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NORTH MACEDONIA Indicators on the Level of Media Freedom and Journalists' Safety Index 2024

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About the Project

BACKGROUND OF THE INDICATORS

Journalist associations from the Western Balkans, supported by the European Commission¹, have established the [Safejournalists.net](https://safejournalists.net) platform to jointly monitor media legislation and practice in their countries and to engage in improving the legal and institutional environment in which journalists and other media professionals work. Every year, based on a carefully designed methodology², [Safejournalists.net](https://safejournalists.net) partners conduct advocacy research, which provides journalist associations with reliable and relevant, evidence-based data on the main problems and obstacles in the implementation of EU standards in the area of media and journalists' freedom and safety in the Western Balkans. The research results give substance to partners' activities, providing them with new evidence and examples, which refine and strengthen their advocacy positions.

The first, qualitative research tool – *Indicators of the Level of Media Freedom and Journalists' Safety*, was first developed in 2016 and has been gradually fine-tuned over the years. It is composed of three groups of indicators: (A) Legal Protection, (B) Position of Journalists in the Newsroom, and (C) Journalists' Safety. Based on this monitoring tool, a total of seven assessments have been published, the last one was for 2022.

The quantitative research tool – *Journalists' Safety Index*, was developed in 2020 and tested in 2021. It is designed to "measure"

1 In December 2022, the European Commission approved a new three-year project cycle for the [Safejournalists.net](https://safejournalists.net) platform, which is a continuation of the previous two phases: the Regional Platform for Advocating Media Freedom and Journalists' Safety in the Western Balkans project (January 2016 – December 2018) and [Safejournalist.net](https://safejournalist.net) (February 2020 – March 2023). The main objective of the project is to strengthen the role of national journalist associations, members of the [Safejournalists.net](https://safejournalists.net) Platform, to become effective and accountable independent actors in advocacy and creating relevant media policies in their countries: Independent Journalists Association of Serbia, Association of BH Journalists, Croatian Journalists Association, Association of Journalists of Kosovo, Association of Journalists of Macedonia and the Trade Union of Media of Montenegro. The project is funded under the EU Civil Society Facility and Media Programme in favour of the Western Balkans and Turkey for 2021-2023 (IPA III).

2 The advocacy research was designed and coordinated by Snezana Trpevska and Igor Micevski, research associates of the Research Institute on Social Development RESIS, from North Macedonia – www.resis.mk.

changes in the environment that have a direct or indirect impact on how safe journalists and other media actors feel when practicing their profession. It is composed of four groups of indicators: (1) Legal and Organizational Environment, (2) Due Prevention, (3) Due Process and (4) Actual Safety. Based on this tool, a total of three research cycles were conducted: 2020 (pilot year), 2021 and 2022.

Starting in 2023, [Safejournalists.net](https://safejournalists.net) has combined both (qualitative and quantitative) research tools into a single advocacy research project – *Indicators on the level of media freedom and Journalists' Safety Index*. The platform monitors the situation in seven countries: Albania, Bosnia and Herzegovina, Croatia, North Macedonia, Montenegro, Kosovo³ and Serbia.

METHODOLOGICAL NOTE

The entire research process is divided into two phases: in the first phase, data is collected on all qualitative indicators – both for media freedoms and for the safety of journalists, while in the second phase, the qualitative indicators for the safety of journalists are converted into quantitative ones and the scoring and calculation procedure of the Journalists' Safety Index is carried out.

A range of various research methods were applied to collect and analyse data related to each qualitative indicator:

- Review of studies, analyses, research reports, policy papers, strategies and other documents;
- Qualitative analysis of legal documents;
- Searching and analysing information published on the websites of public institutions and other organizations and bodies;
- Searching and analyzing press releases, announcements, and other information produced by professional organizations;
- Secondary data collected from journalist associations;
- In-depth interviews with experts, journalists, policymakers, etc.;
- Focus groups with journalists, and
- Surveys with journalists (in some of the countries).

At the national level, advocacy research is conducted by national researchers who collect data and draft narrative reports, which are then reviewed by local media and legal

³ This name is without prejudice to status and is in accordance with United Nations Security Council Resolution 1244 and the opinion of the Tribunal on the Declaration and Independence of Kosovo.

experts and by the lead researcher. In the Republic of North Macedonia, the Association of Journalists of Macedonia (AJM) nominated Milan Spirovski as national researcher.

QUALITATIVE INDICATORS ON THE LEVEL OF MEDIA FREEDOM AND JOURNALISTS' SAFETY

The following table presents all qualitative indicators of the level of media freedom and safety of journalists, divided into three areas. These qualitative indicators are presented in descriptive, i.e., narrative form. The indicators used in the conceptual framework for the Journalists' Safety Index are highlighted in red in the table.

Overview of all qualitative indicators (Indicators for the level of media freedom and journalists' safety)

A. Legal safeguards and their implementation	B. Position of journalists in newsrooms	C. Journalists' safety
A.1 Basic guarantees for the freedom of the media and journalists and their application in practice	B.1 The job positions of journalists are stable and protected in the workplace	C.1 Journalists and media actors have access to immediate and effective protective measures when exposed to threats
A.2 Independence and efficiency of the regulatory authority	B.2 Editorial independence in private media	C.2 Journalists and other media actors (whose lives or physical integrity are at real and immediate risk) have access to special protection/safety mechanisms
A.3 Independence and autonomy of the public service media	B.3 Editorial independence of the public service media	C.3 Women journalists have access to legal measures and support mechanisms when facing gender-based threats, harassment and violence
A.4 Financial support for quality journalism and media content of public interest	B.4 Editorial independence in the not-for-profit media sector	C.4 The practice of regular public condemnation of threats and attacks against journalists and media has been established.
A.5 State advertising in the private media sector	B.5 Freedom of journalists in the process of news production	C.5 Police authorities are sensitive to the issue of protecting journalists
A.6 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	B.6 Economic situation of women journalists	C.6 Specialized investigative units and/or officers are equipped with expertise for investigating attacks and violence against journalists
A.7 Other laws are implemented objectively and allow journalists and other media actors to work freely and safely		C.7 Investigations into serious physical attacks on journalists and other media actors are conducted effectively (independently, thoroughly and promptly)
A.8 The confidentiality of journalists' sources is guaranteed in legislation and respected by the authorities		C.8 Journalists and other media actors are effectively protected from various forms of online harassment
A.9 Journalists are free to practice their profession and to establish, join and participate in their associations		C.9 Investigations into all types of attacks and violence against journalists and other media actors are conducted transparently
A.10 Right to access official documents and information		C.10 Quality statistics collection systems established by state authorities to stem impunity
		C.11 Non-physical threats and harassment
		C.12 Threats against the life and physical safety of journalists
		C.13 Actual attacks
		C.14 Threats and attacks on media and journalist associations

JOURNALISTS' SAFETY INDEX

Taking into consideration the standards and recommendations established by the Council of Europe and other international organizations, the concept of "journalists' safety"⁴ was effectuated, taking into account the following four dimensions:

- I. **Legal and organizational environment** – existence and implementation of legal protective measures relevant to the safety of journalists.
- II. **Due prevention** – the existence and implementation of a series of preventive measures, which have a direct impact on the protection and safety of journalists.
- III. **Due process** – the behavior of state institutions and public officials towards journalists and the efficiency of the criminal and civil justice systems in relation to investigations of threats and acts of violence against journalists.
- IV. **Actual safety** – incidents and cases of various forms of threats and acts of violence against journalists and media.

The table below presents the four dimensions and indicators that make up the theoretical model of the concept of "journalists' safety". Data for all these indicators were collected in the first phase of the research, and in the second phase, based on the evidence collected from the research, nine members of the Advisory Panel⁵ from each country assessed the situation and assigned points for each of the 19 indicators:

Overview of indicators related to the Journalists' Safety Index

I. Legal and organizational environment	II. Due prevention	III. Due process	IV. Actual safety
1.1 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	2.1 Journalists and media actors have access to immediate and effective protection measures when exposed to threats	3.1 Specialized investigative units and/or officers are equipped with expertise for investigating attacks and violence against journalists	4.1 Non-physical threats and harassment
1.2 The confidentiality of journalists' sources is guaranteed in legislation and respected by the authorities	2.2 Journalists and other media actors (whose lives or physical integrity are at real and immediate risk) have access to special protection/security mechanisms	3.2 Investigations into serious physical attacks on journalists and other media actors are conducted efficiently (independently, thoroughly and promptly)	4.2 Threats to the lives and physical safety of journalists
1.3 Other laws are enforced objectively and enable journalists and other media actors to work freely and safely	2.3 Women journalists have access to legal remedies and support mechanisms when facing gender-based threats, harassment and violence	3.3 Journalists and other media actors are effectively protected from various forms of online harassment	4.3 Actual attacks
1.4 Journalists are free to practice their profession and to establish, join and participate in their associations	2.4 The practice of regular public condemnation of threats and attacks against journalists and media has been established.	3.4 Investigations into all types of attacks and violence against journalists and other media actors are conducted transparently	4.4 Threats and attacks on media and journalist associations

4 Researchers at the RESIS Institute (www.resis.mk), Snezana Trpevska, Igor Micevski and Ljubinka Popovska-Tosheva, have developed the conceptual and methodological framework for the Index and the model for its assessment, weighting and calculation.

5 The members of the Advisory Panel in North Macedonia: Dejan Gjorgievski, Zoran Jovanoski, Ivana Krsteska Janevska, Igor Stojanov, Miroslava Simonovska, Rita Behadini, Sonja Rilkovska, Tamara Dichoska and Dzhumadije Ibraimi.

I. Legal and organizational environment	II. Due prevention	III. Due process	IV. Actual safety
1.5 The job positions of journalists is stable and protected in the workplace	2.5 Police authorities are sensitive to the journalists protection issue	3.5 Quality statistics collection systems established by state authorities to stem impunity	

N.B.: In this report, the masculine form is used as a gender-neutral form and refers to individuals of female, male, or other gender. Multiple designations are not used for the sake of better readability of the report.

— LIST OF ACRONYMS

AAVMS Agency for Audio and Audiovisual Media Services

SEC State Election Commission

MRTV Macedonian Radio and Television

AJM Association of Journalists of Macedonia

LCLID Law on Civil Liability for Insult and Defamation

IRL Investigative Reporting Laboratory

MISA Ministry of Information Society and Administration

MDT Ministry of Digital Transformation

MIM Macedonian Institute for Media

MIA Media Information Agency

RNM Republic of North Macedonia

ITUJMW Independent Trade Union of Journalists and Media Workers

CMEM Council of Media Ethics of Macedonia

Introduction

Country overview: The Republic of North Macedonia is a parliamentary democracy in which, after each election, the government is formed through a political symbiosis between the most successful parties from the Macedonian and Albanian blocs. The multiethnic composition of the country adds layers to the socio-political landscape, which is also reflected in the media sphere. According to the 2021 population and housing census⁶, the country has a population of 1,836,713. The ethnic map reveals that 58.44% are Macedonians, 24.30% Albanians, 3.86% Turks, 2.53% Roma, 0.47% Vlachs, 1.30% Serbs, 0.87% Bosniaks, and the rest are the smaller communities. Religious diversity, however, is reflected in the fact that 46.14% are Orthodox, 32.17% Muslim, 0.37% Catholic, and a small percentage declared themselves agnostics or members of other religious groups and communities.

Political context: The country continues to navigate the complex labyrinths of democratic development and Euro-Atlantic integration. 2024 was full of challenges for political parties in North Macedonia. The parliamentary elections themselves were a strong enough external jolt that led to various internal restructurings of political parties. In the country, the opposition party VMRO DPMNE took power in a coalition with the Albanian political coalition VLEN. The political scene was unstable due to the increasing division between the government and the opposition, and important issues such as European integration and relations with neighbors intensified that instability. These tensions also left their mark on the media landscape, where accusations of political pressures on editorial policies and selective reporting became more frequent. As a candidate country for membership in the European Union, N. Macedonia remains under the microscope of monitoring for the rule of law, media freedom and respect for human rights.

6 State Statistical Office of the Republic of North Macedonia, [2021 Population Census](#).

Economy: The economic landscape in 2024 was intertwined with global challenges and domestic economic turbulence. Inflation and the energy crisis strongly shook the general economic stability, and the consequences were also felt in the media sector. Many media outlets faced financial challenges, which resulted in a further decline in the socio-economic status of journalists and cuts in budgets for investigative journalism and quality reporting. The advertising market remained constrained, and a significant part of advertising funds were redirected to digital platforms, further reducing the revenues of traditional media. This economic instability paved the way for increased dependence of the media on political and corporate interests, putting their editorial independence to the test.

