

Open Data – a Tool for Better Project Co-Financing of Media Content

*Analysis of data from the process of project-based
co-financing of media content at all levels of
government in the period from the beginning
of 2015 to the end of 2021*

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Introductory words

In front of you is a publication made within the project Open Data – a Tool for Better Project Co-Financing of Media Content, implemented in 2020 and 2021 by the [Novi Sad Centre for Sustainable Communities](#) in cooperation with [the OSCE Mission to Serbia](#) and [the Ministry of Culture and Information of the Republic of Serbia](#). This is not the first time that our organization has analysed public calls for project-based co-financing of media content: we participated in the preparation of the [White Book on Project-based Co-financing](#) in 2016, in cooperation with journalists' and media associations. At the end of 2020, the Centre for Sustainable Communities published the publication "[Open Data for Better Co-financing of Media Content](#)", which summarizes and analyses data from the process of project-based co-financing of media content at all levels of government, from early 2015 to late September 2020.

Implemented projects under a common name Open Data – A Tool for Better Project Co-Financing of Media Content, implied a thorough work on collecting available data on the process of project-based co-financing of public interest in the field of public information in the period from early 2015 to the end of 2021. Data were collected from the public calls of the Ministry of Culture and Information, the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities, and the competitions organized at the level of local self-governments, i.e. towns and municipalities. The fact that we collected and analysed data on as many as 13,967 approved media projects (1,669 applicants) is the best evidence of the scope of work. Existing databases on approved projects, such as the Journalists' Association of Serbia ([UNS database](#)) or the "[Ke\\$formisanje](#)" database, were used for missing information if the local self-governments did not provide decisions on public calls during the project. The good news is that a huge percentage of local self-governments responded promptly to requests made under the Law on Free Access to Information of Public Importance during 2021, more than in 2020. On the other hand, decisions on the allocation of funds of higher authorities (republic and provincial levels) are available on their websites. We would like to take this opportunity to thank our colleagues from UNS, other journalists' and media organizations, as well as "Krik" (Crime and Corruption Reporting Network). We also extend our thanks to the local self-governments that provided the requested data, hoping that our project will contribute to the improvement of the methodology of their further collection and publishing on the Open Data Portal¹.

1 [The National Open Data Portal](#) is a repository of open data sets owned by state bodies of the Republic of Serbia (which includes state administration, autonomous province and local self-government bodies, as well as organizations entrusted with the exercise of public functions

The aim of the projects, therefore, was not only to collect and analyse data but, in general, to promote open databases in the field of public services. The transparency of government and the improvement of public service standards largely depend on open and machine-readable data. The development of open databases enables and facilitates the control of the institutions' performance results, which is a precondition for the development of a democratic and modern society. In that sense, as part of the project implementation, we have developed a [web application](#), which is presented to you and which will allow the search and analysis of the collected data in different ways. There is also a possibility to download the data in a functional format for further manipulation. Therefore, the goal is to provide researchers, media representatives, government representatives, but also citizens, with access to data that can be the basis for some future research of the media market and the relationship between the authorities and the media outlets. In addition, you can download other outputs of our project via [our website](#). It contains a link to the code for creating the application, further contributing to the openness of our work and representing an important element in publishing open data, which is – their visual presentation. With the help of the code, users of the R programming language will be able to gain additional insight into the data and the way they are processed, and the code is reproducible and can be used for other purposes and analyses. The free-to-download code and methodology can serve those interested for creating similar web applications, facilitating the monitoring of the processes of project-based co-financing of media content in local communities. We believe that our project and its outputs will contribute to the transparency of the entire process and the promotion of good practices also through the evaluation of approved projects, among other things.

All data are also available on the [Open Data Portal of the Republic of Serbia](#). Our goal is to support and assist with our recommendations the important task of the authorities in the process of European integration – to develop and make accessible and functional the data they "produce".

Unlike the existing databases, our project for the first time introduces the classification of approved projects according to the thematic framework. The topics of the approved projects are derived from their titles, and are classified into eight categories: ecology and health, economics, news program, culture and education, underprivileged groups, other, minority content, sports. Although we are aware that project names are not a substitute for evaluating

– e.g. Government, ministries, municipalities, agencies, regulatory bodies, institutions, utilities and others). The Open Data Portal is conceived not only as a repository of open data of state bodies, but also as a place of interaction with the community that uses the data.

their content, produced with public money, we felt that they could indicate certain trends in this area. The brochure is divided into the following parts: historical overview of project-based co-financing of media content with the aim to inform the general public about this process, followed by the methodology of work (it will be set aside in the application as a separate document for easier handling by the users), analysis of data collected during the project and, finally, recommendations in order to improve the transparency of project-based co-financing in the future. It is important to stress that our project will be active in the forthcoming period, i.e. that we will be happy to include all corrections (errors are possible due to the amount and complexity of data) and suggestions in our reports, so please feel free to [contact us](#) for that purpose.

Project-based Co-Financing of Public Interest in the Field of Public Information – a Brief History

At the beginning of the last decade, experts and media and journalists' organizations believed that legislative reforms, i.e. new media laws, could substantially improve the quality and change the media scene in Serbia, and encourage public information in line with the interests of citizens. The introduction to the reform was the adoption of the Media Strategy² in 2011, which – with some critical reservations – was supported by the professional public. The new government, constituted in 2012, formally followed the path set out in the 2014 strategic document, and accordingly adopted a set of media laws – the umbrella Law on Public Information and Media³, the Law on Electronic Media⁴ and the Law on Public Media Services⁵. It was believed that the new regulatory framework that denoted the state's withdrawal from the ownership in the media sphere would enable fair market competition, strengthen media pluralism and reduce political influence on the media outlets⁶.

² Strategy for the Development of the Public Information System in the Republic of Serbia until 2016 (Official Gazette of the RS, No. 75/2011)

³ Law on Public Information and Media (Official Gazette of the RS, No. 83/2014, 58/2015 and 12/2016 – authentic interpretation)

⁴ Law on Electronic Media (Official Gazette of the RS, No. 83/2014 and 6/2016)

⁵ Law on Public Media Services (Official Gazette of the RS, No. 83/2014, 103/2015 and 108/2016)

⁶ By the way, previous media laws, from the beginning of the 2000s, stipulated the state's withdrawal from the ownership in the public media, but they were suspended by certain by-laws, under the pretext that the privatization of the media could jeopardize public information in the languages of national minorities.

An integral part of the reform initiated a little over ten years ago is the [Strategy for the Development of Public Information System in the Republic of Serbia for the period 2020 to 2025](#), adopted in early 2020, which actually identifies, elaborates, systematizes and promotes the key elements of the process. Unfortunately, only in June 2021, a Working Group was formed to prepare a Draft Law on Amendments to the Law on Public Information and Media, comprising of 35 members who are representatives of journalists' and media associations, state bodies and institutions. Although it started enthusiastically, by the time of writing of this document there are still no indications of when the Draft will appear in public and when it will enter the public debate process. This will be discussed later.

Beside the state's withdrawal from the ownership in media outlets, the main point of media reforms was and still remains – the establishment of a system of project-based co-financing of media content of public interest, which includes legal definition of public interest, procedure for allocating the funds and independent commissions composed of media experts, or representatives of journalists' and media associations⁷. It was believed that this system would have provided the citizens of Serbia with significantly better quality media content. Even before these legislative changes, the Ministry of Culture and Information, the Provincial Secretariat for Culture and Public Information and some local self-governments financed the media outlets and media content through public calls, but those were rather examples of good practice than a product of clearly defined and binding procedures. Another important issue is the withdrawal of the state, at all levels, from the ownership in the media outlets.

