

**SHADOW REPORT ON ACHIEVED
RESULTS FROM THE DRAFT ACTION
PLAN FOR THE IMPLEMENTATION OF
THE STRATEGY FOR THE
DEVELOPMENT OF THE PUBLIC
INFORMATION SYSTEM IN THE
REPUBLIC OF SERBIA
UNTIL THE END OF 2025**

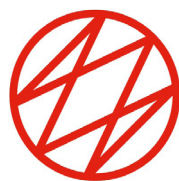
Authors: Tamara Filipović Stevanović **and** Rade Đurić

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



ASOCIJACIJA MEDIJA

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



**ASOCIJACIJA
ONLAJN
MEDIJA**

ASOCIJACIJA ONLAJN MEDIJA

Radanska 10, Niš
MB: 28178158
PIB: 109063306



NEZAVISNO UDRUŽENJE NOVINARA SRBIJE

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



LOKAL PRES

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

SHADOW REPORT ON ACHIEVED RESULTS FROM THE DRAFT ACTION PLAN FOR THE IMPLEMENTATION OF THE STRATEGY FOR THE DEVELOPMENT OF THE PUBLIC INFORMATION SYSTEM IN THE REPUBLIC OF SERBIA UNTIL THE END OF 2025

Action Plan for the Implementation of the Strategy for the Development of the Public Information System in the Republic of Serbia for the Period 2023-2025 represents a public policy instrument enabling the implementation of the general objectives and specific objectives defined under the Strategy for the period 2020-2025.

The general objective of the Strategy shall be an improved public information system through a harmonised positive legal framework that guarantees freedom of expression, media freedom, the safety of journalists, media pluralism, a developed media market, empowered journalists, educated citizens, and institutions capable of implementing regulations.

The specific objectives of the Strategy are as follows:

1. **Improved safety, socio-economic and professional working conditions for journalists and media workers;**
2. **Functional, sustainable and fair media market protected from political influence;**
3. **Functional, competent, professional and open institutions with mechanisms for protection from external pressures and consistent implementation of public policies and regulations;**
4. **Increased objectivity and diversification of sources and media content in the national minority languages;**
5. **Improved media literacy.**

The Ministry of Information and Telecommunications has established a Working Group for the development and monitoring of the implementation of the Action Plan, composed of representatives of relevant ministries, provincial authorities, regulatory bodies, media and journalist associations, as well as other institutions. Dejan Stojanović was appointed as the Head of the Working Group. The working group held 12 meetings in consultation with the institutions designated as the holders of specific measures.

The Working Group worked intensively on preparing the draft Action Plan in the first four months of 2024, after the new Government was elected on 2 May 2024. The Action plan was then submitted to a public consultation, which lasted from 12 June until 2 July, within the statutory minimum period of 20 days. The only public meeting in the scope of the discussion was held on 24 June. However, the Report on the conducted public consultation was never published, and the adoption of the Action Plan was never included in the agenda of the Government of the Republic of Serbia, despite multiple public announcements by Minister Dejan Ristić.

Although the Action Plan was not adopted, the Ministry has simultaneously initiated the process of amending three key media laws: The Law on Public Media Services, the Law on Public Information and Media and the Law on Electronic Media. The working group for drafting amendments to **the Law on Public Media Services** was formed in September and completed its work in early December 2024. The public consultation on the draft law was conducted during the New Year and Christmas holidays, from 27 December 2024 to 16 January 2025, also within the statutory minimum period.

During the public consultation, more than 50 amendments were submitted to the proposed text, but only four changes were adopted - and these were just technical corrections to the names of individual institutions. The proposed draft law does not resolve the issue of financing public media services. On the contrary, it cements their financial dependence on the budget decisions of the executive government. Although the media strategy explicitly envisages a stable funding model through fees as the primary source of income, the Ministry has rejected all proposals that would ensure the financial and editorial independence of public services. The argument that “the lack of funds will be compensated from the budget” is directly contrary to the goal of preserving the independence of the public broadcaster and opens up space for political influence and manipulation.

