



THE DIGITAL DISRUPTION AND THE NEWS MEDIA MARKET: FUNDAMENTALS FROM THE WESTERN BALKANS

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2024

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Co-funded by
the European Union



Ministry of Foreign Affairs
of the Czech Republic



The project was supported by the Ministry of Foreign Affairs of the Czech Republic
under the Czech Republic Transformation Cooperation Programme.



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Introduction

The relevance of public discussions, progressive regulations and the development of skills to act and exist amid a digitally transitioning news media sector cannot be overstated. From the legislative and practical viewpoint of content manufacturing on one side, and access to reliable information on the other, challenges brought by the digital disruption in the news media sector are a burning issue for all stakeholders. This handbook provides an insight into the state-of-play in Western Balkans in relation to (in)compatibility with the EU values and media standards in an emerging, but still largely unregulated, news market. The publication has an enhanced focus on Bosnia and Herzegovina and Serbia as part of the project ***Preparing news media in Bosnia and Herzegovina and Serbia for the digital age***, supported by the Transition Promotion Programme of the Czech Ministry of Foreign Affairs.

The EU dimension

In a rapidly altering news media environment, television still stands as the main source of news for 75% of EU citizens, especially among seniors. Additionally, 43% of news consumers use online platforms, 39% the radio, while already 26% follow news content via social media and blogs. The printed press has the least – and constantly decreasing – impact, reaching only 21% of the news consumer audience regularly.¹ If we contrast this to the fact that 88% of the surveyed access news through smartphones or computers, projections suggest daily newspapers will almost completely disappear globally by 2030, while linear broadcasting of television and radio content diminishing similarly as well.

¹ <https://europa.eu/eurobarometer/surveys/detail/2693>

Relying on the competition of the information market without any or little regulation in such a news media ecosystem, exposes journalists and media outlets to unprecedented challenges. It also leaves the audience without any guaranties in accessing reliable news. EU regulations should therefore safeguard the working environment, provide access to trustworthy information, contain fake news and hate speech, protect journalists, media personnel and press outlets, but also regulate content sharing platforms and social media.

Tackling these tectonic changes on a higher level, digital (news) media initiatives tie into the **Europe's Media in the Digital Decade: An Action Plan to Support Recovery and Transformation**.² As a comprehensive policy programme of the 2020s it introduced relevant policy and legislative measures, such as the **Digital Services Act (DSA)**, the **Digital Markets Act (DMA)**, the **Artificial Intelligence Act (AI Act)**, and - probably the most relevant in terms of interpreting and consuming news - the **European Media Freedom Act (EMFA)**. Working simultaneously, with the EU's **Audiovisual Media Services Directive (AVMSD)**, which governs the EU-wide coordination of national legislation on all audiovisual media - traditional TV broadcasts and on-demand services - these steps comprise the milestones of digital media regulation for member states. Comparatively, they also constitute the horizon of alignment for all EU candidate countries.

In principle, the latest revision of the **AVMSD** remains applicable to those services, which act and exist to inform, entertain or educate. Addressing the digital disruption in relation to news content, the **AVMSD** lays down that national regulatory bodies within the EU must safeguard amongst other media pluralism, act in accordance with the internal market, and promote fair competition. They must be independent from the government and their responsibilities must be defined by law. They should have the enforcement powers and resources

² <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52020DC0784&from=EN>

necessary for the fulfilment of their tasks, in terms of staffing, expertise and financial means. Lastly, the selection, replacement and work of officials heading these regulatory agencies must be transparent also.³

The **DSA** and **DMA** aim to create a safer digital space where the fundamental rights of users are protected and to establish a level playing field for businesses. In terms of digital news media this mostly relates to social networks and content-sharing platforms. Aimed at containing disinformation, hate-speech, targeted (political) advertising for users, but also to allow the free flow of ideas and commentary, the goal of the **DSA** and **DMA** is to protect both news audiences and journalists equally. They ensure giving people more control over what they see online. As an increasing number of news consumers follows news on social media, where political advertising, fake-news and ambiguously sourced videos are often “sandwiched” between curated interpretations of current events these Acts should ensure safer, fairer and more transparent platforms of news distribution and consumption. Connected to this is an enforcement framework, with a full set of investigative and sanctioning measures that can be taken by national authorities and the Commission.⁴

Tying into this closely is the **AI Act**. Focusing on regulating the uses of AI rather than the technology, the Act represents the European response to similar regulations in the US, UK or China. Addressing the transparency in the creation of synthetic news content, the Act connects to newsrooms in terms of “limited risk” AI systems. In this sense, it should highlight machine written text and contain AI-propelled disinformation and deep-fakes in terms of images, audio and video.

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L1808>

⁴ <https://digital-strategy.ec.europa.eu/en/policies/dsa-enforcement>

Lastly, the most immediate intervention is the **EMFA**, the first common framework for media services in the internal market. As an EU-wide comprehensive regulation, it deals amongst others with the protection of editorial independence and independence of public service media, use of spyware against media, transparent state advertising and protection of media content online. It also proposes to set up a new independent European Board for Media Services, comprised of national media authorities, which will monitor media freedoms on the member state level. Seeking to stop political interference in editorial decisions, media capture and to ensure transparency and stable funding for public service media, the EMFA should also ensure the accessibility of online content on various platforms.

It is important to note that all these initiatives occurred in the past few years. In this sense, up until recently, EU media outlets, which inform almost a half of a billion citizens, did not correspond to an overarching media policy.⁵ In terms of the EU neighbourhood this translated into a lack of a unitary model they could aspire to, with only vague indications in the Chapter 10 of the EU acquis.

