



**safejournalists.net**

# **MONTENEGRO** **Indicators on the Level** **of Media Freedom and** **Journalists' Safety** **Index 2024**

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# About the project

## BACKGROUND OF THE INDICATORS

The journalists' associations from the Western Balkan countries, supported by the European Commission<sup>1</sup>, have established the platform Safejournalists.net to jointly monitor media legislation and practice in their countries and engage in advancing the legal and institutional environment in which journalists and other media professionals work. Every year, based on a carefully designed methodology<sup>2</sup>, the Safejournalists.net partners conduct advocacy research which has provided journalists' associations with evidence-based, reliable, and relevant data on the main problems and obstacles in the implementation of the EU standards in the field of media and journalists' freedom and safety in the Western Balkans. The results of the advocacy research give substance to partners' activities, providing them with new evidence and examples that refine and strengthen their advocacy positions.

The first qualitative research tool—*Indicators of the Level of Media Freedom and Journalists' Safety*—was initially developed in 2016 and has been gradually improved over the years. It consists of three groups of indicators: (A) Legal Protection, (B) Journalists' Position in the Newsroom, and (C) Journalists' Safety. Based on this monitoring tool, a total of seven assessments have been published, with the most recent covering the year 2022.

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

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- 1 In December 2022, the European Commission approved a new three-year cycle of the Project Safejournalists.net, which is a continuation of the previous two phases: the project Western Balkan's Regional Platform for advocating media freedom and journalists' safety (01.2016– 12.2018) and Safejournalist.net (02.2020–03.2023). The main objective of the Project is to empower and strengthen the role of the national journalists' associations, members of the Platform Safejournalists.net, to become effective and accountable independent actors in advocating and creating relevant media policies in their countries: Independent Journalists Association of Serbia (IJAS), Association of BH Journalists (BHJ), Croatian Journalists Association (CJA), Association of Journalists of Kosovo (AJK), Association of Journalists of Macedonia (AJM) and the Trade Union of Media of Montenegro (TUMM). 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 is designed and coordinated by Snezana Trpevska and Igor Micevski, research fellows of the Research Institute on Social Development RESIS, from North Macedonia ([www.resis.mk](http://www.resis.mk)).

the changes in the environment that have 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 Organisational Environment, (2) Due Prevention, (3) Due Process, and (4) Actual Safety. Based on this tool, a total of three research cycles were implemented: 2020 (pilot year), 2021 and 2022.

Starting from 2023, [Safejournalists.net](https://www.safejournalists.net) will combine the two (qualitative and quantitative) research tools into one 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, Kosovo<sup>3</sup> and Serbia.

## METHODOLOGICAL NOTE

The entire research process is divided into two phases: in the *first phase*, data is collected for 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 procedure of scoring and calculation of the Journalists' Safety Index is carried out.

A number of different research methods were applied to collect and analyze data related to each specific qualitative indicator:

- Review of studies, analyses, research reports, political documents, strategies, and other documents;
- Qualitative analysis of legal documents;
- Download and analysis of information published on the websites of public institutions and other organizations, and authorities;
- Finding and analyzing press releases, announcements, and other information issued by professional organizations;
- Secondary data collected by journalistic associations;
- In-depth interviews with experts, journalists, policy makers, etc.;
- Focus groups with journalists, and
- Polls with journalists (in some countries).

At the national level, advocacy research is conducted by national researchers who collect data and compile narrative reports, which are then reviewed by local media and legal experts and the lead researcher. In Montenegro,

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

the Trade Union of Media of Montenegro nominated Marijana Camovic-Velickovic as a national researcher and prof. Vuk Vukovic, Ph.D., as a media expert for reviewing reports, and Mirko Boskovic, M.Sc., as a legal expert.

Qualitative indicators of the level of media freedom and safety of journalists

The following table presents all qualitative indicators for the level of media freedom and safety of journalists, divided into three areas. These qualitative indicators are presented in descriptive or narrative form. Part of the indicators that are used in the conceptual framework for the Journalist Safety Index are marked in red letters.

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

A. Legal safeguards and their implementation	B. Journalists' position in the newsrooms	C. Journalists' safety
A.1 Basic guarantees for media and journalists' freedom and their application in practice	B.1 The job positions of journalists are stable and protected at the workplace	C.1 Journalists and media actors have access to immediate and effective protective measures
A.2 Independence and efficiency of the regulatory authority	B.2 Editorial independence in the private media	C.2 Journalists and other media actors have access to special protection or safety mechanisms
A.3 Independence and autonomy of the public service media	B.3 Editorial independence in the public service broadcasters	C.3 Female journalists have access to legal measures and support mechanisms when faced with gender-based threats, harassment or violence
A.4 Financial support to quality journalism and media content of public interest	B.4 Editorial independence in the not-for-profit media sector	C.4 Practice of regular public condemnation of threats and attacks on journalists and media has been established
A.5 State advertising in the private media sector	B.5 Freedom of journalists in the news production process	C.5 Police authorities are sensitive to journalists' protection issue
A.6 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	B.6 Working position of women journalists	C.6 Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists
A.7 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely		C.7 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)
A.8 Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities		C.8 Journalists and other media actors are efficiently protected from various forms of online harassment
A.9 Journalists are free to pursuit their profession and to establish, join and participate in their associations		C.9 Investigations of all types of attacks and violence against journalists and other media actors are carried out 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 harassments
		C.12 Threats against the lives and physical safety of journalists
		C.13 Actual attacks
		C.14 Threats and attacks on media outlets and journalists' associations

## JOURNALISTS SAFETY INDEX

Taking into consideration the standards and recommendations established by the Council of Europe and other international organisations, the concept of "journalists' safety"<sup>4</sup> was operationalized by considering the following four dimensions:

- I. **Legal and organisational environment** – the existence and implementation of legal safeguards relevant for the safety of journalists.
- II. **Due Prevention** – the existence and implementation of a range of preventative measures that have direct effects on journalists' protection and safety.
- III. **Due Process** – the behaviour of state institutions and public officials towards journalists and the efficiency of the criminal and civil justice system concerning the investigations of threats and acts of violence against journalists.
- IV. **Actual Safety** – incidents and instances 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 "journalists' safety" concept. Data for all these indicators were collected in the first phase of the research, and in the second phase, based on the collected research evidence, nine members of the Advisory Panel from each of the countries<sup>5</sup> assessed the situation and assigned scores for each of the 19 indicators:

*Overview of indicators related to the Journalists' Safety Index.*

I. Legal and Organisational 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 protective measures	3.1 Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists	4.1 Non-physical threats and harassments
1.2 Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities	2.2 Journalists and other media actors have access to special protection or safety mechanisms	3.2 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently	4.2 Threats against the lives and physical safety of journalists
1.3 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely	2.3 Female journalists have access to legal measures and support mechanisms	3.3 Journalists and other media actors are efficiently protected from various forms of online harassment	4.3 Actual attacks
1.4 Journalists are free to pursue their profession and to establish, join and participate in their associations	2.4 Practice of regular public condemnation of threats and attacks on journalists and media	3.4 Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently	4.4 Threats and attacks on media outlets and journalists' associations

<sup>4</sup> Researchers from the RESIS Institute ([www.resis.mk](http://www.resis.mk)), Snežana Trpevska, Igor Micevski and Ljubinka Popovska Toseva developed the [conceptual and methodological framework](#) for the Index and the model for its aggregation, weighting and calculation.

<sup>5</sup> Members of the Advisory Panel in [name of the country] were: [names of the members of the Advisory Panel].

I. Legal and Organisational Environment	II. Due Prevention	III. Due Process	IV. Actual Safety
1.5 The job positions of journalists are stable and protected at the workplace	2.5 Police authorities are sensitive to journalists' protection issue	3.5 Quality statistics collection systems established by state authorities to stem impunity	

## — LIST OF ABBREVIATIONS

TUMM – Media Trade Union of Montenegro

AEM – Agency for Electronic Media

AMU – Agency for Audiovisual Media Services

MONSTAT – Statistical Office

RTCG – National Public Broadcaster Radio and Television of Montenegro

EC – European Commission

NGO – Non-Governmental Organizations

ANB – National Security Agency

AZLP – Agency for Personal Data Protection and Free Access to Information

ODT – Basic State Prosecutor's Office

VDT – Supreme State Prosecutor

CC – Criminal Code

LPB – Local Public Broadcaster

# Introduction

According to its Constitution, Montenegro is defined as an independent and sovereign state with a republican form of government, as well as a civic, democratic, ecological state and a state of social justice, founded on the rule of law. However, deep divisions within society, particularly regarding national identity, remain strongly present and are often singled out as the main factor of internal instability. According to the latest population census, the results of which were presented in 2023, Montenegro has 623,600 inhabitants, of whom 41.12% identify as Montenegrins, 32.9% as Serbs, 9.45% as Bosniaks, 4.9% as Albanians, 2.06% as Russians, 1.63% as Muslims, while 2.88% chose not to declare their affiliation.