Regulatory environment: In 2024, the media sector in North Macedonia remained under strong economic and institutional pressure, with a potentially increased dependence on political subsidies, which further threatened editorial independence. The regulatory framework, led by AAVMS, continued to suffer from a lack of functional independence, and the public broadcaster MRTV, as in the case of AAVMS, remained with the previous management team, although the mandate of the members of the governing bodies of these two institutions has been expired for years. Despite certain legislative interventions, concerning the lifting of the moratorium on state advertising to restore the practice of state campaigns in private media, and the technical update of the Law on Media in the part of fines, substantial reforms of media laws did not take place. In its report⁷, the European Commission once again warned of the slow progress in media pluralism, underlining the need for urgent reforms to ensure a free and independent media scene.

7 European Commission, [Rule of Law Report 2024, Chapter on North Macedonia](#).





Media Freedom and Journalists' Safety in North Macedonia – Indicators

A. LEGAL SAFEGUARDS AND THEIR IMPLEMENTATION

– A.1 BASIC GUARANTEES FOR MEDIA AND JOURNALISTS' FREEDOM AND THEIR APPLICATION IN PRACTICE

The basic guarantees for freedom of expression and media independence, apart from the Constitution of N. Macedonia, are incorporated in the media and several other laws⁸. All of these laws also cover the right to access the internet, i.e. there is no separate regulation that regulates only the internet.

The right to freedom of expression, including in the online space, is freely exercised by citizens, journalists, media and other organizations. In 2024, there was not a single registered or documented case of a government or other state body attempting to block or filter internet content. This assessment is also supported by the fact that in 2024, the country went up in the Reporters Without Borders Index⁹, ranking 36th out of 180 countries, a 21 place increase compared to 2022. The report said that the overall environment was favorable for media freedom and allowed for critical reporting, although institutional transparency was relatively weak. However, there was a continued tendency for government officials to express negative and offensive attitudes toward journalists.

Reforms in the media sector, although long recognized as a need, have started in 2023. The EU-supported project *“Alignment of National Media Legislation with EU Acquis and Media Standards”* focused in its first phase on harmonization with the 2018 Audiovisual Services Directive, and in its second phase on a comprehensive reform of media legislation. Several analyses and proposals were prepared, but

8 These guarantees are incorporated into the Law on Media, the Law on Audio and Audiovisual Media Services, the Law on Free Access to Public Information, the Law on Civil Liability for Insult and Defamation, and other laws.

9 [Reporters Without Borders Annual Index – Republic of North Macedonia 2024.](#)

the process was interrupted due to the upcoming elections, as well as the government's decision to prioritize a partial solution related to reinstating of the possibility of "state" (or government) advertising in broadcast media. The new Ministry of Digital Transformation (MDT), established after the elections held in May 2024, as the competent institution for drafting media laws, was expected to continue the initiated process of comprehensive media reforms, but in the second half of the year this ministry initiated partial amendments only to the Law on Media, in order to include online portals in the law. By the end of 2024, the amendments had not been submitted for adoption to the Parliament and this legislative initiative was postponed until the following year.

There are no licenses or other strict requirements for establishing a print or online media outlet in this country. Print media outlets are subject to minimal regulation under the provisions of the Media Law, in terms of basic obligations for publicity in their operations, protection of information sources, protection of minors, prohibition of hate speech and incitement to violence, and several other obligations related to internal organization and necessary acts. Online media outlets, which are subject to general laws such as the Criminal Code, the Anti-Corruption Act, and others, are not covered by media legislation at all, i.e. their content is subject to self-regulation.

— A.2 INDEPENDENCE AND EFFICIENCY OF THE REGULATORY AUTHORITY

The mandate of the existing members of the Agency for Audio and Audiovisual Media Services (AAVMS) has long expired, since 2018 and then a seven-year mandate was envisaged, after two unsuccessful competitions in previous years for the selection of new members. In 2024, a third public competition was announced for the selection of members of the AAVMS Council. The public debate in the Assembly of the RNM took place in an atmosphere of limited transparency, because civil society representatives did not have the opportunity to ask questions of the candidates for members of the AAVMS Council, nor to participate in the procedure of their assessment and nomination. The Selection and Appointments Commission proposed a list of candidates — some of whom are affiliated with the ruling parties¹⁰ — without presenting clear and objective selection criteria. By the end of 2024, the vote for the new members of the AAVMS Council had not yet been put on the agenda in the Parliament due to the lack of political consensus among the ruling parties. This indicates continued attempts to politically influence the work of the regulator.

During the past year, no instances were observed where AAVMS made politically biased decisions or have acted unfairly and discriminatorily towards the media it supervises. According to the information available on the official AAVMS website, in 2024, based on the monitoring, AAVMS issued several public warnings to broadcasters and publishers of

10 [A complex political-party game for the new composition of the Media Agency](#), PRIZMA, 30.01.2025,

print media for various defaults on legal obligations. When granting licenses and enforcing the relevant by-laws in the audiovisual field, the regulator acted in a fair and neutral manner. However, with the amendments to Article 79 of the Law on Audio and Audiovisual Media Services, adopted in February 2024¹¹, the independence of the regulatory body is undermined, as it is deprived of the authority to decide on the renewal of licenses based on the broadcaster's contribution to program diversity and media pluralism in general¹². AAVMS continued to carry out its regulatory tasks, but with certain challenges related to political influence and legislative changes.

— A.3 INDEPENDENCE AND AUTONOMY OF THE PUBLIC SERVICE MEDIA

The autonomy and independence of the public broadcasting service, the Macedonian Radio and Television (MRTV), are partially guaranteed by the Law on Audio and Audiovisual Media Services (LAAVMS). The law contains a general provision guaranteeing the independence of MRTV from the state and other legal entities and bodies, but this guarantee is insufficient. There is no explicit provision that MRTV's news departments are independent and autonomous in program creation, although Article 61 guarantees the right to independence for editors and journalists. According to Article 104, journalists, editors and other employees involved in program production are not considered public servants, meaning that their employment, work and career advancement are not subject to the provisions of the Law on Public Sector Employees. However, in the past, MRTV required approval from three ministries, including the Ministry of Information Society and Administration, the Ministry of Labor and Social Policy and the Ministry of Finance, for these matters, which created pressure on the work of journalists and editors and called into question their editorial independence. To achieve full institutional autonomy for MRTV, additional amendments to other laws are also needed¹³.

Key to the autonomy of the public broadcaster is its stable and independent financing. With the amendments to Article 105 of the LAAVMS, adopted in July 2023, the funds for the operation and development of MRT are provided from the Budget, in the amount of 1% of the tax revenues collected, as per the latest final budget account¹⁴. This 1% is not intended only for MRTV, part of these funds go to Macedonian Radio Broadcasting and AAVMS. Although these legal amendments guarantee more stable financing, there are potential drawbacks. MRTV does not have a multi-year financial projection in its strategic plan¹⁵, which means that capital investments are not planned for more

11 [Law on Amendments to the Law on Audio and Audiovisual Media Services](#), (Official Gazette of the RNM No. 55/2024).

12 Not only has this criterion been deleted from Article 79, but an absurd provision has been inserted, implying that broadcasters are allowed to broadcast hate speech, call for the overthrow of the constitutional order, threaten national security, broadcast content harmful to the development of minors, and other harmful content. Namely, according to the new Article 79, the regulator cannot refuse to renew the license unless the broadcaster has committed such serious violations at least three times during the duration of the license.

13 All these issues are elaborated in detail in the analysis entitled "Overview of the legal framework of the public broadcasting service MRT in terms of role, competence, independence and financing, from the perspective of EU acquis and European media standards and practice". This analysis was submitted to the competent Ministry of Information Society and Administration in late 2023, by the expert team engaged in the project "[EU for Freedom of Expression: Harmonization of National Media Legislation with EU Acquis and European Media Standards](#)".

14 The funds are distributed as follows: 80 percent to MRT to cover the costs of creating and broadcasting programs and for technical and technological development, 15 percent to PE "Macedonian Broadcasting" for the maintenance, use and development of the public broadcasting network, and 5 percent to the Agency for Audio and Audiovisual Media Services.

15 Macedonian Radio and Television, "[Five-Year Strategy for the Development of MRTV](#)", Skopje, 2021.

than one year. Additional funds for technological development can, but do not have to be allocated from the Budget, which leaves room for arbitrary influence by the government. There is a risk that the new framework will not be enforced, which happened in 2023, when the Government did not apply the newly adopted formula. In 2023, instead of the legally planned 18.5 million euros, only 10.9 million euros were transferred, resulting in a debt of over 2 million euros for MRTV. In 2024, the total tax revenues amounted to 177.9 billion denars, which is 99.2% of the planned amount and it is an increase of 12.8% compared to 2023. According to the legal formula, MRT was supposed to receive about 1.78 billion denars (approximately 28.9 million euros).¹⁶ Additional information is needed from the competent institutions to determine whether the financing of MRT in 2024 was in accordance with the legal provisions.

The appointment of new members of the MRTV Program Council by the Parliament did not take place in 2024 either, due to the absence of political consensus among the main political parties. The law stipulates that these appointments require a two-thirds majority, but in the current political context it was not possible to gather such a majority and the election of this key body of MRT is at a standstill.

— A.4 FINANCIAL SUPPORT TO QUALITY JOURNALISM AND MEDIA CONTENT OF PUBLIC INTEREST

In 2024, the Government again announced a public call¹⁷ for support for the printing and distribution of general and news print media. The funds for this support amounted to 10 million denars, which is approximately the same as the amounts from previous years. The Commission for the distribution of funds was composed of representatives of relevant institutions, as well as one representative each from the Association for the Protection of National Print Media and the Association of Journalists of Macedonia (AJM). Of the total amount, 2 million denars were allocated to print media at the local level, while 8 million denars were allocated to national print media. AJM assessed that the process of funds distribution was fair, transparent and non-discriminatory.

There is still no Pluralism Fund in the country to support the production of media content of public interest, although there are initiatives to establish one. As part of the media reform project supported by the European Union in 2023, a draft of a new Media Law was prepared, which includes provisions for the creation of such a fund. In addition to this draft law, the AJM published a report¹⁸ with a special focus on the Media Content Pluralism Fund. In addition, the Report¹⁹ of the Media Freedom Assessment Mission offers concrete solutions applicable in the national context.

16 [Announcement of the Government](#) of the RNM, 13.01.2025.

17 [Public call for support](#) for printing and distribution of print media for 2024.

18 Association of Journalists of Macedonia, "[The Rights of Journalists, Freedom of Expression and Media Independence in North Macedonia – Metadata Report for 2023](#)", Skopje, 2024.

19 Association of Journalists of Macedonia, "[Media Freedom in North Macedonia: Fragile Progress](#)" Report of the Media Freedom Fact-finding Mission, Skopje 2024.

Apart from radio and television programs in the languages of the ethnic communities within the framework of the public broadcasting service, there are no other mechanisms for financing the media in the languages of the different ethnic communities. These media are not attractive to advertisers and have been facing financial difficulties for years. The lack of an appropriate media policy to address this problem reflects on the overall pluralistic picture of the media sector in N. Macedonia.

— A.5 STATE ADVERTISING IN THE PRIVATE MEDIA SECTOR

In February 2024, the Assembly of RNM passed amendments to the Law on Audio and Audiovisual Media Services, which lifted the ban on state advertising on private television and radio stations.²⁰ The amount that the state can allocate for this purpose was also determined: “0.1 percent of the state budget from the tax revenues determined in the last adopted final account of the Budget”. In addition, municipalities are obliged to conduct up to four media campaigns per year, financed with 0.5% of their annual tax revenues. Of the envisaged funds, 40 percent will be used by national television stations, 40 percent by cable and satellite television stations, 15 percent by regional and local television stations, and 5 percent by radio stations. Both the state and municipalities will be obliged to broadcast campaigns. y the time of the publication of this report, the new legal solution that reinstates the practice of state advertising in private audiovisual media had not yet been implemented in practice and will still be subject to observation. Journalist associations and several experts in the field of media policy completely opposed the lifting of the ban on state advertising because “a complex financial mechanism of ‘legalized’ outflow of public money to all private audiovisual media is being created, which ultimately puts them in a position of direct dependence on the authorities at the central and local levels.”²¹ The Association of Private Online Media also reacted to this legal solution because it completely excludes online media. The previous provision of Article 102 of the LAAVMS prohibited the planning of financing private media with state funds. For the purposes of this report, AJM submitted a written request to the Office of the Deputy Prime Minister in charge of the fight against corruption and promoting good governance, requesting information on whether state institutions regularly publish data on the amounts allocated to various media outlets in the country for 2024, but no response has been received by the time of publication of this report.