The WB6 Dimension

The shift to digital consumption threatens traditional media. Television is still the main source of news for citizens in the Western Balkans (WB6). They are following EU trends,⁶ but the use of the internet and social media is rapidly growing.⁷ In Serbia, a 2022 study found that while social media surpassed TV news

⁵ Brankica Petković and Sandra Bašić-Hrvatini: *EU enlargement policy and the media: a political or a technical issue?*. In: Pier Luigi Parcu – Elda Brogi (ed.): *Research Handbook on EU Media Law and Policy*. Edward Elgar Publishing. 2021. 397–406.

⁶ <https://europa.eu/eurobarometer/surveys/detail/2693>

⁷ <https://www.iri.org/wp-content/uploads/2022/06/BALKANS-22-RS-01-Full-deck-1.pdf>

programs in usage, television was still the preferred primary source, while younger citizens relied on social media as their main news source⁸—a trend also seen in Bosnia and Herzegovina.⁹ While Kosovo has already remained without a daily print newspaper, the rest of the WB6 countries will probably follow this pattern and suspend daily print probably by the mid-2030s. The digital transition has also affected traditional media as advertising revenue has shifted to digital platforms,¹⁰ resulting in news desertification and increased state subsidies, while major companies like Google dominate ad revenue.¹¹

Traditional media struggles to modernize their operations. Print media has seen drastic declines in circulation, with only a few outlets transforming into digital-first operations. Some examples that successfully transitioned to a hybrid print-digital model are *Blic* and *Danas* in Serbia and *Oslobođenje* in BiH. However, they have done so with relative success when it comes to maintaining journalistic professional standards. Public broadcasters like RTS in Serbia, or MRT in North Macedonia are struggling to modernize their operations.¹² Successful transitions require investment in data-driven content, diversified revenue streams (e.g. crowdfunding), and targeting specific niches – which few media outlets can afford. Success stories in donation campaigns supporting free press were recorded in Serbia,¹³ while some media introduced on-demand content and new formats (e.g. podcasts).

⁸ <https://www.osce.org/files/f/documents/5/6/549442.pdf>

⁹ https://www.media.ba/sites/default/files/stetni_narativi_-_web_pages.pdf

¹⁰ https://www.masee.org/images/pdf/MASEMedijiUCrnoj_GoriAnalizaMedijskeIndustrije.pdf

¹¹ https://www.masee.org/images/pdf/MASEMedijiUCrnoj_GoriAnalizaMedijskeIndustrije.pdf

¹² https://neighbourhood-enlargement.ec.europa.eu/document/download/5f0c9185-ce46-46fc-bf44-82318ab47e88_en?filename=North%20Macedonia%20Report%202024.pdf

¹³ <https://rm.coe.int/msi-res-2022-08-good-practices-for-sustainable-media-financing-for-sub/1680adf466>

Lack of regulations on digital media enables political manipulation. Due to a lack of legal prerequisites, a proliferation of web portals with no declared ownership or funding structure has occurred over the past years. The absence of robust frameworks for regulating online platforms allows the spread of disinformation, often amplified by politically motivated actors. Ownership structures are opaque, with politically affiliated actors using media outlets as tools for propaganda, while state advertising is disproportionately allocated to pro-government outlets, distorting the market and hindering an independent digital transformation.¹⁴ While in Bosnia and Herzegovina anonymous portals appear as the dominant mechanism of malign influence, bots on social media take primacy in much of the region.¹⁵ In Serbia, large amounts of accounts and groups act in “coordinated inauthentic behavior” to support President Aleksandar Vučić and to criticize political opposition. Alleged government employee activities were recorded on the meta-social networks,¹⁶ X (Twitter),¹⁷ and others.

Media literacy levels are substandard, and a low priority for WB6 governments. The Western Balkans are among ten countries that have scored the least on the 2023 European Media Literacy Index, with Serbia and Montenegro belonging to the penultimate and the rest to the last cluster.¹⁸ Despite of this, there is no systemic approach to advancing media literacy in the region, leaving audiences vulnerable to manipulation. Bosnia and Herzegovina currently does not

¹⁴ <https://birnsrbija.rs/transparentnost-pod-lupom-javne-nabavke-za-medijske-usluge/>

¹⁵ <https://www.balcanicaucaso.org/eng/Areas/Bosnia-Herzegovina/Disinformation-and-anonymous-portals-in-Bosnia-204485>

¹⁶ <https://about.fb.com/wp-content/uploads/2023/02/Meta-Quarterly-Adversarial-Threat-Report-Q4-2022.pdf>

¹⁷ https://fsi-live.s3.us-west-1.amazonaws.com/s3fs-public/serbia_march_twitter.pdf

¹⁸ <https://osis.bg/wp-content/uploads/2023/06/MLI-report-in-English-22.06.pdf>

have a strategy devoted to media literacy and the safe use of new media.¹⁹ While the Serbian Media Strategy for 2020-2025 emphasizes digital transformation and EU alignment, it struggles with the practical execution, particularly regarding social media oversight. For years, civil society organizations make efforts to advance media literacy in the region,²⁰ in programs supported by the EU or other international donors. Unfortunately, this trend is likely to continue and stay in the CSO sector, as national governments often treat media literacy as low-priority, leaving audiences vulnerable to disinformation.

Alignment with EU digital policies is lacking, made complex by inadequate responses to challenges. Recent EU initiatives focusing on media and relating to it both economically, but also as a public good, are promising developments. Comprehensive policy programs include: the Digital Services Act (DSA), the Digital Markets Act (DMA), the Artificial Intelligence Act (AI Act), and the European Media Freedom Act (EMFA). Together and working in coordination with the EU's Audiovisual Media Services Directive, it constitutes the horizon of alignment for neighbourhood countries. However, prior to amounting to an overarching media policy, the WB6 did not have an aspirational unitary model. Aligning with vague indications of Chapter 10 of the EU acquis has resulted in individual laws on digital challenges, establishing some rules regarding digital services and markets on national levels. Due to the past laws' inadequate responses to current challenges these frameworks lag behind, while the diversification across the domestic

¹⁹ <https://megafon.ba/medijska-i-informacijska-pismenost-zbog-cega-je-potreban-drugaciji-pristup/>