The Government of Montenegro, formed at the end of October 2023, was reconstructed for the first time in mid-2024, at the height of the tourist season. With a total of 32 members, including 27 ministries, the Montenegrin Government is one of the largest in the region and is composed of representatives of a large number of parties, many of which do not share the same values. In addition to the Prime Minister's *Evropa sad* Movement (PES) and its coalition partners, the government includes pro-Serbian parties from the coalition led by the Speaker of Parliament Andrija Mandić and MP Milan Knezevic, as well as the Bosniak Party, which had been a long-standing coalition partner of the previous Democratic Party of Socialists regime. While Spajic's PES is optimistic about the composition of the new executive, stating that it will be supported by two-thirds of MPs, critics—including President Jakov Milatović, until recently Spajic's associate—argue that the oversized government is the result of political bargaining.

Montenegro's membership in the European Union (EU) has nominally been one of the priorities of the current government, as well as of previous ones. In 2024, the country received a positive Report on the Fulfilment of Interim Benchmarks for Chapters 23 and 24 (IBAR) and also provisionally closed three negotiating chapters.

Prime Minister Milojko Spajic claims that they are “full of enthusiasm” to close the remaining 27 chapters by 2026 and that Montenegro will become the EU’s 28th member by 2028. The public has questioned how realistic this ambition is, while the European Commission (EC) welcomed Montenegro’s “ambitious plan” and stated that it is “ready to help the country in its ambition to move quickly.”

The polarization of the media landscape, a problem that has been recurring year after year, remains strongly pronounced. Instability on the political scene has also spilled over into the media. Over the past four years, since the change of government in Montenegro, four television broadcasters with national frequencies have changed their ownership structures and are now all majority-owned by foreign companies or individuals predominantly from Serbia. The national public broadcaster RTCG, as well as the private *TV E*, are the only television stations with national frequencies that are owned by Montenegro. A package of media laws was adopted in mid-2024, introducing a number of changes. Among other things, at the initiative of the Trade Union of Media of Montenegro (TUMM), journalists are now allowed to refuse to sign media content that is contrary to the law and the Code of Ethics, and they may seek compensation if such content damages their reputation. In addition, municipalities will be required to allocate higher percentages of their budgets to the operation of local public broadcasters, which according to expectations within the TUMM, should finally bring this segment of Montenegrin media financial stability.

In 2024, decisions were issued by the High Court in Podgorica confirming the rulings of the Basic Court in Podgorica that the Director General of RTCG, Boris Raonic, had been unlawfully appointed to that position. As a result, the Podgorica Basic State Prosecutor’s Office filed an indictment proposal against the president and four members of the RTCG Council.

Approximately 220 media outlets continue to operate on Montenegro’s small media market; however, due to the lack of statistical data, the number of people employed in the media sector, and how many of them are journalists, remains unknown. During 2024, wages in the media sector, as in the rest of the country, increased as a result of the implementation of the Europe Now 2 programme, but the earnings of media workers remain below the national average. The Ministry of Culture and Media still does not have precise data on the amounts that state institutions and enterprises allocate for advertising in the media. Censorship and self-censorship remain among the biggest problems within the media community.

In 2024, the Safejournalists.net database recorded 24 attacks, threats, and forms of pressure against journalists, while the Police Administration registered 16 attacks during the same period. The number of attacks is significantly higher than in 2023, when there were 16 cases; however, beyond the quantitative increase, the nature of the attacks is also concerning, such as the brutal physical assault on *Pobjeda* journalist Ana Raickovic. The number

of incidents involving high-ranking public officials as perpetrators was also notable, including the President of the state Jakov Milatovic, Deputy Prime Minister Niko Deljosaj, and the then Minister of Justice Andrej Milovic.



# Media freedom and journalists' safety in Montenegro – Indicators

## A. LEGAL SAFEGUARDS FOR MEDIA FREEDOM AND THEIR IMPLEMENTATION

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

The right to freedom of expression is guaranteed by the Constitution and media laws, including the right to access the Internet, and is generally respected. After three years of work, three media laws were amended in mid-year, introducing certain changes to the media sphere<sup>6</sup>. With their adoption, Negotiating Chapter 10 relating to the information society and media in Montenegro's EU accession process was provisionally closed. These laws are the The Law on Media, the Law on the National Public Broadcaster Radio and Television of Montenegro, and the Law on Audiovisual Media Services. Although the process preceding the adoption of the laws was inclusive, toward the very end, when the laws were already in parliamentary procedure, a non-transparent and controversial amendment was introduced to the draft Law on the National Public Broadcaster, specifically lowering the criteria for the selection of the Director General<sup>7</sup>. This triggered protests from part of the civil society sector that had participated in the working group, as well as opposition from within the Ministry of Culture and Media itself.<sup>8</sup>

There were no public complaints indicating that the right to use the Internet had been restricted in any way.

Funding for RTCG remains stable, and the latest changes in this area were made at the end of 2023, when it was decided in a non-transparent

6 Trade Union of Media of Montenegro, „Šta nam je Zakon o medijima donio“, [What Has the Media Law Brought Us], May15, 2025

7 Monitor.co.me, „Pripremne radnje za novog, starog direktora RTCG: Ostavka bez smjene“, [Preparatory Steps for the New, Old Director of RTCG: Resignation without Dismissal], May 15, 2025

8 Monitor.co.me, „Javni servis, nivelisanje amandmanima: RTCG po volji partija“, [Public Broadcaster, Leveling through Amendments: RTCG According to the Will of Political Parties,], May 15, 2025

manner<sup>9</sup> that, instead of 0.3% of gross domestic product, RTCG would, from 2024 onward, be financed with 1.3% of the current state budget. In monetary terms, this amounts to approximately €1.2 million less than under the original model, but the RTCG budget remains exceptionally generous. The year was also marked by scandals related to the unlawful appointment of the RTCG Director General<sup>10</sup>, as well as court proceedings against the majority of Council members, whom the state prosecution accuses of abuse of office<sup>11</sup> in co-perpetration due to the repeated unlawful appointment of the same person to the top position at the public broadcaster.

The implementation of the first Media Strategy<sup>12</sup> which, as an integral part of media freedom, also addresses the working conditions of media employees and includes a series of measures aimed at improving them, has begun at the initiative of the TUMM, but without any visible effect.

The introduction of licenses for journalists was not a topic of public debate during the year, nor were any such initiatives voiced. More than 220 media outlets operated throughout the year, while re-registration in accordance with the new Law on Media is still ongoing<sup>13</sup>. The law now provides for the mandatory registration of all online portals as well as self-regulation, which has led to a drastic increase in the number of media outlets that have regulated this segment. Previously, only 17 media outlets were gathered within the Media Self-Regulatory Council; this number has now risen to as many as 67. The self-regulatory council for local print media brings together an additional six outlets, while 18 media organizations have appointed ombudspersons.<sup>14</sup>

## — A.2 INDEPENDENCE AND EFFICIENCY OF THE REGULATORY AUTHORITY

In 2024, the Law on Audiovisual Media Services was also adopted, guaranteeing the independence and increasing the efficiency of the regulator (the Agency for Audiovisual Media Services – AMU). Following the adoption of the law, it was necessary to announce a public call within six months for the selection of new members of the AMU Council, as the criteria for Council members were tightened, the selection procedure was amended, and the composition of the Council (authorized nominators) was changed. The amendments to the law relate, among other things, to an increase in the number of authorized nominators.<sup>15</sup> However, the President of the Parliament of Montenegro, Andrija Mandić, announced the call for the selection of two new members of the AMU Council

9 Government of Montenegro, „Spajic sa Raonicem o izmjenama zakona o nacinu finansiranja Javnog servisa“, [Spajic Meets with Raonic on Amendments to the Law on the Method of Financing the Public Broadcaster], Dec 27, 2023

10 Cetinjskolist.com, „Vrhovni sud odbio reviziju koju je tražio RTCG: Raonic nezakonito imenovan u avgustu 2021.“, [Supreme Court Rejects the Revision Requested by RTCG: Raonic Illegally Appointed in August 2021], May 15, 2025

11 Pobjeda.me, „Predsjednik i cetiri clana Savjeta RTCG okrivljeni da su zloupotrijebili položaj“, [President and Four Members of the RTCG Council Accused of Abuse of Office], May 15, 2024

12 Government of Montenegro, „Usvojena prva Medijska strategija 2023 – 2027. koja ce doprinijeti unapređenju ambijenta za slobodno i profesionalno novinarstvo“, [The First Media Strategy 2023–2027 Adopted, Which Will Contribute to Improving the Environment for Free and Professional Journalism], Oct 19, 2023

13 Official letter from the Ministry of Culture and Media, May 20, 2025

14 Ibid

15 [Zakon o audiovizuelnim medijski uslugama](#), [Law on Audiovisual Media Services]

with a delay, failing to respect the deadline requiring the call to be issued six months before the expiration of the mandates of the current members, and the appointments have not taken place<sup>16</sup>. Legal experts and media specialists pointed to political abuses in the appointment process for the AMU Council.<sup>17</sup>

There were no significant public criticisms of the regulator's work. No objections were raised regarding AMU decisions related to the allocation of licenses to electronic media.

Even after the adoption of the new law, the AMU does not have jurisdiction over online portals and internet publications (except with regard to video content on portals), and no authority is responsible for overseeing their content. During 2024, the AMU issued 179 warnings to broadcasters, either *ex officio* or following complaints, which is almost twice as many as in 2023, when 96 warnings were issued.

