the "Blueprint of Urgent Democratic Reforms", which provided further elaboration and extended the list of areas that need changes.

Therefore, the implementation of the recommendations and the preparation of solutions to translate them into legal texts, the list of eight recommendations on the media should not be considered exhaustive and closed, but we should consider all possibilities and opportunities that would allow the media system in the country to be reset and to move towards truly free media sector.

Second, disregarding the statements given by political figures during the election campaign, the whole process of reform of media sector, both in terms of legislative interven-

tion or matters that are customarily resolved through self-regulatory instruments, has to be open, inclusive and conducted through a process of proper public debate and discussion. The importance of media in the development of democratic society demands, on matters referring to freedom of media, to hear the voice and opinions of all actors and stakeholders in the society. In fact, some of the problem existing in the current legislation result from the utterly opaque, closed process of its adoption, including the largely feigned process of public debate on the proposed drafts.

Finally, we should pay due attention to the segment of reforms that won't be possible to resolve through legislative interventions. The media community – media owners, journalists, media professionals – should invest maximum effort to create proper trade and professional associations, as foundation of an adequate and effective self-regulation system, not only for the professional standards of journalism or media reporting, but also in other areas of media operations, such as behaviour and actions in the market, advertising, protection of competition, etc.

**MEDIA SECTOR REFORM**  
**PRIEBE'S RECOMMENDATIONS**  
**AND OTHER ISSUES**



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