The substance of the two interdependent elements of media reforms – privatization and project-based co-financing – is to establish a different relationship between the state and the media outlets. By withdrawing from the ownership, the state does not lose its constitutional obligations⁸ to provide information in accordance with the public interest. According to the new legal solutions, it will meet its obligations, instead of through state subsidies or public company funds, through public calls for media project proposals at the level of the republic, province and local self-government. Thus, the state intervenes in the media sphere – following the spirit of the law – in order to pro-

⁷ The Law on Public Information and Media stipulates that the members of the commissions shall be appointed by the head of the body that launched the public call, from the ranks of independent media experts and media workers who are not in conflict of interest and do not hold a public office. The majority of members, the law says, shall be appointed based on the proposal of journalists' and media associations if such a proposal exists and if the proposed persons meet the conditions prescribed by law.

⁸ The Constitution of Serbia, in Article 51, reads that everyone has the right to be informed accurately, fully and timely about issues of public importance.

vide citizens with good quality information, free from political, economic or other interests of those with power and/or authority in the society. Commissions, which would comprise of competent and indisputably moral individuals in accordance with the spirit of the law, should be a guarantee that by spending public money the government will not exert political influence on the financed media outlets.

Legal solutions are supported both by relevant associations and key international stakeholders, because it was clear that without investing state money in the media sphere, many good quality media outlets and media content would not be able to survive in a very fragile media market. In the conditions of low media literacy and the absence of donations from abroad – this market does not allow a competition to be won by the media outlets and content that largely respect the professional and ethical standards of journalism and open new horizons of media freedom in accordance with those standards. Quite the opposite. Due to the media laws, in 2014 and 2015, Serbia experienced a significant rise in the comparative rankings of international organizations that measure media freedoms in the world, with the conviction that creating fair market competition, along with the aforementioned qualitative state intervention, can ensure media sustainability and higher level of media freedoms.

Seven and a half years have passed since the adoption of the media laws, and today we can say with considerable certainty that the great expectations of the professional public have been largely betrayed, because media reforms have not improved the Serbian media scene nor provided much-needed pluralism in public information. On the contrary. Some believe that the problem the media scene is facing is complementary to the problems in other areas – and that is a poor implementation of laws, while others believe that the situation could be significantly improved by re-amending those laws. However, many experts believe that the current laws, along with good governance, could significantly improve the media scene, and ask the question: is it possible for the government to be forced to comply with those laws by amending them? As for the project-based co-financing, if we exclude a few examples of good practice at the re-public level, as a rule, especially at lower levels of government, the spirit of the law which should prevent the authorities from exerting political influence on the media outlets, has not been complied with. In contrast, in practice, the private media outlets that are under a more or less strong influence of politicians in power, and the media outlets that during the privatization fell into the hands of individuals associated with the ruling parties – with considerable media coverage thereof, are favoured.

Although Rulebook⁹ on project-based co-financing of public interest content in the field of public information states among the important criteria for project evaluation – compliance with ethical and professional standards¹⁰, it happens very often that the media outlets which violate the Code of Ethics of Journalists of Serbia regularly, on daily basis, in an undisguised way, receive significant amounts of funds through the mechanism of project-based co-financing¹¹. For example, according to our data, two publishers, Insajder Media Tim and Info IT Media, associated with the daily “Informer” known for dramatic violations of the journalists’ Code of Ethics, earned 44,200,000 dinars (372,547 Euro) in the monitored years through this mechanism. In addition, anonymous persons, reasonably suspected for not deciding on the quality of the project but only implementing the earlier decisions of the government officials, are appointed to the independent commissions, which should be composed – as stated – of professional and indisputably moral persons with rich experience, which is in significant contrast to the spirit of media reform.

Expert Analyses and Recommendations

Already the first expert analyses of the process of project-based co-financing of the public interest in the field of public information have identified problems in the implementation of this model of state intervention in the media sphere. White Book¹², published by journalists’ and media associations and monitoring this process in the first two years of the implementation of the law, stated that the biggest problems faced by project-based co-financing were – incomplete legislation, insufficient transparency of the process, lack of evaluation of the implemented projects (and of the process itself), as well as the absence of sanctions for the bodies responsible for public information in case of violation of the law. The paper records a large number of “circumventions” of the law, and it states that representatives

9 The Rulebook is a by-law issued by the Ministry of Culture and Information and valid for all levels of government.

10 The Rulebook on project-based co-financing for the realization of public interest in the field of public information (Official Gazette, No. 16/2016 and 8/2017) states the criteria on the basis of which the evaluation of the applicants will be performed: 1) the extent to which the proposed project activity is suitable for achieving the public interest in the field of public information; and 2) a measure for providing a greater guarantee of adherence to professional and ethical media standards.

11 Take, for example, the Press Council’s research entitled “[Co-financing of Media Violating Ethical Standards](#)” (Press Council, Belgrade, June 2020).

12 [White Book on Project-based Co-financing of Public Interest in the Sphere of Public Information](#), April 2015-April 2016, Coalition of journalists’ and media associations – Centre for Sustainable Communities, May 2016.

of non-representative associations very often enter the commissions, which is “the most common signal for possible irregularities and malfunctioning.” The White Book, among other things, recommends that mechanisms be provided for enabling transparency of the process, evaluation of projects, and participation in the commissions of competent and unquestionably moral persons. Besides, it is recommended that local self-governments undertake to organise public calls for media, because it was established that some of them had not done so, which is contrary to their legal obligation¹³. In addition, the White Book compares the amount of funds allocated for the public calls to the local self-government budget, and one of the members of the Coalition – the Journalists’ Association of Serbia – led a campaign to legally oblige self-governments to allocate two percent of their budget for the media outlets¹⁴. Unfortunately, the findings and recommendations of the White Book have never been answered by the amendments to the laws, by-laws or improvements to the practice of government bodies organising public calls for media. On the contrary, the practice deteriorated significantly in the following years, which was regularly reported by numerous media outlets – most often by research centres such as CINS, KRIK and BIRN. The message of a large number of research and analytical papers on public calls, primarily at the local level, is that the media outlets close to the government (including, as pointed out, those not caring too much for the Code of Ethics of Journalists of Serbia) are absolute favourites when receiving funding at public calls, while the media outlets with critical stance towards the authorities are complete outsiders. In many cases, project-based co-financing has essentially turned into payment for marketing services, i.e. media financing for the sake of uncritical promotion of the activities of government representatives, which is deeply inconsistent with the goal and significance of media reforms. The White Book, which, as stated, observed the application of the law during 2015 and 2016, does not state as a significant problem the co-financing of media outlets that continuously and dramatically violate the Code of Ethics of Journalists of Serbia. For the simple reason that substantially, in practice, this was not the

13 Article 20 (paragraph 10) of the Law on Local Self-Government (Official Gazette of the RS, No. 129/2007, 83/2014 – other law, 101/2016 – other law and 47/2018) classifies among the competencies of local self-government “taking care of the public information on the territory of the municipality”.