### — A.3 INDEPENDENCE AND AUTONOMY OF THE PUBLIC SERVICE MEDIA<sup>18</sup>

The independence of RTCG is guaranteed by law and by-laws; however, criticism of the public broadcaster's work due to political influence by ruling parties remains frequent.

"The authorities have obtained what they like most: microphones and cameras without questions, transmitters of PR information and pre-packaged media content."<sup>19</sup>

In its Report on Montenegro, the European Commission stated that in the coming year RTCG must be "protected from any form of undue influence on its editorial, institutional, or financial independence, and RTCG must fully comply with the law and the highest standards of professional integrity and accountability."<sup>20</sup> It was also noted that in August, the Council once again appointed the same person as Director General, and that this decision also led to court disputes and doubts regarding its legality.

"Respect for final and binding court judgments is an imperative for every member of the Council of Europe, let alone for a candidate for European Union membership, which makes it surprising that there is such a consensus around the non-compliance with final court rulings and the persistence in disregarding them."<sup>21</sup>

A similar scenario involving a problematic council and director has also unfolded at the local public broadcaster *RTV Podgorica*<sup>22</sup>. Toward the end of 2023, a new Council

16 Portalanalitika.me, „Savjet AMU zarobljen, Crna Gora pred novim poniženjem u Briselu“, [AAMS Council Captured, Montenegro Facing a New Humiliation in Brussels] May 15, 2025

17 Safejournalistst.net, „Spaić: Nepoštovanje medijskih zakona kompromituje prikljućivanje Crne Gore Evropskoj uniji“, [Spaić: Disregard for Media Laws Compromises Montenegro's Accession to the European Union], Aug 20, 2025

18 The part of the report relating to the public broadcaster RTCG was written by media expert Drazen Duraskovic from the Trade Union of Media of Montenegro, in order to avoid a conflict of interest for the author, who is also a member of the RTCG Council.

19 Vijesti.me, „Kako je RTCG napustio Herceg Novi ili esej o neznanju“, [How RTCG Left Herceg Novi, or an Essay on Ignorance], Aug 20, 2025

20 European Commission, *Izveštaj za Crnu Goru 2024*, [Montenegro Report 2024], p. 8

21 Safejournalistst.net, „Spaić: Nepoštovanje medijskih zakona kompromituje prikljućivanje Crne Gore Evropskoj uniji“, [Spaić: Disregard for Media Laws Compromises Montenegro's Accession to the European Union], Aug 20, 2025

22 B.B., RTCG, „Izabran novi Savjet RTV Podgorica“, [New Council of RTV Podgorica Elected], Nov 30, 2023

was appointed under new rules introduced by the new political majority at the local level, which subsequently, under questionable circumstances, appointed<sup>23</sup> a new acting Director General of the local broadcaster<sup>24</sup>. In court proceedings, the candidate for the position of acting executive director of *RTV Podgorica* proved that the procedure had been unlawful, but this did not produce any legal consequences.<sup>25</sup>

The method of financing RTCG was changed at the very end of 2023<sup>26</sup> in a controversial manner, as the Prime Minister agreed on amendments to the Law on the National Public Broadcaster during a meeting with the Director General of RTCG<sup>27</sup>, who had been appointed in a manner indicating corruption<sup>28</sup> among the Council members who selected him, without public participation and contrary to the draft law agreed upon by the working group and submitted to foreign experts for review. Instead of the previous 0.3% of gross domestic product, RTCG will receive 1.34% of the current state budget, which represents a smaller amount.

The RTCG Council operated in an incomplete composition, and during the year one member was reappointed<sup>29</sup>, one newly appointed, while another resigned<sup>30</sup> after the court finally and bindingly determined that the appointment of the Director General in which he had participated was unlawful. Previously, one Council member<sup>31</sup> had resigned following a final court ruling which established that the Director General had been appointed in 2021 at a time when he was in a conflict of interest and therefore could not lawfully perform that function.<sup>32</sup> Contrary to the court's decision, the Council once again appointed the same person to the position, which led the Basic State Prosecutor's Office to initiate criminal proceedings against five Council members, including the president, for abuse of office committed in co-perpetration.<sup>33</sup>

As regards local public broadcasters established by municipalities, the situation began to improve toward the end of 2024, as the new Law on Audiovisual Media Services significantly increased allocations from local budgets for the operation of these media outlets, under a special scheme that takes into account the total amount of the current municipal budget as well as whether the local public broadcaster operates only a radio service or also a television channel and a portal.

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- 23 Gradski.me, „[Vladimir Otašević izabran za direktora Gradske RTV](#)“, [Vladimir Otasevic Elected Director of Gradska RTV], Feb 13, 2024
- 24 Ne.V, Vijesti.me, „[Media centar: Savjet RTV Podgorica krivичno odgovoran ukoliko se izabere direktor suprotno zakonskim procedurama](#)“, [Media Center: RTV Podgorica Council Criminally Liable if Director Is Elected Contrary to Legal Procedures], Feb 13, 2024
- 25 Vijesti.me, „[Otašević nezakonito biran ali ostaje u fotelji](#)“, [Otasevic Illegally Elected but Remains in Office], July 20, 2025
- 26 Dan portal, „[Spajić-Raonić: Izmjenama zakona o načinu finansiranja Javnog servisa garantuje se nezavisnost RTCG-a](#)“, [Spajić–Raonic: Amendments to the Law on the Method of Financing the Public Broadcaster Guarantee RTCG's Independence] Dec 27, 2023
- 27 Adria.tv, „[Media centar: Vlada bez javne rasprave predložila izmjene Zakona o RTCG kojima se ukida finansijsku nezavisnost javnog servisa](#)“, [Media Center: Government Proposed Amendments to the Law on RTCG Without Public Debate, Abolishing the Public Broadcaster's Financial Independence], Dec 12, 2023
- 28 Agency for the Prevention of Corruption, „[Mišljenje br. 03-02-24-24-6](#)“, [Opinion No. 03-02-24-24-6]
- 29 Antenam.net, „[Za članove Savjeta RTCG izabrani Zoric i Drekalovic](#)“, [Zorić and Drekalović Elected as Members of the RTCG Council], May 15, 2025
- 30 Cdm.me, „[Predrag Miranovic podnio ostavku na članstvo u Savjetu RTCG-a](#)“, [Predrag Miranović Resigns from Membership in the RTCG Council], May 15, 2025
- 31 Pobjeda Editorial Board, Pobjeda.me, „[Baća podnio ostavku u Savjetu RTCG](#)“, [Baca Resigns from the RTCG Council], June 01, 2023
- 32 Komatina, Ana, Vijesti.me, „[Raonić ponovo izabran za generalnog direktora RTCG-a](#)“, [Raonic Re-elected as Director General of RTCG], June 01, 2023
- 33 Vijesti.me, „[Optužni predlog protiv predsjednika i članova Savjeta RTCG zbog nezakonitog imenovanja Borisa Raonica](#)“, [Indictment Proposal Against the President and Members of the RTCG Council for the Illegal Appointment of Boris Raonić], May 15, 2025

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

Since 2021<sup>34</sup>, there has been a Fund for the Promotion of Media Pluralism, financed from the state budget with a fixed allocation of 0.09% of gross domestic product. With the adoption of the Law on Media in June 2024, this amount was increased to 0.20% of the current state budget. From the portion of the Fund allocated to electronic media, in June 2024 the AMU distributed €538,821 to commercial broadcasters for the production of media content of public interest. Eleven radio and television broadcasters were supported, with an obligation to produce 35 media outputs. From the portion of the Fund administered by the Ministry of Culture and Media and allocated to print media and online portals, €486,344 was distributed for a total of 57 projects, allocated across 43 media outlets and three self-regulatory bodies.

The Parliament of Montenegro finances the only weekly newspaper in the Albanian language, *Koha Javore*, with €150,000 annually.

#### — A.5 STATE ADVERTISING IN THE PRIVATE MEDIA SECTOR

The state advertises in private media, but data on the amounts spent and the media outlets in which advertising is placed remain unavailable, despite the obligation to report revenues from this type of marketing having existed since the beginning of 2021, when provisions of the Law on Media related to transparent advertising entered into force. The Report on the Transparency of Media Financing from Public Revenues for 2024<sup>35</sup> shows that advertising data were submitted by 113 out of 217 media outlets that were at the time entered in the records of the Ministry of Culture and Media and the register of the Agency for Audiovisual Media Services, representing 52% of registered media. Compared with the previous reporting period (2023), there was a slight decline in the number of media outlets that submitted transparency data on financing from public revenues: the year before, 56% had done so, although at that time only 198 media outlets were registered. Out of a total of 681 public sector entities, 419 submitted the required data, representing 62%, which also marks a decrease compared to the previous year, when 64% of public sector entities submitted transparency data.

The allocation of state funds for advertising purposes remains non-transparent<sup>36</sup>, and data from two sources differ. As a result, it is not possible to draw a clear conclusion as to whether there is any form of favoritism toward certain media outlets or political influence, which was one of the key intentions behind the drafting of the Law on Media.

34 Government of Montenegro, „[Informacija o Fondu za podsticanje pluralizma i raznovrsnosti medija](#)“, [Information on the Fund for the Promotion of Media Pluralism and Diversity], Oct 28, 2021.