— A.6 LEGAL PROVISIONS RELATED TO DEFAMATION AND THEIR APPLICATION DO NOT CREATE A CHILLING EFFECT ON JOURNALISTS AND THE MEDIA

In 2024, the effects of the amendments to the Law on Civil Liability for Insult and Defamation, adopted in November 2022,

20 Maglesov, Vasko, “[The Parliament Reinstated State Advertisements in Private Media](#)”, Prizma, February 29, 2024.

21 Opinion of the experts engaged in the project “EU on Freedom of Expression: Harmonization of National Media Legislation with EU Acquis and European Media Standards”, regarding the additional amendments to the Law on Audio and Audiovisual Media Services submitted on November 2, 2023. The opinion was submitted to the Ministry of Information Society and Public Administration on November 6, 2023.

became more evident. The goal of these amendments – to reduce the envisaged amounts of non-pecuniary damage that the court can award so as not to negatively affect free and critical journalism – proved to be justified. The law guarantees freedom of expression, and the restrictions are in accordance with Article 10 of the European Convention for the Protection of Human Rights and Fundamental Freedoms and the case law of the European Court of Human Rights. According to data from the Basic Civil Court Skopje, in 2024 the number of defamation and insult lawsuits against journalists and/or media outlets went down to 15. This is a significant improvement compared to previous years and indicates a positive trend in the protection of journalistic freedom.

In September 2024, the Basic Civil Court – Skopje ruled in favor of journalist Dusica Mrdja, who was attacked while performing her duties on April 27, 2017 in the Assembly of the RNM. With this, the case of Dusica Mrdja received a final resolution, which has a positive effect on the entire context in which journalists work in the country. The verdict states that the state is obliged to compensate the journalist with compensation for non-pecuniary damage due to the fear suffered and for the violation of her right to freedom of expression. Although the country was ranked very high in 2024 according to media freedom, i.e. 36th out of 180 places, penalties for defamation and insult were drastically reduced and a special public prosecutor for the rights of journalists was appointed, journalists and media workers still have their doubts on whether the positive trend will continue. The reason for such fears is also the defamation verdict handed down in 2023 against the IRL editorial team in the dispute with businessman Kocho Angjushev, in which the IRL editorial team's status as a media outlet was challenged, and it is said that IRL journalists are "so-called journalists", that their work cannot be public and that state institutions should review their work²². However, it is important to add that, following a complaint filed by AJM²³, in October 2024, the judge who made this verdict was publicly reprimanded by the Judicial Council of RNM²⁴. Because of this case, the prevailing opinion among critical journalists is that the pressures in recent years have come more from the business elite than from political powerbrokers.

— A.7 OTHER LAWS ARE ENFORCED OBJECTIVELY AND ALLOW JOURNALISTS AND OTHER MEDIA ACTORS TO WORK FREELY AND SAFELY

In the country, there is no effective legal protection against so-called strategic lawsuits against public participation (SLAPPs) that aim to put pressure on critical media or journalists by financially draining them. However, this does not mean that the defendants in such processes are left without protection, but rather they exercise their rights, i.e. protection, within the framework of existing positive law. These cases, of whatever nature, gravitate around several

22 Jovanovska, Slobodanka. "The Truth or Business Interests: Who Wants to Silence Journalists with SLAPPs?" AJM, 27.12.2024.

23 AJM: Written submission to the Judicial Council for Judge Spirovska Paneva for unfair exclusion of the public from the hearing, 19.10.2023.

24 The Judicial Council decided upon the written submission of AJM: public reprimand for judge Spirovska Paneva, 22.10.2024.

procedural and substantive laws, such as the Law on Civil Procedure (LCP), the Law on Obligations (LOO) and the Law on Civil Liability for Insult and Defamation (LCLID)²⁵. In terms of special protective mechanisms of a procedural nature, there are no special provisions in the LCLID, except for the general provisions relating to the initiation of proceedings.

In 2024, increased pressure was observed on some investigative journalists by the business elite, which was manifested through an increased number of strategic lawsuits against public participation (SLAPPs). According to AJM statistics for the last four years, there is a clear trend of increased use of SLAPPs as a means of intimidation and pressure on investigative journalism: in 2021, 4 cases of SLAPPs were recorded against journalists from various media outlets, filed by former officials and representatives of political parties; in 2022, 5 lawsuits were recorded, all directed against one media outlet that published a series of investigative stories related to health and business topics. The plaintiffs were representatives of foreign and domestic companies, as well as a private healthcare institution. In 2023, court proceedings continued following previously filed lawsuits, and some of them were followed by prosecutorial activities and hearings. In 2024, 8 new SLAPPs/criminal charges were registered, filed by institutions, business entities, religious communities and representatives of political parties against journalists, media outlets and editors due to published content of public interest.

In 2024, no examples of arbitrary or discriminatory application of other laws were observed that aimed at limiting the freedom of journalistic work or burden the media with advocacy costs.

— A.8 THE CONFIDENTIALITY OF JOURNALISTS' SOURCES IS GUARANTEED IN LEGISLATION AND RESPECTED BY THE AUTHORITIES

The protection of journalistic sources is guaranteed and regulated in detail in the Constitution of the Republic of Macedonia and in several laws: the Law on Media, the Law on Audio and Audiovisual Media Services, the Law on Civil Liability for Insult and Defamation, the Criminal Code and the Law on Protection of Whistleblowers. During 2024, the provisions of these laws were respected, i.e. AJM did not observe any cases of journalists' right to protection of sources being restricted.

During 2024, AJM did not register any reports of pressure on journalists to reveal their confidential sources, and journalists working on investigative articles felt free to contact their sources. However, the number of individuals reporting corruption cases to the competent authorities and to journalists is still low, although the Law on the Protection of Whistleblowers guarantees the rights of whistleblowers and regulates protected reporting. In this sense, journalistic sources are encouraged and

25 Zharko Aleksov and Zharko Hadzi-Zafirov, "[ANALYSIS – How to achieve more effective protection from strategic lawsuits against public participation \(SLAPPs\) ?](#)", Association of Journalists of Macedonia, Skopje 2024.

are institutionally better protected, but due to pressures and fear for their jobs, people rarely dare to use this mechanism.

— A.9 JOURNALISTS ARE FREE TO DO THEIR JOB AND TO ESTABLISH, JOIN AND PARTICIPATE IN THEIR ASSOCIATIONS

The journalistic profession is not subject to licensing, and there have been no attempts by the state to introduce any conditions for someone to be able to work as a journalist. The provisions of the Media Law are already outdated, especially in terms of the restrictive definition of the term journalist²⁶. Journalists are free to organize themselves in their own associations. During 2024, there were no obstacles or significant political pressures on journalist associations. AJM is the leading journalist association, operating since 1946 and is a member of the International Federation of Journalists and the European Federation of Journalists. AJM is a membership organization. At the end of 2024, the Association of Journalists of Macedonia (AJM) had 433 registered active members. Membership fees are paid on a biennial basis. Two other member organizations are also actively working: the Independent Union of Journalists and Media Workers (ITUJMW) and the Council for Media Ethics (CMEM).

— A.10 RIGHT TO ACCESS OFFICIAL DOCUMENTS AND INFORMATION

As of December 2024, 354 complaints from information seekers had been submitted to the Agency for the Protection of Free Access to Public Information, of which 36 were from journalists. This data confirms that the provisions of this Law were used less by journalists and media workers compared to last year, when out of 454 complaints, 37 were from journalists. However, investigative journalists emphasize that, unlike before, the Agency's officials show much greater understanding and offer assistance to journalists in using the Law. With the amendments to the Law, from May 2019, the deadlines for institutions to respond to requests for access to information were shortened, which was particularly important for journalists. The provisions of this Law are most often used by journalists working in the field of investigative journalism, but they also complain that institutions often do not meet the deadlines. In the second half of 2024, at the request of the Ministry of Justice, a working group was formed to amend this law, and representatives of the AJM are among the active members of the group. It is expected that in the first half of 2025, the new proposal will be presented to the members of the Parliament.

According to previous analyses by AJM²⁷, journalists believe that the judiciary is more open and transparent than in the past. These positive developments, however, are not due to a systemic improvement, an adopted strategy or an implemented

26 Law on Media (Article 2), in Article 2 of the "Law on Media", the term journalist is defined as "a person who collects, analyzes, processes or classifies information published in the media and is employed by the media or has a work contract with them, or a person who carries out journalistic activities as an independent profession (freelance journalist)".

27 Pashovski, Davor, "Journalists' Views and Perceptions on the Transparency of the Judiciary in North Macedonia", Association of Journalists of Macedonia, Skopje, 2021.

reform aimed at increasing the transparency and publicity of the judiciary, but rather to a personal decision of individuals to increase the level of transparency in the work of the institutions they represent. Despite the fact that AJM has made initiatives in previous years, in discussions with some of the judicial authorities, to create a public register of attacks on journalists, such a practice has not yet been established²⁸. In order to promote transparency, AJM has, for years, also pointed out the need to establish a register of spokespersons for judicial institutions, which should be publicly available on the websites of the courts and on the website www.sud.mk.

Journalists reporting from the RNM Assembly are not fully and objectively informed by the coordinators of the parliamentary groups about the execution of the planned activities, especially about disagreements between the government and the opposition or between the President of the Assembly and a particular parliamentary group. At the beginning of 2024, the production of new program content on the Parliamentary Channel officially began, and the parliamentary studio was also equipped, in which it is planned to record political debates that will be broadcast on the Parliamentary Channel²⁹.

28 Association of Journalists of Macedonia, "Media Freedom in North Macedonia: Fragile Progress", Report of the Media Freedom Fact-finding Mission, Skopje, 2024.

29 See more on the [Parliament's](#) website.

B. POSITION OF JOURNALISTS IN NEWSROOMS

— B.1 THE JOB POSITIONS OF JOURNALISTS ARE STABLE AND PROTECTED IN THE WORKPLACE.

In terms of job stability, research data shows that around 70% of journalists and media workers had permanent, full-time employment contracts, around 17% were engaged on fixed-term contracts, and 7% i.e., 9% on a piecework agreement or an author/publishing agreement, respectively ³⁰. Such temporary or unstable employment arrangements are more common in the online sector, followed by print media and private television.

Job strain, in terms of respecting the legally established number of working hours, is a greater problem in private media than in the public broadcasting service³¹. 28% of journalists and 14% of media workers work above the legally permitted limit. However, job strain seems to have the most negative impact on journalists' mental health. Over half (55%) stated that they very often or often felt stress from their work responsibilities. Among media workers, this percentage is lower (31%)³².

However, in the workplace, the biggest problem is the valuation of and remuneration for the work of journalists and media workers. In 2023, about 50% of journalists and 77% of media workers had incomes below the average monthly salary in the RNM, which in that period (May-October 2023) amounted to 37,065.00 denars. It is quite likely that during 2024 the situation has worsened, given that few journalists confirm that salaries increases keep parallel to the increase of the average salary in the country. Another serious problem is that in many cases the media do not pay employees compensation for overtime work or work on national holidays. For example, 46% of the total number of respondents in 2023 were never or rarely paid compensation for working on holidays.

In the country, ITUJMW is the only national trade union that unites journalists and media workers in the country. ITUJMW was formed in 2010 and is a full member of the International Federation of Journalists (which unites journalist unions from all over the world), as well as the European Federation of Journalists. At the end of 2024, ITUJMW had over 400 active members. Last year, subtle pressures were registered on the leadership and members of ITUJMW, related to the membership of journalists in the union, but also to the position of ITUJMW against the lifting of the ban on state advertising in private audiovisual media.

There is no general collective agreement signed to protect the rights of journalists in private media. ITUJMW has signed a collective agreement only with the state-owned Media Information Agency (MIA)³³.

30 Trpevska, Snezana, "[Working conditions in the media sector: "Professional status and labor rights of journalists and media workers"](#)", ITUJMW, RESIS Institute, Skopje, 2024.

31 Ibid , p.15.

32 Ibid , p.17.

33 Interview with Darko Duridanski, project coordinator at the Independent Trade Union of Journalists and Media Workers (ITUJMW), March 4, 2025.

— B.2 EDITORIAL INDEPENDENCE IN PRIVATE MEDIA

There are no published data or overviews from which it can be determined how many private media outlets have internal organizational acts or rules, according to which the editorial staff is formally separated from the management of the media outlet. In larger media outlets, it is common for editorial offices to be separated from management structures. When it comes to smaller local media outlets, the situation is more complex, i.e. the pressures are expressed in a different way and come from both the owners and local powerful figures. From direct communication with journalists over the past year, it can be concluded that such documents rarely exist. There is no information on whether any of the private media outlets have adopted their own separate ethical codes or rules. The only code that applies to all professional journalists, in any media sector, is the Code of Journalists of Macedonia³⁴, adopted in 2001. The code is the basis for the actions of both the Council of Honor of the AJM and the Complaints Commission of the Council for Media Ethics (CMEM). CMEM has also adopted Guidelines for Ethical Reporting in Online Media, i.e. guidelines for the application of the Code of Journalists in the online sphere³⁵.

