

SHADOW REPORT ON THE RESULTS ACHIEVED UNDER THE ACTION PLAN FOR THE IMPLEMENTATION OF THE STRATEGY FOR THE DEVELOPMENT OF THE PUBLIC INFORMATION SYSTEM IN THE REPUBLIC OF SERBIA UNTIL THE END OF 2022

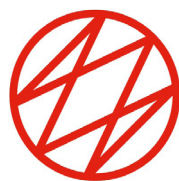
Authors: Tamara Filipović Stevanović **and** Rade Đurić

This report was produced within the project “**Strengthening Media Capacity for Media Sector Reform in Serbia**” supported by the European Commission (Contract No. 2022/441-670), and implemented by the Media Association, the Association of Online Media (AOM), the Independent Journalists’ Association of Serbia (IJAS/NUNS), and the Business Association of Local and Independent Media “Local Press,” in the period February 2023 - January 2025.



ASOCIJACIJA MEDIJA

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



**ASOCIJACIJA
ONLAJN
MEDIJA**

ASOCIJACIJA ONLAJN MEDIJA

Radanska 10, Niš
MB: 28178158
PIB: 109063306



NEZAVISNO UDRUŽENJE NOVINARA SRBIJE

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



LOKAL PRES

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

SHADOW REPORT ON THE ACHIEVED RESULTS FROM THE ACTION PLAN FOR THE IMPLEMENTATION OF THE STRATEGY FOR THE DEVELOPMENT OF THE PUBLIC INFORMATION SYSTEM IN THE REPUBLIC OF SERBIA UNTIL THE END OF 2022

ACTION PLAN TABLE FOR REALISATION OF OBJECTIVES AT THE LEVEL OF GENERAL OBJECTIVES AND SPECIFIC OBJECTIVES

Public policy document:	Strategy for the Development of the Public Information System in the Republic of Serbia for the Period 2020-2025
Action Plan:	Action Plan for the Implementation of the Strategy for the Development of the Public Information System in the Republic of Serbia for the Period 2020-2025 in the period 2020-2022
Coordination and reporting	Ministry of Culture and Information

General objective: Improved public information system through a harmonised positive legal framework that guarantees freedom of expression, media freedom, safety of journalists, media pluralism, developed media market, empowered journalists, citizens who are educated and institutions capable of implementing regulations

Institution responsible for monitoring and supervising the implementation: Ministry of Culture and Information

Indicator(s) at the level of the general objective (outcome indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in the last year of AP / realised value	Final year of AP validity / realised value
The Republic of Serbia progress from the Annual Progress Report in the part related to the media freedom and freedom of expression	No progress / Limited progress / some progress	Annual Progress Report for Serbia	No progress	2020	Some progress / no progress	2022 / no progress
Media Freedom Index	Republic of Serbia's position in the ranking list	Reporters without Borders Report	93	2020	Improving the position by five to ten ranks on the annual basis / 79	2022/91
The Republic of Serbia's progress in the part of the Progress Report referring to the freedom of expression	Score (od 0 to 4)	Freedom in the World Report	2	2020	3/2	2022/2

Specific objective 1: Improved safety, socio-economic and professional working conditions for journalists and media workers;							
Institution responsible for monitoring and supervising the implementation: Ministry of Culture and Information							
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2020 / realised value	Target value in 2021 / realised value	Target value in the last year of AP 2022 / realised value
Criminal offences, reported to the prosecutor's office, which were directed against journalists and media workers	Number	Report of the Supreme Public Prosecutor's Office	59	2019	A minimum 10 percent reduction in the number of criminal offences against journalists and media workers compared to the previous year / 60	A minimum 10 percent reduction in the number of criminal offences against journalists and media workers compared to the previous year / 87	A minimum 10 percent reduction in the number of criminal offences against journalists and media workers compared to the previous year / 87
Number of journalists exposed to threats and violence	Number	Regional database of attacks against journalists	63	2019	72	A minimum 10 percent reduction in the number of journalists and media workers exposed to threats and violence compared to the baseline / 66	A minimum 10 percent reduction in the number of journalists and media workers exposed to threats and violence compared to the baseline / 56
Progress in examining the facts revealed in the investigations conducted relating to the murders of journalists.	No progress / progress to some extent / progress achieved	Progress in examining the facts revealed in the investigations conducted relating to the murders of journalists.	Progress to some extent	2019	No target value / No progress	No target value / No progress	Progress achieved / No progress