²⁰ https://www.media.ba/sites/default/files/media_and_information_literacy_in_the_western_balkans_unrealized_emancipatory_potential_final.pdf

frameworks prevents a systemic regulatory approach in instances in well-covered areas.²¹

Disinformation flourishes online across the Western Balkans, while there is no regional enforcement to limit the impact. Even if the local legislation aligns with the DSA, as a precedent tackling fake news and ensuring safer and more transparent online spaces, major platforms like Facebook and X (Twitter) are not obligated to implement the prescribed measures. While platforms occasionally remove false content, the absence of robust regional enforcement mechanisms significantly limits the impact – as the WB6 does not fall under the EU market's jurisdiction. In turn, platforms have introduced fact-checking programs in collaboration with local organizations, but these efforts are limited and often exclude smaller Western Balkan countries. Meanwhile, the spread of disinformation is cited as a key factor hindering the EU accession for Serbia, Albania, and North Macedonia.²² Sputnik News and Russia Today are notable sources, available in Serbia in both Latin and Cyrillic script,²³ thus reaching audiences in Bosnia and Herzegovina, Kosovo, Croatia, Montenegro, North Macedonia, and even Bulgaria. Not to mention the diaspora communities from the WB6 in the EU and globally. The unregulated Serbian online media landscape poses a risk, as digitalization has significantly facilitated dissemination and enabled regional players to gain visibility and exert influence beyond their home markets.

²¹ https://www.sharefoundation.info/wp-content/uploads/SHARE_DSA-DMA-AIA-STUDY.pdf

²² <https://scidevcenter.org/wp-content/uploads/2024/10/COUNTERING-DISINFORMATION-ABOUT-EU-INTEGRATION-IN-THE-MEDIA.pdf>

²³ <https://www.osce.org/files/f/documents/5/6/549442.pdf>

Ownership of telecommunication infrastructure has played a progressively political role, with the rise of national and cross-regional monopolies.

Telekom Srbija holds a market share of 54.2% in media content distribution, while SBB (owned by the United Group) holds a share of 38.5%. The remaining part is held by operators with individual shares of less than four percent.²⁴ Among the top 10 TV groups active in Europe, three of them are under the Serbia United Group (private entity) with a total of 119 channels across Europe. Telekom Srbija (owned as a public enterprise by the Government of Serbia) with 67 channels across the WB6 region and the Pink Media Group (private entity) with channels across the WB6 region.²⁵ As a notorious example across the region in terms of monopoly and concentration of state funding, Telekom Srbija has acquired all cable operators in the Serbian enclaves south of the river Ibar in Kosovo,²⁶ majority shares in Telekom Srpska (Bosnia and Herzegovina) and mtel (Montenegro). It amounts to a cross-regional monopoly, as the amount of content it can disseminate can pose a hazard to democratic dialogue not only in Serbia, but also in the entire WB6 region.

The use of AI, as a growing concern, is almost completely unregulated. In the WB6, domestic legal frameworks do not align with norms to ensure oversight, transparency, harm prevention, or address adverse effects of AI. A 2024 study has found that laws do “not cover” these areas in Bosnia and Herzegovina, Kosovo, and Montenegro at rates between 95%-100%. Serbia stands out as the most advanced among the WB6, having covered 32% and partially covered 26% of

²⁴https://www.ratel.rs/uploads/documents/empire_plugin/Pregled%20trzista%20Q3%202024.pdf

²⁵ <https://rm.coe.int/audiovisual-media-services-in-europe-2024-edition-a-schneeberger/1680b0dc9a>

²⁶ <https://n1info.rs/vesti/telekom-preuzeo-sve-kablovske-operatere-u-srpskim-enklavama-juzno-od-ibra/>

AI-related rules in domestic law.²⁷ In May 2024, a working group for the Artificial Intelligence Law was formed, but the draft law is still not available to the public. However, controversies with the use of manipulated footage and deepfakes have already entered newsrooms, with alleged symmetric responses to such content targeting government officials, as opposed to citizens and the opposition.²⁸ The alleged video of the owner of Pink Media Group shared on the platform X highlights the urgent need to regulate the misuse of artificial intelligence in producing deepfake content, as well as the importance of using AI tools to effectively combat disinformation. The use of deepfakes has been on the rise across the region, with a noted surge in Kosovo in 2023, targeting individuals to harm reputations and sow divisions.²⁹ Currently, there are no penalties or other sanctions in the context of AI system development and use, and cooperation with platforms is the most immediate pathway.

Although the overwhelming majority of journalists acquired a digital skill set in the past decades, the advent of artificial intelligence in the newsroom introduces a new level of news media literacy. The preparedness of journalists to recognize, but also to harness the new technologies is crucial. Media organizations have begun experimenting with AI tools mostly for translation, and transcription and less for content production, fact-checking, and public engagement. Regarding the responsibility of journalists in Serbia, the new Draft of the Code of Journalistic Ethics, it is proposed to introduce a specific guideline stating that media outlets may use artificial intelligence to create content in a socially responsible and proportionate manner, but they are obligated to inform the public that the

²⁷ https://www.sharefoundation.info/wp-content/uploads/SHARE_DSA-DMA-AIA-STUDY.pdf

²⁸ <https://balkaninsight.com/2024/07/04/serbia-reacts-fast-over-ai-deepfake-video-of-pm-unlike-other-cases/>

²⁹ <https://birn.eu.com/wp-content/uploads/2023/12/01-BIRN-Digital-Rights-Violations-Annual-Report-2022-2023.pdf>

media content was created using AI-based tools. It is also emphasized that such content is subject to editorial responsibility, without exempting journalists and editors from the obligation to adhere to the Code.³⁰