14 Note that the Town of Kragujevac has not organised a public call for project-based co-financing of media content of public interest from 2015, since the adoption of the new set of media laws, until 2020. In 2021, this town organised a public call for project-based co-financing of media content for the first time. Some other local self-governments have organised public calls of symbolic value, which do not meet – according to the association – the needs of the citizens.

case. Indeed, the analysis in front of you shows that this problem occurred later, i.e. that contrary to the criteria set by the Rulebook on Project-based Co-financing, there was a large outflow of citizens’ money to media outlets that usually violate the professional code only in the period from 2017 onwards.

For example, according to [the analysis of the Press Council](#), in the period from July to September 2021, ten dailies violated the Code of Ethics of Journalists of Serbia 2,625 times. The infamous record holder is the daily “Alo” (570), followed by “Informer” (448), and the third-ranked daily is “Srpski Telegraf” (437). Publishers associated to these three dailies, Insajder Media Tim, Info IT Media, Medijska Mreža and Alo Media System according to our database, earned as much as 106,928,802 dinars (900,427 Euro) in the process of project-based co-financing from the early 2015 to the end of 2021.

KRIK’s portal “Raskrikavanje” kept records of project-based co-financing of media content in recent years, and also came to the conclusion that huge citizens’ funds ended up in the pockets of media owners close to the authorities who are both record holders in violating the law and code of ethics, and in spreading fake news and hate speech¹⁵. There is another rule: lesser-known production companies are also applying for the public calls with great success, the ones related primarily to the electronic media outlets close to the government, mostly serving only as another channel for financing these media outlets. The research and analysis in front of you show that the state of Serbia in the observed period, at all levels, allocated for media projects from 9.7 million to slightly about 15 million Euro (2020). There is a noticeable upward trend year after year, with a small decline recorded in 2021 compared to the previous year (in 2021, approximately 13.7 million Euro were allocated). With such application of the law and the noted problems, the conclusion is self-evident – project-based co-financing has been largely transformed into a system for financing “obedient media”, and not for good quality information content that is in line with the interests of citizens, which will help them make well-informed important decisions in life.

What is the Way Forward?

In addition to the White Book, there are a number of studies that have dealt with project-based co-financing of media content in recent years. We have already mentioned some but not the others¹⁶, although they are all in agreement that there are many problems in this area, and that increasing the trans-

15 Look at [Ke\\$formisanje](#).

16 Take a look, for example, at the very useful analysis [“Regulating Project-Based Co-Financing of Media Content: Legal Analysis with Recommendations”](#), BIRN, Belgrade 2017.

parency of the entire process is a precondition for their solution. Adopted at the beginning of 2020, the new Media Strategy¹⁷ pays great attention to project-based co-financing and the ways in which this process can be improved, combining all previous professional insights and analyses. Judging by the scope and solutions, this segment was probably addressed the most. It is clear that this document also strongly supports the transparency of the process.

The Strategy, as well as numerous analyses, state that the media outlets “close to the ruling party in terms of editorial policy” are favoured in the distribution of funds during the public calls for project-based co-financing. It is also stated that such implementation of the law is one of the “dominant forms of pressure” on the media outlets, especially at the impoverished, local level. The Strategy envisages a number of measures that need to be taken to ensure “adequate realization of the purpose of project-based co-financing”, so it is proposed to amend the existing regulations in terms of introducing missing content analysis, sanctioning non-compliance with laws, prescribing criteria for members of commissions for the assessment of the quality of projects and their stronger commitment to take into account the respect of professional and ethical norms of the applicant when assessing the quality of certain projects. It provides for an important role of the Press Council in the print and on-line media.

The Media Strategy and its accompanying document, the Action Plan, envisage, in addition, the obligation of independent evaluation of implemented projects and the exclusion of the possibility that project-based co-financing serves to cover costs outside the associated costs of producing content of public interest. Especially interesting is the paragraph referring to the transparency of the whole process, which implies “the introduction of the possibility of a centralized system for application through a single information platform, which would, among other things, enable the implementation of legal provisions prohibiting funding, over a certain percentage, of the same projects by different levels of authorities, but also the availability of content funded in this way to all, in areas wider than those that the media initially covers. That would be realized in such a way that the information platform would enable the search for projects, applications and decisions, and contain links to broadcast or published content funded in this way.”

This information platform is in line with the initiative of the Human Rights Committee from Niš, which has been advocating for years that all media content supported through project-based co-financing be easily accessible and free of charge to the citizens, which will simplify project evaluation,

17 Strategy for the Development of the Public Information System in the Republic of Serbia 2020-2025 (Official Gazette, No. 11 of 7 February 2020)

improve their quality and reduce potential abuse¹⁸. In that sense, our database can be interpreted as an important step in that direction.

According to the latest information, the Working Group in charge of preparing the Draft Law on Amendments to the Law on Public Information and Media is finalizing its work. It is very important that these amendments comply with the solutions from the Media Strategy, as well as to eliminate shortcomings in the regulation of project-based co-financing of public interest in the field of public information, which we noted in our last year’s report, but also others that were monitored by other organizations following this process and proposing adequate solutions. As a reminder, the Press Council provides its opinion on the project applicants in terms of compliance with the provisions of the Code of Ethics of Journalists of Serbia. Even though it is not binding, this opinion should have a strong impact on the members of the commissions for public calls. The tendency to dilute the important role of the Press Council is in complete contradiction with the Media Strategy and regulations in force.

It should also be pointed out that it is very important to include in the amendments to the Law on Public Information and Media an analysis of the missing media content, on the basis of which public calls will be prepared, as well as the evaluation of supported projects. After all, the state strategically opted for it in its Media Strategy.

Let’s get back to the new Media Strategy, which is undoubtedly a good quality document. It is clear that the members of the working group for drafting this document – as we said – really tried to ensure that the area of project-based co-financing was properly addressed, but the key question that has already been asked remains – can the government be forced to comply with the laws by amending the law? Namely, some media experts warn that in a political context that does not imply a high degree of rule of law, as evidenced by the reports of European institutions on Serbia’s progress in the European integration process, it is easy to find mechanisms to circumvent the most perfect legal provisions. However, we can only hope that the law amendments resulting from the strategic document will alter the practice of the government directing public funds to “its media outlets” through the mechanism of project-based co-financing, and possibly leaving some crumbs for the independent ones. As time goes by, hopes are decreasing. Specifically, let’s look at, for example, the provisions stipulating that members of commissions have the necessary, defined expertise. It is certainly something that is good and important, but to be honest, the government will – if it wants – find dozens of experts

18 [“How to improve the transparency of media content co-financed with public money?”](#), Analysis, Human Rights Committee, Niš, November 2020.

who won't even consider projects, but will only implement political decisions made in advance. Some warn that neither state bodies nor non-governmental organizations have the capacity to conduct a quality evaluation of projects given their huge number, as our analysis shows. Namely, in the period from 2015 to December 2021, a total of 14.022 media projects were financed at all levels of government.

Existing analyses and searchable data on the project co-financing process (such as this web application in front of you) provide us with a good understanding of the project-based co-financing process since 2015 (the first year of the application of the Law), for finding solutions to improve it, even if it will benefit some other future times when we will live in a democratic country nurturing good quality journalism in line with the interests of citizens, the independence of institutions and the tradition of media freedoms. For the sake of being optimistic, we could say that this process, if nothing else, has enabled a clear and precise insight into this segment of relationship between state bodies and the media outlets.