Specific objective 2: A functional, sustainable and fair media market protected from political influence has been established;							
Institution responsible for monitoring and supervising the implementation: Ministry of Culture and Information							
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2020 / realised value	Target value in 2021 / realised value	Target value in the last year of AP 2022 / realised value
Media Sustainability Index	Score (1 to 4)	IREX Annual report ¹	1,45	2019	No data	Vibrant Information Barometer, result is 15 out of maximum 40	2,45 / Vibrant Information Barometer, result is 15 out of maximum 40
Audience concentration, vertical concentration and political control over media financing	High risk / Medium risk / Low risk	Media Ownership Monitor Survey ²	High risk	2018	No data	No data	Medium risk / No data
Regulatory provisions for the prevention of concentration, regulatory provisions for vertical concentration, transparency of ownership and political control over news agencies	High risk / Medium risk / Low risk	Media Ownership Monitor Survey	Medium Risk	2018	No data	No data	Low risk / No data
Political control over distribution networks	High risk / Medium risk / Low risk	Media Ownership Monitor Survey	Medium to High Risk	2018	No data	No data	Medium risk / No data

Specific objective 3: Functional, competent, professional and open institutions with mechanisms for protection from external pressures and consistent implementation of public policies and regulations;

Institution responsible for monitoring and supervising the implementation: Ministry of Culture and Information

Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2020 / realised value	Target value in 2021 / realised value	Target value in the last year of AP 2022 / realised value
Unenforced decisions of the Office of the Commissioner for Information of Public Importance and Personal Data Protection	Number	Unenforced decisions of the Office of the Commissioner for Information of Public Importance and Personal Data Protection	382	2018	No target value / 281	330 / 262	280 / 148

Specific objective 4: High-quality, pluralistic and diverse media content that meets the information needs of different social groups;							
Institution responsible for monitoring and supervising the implementation: Ministry of Culture and Information							
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2020 / realised value	Target value in 2021 / realised value	Target value in the last year of AP 2022 / realised value
Media Sustainability Index in the part related to the media content plurality	Score (1 to 4)	IREX Annual Report in the part News plurality of news sources	1,51	2019	No data	No target value set / 13	2,5 / 13
Imposed measures by the Regulatory Authority for Electronic Media	Reprimand / Warning / Ban on broadcasting	The Regulatory Authority for Electronic Media Report adopted in entirety	4 reprimands 3 warnings	2019	No target value set / 8 warnings, 2 reprimands, 3 temporary bans	No target value set / 6 warnings, 2 reprimands, 1 temporary ban	2 reprimands / 1 warning / 4 reprimands
Measures imposed by the Complaints Commission of the Press Council for the violation of the provisions of the Serbian Journalists' Code of Ethics	Number	Press Council Annual Report	42	2019	No target value set / 92	A min 10% reduction in the measures imposed for the violation of the Serbian Journalists' Code of Ethics compared to the baseline / 80	A min 10% reduction in the measures imposed for the violation of the Serbian Journalists' Code of Ethics compared to the previous year / 62
Number of times the Serbian Journalists' Code of Ethics has been violated	Number	Monitoring of the Journalists' Code of Ethics observance in daily papers		2019	3724	5715	2653 ³

Specific objective 5: Improved professional knowledge and developed digital competencies of citizens, institutions, media, journalists and media workers in the media environment;							
Institution responsible for monitoring and supervising the implementation: Ministry of Culture and Information							
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2020 / realised value	Target value in 2021 / realised value	Target value in the last year of AP 2022 / realised value
Citizen's media literacy	Score (0 to 1)	CESID Annual Report	0,68	2019	No target value set / 0,65	No target value set / 0,65	0.78 / No data
Citizen's digital literacy	Score (0 to 1)	CESID Annual Report	0,73	2019	No target value set / 0,70	No target value set / 0,70	0,83 / No data
Digital competences of journalists and media workers and employees in institutions	Number of trainings	CERT Report maintains statistical data on number of trainings			No target value set / No data	No target value set / No data	No target value set / No data
Citizen's digital competence	Percentage	Statistical Office of the Republic of Serbia Report	34.2% of computer literate and 14.8% of partially computer literate persons	2018			Increase of at least 10% in the No of computer literate and partially literate persons / 45.73% of computer literate and 29.62% of partially computer literate persons