35 Ministry of Culture and Media, [Izveštaj o o transparentnosti finansiranja medija iz javnih prihoda za 2024. godinu](#), [Report on the Transparency of Media Financing from Public Funds for 2024], June 02, 2025

36 Ibid.

Under the Law on Media, there is an obligation for advertising data to be submitted once a year<sup>37</sup>, by the end of March of the current year for the previous year, to the Ministry of Culture and Media, which is required to publish a consolidated report. As this has not been happening, the initiation of proceedings has been announced, but the Ministry has not yet begun to exercise this statutory authority.

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

The Law on Obligations<sup>38</sup> and the Law on Media protect personality rights in the media through civil litigation and provide sufficient freedom for media outlets and journalists to perform their work without pressure. Defamation was decriminalized in 2011, and since then there have been no concrete proposals to re-criminalize it. Proceedings against historian and columnist Boban Batricevic<sup>39</sup> were discontinued; the Basic State Prosecutor's Office had initiated the case *ex officio* before the Misdemeanor Court, which constituted a precedent.

According to data from basic courts<sup>40</sup>, 31 proceedings for violations of personality rights were initiated during the year against journalists and media outlets, representing an increase compared to 2023, when there were 25 such cases.

Proceedings initiated by two journalists against BIRN<sup>41</sup> have continued; in a 2022 article, BIRN mentioned their names as part of a list of right-wing organizations in Montenegro.

Fear of lawsuits for damage to honor and reputation does not significantly affect journalists' work<sup>42</sup>, and many say that the large number of lawsuits from earlier periods has encouraged them to exercise greater journalistic due diligence in reporting. While there were previously cases in which lawsuits were filed solely to create a chilling effect, journalists note that "there is no fear, especially if what you have written is accurate and fully substantiated, but there is an uncomfortable feeling that employers do not provide adequate legal support and engage law firms that are not sufficiently specialized in media law"<sup>43</sup>.

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

The law does not address SLAPP lawsuits in any specific manner, nor are there protective mechanisms in court practice, such as the early dismissal of such lawsuits when they arise. SLAPP cases are rare, and those that do occur

37 Ibid.

38 [Zakon o obligacionim odnosima](#), [Law on Obligations] Article 151

39 [Slobodnaevropa.org, „Obustavljen postupak protiv crnogorskog profesora koji je kritikovao SPC“](#), [Proceedings Suspended against a Montenegrin Professor Who Criticized the Serbian Orthodox Church], May 15, 2025

40 TUMM's data

41 [Mihajlovic, Duško, Pobjeda.me, „Podnijete tužbe za klevetu protiv BIRN-a u Sarajevu, u Podgorici protiv Jovanovic i Tomovic“](#) [Defamation Lawsuits Filed against BIRN in Sarajevo, and in Podgorica against Jovanovic and Tomovic], Feb 15, 2023

42 Focus group with journalists II, Mar 27, 2025

43 Focus group with journalists I, Feb 01, 2025

are mostly covered by the media. A first-instance ruling by the Basic Court in Podgorica found that the honor and reputation of RTCG employee Vladana Vucinic had not been violated in a case she brought against two media outlets, a member of the RTCG Council, and a private citizen<sup>44</sup> for commenting on and publishing information related to her unlawful salary increase. A decision by the High Court is pending following Vucinic's appeal, in which she sought €12,000 in damages to be paid jointly by the defendants.

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

Amendments to the Law on Media in 2024<sup>45</sup> clarified that journalists are not obliged to disclose their sources of information, except when such disclosure is requested by a state prosecutor and confirmed by a competent court, and solely for the purpose of protecting national security interests, territorial integrity, or public health. No cases of abuse of this legal provision were recorded during 2024.

There were no new cases in which journalists or media outlets were required to reveal their sources of information, nor did journalists report any difficulties in meeting with or maintaining contact with their sources.<sup>46</sup>

#### — A.9 JOURNALISTS ARE FREE TO PURSUIT THEIR PROFESSION AND TO ESTABLISH, JOIN AND PARTICIPATE IN THEIR ASSOCIATIONS

Journalists are not required to be licensed, and the definition of a journalist in the new 2024<sup>47</sup> Law on Media is quite broad; however, it does not envisage any requirement for journalists to hold a license or registration.

Occasionally, issues arise related to the accreditation of journalists at certain events<sup>48</sup>, but these are usually resolved through dialogue with the organizers.

Freedom of association is guaranteed, but this right is not frequently exercised, as journalists often have reservations about the motives of those leading professional associations and do not perceive them as serving their interests as journalists<sup>49</sup>. Three journalists' associations operate in Montenegro, only one of which is active, mainly in terms of organizing occasional training. However, two national trade unions operate in Montenegro, with the Trade Union of Media of Montenegro being larger and more visible in the public sphere. Its members continue to report

44 Slobodnaevropa.org, „Obustavljen postupak protiv crnogorskog profesora koji je kritikovao SPC“, [Proceedings Suspended against a Montenegrin Professor Who Criticized the Serbian Orthodox Church], May 15, 2025

45 [Zakon o medijima](#) [Law on Media]

46 Focus group with journalists II, Mar 27, 2025

47 [Zakon o medijima](#) [Law on Media]

48 Focus group with journalists II, Mar 27, 2025

49 Ibid

problems related to union membership, including anti-union discrimination and even bans on union organizing.

## — A.10 RIGHT TO ACCESS OFFICIAL DOCUMENTS AND INFORMATION

According to data from the Agency for Personal Data Protection and Free Access to Information (AZLP)<sup>50</sup>, journalists submitted 172 requests for free access to information to state authorities during 2024, which is as many as 103 more requests than in the previous year. “The number of rejected requests was 47, while 31 requests for free access to information were partially granted.”<sup>51</sup> Journalists filed a total of 59 appeals, of which 9 were upheld due to violations of procedural rules or administrative silence, while as many as 37 cases were returned for reconsideration and renewed decision-making. Institutions that refused to provide information included Airports of Montenegro, the High Court, the Agency for Quality Assurance in Higher Education, EPCG Solar Gradnja Niksic, the Ministry of Spatial Planning, Urbanism and State Property, the Electric Power Company of Montenegro, the Ministry of the Interior, the National Security Agency, and the Protector of Property and Legal Interests.<sup>52</sup>

Nevertheless, the main resource through which journalists obtain official information and documents remains the service provided by MANS<sup>53</sup>, which journalists contacted 847 times during 2024.<sup>54</sup>

Recorded material in which ministers address the public directly, distributed to media by their PR services, as well as messages sent via the X (Twitter) platform, are the most common forms of communication with the public.<sup>55</sup> Government sessions are no longer broadcast live via YouTube, and the public has also criticized the fact that most decisions are made via WhatsApp, i.e., during electronic sessions.<sup>56</sup> Favored media outlets and journalists continue to exist and receive exclusive information.

The work of the courts is generally assessed as transparent, but the limited capacity of courtrooms remains a restricting factor, as some journalists are unable to secure space in the courtroom and report without obstruction.<sup>57</sup>

For almost five years now, RTCG has operated a Parliamentary Channel that broadcasts all parliamentary plenary sittings and committee sessions, which can be followed live and are also aired in reruns. In addition, the Parliament has a YouTube channel where recordings remain available for later viewing. During 2024, through communication

50 Agency for Personal Data Protection and Free Access to Information, Letter No. 07-43-229-2/25 of Jan 27, 2025

51 Ibid.

52 Ibid.

53 Mans.me, [Brže do informacija uz novu mobilnu aplikaciju MANS-a](#), [Faster Access to Information with MANS's New Mobile Application]

54 Official letter of the Network for the Affirmation of the NGO Sector (MANS), Mar 01, 2025

55 Focus group with journalists II, Mar 27, 2025

56 Portalanalitika.me, [“CGO: Vlada strateški važne odluke donosi na telefonskim sjednicama – neozbiljno je voditi državu na „seen” i „like”](#), [CCE: The Government Makes Strategically Important Decisions at Telephone Sessions – It Is Unserious to Run the State on 'Seen' and 'Like'], Aug 20, 2025

57 Focus group with journalists II, Mar 27, 2025

between the Trade Union of Media of Montenegro (TUMM) and other media organizations with Parliament, improved conditions for reporting from the legislature were secured.

## B. JOURNALISTS' POSITION IN THE NEWSROOMS

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

According to data from the Ministry of Culture and Media, by mid-2024 there were 194 media outlets operating in Montenegro, of which 110 were online portals, many of them with only one or no employees at all.<sup>58</sup> Under the new Law on Media, all of them were required to re-register; however, this process is still ongoing, so the final number of active and registered media outlets remains unknown.<sup>59</sup>

A survey<sup>60</sup> conducted by the Trade Union of Media of Montenegro (TUMM) showed that although the majority of respondents, 89%, work full-time, 6.2% report having an unregulated status in newsrooms, as they are engaged on a freelance or contract basis.

The majority of media workers in Montenegro continue to earn salaries below the national average. In 2024, two-thirds of employees (66.6%) earned less than €1,012, which is the average salary at the national level.<sup>61</sup> As many as 16% of respondents earn less than €800, which is the legal minimum wage for employees with higher education. A significant share of respondents (42%) stated that their socio-economic position has improved over the past three years, while around 30% believe there have been no changes, and every fourth participant assesses that their situation has worsened. A large majority (85%) reported that their salary had increased, and for almost 30% of them the increase amounted to around €200.