Finally, it should be said that the process of project-based co-financing of media content is a model that, if it were really implemented as required by the professional public, could really significantly improve our media scene. Therefore, it should not be easily given up, and neither should its improvement.

Methodology

The main subject of our research and analysis were decisions on the allocation of funds in public calls for co-financing the public interest in the sphere of public information, which we collected by referring to the Law on Free Access to Information of Public Importance or searching the portals of the authorities – in this case of the Ministry of Culture and Information and the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities and some other local self-governments with functional websites. We collected a small part of the data thanks to the existing databases on project-based co-financing, which we reported on in the section Introductory Words in this publication.

We remind you that according to the Law on Public Information and Media, each authority that launched the public call makes a decision on the allocation of funds in the form of a resolution (with an explanation). In the past seven years of the project-based co-financing process, there has been a noticeable progress in the making of decisions, which in the first years were largely inadequate¹⁹. Not only do they now contain, for the most part, explanations of the decision, but

¹⁹ Many decisions did not contain some of the basic data, some omitted the name of the project applicant, others the name of the media outlet or the project name.

other available information is also supplemented, which has made it easier for us to work on data selection. However, in our opinion, the content of the decision is still far from what should be in them, and we have stated so in the recommendations that you can find at the end of this brochure. First of all, they do not contain machine-readable data, which greatly complicates the work of researchers and analysts.

All data, systematized, and web application can be found on and freely downloaded from [our website](#), where you can find other outputs of our project as well. On the website you can find a [link to the code for creating the application](#). With the help of the code, users of the R programming language will be able to gain additional insight into the data and the way they are processed, and the code is reproducible and can be used for other purposes and analyses.

The significance of the methodological notes in front of you is primarily to understand the process of collecting and selecting data for the development of the web application, but also to facilitate its use.

Explanation of the Data Columns on the Web Application

The table that you can download in excel and csv format contains the following columns:

1. **AUTHORITY LAUNCHING THE PUBLIC CALL / MUNICIPALITY** – refers to the institution organising the public call: the Ministry of Culture and Information, the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities and 152 local self-governments (towns and municipalities). Since the town municipalities are not obliged to launch public calls for project-based co-financing, only those town municipalities that have launched the public call at least once are listed (for Belgrade they are Lazarevac, Mladenovac and Obrenovac, and for Niš – Pantelej, Crveni Krst and Medijana).
2. **TOWN / MUNICIPAL REGISTRATION NUMBER** – This column is only in the data that can be downloaded in excel and csv format and represents the registration number of the town or municipality that launched the public call. These data were downloaded from the website of [the Republic Geodetic Authority](#).
3. **YEAR** – column that refers to the year when the decision on the allocation of funds was made.

4. **PROJECT APPLICANT** – This column records the names of project applicants (companies, agencies, etc.). The data were checked on the [website of the Business Registers Agency \(APR\)](#). Due to the inconsistent use of upper-case and lower-case letters in the APR register, all project applicants are written in capital letters. In some situations, the project applicant represents an institution such as a faculty or a religious organization not registered in the APR. In that case, their name was taken from the decision on the public call.

5. **APPLICANT ID NUMBER** – This column is only available for download in excel and csv format. The ID number is taken from the APR website. Since institutions such as the Faculty of Political Sciences are among the project applicants, ID numbers have been taken from the registers they are entered in. Also, there are cases for which there is no information on the ID number on the APR website, and there are some applicants registered in the territory of AP Kosovo and Metohija²⁰ who are not in the register, so they are registered under code 11111111. If the applicant are entities registered outside the borders of the Republic of Serbia, they have been assigned the code 22222222.

6. **MEDIA OUTLET NAME** – This column refers to the name of the media outlet to which funds have been allocated. Please note that there is a separate register of media outlets that is kept by APR, and that the media outlets do not have the status of a legal entity, but their founder (project applicant) has it. Media names have also been aligned with the APR database. If the funding was for expert meetings, conferences or workshops and this was clearly indicated in the project name – this column is left blank. If no information was given to which media outlet the funds for the production of content were allocated, the key was taken from some public call decisions, e.g. by the Provincial Secretariat, and the word “Production” was entered in this column. In situations when the media publisher is the owner of only one media outlet according to the APR, and the name of the media is not stated in the decision on the public call, the name of that media outlet from the APR is entered.

7. **PROJECT NAME** – This column is filled in if the decisions contain project names. If they are not specified, the field remains blank. If the public call has been cancelled, has not been organised or the funds have not been allocated, everything

²⁰ All references to Kosovo in this application and the data, whether to its territory, institutions or population, shall be understood in full compliance with UN Security Council Resolution 1244.

the case of the public calls for the Autonomous Province of Kosovo and Metohija and the public call for information in the Serbian language outside the territory of the Republic of Serbia – that information is added in brackets immediately after the name of the project.

8. **PROJECT TOPIC** – Project topics are derived from their names, where they were listed. We have identified and classified eight thematic frameworks: ecology and health care, economy, news programme, culture and education, underprivileged groups, other, minority content and sports. These topics follow the definition of the public interest from the Law on Public Information and Media. Where there was no project name, this column remained blank. A number of project names that do not fall under any of the above topics are registered under – Other. It is clear that this is not a perfect methodological approach and that a clear definition of the thematic framework could only be determined through project evaluation. Therefore, it is rather an indication of topics, which in our opinion can demonstrate certain trends. We hope that the results of our project will allow for easier work of the researchers on deeper and more specific analyses of project-based co-financing.

- Ecology and health care

This topic broadly covers everything related to environmental protection and health care.

- Economy

This topic broadly covers agriculture, tourism, the economic segment of the European integration and rural development.

- News programme

This topic covers production of the news program. Although the co-financing of the news programme was justified in some cases, the impression remains that in many cases it was not the public interest defined by law that was financed, but regular media production. This can also be a topic for deeper analysis.

- Culture and Education

This topic covers a wide range of cultural and various educational contents, including the organization of expert events.

- Minority Content

This topic covers not only the production of content in the minority language, but also the content about certain minorities and their culture. All media content in minority languages is placed in the “minority category”, although they are, of course, thematically diverse. The aim of such an approach was to treat information in

minority languages as a separate phenomenon – with the aim of observing how the state takes care of it. Of course, we also recommend further, deeper research on this topic, the basis of which can be data and web applications created during the implementation of this project.

■ **Underprivileged Groups**

This topic is broadly set to include various groups, such as persons with disabilities, diabetes, multiple sclerosis, but also groups such as – women, youth, elderly and children. This classification is too broad and could be further divided into certain subtopics.

■ **Sports**

This topic covers the production of sports media content.

■ **Other**

This topic covers sub-topics such as religion, or increasing the birth rate. Topics that were not clearly defined to be unequivocally included in any of the above areas are also classified in this category.

9. FUNDS IN DINARS – This column represents the nominal values allocated to a specific project applicant based on the decision to allocate funds. Since these values are nominal, they are not used for comparisons by year and for cumulative graphs, but the FUNDS IN EUROS column is used for this.

10. FUNDS IN EUROS – This column is calculated based on the middle annual exchange rate for the Euro for each year in the period 2015-2021, and the data are taken from the [website of the National Bank of Serbia](#). For this reason, this column is used for comparisons by year and cumulative values in graphs and tables. Researchers are aware that a more realistic presentation would be to use real values that would be recalculated based on the consumer price index, but due to easier understanding of the entire table, it was decided to use the middle exchange rate for the Euro.