The growing use of online media has adversely impacted the safety of journalists. The online sphere is changing the anatomy of attacks, pressures, and threats made against journalists. Constant access to journalists and the increase of threats are increasingly correlated.³¹ NUNS recorded 74 attacks and threats against journalists and media in the regional database SafeJournalists.net in 2024, with 48 incidents online, including two DDoS (distributed denial of service) attacks on websites, while the rest were death threats and other threats directed at journalists through email correspondence, direct messages via communication apps, comments, and social media. Digital threats are particularly harmful as it is difficult to identify culprits. In Serbia, formal reporting of these crimes to authorities raises concerns of impunity, as journalists state that reports “get stuck in the prosecutor's office.”³² Another concern is that in this environment, as recorded in Albania, journalists practice self-censorship to avoid online smear campaigns and harassment.³³

³⁰ <https://nuns.rs/poziv-na-javnu-raspravu-izmene-kodeksa-novinara-srbije/>

³¹ <https://detektor.ba/2023/11/02/nekaznjivost-napada-na-novinare-prijetnja-za-slobodu-govora-i-demokratsko-drustvo-u-bih/>

³² <https://birnsrbija.rs/wp-content/uploads/2023/07/Bezbednost-novinara-u-digitalnom-okruzenju.pdf>

³³ <https://birn.eu.com/wp-content/uploads/2023/12/01-BIRN-Digital-Rights-Violations-Annual-Report-2022-2023.pdf>

Recommendations

1. Promote data-driven journalism by encouraging newsrooms in adopting data analysis tools, while training journalists in data-driven storytelling. By incorporating analytics and visualizations, media can develop in offering in-depth reporting, thus attracting a younger, yet unaddressed audience. A close collaboration with tech companies and NGOs can accelerate this shift.

2. With the increasing smartphone penetration, a prioritisation of mobile-optimized content and mobile-first strategies should be a priority across the WB6. **Develop responsive websites**, mobile apps, and content tailored for social media platforms to engage readers effectively with content suitable for the 2030s.

3. Increase accessibility and personalization with the introduction of AI-driven algorithms for content recommendation and accessibility features, such as text-to-speech and multilingual support. Consider a similarly personalised synthetic content for radio. This can cater to a broader audience, provide more granularity in the user experience, and including people with disabilities and non-native speakers from the WB6.

4. Strengthen cybersecurity and trust in digital platforms by state funded, broad and comprehensive media literacy programmes. Address misinformation and ensure secure news delivery by implementing robust cybersecurity measures and verification mechanisms. Invest in pre-bunking and fact-checking to build trust among readers.

5. Encourage local journalism. Develop digital platforms to support local and hyperlocal journalism to avoid news fatigue, news desertification and increase the quality of local news. With the utilisation of AI tools, this can connect underserved communities with relevant news but also provide advertising opportunities for local businesses and consumers.

Uvod

Važnost javnih rasprava, progresivne regulative i razvoja veština za delovanje i rad usred digitalne medijskog sektora se ne može preceniti. Zakonodavni i praktični aspekti proizvodnje sadržaja s jedne strane, te pristupa pouzdanim informacijama sa druge su izazovi koji donosi digitalna disrupcija u medijskom sektoru, i koja su goruća pitanja za sve zainteresovane strane. Ovaj priručnik pruža uvid u stanje na Zapadnom Balkanu u odnosu na (ne)kompatibilnost sa vrednostima i medijskim standardima EU na novonastalom, ali još uvek u velikoj meri neregulisanom tržištu vesti. Publikacija ima pojačan fokus na Bosnu i Hercegovinu i Srbiju u okviru projekta ***Priprema medija u Bosni i Hercegovini i Srbiji za digitalno doba***, podržanog u sklopu Transition Promotion Programme-a Ministarstva inostranih poslova Češke Republike.

EU dimenzija

U medijskom okruženju brzih promena televizija i dalje ostaje glavni izvor vesti za 75% građana EU, posebno među starijim osobama. Pored toga, 43% potrošača vesti koristi onlajn platforme, 39% radio, ali već sad 26% prati vesti putem društvenih mreža i blogova. Štampane novine imaju najmanji – i postepeno ali sugurno opadajući – uticaj, redovno dostižući samo 21% publike.¹ Ako ovo uporedimo sa činjenicom da 88% anketiranih pristupa vestima putem pametnih telefona ili računara, projekcije sugerišu da će dnevne novine skoro u potpunosti nestati na globalnom nivou do 2030. godine, dok će se linearno emitovanje televizijskog i radio sadržaja takođe smanjiti na sličan način.

¹ <https://europa.eu/eurobarometer/surveys/detail/2693>

Oslanjanje samo na konkurenciju na informacionom tržištu bez ikakve ili malo regulacije u ovakvom medijskom ekosistemu izlaže i novinare i medijske kuće izazovima bez presedana. Takođe ostavlja publiku bez ikakvih garancija u pristupu pouzdanim vestima. EU regulative bi stoga trebalo da zaštite radno okruženje, da obezbede pristup pouzdanim informacijama, da koče lažne vesti i govor mržnje, da zaštite novinare, medijsko osoblje i novinarske kuće, ali i da regulišu platforme za deljenje sadržaja i društvene medije.

Suočavajući se sa ovim tektonskim promenama, inicijative digitalnih medija povezuju se sa **Europe's Media in the Digital Decade: An Action Plan to Support Recovery and Transformation**.² Kao sveobuhvatni policy program 2020-ih, uveo je relevantne politike i zakonodavne mere, kao što su Digital Services Act (DSA), Digital Markets Act (DMA), Artificial Intelligence Act (AI Act) i – verovatno najrelevantniji iz perspektive tumačenja i konzumiranja vesti – European Media Freedom Act (EMFA). Radeći simultano sa **Audiovisual Media Services Directive** (AVMSD), koja reguliše koordinaciju nacionalnog zakonodavstva svih audiovizuelnih medija na nivou EU – tradicionalnim TV prenosima kao i on-demand servisa – ovi koraci obuhvataju prekretnice regulacije digitalnih medija za države članice. Međutim, oni predstavljaju i horizont usklađivanja svim zemljama, koji su kandidati za članstvo u EU.