Additionally, 26% of respondents reported salary increases between €100 and €150, while almost one in four cited an increase of around €100. These salary increases in the media sector, particularly in private media, are attributed to the implementation of the tax reforms *Evropa sad 1 i 2*, which abolished health insurance contributions and reduced pension contributions.

When asked whether their salary is fixed, the majority (74%) answered in the affirmative. However, nearly one in four respondents reported having insecure income: almost 10% receive a combination of fixed and variable pay, more than 11% have a "predominantly fixed" salary, while for 3.7% earnings "mostly depend on performance."

Most respondents (70%) also stated that they receive their salary regularly. Nevertheless, for one in five respondents regular payment is not guaranteed, while 3.7% said their earnings are not regular at all.

58 Trade Union of Media of Montenegro, "[Poslovanje medija u Crnoj Gori u 2024. godini](#)", [Media Operations in Montenegro in 2024], Podgorica: 2025

59 Official letter from the Ministry of Culture and Media, May 20, 2025

60 The research, conducted as part of the regular monitoring of the socio-economic status of media workers, included 81 respondents—female and male journalists, editors, correspondents, and other media professionals

61 Monstat, "[Prosječne zarade \(plate\)](#)", [Average salaries], Jan 31, 2025

One in four respondents said they usually work more than eight hours a day, and the vast majority (92%) stated that they sometimes or often work overtime. However, in 60% of cases this overtime work is unpaid. In addition, half of the employees often work on weekends, and in 42% of cases Sunday work is not additionally compensated, despite this being an obligation under the General Collective Agreement.

In Montenegro, collective agreements that provide additional protection for employees currently exist only in public broadcasters, Radio and Television of Montenegro (RTCG) and RTV Budva. However, the collective agreement at RTV Budva dates back to 2017, and most of its provisions are no longer applied in practice.

Problems related to anti-union discrimination against media workers and bans on union organizing in some private media outlets continue to be reported. In the TUMM survey, 74% of respondents reported being members of a trade union, but the fact that 6.2% stated they are not free to join is a cause for concern. Two-thirds of respondents (67.9%) said they are not members of any journalists' association.

## — B.2 EDITORIAL INDEPENDENCE IN THE PRIVATE MEDIA

Editorial offices of most private media outlets in Montenegro do not have documents defining the separation between editorial work and management or marketing, but instead cooperate closely. As a result, articles sometimes appear on portals where it is difficult to discern that the content is promotional, as it is written by journalists or presented in a way that does not clearly indicate at first glance that it is paid content.

Most private media outlets do not have internal ethical codes or rules that would ensure the independence of editorial teams from media owners or governing bodies. However, some outlets—such as the daily *Vijesti*<sup>62</sup> and the *Mina News Agency*<sup>63</sup> began adopting such regulations as early as 2021. All private media rely on the general Code of Journalists, whose amendment has been announced.

Journalists continue to report that they are unable to cover all topics of public interest and that each newsroom has certain limitations, which in most cases relate to major advertisers and business partners of the media they work for. Another problem concerns topics involving politicians or policies with whom media owners have certain connections or close relationships, which in turn shapes editorial policy.<sup>64</sup>

62 [Vijesti.me](#), „[Eticke smjernice redakcije](#)“, [Editorial Ethical Guidelines]

63 [Mina News Agency](#), „[Eticki kodeks novinske Agencije Mina](#)“, [Code of Ethics of the Mina News Agency]

64 Focus group with journalists II, Mar 27, 2025

## — B.3 EDITORIAL INDEPENDENCE IN THE PUBLIC SERVICE MEDIA

RTCG has an Ethical Code<sup>65</sup> that was amended in 2024 and contains numerous restrictions that limit freedom of expression. The Code was revised after several announcements and failed attempts that were also aimed at restricting freedoms, particularly freedom of speech and the use of social media by employees. Ultimately, a problematic text with similar provisions was adopted, despite warnings that the document was unconstitutional.<sup>66</sup> A positive aspect is that the Ethical Code is not being applied, as the Ethical Committee responsible for its implementation has not yet been established. Several attempts to appoint, through a public call, a member of the Committee representing the professional public failed due to a lack of interested candidates. After multiple repeated calls and considerable controversy<sup>67</sup>, a new ombudsman<sup>68</sup> was appointed, after which the remaining candidates filed a criminal complaint alleging irregularities.<sup>69</sup> Basic professional and ethical rules are not applied consistently, as previously pointed out by the former RTCG ombudsman in their reports<sup>70</sup>, and this is also evident in individual reports by the new ombudsman, who, however, does not publish quarterly reports.

The most important governing act of RTCG is the Statute, which formally does not separate the editorial function from governing bodies and does not address this issue. The key governing body of RTCG is the Council, which was constituted in mid-2021 and whose composition has changed slightly due to resignations.<sup>71</sup> The Basic State Prosecutor's Office initiated criminal proceedings against five members of the Council for abuse of official position committed in co-perpetration, because, contrary to a final court judgment, they reappointed as Director General a person who, according to that judgment, was not eligible for appointment.<sup>72</sup>

"It has been unequivocally established that on 1 June 2023, at a Council session, the President of the RTCG Council, Veselin Drljević, by including Boris Raonić on the list of candidates for the election of the Director General, together with four other Council members, violated a final court judgment and committed the criminal offence of failure to enforce a court decision under Article 395 of the Criminal Code of Montenegro, which is why the Basic State Prosecutor's Office submitted an indictment proposal."<sup>73</sup>

65 RTCG Council, „[Eticki kodeks RTCG](#)“ [RTCG Code of Ethics]

66 TUMM, „[Eticki kodeks suprotan zakonu, zaposleni da nam se obrate](#)“, [Code of Ethics Contrary to the Law; Employees Should Contact Us], Mar 27, 2025

67 PCNEN, „[Odstupio tek izabrani ombudsman RTCG](#)“, [Newly Elected RTCG Ombudsman Resigns], Mar 27, 2025

68 Antena M, „[Ivanovic novi ombudsman RTCG, Camovic – Velickovic clanovima Savjeta: Spuz vam se primakao](#)“, [Ivanovic Appointed as New RTCG Ombudsman; Camovic–Veličković to Council Members: Spuz Is Closing In on You], Mar 27, 2025

69 Vijesti.me, „[Pejovic i Bozovic podnijeli tuzbu zbog izbora ombudsmana RTCG, Ivanovic najmanje radio u medijima](#)“, [Pejovic and Bozovic File Lawsuit over the Election of the RTCG Ombudsman; Ivanovic Has the Least Media Experience], Mar 27, 2025

70 RTCG Ombudsman, „[Izveštaj Ombudsmana za period septembar–decembar 2023. godine](#)“ [Ombudsman's Report for the Period September–December 2023]

71 Rtcg.me, „[Miranovic podnio ostavku u Savjetu](#)“, [Miranovic Resigns from the Council], Mar 27, 2025

72 State Prosecutor's Office of Montenegro, „[Podnjet optuzni predlog zbog zloupotrebe službenog položaja](#)“, [Indictment Proposal Filed for Abuse of Official Position.], Mar 27, 2025

73 Media centar.me, „[ODT da podnese optuzni predlog protiv Raonica zbog podstrekavanja na vršenje krivичnih djela](#)“, [Call for the Basic State Prosecutor's Office to File an Indictment Proposal against Raonić for Incitement to Commit Criminal Offences], June 10, 2025

Journalists continue not to report direct pressure coming from politicians; politicians do not contact them directly, but rather communicate through editors and directors who are in contact with them.<sup>74</sup>

Political influence over the public broadcaster remains evident and is frequently alleged.<sup>75</sup> It manifests itself through the dismissal of editors deemed politically unsuitable and the employment of new ones considered suitable. This is not officially discussed, but can be observed through programming, invited guests, positions taken, as well as through journalists' testimonies.<sup>76</sup>

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

In Montenegro, there are two non-profit radio stations<sup>77</sup> (*Radio Fatih* and *Radio Svetigora*). *Radio Svetigora* obtained non-profit broadcaster status at the end of 2022. This sector is quite underdeveloped, and over the course of the year the number of such media outlets has decreased. The category is recognized in the Law on Audiovisual Media Services, which prescribes rules regarding programme structure that these broadcasters must comply with in order to retain their status. According to the records of the Ministry of Culture and Media, 13 non-profit print media outlets are registered.

There are also several non-profit online portals that are financed through donations and projects. However, they most often do not have formal newsrooms or permanent staff, instead engaging journalists on a case-by-case basis depending on project activities.

There is no available data regarding *Radio Fatih* in terms of finances or number of employees, while *Svetigora* has reported three employees. As these are religious radio stations, news and information are not their primary focus, which is why there is no data on ethical rules or editorial independence.

A non-profit online medium is PCNEN<sup>78</sup>, which is project-funded and has limited influence and readership.

No information has reached the public about any form of pressure on non-profit media, including those operating within non-governmental organizations that engage in investigative journalism and research related to corruption and crime through project-based activities.