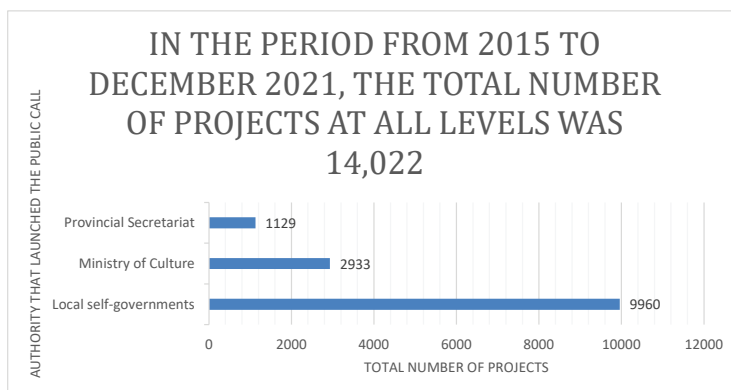
Code for Web Application and On-Line Publication

The code can be downloaded from the following [link](#) – it is written in the R programming language. The whole application was created primarily with the help of the shiny library. The code, which you can find in the app.R file on the previous link, is divided into 3 parts: processing of the data, ui (user interface) which refers to defining the appearance of the application and the server part where the interactivity and connectivity of different parts of the application is actu-

ally created. The sections marked with # represent comments that explain what each piece of the code is used for. This should make the understanding of the code easier. The code and the data can be downloaded under the [Creative Commons Zero v1.0 Universal license](#). While this is the most open license possible, we would appreciate letting us know if you use the data or code for web application, so we can track its further use and development. Thank you in advance. In addition to the code for creating the application, you also have the opportunity to download the code used to create the on-line version of the publication (Index.html and Index.Rmd files), which will be updated if the data changes. This is another way in which we want to support the full transparency and reproducibility of research in this area with the ultimate goal that others can contribute to the improvement of both the application and the analysis. We are confident that by working together, with an open approach, we can make this process significantly better.

Analysis of Collected Data

The analysis of data collected during the implementation of the project Open Data – a Tool for Better Project Co-Financing of Media Content, that is in front of you, is not comprehensive, but is just an example of how the data can be approached to and how it can be treated. As stated in the introduction, the goal of our project was primarily to provide researchers, media outlets and government representatives and other stakeholders with access to systematized data and their functional use. The data and the accompanying application can be useful for various researches, but also as a basis for further work on gathering the necessary information for some future, deeper and more extensive analyses. Unlike the existing databases, this allows data to be downloaded in an open and machine-readable format for further analysis, and, in addition, introduces a classification of approved projects based on the thematic scope. In the methodology, we explained how we performed the thematic categorization of approved projects. As previously pointed out, 2015 was the first year of the implementation of the media laws adopted in



GRAPH 1.1

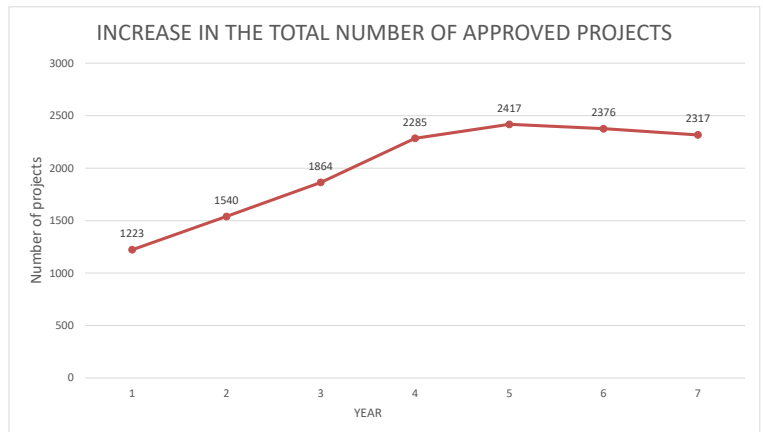
August 2014. Our research covers the period from the beginning of that year to December 2021, when we collected the last data. The data do not include the so-called individual payments, i.e. funds that are distributed under the decision of the head of the body responsible for public information affairs, without conducting a public call. A maximum of 5% of the total funds allocated for the realization of the public interest through public calls may be designated for individual payments.

Some media experts also called 2015 the “baseline year” of the law implementation, implying that many local self-governments would encounter for the first time the phenomenon of project-based co-financing of media content, i.e. that it would be a completely new mechanism for them. In that sense, some omissions are expected, i.e. discrepancies in the new legal reality. We have already pointed out that the Ministry of Culture and Information (hereinafter: the Ministry), Provincial Secretariat for Culture and Information (hereinafter: the Secretariat), and some local self-governments organised public calls for media in the previous period, so it can be concluded that they were ready for the new media legislation.

In the period from the beginning of 2015 to December 2021, the total number of approved media projects at all levels was 14,022, of which the Ministry financed 2,933, the Secretariat 1,129, and local self-governments (total of 152) – 9,960. It should be borne in mind that 10 local self-governments out of 152 analysed (Batočina, Bosilegrad, Gadžin Han, Golubac, Kostolac, Lapovo, Lučani, Rača, Sjenica and Žabari) did not organise a single public call in the period from 2015 to 2021. Most of the town municipalities did not organise any public calls either, but they were not taken into account (except for the Belgrade municipalities of Obrenovac, Mladenovac and Lazarevac and Niš municipalities of Medijana, Crveni Krst and Pantelej), because according to the interpretation of the law they were not obliged to co-finance the media outlets through the project-based co-financing. The good news is that in 2021, for the first time the City of Kragujevac launched a public call for project-based co-financing media content in accordance with the public interest and for this purpose allocated 9,224,000 dinars or 78,461 Euro.

The number of approved media projects had increased year after year, by 2020. The total number of supported projects at all levels of government during 2015 was 1,223, and later it grew year after year (2016 – 1,540; 2017 – 1,864; 2018 – 2,285; 2019 – 2,417; 2020 – 2,376). In 2021, there was a decline in approved projects (2,317), which is approximately the number of projects approved in 2018.

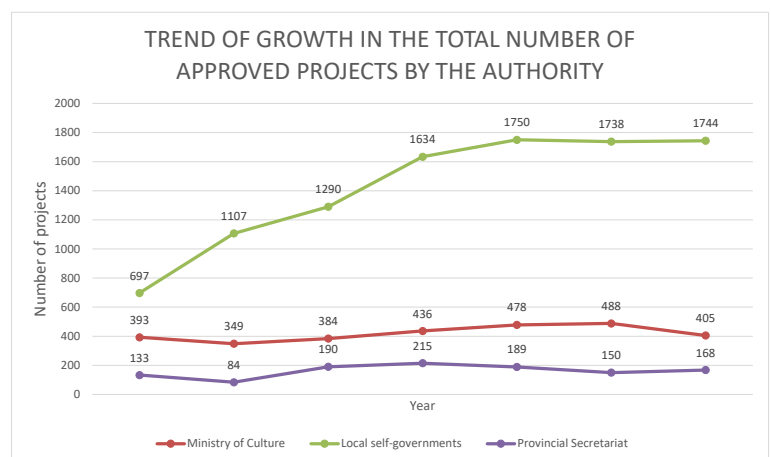
By 2020 we record a gradual increase, if we exclude 2016, in the number of media projects approved by the Ministry (2015 – 393; 2016 – 349; 2017 – 384; 2018 – 436; 2019 – 478; 2020 – 488), and in



GRAPH 1.2

2021 this trend was interrupted and 405 projects were funded. Implemented projects at the level of local self-governments have more than doubled in the observed period, with a slight decline in 2021 (2015 – 697; 2016 – 1,107; 2017 – 1,290; 2018 – 1,634; 2019 – 1,750; 2020 – 1,738; 2021 – 1,744). The number of projects approved by the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities fluctuated, and reached its peak in 2018 (2015 – 133; 2016 – 84; 2017 – 190; 2018 – 215; 2019 – 189; 2020 – 150; 2021 – 168).