U principu, poslednja revizija AVMSD-a ostaje primenljiva na one usluge koje postoje da bi informisale, zabavljale ili obrazovale publiku. Ako gledamo informativni sadržaj iz perspektive digitalne disrupcije, AVMSD propisuje da nacionalna regulatorna tela unutar EU moraju, između ostalog, da zaštite pluralizam medija, da deluju u skladu sa unutrašnjim tržištem i da promovišu fer konkurenciju. Oni moraju biti nezavisni od vlade i njihove odgovornosti moraju biti definisane zakonom. Oni treba da imaju izvršna ovlašćenja i resurse neophodne

² <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52020DC0784&from=EN>

za ispunjavanje njihovih zadataka, u pogledu osoblja, stručnosti i finansijskih sredstava. Konačno, izbor, zamena i rad službenika na čelu ovih regulatornih agencija takođe moraju biti transparentni.³

DSA i DMA imaju za cilj da stvore bezbedniji digitalni prostor gde su zaštićena osnovna prava korisnika i da uspostave jednake uslove za poslovanje. Što se tiče digitalnih medija, to se uglavnom odnosi na društvene mreže i platforme za deljenje sadržaja. Sa ciljem da obuzda dezinformacije, govor mržnje, ciljano (političko) oglašavanje za korisnike, ali i da omogući slobodan protok ideja i komentara, cilj DSA i DMA je da podjednako zaštite i publiku i novinare. Oni osiguravaju da ljudima daju veću kontrolu nad onim što vide na mreži. Kako sve veći broj korisnika prati vesti na društvenim medijima, gde su političko oglašavanje, lažne vesti i video snimci iz nejasnih izvora često „u sendviču“ između pravilno uređenih interpretacija aktuelnih događaja, ovi akti bi trebalo da obezbede sigurnije, pravednije i transparentnije platforme za distribuciju vesti. Sa ovim je povezan okvir za sprovođenje, sa punim setom istražnih i sankcionih mera koje mogu preduzeti nacionalne vlasti i Evropska Komisija.⁴

Usko vezano za ovo je AI Act. Fokusirajući se na regulisanje upotrebe veštačke inteligencije, a ne na samu tehnologiju, Zakon predstavlja evropski odgovor na slične propise u SAD, Velikoj Britaniji ili Kini. Rešavajući transparentnost u kreiranju sintetičkog sadržaja vesti, Zakon se povezuje sa redakcijama u smislu AI sistema „ograničenog rizika“. U tom smislu, trebalo bi da ukaže na mašinski pisani tekst i da koči dezinformaciju koja proizilazi iz veštačke inteligencije, kao deep-fakes slika, audio i video zapisa.

Naposletku, najneposrednija inovacija je EMFA, prvi zajednički okvir za medijske usluge na unutrašnjem tržištu. Kao sveobuhvatni propis na nivou EU, on se,

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L1808>

⁴ <https://digital-strategy.ec.europa.eu/en/policies/dsa-enforcement>

između ostalog, bavi zaštitom uređivačke nezavisnosti i nezavisnosti javnih medija, upotrebom špijunskog softvera protiv medija, transparentnim državnim oglašavanjem i zaštitom medijskog sadržaja na mreži. Takođe predlaže osnivanje novog nezavisnog European Board for Media Services, sastavljenog od nacionalnih medijskih uprava, koji će pratiti medijske slobode na nivou država članica. Nastojeći da zaustavi političko mešanje u uređivačke odluke, zarobljavanje medija i da obezbedi transparentnost i stabilno finansiranje javnih medija, EMFA bi takođe trebalo da obezbedi dostupnost onlajn sadržaja na različitim platformama.

Važno je napomenuti da su sve ove inicijative pokrenute u proteklih nekoliko godina. U tom smislu, donedavno mediji EU, koji informišu skoro pola milijarde građana, nisu odgovarali nikakvoj sveobuhvatnoj medijskoj politici.⁵

Dimenzija Zapadnog Balkana

Prelazak na digitalnu potrošnju ugrožava tradicionalne medije. Televizija je i dalje glavni izvor vesti za građane Zapadnog Balkana (WB6), prateći trendove EU,⁶ ali upotreba interneta i društvenih medija ubrzano raste.⁷ U Srbiji je studija iz 2022. pokazala da iako su društveni mediji u upotrebi nadmašili TV vesti, televizija je i dalje primarni izvor, dok su se mlađi građani oslanjali na društvene medije kao glavni izvor vesti⁸ — trend koji se takođe primećuje i u Bosni i Hercegovini.⁹ Dok je Kosovo već odavno ostalo bez dnevnih štampanih novina, druge zemlje WB6 će verovatno slediti ovaj obrazac i postepeno obustaviti dnevno

⁵ Brankica Petković and Sandra Bašić-Hrvatin: *EU enlargement policy and the media: a political or a technical issue?*. In: Pier Luigi Parcu – Elda Brogi (ed.): *Research Handbook on EU Media Law and Policy*. Edward Elgar Publishing. 2021. 397–406.