The connection between the owners of individual media outlets and the centers of power is often to the detriment of journalists working in these media outlets. At the focus group with journalists and media workers organized by AJM³⁶ for the needs of this report, participants emphasized that they do not report and do not know where to report pressures, threats and comments about them and their work.

“When it comes to pressures, we as journalists, except for AJM and ITUJMW, have nowhere to report that we are the target of such activities.”³⁷ Otherwise, pressures are most often not expressed as direct threats, but through a series of subtle ways of influencing, and especially through the instability of the working status of journalists and media workers.

— B.3 EDITORIAL INDEPENDENCE IN THE PUBLIC SERVICE MEDIA

In 2017, the national public broadcasting service (Macedonian Radio Television) adopted a Code of Ethics for Journalists³⁸, which applies to creative staff and all employees of MRT. The Code has been criticized by the journalistic community since the beginning due to its content, but also due to the lack of transparency in its preparation. The biggest shortcoming of the Code is the mixing of journalistic ethics with work discipline and the rights and obligations of journalists arising from the terms of employment. The Ethics Commission at MRT, which is responsible for monitoring compliance with the Code, has

34 Association of Journalists of Macedonia, “[Code of Ethics of Journalists of Macedonia](#)”.

35 Council of Media Ethics in Macedonia, “[Guidelines for Ethical Reporting in Online Media – Application of the Code of Ethics of Journalists in the Online Sphere](#)”.

36 Focus groups with journalists, conducted by Milan Spirovski on 26.12.2024 and 24.01.2025.

37 Statement by a media outlet editor, participant in a focus group held on December 26, 2024.

38 Macedonian Radio and Television, “[MRT Code of Ethics for Journalists, Creative Staff and All MRT Employees](#)”, Skopje, 2017.

not received a single complaint in the past period. In 2021, the AJM called for amendments to MRT's Code of Ethics and the establishment of procedures for submitting complaints and the method of functioning of the Ethics Commission, which should also be published on MRT's website. During 2024, MRT did not take any activities regarding this issue. The public broadcasting service MRT, in cooperation with professional media organizations and the expert public, should initiate amendments to the Code of Ethics for journalists, creative staff and all MRT employees in order to specify and update the content, adapt it to the online environment and strengthen the internal system of self-regulation³⁹.

In 2024, again no changes were made to the internal structure of the public broadcasting service, which should have been part of the media reform process, primarily due to the fact that the process of drafting new media laws did not continue. The experts engaged in the reform of the regulation proposed a series of changes in terms of strengthening the participatory model of public service, but even in 2024, the competent Ministry did not initiate a procedure for adopting these changes. MRT has adopted its own internal organizational acts, according to which the editorial offices are formally separated from the management structures. However, it is difficult to find information on the rules of the internal organizational structure and the operation of its organs and bodies on the MRT website.

MRTV is still not free from systemic political influences⁴⁰, although the existing regulation is designed to ensure the independence in the selection of MRT bodies and its stable and independent financing. In the past few years, including 2024, there has been no direct pressure from the government on the editorial offices or individual journalists, but rather structural forms of pressure: through the postponement of the selection of the new MRT bodies and through the continuous reduction of funds for financing the public service in recent years.

— B.4 EDITORIAL INDEPENDENCE IN THE NOT-FOR-PROFIT MEDIA SECTOR

Non-profit media in the country are underdeveloped, primarily due to the absence of policies to support and finance this sector⁴¹. Although the media regulator has adopted a separate policy⁴² for the development of the non-profit broadcasting sector, only four non-profit radio stations have been established so far – three are radio stations intended for student communities at state universities in Skopje (Radio Student FM), Shtip (UGD FM) and Bitola (UKLO FM), and one radio station is intended for a religious community in Strumica (Radio Marija Blagovest).

39 [It is necessary to Strengthen the Mechanisms and Promote Effectiveness](#) – Media self-regulation in RNM, Macedonian Institute for Media, 2023.

40 [Media Freedom in North Macedonia: Fragile Progress](#) – Report from the Media Freedom Fact-finding Mission, AJM, 2024.

41 Micevski, Igor, Trpevska, Snezana. "[Monitoring Media Pluralism in the Digital Age: Application of the Media Pluralism Monitor in the European Union, Albania, North Macedonia and Turkey – National Report: Republic of North Macedonia](#)", European University Institute, June, 2023.

42 Agency for Audio and Audiovisual Media Services, "[Concept for the Development of Non-Profit Broadcasting institutions](#)", December, 2015.

There are various types of non-profit media in the online sector in the country. Several independent newsrooms, which are registered as citizens' associations (civil society organizations), are engaged in investigative journalism: Prizma, IRL, 360 degrees, SCOOP Macedonia⁴³, etc. Other non-governmental organizations, as part of their program projects, have also established information media, intended for different audiences: Portalb, Radio Mof, Meta.mk, Jasno.mk, Lokal Aktiv⁴⁴, and others. The editorial offices of non-profit media are usually small and include several journalists, and their funding is unstable and unsustainable.

There is no specific code of conduct for journalists in the non-profit sector, but in December 2020, CMEM adopted Guidelines for Ethical Reporting in Online Media, which, in fact, elaborate in more detail the application of the basic ethical principles of the Code of Ethics of Journalists in the online sphere. In addition, CMEM and AJM established the Register of Professional Online Media⁴⁵ *Promedia*, which includes about 116 online news media outlets, including some non-profit ones. The majority of these media outlets have accepted the Code of Ethics and Guidelines for Ethical Reporting in Online Media, the implementation of which is ensured by CMEM⁴⁶. Although the pressure on non-profit media, especially those engaged in investigative journalism, has decreased compared to the period 10 years ago, when journalists and editors from these media were often discredited and harshly attacked in public for their critical texts towards the then government and powerful figures, the perception is that in the last three years there has been an increase in pressure again, especially visible through the filing of defamation and insult lawsuits.

— B.5 FREEDOM OF JOURNALISTS IN THE NEWS PRODUCTION PROCESS

Recently, a problem that journalists often highlight is the influence of some editors on their daily work, but this is not so direct and visible, meaning there is more self-censorship than direct pressure. The point is that, in the newsrooms, it is known in advance which topics are acceptable, that is, which topics the editor will accept and which ones they will reject. The journalists who were included in the research conducted for 2024⁴⁷ believe that they have freedom in choosing topics in the news production process: "Over the past year, at least in our newsroom, we have never had any obstructions or remarks regarding the topics that journalists are working on or

43 [Prizma](#) is a website of BIRN Macedonia, designed to promote and strengthen investigative journalism. [The Investigative Reporting Laboratory](#) (IRL) is a non-profit media organization, whose reporting focuses on corruption, crime and good governance. [SCOOP Macedonia](#) is a non-governmental and non-profit organization, whose goal is to promote, support and encourage investigative journalism.

44 [Portalb](#) is a non-profit media outlet in Albanian, founded by the NGO Innovative Media, which aims to advance journalistic practices. [Radio MOF](#) is a program activity of the Youth Educational Forum. [Meta.mk](#) is an independent news agency, which is a project of the Metamorphosis Foundation. [Jasno.mk](#) is a digital platform, founded by AJM, with the aim of raising awareness and strengthening the capacities of local communities to recognize disinformation, especially gender-based disinformation. [Lokal aktiv](#) is an online media outlet for local communities, including vulnerable groups of citizens and civil society organizations working with them, founded by the RESIS Institute in partnership with 22 civil society organizations from the [East and the the southeast region](#) and 10 civil society organizations from the [Vardar region](#).

45 Register of professional online media in the Republic of North Macedonia [PROMEDIA](#).

46 Council of Media Ethics in Macedonia, "[Guidelines for Ethical Reporting in Online Media – Application of the Code of Ethics of Journalists in the Online Sphere](#)".

47 Focus groups with journalists, conducted by Milan Spirovski on 26.12.2024 and 24.01.2025,

will work on, we have always been met with support⁴⁸." This especially applies to media outlets with larger newsrooms. However, choosing topics for reporting in regional and local media is a bigger problem for journalists." The reason for this problem is the small, i.e. tightly-knit community in which these media operate, the established clientelistic ties of the owners with mayors and other local powerful figures, as well as the poor financial situation in which these media outlets are."⁴⁹

Although the number of investigative media outlets is small, the political environment is now more conducive to investigative journalism. In general, journalists in North Macedonia work in a more open and free atmosphere than in the previous decade and feel freer to investigate and report on complex issues, such as corruption. However, there still appears to be a lot of self-censorship among the wider journalistic community due to fear of political or legal repercussions. According to an assessment made by several international experts, the state of independent journalism and editorial freedom remains problematic, as "...many media owners, especially in traditional media (national TV stations), have other core businesses, which often depend on tenders from ministries and institutions, creating implicit or explicit taboo topics"⁵⁰.

— B.6 ECONOMIC POSITION OF WOMEN JOURNALISTS

The results of the analyses and research conducted over the past two years⁵¹ show that the gender pay gap has almost been eliminated in the media sector, but low incomes remain a systemic challenge. More than half of journalists and a significant share of media workers earn below the average monthly salary at the state level, with the situation being particularly unfavorable in the private sector. While the regularity of payments is generally not a problem, the lack of compensation for overtime and holiday work remains widespread. The data also indicate that women are not in a subordinate position in terms of career development and representation in editorial positions, with almost equal gender representation in editorial structures, especially in the broadcasting sector⁵². These findings indicate the need to improve economic working conditions and consistent application of workers' rights in the media sector.

There is no recent research data on whether women journalists and media workers are exposed to attacks, pressures and harassment on the basis of gender. However, some women journalists state that in this environment they are often exposed to sexist comments, pressures or insults, simply because they are women⁵³. "The most common occurrence when publishing an investigative story or text in the context of threats

48 Statement by a woman journalist, participant in a focus group held on 24.01.2025.

49 Statement by a woman journalist-editor, participant in a focus group held on December 26, 2024.

50 Association of Journalists of Macedonia, "[Media Freedom in North Macedonia: Fragile Progress](#)", Report of the Media Freedom Fact-finding Mission, Skopje, 2024.

51 Trpevska, Snezana, "[Working conditions in the media sector: Professional status and labor rights of journalists and media workers](#)", ITUJMW, RESIS Institute, Skopje, 2024.

52 Agency for Audio and Audiovisual Media Services, "[Structure of Employees in the Audio and Audiovisual Media Industry in 2022](#)", August, 2023.

53 Focus groups with journalists, conducted by Milan Spirovski on 26.12.2024 and 24.01.2025.

and intimidation towards women journalists occurs on social media and it comes from anonymous men, and the comments are frighteningly derogatory, sexist and quite chauvinistic just because the author of that text or story is a woman."⁵⁴

According to the AJM Register of Violations of the Rights of Journalists and Media Workers, in 2024⁵⁵ there were two incidents registered, one of which occurred in June 2024 with journalist Lepa Dzundeva, and the other with journalist Miroslava Simonovska. Women journalists often suffer insults and belittling when reporting on sensitive topics. Qualifications that refer only to women are used, in a pejorative sense, based on prejudice and gender stereotypes⁵⁶, phenomena that indirectly reflect on their professional future and on their private lives.

54 Statement by a woman editor-journalist from a print and online media outlet for the purposes of this report, participant in a focus group on December 26, 2024.

55 [Register of cases of violation of the rights of journalists and media workers over the years](#), Association of Journalists of Macedonia.

56 Ibid.

C. JOURNALISTS' SAFETY

— C.1 JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES WHEN EXPOSED TO THREATS

In 2024, the Basic Public Prosecutor's Office appointed Dejan Petrevski as the competent prosecutor to monitor the handling of cases related to attacks on journalists. This initiative also includes the establishment of an open communications line, through which journalists can directly contact the prosecutor in the event of physical attacks, violence or threats to their life, either in person, via social media or via email. This measure is part of wider efforts to increase the safety of journalists and their protection from threats and attacks. In October 2024, the AJM published a Journalists' Safety Manual⁵⁷, in cooperation with the Public Prosecutor's Office and the Ministry of Interior. In addition, the Ministry of Interior appointed Muhamed Ismaili as a focal point, i.e. a person in charge of attacks on journalists and media workers.