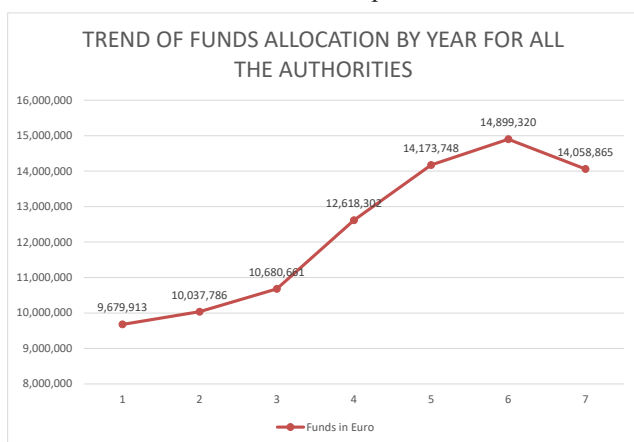
If we cross-reference the data on the number of approved projects with those that say that, in parallel and comparatively (2021 is an exception that does not deviate too much from the trend, especially if we take into account the fact that funds might have been allocated at the very end of 2021, which we did not treat in the analysis) there is an increase in the total amounts allocated for the public interest in the sphere of public information, the conclusion could be: if the system of project-based co-financing were implemented in accordance with legal provisions and good practices, it would have significantly improved the quality of the media offer, including media and content pluralism.



GRAPH 1.3

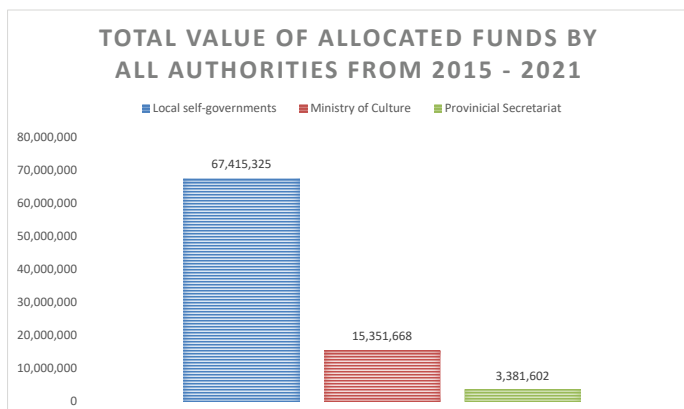
Project values

The total funds that the state has allocated at all levels for project-based co-financing of the media in the period from the beginning of 2015 to December 2021 amount to 86,148,595 Euro. And there is a noticeable ascending trend curve year after year, so the media outlets and media organizations received about 9.7 million in 2015, and in 2016 slightly over 10 million Euro. In 2017, the amount was approximately 10.7 million Euro, and in 2018 – 12.6 million Euro. In 2019, the state intervened through public calls in the media sphere with as much as 14.2 million Euro, and in 2020 a record of over 14.8 million Euro was reached. In 2021 we recorded a decline, with 14.1 million Euro awarded in all public calls.



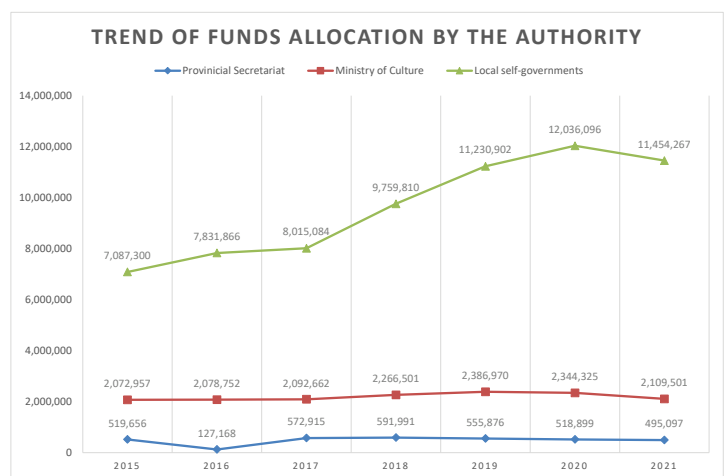
GRAPH 2.1

Local self-governments set aside a total of 67.4 million Euro for the purpose of project-based co-financing, the Ministry – 15.4 million, while the Provincial Secretariat spent 3.4 million Euro on public calls for media over seven years. However, it should be emphasized that this last body allocates considerable funds (around 300 million dinars a year) for media outlets in the languages of national minorities founded by National Minority Councils, not through project-based co-financing process but rather through direct payments, which indicates the inconsistency of the existing media legislation.



GRAPH 2.2

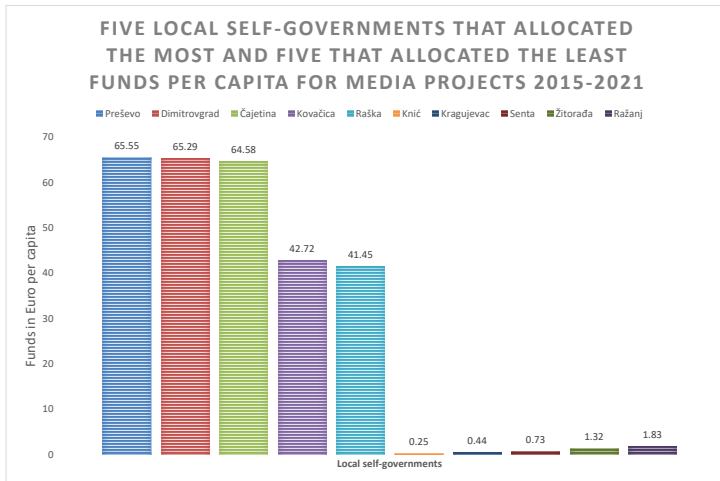
When we look at the value of approved projects by the authorities, we notice that the amount allocated by the Ministry, expressed in Euro, is more or less constant (2015 – 2,072,957; 2016 – 2,078,752; 2017 – 2,092,662; 2018 – 2,266,501; 2019 – 2,386,970; 2020 – 2,344,325; 2021 – 2,109,501 Euro), and that the Secretariat’s funding, if we exclude 2016, is more or less constant (2015 – 519,656; 2016 – 127,168; 2017 – 572,915; 2018 – 591,991; 2019 – 555,876; 2020 – 518,899; 2021 – 495,097 Euro), while the value of media projects supported by local self-governments increased significantly in the period from 2015 until today, with a recorded decline in 2021 compared to 2020 (2015 – 7,087,300; 2016 – 7,831,866; 2017 – 8,015,084; 2018 – 9,759,810; 2019 – 11,230,902; 2020 – 12,036,096 and 2021 – 11,454,267 Euro).



