

Media outlets in the languages of national minorities - research and analysis

The author: Nedim Sejdinović

Belgrade, 2020



This publication was supported by the OSCE Mission to Serbia. The views expressed in this publication are solely those of the authors and do not reflect the official position of the OSCE Mission to Serbia.

Contents:

INTRODUCTORY REMARKS.....	04
SOCIO-POLITICAL CONTEXT IN WHICH MINORITY MEDIA OPERATE.....	08
LEGAL FRAMEWORK.....	14
MINORITY MEDIA IN THE NEW MEDIA STRATEGY.....	19
MEDIA OUTLETS WITH MEDIA CONTENT IN MINORITY LANGUAGES.....	21
ANALYSIS AND CONCLUSIONS.....	30

INTRODUCTORY REMARKS

The research of media outlets in the languages of national minorities, which operate on the territory of the Republic of Serbia, was conducted during November and December 2019. The document in front of you - which was written in the period from January to September 2020, in consultation with experts and stakeholders - is an attempt to provide an overview of a minority media scene, in the context of drafting the new Media Strategy and supporting documents, as well as the new laws and by-laws, and to produce conclusions and recommendations that would help to improve this area, both in terms of media sustainability and production of media content in national minority languages, and last but not least, in terms of increasing professionalism and reducing political influence of the majority and minority elites on minority information.

During this research and the accompanying analysis, the assumptions were confirmed that the minority media scene is quite chaotic, and that it is extremely difficult, practically impossible, to obtain all the data that would help us fully understand how it works, and also very difficult to collect in one place, or make a list of all minority and multilingual media. The current registers of these media outlets kept by the Business Registers Agency (APR) and the Regulatory Authority for Electronic Media (REM) are in fact insufficient, for the simple reason that they are not fully up-to-date or valid¹, but also because they do not reflect the real situation. It is not a rare case that some media outlets are registered as multilingual, but are actually monolingual, i.e. they report only in the majority, Serbian language. A reverse situation may happen, although much less often. Moreover, there are major differences among the multilingual media outlets: some of them have minority contents in a very small, almost negligible percentage², while others have a minority program as their primary activity. We will not go into the financing and co-financing of minority media outlets and content here, as we will deal with it later, however we will only state that there is a complete confusion in that field as well, for example due to significant differences in the practice of the state aid to minority media operating in the territory of the AP Vojvodina and to those operating in the rest of the country.

Media privatization, carried out in 2015 and 2016 - due to the course of the process of the state exit from media ownership³ - significantly reduced the level of information in the national minority

¹Many media outlets from these two registers have either practically or formally ceased to exist.

²In some cases, certain multilingual media outlets - primarily radio stations - produce only a few hours of minority program on a monthly basis.

³There were numerous omissions during the privatization of the media, and the legislators did not take into account what the media experts pointed out - that it is necessary to enter the privatization process with respect to the specifics of minority and multilingual media.

languages, and created even greater confusion on the minority media scene. According to certain data⁴, of the total number of media outlets that were subject to privatization, as many as 43 had programs in the languages of national minorities. Almost one third (14) of them were shut down, while some media outlets, despite the legal obligation⁵, cancelled the minority language program in the meantime. It should be noted that on 27 May 2015, the Privatization Agency and the Regulatory Authority for Electronic Media signed a Protocol on Cooperation under which the Agency undertook to submit to REM contracts on the sale of electronic media capital, for the purpose of control over the contractual obligations concerning the production of media content of public interest during a five year period, from the day of concluding the contract, while the obligation to ensure continuity rests upon the buyer. Violation of the obligation of continuity of public interest programs (including information in minority languages) is subject to the collection of a bank guarantee, which is in the amount of the mandatory investments for the first year⁶. Obviously, this "penalty" was not strong enough for the new media owners to decide to respect their legal obligations in order to reduce the cost of the program. To date, as far as we know, REM has not published a report on the extent to which the privatized media complied with the legal provision on continuity.⁷ . Anyway, this and next year will be five years since the privatization of certain media outlets, resulting in the annulment of this already weak legal obligation, so we can expect to witness in 2020 an additional reduction in the quantity and thus the quality of minority information in the country.

As for minority media content (and editorial teams) on public service broadcasters (RTS and RTV), it can be said that two completely different practices exist on RTS and on RTV. While Radio and Television of Vojvodina has a very rich and diverse program in minority languages, RTS does not comply with its legal obligations and does not have, at least not to the appropriate extent, news programmes and other contents of public interest, or program units in the national minority languages, and that is an issue that media experts have pointed out for long time. Minority media content and the editorial teams in public service broadcasters share with majority programs the independence risk, which is partly a consequence of the way RTS and RTV are financed (they have

⁴"Multilingual media - three years after privatization", Journalists' Association of Serbia, December 2018.

⁵The Law on Public Information and Media, to be discussed later, obliged the new owners to enable continuity in the production of media content of public interest, including the continuity of maintaining the share of informational, educational, scientific, cultural and artistic, children's, entertainment, sports and other program contents of public interest in certain languages of national minorities - within five years from the day of privatization.

⁶Protector of Citizens - Ombudsman of Serbia: Special report on information in the languages of national minorities after the privatization of the media, Belgrade 2016.

⁷According to the information we possess, REM reports annually to the Ministry of Economy about the compliance with the continuity in the production of media content of public interest, but the public does not have access to those reports.

mixed financing - from the collection of fees for public service broadcasting and from the budget). Dependence on budget funds and lack of stable and long-term predictable funding poses a major challenge to the independence of public service broadcasters. The inoperative Regulatory Authority for Electronic Media (REM) also strongly influences the way public service broadcasters function. In addition to these risks that they share with programs in the Serbian language, minority editorial teams in public service broadcasters are also concerned about the influence of National Minority Councils on editorial policy, which is realized through REM⁸, i.e. the legal right of national councils to give an opinion when electing the editor-in-chief of a minority language program⁹. Although their decision is not legally binding, in practice the opinion is considered a binding act.

Before the end of the introduction, we remind you of the question that the media experts have raised and publicly advocated on several occasions in the past years, and even decades: if we want to improve this area, it is necessary primarily to legally define in detail the concept of minority media, as well as multilingual media, but also to make a complete and unique list of these media outlets. This research is a small contribution to such an important goal, which will enable us to provide better information to citizens who consume minority media content, but also to prevent various types of inconsistencies that are visible, especially in the area of (co)financing. Although we aimed for the research and the accompanying analysis to reflect the real situation on the ground as much as possible, we are aware that there are errors or omissions in the document, especially in the list of media, therefore we ask a conscientious reader to point them out so we could make corrections.¹⁰

Finally, we would like to thank all those who shared with us the relevant data and their insights into current issues of public information in minority languages. They have greatly helped to make this report more complete and of better quality, and to approach the thematic areas from different angles. Here, above all, we refer to directors and editors of minority language media, who have provided us with a wide range of information, including those relating to financial operations. We would also like to thank the media experts who commented on the report and suggested some amendments. We accepted their proposals with great pleasure, since they were of exceptional quality.

⁸ According to the Law on Electronic Media, National Minority Councils propose one of the nine members of the Council of the Regulatory Authority for Electronic Media.

⁹ The Law on Public Service Broadcasters obliges the Director General to obtain the opinion of the National Minority Council on candidates for the editor-in-chief of the minority language program before submitting a proposal for his/her appointment to the Management Board.

¹⁰ Please point out omissions and mistakes by sending an e-mail to the author's e-mail address: nedim.sejdinovic@gmail.com

Unlike media directors and editors, as well as media experts, most National Minority Councils, despite repeated requests, did not provide us with the necessary information and comments on the report. Namely, we were very willing to incorporate their views about the problems and achievements of information in the languages of national minorities, as well as comments on the observed influence of minority political elites on public information in their languages. On the other hand, we would like to express our gratitude to the National Council of the Ruthenian National Minority, which demonstrates great readiness to cooperate with the professional public in order to improve the quality of information in the Ruthenian language. Namely, this Council, together with the representatives of the professional public and journalists, drafted and adopted documents defining mechanisms, procedures and rules that provide higher professional standards and protection of editorial policy in the media which (indirectly) this National Council is the founder of. This will be discussed later.

SOCIO-POLITICAL CONTEXT IN WHICH MINORITY MEDIA OPERATE

The Republic of Serbia is a multi-ethnic and multi-confessional state in which, beside Serbs, numerous national minorities live. According to the available data, as many as 21 minorities account for more than two thousand people. The areas of AP Vojvodina, as well as the south of Serbia, are particularly ethnically heterogeneous, although, primarily in the northern province, the number of minorities is decreasing from census to census. Some of the minorities in Serbia have a high degree of concentration, thus they represent a majority in some local self-governments. Hungarians are the majority in eight local self-governments, Bosniaks in three, Albanians, Bulgarians and Slovaks in two¹¹. Apart from the headcount, minorities also differ in the degree of equivalence of national affiliation and minority language, sense of community and mutual solidarity, political organization and political influence, age of the population, education, perception of the majority's attitude towards the minority, whether or not they have countries of origin, and informally, according to the degree of realization of minority rights, they can be divided into traditional minorities, new minorities and emerging minorities.¹² They certainly differ in terms of tradition, quantity and quality of public information in their mother tongue, therefore - according to this research - we see that out of 21 minorities, 15 have media in their languages. As expected, the Hungarian national minority has the largest number of media outlets and media content in its language, which is a consequence not only of the fact that it is the largest minority with a long tradition of existence in this area, but also of the fact that its country of origin, Hungary, has programs that support the Hungarian minority in Vojvodina in various areas, including the sphere of public information.