In 2024, AJM registered four cases of attacks and threats against journalists and media workers, which is a decrease compared to previous years. Two incidents stand out in terms of seriousness: the first concerns the online harassment, threats and hate speech against TV24 journalist Lepa Dzundeva, due to her interview with Greek MP Angelos Syrigos, and the second is the case of unauthorized filming and surveillance of *Sloboden Pechat's* journalist Miroslava Simonovska. All cases were reported to the Ministry of Interior. For the attacks on Dzundeva, AJM filed an official request for criminal proceedings with the Cybercrime and Digital Forensics Department of the Ministry of Interior on behalf of the journalist. For the unauthorized filming, journalist Simonovska herself filed a criminal complaint with the Basic Public Prosecutor's Office in Skopje, and AJM and ITUJMW requested an urgent and thorough investigation into the case. The proceedings for these cases are still pending in the prosecutor's office.

— C.2 JOURNALISTS AND OTHER MEDIA ACTORS (WHOSE LIVES OR PHYSICAL INTEGRITY ARE AT REAL AND IMMEDIATE RISK) HAVE ACCESS TO SPECIAL PROTECTION/SAFETY MECHANISMS

The Law on Criminal Procedure provides for measures to protect victims of violence or threats to their lives, including journalists, when their safety is in question. Article 146, paragraph 1, item 6, provides for the possibility of prohibiting access to or contact with certain persons. However, this measure is applicable only if the person being threatened is known and the proceedings are already ongoing.

According to the intention of the law, the system is set up as a barrier against threats to safety and life, but

57 Association of Journalists of Macedonia, [Journalists' Safety Manual](#), Skopje, July 2024.

legal experts warn that this mechanism often proves insufficient in practice because it does not cover every possible risk, especially if the perpetrator is unknown. In 2024, there were no reported cases in which journalists requested physical protection from institutions.

There are organizations in the country that provide support to victims of various forms of violence – from shelters to legal and psychological counseling centers. Until now, journalists in cases of attacks or threats have turned to the AJM and ITUJMW, which then request that institutions take measures for the immediate protection of their attacked colleagues. The Journalists' Safety Manual published in 2024 also contains specific guidelines for journalists in cases of threats and violence in the performance of their professional duties.

— C.3 WOMEN JOURNALISTS HAVE ACCESS TO LEGAL MEASURES AND SUPPORT MECHANISMS WHEN FACED WITH GENDER-BASED THREATS, HARASSMENT AND VIOLENCE

The Istanbul Convention, ratified by North Macedonia in 2018, laid the foundations for a systemic approach to combating gender-based violence. Its principles are enshrined in the Law on Prevention and Protection from Violence against Women and Domestic Violence, which stipulates obligations for institutions regarding prevention, protection of victims and provision of free legal aid. The Ministry of Justice provides free legal aid through regional centers, but limited resources and insufficient implementation of these services leave room for legal uncertainty among victims. Although the legal framework offers support mechanisms, their implementation in practice is still not efficient, especially when it comes to women journalists' access to legal aid in cases of threats or gender-based violence.

Institutions responsible for reporting and acting on cases of gender-based violence are: the police, social work centers, the Ombudsman, the Commission for Protection from Discrimination, prosecutors' offices and courts. In order to better coordinate the actions of these institutions, it is planned to establish an integrated data collection system. However, although such a data collection system was established in 2024, this system does not categorize incidents according to the profession of the victim, so it is not possible to obtain information about whether there were women journalists among the victims.

According to the practice of the AJM, women journalists who face gender-based harassment, attacks or threats usually report these incidents to the Ministry of Interior or directly to the AJM. Therefore, the AJM continues to maintain its own register of attacks on journalists. In 2024, only a few cases of attacks on women journalists were recorded, but it is assumed that the real number is higher, since women journalists do not report all incidents. In addition, women journalists who face discrimination in the workplace can also contact the Commission for Prevention and Protection against Discrimination. However, in 2024 the Commission for Prevention and Protection

against Discrimination had not published information on cases of discrimination against women journalists.

— C.4 THE PRACTICE OF REGULAR PUBLIC CONDEMNATION OF THREATS AND ATTACKS AGAINST JOURNALISTS AND MEDIA HAS BEEN ESTABLISHED

Several cases of pressure, discrediting and obstruction of the work of journalists and media professionals were observed in 2024. Although reactions from government officials condemning threats or violence against journalists are common, there are also examples of negative rhetoric and pressure from politicians, public officials and institutions.

In March 2024, AJM filed an official complaint⁵⁸ with the State Election Commission (SEC) regarding the obstruction of journalists' work during the election process. Cases of hindering access to information for journalistic teams, as well as inappropriate treatment by certain institutions, were noted.

In April 2024, AJM reacted to the inappropriate behavior of certain politicians towards journalists. In one case, a high-ranking official made inappropriate comments towards a journalist during a press conference, thereby devaluing the media outlet for which the journalist was reporting⁵⁹. In addition, AJM publicly reacted to the request of a certain political party to remove journalists from reporting on certain political events, which constitutes a precedent and a violation of democratic principles⁶⁰.

These cases show that, despite regular public condemnation of attacks on journalists, challenges still exist regarding the behavior and communication of public officials with journalists and the media.

— C.5 POLICE AUTHORITIES ARE SENSITIVE TO THE JOURNALISTS' PROTECTION ISSUE

In 2024, the AJM and the Ministry of Interior continued their cooperation in the area of journalist protection and safety. One of the significant steps was the development of the Journalists' Safety Manual, which also contains recommendations for police officers on proper conduct in situations related to journalistic work, especially when reporting on protests, crisis events and election processes. This manual also offers practical steps for dealing with online threats, while requiring the Ministry of Interior to be proactively involved in the protection of media workers.

On November 2, 2024, on the occasion of the International Day to End Impunity for Crimes against Journalists, AJM demanded an immediate resolution of all open cases of violence against journalists, reforms in the regulation on

58 [AJM, Complaint to the SEC for obstructing the work of journalist Meri Jordanovska](#), April 24, 2024.

59 [AJM, Party tensions towards journalists are unnecessary and counterproductive – Kovachevski should not blame journalists](#), February 20, 2024.

60 [AJM, Condemnation of the attack on the TV24 journalist crew on the first day of the political campaign](#), April 5, 2024.

SLAPPs, and serious measures by the Ministry of Interior and the Public Prosecutor's Office to sanction verbal violence against journalists made via online platforms.

In 2024, the police showed increased sensitivity to issues of journalists' safety. According to the observations of AJM, in the past period there have been no cases of unfounded arrest or detention of journalists and media workers by the police, which indicates an improvement in relations between the institutions and the media community.

Despite the progress, there is still room for improvement in the attitude of law enforcement towards journalists, especially when reporting from the field where journalists and media workers are more exposed to risks. Continuous training of police officers on media freedom and the importance of journalists' safety is needed, as well as timely sanctioning of all cases of excessive use of force or impeding the work of journalists.

Additionally, during 2024, a system for regular communication between the AJM and the Ministry of Interior was established, which enabled timely action in cases of threats or attacks against journalists.

— C.6 SPECIALIZED INVESTIGATIVE UNITS AND/OR OFFICERS ARE EQUIPPED WITH EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

In February 2024, the Basic Public Prosecutor's Office in Skopje appointed⁶¹ Public Prosecutor Dejan Petreski as the contact person for cases related to the safety of journalists. In previous years, special public prosecutors were also appointed in the prosecutor's offices in Skopje, Bitola, Shtip and Tetovo.

In March 2024, the AJM, the Basic Public Prosecutor's Office Skopje and the Ministry of Interior held a joint debate⁶² dedicated to improving the protection and safety of journalists and media workers in the run-up to the parliamentary and presidential elections. The debate highlighted that law enforcement agencies still lack sufficient capacity to deal with cases of online attacks and threats, for which the AJM submitted complaints to the Cybercrime and Digital Forensics Sector of the Ministry of Interior during 2024. In addition, it was highlighted that more comprehensive systemic solutions are needed to improve the protection and safety of journalists.

There is cooperation between the competent institutions, but it does not result in sufficient efficiency in discovering the perpetrators of the attacks over the past 10 years. Investigations are mostly slow and ineffective, and for some attacks on journalists, no charges have been filed at all. More specifically, we are talking about more than 80

61 Press release, [The newly appointed prosecutor to monitor cases in the Public Prosecutor's Office Skopje related to the safety of journalists at a regional conference in Belgrade](#), Public Prosecutor's Office, 28.02.2024.

62 Press release, [AJM, Public Prosecutor's Office and Ministry of Interior – Strengthening joint efforts towards achieving greater safety of journalists and media workers – Association of Journalists of Macedonia](#), AJM, 26.03.2024.

cases that AJM has registered from 2014 to 2024, of which only a dozen have been finalized with a court verdict.

— **C.7 INVESTIGATIONS OF SERIOUS PHYSICAL ATTACKS ON JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT EFFICIENTLY (INDEPENDENTLY, THOROUGHLY AND PROMPTLY)**

During 2024, AJM recorded a total of four attacks and serious threats directed at journalists and media workers. All four incidents were reported to the Ministry of Interior (Mol), and one was directly reported to the Basic Public Prosecutor's Office (BPPPO). Despite the decrease in the number of attacks compared to the previous year, 2023, it is concerning that these cases were not resolved quickly, and information from the BPPPO on the progress of the proceedings is also lacking. Investigations, similar to cases from previous years, are proceeding slowly, and charges have not been filed for some attacks.

According to data from the AJM Register, the number of attacks on journalists has been declining in the last three years. In 2022, 7 attacks were registered, of which 2 cases were resolved by court decision; in 2023, the number of attacks was 5, of which 2 cases were resolved in court; in 2024, 4 attacks were registered, of which 3 cases were initiated. This shows that the problem of impunity for incidents from previous years is still present, and the slow processing of new cases further worsens the situation and reduces trust in institutions.

— **C.8 JOURNALISTS AND OTHER MEDIA ACTORS ARE EFFICIENTLY PROTECTED FROM VARIOUS FORMS OF ONLINE HARASSMENT**

The amendments to the Criminal Code, adopted in 2023, brought significant improvements in the protection of journalists and media workers, especially with regard to the crimes of murder, Article 123 of the Criminal Code, coercion, Article 139 of the Criminal Code, endangering of safety, Article 144 of the Criminal Code, as well as preventing an official from performing an official act, Article 382 of the Criminal Code. These crimes were qualified in cases where the victims are journalists, which resulted in higher penalties for these crimes and an obligation for the Prosecutor's Office to act ex officio in such cases. In addition, the legal amendments introduced a new criminal offense of "stalking" (Article 144-a of the Criminal Code), which is defined as continuous and unwanted surveillance or harassment that causes a feeling of fear or insecurity for the victim. This provision is particularly important for journalists who are also exposed to this form of pressure and threats.

In 2024, a serious case was the threats and incitement of hate speech on social media against journalist Lepa Dzundeva from TV 24, due to her interview with Greek MP Syrgos. A segment of this interview, taken out of context, was published by evening TV show host Bogdan Ilievski on his Facebook profile, which prompted many comments with hate speech and

threats against the journalist. Some online media, especially Off.net.mk, followed up by defaming Dzundeva, using her photo on social media, which provoked comments with personal insults, calls for belittling and explicit threats to the journalist's life. Neither this nor the other three cases registered in 2024, despite promises from the competent institutions, were followed-up by a quick and efficient procedure, i.e. by the time this report was prepared, there was no information about specific court proceedings or decisions made.

— C.9 INVESTIGATIONS OF ALL TYPES OF ATTACKS AND VIOLENCE AGAINST JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT TRANSPARENTLY

During 2024, the transparency of court proceedings involving journalists remained at the same level as in previous years. The basic civil and criminal courts in Skopje do not provide detailed information on the progress of proceedings related to attacks on journalists, except in cases where a specific request has been submitted. The courts do not regularly inform the public or journalist associations, such as AJM and ITUJMW, about the progress of these proceedings.

AJM continues to collect information on cases of threats and attacks on journalists through direct communication with judicial and prosecutorial authorities. It is worrying that by the end of 2024, the competent institutions had not completed the procedure for the four registered violations of journalists' rights. AJM received information that the case of Furkan Saliu is processed by the prosecutor's office and the case of the burned vehicle of journalist Blagoj Sersemov is being investigated by the Ministry of Interior. For the other two registered attacks, according to information received from the Public Prosecutor's Office in Skopje, the cases are processed by the prosecutor's office.

Although the cooperation of AJM with the competent institutions is good, this situation indicates the need for greater transparency and efficiency in the actions of the competent institutions, in order to ensure adequate protection of journalists and reduce impunity for attacks on them.

— C.10 QUALITY STATISTICS COLLECTION SYSTEMS ESTABLISHED BY STATE AUTHORITIES TO STEM IMPUNITY

During 2024, the situation regarding the establishment of quality statistical systems for monitoring court proceedings related to journalists and media workers remained unchanged.