GRAPH 2.3

The five towns that allocated the largest funds for project-based co-financing in the observed period are Belgrade (4,495,084 Euro), Niš (3,571,745), Novi Pazar (3,309,477), Novi Sad (3,143,187) and Pančevo (1,923,715). More or less, these data follow the size of these local self-governments, with the exception of Kragujevac, which, as stated earlier, has not allocated a single dinar for project-based co-financing of the public interest in the field of public information by 2021.

It is interesting to observe how much has been allocated for public information by certain local self-governments in the past period in relation to the number of inhabitants living on their territory. In this analysis we did not include local self-governments that did not organise any public call for media content, nor city municipalities (of Belgrade and Niš) due to their specificity. The highest funds for the public interest in the field of public information, per capita, were allocated by the Municipality of Preševo (65.55 Euro per capita), followed by Dimitrovgrad (65.29), Čajetina (64.58), Kovačica (42.72) and Raška (41.45). The least funds in the seven-year period were spent by the Municipalities Knić (0.25

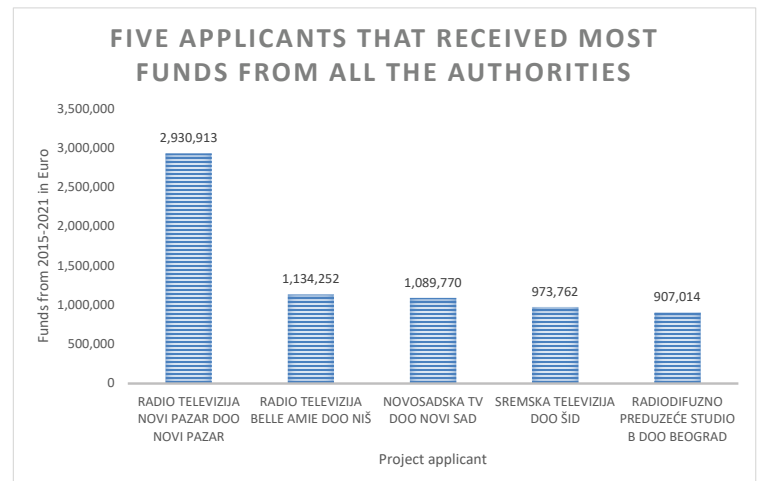


GRAPH 2.4

per capita), Kragujevac (0.44), Senta (0.73), Žitорада (1.32) and Ražanj (1.83).

As far as project applicants are concerned, the most money – collectively looking at all government bodies – was allocated to RADIO TELEVISION NOVI PAZAR DOO NOVI PAZAR (2,996,829 Euro for 21 projects), followed by RADIO TELEVISION BELLE AMIE DOO NIŠ (1,134,252 for 142 projects), NOVOSADSKA TV DOO NOVI SAD (1,089,770 for 111 projects), SREMSKA TELEVISION DOO ŠID (973,762 for 35 projects) and RADIO BROADCASTING COMPANY STUDIO B DOO BEOGRAD (VRAČAR) (907,014 for 25 projects). Among the five first place winners, there are as many as four media companies that were the subject of privatization during 2015 and 2016. It is clear from the above stated that some media outlets are oriented towards a smaller number of authorities with larger projects, while for others the funds they receive through the public call are dispersed.

At the public calls organised by the Ministry of Culture and Information, RADIO TELEVISION VRANJE D.O.O. VRANJE received the most funds (217,426 Euro), followed by COMPANY FOR PRODUCTION AND DISTRIBUTION OF RTV PROGRAMMES, TRADE AND SERVICES TV APATIN LIMITED LIABILITY COMPANY APATIN (148,870), RADIO-TELEVISION BUJANOVAC D.O.O. BUJANOVAC (144,610) and the JOURNALISTS' ASSOCIATION OF SERBIA (142,630). During the seven years, the Secretariat valued the most the media projects submitted by the ASSOCIATION OF THE BLIND OF VOJVODINA (156,037 Euro), the publisher of "Dnevnik" DNEVNIK VOJVODINA PRESS DOO NEWSPAPER PUBLISHING AND PRINTING COMPANY, NOVI SAD (139,102), the ASSOCIATION OF THE DEAF AND HARD OF HEARING OF VOJVODINA AUDIOLOGICAL CENTER (108,554) and the JOINT COUNCIL OF VUKOVAR MUNICIPALITIES, CROATIA (106,942).



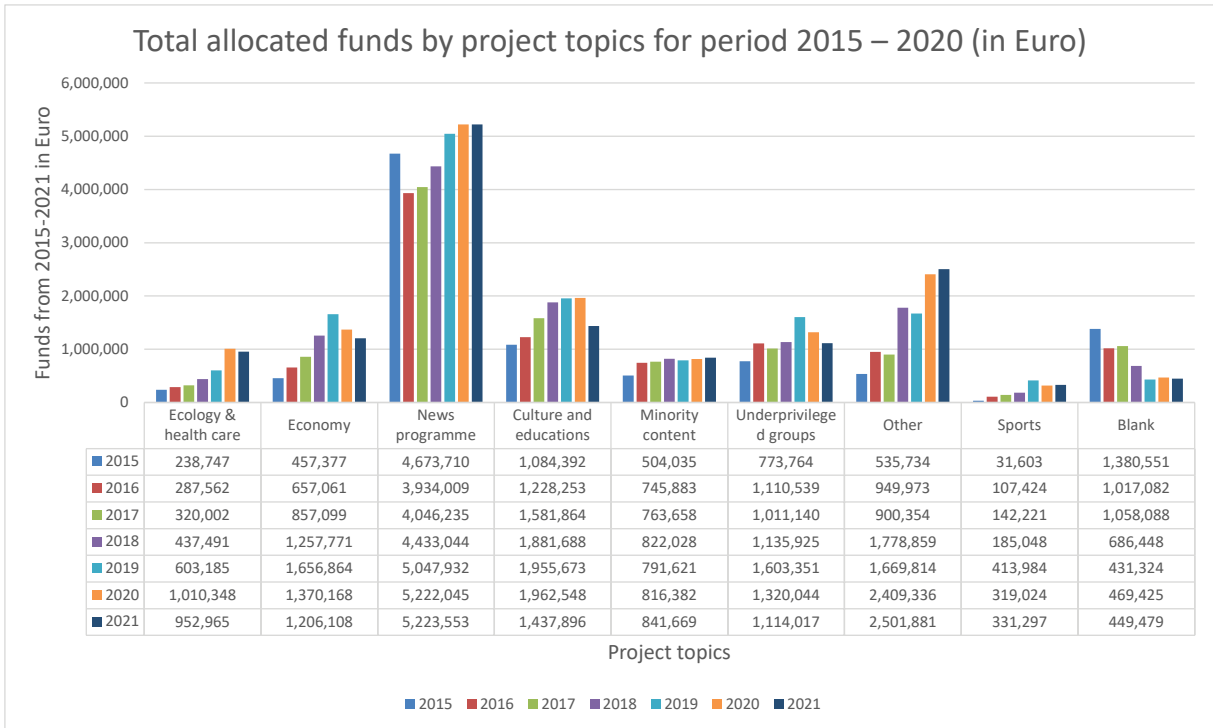
GRAPH 2.5

At the local level, it has been noticed that some media outlets receive funds even in the territories of the local self-governments where their programme is not broadcast, at least not significantly. When we look at all local self-governments, the most funds in their public calls were allocated to the RADIO TELEVISION NOVI PAZAR DOO NOVI PAZAR (2,542,331 Euro), followed by RADIO TELEVISION BELLE AMIE DOO NIŠ (1,100,527), NOVOSADSKA TV DOO NOVI SAD (1,032,889) and SREMSKA TELEVISION DOO ŠID (929,047). From all the above stated it can be concluded that there are media outlets that are favoured at the local level, while they are allocated significantly less funds at the provincial and republic level.