⁶ <https://europa.eu/eurobarometer/surveys/detail/2693>

⁷ <https://www.iri.org/wp-content/uploads/2022/06/BALKANS-22-RS-01-Full-deck-1.pdf>

⁸ <https://www.osce.org/files/f/documents/5/6/549442.pdf>

⁹ https://www.media.ba/sites/default/files/stetni_narativi_-_web_pages.pdf

štampanju verovatno do sredine 2030-ih. Digitalna tranzicija je takođe uticala na tradicionalne medije pošto su prihodi od oglašavanja prebačeni na digitalne platforme,¹⁰ što je rezultiralo dezertifikacijom vesti i povećanim državnim subvencijama, dok velike kompanije poput Googla dominiraju prihodima od reklama.¹¹

Tradicionalni mediji se bore da modernizuju svoje poslovanje. Štampani mediji su doživeli drastičan pad u tiražu sa samo nekoliko medija koji su se transformisali u digitalne operacije. Neki od primera koji su uspešno prešli na hibridni štampano-digitalni model su Blic i Danas u Srbiji i Oslobođenje u BiH. Međutim, oni su to učinili sa relativnim uspehom kada je u pitanju održavanje novinarskih profesionalnih standarda. Javni emiteri poput RTS-a u Srbiji ili MRT-a u Severnoj Makedoniji bore se da modernizuju svoje poslovanje.¹² Uspešne tranzicije zahtevaju ulaganje u sadržaj zasnovan na podacima, diversifikaciju tokove prihoda (npr. crowdfunding), te ciljanje na određene niše – što mali broj medija može da priušti. Uspešne priče u donatorskim kampanjama koje podržavaju slobodnu štampu zabeležene su u Srbiji,¹³ dok su neki mediji uveli on-demand sadržaj i nove formate (npr. podcast).

Nedostatak propisa o digitalnim medijima omogućava političku manipulaciju. Zbog nedostatka zakonskih preduslova poslednjih godina došlo je

¹⁰ https://www.masee.org/images/pdf/MASEMedijiUCrnoj_GoriAnalizaMedijskeIndustrije.pdf

¹¹ https://www.masee.org/images/pdf/MASEMedijiUCrnoj_GoriAnalizaMedijskeIndustrije.pdf

¹² https://neighbourhood-enlargement.ec.europa.eu/document/download/5f0c9185-ce46-46fc-bf44-82318ab47e88_en?filename=North%20Macedonia%20Report%202024.pdf

¹³ <https://rm.coe.int/msi-res-2022-08-good-practices-for-sustainable-media-financing-for-sub/1680adf466>

do proliferacije web portala bez deklarisanog vlasništva ili strukture finansiranja. Odsustvo čvrstih okvira za regulisanje onlajn platformi omogućava širenje dezinformacija, koje često pojačavaju politički motivisani akteri. Vlasničke strukture su neprozirne, sa politički povezanim akterima koji koriste medije kao oruđe za propagandu, dok je državno oglašavanje neproporcionalno alocirano na provladine kuće, narušavajući tržište i ometajući nezavisnu digitalnu transformaciju.¹⁴ Dok se u Bosni i Hercegovini anonimni portali pojavljuju kao dominantni mehanizam malignog uticaja, botovi na društvenim mrežama preuzimaju primat u većem delu regiona.¹⁵ U Srbiji se veliki broj naloga i grupa ponaša „koordinisanim neautentičnim ponašanjem“ kako bi podržali predsednika Aleksandra Vučića i kritikovali političku opoziciju. Aktivnosti državnih službenika navodno su snimljene na meta-društvenim mrežama,¹⁶ X-u (Twitter)¹⁷ i drugima.

Nivoi medijske pismenosti su ispod standarda i niskog prioriteta za vlade

WB6. Zapadni Balkan je među deset zemalja koje su imale najmanje rezultate na Evropskom indeksu medijske pismenosti 2023, pri čemu Srbija i Crna Gora spadaju u pretposlednji, a ostale u poslednji klaster.¹⁸ Uprkos tome, ne postoji sistemski pristup unapređenju medijske pismenosti u regionu, ostavljajući publiku podložnom manipulaciji. Bosna i Hercegovina trenutno nema strategiju posvećenu medijskoj pismenosti i sigurnoj upotrebi novih medija.¹⁹ Dok medijska strategija Srbije za period 2020-2025. naglašava digitalnu transformaciju

¹⁴ <https://birnsrbija.rs/transparentnost-pod-lupom-javne-nabavke-za-medijske-usluge/>

¹⁵ <https://www.balcanicaucaso.org/eng/Areas/Bosnia-Herzegovina/Disinformation-and-anonymous-portals-in-Bosnia-204485>

¹⁶ <https://about.fb.com/wp-content/uploads/2023/02/Meta-Quarterly-Adversarial-Threat-Report-Q4-2022.pdf>

¹⁷ https://fsi-live.s3.us-west-1.amazonaws.com/s3fs-public/serbia_march_twitter.pdf

¹⁸ <https://osis.bg/wp-content/uploads/2023/06/MLI-report-in-English-22.06.pdf>

¹⁹ <https://megafon.ba/medijska-i-informacijska-pismenost-zbog-cega-je-potrebna-drugaciji-pristup/>

i usklađivanje sa EU, ona se bori sa praktičnim sprovođenjem, posebno u pogledu nadzora društvenih medija. Organizacije civilnog društva godinama ulažu napore da unaprede medijsku pismenost u regionu,²⁰ u programima koje podržava EU ili drugi međunarodni donatori. Nažalost, ovaj trend će se verovatno nastaviti i zadržati u nevladinom sektoru, pošto nacionalne vlade često tretiraju medijsku pismenost kao aktivnost niskog prioriteta, ostavljajući publiku podložnom dezinformacijama.