The Ministry of Interior has established an internal register of statistical data on attacks and threats against journalists. The internal register of the Ministry of Interior is considered a relatively reliable tool, and in most cases the data coincides with the records of the AJM. However, there are certain differences in the way of categorization, as the Ministry of Interior registers incidents according to its own methodology, which does not

always coincide with that of the AJM. When detailed data is requested, in most cases the Ministry of Interior provides quick and specific information, which is of great benefit for monitoring cases and for effective protection of journalists.

The courts have not yet established systems that allow for accurate monitoring and reporting of these cases. The existing databases in the courts do not allow for searching cases according to the criterion of the profession of the parties, which makes it difficult to monitor proceedings involving journalists or media. This is often used as an excuse for the absence of a separate register in the judicial authorities for violations of the rights of media workers. Therefore, the AJM obtains the necessary data from the judicial institutions most often through direct communication with representatives of the judicial authorities.

This situation imposes the need to improve statistical systems in both the Ministry of Interior and judicial institutions, in order to ensure effective protection of journalists and media workers and to stem impunity for attacks on them.

— C.11 NON-PHYSICAL THREATS AND HARRASSMENT

Over the past year, according to the official register of attacks and threats of the Journalist Association of Macedonia, a gross violation of the rights of journalist Miroslava Simonovska has been recorded. The video of her allegedly receiving documents, which was shared on national television by the head of the High Public Prosecutor's Office, Muhamed Hajrullahi, raises serious questions about privacy, illegal surveillance and the rights of journalists in Macedonia. The publication of the illegally recorded video of journalist Miroslava Simonovska violates her privacy and her fundamental rights, regardless of the fact that the published video material blurs the faces in the video. This action was taken in order to intimidate and discredit journalist Miroslava Simonovska due to her critical work, related to the journalistic investigation of the work of a high-ranking public prosecutor. It represents a direct attack on journalistic independence and a threat to the investigative work of all professional journalists.

Category	Number	Brief description of the cases
<p>Threats and harassment that do not concern the physical safety of journalists.</p> <p>This category of threats and harassment includes:</p> <ul style="list-style-type: none"> – surveillance or monitoring; – harassing phone calls; – arbitrary judicial or administrative harassment; – aggressive statements by public officials; – other forms of pressure that may endanger the safety of journalists in the performance of their work. <p>These types of threats do not include mobbing and violence in the workplace</p>	1	<ul style="list-style-type: none"> – Journalist Miroslava Simonovska was unauthorizedly monitored and filmed, and a video of her allegedly receiving a document was distributed to the media.

— C.12 THREATS AGAINST THE LIVES AND PHYSICAL SAFETY OF JOURNALISTS

The serious case of threats and incitement of hate speech against journalist Lepa Dzundeva from TV 24 took a dramatic turn when, after the publication of part of her interview with Greek MP Syrigos, a massive campaign against her began on social media. The post by TV host Bogdan Ilievski, who shared the segment from the interview, openly incited hate speech and threats against the journalist's life, and that was just the beginning of a series of incidents.

An avalanche of comments were shared on social media in which the journalist was vilified, insulted, attacked, and some of the comments even contained threats that directly targeted her life. The campaign continued to spread through various online media outlets, which republished the segment from the interview, inflaming the campaign and inciting new attacks against the journalist.

Regarding this case, AJM submitted a request to the Cybercrime and Digital Forensics Department at the Ministry of Interior, in order to shed light on the case and protect the journalist's safety.

Category	Number	Brief description of the cases
Threats to the life and physical safety of journalists This type of threats include: <ul style="list-style-type: none"> – death threats against journalists, friends of journalists, members of their families or information sources; – threats of physical harm to journalists, friends of journalists, members of their family or sources of information. These threats can be: <ul style="list-style-type: none"> – made directly or through third parties; – sent electronically or directly face to face; – implicit, but also explicit. 	1	– Threatening comments regarding the physical safety of journalist Lepa Dzundeva posted on social media by third parties

— C.13 ACTUAL ATTACKS

During 2024, according to the AJM register⁶³, two direct attacks on journalists or their equipment and property were recorded.

This event follows a series of investigative stories related to the work of court enforcement agent Vesna Jakimovska from Kicevo, published by journalist Furkan Saliu from PortalX. While taking a statement from the enforcement agent, he was physically attacked by her and, in the process, suffered an injury to his hand, and part of his professional recording equipment was broken. The journalist called the police at

63 Association of Journalists of Macedonia, [Register of threats and attacks against journalists and media workers](#).

the scene and gave a statement at the police station. The prosecutor from Kicevo was also notified of this event.

This incident occurred after a series of investigative stories was published, related to the enforcement agent by PortalX and Saliu, who was physically attacked by the perpetrator while taking a statement. In the process, he sustained an injury to his hand and his microphone was broken. Journalist Saliu immediately called the police after the incident and gave a statement at the police station. The prosecutor from Kicevo was also notified of this event. AJM informed the competent authorities in the Ministry of Interior and the Public Prosecutor's Office about the case on the same day.

Category	Number	Brief description of the cases
Real attacks on journalists Types of real attacks on journalists may include physical or mental harm inflicted, kidnapping, entry into a home or office, seizure of equipment, arbitrary detention, failed assassination attempt, etc..	2	<ul style="list-style-type: none"> While taking a statement from the enforcement agent, journalist Saliu was physically attacked by her, sustaining an injury to his hand and breaking his microphone. The passenger vehicle of the journalist and editor of the Shtip-based M-net television station was set on fire by unknown perpetrators in the yard of his family home.

— C.14 THREATS AND ATTACKS ON MEDIA OUTLETS AND JOURNALISTS' ASSOCIATIONS

AJM did not register any attacks of this type in 2024. Compared to previous years, the situation remains unchanged for this indicator.

Category	Number	Brief description of the cases
Threats and attacks on media and journalist organizations Actual attacks on media and organization property, their personnel, confiscated equipment, aggressive statements by public officials, etc. Also, threats and attacks may include some of the above categories.	0	<ul style="list-style-type: none"> In 2024, not a single case falling into this category was recorded.



Conclusions and recommendations

CONCLUSIONS

LEGAL SAFEGUARDS AND THEIR IMPLEMENTATION

In 2024, several significant amendments were made to the media legislation in the Republic of Macedonia, which attempted to improve the regulation and further align it to European standards. The most striking was the amendment to the Law on Media, which for the first time introduced precise rules for granting public financial support to print media. Through the new Articles 28-a, 28-b and 28-c, criteria for the distribution of funds, a procedure through a public call and a mandatory agreement between the state and the media were established, which is a step towards greater transparency and accountability.

Additionally, the same legal framework was expanded by defining online media as a separate category, as well as by the obligation to establish a register of internet portals under the jurisdiction of the Agency for Audio and Audiovisual Media Services (AAAVMS). These amendments aim to introduce greater editorial clarity, but at the same time provoked reactions from part of the media community due to the strict criteria that may limit the access of smaller and local media to financial support or public credentials. Although some of the amendments are aimed at fulfilling European recommendations and obligations from the Rule of Law Roadmap, a comprehensive and substantive media reform is still lacking. The return of state advertising and the lack of a clear strategy for media pluralism increase the risks of political influence and economic dependence. Further improvement of media regulation through inclusive consultations remains necessary, in order to strengthen the independence of the media and ensure fair and equal access to public resources for all media actors.

Despite the adopted pieces of legislation that should guarantee media freedom, their application is often selective and ineffective. Cases of

threats and attacks on journalists rarely resulted in a legal resolution. During the year, the AJM repeatedly reacted to cases of pressure and threats against journalists, insisting on a prompt and transparent investigation. Although there were certain improvements in communication with the competent authorities, there remains a need for a more systematic application of legal mechanisms that would guarantee the safety of media workers and prevent their intimidation.

POSITION OF JOURNALISTS IN NEWSROOMS

In 2024, the position of journalists in newsrooms remained vulnerable, facing structural problems such as low salaries, inadequate working conditions and limited opportunities for professional development. AJM continuously emphasized that without financial stability and adequate working conditions, the independence of journalism is seriously threatened.

Newsrooms and media outlets still operate in an environment where commercial and political pressures have a significant impact on editorial policy. While there are examples of independent media outlets that manage to maintain professional standards, much of the sector is experiencing self-censorship as a result of fear of pressure or economic uncertainty. This trend is affecting the quality of reporting and reducing the scope for investigative journalism.

JOURNALISTS' SAFETY IN THE REPUBLIC OF MACEDONIA

The safety of journalists in the country remains a pressing issue, despite public commitments by institutions to improve it. During 2024, AJM recorded an increased number of threats, insults and attempts to discredit journalists, especially through social media. While physical attacks were less common than in previous years, hate speech and intimidation increased, especially against journalists reporting on corruption, organized crime and political abuse.

The reactions of the competent institutions remained slow and ineffective, which further entrenched the culture of impunity for attacks on journalists. Improved cooperation with the Ministry of Interior and the Public Prosecutor's Office was a positive step, but more systematic and energetic institutional action is still needed to prevent threats and violence against media workers.

GENERAL CONCLUSION

In 2024, the Republic of North Macedonia made moderate progress in the areas of media freedom and the safety of journalists, but significant challenges remain and they undermine the independence of the media and the legal protection of the journalistic profession. The implementation of existing legal guarantees for the protection of journalists remains inconsistent, and the slowness of judicial processes in cases of attacks on journalists reduces the effectiveness of legal mechanisms.

The media reform process, which was supported by the European Union, did not result in the adoption of key proposals to strengthen media pluralism. Instead, amendments to the Law on Audio and Audiovisual Media Services revived the issue of state advertising in private media, which creates a risk of political influence on the media sphere. At the same time, the deadlock in the election of new members of the AAVMS Council and the MRT Program Council continues, which negatively affects the work and independence of key media institutions.

Regarding the position of journalists in newsrooms, economic insecurity, low salaries and lack of respect for workers' rights remain the biggest problems. These factors directly affect the quality and independence of journalistic work, as evidenced by the increasing cases of self-censorship. In addition, although the number of direct physical attacks on journalists has decreased, pressures on critical media outlets have increased through strategic lawsuits against public participation, commonly known as SLAPPs, which pose a serious threat to freedom of expression.

In conclusion, although 2024 brought some positive changes in the legal framework for the media, consistent implementation remains a challenge. Strengthening media institutions, the economic stability of journalists, and protection from pressures and threats are essential conditions for the development of free and independent media. AJM remains committed to promoting journalistic rights and media freedom, in order to build a better and safer environment for professional and responsible journalism in North Macedonia.

RECOMMENDATIONS

A: LEGAL SAFEGUARDS AND THEIR IMPLEMENTATION

- Implement the procedure for the election of members of the AAVMS Council and the MRT Program Council by the Assembly of the RNM.
- The procedure should be conducted in a transparent manner, with a public hearing of all candidates and the opportunity for questions from stakeholders, which would strengthen the merit principle, while maintaining a two-thirds majority in the decision-making of the Assembly.
- An analysis of the provisions of the Law on Audio and Audiovisual Media Services and other relevant laws is needed from the perspective of improving the financial situation of private media and introducing mechanisms for tax relief and similar benefits for the media.
- It is necessary to adopt a new Media Law that will place the main focus on protecting journalists and media workers inside newsrooms.
- There is a need to create Anti-SLAPP mechanisms in cooperation with the Ministry of Justice in accordance with the 2024 Council of Europe Recommendation and the 2023 European Parliament Directive
- It is urgently necessary to open a debate on the possible establishment of a media pluralism fund, especially on the goals and criteria of financial support (encouraging program diversity, improving the status of journalists, etc.), the method of distributing funds, and the independence and objectivity in the implementation of the procedure.
- Amendments to the Electoral Code are needed, simplifying the rules for the media campaign and reducing the possibility of abuse of paid political advertising in private media. This recommendation is made in conditions where there is no political will to abolish paid political advertising.
- Initiate amendments to the Code of Ethics for Journalists in the public service MRT to strengthen internal self-regulation in this media service.
- Enact a new law on Free Access to Public Information that will benefit information seekers in terms of quickly and efficiently receiving feedback and responses from information holders.

B: POSITION OF JOURNALISTS IN NEWSROOMS

- Continue the efforts of ITUJMW, with the support of AJM, in signing new collective agreements with private media.

- Conduct campaigns and trainings, through which journalists and media workers would become more familiar with their basic labor rights.
- Journalist guild associations should continue providing legal assistance and consultancy to journalists and media workers.
- Cooperation and dialogue with institutions should be intensified in the interest of protecting workers' rights.
- A quality program for retraining and further training of journalists and media workers should be provided, to make them more competitive in the labor market.