In addition, numerous participants in the public consultation pointed out that the introduction of the term “national” instead of “republic” public broadcaster is not a mere technical change, but potentially bears discriminatory and politically sensitive connotations. The Ministry also rejected this objection from the expert community, explaining that the submitters “misinterpret the word national” and that the term “republic” is outdated – even though this term is fully in line with the Constitution and the applicable legal framework of the Republic of Serbia.

The process of amending the **Law on Public Information and Media**, which began only in December 2024, was carried out with serious procedural and substantive shortcomings. Although the European Commission submitted specific recommendations for law improvement back in October 2023 – including protecting editorial independence, preventing the return of state ownership of media, and strengthening media pluralism – the process began with significant delay and under the pressure of tight deadlines.

Some of the key problems are:

Insufficient time for discussion: The Working Group members received proposals for amended provisions in a short period of time, which made a serious and reasoned discussion impossible.

Non-Transparency: The Working Group was not open to the public, despite proposals to provide insight into the process and participation of the wider professional community.

Ignoring the strategic framework: The current provisions, such as Articles 39 and 41, which enable the state to hold indirect ownership in the media, are inconsistent with the objectives of the Media Strategy, particularly its goal of depoliticising the media market.

Limited participation of relevant stakeholders: Independent media experts and representatives of relevant journalistic and media organisations were not included in the process.

The lack of transparency, the exclusion of critical voices, and the disregard for the European Commission’s recommendations have raised doubts about the process’s alignment with European standards and eroded trust in the media system reform.

The amendments to **the Law on Electronic Media** were initiated and finalised in December 2024 within a very short timeframe, without the involvement of relevant journalistic and media associations. The first working group meetings took place on 5 December in Belgrade, and on 21 December, the draft Law on Amendments to the Law on Electronic Media, along with the draft Law on Public Information and Media, were submitted to the European Commission for feedback. Somewhat later, on 24 December, the draft amendments to the Law on Public Media Broadcasters were sent in the same way.

The drafts of the Law on Electronic Media and the Law on Public Information and Media were never published or subjected to public consultation, despite the legal requirement. The entire process was conducted behind closed doors and came to an abrupt halt once the documents were submitted to the European Commission, with no involvement from experts or concerned public.

The public consultation on amendments to the **Law on Free Access to Information of Public Importance** was concluded by the end of December 2024, but the drafting and adoption of the Draft Law were plagued by numerous structural and procedural issues from the start.

Along with the tight deadlines, concern was raised about the composition of the Working Group, which included only representatives of public authorities, excluding media, academic, civil society, and legal professionals—key stakeholders who are among the most frequent and relevant beneficiaries of the law. The lack of inclusivity and transparency led to the rejection of most of the comments received during the public consultation, including proposals to expand the scope of the amendments to other systemic problems in the implementation of the law.

Although the amendments were initiated with the aim of addressing the issue of abuse of rights—specifically for cases in which requests for information were made not in the public interest but to collect costs—the proposed solutions failed to adequately tackle this problem and were not aligned with the standards for protecting the public's right to know. Within the context of institutional weaknesses and frequently politicised access to information, the introduction of the 'abuse of rights' concept carries the risk of further restricting access to the information of public interest, particularly for journalists, activists, and organisations working in the public interest.

In addition to the issue of abuse, the public consultation also highlighted many other persistent problems that hinder the effective implementation of the law:

- Failure of public authorities to meet their obligations (e.g., updating work-related information, submitting reports to the Commissioner),
- Ineffective oversight by inspectors,
- Legal inaccessibility of proceedings against the highest authorities (Government, President, National Assembly),
- The position of officials responsible for handling requests is unfavourable.

Although the Government adopted the Draft Law on 13 February 2025, it was withdrawn from parliamentary procedure the following week, which can be interpreted as an opportunity to revise the process. The withdrawal of the Draft Law paves the way for a more systematic and transparent approach to drafting amendments, one that includes a thorough analysis of the implementation of existing provisions and the active involvement of all stakeholders—such as the civil sector, media, academic community, and bar associations.