Minority rights in this area imply the right to information in the mother tongue, freedom of expression in minority languages, adequate funding of media content in minority languages, respect for the values of a multicultural and inter-cultural society and political and media pluralism. According to the valid legal framework, information in the languages of national minorities in Serbia takes place through three models¹³. The first model is represented by public media broadcasters (RTS and RTV), the second are media outlets founded by National Minority Councils (indirectly, through institutions, companies or associations they establish to exercise the right to public information in the language of a national minority), and the third are private media outlets (including the civil society media, as well

¹¹The analysis focused on the territory of Serbia without Kosovo.

¹²"Information in the languages of national minorities - recommendations for practical policies", Center for Civil Society Development, Zrenjanin 2017.

¹³ Žužana Serenčes: "Minority information - under the radar", Independent Association of Journalists of Vojvodina, Novi Sad, 2018.

as media outlets that were public companies until their privatization¹⁴). In each of these models, there are issues related to the law (funding, among other things) and accountability, media pluralism, accurate and objective information, independent editorial policy and transparency of work, all due to inadequate laws and by-laws, but also the lack of self-regulatory mechanisms.

When we talk about public media broadcasters and information in the national minority languages, we have already mentioned that the problem that minority programs and editorial teams share with the majority ones is - evident political influence on the work of public media broadcasters, which is inter alia due to inefficiency of REM, but also the manner of public media broadcasters financing. We emphasize that there is a huge difference in the practice of information provision in the national minority languages between the two public broadcasters, Radio and Television of Serbia (RTS) and Radio and Television of Vojvodina (RTV). While RTV broadcasts programs in as many as sixteen languages¹⁵, RTS - except on a symbolic level and regardless of the needs of citizens - does not produce any minority program, which endangers "non-Vojvodina" minorities such as Albanians, Bosniaks, Vlachs and Roma. Beside the mentioned general and very serious problems with the independence of public media broadcasters, the influence of national councils on the editorial and staffing policy of minority editorial teams, which mainly function as separate entities within RTV, was also noted. We should add to this the problem of communication between minority and majority editorial teams, as well as the communication among individual minority editorial teams - it is at a very low level. Of course, a big problem that minority editorial teams in public media broadcasters face is the lack of personnel. Recovery of the personnel structure has been hampered by the current Ban on Public Sector Employment, as well as by the large outflow of young members of minority communities to their countries of origin or generally abroad.

Certain National Minority Councils, such as the Albanian one, will point out that the fact that RTS does not broadcast in Albanian is a "discriminatory act".¹⁶ . Meanwhile, in October last year, RTS started broadcasting Albanian-language news "Lajmet", as an actual step forward, but media experts point out that the way the programme is produced is inconsistent with the requirements of the Albanian national community in Serbia for the representation of programs in their language on the public media broadcaster which they also pay for. They even warn that the language of this programme is not in

¹⁴ We still have media that, contrary to the law, are owned by the state. Due to the unsuccessful privatization, the state still manages Tanjug and Radio and Television Kragujevac.

¹⁵ RTV broadcasts programs in 14 minority languages, some as program units on a fairly large scale, and some on a symbolic level with the help of independent productions. Apart from minority languages, the program is broadcast in Serbian and English.

¹⁶ <http://www.ndnv.org/wp-content/uploads/2018/02/Treci-izvestajFINAL.pdf>

line with the Albanian language standards. RTS broadcasts a series "Citizen" twice a week on its channels, which consists of collage-type shows, recorded throughout Serbia, where members of national minorities live. The shows are in Serbian and in minority languages with appropriate translation.

As for the national councils' media, their financing in the field of information, which currently takes place through the Ministry of Public Administration and Local Self-Government of the Republic of Serbia (Office for Human and Minority Rights) and the Secretariat for Culture and Public Information of AP Vojvodina, has not been legally adequately resolved. Both mechanisms function insufficiently well, and the provincial financing system is especially problematic as it is defined only by the interim provisions of the Law on Public Information and Media, as a temporary solution that should have lasted until the new Law on National Minority Councils was adopted. However, this issue has not been systematically resolved with the amendments to the 2018 Law on National Minority Councils, causing a certain legal vacuum that needs to be filled as soon as possible. Namely, the province allocates around 300 million dinars for the media that are (indirectly) founded by the national councils¹⁷ per year, which may be a good solution for the financial sustainability of these media outlets, but it is not in line with the spirit of the Law on Public Information and Media which stipulates that the public interest in the media is (co)financed in a transparent and non-discriminatory manner, through public tenders and with the existence of an expert commission. Currently the Province at its discretion, without clear criteria, allocates significant amounts of money to the national councils' media, without any public participation in that process. There is another difference in the allocation of public funds for financing the national councils' media: while the Province allocates funds directly to media publishers (institutions, companies or foundations established by National Minority Councils), the Republic refers money to national councils, which then transfer the funds to media outlets they are indirectly the founders of. This latter process also takes place without a clear insight into the spending of taxpayers' money.¹⁸ All in all, media publishers in central Serbia, whose indirect founders are National Minority Councils, receive much less money from the state than the media in AP Vojvodina. Also, national councils do not use, to large extent, the possibility to allocate funds through competitions to the media that are not (indirectly) founded by them, and in that way to encourage media pluralism in minority languages.

¹⁷ It should be noted that the Office for Human and Minority Rights of the Government of Serbia allocates a total of 245 million dinars for the operations of all national councils (21) (data for 2018).

¹⁸ "Minority media and National Minority Councils as (indirect) founders of minority media - negligent custodians of public money", BIRN, January 2020.

Regarding the (co)financing of minority media content at the local level, there is nowhere precise data on the amount of funds allocated for that purpose through the system of competitive co-financing. Unlike the Republic and the Province, local self-governments - even those in which a significant number of minority communities live - do not apply the legal possibility to announce an independent media competition for the content in the languages of national minorities. Therefore, it is unclear to what extent they comply with a stipulation of the Law on Local Self-Government, according to which they are obliged to take care of the exercise, protection and promotion of human and minority rights, gender equality, as well as public information in the municipality.¹⁹

It is clear that it is necessary to harmonize the umbrella media law, the Law on Public Information and Media, and the Law on National Minority Councils as soon as possible, while respecting the basic postulates of the media reform initiated in 2011. Namely, it is necessary that the process of financing the media (indirectly) founded by the national councils be made adequate, transparent, non-discriminatory, while providing conditions for the development of professionalism and independent editorial policy. Namely, on several occasions we have witnessed strong pressures on the editorial policy of these media by their founders, national councils (the Presburger case²⁰, the Mihok case²¹, the case of six dismissed Magyar Szo journalists ...), which confirm that this issue needs to be handled very seriously and resolved through legal mechanisms, but also through the introduction of self-regulatory mechanisms within the council.²² Recently, the internal code of ethics of the National Council of the Ruthenian National Minority and the newspaper publishing house Ruske Slovo, drafted by the representatives of the Independent Association of Journalists of Vojvodina, the Council, and that national community media, was compiled and presented. It sets up mechanisms, procedures and rules enabling improvement of the quality of information and media freedoms in the media which this national council is (indirectly) the founder of. This model may be applicable in other national communities, but this does not mean that amendments to the law that will provide ways to protect the editorial policy of these media outlets from minority political elites are unnecessary.

In the first Media Strategy, the one covering the period from 2011 to 2016, as well as in the media laws from 2014, the issue of public information in the languages of national minorities - it seems - was not adequately addressed. It is strange, considering the fact that the rights of national minorities to

¹⁹ Law on Local Self - Government ("Official Gazette of RS", No. 129/2007, 83/2014 - state law, 101/2016 - state law and 47/2018)

²⁰ <http://www.ndnv.org/2011/06/24/presburger-je-smenjjen/>

²¹ http://www.rtv.rs/sr_lat/vojvodina/backa/smenjen-direktor-panon-rtv-rudolf-mihok_274026.html

²² Nedim Sejdinović: "Information in minority languages in the context of drafting a new Strategy for the Development of the Public Information System in Serbia (until 2023)", NDNV, Novi Sad 2017.

information in their own language halted the previous privatization of the media, which was supposed to be completed (according to the laws from 2002 and 2003) in 2007. During the public debate, the concept of the right of minorities to information in their own language was discussed, with a special focus on funding, while media freedoms, media pluralism and mechanisms for development and protection of media professionalism and independent editorial policy of these media were in the background, as well as the transparency of work. It can be said that the process of implementing media laws from 2014, which suffer from the same shortcomings as the strategic document, provided additional, strong political influence on the media founded (indirectly) by National Minority Councils, while the rest of the minority media scene was left to dwell in complete confusion.

We have already mentioned that 43 multilingual media outlets were subject to privatization, and that mechanisms were not provided to enable their adequate and long-term (co)financing, which is why a large number of privatized media faced a very difficult situation, while a number of them ceased to exist²³. It can be said that the consequence of the application of these laws is an additional threat to pluralism in public information in the languages of national minorities. Given that the subject of privatization were numerous media outlets with the multilingual content, and which therefore represent an important element of interculturalism in the society, it is really surprising that the legislator, despite the demands of the professional public, has been persistently refusing to include interculturalism among the defined public interests in the field of public information. If interculturalism was recognized as a public interest (co)financed by the state, perhaps that would solve at least part of the problems related to the survival of multilingual media. When we talk about the need for greater representation of interculturalism in the media, this applies not only to the minority and multilingual but also to the majority media.