C: STRENGTHENING JOURNALISTS' SAFETY:

- Establish special registers for cases of lawsuits against journalists, within the basic civil and criminal courts, including the Public Prosecutor's Office.
- Effective implementation of laws for better safety of journalists and media workers.
- Continuous process of building the capacities of journalists, lawyers, judges and prosecutors on topics related to sanctioning attacks against journalists and the general interpretation of Article 10 of the ECHR.
- Improve cooperation with the newly elected representatives of the RNM Assembly on topics related to freedom of expression and media policies.
- Introduce protocols and improve internal procedures in institutions, with the aim of preventing violence against journalists and effectively sanctioning it.
- Improve the cooperation of AJM with the Ombudsman.

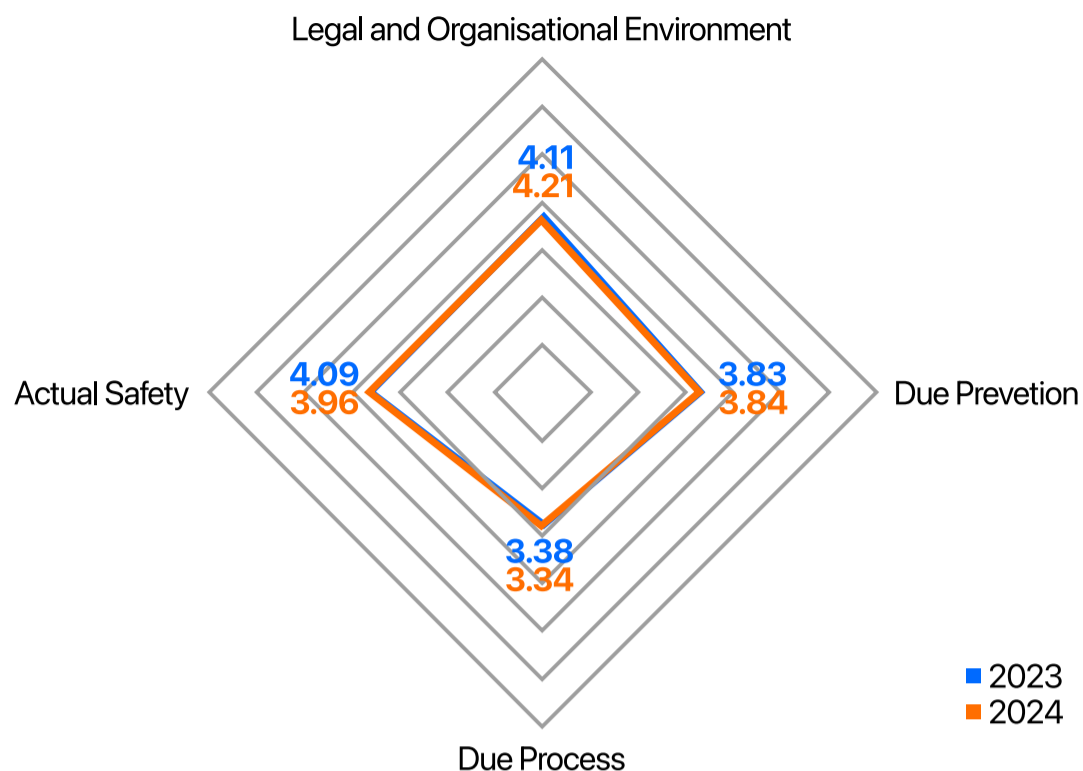
IV

Journalists' Safety Index in North Macedonia – 2024

This section of the report graphically presents the Journalists' Safety Index in 2024, compared to the previous year 2023. For each of the four dimensions and for all 19 indicators, a brief explanation of the key changes that occurred in 2024 is provided.

A more extensive explanation of the data and the changes that have occurred for each individual indicator of the Index can be read in the narrative part of the report:

Indicator in the Journalists' Safety Index	Narrative report
I. Legal and organizational environment	
Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	A.6
The confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities	A.8
Other laws are enforced objectively and allow journalists and other media actors to work freely and safely	A.7
Journalists are free to pursue their profession and to establish, join and participate in their associations	A.9
The job positions of journalists are stable and protected at the workplace	B.1
II. Due Prevention	
Journalists and media actors have access to immediate and effective protective measures	C.1
Journalists and other media actors (whose lives or physical integrity are at real and immediate risk) have access to special protection or safety mechanisms	C.2
Women journalists have access to legal measures and support mechanisms when faced with gender-based threats, harassment and violence	C.3
The practice of regular public condemnation of threats and attacks on journalists and media has been established	C.4
Police authorities are sensitive to the journalist protection issue	C.5
III. Due Process	
Specialized units/officers are equipped with expertise for investigating attacks and violence against journalists	C.6
Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)	C.7
Journalists and other media actors are efficiently protected from various forms of online harassment	C.8
Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently	C.9
Quality statistics collection systems established by state authorities to stem impunity	C.10
IV. Actual Safety	
Non-physical threats and harassments	C.11
Threats against the lives and physical safety of journalists	C.12
Actual attacks	C.13
Threats and attacks on media outlets and journalists' associations	C.14



	2023	2024		Main developments in each dimension
Legal and organizational environment	4.11	4.21	↑	In 2024, a decrease in the number of attacks and pressures on journalists was observed, but impunity for previous cases remains a serious problem in the country. Media reforms have a slow pace, and state advertising and SLAPPs remain worrying trends. Although no new members of the governing bodies of the AAVMS and the MRTV Program Council were elected, initiatives for their change were launched towards the end of the year, which are expected to be voted on in the RNM Assembly in 2025.
Due Prevention	3.83	3.84	↑	Moderate progress was maintained in ensuring a faster and more efficient institutional response to threats and attacks against journalists in 2024. The appointment of public prosecutors in three appellate jurisdictions with jurisdiction to follow up on such cases, as well as the establishment of a special contact line for journalists and media workers, contributed to improving access to protection mechanisms.
Due Process	3.38	3.34	↓	In 2024, the improved coordination between the competent institutions, which began in 2023, was maintained, but unfortunately did not result in increased efficiency in detecting and processing attacks on journalists. Of the four registered cases of threats and attacks, all cases are still under investigation by the prosecutor's office. This indicates a moderate regression in the institutional response, but further work is needed to ensure a full legal resolution and strengthen trust among the media community.
Actual Safety	4.09	3.96	↓	The number of physical attacks and threats against journalists has decreased compared to last year. However, the level of impunity for this type of attacks is still high, as a significant number of cases from previous years have not yet been investigated and concluded. The trend of increasing online threats against women journalists in the country is worrying.
Journalists' Safety Index	3.91	3.85	↓	

Legal and organizational environment

Legal provisions related to defamation and their implementation do not produce chilling effects on journalists and media

4.40

Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities

4.89

Other laws are implemented objectively and allow the journalists and other media actors to work freely and safely

4.08

Journalists are free to pursue their profession and to establish, join and participate in their associations

4.38

Journalists' job position is stable and protected at the workplace

3.29

1.00 By law, but also in practice, there is absolutely no protection of journalists' job positions, their sources and their organizations, which creates an extremely chilling effect.

2.00

3.00

4.00

5.00

6.00

7.00



By law, but also in practice, there is the highest degree of protection of journalists' job positions, their sources and their organizations.

INDICATOR 1.1

— LEGAL PROVISIONS RELATED TO DEFAMATION AND THEIR APPLICATION DO NOT CREATE A CHILLING EFFECT ON JOURNALISTS AND THE MEDIA

Score for 2023: 4.22 / Score for 2024: 4.40

The overall score for this indicator in 2024 is slightly better than the previous one, primarily due to the trend of decreasing the number of defamation or insult lawsuits against journalists and media outlets. However, journalists this year still do not assess the Law on Civil Liability for Defamation and Insult as restrictive for their work.

INDICATOR 1.2

— THE CONFIDENTIALITY OF JOURNALISTS' SOURCES IS GUARANTEED IN THE LEGISLATION AND RESPECTED BY THE AUTHORITIES

Score for 2023: 4.83 / Score for 2024: 4.89

Compared to the previous year, there is a slight improvement in this indicator in 2024 due to strengthened mechanisms for the protection of journalist sources – legal guarantees regarding protected reporting, whistleblower rights, as well as more efficient actions of institutions regarding protected reporting and ensuring protection of whistleblowers. Journalists working on investigative topics related to corruption or crime generally feel free to contact information sources. However, although whistleblowers (as an important group of journalist sources) are legally and institutionally better protected, only a small number of them report cases to the competent institutions or to journalists on their own initiative.

INDICATOR 1.3

— OTHER LAWS ARE ENFORCED OBJECTIVELY AND ENABLE JOURNALISTS AND OTHER MEDIA ACTORS TO WORK FREELY AND SAFELY

Score for 2023: 4.02 / Score for 2024: 4.08

The situation regarding this indicator is almost unchanged compared to 2023 because the state has not yet taken any action to introduce legal protection from so-called unfounded lawsuits against journalists and media outlets that aim to financially drain them (SLAPPs). Such a practice has been registered in the country with several cases, which clearly indicate that it is an attempt by powerful figures to exert pressure on journalists. Compared to 2023, the number of such SLAPPs against journalists and media workers increased in 2024. On the other hand, the minimal improvement relates to the proactivity of the AJM, where it initiates constructive proposals to the Ministry of Justice and the Government of the Republic of North Macedonia on the need to create Anti-SLAPP mechanisms in the country, which was met with positive political will and assurance that the initiatives will be translated into legal reforms in accordance with European standards.

INDICATOR 1.4

— JOURNALISTS ARE FREE TO PRACTICE THEIR PROFESSION AND TO ESTABLISH, JOIN AND PARTICIPATE IN THEIR ASSOCIATIONS

Score for 2023: 4.19 / Score for 2024: 4.38

In 2024, the situation regarding the free exercise of the journalistic profession has improved slightly compared to the previous year, primarily due to the fact that awareness among the journalistic profession and solidarity have increased, and the number of members in the associations and the union has also increased. Two professional associations are active, but it is still important to work on their sustainability. In 2024, there were no serious pressures on the associations, but there is resistance among owners or managers of private media outlets in regards to journalists joining the journalistic union and establishing union organizations.

INDICATOR 1.5

— THE JOB POSITIONS OF JOURNALISTS ARE STABLE AND PROTECTED IN THE WORKPLACE

Score for 2023: 3.29 / Score for 2024: 3.29

The situation with labor rights and the working status of journalists has not improved in 2024. There are cases of journalists in private media who have signed short-term employment contracts, i.e. fixed-term contracts, work overtime or their income is low and irregular. Journalists in private media are afraid to initiate legal proceedings for mobbing or violations of labor rights and to organize themselves in unions. In the public broadcasting service, the situation is somewhat better, journalists have a collective agreement that improves working conditions and there is also a union organization with a representative number of members.



Due prevention



INDICATOR 2.1

— JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES WHEN EXPOSED TO THREATS

Score for 2023: 3.83 / Score for 2024: 3.81

During 2024, the situation remained unchanged, i.e. there was a slight decrease in journalists' access to quick and effective protection measures in cases of threats and attacks. In addition to the appointed special prosecutor at the Basic Public Prosecutor's Office, responsible for monitoring the proceedings in cases in which journalists are attacked, the jurisdiction of three more prosecutors in three more appellate areas has been increased, and a special line has been opened for journalists to contact. Of the four registered attacks on journalists, only one is in court proceedings, the remaining three are still in prosecution proceedings.

INDICATOR 2.2

— JOURNALISTS AND OTHER MEDIA ACTORS (WHOSE LIVES OR PHYSICAL INTEGRITY ARE AT REAL AND IMMEDIATE RISK) HAVE ACCESS TO SPECIAL PROTECTION/SAFETY MECHANISMS

Score for 2023: 3.45 / Score for 2024: 3.75

There were no major changes in terms of journalists' access to physical protection measures in cases of serious threats to their safety during 2024. There are provisions in the Law on Criminal Procedure that guarantee special protection measures for journalists, but the risk assessment procedure is not clearly defined enough, and therefore it is not known how practically applicable it is. Precautionary measures are proposed by a public prosecutor, and are determined by a judge in a preliminary procedure, based on an assessment of the seriousness of the situation, the type of crime, the danger to the victim, etc.

INDICATOR 2.3

— WOMEN JOURNALISTS HAVE ACCESS TO LEGAL MEASURES AND SUPPORT MECHANISMS WHEN FACING GENDER-BASED THREATS, HARASSMENT AND VIOLENCE

Score for 2023: 3.60 / Score for 2024: 3.58

In 2024, the situation regarding this indicator did not improve compared to previous years. Despite the measures incorporated in the Law on Prevention and Protection from Violence against Women and Domestic Violence, the established mechanism for free legal aid at the Ministry of Justice is almost never used to support victims of gender-based attacks and violence, including women journalists. According to the practice of the AJM, women journalists who face harassment, attacks or threats on a gender basis usually report these incidents to the Ministry of Interior or directly to the AJM. Therefore, the AJM continues to maintain its own register of attacks on journalists.