Nedostaje usklađivanje sa digitalnim politikama EU, što je složeno zbog neadekvatnih odgovora na izazove. Nedavne inicijative EU koje se fokusiraju na medije i odnose se na njih i ekonomski, ali i kao javno dobro su obećavajuće. Sveobuhvatni programi politike uključuju: Zakon o digitalnim uslugama (DSA), Zakon o digitalnim tržištima (DMA), Zakon o veštačkoj inteligenciji (AI Act) i Evropski zakon o slobodi medija (EMFA). Zajedno i radeći u koordinaciji sa Direktivom EU o audiovizuelnim medijskim uslugama, ona predstavlja horizont usklađivanja za zemlje u okruženju. Međutim, pre nego što je predstavljao sveobuhvatnu medijsku politiku, WB6 nije imao unitarni model prema čemu bi se ravnao. Usklađivanje sa nejasnim indikacijama Poglavlja 10 EU *acquis-a* rezultiralo je pojedinačnim zakonima o digitalnim izazovima, uspostavljajući neka pravila u vezi sa digitalnim uslugama i tržištima na nacionalnom nivou. Zbog neadekvatnog odgovora prošlih zakona na trenutne izazove ovi okviri zaostaju, dok diverzifikacija u domaćim okvirima onemogućava sistemski regulatorni pristup u slučajevima u dobro pokrivenim oblastima.²¹

²⁰https://www.media.ba/sites/default/files/media_and_information_literacy_in_the_western_balkans_unrealized_emancipatory_potential_final.pdf

²¹ https://www.sharefoundation.info/wp-content/uploads/SHARE_DSA-DMA-AIA-STUDY.pdf

Dezinformacija napreduje onlajn širom Zapadnog Balkana, dok ne postoji regionalna primena koja bi ograničila uticaj. Čak i ako je lokalno zakonodavstvo usklađeno sa DSA, kao presedan u borbi protiv lažnih vesti i obezbeđivanju sigurnijih i transparentnijih onlajn prostora, glavne platforme kao Facebook i X (Twitter) nisu u obavezi da sprovode propisane mere. Iako platforme povremeno uklanjaju lažni sadržaj, odsustvo snažnih regionalnih mehanizama za sprovođenje značajno ograničava uticaj – pošto WB6 ne potpada pod jurisdikciju tržišta EU. Zauzvrat, platforme su uvele fact-checking programe u saradnji sa lokalnim organizacijama, ali su ti napori ograničeni i često isključuju manje zemlje Zapadnog Balkana. U međuvremenu, širenje dezinformacija navodi se kao ključni faktor koji ometa pristupanje Srbije, Albanije i Severne Makedonije u EU.²² Sputnik News i Russia Today su značajni izvori, dostupni u Srbiji i na latiničnom i na ćirilicnom pismu,²³ i tako dopiru do publike u Bosni i Hercegovini, Kosovu, Hrvatskoj, Crnoj Gori, Severnoj Makedoniji, pa čak i Bugarskoj. Da ne pominjemo dijasporu iz WB6 u EU i globalno. Neregulisani srpski onlajn medijski pejzaž predstavlja rizik, jer je digitalizacija značajno olakšala širenje i omogućila regionalnim igračima da steknu vidljivost i ostvare uticaj izvan svojih matičnih tržišta.

Vlasništvo nad telekomunikacionom infrastrukturom ima rastuću političku ulogu, sa povećanjem nacionalnih i međuregionalnih monopola. Telekom Srbija ima tržišni udeo od 54,2% u distribuciji medijskih sadržaja, dok SBB (u vlasništvu United grupe) ima udeo od 38,5%. Preostali deo drže operateri sa pojedinačnim udelom manjim od četiri odsto.²⁴ Među 10 najrelevantnijih

²² <https://scidevcenter.org/wp-content/uploads/2024/10/COUNTERING-DISINFORMATION-ABOUT-EU-INTEGRATION-IN-THE-MEDIA.pdf>

²³ <https://www.osce.org/files/f/documents/5/6/549442.pdf>

²⁴ https://www.ratel.rs/uploads/documents/empire_plugin/Pregled%20trzista%20Q3%202024.pdf

TV grupa aktivnih u Evropi, tri su u okviru United Group Serbia (privatno lice) sa ukupno 119 kanala širom Evrope. Telekom Srbija (u vlasništvu Vlade Srbije kao javno preduzeće) sa 67 kanala širom regiona WB6 i Pink Media Group (privatno lice) sa kanalima širom WB6 regiona.²⁵ Kao ozloglašen primer širom regiona u pogledu monopola i koncentracije državnog finansiranja, Telekom Srbija je preuzeo sve kablovske operatere u srpskim enklavama južno od reke Ibar na Kosovu,²⁶ većinske akcije u Telekomu Srpske (Bosna i Hercegovina) i mtel-u (Crna Gora). To predstavlja međuregionalni monopol, jer količina sadržaja koju može da širi može da predstavlja opasnost za demokratski dijalog ne samo u Srbiji, već i u celom regionu WB6.

Upotreba veštačke inteligencije, kao rastuća zabrinutost, skoro je potpuno neregulisana. U WB6, domaći pravni okviri nisu usklađeni sa normama da bi se obezbedio nadzor, transparentnost, prevencija štete ili rešavanje štetnih efekata veštačke inteligencije. Studija iz 2024. godine pokazala je da zakoni „ne pokrivaju“ ove oblasti u Bosni i Hercegovini, Kosovu i Crnoj Gori sa stopama između 95%-100%. Srbija se ističe kao najnaprednija među WB6, pošto je pokrila 32% i delimično 26% pravila koja se odnose na veštačku inteligenciju u domaćem zakonu.²⁷ U maju 2024. godine formirana je radna grupa za Zakon o veštačkoj inteligenciji, ali nacrt zakona još uvek nije dostupan javnosti. Međutim, kontroverze oko korišćenja izmanipulisanih snimaka i deepfakes-a već su ušle u redakcije, sa navodnim simetričnim odgovorima na takav sadržaj koji ciljaju

²⁵ <https://rm.coe.int/audiovisual-media-services-in-europe-2024-edition-a-schneeberger/1680b0dc9a>

²⁶ <https://n1info.rs/vesti/telekom-preuzeo-sve-kablovske-operatere-u-srpskim-enklavama-južno-od-ibra/>

²⁷ https://www.sharefoundation.info/wp-content/uploads/SHARE_DSA-DMA-AIA-STUDY.pdf

na vladine zvaničnike, a ne na građane i opoziciju.²⁸ Navodni video vlasnika Pink Media Group podeljen na platformi X naglašava hitnu potrebu da se reguliše zloupotreba veštačke inteligencije u proizvodnji deepfake sadržaja, kao i važnost upotrebe AI alata za efikasnu borbu protiv dezinformacija. Upotreba deepfakesa je u porastu širom regiona, sa znatnim porastom u Republici Kosovo 2023. godine, ciljajući pojedince da naruše reputaciju i poseju podele.²⁹ Trenutno ne postoje kazne ili druge sankcije u kontekstu razvoja i korišćenja AI sistema, a saradnja sa platformama je najneposredniji put.