The new Media Strategy, adopted in January 2020, is an opportunity to correct these omissions. It contains solutions that would - through the development of an action plan and amendments to the law - improve the system of public information in the languages of national minorities. Interestingly, it is in the sphere of public information in the languages of national minorities that a "misunderstanding" occurred, between on the one hand, representatives of the Government of Serbia and national councils, and on the other, journalist and media associations that participated in the drafting of this document. A similar situation replicated from the period of adoption of the previous strategic document and the current media laws (2014), when solutions concerning the minority media scene were sought on the line of majority-minority political elite, without the involvement of the

²³ Ibid.

professional public. It turned out that the mechanisms envisaged for the development of public information in the languages of national minorities, especially those that provided media pluralism and protection of editorial policy of the media (indirectly) founded by the national councils, became at certain point unacceptable to the Serbian government and therefore removed from the text of the document without the knowledge of the representatives of the Working Group for the Media Strategy Development. After the protest of the Journalists' and Media Associations²⁴, but also by international organizations, the Working Group was reconvened and these mechanisms (related to reducing of influence of national councils on the media, which they indirectly founded) reclaimed their place in the document. It should be noted that also political representatives of national minorities, and certain home countries of national minorities as well, are against the precise legal regulation of the relations between the National Minority Councils and the media which they (indirectly) founded. On the other hand, pressures on the editorial policy of these media outlets are very frequent. The most current one in a series of such examples is the pressure on the Hlas ludu editorial office²⁵, a newspaper founded (indirectly) by the National Council of the Slovak National Minority.

Another matter was raised during the preparation of this document²⁶ which indicates that the relations between the National Minority Councils and the publishers of their media need to be clearly defined by the law, with the introduction of mechanisms for the protection of the autonomy and editorial policy of these media outlets. Namely, in mid-February, six of the nine members of the Management Board of the Libertatea Publishing House, which publishes the weekly of the same name, were dismissed during a telephone session of the founder - the National Council of the Romanian National Minority - without explanation, and six new ones were appointed. The editors of "Libertatea" believe that this act is actually an introduction into the dismissal of the editor-in-chief and a change in the editorial policy of the newspaper, and that it was prolonged due to the state of emergency and events related to the Corona virus pandemic.

²⁴ <http://www.nuns.rs/info/statements/43113/medijska-koalicija-neprihvatljive-izmene-nacrta-medijske-strategije-.html>

²⁵ <https://www.danas.rs/drustvo/uns-podraska-redakciji-hlas-ljudu/>

²⁶ <https://www.cenzolovka.rs/pritisci-i-napadi/politicki-pritisci-na-nedeljnik-libertatea-smene-na-hitno-sazvanoj-telefonskoj-sednici/>

LEGAL FRAMEWORK

Structurally, the rights of minority communities, including the right to information in the languages of national minorities - are prominent in a number of domestic legislative documents, from the Constitution of Serbia, and the laws, to the by-laws. In addition, Serbia is a signatory to a number of international acts, ratified by the state parliament, in which minority rights are thoroughly elaborated in the context of the overall human rights corpus. In the process of the European Union accession, the exercise of minority rights is also particularly emphasized: they are formulated in Chapter 23 (Judiciary and Fundamental Rights), and a special [Action Plan for Exercising the Rights of National Minorities](#) has been drafted, which contains a separate section dedicated to freedom of expression and the position of the media in the languages of national minorities. The Government of Serbia adopted this strategic document on 3 April 2016, and it practically represents an integral part of the Action Plan for Chapter 23 (Judiciary and Fundamental Rights), and therefore the periodic reports on the implementation of the Action Plan for exercising the rights of national minorities, in the part in which they overlap, are included in the reporting on the implementation of the Action Plan for Chapter 23.²⁷

The attitude towards information in the languages of national minorities in this document is typical for the overall attitude that the state of Serbia, but also the home countries of national minorities have towards information in the languages of minorities: attention is paid to the rights and financial sustainability of the media in the languages of national minorities, and much less attention is paid to freedom of expression in the languages of national minorities, quality of media and media content, media pluralism in the languages of national minorities, and obligations of National Minority Councils in exercising the right to truly, timely, credibly and fully inform citizens.

The umbrella law that defines the field of public information in the state of Serbia, the Law on Public Information and Media²⁸ (ZJIM) from 2014 - enables National Minority Councils to establish institutions and companies in order to exercise the right to public information in the language of a national minority, i.e. foundations in order to achieve the objective of improving public information in minority languages that benefits all, in accordance with law. In this way, minority language media are exempt from the rule that the state, at any level, cannot be - either directly or indirectly - the founder of the media. In addition, the media indirectly founded by national councils are not subject

²⁷ Independent Association of Journalists of Vojvodina (NDNV), "Information in the languages of national minorities - on a side-track", Novi Sad, October 2017.

²⁸ Law on Public Information and Media (Official Gazette of RS, No. 83/2014, 58/2015 and 12/2016 Article 16, paragraph 1, item 3)

to the provision referring to the ban on financing from public revenues²⁹. Article 143 of the ZJIM states that the financing of media founded by national councils is regulated by a special law regulating the status of National Minority Councils. Although this area, which will be discussed later, is not properly defined, it should be said that the media founded (indirectly) by national councils are largely financed from public funds. In almost all cases, more than 2/3 of the total revenue comes from the state. While the media of the national councils on the territory of Vojvodina are mostly financed from the budget of the autonomous province³⁰, the media of the national councils on the territory of central Serbia are financed from the budget of the republic, more precisely from the budget funds of the Ministry of State Administration and Local Self-Government, exactly the Office for Human and Minority Rights. As already pointed out, the Province pays the money directly to the media publishers, while the Office transfers the funds to the national councils, and they then finance the media that they are indirectly the founders of.

According to the ZJIM, the director of the institution, company, or the manager of the foundation, and the editor-in-chief of the media (indirectly) founded by the National Minority Council - are appointed and relieved of duty by the management body, for a four-year period, following a public competition. According to this law, two thirds of the members of the management body of the institution, company, or foundation, which are the founders of the media, are independent members. The law defines that independent members are persons who have not held public office for at least three years prior to their appointment as a member of the management board of the publisher, in terms of regulations governing the prevention of conflict of interest in the exercise of public office.

Article 13 of the ZJIM states that - in order to enable national minorities to exercise their right to be informed in their own language and to foster their own culture and identity - the Republic of Serbia, the Autonomous Province or Local Self-Government Unit provide part of the funds, through co-financing or otherwise, for the operation of the media that publish information in minority languages. Minority information is also present in the legal definition of public interest in the field of public information, namely in two points. (Also, according to the ZJIM, the realization of public interest in the media is financed through competitive co-financing.) The public interest implies authentic,

²⁹ The ban on financing from public revenues does not refer to competitive co-financing of the public interest in the field of public information. However, media co-founded indirectly by national councils are not eligible for funding through media content competitions, as other funding mechanisms are provided.

³⁰ The practice of the Provincial Secretariat for Culture, Information and Relations with Religious Communities is to allocate funds directly to media publishers, unlike the practice of the Office for Human and Minority Rights, which allocates funds to national councils and they forward the money to media publishers that they are the founders of.

unbiased, timely and full information in the mother tongue of the citizens of the Republic of Serbia belonging to national minorities, as well as maintaining cultural identity of the Serbian people and national minorities living on the territory of the Republic of Serbia.

Based on the Law on National Minority Councils³¹, national councils are organizations entrusted with certain public powers to participate in decision-making or to decide independently on certain issues in the field of culture, education, information provision and official use of language and script. The information provision actually implies public information in minority languages. According to this law, and in accordance with the ZJIM, national councils are allowed to establish institutions and companies in order to exercise their right to public information in the minority language, or foundations in order to achieve the objective of improving public information in minority languages that benefits all, in accordance with the law.

Article 116, paragraph 1 of this Law stipulates that the funding of the institutions and other organizations whose founding rights have been partially or fully assigned to national councils shall be carried out from the same sources and on the basis of the same norms that those institutions or organizations used before the assignment of founding rights to national councils. The law essentially refers to the agreement on the assignment of founding rights to national councils, which regulates the financial liabilities of the previous founder. This provision primarily refers to the agreement on the assignment of the founding rights of the media in minority languages concluded between the Assembly of Vojvodina (previous founder) and the National Minority Councils in 2004. Namely, during the assignment of founding rights to National Minority Councils³², the Assembly of Vojvodina guaranteed future funding for minority media at least at the same level as at that time. This article stipulates that national councils may provide additional funds for the operation and activities of institutions or other organizations whose founding rights have been assigned to them.

According to this law, national councils have the right, but not the obligation, to finance media that are not (indirectly) founded by them, as well as their media content. Article 113, paragraph 2, item 1 stipulates that national councils finance or co-finance programs and projects in the field of information from the regular operation funds.

³¹ Law on National Minority Councils (Official Gazette of RS, No. 72/2009, 20/2011-14- decision of the AC 55/2014 and 47/2018)

³² See more at: <http://www.mc.rs/osnivacka-prava-nad-listovima-manjina-preneta-nacionalnim-savetima.50.html?eventId=14668>

The existing regulations essentially leave a huge empty space in defining the rights, positions and liabilities of the media that are (indirectly) founded by the national councils, as well as of the national councils themselves. There are no elaborated mechanisms for stable, continuous, transparent and predictable financing of minority media, and there are no anticipated mechanisms for protecting the independence of editorial policy of the media (indirectly) founded by national councils, let alone mechanisms for guaranteeing media pluralism in the field of minority information. Despite the provision of the ZJIM from 2014, which states that the financing of media founded by National Minority Councils will be regulated by a "special law regulating the status of National Minority Councils", it is clear that it was overlooked when amending the Law on National Minority Councils. Namely, only provisions related to the financing of the overall activities of national councils were defined, and in absence of clear legal norms and explicit definitions, it is clear that this law did not properly respond to the interim provision of the ZJIM or the expectations of media experts to finally have this area regulated.