LAW ON PUBLIC INFORMATION AND MEDIA				
Serial No	Activity	Competent institution	AP deadline	Comment
1.3.1	Amending the regulations related to the protection of journalistic sources, by stipulating the elements of that right	Ministry of Culture and Information	End of 2021	Not done
1.5.1	Amend the regulations to guarantee the rights of journalists in relation to media owners and management	Ministry of Culture and Information	End of 2021	Not done
1.5.1	Amending the regulations should guarantee the rights of editors in relation to orders from media owners and management, and especially with regard to the possibility of editors being dismissed if they refuse to carry out an order	Ministry of Culture and Information	End of 2021	Not done
2.1.1	Amending the regulations to precisely define the scope of data from the appropriate registers in reference to the ownership structure of media publishers, all monetary and other payments from public revenues from all sources, and other data relevant for exercising influence over the media	Ministry of Culture and Information	End of 2021	Not done
2.1.1	Ensure mechanisms for up-to-date submission of data to the Media Register by amending the regulations	Ministry of Culture and Information	End of 2021	Not done
2.1.1	By amending the regulations, establish clear criteria for deleting media from the Media Register, as well as the obligation of the Registrar to delete from the Media Register all media outlets that are not registered in accordance with the law	Ministry of Culture and Information	End of 2021	Not done
2.1.1	By amending the regulations, establish appropriate sanctions for non-compliance with legal provisions	Ministry of Culture and Information	End of 2021	Not done
2.1.1	Amending the regulations to define the procedure and method of performing control regarding the registration and data update in the Media Register	Ministry of Culture and Information	End of 2021	Not done
2.2.3	Establish measurable criteria for measuring media concentration thresholds by amending the regulations	Ministry of Culture and Information	End of 2021	Not done
2.3.5	By amending the regulations, improve the existing system of control and the method of its implementation in relation to the continuity of production and distribution of media content and the privatised media meeting other legal and programme scheme obligations	Ministry of Culture and Information	End of 2021	Not done
2.3.9	Establish a Production Register by amending the regulations and ensure visibility of the data on funds allocated to legal entities, i.e. entrepreneurs engaged in the production of media content	Ministry of Culture and Information	End of 2021	Not done
3.1.1	Establish additional oversight mechanisms (such as inspection) through regulatory amendments	Ministry of Culture and Information	End of 2021	Not done

Serial No	Activity	Competent institution	AP deadline	Comment
4.1.2	By amending the regulations provide for stable, transparent and non-discriminatory sources of funding, as well as mechanisms for the financial sustainability of media outlets whose publishers were founded by national councils of national minorities, equally for all publishers on the territory of the Republic of Serbia	Ministry of Culture and Information	End of 2021	Not done
4.1.2	By amending the regulations prescribe clear criteria for the allocation of funds through competitions for co-financing and procedures for the evaluation of media projects related to the production and distribution of media content in the languages of national minorities	Ministry of Culture and Information	End of 2021	Not done
4.1.2	By amending the regulations, recognise the production of media content that promotes interculturality as a special segment of public interest	Ministry of Culture and Information	End of 2021	Not done
4.1.2	By amending the regulations provide that national councils of national minorities shall submit a non-binding opinion in advance to public authorities that announce public competitions for project co-financing in national minority languages, on the type of media content that a particular national community needs in order to improve the quality of information in its own language	Ministry of Culture and Information	End of 2021	Not done
4.2.1	Amendments to the regulations should prescribe clear obligations for media publishers in order to increase the availability of content for people with disabilities	Ministry of Culture and Information	End of 2021	Not done
4.4.1	Amendments to the regulations should stipulate the obligation to conduct an analysis of the needs for the lacking media content, which would lead to the announcement of a competition specifically for the lacking media content.	Ministry of Culture and Information	End of 2021	Not done
4.4.1	Amend the regulations to prescribe as an additional criterion in competitions for project co-financing the results of public debates in which citizens expressed their views on lacking media content	Ministry of Culture and Information	End of 2021	Not done
4.4.1	Amendments to the regulations should provide for the minimum funds necessary for the production of media content in the public interest at all levels of government within the prescribed deadlines and sanctions for non-compliance	Ministry of Culture and Information	End of 2021	Not done
4.4.1	Amendments to the regulations should prescribe the criteria for appointing committee members in the project co-financing procedure, their method of work and decision-making, and provide for training to increase and unify the capacity of persons who can be proposed as committee members	Ministry of Culture and Information	End of 2021	Not done
4.4.1	Amending the regulations to stipulate the obligation of independent evaluation of the implemented projects	Ministry of Culture and Information	End of 2021	Not done
4.4.1	Amend the regulations to prescribe effective sanctions for failure to comply with obligations regarding project co-financing	Ministry of Culture and Information	End of 2021	Not done
4.4.1	By amending the regulations, exclude the possibility that project co-financing is used for the purpose of covering costs other than the corresponding costs of producing content of public interest and prescribe penalties for non-compliance with these provisions	Ministry of Culture and Information	End of 2021	Not done