Iako je ogromna većina novinara stekla digitalne veštine u proteklim decenijama, pojava veštačke inteligencije u redakcijama uvodi novi nivo medijske pismenosti. Spremnost novinara da prepoznaju, ali i da iskoriste nove tehnologije je ključna. Medijske organizacije su počele da eksperimentišu sa AI alatima uglavnom za prevođenje i transkripciju, a manje za proizvodnju sadržaja, proveru činjenica i angažovanje javnosti. Što se tiče odgovornosti novinara u Srbiji, novim Nacrtom Kodeksa novinarske etike, predloženo je da se uvede posebna smernica da mediji mogu koristiti veštačku inteligenciju za kreiranje sadržaja na društveno odgovoran i srazmeran način, ali su dužni da obavestiti javnost da je medijski sadržaj kreiran pomoću alata zasnovanih na veštačkoj inteligenciji. Ističe se i da takav sadržaj podleže uređivačkoj odgovornosti, ne oslobađajući novinare i urednike od obaveze pridržavanja Kodeksa.³⁰

Sve veća upotreba onlajn medija negativno je uticala na bezbednost novinara. Online sfera menja anatomiju napada, pritisaka i pretnji upućenih

²⁸ <https://balkaninsight.com/2024/07/04/serbia-reacts-fast-over-ai-deepfake-video-of-pm-unlike-other-cases/>

²⁹ <https://birn.eu.com/wp-content/uploads/2023/12/01-BIRN-Digital-Rights-Violations-Annual-Report-2022-2023.pdf>

³⁰ <https://nuns.rs/poziv-na-javnu-raspravu-izmene-kodeksa-novinarar-srbije/>

novinarima. Stalni pristup novinarima i porast pretnji su sve više u korelaciji.³¹ NUNS je u 2024. godini u regionalnoj bazi podataka SafeJournalists.net zabeležio 74 napada i pretnje novinarima i medijima, uz 48 incidenata na mreži, uključujući dva DDoS (distributed denial of service) napada na sajtove, dok su ostali pretnje smrću i druge pretnje upućene novinarima putem e-maila, direktnih poruka putem komunikacionih aplikacija, komentara i društvenih medija. Digitalne pretnje su posebno štetne jer je teško identifikovati krivce. U Srbiji, formalno prijavljivanje ovih zločina vlastima izaziva zabrinutost zbog nekažnjivosti, jer novinari navode da se izveštaji „zaglave u tužilaštvu.“³² Druga zabrinutost je da u ovom okruženju, kako je zabeleženo u Albaniji, novinari praktikuju autocenzuru kako bi izbegli negativne onlajn kampanje i uznemiravanja.³³

³¹<https://detektor.ba/2023/11/02/nekaznjivost-napada-na-novinare-prijetnja-za-slobodu-govora-i-demokratsko-drustvo-u-bih/>

³² <https://birnsrbija.rs/wp-content/uploads/2023/07/Bezbednost-novinara-u-digitalnom-okruzenju.pdf>

³³ <https://birn.eu.com/wp-content/uploads/2023/12/01-BIRN-Digital-Rights-Violations-Annual-Report-2022-2023.pdf>

Preporuke

1. Promovisanje novinarstva zasnovanog na podacima i ohrabrivanje redakcija u usvajanju alata za analizu podataka, sa obukom novinara sa fokusom na data driven storytelling. Uključujući analitiku i vizualizaciju, mediji mogu da se razviju u ponudi detaljnog izveštavanja, privlačeći na taj način mlađu, još ne-adresiranu publiku. Bliska saradnja sa tech-kompanijama i nevladinim organizacijama može ubrzati ovu promenu.

2. Sa sve većom penetracijom pametnih telefona, davanje prioriteta sadržaju optimizovanom za mobilne uređaje i strategijama za mobilne uređaje trebalo bi da budu prioritet širom WB6. **Razvijanjem responsivne web stranica,** mobilnih aplikacija i sadržaja prilagođenog platformama društvenih bi efikasno angažovali čitaoce sa sadržajem pogodnim za 2030-te.

3. Povećanje pristupačnosti i personalizaciju uvođenjem algoritama vođenih veštačkom inteligencijom za preporuku sadržaja i uvećanu pristupačnosti, kao što su podrška za pretvaranje teksta u govor i višejezična podrška. Isto tako je važno i razvijanje personalizovanog sintetičkog sadržaja za radio. Ovo može zadovoljiti širu publiku, pružiti veću granularnost u korisničkom iskustvu, uključujući osobe sa invaliditetom i govornike kojima maternji jezik nije iz WB6.

4. Ojačati cyber-bezbednost i poverenje u digitalne platforme putem širokih i sveobuhvatnih programa medijske pismenosti koje finansira država. Važan fokus je na dezinformaciji, te je bitno osigurati bezbednu distribuciju vesti primenom robusnih mera cyber bezbednosti i mehanizama verifikacije. Investiranje u pre-bunking i proveru činjenica za izradu poverenja među potrošačima vesti.

5. Podsticati lokalno novinarstvo. Razvijanje digitalnih platformi za podršku lokalnom i hiperlokalnom novinarstvu za izbegavanje zamora od vesti (news fatigue), informacionih pustinja (news desertification) i povećanja kvaliteta lokalnih vesti. Uz korišćenje alata veštačke inteligencije, ovo može da poveže

zajednice koje nemaju redovan pristup relevantnim vestima, ali i da pruži mogućnosti za oglašavanje lokalnim preduzećima i potrošačima.