If the process goes on in a way that prioritises the needs of law beneficiaries over institutional interests, it has the potential to enhance the right to access information and strengthen the accountability of public authorities in line with democratic standards and the public interest.

As part of monitoring the implementation of the Media Strategy Action Plan, significant concerns were raised regarding the method used to appoint the new members of the Council of the Regulatory Authority for Electronic Media (REM). The REM Council officially dissolved on 4 November 2024, and the public competition for nominating candidates was not announced until 29 November, exceeding the statutory deadline and disrupting institutional continuity. The withdrawal of several credible candidates further destabilised the process, raising additional doubts about the legitimacy of the election procedure.

The situation was further aggravated by the fact that four prominent organisations—the Slavko Ćuruvija Foundation, IJAS, IJAV, and CRTA—filed criminal charges against the chairwoman of the Parliamentary Culture and Information Committee, alleging abuse of official position and illegal actions in the election process. The charges alleged that the chairwoman of the committee, in violation of the law, on her own rejected candidates who met the formal requirements, thereby hindering the Committee’s ability to make decisions in the scope of its powers.

This further undermined the process’s credibility and raised concerns about the potential for political manipulation of the regulatory mechanism.

According to the National Convention on the European Union assessment, this conduct has significantly damaged Serbia’s credibility in meeting its obligations under negotiation chapter 23 and the Reform Agenda concerning the use of funds from the EU Growth Plan. Should the appointment end based on such a controversial procedure, the new composition of the REM Council would lack the necessary institutional and democratic legitimacy, undermining its capacity to protect media freedoms and implement ODIHR recommendations. At the same time, such an outcome could not be considered a valid indicator of progress in implementing the Media Strategy—particularly in relation to specific objective 4, which focuses on enhancing objectivity and the diversity of sources and media content in minority languages.

An analysis of the 2023–2025 Action Plan implementation reveals significant shortcomings in achieving the established goals. Out of the 20 defined success indicators, setbacks were recorded in 11, signalling regression in critical areas such as media freedom, journalist safety, media pluralism, and institutional effectiveness. Data was unavailable for seven indicators, significantly undermining transparency and hindering a comprehensive evaluation of the results. In one case, stagnation was observed, while for another indicator, changes to the monitoring methodology further disrupted continuity in assessing progress. Although the Ministry of Information and Telecommunications stated in its annual work report that it would ‘prepare a final report and evaluation of the Strategy no later than six months after its implementation ends and submit it to the Government of the Republic of Serbia,’ the Report did not address the process of drafting the new Action Plan nor provide any data on the current status of the Strategy’s implementation. These findings indicate that there is a serious gap between the planned strategic goals and the actual state of affairs in the field of public information, which requires a revision of the approach, strengthening of monitoring mechanisms, and greater participation of the professional community in all stages of the process.

VI. ACTION PLAN TABLE

Public policy document:	Strategy for the Development of the Public Information System in the Republic of Serbia for the Period 2020-2025
Action Plan:	Action Plan for the Implementation of the Strategy for the Development of the Public Information System in the Republic of Serbia for the Period 2020-2025 in the period 2024-2025
Coordination and reporting	Ministry of Information and Telecommunications / Department for Information and Media

General objective: Improved public information system through a harmonised positive legal framework that guarantees freedom of expression, media freedom, the safety of journalists, media pluralism, developed media market, empowered journalists, citizens who are educated and institutions capable of implementing regulations;							
Institution responsible for monitoring and supervising the implementation: Ministry of Information and Telecommunications							
Indicator(s) at the level of the general objective (outcome indicator)	Unit of measure	Source of verification	Baseline	Base year	Achieved value in 2024	Target value in the last AP year	Final year of AP validity
The Republic of Serbia's progress from the Annual Progress Report in part related to media freedom and freedom of expression	No progress/ Limited progress / some progress	Annual Progress Report for Serbia	Limited progress	2023	No progress recorded ¹	Some progress	2025
Media Freedom Index	Republic of Serbia's position in the ranking list	Reporters Without Borders Report	91	2023	98 ²	Improving the position by five to ten ranks on an annual basis	2025
The Republic of Serbia's progress in the part of the Progress Report referring to the freedom of expression	Score (0 to 4)	Freedom in the World Report	2	2022	2 ³	3	2025