74 Focus group with journalists II, Mar 27, 2025

75 [Espona.me](#), "DPS: Tužilaštvo nastavlja da žmuri na nezakoniti rad Savjeta RTCG koji je produžena ruka PES-a i bivšeg DF-a", [DPS: The Prosecutor's Office Continues to Turn a Blind Eye to the Illegal Work of the RTCG Council, Which Is an Extended Arm of PES and the Former DF,], June 10, 2025

76 Focus group with journalists I, Mar 2025

77 Agency for Audiovisual Media Services, [Spisak neprofitnih radio emitera](#), [List of Non-profit Radio Broadcasters], June 15, 2025

78 PCNEN, ["O nama"](#), [About us]

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

Respondents who participated in the TUMM survey<sup>79</sup> were asked to rank potential sources of influence on their work. They identified journalistic ethics as the most significant factor, with 98% of respondents stating that it has an extremely strong, strong, or partial influence on their work. This is followed by media regulation and laws (91%), personal values and beliefs (78%), and editors (74%). The role of internal newsroom structures stands out in particular: connections with editors influence journalists in around 60% of cases, as do media owners (57%). Editorial policy is also recognized as a significant source of influence, as confirmed by 51% of respondents. Less intensive sources of influence include politicians (36%), censorship (35%), the business sector (32%), and government officials (28%).

Despite this, the subjective perception among respondents is that they enjoy a high degree of freedom in their work. Nearly three quarters of respondents (72%) report having absolute or a high level of freedom, while around 25% claim to have a certain degree of freedom or little to no freedom. When it comes to freedom in choosing interviewees, the perception of freedom is even higher: 78% report absolute or a high level of freedom, 17.3% report a certain degree of freedom, and 3.7% report little or no freedom.

Censorship and self-censorship remain prevalent, as shown by the TUMM survey. When asked whether they had situations in which they had to censor content, almost one third of respondents (30.9%) stated that such cases had occurred. In addition, more than one third (37%) reported that they had experienced some form of political interference or pressure during their work.

## — B.6 WORKING POSITION OF WOMEN JOURNALISTS

A non-transparent wage system prevents women from knowing precisely whether they receive equal pay for equal work compared to their male colleagues. Although many believe that pay inequality does exist, women tend to advance more slowly in their careers and most often occupy lower-level positions.<sup>80</sup> Editors-in-chief are rarely women, although women are represented in lower editorial positions that require a high level of work and commitment. According to available data, more than 60% of media employees are women; however, none of the three daily newspapers in Montenegro has a woman as editor-in-chief. Data published in the mastheads of the three daily newspapers show that women are not equally represented even in lower editorial positions. Women do hold director-level positions in local public broadcasters and in several private television stations with national coverage. In print media, there are female directors (*Vijesti*), as well

79 Trade Union of Media of Montenegro, "[Poslovanje medija u Crnoj Gori u 2024. godini](#)", [Media Operations in Montenegro in 2024], Podgorica: 2025

80 TUMM, "Bezbjednost novinarki 2024", [Safety of Women Journalists 2024], Podgorica 2025

as in leading commercial television stations (*Vijesti*, *Nova M*, *E*, *Prva*), but only one has a woman serving as editor-in-chief, who is also the executive director (*Nova M*).<sup>81</sup>

None of the three top positions at RTCG are held by women (Director General, Director of Television, and Director of Radio).

It is a general view among interviewees and female journalists who participated in focus groups that the most vulnerable category consists of female journalists who live and work in smaller communities and those who cover “crime and police beat” topics. They are followed by younger female journalists, single mothers, and women in general, as they are perceived as “easier targets” than men and more easily discredited through misogynistic and sexist attacks and denigration based on gender stereotypes.<sup>82</sup> Traditional gender roles in private life are also prevalent, which further places female journalists at a significant disadvantage, as they are forced to balance “implicitly expected” household duties with professional responsibilities.

The only media outlet that in some way addresses the issue of gender equality is RTCG, through its “Gender Equality Plan 2023–2027,”<sup>83</sup> which outlines certain measures aimed at improving working conditions for women and presents statistical data showing, for example, that women make up the majority of employees, while only three out of the eleven employees in the Office of the Director General are women.

Over the past several years, the Office of the Ombudsman has recorded an increased number of cases of hate speech, misogynistic and sexist discourse directed at women in socio-political life, including journalists, politicians, and civil society activists.

“Among the above, it appears to us that gender stands out as a personal characteristic on the basis of which women journalists in recent years have frequently been targets of discriminatory comments and statements containing elements of hate speech, primarily sexist and misogynistic.”<sup>84</sup>

Two women journalists in Montenegro have been under constant police protection for four years due to threats to their safety, and during 2024 two additional journalists received police protection to a certain extent.

81 The data are provided based on a review of the imprint contents of the aforementioned media as of June 01, 2025

82 TUMM, “Bezbednost novinarki 2024”, [Safety of Women Journalists 2024], Podgorica 2025

83 RTCG, „[Plan rodne ravnopravnosti 2023-2027](#)”, [Gender Equality Plan 2023–2027], Decembar 2023.

84 Interview with Siniša Bjeković, conducted by Marijana Camović-Veličković, March 2025

## C. JOURNALISTS' SAFETY

### — C.1 JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES

The situation regarding the legal protection of journalists and other media workers did not change during the previous year. Within the police and the prosecution service, a special department dedicated exclusively to attacks against journalists and media property has still not been established; however, both institutions have designated contact points responsible for communication with the media and interested organizations in the event of an incident.<sup>85</sup> The number of attacks increased in 2024, including a physical assault in which *Pobjeda* journalist Ana Raicković sustained minor bodily injuries. This is also the most brutal attack on journalists in Montenegro recorded in the past six years. Special mechanisms for protecting journalists from hate speech or serious threats to life have still not been established. State institutions have not introduced specific or effective mechanisms for reporting cases of attacks, threats, or hate speech. Currently, victims of attacks and threats may file reports with the Police Directorate through the regular procedure applicable to all citizens. Hate speech is increasingly present in the public sphere, and given that it threatens to become an even more serious problem, it is necessary for the state to establish special protection mechanisms. A new development is the Instruction of the Supreme State Prosecutor's Office on acting in cases of attacks against journalists,<sup>86</sup> which, among other things, obliges lower-level prosecutor's offices to urgently intensify work on cases formed in connection with attacks against journalists and media property, and requires heads of state prosecutor's offices to issue written, binding instructions to acting state prosecutors in cases where preliminary inquiries or investigations are unjustifiably prolonged.

During 2024, 24 attacks and threats against journalists and media outlets were recorded in the database of the Media Trade Union of Montenegro (TUMM) on the website [www.safejournalists.net](http://www.safejournalists.net), while the Police Directorate registered 16 cases.<sup>87</sup> Once again, the situation from previous years was repeated, with TUMM recording more cases than those officially reported. In general, all minor cases from previous years are resolved within a short period of time; however, a trend of slowing down is again noticeable, as some cases have not received any outcome even after several years. Of the total number of cases registered by the police, the competent state prosecutor classified two cases as criminal offences prosecuted *ex officio*, one of which has been solved, while measures and actions are still being undertaken to clarify the other. In one incident, the competent state prosecutor assessed that the reported events did not contain elements

85 Data from the Trade Union of Media

86 Tužilaštvo.me, [Upustvo za postupanje državnih tužilaštava u slučajevima prijetnji i nasilja nad novinarima...](#) [Guidelines for the Conduct of State Prosecutors in Cases of Threats and Violence against Journalists...]

87 Letter from the Police Directorate, Feb 07, 2025

of a criminal offence prosecuted *ex officio*, nor elements of a misdemeanour. It was assessed that three cases constituted misdemeanours and proceedings were initiated, while in two cases the case files were submitted to the prosecutor's office for an assessment of the legal qualification of the events.

The experiences of journalists and media representatives who were victims of attacks and threats are largely positive with regard to the conduct of police officers responsible for the investigations. No cases were reported in which the relevant state authorities refused to accept a report of an incident.