Things are even worse when it comes to the responsibility of the minority media scene representatives. The legislative wording on National Minority Councils, in the provisions about their founding rights in the field of information, does not have a single word about the principles of their liability in this field. Even though the experience and testimonies prove that a particularly big problem with media in which national councils (at least indirectly) have the founders' role is related to the issue of editorial autonomy of these media, and the influence of minority national councils, or political parties that play a dominant role within national councils, on the editorial policy of these media outlets.³³

Law on Public Service Broadcasting³⁴ mentions national minorities already in article three, which states that the main activity of the public service broadcaster is the realization of the public interest defined by the law, which, among other things, entails "preservation of the national identity of the Serbian people and national minorities". Then, Article 10 specifies the public interest realized by the public service broadcaster, and states, among other things, that it represents the fulfilment of informational needs of all parts of the society "without any discrimination", including minorities, as well as the fulfilment of needs that preserve "cultural identity" of the majority and minority peoples in the territory of Serbia. The law obliges public service broadcasters to ensure that national minorities have access to "certain programming units in their mother tongue and script." In that sense, it can be

³³ Žužana Serenčević: "Minority information - under the radar", Independent Association of Journalists of Vojvodina, Novi Sad, 2018.

³⁴ Law on Public Service Broadcasting ("Official Gazette of RS", No. 83/2014, 103/2015 and 108/2016)

freely said that the Radio and Television of Serbia does not respect its legal obligations, although some symbolic progress has been made in that sense³⁵. Article 23 of the Law contains a paragraph that obliges the Director General to obtain the opinion of the National Minority Council on candidates for the editor-in-chief of the minority language program, before submitting a proposal for his/her appointment to the Management Board. Minority language programs and editorial teams are not mentioned in other parts of this law.

³⁵ This refers to the introduction of the news program in the Albanian language "Lajmet" on RTS from October last year.

MINORITY MEDIA IN THE NEW MEDIA STRATEGY

New Media Strategy³⁶, adopted in January 2020, envisages various measures that can improve the minority language media scene, ensure adequate, predictable and continuous (co)financing of minority media, i.e. media content in minority languages, as well as influence their professionalization. The question remains, of course, whether there will be a political will to transform guidance from the Strategy, which is an essentially non-binding document, into a legal norm. Also a question arises - in the context of the rule of law issues - to what extent legal norms, if in line with the Strategy, would be implemented in reality.

However, this document states that the position of National Minority Councils is defined so as to represent a "risk for achieving editorial independence of the media" whose publishers were founded by the National Minority Councils. It also raises the issues of financial sustainability of all minority language media, and "inadequate fulfilment of the obligation to provide information in minority languages by the public service broadcaster at the national level." The document states that the growth of revenues from the payment of distribution fees to public service broadcasters should enable technical improvements, but also "development of production in minority languages".

The document further states that the management boards of media publishers founded by National Minority Councils, as well as the editors-in-chief of those media, should be elected in such a way as to ensure "editorial independence of the media". Information in the languages of national minorities is also mentioned in the section entitled "Quality, plural and diverse media content meets the information needs of different social groups" and measures are stated that would contribute to increased objectivity and diversity of sources and media content in the minority media.

In addition to establishing the mentioned guarantees of editorial independence of the media outlets through mechanisms of protection of editorial policy against the influence of founders and "sanctions for acting contrary to these guarantees", this section also mentions the establishment of mechanisms by which management boards in the media whose publishers' founders are national councils - are obliged to consider, with due respect, "the opinion of the editorial team in the election and dismissal of editors-in-chief."

For the election of the management board members, similar criteria are envisaged to those provided for the election of the members of the REM Council: members should be professionals in the media field, with achieved "operational results or significant academic works in the media field". They should

³⁶ Strategy for the Development of the Public Information System in Serbia, January 2020

be media workers, economists with experience working with or in the media, telecommunications engineers with experience in media service technology, or have legal background with experience working in the media. The same conditions, according to the document, are required for the director, with the additional condition that he/she must "have experience in media management and proven operational success."

The Strategy also stipulates a measure that envisages "stable, transparent and non-discriminatory financing" of the media founded (indirectly) by national councils, "equally for all publishers in the territory of the Republic of Serbia." Then it mentions the encouragement of media not founded and co-founded by national councils in order to foster media pluralism, as well as the establishment of "clear criteria for allocating funds through competitive co-financing" concerning the production and distribution of media content in national minority languages.

Measures include maintaining and improving the quality of media content in the languages of national minorities on public service broadcasters, and introducing incentives for the establishment, development and functioning of civil society media in the languages of national minorities, as well as introducing incentives to support multilingual media and the "increase in professional staff to work in the media outlets in the languages of national minorities." The media problems of small national minorities that cannot exercise their right to information are also pointed out.

As far as public service broadcasting is concerned, this document states that it partially meets the goals set by the strategy, and that the areas in which the goals are not met are: the need to inform socially vulnerable groups, the need to inform in the languages of national minorities (referring to RTS), but also impartial and independent information (especially with regard to the news program). It also notes that the independence of the REM Council is crucial for the independence of public service broadcasters, including minority language programs. One of the reasons why RTS does not respect the obligations regarding the production of minority programs is, as this broadcaster claims, the lack of funds. The strategy believes that RTS could increase revenues from "distribution rights" and that part of these funds should be used, among other things, for "the development of production in minority languages."

Finally, the document recommends recognizing the production of media content that promotes interculturalism as a special segment of public interest.

MEDIA OUTLETS WITH MEDIA CONTENT IN MINORITY LANGUAGES³⁷³⁸

ALBANIAN LANGUAGE³⁹

No.	Primary language	Secondary language	Media type	Content type	Other languages
1	TV Bujanovac		Television	News and entertainment	Serbian
2	TV Preševo ⁴⁰		Television	News and entertainment	Serbian
3	TV Aldi Preševo		Television	News and entertainment	
4	TV Spek3 Bujanovac		Television	News and entertainment	
5	Radio Bujanovac		Radio	News and entertainment	Serbian
6		Radio Medveđa	Radio	News and entertainment	Serbian
7	Radio Preševo		Radio	News and entertainment	Serbian
8		TV Info plus Vranje	Cable TV	News and entertainment	Serbian
9	www.rtvpresheva.com		Web-portal	News and entertainment	
10	www.presheva.com		Web TV portal	News	Serbian
11	luginalajm.com		Web-portal	News	
12	spektri.tv		Web-portal	News	
13	preshevaobserver.com		Web-portal	News	
14	www.hanapress.net		Web-portal	News	
15	ministrialajmeve.com		Web-portal	News	
16	Perspektiva Bujanovac		Monthly	News	
17	Titulli.com		Web-portal	News	
18	Preshevajone.com		Web-portal	News	
19	Bujanoci.net		Web-portal	News	
20.	Folonline.com		Web-portal	News	
21.	Luginapress.com		Web-portal	News	
22.	Preshevapress.com		Web-portal	News	
23.	Presheva.al		Web-portal	News	
24.	Rtvaldi.com		Web-portal	News	
25.		Bujanovacke.co.rs	Web-portal	News	Serbian

³⁷ The following tables show the media founded (indirectly) by the National Minority Councils (marked in bold), as well as private and civil society media that provide information (also) in the minority language. Due to their specificity, the tables do not list minority programs of public service broadcasters, which are specified at the end of this chapter. Also, the table is prepared in such a way as to determine the actual situation on the ground, and not to reflect the existing registers, which are not up-to-date.

³⁸ Visual presentation of the data obtained by this research is available at: https://tixwitchy.shinyapps.io/minority_media/

³⁹ It was noticed that during the second half of 2019, several media outlets in the Albanian language were established in the area of Bujanovac and Preševo, with political and news content.

⁴⁰ Radio and Television Preševo is practically about to be shut down and is still owned by the local self-government, i.e. the public company. This broadcaster was burdened with litigation between employees regarding the ownership right. The litigation was resolved in July 2020. A long-time RTV Preševo journalist Ardita Saqipi became the owner of this media outlet. Currently, this local media outlet does not broadcast due to signal problems and lack of funds.