¹ Republika Srbija Izveštaj Evropske komisije za 2024. godinu, str 7

² Indeks Reportera bez granica za 2024. godinu

³ Izveštaj Freedom House za Srbiju za 2024. godinu

Specific objective 1: Improved safety, socio-economic and professional working conditions for journalists and media workers;						
Institution responsible for monitoring and supervising the implementation: Ministry of Information and Telecommunications						
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2024 / achieved value	Target value in the last year AP 2025 year
Increase in the number of prosecutorial actions and decisions regarding criminal offences and events of a criminal nature, reported to the prosecutor's office and directed against journalists and media workers.	0-No 1-Yes	Report of the Supreme Public Prosecutor's Office	182	2023	YES / NO 62 registered cases in the prosecutor's office database ⁴	YES
Increase in the percentage of judgments adopted in cases involving criminal offences and incidents targeting journalists and media workers.	Percentage	Supreme Court of Serbia Report	Not known	2023	Out of 62 established cases, only one judgment was adopted, resulting in a conviction, which represents 2%. In comparison, in 2023, 13 judgments out of 76 established cases were adjudicated, accounting for 17% ⁵	
Progress in examining the facts revealed in the investigations conducted relating to the murders of journalists.	No progress/ progress to some extent/ progress achieved	Report of the Commission for examining the facts revealed in the investigations conducted relating to the murders of journalists.	No progress	2023	The Commission has not met for more than a year	Progress achieved

⁴ Statistički podaci o postupanju javnih tužilaštava u krivičnim predmetima na štetu bezbednosti lica koja obavljaju poslove od javnog značaja u oblasti informisanja 2016-2025 str. 6

⁵ Ibid

Specific objective 2: A functional, sustainable and fair media market protected from political influence has been established;						
Institution responsible for monitoring and supervising the implementation: Ministry of Information and Telecommunications						
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2024 / achieved value	Target value in the final year of AP in 2025
Media Sustainability Index	Score (1 to 40)	IREX Annual Report	15	2023	20 / 13 ⁶	25
Audience concentration, vertical concentration and political control over media financing	High Risk / Medium Risk / Low Risk	Media Ownership Monitor Survey	High risk	2023	High risk / no new data for 2024	Medium Risk
Regulatory provisions for the prevention of concentration, regulatory provisions for vertical concentration, transparency of ownership and political control over media outlets in which the state holds ownership rights	High Risk / Medium Risk / Low Risk	Media Ownership Monitor Survey	Medium Risk	2023	Medium risk / no new data for 2024	Low risk
Political control over infrastructure	High Risk / Medium Risk / Low Risk	Media Ownership Monitor Survey	Medium to High Risk	2023	Medium to High Risk / no new data for 2024	Medium Risk
Internet neutrality in distribution networks	High Risk / Medium Risk / Low Risk	Media Ownership Monitor Survey	Low risk	2023	Low Risk / no new data for 2024	Low risk

⁶ Vibrant Information Barometer ctp 2.

Specific objective 3: Functional, competent, professional and open institutions with mechanisms for protection from external pressures and consistent implementation of public policies and regulations;						
Institution responsible for monitoring and supervising the implementation: Ministry of Information and Telecommunications						
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2024	Target value in the final year of AP in 2025
Unenforced decisions of the Office of the Commissioner for Information of Public Importance and Personal Data Protection among journalist's appeals	Number	Unenforced decisions of the Office of the Commissioner for Information of Public Importance and Personal Data Protection	2	2023	0 / 23 ⁷	0