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

Amendments to the Criminal Code have improved the preventive protection of journalists and other media workers in Montenegro with regard to threats to their safety. However, within newsrooms themselves there is no preventive approach, and risk assessments are not carried out before sending crews into the field, especially ahead of high-risk events. The current legal framework provides the possibility of continuous police protection in cases where there is a serious threat to the life or physical safety of journalists. A prerequisite for providing police protection is a negative security assessment. For the past four years, two female journalists have had continuous police escort because they were previously victims of serious attacks and threats due to their investigations into high-level corruption and crime.<sup>88</sup> During the year, the police, in cooperation with the competent institutions, acted on a total of five requests from the Special Purpose Police Sector concerning individual assessments of threats to journalists' safety. During the year, due to threats received by letter, two female journalists were provided with a certain level of police protection.<sup>89</sup>

"My colleague and I, after one of the episodes of the series we are working on, which deals with issues of crime and corruption, was broadcast, received a threatening letter by post. We reported the case, and for the next six months the police, albeit informally, protected us by having officers monitor the places we moved through, our vehicles, our places of residence, and similar locations. Not many people knew about this because it was done discreetly, but it gave us a sense of security."<sup>90</sup>

The police have not established any specific risk-assessment procedures related to potentially endangered journalists; instead, such cases are handled individually through the standard procedure that applies to all citizens. However, it has been announced that work on Standard Operating Procedures is underway, which will define specific measures and actions each police officer should undertake in cases of

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88 Ibid

89 Focus group with women journalists, Feb 7, 2025

90 Ibid.

attacks on journalists.<sup>91</sup> This implies that journalists address the police with a request for a risk assessment, after which the police contact the National Security Agency. For several years, work has been ongoing on a guide or manual for risk assessment for employees in the media industry, but the public has not been informed about this working document or when it will be adopted. Amendments to the Criminal Code, which entered into force at the beginning of 2022, enable preventive protection for media workers in Montenegro. Specifically, the amended Criminal Code provides additional protection through five amended criminal offences that prescribe stricter penalties for perpetrators of attacks on journalists. Several cases have already been qualified under these new provisions of the Criminal Code. Risk assessments for journalists are still not carried out within their newsrooms, particularly when sending crews to high-risk events.<sup>92</sup>

Special support services for media workers exposed to attacks and threats are mainly provided by civil society organizations, and media employees highlight these as the most necessary services. The Trade Union of Media also offers free legal and psychological assistance, and during 2024 more than 160 individual therapy sessions were provided for this purpose. For female journalists under police protection, this status does not provide any additional “privileges” in terms of psychological or other forms of support, but only physical protection by police officers assigned as escorts. They may also use support services provided by the civil sector.

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

Montenegro is one of the first countries (among the first five) to have signed and ratified the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the Istanbul Convention), which entered into force on 1 August 2014. An important strategic document is the National Plan for the Implementation of the Istanbul Convention for the period 2023–2027,<sup>93</sup> on the basis of which the adoption of new laws has begun, including amendments to the Criminal Code, the Criminal Procedure Code, and the Law on Free Legal Aid.

During 2024, no cases related to sexual harassment or threats of rape were recorded, while those that occurred the previous year, including the case of rape threats involving five female journalists, have still not been resolved. Female journalists testify to a different treatment by employers compared to their male colleagues, both in terms of salaries and general attitudes, while motherhood is highlighted as an additional challenge.

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91 TUMM's data

92 Focus group with editors, Mar 28, 2025

93 Government of Montenegro, [Nacionalni plan za implementaciju Istanbulske konvencije za period 2023.-2027. godine](#), [National Plan for the Implementation of the Istanbul Convention for the period 2023–2027]

Female journalists can rely on protection measures available to other women, such as free legal aid or protection from discrimination and gender-based violence, but there are no measures specifically linked to the profession.<sup>94</sup> The Law on Free Legal Aid<sup>95</sup> has been amended to define that the right to free legal aid may be exercised by victims of the criminal offence of domestic violence or violence within the family community, as well as victims of human trafficking, regardless of whether they are women or men.

Victims of gender-based violence still do not have the opportunity to receive information or assistance related to their problems in a systematic manner through networking among state institutions. A positive example, both for the general population and for female journalists, is the institution of the Ombudsman, which acts preventively (by providing information) and also provides statistical data and keeps records of such cases. "It seems to us that gender stands out as a personal characteristic on the basis of which female journalists in recent years have often been targets of discriminatory comments and statements containing elements of hate speech, primarily sexist and misogynistic."<sup>96</sup> In addition to the courts, female journalists who are victims of workplace discrimination can also turn to the Ombudsman institution. Such cases did not reach the public during 2024.

The Supreme State Prosecutor's Office is also aware of issues that concern female journalists specifically and emphasizes that "in addition to the general threats faced by journalists, female journalists are often targets of threats with sexual connotations, harassment, and gender-based disparagement, which further endangers their safety."<sup>97</sup>

"Female journalists are often victims of verbal threats and attacks, particularly online and on social media. These risks are often heightened if female journalists are active in reporting on sensitive topics such as corruption, political affairs, or organized crime. There is, namely, a gender dimension to the risks journalists are exposed to, and this risk differs by gender in various ways, depending on the environment."<sup>98</sup>

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

There are still no real improvements when it comes to the attitude of political party representatives or public officials toward the media. Moreover, in recent years, a noticeable trend has emerged of criticizing media outlets or journalists due to disagreements with the editorial policies of the outlets they work for. Thus, in 2023, while serving under a caretaker mandate, the then Prime Minister, on two occasions, made inappropriate

94 Protector of Human Rights and Freedoms of Montenegro – Ombudsman, [Izveštaji o radu](#) [Activity Report]  
95 Government of Montenegro, „[Besplatna pravna pomoc](#)“, [Free Legal Aid], Julz 20, 2025  
96 Interview with Siniša Bjeković, conducted by Marijana Camović-Veličković, March 2025  
97 Interview with Maja Janković, conducted by Marijana Camović-Veličković, March 2025  
98 Ibid.

remarks and verbally attacked a local media outlet; a senior politician engaged in similar conduct<sup>99</sup>. When the attackers do not come from political circles, public condemnation of attacks and threats against journalists and the media has become an established practice; however, such condemnations are mostly declarative and occur only after more serious incidents<sup>100</sup>.

Statements condemning attacks on journalists and media by public officials, politicians, and representatives are regularly issued, highlighting the need to ensure a safe working environment for media professionals. There is also frequent debate about which media outlets are professional and which are not, as well as whether attacks are directed at media from one or the other side of the polarized media community.

Taking into account that attacks often come from the highest political positions, such as the position of Deputy Prime Minister and ministers, it cannot be said that an environment has been created in which journalists can feel safe while doing their work. The practice of favoring politically aligned options and establishing informal partnerships with media outlets is still present.

## — C.5 POLICE AUTHORITIES ARE SENSITIVE TO JOURNALISTS' PROTECTION ISSUES

The trend of faster resolution of new cases of attacks on journalists has continued, so every incident that occurred during 2024 received some form of outcome. According to reports from the Police Administration and the Ministry of Internal Affairs, training is conducted annually for officials of these state bodies in order to further sensitize them and familiarize them with basic human rights standards, as well as with the nature and importance of the journalistic profession for every democratic society.

The year 2024 was also marked by frequent changes of directors of the Police Administration, and a certain stability was achieved only at the end of the year<sup>101</sup>. Because of this, the public is not aware whether during that period attention was devoted to protocols or guidelines for police officers, which prescribe the prohibition of harassment, intimidation, and physical attacks on journalists. The activities of the Council of Europe in Montenegro aimed at improving the education of police officers in this area also continued.

Previously, a more positive attitude toward cases of attacks on journalists was emphasized, in the sense that they were resolved more quickly than they used to be resolved in the past. However, there has been some stagnation, since for several years in certain cases concerning online threats, there has been no progress either from the prosecution or the police, and the threats have been

99 Safejournalists.net, [Incidents Database](#)

100 Focus group with journalists I, Feb 1, 2025

101 Rtcg.me, "[Lazar Šćepanović v.d. direktora Uprave policije](#)" [Lazar Scepanovic, Acting Director of the Police Administration]

repeated. In addition, a large number of older cases remain unresolved and are at risk of becoming time-barred.

“Institutions are responding better than before, but it is still not a system that would guarantee journalists effective protection. The Commission has long recommended that the Police Administration initiate regular reviews of the security of the most endangered journalists and media in cooperation with other competent state bodies. It is also recommended that the responsibility of prosecutors and police officers be reviewed in cases where shortcomings have been identified.” <sup>102</sup>

Cooperation between the Police Administration and organizations dealing with the safety of journalists still boils down to providing data at the request of organizations<sup>103</sup>. It is expected that through the adoption of Standard Operating Procedures, contact persons will be designated within the police who will be responsible for communicating with organizations and providing them with information on cases of attacks on journalists.

#### — C.6 SPECIALISED UNITS/OFFICERS ARE EQUIPPED WITH EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

The Commission for Investigating Cases of Attacks on Journalists remains the only body established by the Government and authorized to control investigations. During the year, the Commission issued several reports pointing out shortcomings of the prosecution and the police. The prosecution appointed prosecutors who serve as contact points for the media and civil society organizations in matters related to attacks on journalists.

“The Commission is involved in plans to establish a mechanism that entails monitoring the course of proceedings from the moment of an attack on a journalist, without the need for the journalist to personally report the attack or threat. In all police units and prosecutor’s offices, there are contact persons who communicate with the mechanism. The goal is to ensure better coordination, efficiency, and that the entire process is conducted within a single system, in which all relevant institutions/organizations have their representative and allocate financial resources for their work.” <sup>104</sup>

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

The most serious cases of attacks on journalists remain unresolved, with no progress in investigations that are allegedly still ongoing. Six years after the shooting of journalist Olivera

102 Interview, Predrag Nikolic, interviewed by Marijana Camovic-Velickovic, April 2025

103 Interview, Radomir Krackovic, interviewed by Marijana Camovic-Velickovic, March 2025

104 Interview, Predrag Nikolic, interviewed by Marijana Camovic-Velickovic, April 2025

Lakic, the trial of the suspects has begun, but the process has not advanced as hearings are constantly postponed<sup>105</sup>.