BOSNIAN LANGUAGE

No.	Primary language	Secondary language	Media type	Content type	Other languages
1	TV Novi Pazar		Television	News and entertainment	Serbian
2		TV Forum Prijepolje	Television	News	Serbian
3		TV Connect	Television	News and entertainment	Serbian
4	Sandžak TV, Novi Pazar		Television	News and entertainment	
5	Sandžačka TV mreža Tutin		Television	News and entertainment	
6	Radio Amaro Sjenica		Radio	News and entertainment	
7	Radio Novi Pazar		Radio	News and entertainment	Serbian
8		Radio Sto plus	Radio	News	Serbian
9	SANA , Novi Pazar		News agency	News	
10	sandzacke.rs		Web-portal	News	
11	sandzakpress.net		Web-portal	News	
12	sandzaknews.rs		Web-portal	News	
13	www.snews.rs		Web-portal	News	
14	a1tv.net		Web-portal	News	
15		Varoške novine, Nova Varoš	Multi-weekly	News	Serbian
16		Polimlje, Prijepolje	Multi-weekly	News	Serbian
17	Glas Islama		Biweekly	News and religion	
18	RefRef radio		Radio	News and entertainment	

BULGARIAN LANGUAGE

No.	Primary language	Secondary language	Media type	Content type	Other languages
1	TV Caribrod, Dimitrovgrad		Television	News and entertainment	Serbian
2		TV Info plus Vranje	Cable TV	News and entertainment	Serbian
3		Niška televizija NTV	Television	News and entertainment	Serbian
4	Radio Caribrod, Dimitrovgrad		Radio	News and entertainment	Serbian
5		Gold Radio, Surdulica	Radio	News and entertainment	Serbian
6	Radio Bosilegrad⁴¹		Radio	News and entertainment	
7	Far.rs		Web-portal	News	Serbian
8	tvinfobosilegrad.co.rs		Web-portal	News	Serbian
9		rtcaribrod.rs	Web-portal ⁴²	News	Serbian
10	www.glaspress.rs		Web-portal	News	Serbian
11	Vizija, Dimitrovgrad		Monthly	News	
12	Novo Bratstvo		Biweekly	News	

⁴¹ The media outlets that are (indirectly) founded by the National Minority Councils are marked in bold.

⁴² Multimedia portal RTV Caribrod.

BUNJEVAC

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		TV Subotica	Cable TV	News	Serbian, Hungarian, Croatian
2	Bunjevačke novine		Multi-weekly	News	
3	Bunjevački radio		Web-radio	News and entertainment	
4	Bocko		Monthly	Youth	

VLACH

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		TV Bor	Television	News and entertainment	Serbian, Romanian
2		TV Mlava	Television	News and entertainment	Serbian
3		TV 1 Majdanpek	Television	News and entertainment	Serbian
4		TV F Zaječar	Television	News and entertainment	Serbian
5		MIG radio, Svilajnac	Radio	News and entertainment	Serbian
6		Radio Bor	Radio	News and entertainment	Serbian
7		Radio Mlava	Radio	News and entertainment	Serbian
8		Radio F Zaječar	Radio	News and entertainment	Serbian

GERMAN

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		Naxi radio Apatin	Radio	News	Serbian, Hungarian, Romani, Croatian
2		Kula Q	Cable TV	News	Serbian, Hungarian, Ruthenian, Slovak, Ukrainian

HUNGARIAN

No.	Primary language	Secondary language	Media type	Content type	Other languages
1	TV Panon		Television	News	
2		TV YU ECO, Subotica	Television	News and entertainment	Serbian, Croatian
3		TV Santos	Television	News and entertainment	Serbian
4		TV OK, Kovačica	Television	News	Serbian, Slovak
5		Novosadska TV	Television	News	Serbian, Slovak
6		TV Pančevo	Television	News and entertainment	Serbian, Romani, Romanian, Slovak, Macedonian
7		TV Rubin, Kikinda	Television	News and entertainment	Serbian

8		TV Lav, Vršac	Television	News and entertainment	Serbian, Romanian
9		TV Subotica	Cable TV	News	Serbian, Bunjevac, Croatian
10	TV Mozaik		Cable TV	News	
11		TV Bečej	Cable TV	News	Serbian
12	TV Tiszapart		Cable TV	News and entertainment	
13	Radio Panon		Radio	News and entertainment	
14	Subotički mađarski radio		Radio	News and entertainment	
15	Radio Ada		Radio	News and entertainment	Serbian
16		Radio Trend, Bačka Topola	Radio	News and entertainment	Serbian, Slovak
17		Radio Bus, Kovin	Radio	News	Serbian, Romanian
18		Radio YU ECO, Subotica	Radio	News and entertainment	Serbian, Croatian
19		Radio Subotica	Radio	News	Serbian, Croatian
20		Radio Inđija	Radio	News	Serbian, Romani, Romanian, Ukrainian, Croatian
21		Radio Kovačica	Radio	News	Serbian, Romanian, Slovak
22		Radio Odžaci	Radio	News	Serbian, Romani, Slovak
23		Radio Srbobran	Radio	News	Serbian, Romani
24		Radio regije, Bačka Topola	Radio	News and entertainment	Serbian, Ruthenian, Slovak
25		Radio Marija	Radio	Religious	Croatian, Slovak, German, Ruthenian, Ukrainian
26		Radio Fox, Bečej	Radio	News and entertainment	Serbian
27		Radio Breg, Titel	Radio	News	Serbian, Romani
28		Naxi radio Apatin	Radio	News	Serbian, Romani, Hungarian, German
29		Radio Impuls, Bačka Palanka	Radio	News	Serbian, Slovak, Romanian
30		Q radio, Kula	Radio	News	Serbian, Ruthenian, Slovak, Ukrainian
31		Radio Pančevo	Radio	News	Serbian, Romanian, Slovak
32		Naxi Active Radio Bečej	Radio	News and entertainment	Serbian
33		Radio Bela Crkva	Radio	News	Serbian, Romani, Romanian, Czech
34		Radio Naxi Max, Novi Kneževac	Radio	News and entertainment	Serbian
35	VajdaságMa		Web-portal	News	
36	Szabad Magyar Szó		Web-portal	News	Serbian
37	kanizsaiujsag.rs		Web-portal	News and entertainment	Serbian
38		Autonomija	Web-portal	News	Serbian
39		q-media.rs, Kula	Web-portal	News	Serbian, Ruthenian
40	Magyar Szó ⁴³		Daily newspaper	News	
41	Képes Ifjúság		Biweekly	Youth	
42	Jó Pajtás		Biweekly	Children	

⁴³ The online edition has sections in Serbian and English.

43	HÉT NAP		Weekly	News and family	
44	Családi Kör		Weekly	News and family	
45	Temerini Újság		Biweekly	News and family	
46		Bečejski mozaik	Biweekly	News	Serbian
47		Bečejski dani	Biweekly	News	Serbian
48		Vršачka kula	Biweekly	News and advertising	Serbian
49	Szenttamas.rs		Web-portal	News	
50	Szo-beszed.org		Web-portal	News	

MACEDONIAN

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		NTV, Niš	Television	News and entertainment	Serbian, Bulgarian
2		TV Fokus, Vranje	Television	News and entertainment	Serbian, Romani
3		TV Pančevo	Television	News and entertainment	Serbian, Hungarian, Romani, Romanian, Slovak
4	www.makinfo.rs		Web-portal	News	
5	Македонска виделина		Monthly	News	
6	Суница		Multi-monthly	For youth	

ROMANI

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		TV Bor	Television	News and entertainment	Serbian, Vlach, Romanian
2		TV Šabac	Television	News and entertainment	Serbian
3		TV Pančevo	Television	News and entertainment	Serbian
4		TV Kruševac	Television	News	Serbian
5		TV Požega	Television	News and entertainment	Serbian
6		TV Trstenik	Television	News	Serbian
7		TV Mag, Obrenovac	Television	News and entertainment	Serbian
8		TV Banat, Vršac	Television	News	Serbian, Romanian
9		TV Leskovac	Television	News	Serbian
10		Radio Bus, Kovin	Radio	News and entertainment	Serbian, Hungarian
11		Radio Srbobran	Radio	News	Serbian, Hungarian
12		Radio Bela Crkva	Radio	News and entertainment	Serbian, Hungarian, Romanian, Czech
13		Radio Nišava	Radio	News and entertainment	Serbian
14		Radio Help, Mladenovac	Radio	News	Serbian
15	Radio Rom Obrenovac		Radio	News and entertainment	Serbian
16		Radio Indija	Radio	News	Serbian, Hungarian, Romanian, Ukrainian, Croatian

17		Radio Kruševac	Radio	News and entertainment	Serbian
18		Radio Barajevo	Radio	News	Serbian
19		Gold Radio, Surdulica	Radio	News and entertainment	Serbian, Bulgarian
20		Tempo naxi radio, Zaječar	Radio	News and entertainment	Serbian
21		Radio Bujanovac	Radio	News	Albanian, Serbian
22		Radio Breg, Titel	Radio	News and entertainment	Serbian, Hungarian
23		Naxi radio Apatin	Radio	News	Serbian, Hungarian, German, Croatian
24		Radio Han, Vladičin Han	Radio	News	Serbian
25	Čirkljori		Monthly	For children	Serbian
26		Radio Odžaci	Radio	News	Serbian, Hungarian, Slovak

ROMANIAN

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		TV Banat, Vršac			Serbian, Romani
2		TV OK, Kovačica			Serbian, Hungarian
3		TV Bor			Serbian, Vlach
4		TV Pančevo			Serbian, Hungarian, Romani, Slovak, Macedonian
5		TV Lav, Vršac			Serbian, Hungarian
6		Radio Bus, Kovin			Serbian, Hungarian
7		Radio Inđija			Serbian, Hungarian, Romani, Ukrainian, Croatian
8		Radio Kovačica			Serbian, Slovak, Hungarian
9		Radio Bela Crkva			Serbian, Hungarian, Romani, Czech
10		Radio Far, Alibunar	Radio	News	Serbian, Slovak
11		Radio Pančevo	Radio		Serbian, Hungarian, Slovak
12	Libertatea		Weekly	News	
13	Mucuria copiilor		Monthly	Children	
14	Tineretea		Monthly	Youth	
15	Lumina		Multi-monthly	Culture	