Specific objective 4: High-quality, pluralistic and diverse media content that meets the information needs of different social groups ;						
Institution responsible for monitoring and supervising the implementation: Ministry of Information and Telecommunications						
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2024	Target value in the final year of AP in 2025
Media Sustainability Index in the part related to the media content plurality	Score (0 to 40)	IREX Annual Report in part related to the Information Quality	13	2023	14 / 12 ⁸	15
Imposed measures by the Regulatory Authority for Electronic Media (REM)	Reprimand / Warning / Ban on broadcasting	REM's Report adopted in its entirety	2	2023	two reprimands, two temporary bans and one warning ⁹	1 warning
Measures imposed by the Complaints Commission of the Press Council for the violation of the provisions of the Serbian Journalists' Code of Ethics (Press Council)	Number	Press Council Annual Report	42	2023	38 / 69 ¹⁰	32
Number of Serbian Journalistic Code violations reported semi-annually	Number	Monitoring of the Journalists' Code of Ethics compliance in daily papers	4141 for the period July-December 2023	2023	3400 / 5978 ¹¹	3000

⁷ Pregled rešenja Poverenika donetih u 2024. godini koja nisu izvršena ili po kojima organ vlasti nije obavestio Poverenika da je postupio po nalogu iz rešenja

⁸ Vibrant Information Barometer str 2.

⁹ <https://rem.rs/sr/odluke/izrecene-mere>

¹⁰ Izveštaj o radu Saveta za štampu u 2024. godini

¹¹ Izveštaj o monitoringu poštovanja Kodeksa novinara Srbije u dnevnim novinama jul-dec 2024. str 3.

Specific objective 5: Improved professional knowledge and developed digital competencies of citizens, institutions, media, journalists and media workers in the media environment;						
Institution responsible for monitoring and supervising the implementation: Ministry of Information and Telecommunications						
Indicator(s) at the level of the specific objective (output indicator)	Unit of measure	Source of verification	Baseline	Base year	Target value in 2024	Target value in the final year of AP in 2025
Citizen's media literacy	Score (0 to 6)	CESID Annual Report	3,97	2022	No data	4,60
Citizen's digital literacy	Score (0 to 15)	CESID Annual Report	10,68	2022	No data	11,60
Digital competences of journalists media workers, and employees in institutions	Number of trainings	CERT Report maintains statistical data on the number of trainings	1	2023	2 / 2024 Report was not published	2
Citizen's digital competence	Procentage	Izveštaj Republičkog zavoda za statistiku	45,72% of individuals are computer literate 29,61 % of individuals demonstrate partial computer proficiency	2022	73,2% of persons aged between 16 to 74 have used the computer in the last three months ¹²	75,72% of individuals are computer literate 57,81 % of individuals demonstrate partial computer proficiency

¹² Istraživanje [Godišnje istraživanje o upotrebi informaciono-komunikacionih tehnologija u Republici Srbiji, 2024. godine](#), objavljeno 25.10.2024. godine.
Podaci nisu uporedivi jer je rađeno po novoj metodologiji Evrostat

REGULATIONS PROPOSED FOR AMENDMENT IN THE ACTION PLAN

No.	REGULATION	Competent Ministry	Deadline	Status
1.	LAW ON PUBLIC INFORMATION AND MEDIA	MINISTRY OF INFORMATION AND TELECOMMUNICATIONS	IV quarter of 2025	
2.4.5	A harmonised legal framework in the field of public information and media, aligned with EU acquis and international standards			Ongoing
2.	LAW ON ELECTRONIC MEDIA	MINISTRY OF INFORMATION AND TELECOMMUNICATIONS	IV quarter of 2025	
2.4.5	A harmonised legal framework in the field of public information and media, aligned with EU acquis and international standards			Ongoing
4.5.1	Regulate the procedures by which the Regulatory Authority for Electronic Media oversees activities during the election campaign period, ensuring comprehensive coverage of all aspects of election reporting (with particular emphasis on officials' campaigning), and establish more effective sanctions, including the adoption of swift and timely resolutions during the campaign.			Ongoing
3.	LAW ON PUBLIC MEDIA SERVICES	MINISTRY OF INFORMATION AND TELECOMMUNICATIONS	IV quarter of 2025	
3.3.2	Amendments to the regulations should mandate regular and transparent public reporting on the expenditure of funds.			Not done
3.3.2	Amendments to the regulations should establish clear criteria for appointing members of the Board of Directors and directors of public media services.			Not done
3.3.2	Amend the regulations to redefine the procedure for electing members of the Board of Directors, aiming to enhance the independence and competence of the management body.			Not done