In 2024, only a few cases of attacks on women journalists were recorded, but it is assumed that the real number is higher, since women journalists do not report all incidents. In addition, women journalists who face discrimination in the workplace can also contact the Commission for Prevention and Protection from Discrimination. However, according to the AJM, in 2024 there were no reports from women journalists.

INDICATOR 2.4

— THE PRACTICE OF REGULAR PUBLIC CONDEMNATION OF THREATS AND ATTACKS AGAINST JOURNALISTS AND MEDIA HAS BEEN ESTABLISHED.

Score for 2023: 3.46 / Score for 2024: 3.33

There is a slight deterioration in the situation regarding this indicator, compared to last year, as very few examples of verbal attacks on journalists by public office holders were registered. Otherwise, the general assessment is that in recent years a practice of public condemnation of attacks on journalists has been established. These cases show that challenges still exist regarding the behavior and communication of public officials with journalists and the media.

INDICATOR 2.5

— POLICE AUTHORITIES ARE SENSITIVE TO THE JOURNALISTS' PROTECTIONS ISSUE

Score for 2023: 4.79 / Score for 2024: 4.75

There were no major changes in the behavior of the police towards journalists. During 2024, the police demonstrated correct behavior towards journalists and the media in various situations. This is the result of a series of joint activities of the AJM and the police authorities over the past years: AJM, in cooperation with the Ministry of Interior, developed a Protocol for Safety in the Online Space for Women journalists. In the context of this cooperation, several manuals were also published, intended for both journalists and police officers. Despite the progress, there is still room for improvement in the attitude of the police towards journalists, especially when reporting from the field where journalists and media workers are more exposed to risks. Continuous training of police officers on media freedom and the importance of Journalists' Safety is needed, as well as timely sanctioning of all cases of excessive use of force or impeding the work of journalists. Additionally, during 2024, a system for regular communication between the AJM and the Ministry of Interior was established, which enabled timely action in cases of threats or attacks against journalists.



Due process

Specialised investigation units and/or officers are equipped with relevant expertise for investigating attacks and violence against journalists

3.42

Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)

3.48

Journalists and other media actors are efficiently protected from various forms of online harassment

3.37

Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently

3.10

Quality statistics collection systems established by state authorities to stem impunity

3.33

1.00 Institutions do not investigate and do not sanction attacks on journalists, including online harassment, threats against the lives and physical safety of journalists, and physical attacks on journalists and media.

2.00

3.00

4.00

5.00

6.00

7.00



Institutions are fully effective and transparent in investigating and sanctioning attacks on journalists, including online harassment, threats against journalists' lives and physical safety, and physical attacks on journalists and the media.

INDICATOR 3.1

— SPECIALIZED INVESTIGATIVE UNITS AND/OR OFFICERS ARE EQUIPPED WITH EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

Score for 2023: 3.43 / Score for 2024: 3.42

In 2024, the situation regarding this indicator has hardly changed. Specific guidelines that could help conduct investigations more efficiently have not yet been adopted. A positive change is the appointment of three new prosecutors, in the other three appellate areas except for Skopje, who will monitor the proceedings in cases in which journalists are attacked. However, public prosecutors are still very inert in terms of initiating proceedings.

INDICATOR 3.2

— INVESTIGATIONS INTO SERIOUS PHYSICAL ATTACKS ON JOURNALISTS AND OTHER MEDIA ACTORS ARE CONDUCTED EFFICIENTLY (INDEPENDENTLY, THOROUGHLY AND PROMPTLY)

Score for 2023: 3.48 / Score for 2024: 3.48

Although impunity is still a major problem, the perception is that there is a slight setback in 2024, compared to previous years, primarily due to the problem of slow and ineffective investigations, and for certain attacks on journalists in the past ten years, no charges have been filed at all.

INDICATOR 3.3

— JOURNALISTS AND OTHER MEDIA ACTORS ARE EFFICIENTLY PROTECTED FROM VARIOUS FORMS OF ONLINE HARASSMENT

Score for 2023: 3.51 / Score for 2024: 3.37

During 2024, a slight improvement was noted in the protection of journalists from online threats, due to the fact that the competent institutions (specifically the Ministry of Interior) reacted in a timely manner to find the persons who made serious threats to the lives of journalists via Facebook. In 2024, three cases were being conducted at the Basic Public Prosecutor's Office for three cases of attacks and threats made online, which are still in prosecution proceedings, while one case is in court proceedings.

INDICATOR 3.4

— INVESTIGATIONS INTO ALL TYPES OF ATTACKS AND VIOLENCE AGAINST JOURNALISTS AND OTHER MEDIA ACTORS ARE CONDUCTED TRANSPARENTLY

Score for 2023: 3.10 / Score for 2024: 3.10

In terms of transparency of court proceedings in which journalists are parties, the situation is almost the same as in the previous year. The Basic Civil and Criminal Courts in Skopje do

not provide detailed information on court proceedings regarding attacks on journalists. The courts do not have a practice of informing the public about proceedings related to attacks on journalists and the media. The existing information system does not provide an opportunity for precise searching of past and current proceedings in which journalists are parties. Although the cooperation of AJM with the competent institutions is good, this situation nevertheless indicates the need for greater transparency and efficiency in the actions of the competent institutions, in order to ensure adequate protection of journalists and to reduce impunity for attacks on them.

INDICATOR 3.5

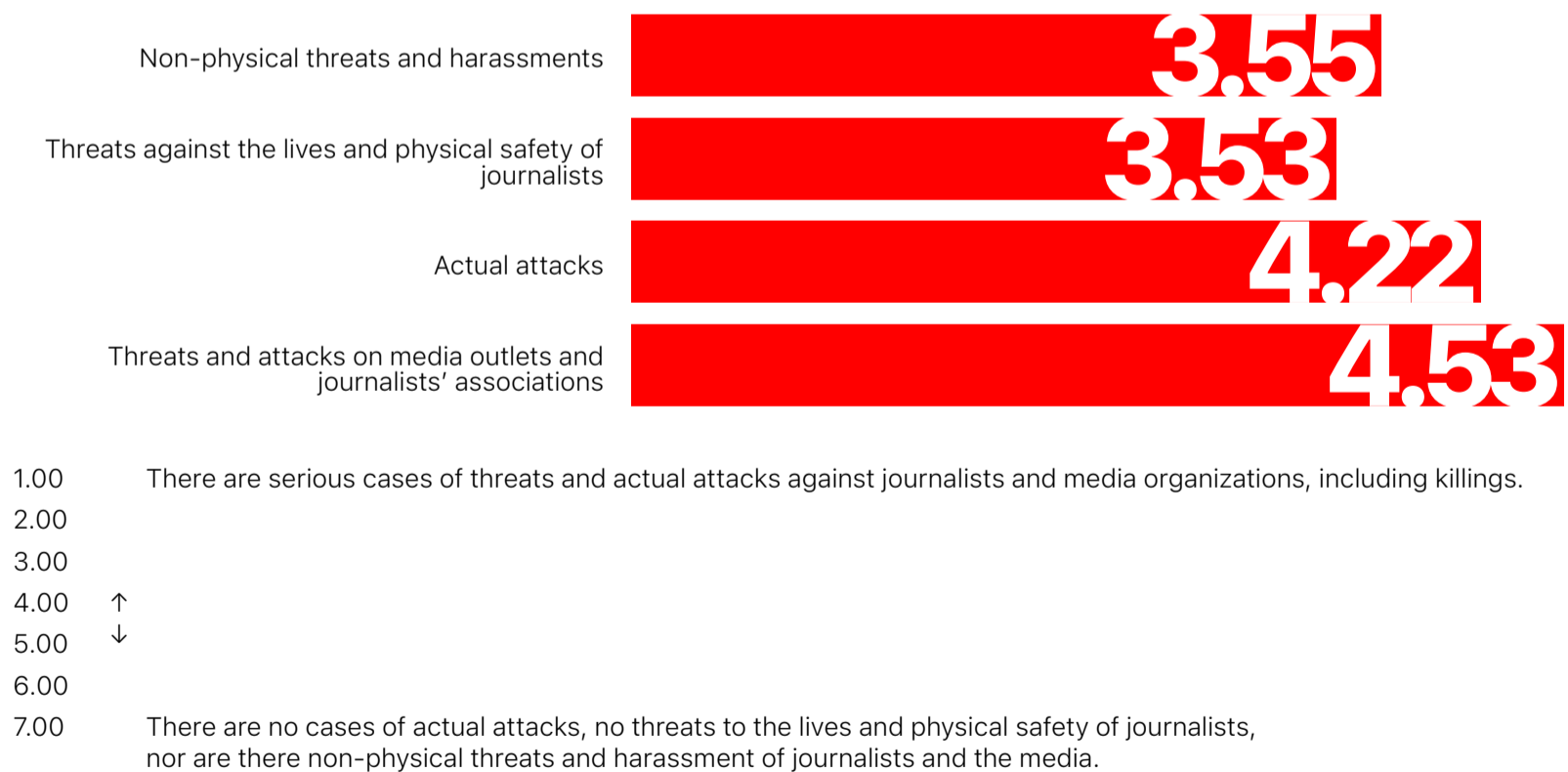
— **QUALITY STATISTICS COLLECTION SYSTEMS
ESTABLISHED BY STATE AUTHORITIES TO STEM
IMPUNITY**

Score for 2023: 3.40 / Score for 2024: 3.33

In terms of this indicator, the situation is almost identical with a slight decrease compared to 2023. The courts and competent institutions, despite the initiatives of the AJM, have not yet established quality statistical systems, on the basis of which they can provide precise data on all court proceedings in which journalists or media are parties. Neither the civil nor the criminal court in Skopje are able to provide detailed information regarding the cases in which journalists appear as parties to the proceedings. This situation imposes the need to improve the statistical systems in both the Ministry of Interior and judicial institutions, in order to ensure efficient protection of journalists and media workers and to stem impunity for attacks on them.

IV

Actual Safety



INDICATOR 4.1

— NON-PHYSICAL THREATS AND HARRASSMENT

Score for 2023: 3.80 / Score for 2024: 3.55

Although there was a slight improvement in 2023, in terms of the number of attacks in this category, the level of impunity for this type of attack is still high in the country and therefore there is a slight setback in 2024. Unlike 2020 and 2021, when AJM registered seven and three attacks of this type, respectively, in 2022 and 2023 two attacks on journalists were registered, respectively, and one such attack was registered in 2024. However, of the thirteen attacks that occurred in the past four years, including 2020, unfortunately only two cases have had a court resolution.

INDICATOR 4.2

— THREATS AGAINST THE LIVES AND PHYSICAL SAFETY OF JOURNALISTS

Score for 2023: 3.67 / Score for 2024: 3.53

There is a slight deterioration in the situation with this indicator, primarily due to the ineffective sanctioning of threats that occurred in previous years. Compared to 2022, when AJM had recorded only two threats, in 2023 only one threat to the life and safety of journalist Ognen Janeski was recorded, and this case is still processed by the public prosecution. In 2024, the serious case of threats and incitement of hate speech against journalist Lepa Dzundeva from TV 24 took a dramatic turn when, after the publication of part of her interview with Greek MP Syrigos, a massive campaign against her began on social media. The publication of TV presenter Bogdan Ilievski, who shared the segment from the interview, openly incited hate speech and threats to the journalist's life, and this was just the beginning of a series of incidents. An avalanche of comments were shared on social media in which the journalist was vilified, insulted, attacked, and some of the comments even contained threats that directly referred to her life. The campaign continued to spread through various online media, which republished the segment of the interview, exacerbating the campaign and inciting new attacks against the journalist. In connection with this case, AJM submitted a request to the Cybercrime and Digital Forensics Department of the Ministry of Interior, in order to shed light on the case and protect the journalist's safety.

INDICATOR 4.3

— ACTUAL ATTACKS

Score for 2023: 4.36 / Score for 2024: 4.22

Compared to 2023, when two cases of physical attacks on journalists and media workers were recorded, the situation in 2024 was the same, with two cases of this type recorded. In these cases, the competent authorities acted relatively efficiently and quickly. One case related to journalist Furkan Saliu is still in prosecution proceedings, while the second

case related to the burning of the motor vehicle of journalist and editor Blagoj Sersemov is still under investigation.

INDICATOR 4.4

— THREATS AND ATTACKS ON MEDIA AND JOURNALISTS' ASSOCIATIONS

Score for 2023: 4.53 / Score for 2024: 4.53

AJM did not register any attacks of this type in 2024. Compared to previous years, the score for this indicator remains unchanged.

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