RUTHENIAN

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		Radio Šid	Radio	News and entertainment	Serbian, Slovak
2		Radio Marija	Radio	Religious	Croatian, Hungarian, Slovak, German, Ukrainian
3		Radio Regije, Bačka Topola	Radio	News	Serbian
4		Radio Bačka, Bač	Radio	News and entertainment	Serbian, Slovak, Croatian

5		Q radio, Kula	Radio	News	Serbian, Hungarian, Slovak, Ukrainian
6	Ruske slovo		Weekly	News and family	
7	Rutenpress		News agency	News	
8	Mak		Monthly	Youth	
9	Zahratka		Monthly	Children	

SLOVAK

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		Novosadska TV	Television	News	Serbian, Hungarian
2	TV OK, Kovačica		Television	News and entertainment	Serbian, Hungarian
3		TV Pančevo	Television	News	Serbian, Hungarian, Romanian, Slovak, Macedonian
4		Radio Trend, Bačka Topola	Radio	News and entertainment	Serbian, Hungarian
5	Radio Kovačica		Radio	News and entertainment	Serbian, Hungarian, Romanian
6		Radio Odžaci	Radio	News	Serbian, Hungarian, Romani,
7		Radio Šid	Radio	News	Serbian, Ruthenian
8		Radio Bačka, Bač	Radio	News	Serbian, Ruthenian
9		Radio Stara Pazova	Radio	News and entertainment	Serbian
10		Radio Marija	Radio	Religious	Croatian, Hungarian, German, Ruthenian, Ukrainian
11		Radio Regije, Bačka Topola	Radio	News	Serbian, Hungarian, Ruthenian
12		Q radio, Kula	Radio	News and entertainment	Serbian, Hungarian, Ruthenian, Ukrainian
13		Radio Pančevo	Radio	News	Serbian, Romanian, Hungarian
14	Radio Petrovec		Radio	News	
15	Hlas ludu		Weekly	News	
16	Vzlet		Monthly	Youth	
17	Zornjička		Monthly	For children	
18	Rovina		Monthly	Family	
19	Nový život		Monthly	Culture	
20	Národný kalendár		Yearly	News and entertainment	
21	www.storyteller.rs		Web-portal	News and entertainment	Serbian

UKRAINIAN

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		Radio Marija	Radio	Religious	Croatian, Hungarian, German, Ruthenian, Slovak
2		Radio Inđija	Radio	News and entertainment	Serbian, Hungarian, Romani, Romanian, Croatian
3		Q radio, Kula	Radio	News	Serbian, Hungarian, Slovak, Ukrainian

4	Ridne slovo		Monthly	News	
5	Solvejko		Monthly	For children	

CROATIAN

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		TV YU ECO, Subotica	Television		Serbian, Hungarian
2		TV Subotica	Cable TV		Serbian, Hungarian, Bunjevac
3	Radio Marija		Radio		Hungarian, German, Ruthenian, Slovak, Ukrainian
4		Naxi Radio Apatin	Radio		Serbian, Hungarian, Romani, German
5		Radio Subotica	Radio		Serbian, Hungarian
6		Radio Bačka, Bač	Radio		Serbian, Slovak, Ruthenian
7	Hrvatska riječ		Weekly	News	
8	Hrcko		Monthly	For children	
9	Kužiš?!		Monthly	Youth	
10	www.croinfo.rs		Web-portal	News	

CZECH

No.	Primary language	Secondary language	Media type	Content type	Other languages
1		Radio Bela Crkva	Radio	News	Serbian, Hungarian, Romani, Romanian
2	www.hlas.rs		Web-portal	News	Serbian

As for public service broadcasting, we have already said that, in the field of information in the languages of national minorities, there is a completely different practice between Radio and Television of Vojvodina and Radio and Television of Serbia. RTV broadcasts in as many as 16 languages, of which 14 are languages of national minorities (Hungarian, Slovak, Romanian, Ruthenian, Romani, Croatian, Macedonian, Ukrainian, Bunjevac, Albanian, Czech, Russian, Bulgarian, Montenegrin), while RTS has only one program (news) in Albanian (Lajmet), which was introduced relatively recently. RTS also has program units in Romani on radio and television, as well as a special Romani editorial team.

As for RTV, the second television channel of this public service broadcaster, which is dedicated to minority languages, broadcasts relatively diverse content in eleven languages (Hungarian, Slovak, Romanian, Ruthenian, Romani, Croatian, Macedonian, Ukrainian, Bunjevac, German and Serbian). The most represented media content is in Hungarian, whose program share is slightly less than a quarter of the content (23.33 percent), followed by Serbian (18.92 percent), and Romanian, Slovak, Ruthenian and Romani languages, which range between five and ten percent share. On the other hand, the program in the German language is at a symbolic 0.04 percent. Also, compared to 2014, there was a

decrease in the level of minority content on RTV's second channel in favour of programs in the Serbian language.⁴⁴

Radio Novi Sad Two is broadcast entirely in Hungarian, and the program is identically formatted as the program in Serbian (RNS1), which implies four different formats: morning, daily, evening and weekend. Radio Novi Sad Three is intended for other minority communities, and in addition to the mentioned minority languages, there is also, on a symbolic level, content in Albanian, Czech, Bulgarian, Russian and Montenegrin, which are mostly broadcast with the support of independent productions.

⁴⁴ For more data, see the reports of the Regulatory Authority for Electronic Media (REM) on the manners of complying with the legal programming obligations of the Public Service Broadcaster Radio and Television of Vojvodina, for 2014 and 2018.

ANALYSIS AND CONCLUSIONS

At first glance, a significant number and structure of media outlets that provide information (also) in the languages of national minorities, which we presented in the previous chapter, may seem satisfactory, but a few important things should be borne in mind before the final conclusion. We have already mentioned that during this year the five-year period from the privatization of a significant number of media outlets, listed in the previous tables, will expire, and thus the already fragile obligation of continuity of program content from the 2014 Law on Public Information and Media will cease to apply. This will - quite certainly - result in a reduction in the number of media outlets with a content in minority languages, i.e. certain multilingual media - due to the reduction in the cost of production - will become monolingual. Besides, a large number of listed media have a minority language content only on a symbolic scale - some radio stations broadcast only a few hours of minority programs during a month, and it seems that multilingualism is more necessary for their image, possible co-financing or participation in realization of certain projects, rather than for essentially fulfilling the needs of their recipients, i.e. citizens.

A bigger problem than the quantity of minority language media contents is their quality and diversity. When we talk about the political influences on the editorial policy of certain media, there has already been a lot of talk about the influence of minority political elites on the media whose publishers were founded by national councils. On this occasion, it should be noted that national councils have a significant role (proposing to the commissions which projects should be supported⁴⁵) in the competitive co-financing of the media, and thus they also can have an impact on the privately owned media, or the civil society media. However, we should not forget the fact that the new media owners in Serbia are representatives of the ruling majority political oligarchy, and that they openly influence the editorial policy of the media they manage. At the moment, the representatives of the minority and majority political elites in Serbia are in symbiosis, therefore the journalists in those media outlets - if we may say so - are exposed to double pressure from the same direction. It will be interesting, however, to see how the minority and multilingual media will behave if this symbiosis is broken.

Apart from the political, the diversity in terms of the type of media content is also questionable. As can be seen, news and entertaining contents largely dominate, while cultural, educational, scientific and other contents are only intended for public service broadcasters and media that are under the

⁴⁵ Previously, National Minority Councils, prior to the amendments to the Law on National Minority Councils, had the right to give only an opinion on media project proposals in the process of competitive co-financing of media in the languages of national minorities.

auspices of national councils. And when we analyse the news content, we will see that they are mostly composed of translated agency news, or translated news in the Serbian language produced by that media outlet. This applies to multilingual media. Therefore, there is a serious insufficiency of original content in media outlets that are not under the auspices of national councils or are not public service broadcasters.

When we talk about the structure of revenues, there is a very clear division between the media outlets founded by national councils and others (private and civil society media). Namely, the media of national councils earn more than 2/3 of their revenue from direct state aid, which they receive either from the Republic Office for Human and Minority Rights or from the Secretariat for Culture, Information and Relations with Religious Communities of AP Vojvodina. According to the survey we conducted for the needs of this research, other media outlets receive most money through competitive co-financing, and very few media outlets rely on individual income. Actually, the only media outlet with significant budget and which covers its work from its own revenues (newspaper sales and marketing) is the news and family magazine in Hungarian - "Családi Kör". In fact, this paper has an annual budget of more than 23 million dinars. Speaking of the media outlets that provide information in Hungarian, it should be noted that there is political pluralism in this scene, i.e. that there are some portals ("Szabad Magyar Szó", "VajdaságMa" and "Autonomija" in Hungarian) with, more or less pronounced, critical attitude towards the minority political elite, i.e. the Alliance of Vojvodina Hungarians (Savez vojvođanskih Mađara). It is also interesting that during 2019, in Bujanovac and Preševo, several news and political portals were launched, which are very active and have different political agendas.

The analysis will show that there are even 50 media outlets in the country that provide information in Hungarian, which is twice as many as the "second-ranked" minority - the Roma (26). It should be borne in mind that such a large number of media in the Hungarian language has to do not only with the number of inhabitants, but also with the funds that the Hungarian government allocates for projects, including media ones, in the territory of Serbia. As far as the Romani language is concerned, such a relatively large number of media has to do with the spread of this minority throughout Serbia, but we should not forget the fact that international organizations and donors have largely supported media projects in the Romani language in the previous period (especially as part of the Roma Decade). Otherwise, there is a very small number of media outlets whose primary language is Romani. We also note that there are several Roma websites that publish content in the Serbian language, as well as that there are a significant number of inactive websites in the Romani language which therefore did not qualify for this analysis. For example, one of the websites in the Romani language published last

content in 2014. On the other hand, Roma websites in Serbian language are strongly influenced by the political majority in Serbia.