No.	REGULATION	Competent Ministry	Deadline	Status
3.3.2	Amendments to the regulations should ensure legal guarantees of editorial autonomy, particularly for the news programme editorial team, safeguarding its full independence, including a clear separation of the editorial and management departments.			Not done
3.3.2	Amend the regulations to revise the method of selecting the Program Council, enabling this body to serve as an external monitor of the programme content of public media services and a genuine link between viewers and the bodies of public media services.			Not done
3.3.2	Amendments to the regulations should mandate the election of a commissioner for professional standards and relations with users of public media services.			Not done
3.3.2	Amendments to the regulations should stipulate that only public media service bodies may participate in the process of electing and dismissing the general director, other directors, editors-in-chief, and editors-in-chiefs of public media services, by removing paragraph 10 of Article 23.			Not done
3.3.2	Amendments to the regulations should ensure a guarantee of editorial autonomy, particularly for the news programme editorial team, safeguarding its full independence.			Not done
4.3.5	Amendments to the regulations should mandate public media services to preserve the cultural and linguistic identity of Serbs abroad.			Not done
4.	CRIMINAL PROCEDURE CODE	MINISTRY OF JUSTICE	IV quarter of 2025	
1.3.4	Amend the regulations to define journalists as persons who, due to their duty to maintain professional secrecy, are exempt from the duty to testify if their testimony would violate the duty to maintain professional secret.			Not done
5.	LAW ON NATIONAL MINORITIES COUNCILS	MINISTRY OF HUMAN AND MINORITY RIGHTS AND SOCIAL DIALOGUE	IV quarter of 2025	
3.3.3	Amendments to the regulations should assure that only public media service bodies may participate in the process of electing and dismissing the general director, other directors, editors-in-chief, and editors-in-chiefs of public media services, by removing paragraph 4 of Article 21.			Not done

No.	REGULATION	Competent Ministry	Deadline	Status
6.	LAW ON FREE ACCESS TO INFORMATION OF PUBLIC IMPORTANCE	MINISTRY OF PUBLIC ADMINISTRATION AND LOCAL SELF-GOVERNMENT	IV quarter of 2025	
3.4.1	Consider and submit an initiative to amend the Law on Free Access to Information of Public Importance, which relates to resolving the problem of misuse in relation to submitting requests for free access to information of public importance.			Not done
7.	LAW ON COPYRIGHT AND RELATED RIGHTS	MINISTRY OF ECONOMY	IV quarter of 2025	
3.5.3	Amendments to the regulations should provide for a more flexible model for submitting data on the exploitation of copyright and related rights in a facilitated manner for users and without generating unnecessary additional costs, which would be in line with the Regulation on the manner of keeping electronic records of broadcasting and rebroadcasting of copyright-protected works.			Not done
3.5.3	Amendments to the regulations should prescribe the basic elements of the minimum tariff for the exploitation of copyright and related rights, not exceeding the nominal amount higher than the basic tariff.			Not done
3.5.3	Amendments to the regulation should redefine the role of organisations responsible for the collective management of copyright and related rights, and enable rightsholders to freely organise in accordance with the provisions of Directive 2014/26/EU.			Not done
8.	LAW ON TEMPORARY REGULATION OF THE METHOD OF COLLECTION OF THE PUBLIC MEDIA SERVICE FEE	MINISTRY OF MINING AND ENERGY	IV quarter of 2024	
3.3.1	By repealing the Law on the Temporary Regulation of the Method of Collection of the Public Media Service Fee, ensure that the fee becomes the primary funding source for public media services to carry out their core activities.			Not done