Thematic Frameworks

We have classified the supported projects according to the thematic frameworks, and aligned the thematic frameworks with the definition of public interest in the Law on Public Information and Media, but also according to the occurrences of some topics, which we have stated during the research. We have determined the thematic framework from the name of the approved project. By far the most represented projects are those related to the news program, while other topics are: ecology and health, economy, culture and education, minority content, underprivileged groups, sports and other. It is important to note that, in line with the methodology, we have classified all contents in the minority language into the same group (minority contents), regardless of the topic they cover. Among the minority contents we have also classified those whose topic is the national minority communities and their culture, for example. It would be interesting to conduct a separate study on the kind of media content in minority languages that the state encourages.

GRAPH 3.1

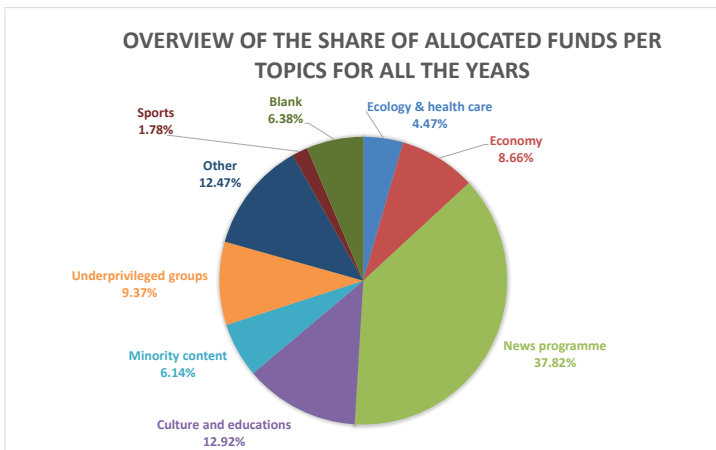


The fact that classic news content dominates is logical, but an in-depth analysis reveals that there is much among them that should represent the usual activity of the media outlets and that does not represent, at least not as a rule, the public interest. Also, we have concluded that there is a lot of content that represents the so-called monitoring of the work of government bodies, which is in fact contrary to what project-based co-financing should encourage, and that is – among other things – a critical stance towards the authorities. In this case, too, it would be interesting to perform an additional analysis to determine what percentage of projects actually represent a kind of marketing activity of the authorities. In any case, such projects are mostly present at the local self-government level.

As can be seen in the chart, by far the most money is allocated by the state for the news programme,

almost twice as much as for other media content. In 2015, the authorities allocated 4,673,710 Euro, followed by a decline, and then a constant increase until 2020, when it amounted to – 5,222,045 Euro. In 2021, in line with the decline in total funds for public calls for media, 5,223,553 Euro were spent for this purpose. For example, in 2021 for all other contents 8,835,312 Euro were set aside. In previous years, the allocation for culture and education has also increased (the second thematic framework in terms of total allocation), so from 1,084,392 Euro in 2015, it reached 1,962,548 Euro in 2020, with a decline in 2021 – 1,437,896.

When we look at the total amounts for all years and all the applicants, a total of 32,580,528 Euro or 37.82% of the total allocated funds for project-based co-financing in the period from 2015 to 2021 was allocated for the news program. The next topic, culture and education, received 11,132,314 Euro or 12.92% of the total seven-year budget for media projects. It is followed by projects that resist classification (other, 10,745,951 Euro or 12.47%), then by projects related to underprivileged groups (8,068,780 or 9.37%), the economy (7,462,448 or 8.66%), ecology and health care (3,850,300 or 4.47%) and, finally, sports (1,530,601 or 1.78%). Funds in the amount of 5,492,397 Euro or 6.38% of the total money went to projects for which we were not able to detect the topic, for the simple reason that some decisions on the allocation of funds, at the local self-government level, do not specify the names of projects. In the previous chart, we see that the number of such decisions is significantly declining, which is good news.



GRAPH 3.2

Recommendations for Increasing the Transparency of Project-Based Co-Financing of Media Content

1. The Law on Public Information and Media should be amended as soon as possible, in accordance with the Strategy for the Development of Public Information System in the Republic of Serbia for the period 2020 to 2025, with provisions that improve the transparency of the process of project-based co-financing of the media content in accordance with the public interest defined by the Law. Recommendations from our project should be included in the amendments to the Law. Some recommendations can be implemented by amending the by-law, i.e. the Rulebook on project-based co-financing of public interest in the field of public information, and the Ministry of Culture and Information of the Republic of Serbia is responsible for this document.
2. Amendments to the laws should require the authorities organizing public calls for financing the public interest in the field of public information to deliver data to the Open Data Portal, in a machine-readable format.
3. The Ministry of Culture and Information should amend the Rulebook on project-based co-financing of public interest in the field of public information to precisely specify which data should be contained in the decision on the allocation of funds. This data should correspond to the data submitted to the Open Data Portal. We recommend that the resolutions contain the following information: project applicant, identification number of the project applicant, name of the media outlet (in case of production, the name of the media outlet or names of media outlets publishing or broadcasting certain content), media registration number, project name, thematic framework, requested amount, amount obtained.
4. The Ministry of Culture and Information should amend the Rulebook on project-based co-financing of public interest in the field of public information to ensure that short descriptions (from the forms) of approved and rejected project proposals are found in the decisions on the allocation of funds, in order to facilitate the definition and verification of the thematic framework.
5. By amending the law, ensure that all documents related to public call procedures, including narrative and financial reports on implemented projects, are publicly available.
6. The Ministry of Culture and Information should amend the Rulebook on project-based co-financing of public interest in the field of public information to unify the thematic frameworks of approved projects in accordance with the public interest in the media sphere defined by the Law on Public Information and Media. This set of topics should not be a limiting factor, and a thematic framework “other” should be provided as well.
7. It is necessary to organize training sessions for representatives of government bodies who organise public calls for the development of a similar application, if they want to visually present data on project-based co-financing in their local community.
8. It is recommended that at all levels of government, for the purpose of “affirmative action”, separate public calls be organised for members of national minorities, in accordance with the representation of the minority population on the territory of a certain local self-government.
9. Although this was not the topic of our project, but for the sake of greater transparency, the Ministry of Culture and Information, by amending the Rulebook on project-based co-financing of public interest in the field of public information, should stipulate that the Decision on appointing members of the commission contains information who proposed their appointment and a brief biography of the members of the commission.
10. For the purpose of full transparency of project-based co-financing of media content, it is necessary to support initiatives that imply that all media content produced through the implementation of the project be accessible to citizens, preferably on one portal.



As part of this project implementation, we have developed a [web application](https://centarzaodrzivezajednice.shinyapps.io/Projektno_sufinansiranje_medija_u_Srbiji/) that will allow the search and analysis of the collected data in various ways, but will also allow downloading them in a functional format that will enable further work with them.

https://centarzaodrzivezajednice.shinyapps.io/Projektno_sufinansiranje_medija_u_Srbiji/