It should be noted that the largest number of multilingual media outlets operate in Vojvodina, primarily radio stations, so in order to support minority information, media pluralism and interculturalism, perhaps a way should be found to stimulate these media outlets to improve the quality of their programs. Despite all the problems we have noted, radio media formats seem to be the most tenacious when it comes to multilingual information and it seems that it can largely - potentially - meet the information needs of citizens who follow the programs in minority languages. Sadly, however, some media failed to survive the media transition, such as Radio Kikinda, which was shut down after 24 years of existence and broadcast in four languages. It is interesting that currently an advertising content without any connection to this, once important, broadcaster appears on the domain of radiokikinda.rs.

The formation, or the trial work of two televisions in the area of Vojvodina, which are registered for broadcasting programs in several languages, is currently underway. One is called Vojvođanska Television (VTV), which is backed by Novosadska TV, and the other is Dunav Television, ratified by RTV Pančevo. We will see what are the goals of these media projects and the intentions of their owners. It should be said that both Novosadska TV and RTV Pančevo are under the strict control of the ruling Serbian Progressive Party.

One of the visible proofs that multilingual media in Serbia are in a bad state is their online presentations, which are very often not updated or are only in the majority language. For the most part, the presentations themselves are very anachronistic. The latest news on the website of the multilingual Radio Srbobran is the one from the beginning of 2018. Radio Subotica broadcasts in three languages, but their website has content exclusively in Serbian. The same is with RTV YU ECO, whose portal is also monolingual. Of course, we also have a large number of online media that declared content in minority languages when registering with the APR, and which are in reality absolutely monolingual. The review of the minority competition results clearly shows that there are televisions that broadcast programs in minority languages only if they receive funds for it through the competition. This practice should definitely be abandoned.

Significant differences in terms of annual budget and number of employees should also be noted among media outlets that have content (also) in the minority language. Here are just a few examples. Surely, the daily "Magyar Szó" has the largest number of employees - 195. According to the survey we

conducted, 53 of them are journalists and editors, and 142 are "others". This paper also has 153 independent associates and an annual budget of almost 400 million dinars. The weekly "Het Nap", which is also under the auspices of the National Council of the Hungarian National Minority, has 17 employees and 25 independent associates and a budget of 35.5 million dinars. On the other hand, for example, the portal "VajdaságMa" has only one employee and 26 independent associates and an annual budget of 4.5 million dinars, while the portal "Szabad Magyar Szó" has no permanent employees, but has 10 independent associates and an annual budget of 4 million dinars. The Romanian-language weekly "Libertatea", i.e. newspaper-publishing house of the same name, permanently employs 20 people, and has 11 independent associates and an annual budget of 43.5 million dinars, while NIU "Hrvatska riječ" (a weekly and two additional editions) has 15 employees and 65 independent associates, as well as a budget of 38.5 million dinars. On the other hand, Radio Šid, which broadcasts in three languages (Serbian, Slovak, Ruthenian), has 12 employees and 2 independent associates, while Naxi Max Radio from Novi Kneževci, which broadcasts in Serbian and Hungarian, has only two employees and one independent associate and an annual budget of one million dinars. It is an interesting fact that Radio Bosilegrad, which operates under the auspices of the National Council of the Bulgarian National Minority, has an annual budget of barely two million dinars, and permanently employs five people and has one independent associate.

We presented these data as an example of a significant diversity in the minority media scene in terms of capacities and scope of individual media outlets. They should be an incentive for legislators when passing new laws regulating the media scene to perform its in-depth analysis, but also to find mechanisms by which the minority media scene will be measured and monitored in the future in order to improve it. They also demonstrate that it is difficult to talk about media pluralism even in a situation when we have media outlets in a certain minority language that diverge from the government (this is far from being the case with all languages). Namely, when there is a dramatically large difference between the media outlets in terms of revenues generated from the state and the number of engaged associates, i.e. capacities and scope, it is difficult to talk about non-discriminatory (co)financing of minority media and media content. Also, we note dramatically large differences between the position of the media in the territory of AP Vojvodina and minority media in the rest of the country, which means that it would be necessary to level the conditions for their work, but in such a way that the exercised rights of minority communities in the province are not decreased.

To return to the beginning: if we want to encourage minority language media and multilingual media, it is necessary to clearly define them first, i.e. to create a register of minority and multilingual media in accordance with the definition. Also, it is necessary to provide certain incentives so that the number

of minority language media does not decrease in the coming period when the statutory clause on the continuity of the program content of privatized media expires.

Currently, it is clear that the laws and by-laws defining the field of public information in the languages of national minorities in Serbia and the role of national councils are inadequate and do not provide any guarantees for the accountability of the media founded (indirectly) by national councils, nor the mechanisms to enable accurate, unbiased, complete and timely information in the languages of national minorities, independent editorial policy of the media (indirectly) founded by the national councils, i.e. independence from funding sources, prohibition of any form of censorship and illegal influence on editorial work, application of internationally recognized norms and principles, or compliance with professional standards and codes.

Both the 2014 media laws and the 2018 amendments to the Law on National Minority Councils failed to provide mechanisms for stable, transparent, adequate and non-discriminatory funding of the media that are (indirectly) founded by the national councils, and which are exempt from general rules that apply to other media outlets in accordance with the Law on Public Information and Media. Given the fact that the national councils' media are put in the position of minority public service broadcasters, the opportunity was missed to provide, by amending this law, the mechanisms to protect editorial policy from the influence of founders, according to the logic required by legal definition of public service broadcasting. The opportunity to define more precisely the obligations of National Minority Councils in relation to media that they did not (indirectly) found was also missed, as well as to ensure overall transparency and introduce precise rules concerning the relations between national councils, media publishers and the media themselves, i.e. editorial teams.

The research shows that the media outlets (indirectly) founded by National Minority Councils are financed from public revenues in an extremely large percentage, which implies a huge responsibility, not only in terms of the control of the money spent but also evaluation and accessibility of the achieved results. It is also evident that almost all the money obtained from public revenues is spent on the production process itself, without investing the funds in development activities. Representatives of the media (indirectly) founded by national councils complain about the Ban on Public Sector Employment, which significantly hinders the employment of new / young media workers after the retirement of employees. This is a serious problem for minority media and their staff renewal.

It should be noted that media outlets that provide information in the languages of national minorities, which are not founded by national councils, operate under incomparably harder conditions, and are forced to rely for survival - in conditions of inadequate minority media market - on competitive co-financing or international donations, which are becoming increasingly rare. The state missed the opportunity to provide precise mechanisms and establish the obligation of competitive co-financing of the public interest in the field of minority information for media outlets that are not (indirectly) founded by national councils, putting these media outlets in additionally unequal position. Information in the languages of national minorities, except in the media of national councils and on public service broadcasters, is left at the mercy of the executive authorities and competition commissions, most of which are not experts in evaluating project proposals in minority languages.

It should be said that all media outlets providing information (also) in a minority language have a common problem - the lack of staff, especially among the younger generation. The brain drain, which affects the entire country and all national communities, is particularly pronounced in minority communities, especially those whose home countries are part of the European Union. This is a problem that - unless solutions are found and appropriate incentives are put in place - will further jeopardize the minority media scene. We believe that incentives can be realized not only through state funds and benefits, but also through cooperation with home countries, and also the European institutions. Besides, by rejuvenating staff and using new technological platforms, media outlets and media content in minority languages will draw closer to the younger audience, which - as some experts point out - currently receives very little information from existing minority and multilingual media.

Finally, let's turn to public service broadcasting. It is clear that RTS must reach the level of RTV when it comes to the production of media content in the languages of national minorities, in this case national minorities who mostly live in the territory of central Serbia. However, the news that RTV employs journalists and other media workers through various agencies, so to speak "on lease", and that many of them, due to lack of funds, lost their jobs, including staff from minority editorial teams, is disturbing. It is necessary to abandon this practice as soon as possible and find funds for regular employment of journalists and media workers on public service broadcasters, especially in minority editorial teams, which - as we have pointed out on several occasions - have a particularly big problem in staff renewal and formation of good quality journalists through practice.⁴⁶

⁴⁶ <https://www.021.rs/story/Novi-Sad/Vesti/250380/RTV-otpusta-200-radnika-drzava-ignorise-pozive-u-pomoc.html>

RECOMMENDATIONS

Legislation

- It is necessary that all participants in the Action Plan for Media Strategy drafting, i.e. creating new or amending existing media laws - approach the problem of information in the languages of national minorities with due care, respecting the rights of national communities, but also the concept of media freedoms and multicultural society. We pointed out that during the preparation and drafting of the set of media laws from 2014, insufficient attention was paid to providing information in the languages of national minorities, which caused numerous problems, and not only on the minority media scene.
- It is extremely important that the state, before drafting new media laws or amending existing ones, as well as before drafting laws that define the position of National Minority Councils, makes a thorough analysis of the minority media scene. It is necessary to establish precisely which of the minority and multilingual media exist in Serbia, what types, quantities and quality are the media contents they produce, how they are financed, with how many employees and how many independent associates, what are the technical and personnel capacities, and the like. This extensive but important research would indicate the real situation in this area, and it could result in a register of minority and multilingual media in Serbia, which would help to define adequate measures that would contribute to the improvement of this field.
- It is necessary for the state of Serbia, together with the National Minority Councils and the professional public, to make an effort and produce mechanisms that would support the survival of minority media content in the media privatized under the 2014 Law on Public Information and Media. This year marks the fifth anniversary of the privatization of the media, and expiry of the obligation of the new owners to - according to the ZJIM - maintain program continuity, which could result in a significant reduction of minority media content and multilingual media outlets in the coming period.