Conclusions

1. **Insufficient implementation of strategic goals** - The analysis reveals that, out of 20 success indicators, 11 showed there was not progress, while data for seven indicators was unavailable. This highlights significant shortcomings in the implementation and monitoring of both the general and specific objectives of the media strategy.
2. **Insufficient institutional engagement** - Key institutions, including REM, the Commissioner, and the judiciary, have not ensured the consistent implementation of media policies and laws.
3. **Lack of transparency and inclusiveness** - Amendments to media laws and processes, such as the election of REM members, were made without public consultation or the involvement of the professional community, in violation of good governance standards and obligations arising from the European integration process.
4. **Limited access to data and inconsistent methodology** - The unavailability of data for more than a third of indicators and changes in monitoring methodology for some indicators make it impossible to systematically evaluate progress and prevent continuity in evaluating results.
5. **Formal fulfilment of obligations without substantial effects** - Activities such as submitting draft laws to the European Commission or electing REM members were carried out procedurally but in contradiction with democratic principles and without any real impact on the state of media freedoms.

Recommendations

- **Establish a functional, transparent, and inclusive system for monitoring** media strategies and action plans, ensuring regular data publication, public reporting, and the involvement of relevant organisations and experts in the evaluation process.
- **Ensure public consultation and transparency** at all stages of drafting media legislation, taking into account the recommendations of the European Commission, civil society, and the media community.
- **Guarantee the functionality and independence of the REM** through a lawful and transparent procedure for appointing members, in line with the obligations under Chapter 23 and the ODIHR recommendations.
- **Regularly harmonise the indicator monitoring methodology** to enable consistent measurement of progress, measures impact assessment and adequate planning of future activities.
- **Focus on effects, not just forms**, implement activities that genuinely contribute to the enhancement of media freedom, independence, and security, rather than merely fulfilling administrative requirements.

Recommendation for developing a new Strategy for the development of the public information system (2026–2030)

Given that the current Strategy expires at the end of 2025, it is essential to promptly begin developing a new media strategy that will be **fully aligned with the new European regulatory framework**, focusing primarily on:

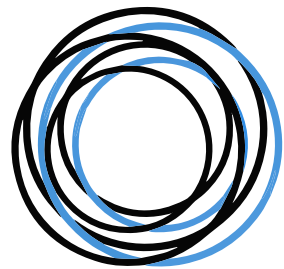
- **The European Media Freedom Act (EMFA)** - which stipulates the obligation to protect editorial and institutional independence, transparency of ownership and sources of funding, as well as the protection of journalists from political and economic pressures;
- **The Audiovisual Media Services Directive (AVMSD)** - which emphasises the role of independent regulatory bodies, the protection of minors, the promotion of media diversity and the improvement of media literacy;
- **Digital Services Act (DSA)** - which establishes new obligations for large online platforms concerning algorithm transparency, content moderation, commercial content disclosure, and user protection, with direct implications to the media environment and freedom of expression;
- **AI Act** - the first EU regulatory framework for artificial intelligence, setting criteria for the use of AI systems, including those in journalism, media production, and the editorial process;
- **Recommendations from the European Commission and the Council of Europe** on combating SLAPP lawsuits, protecting journalists, and ensuring digital security.

The new strategy should include:

- institutional guarantees of editorial and financial independence of public media services;
- strengthening the independence, transparency and accountability of REM and public media services;
- measures to prevent the concentration of media ownership and control over commercial influence;
- systemic and legal support for journalists, including in SLAPP proceedings;
- improving media and digital literacy in formal and non-formal education;
- the obligation to regularly evaluate the effects of media policies and strategies;
- analysis and definition of public policies regarding the application of AI in media and platform regulations in accordance with the DSA.

The drafting process should be:

- **Open, transparent and inclusive**, with the active participation of the media community, the academic sector and civil society organisations;
- **aimed at harmonisation with the EU acquis**, especially in the domain of media freedoms, digital services and technologies;
- **based on data, impact assessment and measurable objectives** to ensure sustainable implementation and adequate monitoring of results.



KOALICIJA
ZA SLOBODU MEDIJA



**#EY
ЗА ТЕБЕ**

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