Serial No	Activity	Competent institution	AP deadline	Comment
4.4.1	By amending the regulations, introduce the centralised system for submitting application via single information platform	Ministry of Culture and Information	End of 2021	Not done
4.4.1	By amending regulations to stipulate that compliance with the Serbian Journalists' Code of Ethics as a mandatory criterion for using funds through project co-financing, in such a way that print and online media that compete for public funds must accept the jurisdiction of the Press Council	Ministry of Culture and Information	End of 2021	Not done
4.4.1	By amending the regulations, it is envisaged that priority in project co-financing of media content production under equal conditions will be given to media that comply with legal regulations and the Serbian Journalists' Code of Ethics, i.e. those that have fewer measures imposed by the REM and fewer decisions and public warnings issued by the Press Council.	Ministry of Culture and Information	End of 2021	Not done
4.4.1	By amending the regulations, provide for the obligation of an independent external audit of the financial statements of media outlets that have received funds in a public competition for co-financing media content above a certain amount and the mandatory publication of the results of such an audit	Ministry of Culture and Information	End of 2021	Not done
4.7.7	Amendments to the regulations should prescribe a ban on displaying pornographic content and scenes of violence on the front pages of print media, marking of inappropriate content on online media, etc., with mandatory sanctions for violations of such obligations	Ministry of Culture and Information	End of 2021	Not done
4.8.1	Redefine the concept of civil sector media by amending the regulations so that they are legally recognised as all non-profit media, regardless of the technology they use and regardless of their coverage area	Ministry of Culture and Information	End of 2021	Not done

CRIMINAL PROCEDURE CODE				
Serial No	Activity	Competent institution	AP deadline	Comment
1.3.4	Amend the regulations to define journalists as persons who, due to their duty to maintain professional secrecy, are exempt from the duty to testify if their testimony would violate the duty to maintain professional secret	Ministry of Justice	End of 2021	Not done

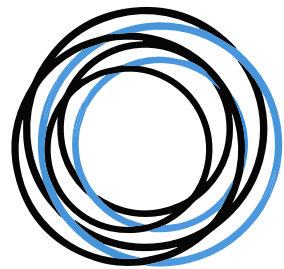
LAW ON FREE ACCESS TO INFORMATION OF PUBLIC IMPORTANCE				
Serial No	Activity	Competent institution	AP deadline	Comment
3.4.1	By amending the regulations, establish clear mechanisms for the enforcement of the Commissioner's final and enforceable decisions and establish the obligation of examining the Commissioner's reports	MPALSG	End of 2021	Not done

LAW ON COPYRIGHT AND RELATED RIGHTS				
Serial No	Activity	Competent institution	AP deadline	Comment
3.5.3	Amendments to the regulations should provide for a more flexible model for submitting data on the exploitation of copyright and related rights, in facilitated manner for users and without generating unnecessary additional costs, and which would be in line with the Regulation on the manner of keeping electronic records of broadcasting and rebroadcasting of copyright protected works	Ministry of Economy	End of 2021	Not done
3.5.3	Amendments to the regulations should prescribe the basic elements of the minimum tariff for the exploitation of copyright and related rights not exceeding the higher nominal amount than the basic tariff	Ministry of Economy	End of 2021	Not done
3.5.3	By amending the regulations, define the collective negotiation system so that the interests of users and holders of copyright and related rights are equally taken into account	Ministry of Economy	End of 2021	Not done
3.5.3	By amending the regulations, redefine the position of organisations for the collective protection of copyright and related rights and ensure the freedom to organise for holders of the copyright and related rights	Ministry of Economy	End of 2021	Not done
4.8.4	Amend the regulations to provide for preferential tariffs for the exercise of copyright and related rights in order to encourage the development of the civil sector	Ministry of Economy	End of 2021	Not done

LAW ON FEES				
Serial No	Activity	Competent institution	AP deadline	Comment
4.8.3	Encourage the development of civil society media through regulatory amendments, in particular by reducing radio frequency fees	Ministry of Finance	End of 2021	Not done

LAW ON PUBLIC PROCUREMENT				
Serial No	Activity	Competent institution	AP deadline	Comment
2.3.3	Amend the regulations to ensure that all data on funds allocated to media and legal entities, i.e. entrepreneurs engaged in the production of media content in procurement procedures to which public procurement regulations do not apply, are registered in the appropriate register; to establish the range of services that contracting authorities, within the meaning of the Law on Public Procurement, can procure from media and legal entities, i.e. entrepreneurs engaged in the production of media content; to specify the criteria for selecting media and legal entities, i.e. entrepreneurs engaged in the production of media content that provide services to contracting authorities	Ministry of Finance	End of 2021	Not done

LAW ON DONATIONS AND HUMANITARIAN AID				
Serial No	Activity	Competent institution	AP deadline	Comment
2.3.5	To prescribe conditions, i.e. restrictions, for the allocation of funds to media publishers in the form of donations and sponsorships by public authorities and public enterprises, public institutions and other enterprises that are majority-owned by public authorities	Ministry of Finance	End of 2021	Not done



KOALICIJA
ZA SLOBODU MEDIJA



**#EY
ЗА ТЕБЕ**

This publication was produced with the financial support of the European Union. Its contents are the sole responsibility of the authors, the Independent Journalists' Association of Serbia, and project partners and do not necessarily reflect the views of the European Union.