Incentives for minority media content

- It is necessary for the state, in accordance with the international acts to which it is a signatory, but also its own laws, to introduce incentives for media outlets that provide information (also) in minority languages (and which do not work under the auspices of public service broadcasters and national councils), so that citizens can exercise their right to accurate, timely, credible and complete information, and in order to provide media pluralism. Before that, it is necessary to precisely legally define what is a minority and what is a multilingual media outlet. This is very important due to the fact that some media outlets are multilingual - only on a symbolic level.
- Civil society media providing information in the languages of national minorities need special stimulation, in order to increase media pluralism.
- It is necessary to create mechanisms that will stimulate multilingual media, in order to increase the level of interculturalism in the media outlets and the society. Precisely because of the multilingual media and media content, it is very important to define interculturalism as a public interest to be co-financed through competitions. In that sense, interculturalism should be a feature not only of the minority but also of the majority media.
- The Government of Serbia and the competent ministry, possibly in cooperation with the home countries of national minorities, should consider providing incentive programs for radio media platforms that provide information (also) in minority languages. Since radio broadcasting is the cheapest, its stimulation can significantly improve the field of minority information and ensure media pluralism in minority languages. This analysis shows that radio is the toughest platform when it comes to information in minority languages. Multilingual radio stations can also be a guarantee of interculturalism. Although online media can also potentially be an adequate platform for information in minority languages, the fact is that the population structure of minority communities (a large percentage of the old and rural population) indicates that radio is more appropriate for this.
- The state should ensure through incentives that minority and multilingual media, including minority programs and editorial teams on public service broadcasters, employ a certain number of young people, and thus provide them with on-the-job training. National Minority Councils should also play an important role in this process. We pointed out that all media that provide information (also) in a minority language have serious problems with professional staff, especially the younger generations. The reasons are twofold: the first is the large outflow of young people, especially members of national minorities, to more developed countries, and the second is - very low incomes in the media.

- The state should provide incentives that will help modernize the minority and multilingual media, using new platforms, in order to reach to the younger audience.
- The state must provide mechanisms that will facilitate the employment of young staff in the minority editorial teams on the public service broadcasters, as well as in the media founded (indirectly) by National Minority Councils, given the current Ban on Public Sector Employment.
- A possibility should be considered for the state, as in the case of the Bulgarian national minority, to provide funds for one-off, but significant support for the development of media in the languages of national minorities. These funds could be used for infrastructure development, but also to increase the capacity of the media to collect funds for their operation from other sources as well.
- Other incentives for electronic media with minority language content should also be considered. (For example, in terms of eliminating or reducing costs, such as digital dividends, costs for SOKOJ (Serbian Music Author's Association), OFPS (Organization of Phonogram Producers of Serbia), etc.).

Competitive co-financing of media content in minority languages

- The state at all levels (especially local self-governments with mixed ethnic composition) should ensure that the commissions evaluating minority and multilingual projects, during the competitions for co-financing of the public interest in the field of public information, consist of competent and highly professional people. The findings of this research indicate that a large number of media outlets, especially multilingual ones, largely depend on competitive co-financing.
- It is necessary for the state at all levels to provide adequate funds for competitive co-financing of minority and multilingual media content, preferably in separate competitions, provided that good quality minority and multilingual projects should not be discriminated in "general" competitions for media content support.
- Local self-governments with significant number of members of minority communities should be obliged, in accordance with the Law on Public Information and Media and the Law on Local Self-Government, to announce separate competitions for co-financing media content in minority languages.

Media founded (indirectly) by the national councils

- The state should, in accordance with the adopted Media Strategy, by amending the current laws, not only the media ones, provide mechanisms for stable, transparent, adequate and non-discriminatory financing of the media outlets (indirectly) founded by national councils.
- It is necessary to harmonize the conditions for the work of the media that are (indirectly) founded by the national councils on the entire territory of Serbia, but in such a way as not to jeopardize the level of funding of the national councils' media operating on the territory of AP Vojvodina.
- Given that they are financed in a huge percentage from public revenues, amendments to the law should establish mechanisms for media publishers (indirectly) founded by the National Minority Councils to make their work fully transparent, i.e. to publish their reports to national councils and state bodies on their websites or otherwise, in a way that will enable not only control of spent money but also evaluation of achieved results.
- Funds received from public revenues by the national councils' media, as well as public service broadcasters, should be directed not only for employees' salaries, fees and production costs, but also for programs that would imply individual development and improvement of conditions for withdrawing funds from other, non-state funds.
- It is necessary for National Minority Councils (if not already) to adopt their own information development strategies as soon as possible, or to redefine existing ones in a way that will enable the improvement of minority information quality, respecting the principles of media freedom and media and political pluralism, and to increase the transparency of their work and the work of the media outlets which they (indirectly) founded.
- It is recommended that National Minority Councils - following the example of the National Council of the Ruthenian National Minority - with their internal acts provide mechanisms that will clearly define the relations between national councils, media publishers and media outlets (editorial teams), in order to exercise the rights of national minority members to accurate, unbiased, complete and timely information. These acts should prevent political influence on the media, censorship and self-censorship, and ensure compliance with professional standards and codes. In their provisions, these acts should also contain mechanisms for supervision over their application, implemented by representatives of journalists' and media associations, or civil society as well.
- It is recommended that National Minority Councils, in accordance with the Law on National Minority Councils, provide funds for media content / media outlets that they did not

(indirectly) found from their regular activities through a public competition, in order to promote media pluralism in minority languages.

- In line with the Media Strategy and good practice, national councils should provide mechanisms that will enable the media, which they (indirectly) founded, to consider with appreciation the opinion of the editorial team when electing and dismissing editors-in-chief.
- It is necessary to amend the law to define regulatory mechanisms and guarantees that will enable minority media founded (indirectly) by national councils to protect their editorial policy from the influence of the founders, as well as to provide sanctions in case of violation of these provisions.
- The new Law on National Minority Councils or amendments to the existing one, analogous to the statutory solution on public service broadcasting, should firmly specify the basic operating principles of the media outlets indirectly founded by national councils, which are financed from public funds. This includes defining a set of obligations of these media outlets in the pursuit of public interest, as well as the obligation of accurate, unbiased, complete and timely information, independent editorial policy and independence from funding sources, prohibition of any form of censorship and illicit influence on editorial work, application of internationally recognized norms and principles, i.e. compliance with professional standards and codes.
- The amendments to the law should contain mechanisms that would prevent the members of national councils to be members of the management body of the media publishers, of which they are the founders.

Financing media outlets of national councils in AP Vojvodina

- Funds allocated by the Provincial Secretariat for Culture, Information and Relations with Religious Communities to media publishers founded by National Minority Councils on the territory of AP Vojvodina should be allocated in accordance with the pre-defined, clear and transparent criteria, in a non-discriminatory manner.
- Reports submitted by media publishers to the Secretariat should be available on the Secretariat's website, and these reports should provide a complete insight into the spending of citizens' money. It is necessary that the reports contain the method of evaluating the implemented activities, so that all the interested parties can gain insight into their quality, achieved goals and results.

Self-regulation and education

- The Press Council should increase the capacities in the area of information in minority languages.
- Funds should be provided for exercising the right to information of the smallest national minorities that do not have media outlets in their own language. This problem can be solved by larger engagement of public service broadcasters and their cooperation with independent productions.
- It is necessary to envisage mechanisms that will enable the strengthening and education of minority journalists for analytical-critical or investigative journalism. Competent state bodies in charge of information and the rights of national communities at all levels can cooperate in this endeavour, along with public service broadcasters and National Minority Councils, both as important actors.

Public service broadcasting and information in minority languages

- It is necessary for RTS to start fulfilling its legal obligation related to information in minority languages ("non-Vojvodina" minorities). Namely, if the Public Service Broadcaster introduced good quality and adequate content in Albanian, Bosnian, Vlach and Bulgarian, it would have a beneficial effect on the overall media scene in these languages.
- It is completely unacceptable for public service broadcasters to employ journalists and other media workers through recruiting agencies, i.e. "on lease". It is necessary to urgently abandon this practice and find a way to renew the staff in cooperation with the state, especially in the editorial teams of minority programs.
- Public service broadcasters need to make additional efforts and improve the genre structure of the minority language programs. Significant amounts of music, cultural and artistic, even children's programs are broadcast in certain languages (Hungarian, Romanian, Slovak and Ruthenian), while the remaining languages are completely dominated by the news content.
- Amendments to the Law on Public Media Services should oblige public broadcasters to strictly respect media and political pluralism, as well as to establish mechanisms for permanent supervision over the application of this legal provision. This applies to both the minority and the majority content.

- Public service broadcasters should pay special attention to the production of media content on topics important for the life and work of citizens in local and regional communities, taking into account in that sense the information in the mother tongue. In order to approach citizens at the local and regional level, public service broadcasters need to use new technological platforms and opportunities.
- It is necessary to harmonize programs in minority languages on public service broadcasters with high standards of the profession, and to use the standardized language of the national minority in them. This specifically refers to RTS and their Albanian-language programme "Lajmet".