"After more than six years of investigation, the indictment was confirmed on July 31, 2024, and the first hearing was scheduled for Dec 9, 2024. To this day, hearings have been postponed for various reasons, none of which are the responsibility of the injured party. We hope the case will be tried within a reasonable timeframe, bearing in mind the absolute statute of limitations for the shooting (serious bodily injury, May 8, 2028)."<sup>106</sup>

Lawyer Dalibor Tomovic believes that the main stumbling blocks are mostly old investigations, for which there is still no will to identify the instigators and perpetrators of the attacks. However, compared to investigations in the last three years, there has been significant progress in the work of the authorities conducting them.

Amendments to the Criminal Code from 2022 allow attacks on journalists to be classified as more serious criminal offenses, for which stricter penalties are prescribed.

The only case of the murder of a journalist, which occurred 19 years ago, remains unresolved, and during the coming year, the only person convicted of complicity in that murder will serve out his sentence.

"In 2024, the Commission prepared a supplement to the report regarding the murder of Dusko Jovanovic, editor-in-chief of the newspaper Dan, which, inter alia, proposed that the Government initiate a Pledge and publicly announce a monetary reward or another form of incentive/reward for any person(s) providing useful information that could help or lead to clarifying this criminal offence."<sup>107</sup>

Institutions are responding better than before, but it is still not a system that guarantees journalists effective protection. The media community also criticizes the fact that many threats occurring online remain unresolved "because the police and prosecution cannot identify the perpetrators."<sup>108</sup>

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

The Criminal Code does not recognize online harassment as a specific criminal offense, even though, at least in the case of journalists, it occurs every year. However, some legal experts believe that this area is sufficiently regulated by the existing Criminal Code and that it is possible to

105 [Vijesti.me, „Počelo suđenje za ubistvo Kruščića i ranjavanje Olivera Lakić: Pročitana optužnica okrivljeni odbranu iznose 12. juna“](#) [The trial for the murder of Kruscic and the wounding of Olivera Lakic has begun: the indictment was read, and the defendants will present their defense on June 12], June 10, 2025

106 Interview, Dalibor Tomovic, interviewed by Marijana Camovic-Velickovic, April 2025

107 Interview, Predrag Nikolic, interviewed by Marijana Camovic-Velickovic, April 2025

108 Interview, Radomir Krackovic, interviewed by Marijana Camovic-Velickovic, February 2025

sanction such acts effectively regardless of the channels through which they occur (online or offline)<sup>109</sup>.

A slight increase in the number of online harassment cases against media workers has been recorded, from 7 such cases in 2023 to 9 in 2024, one of which was an implicit death threat. Other cases involved attempts by officials to discredit journalists, as well as threats and insults via email and social networks.

For some cases, the state prosecution assessed that they did not contain elements of a criminal offense, while others were prosecuted, and some are still under police and prosecutorial review. No special measures have been implemented to protect journalists in the online sphere; instead, cases are handled in the same way as when other citizens are affected.

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

Formally, victims of attacks and threats have access to the investigative process and are generally informed about the investigation, evidence, and case files. "I believe that in 2024, we have timely action by state authorities and prosecution of cases before the court." Victims were previously treated rather passively by investigative bodies, but now Tomovic points out that, given the provisions of the Criminal Procedure Code and the binding instruction of the Supreme State Prosecutor's Office, victims can obtain all necessary and permitted information.

The public relations departments of Montenegrin courts generally provide information on all cases that have been finally concluded or in which a verdict has been delivered. Information on the course of proceedings can also be obtained for cases deemed significant to the public. There is also the possibility of obtaining final court judgments through the courts' websites, although this is often not possible due to the anonymization of parties in proceedings and because judgments are not published in a timely manner.

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

The collection and publication of statistical data is one of the biggest problems of Montenegrin state institutions, especially when it comes to data concerning the media sector. There is not only an absence of stratified data, but such data are not collected at all. Even in situations where a state body does collect statistical data, they are not published proactively but can only be obtained upon request.

109 Interview, Mirko Boskovic, interviewed by Marijana Camovic-Velickovic, May 2025

When it comes to the safety of journalists, cases of attacks and threats are recorded by the Police Administration, and such data can be obtained upon request. However, their records include all attacks and threats in which the victim happens to be engaged in journalism, even when the specific case has nothing to do with their professional work, so even in that sense a clear picture is not obtained. Data can also be requested from the prosecution.

Institutions that do collect some data, such as the Statistical Office, do not provide an accurate picture, since when their data on the number of employees in the media are compared with data from the Tax Administration, a discrepancy of several hundred employees is evident, making them unreliable. Division within the sector in terms of gender, certain types of affiliation, and similar categories is not known precisely because of the absence of a basic database.

### — C.11 NON-PHYSICAL THREATS AND HARASSMENT

In 2024, 11 cases of threats were recorded.

This result is worse compared to 2023, when 6 such threats were registered, while in 2022, there were 13. In terms of seriousness, the threats were mostly of the same gravity, relating to endangerment of safety and insults. Out of the 11 recorded cases, in 4 the prosecutors ordered the filing of criminal charges for endangering safety, and in one case, a misdemeanor procedure was initiated against the perpetrator. Additionally, 4 cases were registered in which holders of public office were the initiators of threats. In December, an incident was recorded in the Parliament of Montenegro, when MPs and parliamentary staff prevented photojournalists and cameramen from documenting the incident. Additionally, the President of Montenegro, Jakov Milatovic, harshly addressed a journalist of *Radio Television of Montenegro* at a press conference, criticizing the editorial policy of the media she represented. His remarks were publicly condemned and may have instilled fear in the journalist. Furthermore, the President of the Municipality of Niksic and Member of Parliament, Marko Kovacevic, filed a criminal complaint against a group of journalists, alleging endangerment of safety through published articles. Deputy Prime Minister Nik Deljosaj, during the year, targeted a *TV Vijesti* journalist on social media, calling him a “pseudo-journalist” who would “be held for his misdeeds,” for which the journalist filed a lawsuit against him.

Category	Number	Brief description of cases
<p><b>Non-physical threats and harassment:</b></p> <ul style="list-style-type: none"> <li>– Surveillance or monitoring</li> <li>– harassment by phone calls</li> <li>– arbitrary harassment by representatives of judicial or administrative authorities</li> <li>– Aggressive statements by public officials</li> <li>– other forms of pressure that can jeopardize the safety of journalists in the performance of their work.</li> </ul> <p>These types of threats do not include mobbing and bullying in the work environment.</p>	11	<ul style="list-style-type: none"> <li>– A group of ruling party MPs, led by Dejan Durovic, head of the parliamentary club of Mandic's <i>New Serb Democracy</i>, attempted to prevent media representatives from reporting on the incident that occurred on December 23 in the Parliament of Montenegro by placing their hands in front of cameras, and one journalist had his phone taken away, which was later returned after a discussion.</li> <li>– Journalist and editor of <i>M Portal</i>, Danica Nikolic, reported to the police that on November 26 she received a threatening letter sent from Belgrade. A criminal complaint was filed against an unidentified perpetrator for the criminal offense of endangering safety.</li> <li>– Journalist of <i>RTV Gradska</i>, S.K, filed a complaint on November 12 due to a verbal attack against her via a communication platform. A misdemeanor complaint was filed against G.K. for an offense under Article 7, paragraph 2 of the Law on Public Order and Peace.</li> <li>– The President of Montenegro, Jakov Milatovic, addressed journalist Aleksandra Jovancevic of <i>Television of Montenegro (RTCG)</i> inappropriately and rudely after she asked a question he did not like. The incident occurred on September 24 during a press conference.</li> <li>– On August 15, journalist and author of a program broadcast on <i>TV Adria</i>, Mladen Stojovic, reported to the police that a person using the <i>Facebook</i> account "Becir Banjori Baja" had posted a threatening comment directed at him. The prosecutor at the Basic State Prosecutor's Office in Bar classified the case as the criminal offense of endangering safety.</li> <li>– Editor of <i>Vijesti</i>, Vukasin Obradovic, reported to the Police Administration on April 6 threats made against him by an unknown person via the social network X. The prosecutor at the Basic State Prosecutor's Office in Podgorica classified the case as a criminal offense of endangering safety.</li> <li>– Journalist J.B. reported in April that an unknown person had been sending her inappropriate messages via <i>Instagram</i>. M.R. from Berane was identified, and a criminal complaint was filed against him on suspicion of committing the criminal offense of endangering safety.</li> <li>– The President of the Municipality of Niksic, Marko Kovacevic, filed a criminal complaint against Drasko Duranovic, the editor-in-chief of <i>Pobjeda</i>; Biljana Matijasevic and Srdan Kosovic, a journalist of <i>Vijesti</i> and director of digital development; and Balsa Knezevic, journalist of the <i>Portal Aktuelno</i>. The criminal complaint was also filed against several politicians, the owner of the <i>Portal Aktuelno</i>, and an NGO representative. In his complaints, Kovacevic identified 13 individuals as the instigators of threats he had received on social media, which endangered both his safety and that of his family.</li> <li>– Journalist of <i>TV Vijesti</i>, Danilo Ajkovic, was targeted by Deputy Prime Minister Nik Deljosaj, who attempted to discredit him and his work. Deljosaj posted a status on his <i>Facebook</i> account in which he referred to Ajkovic as a "pseudo-journalist" who, under someone's instructions, spreads falsehoods together with two other people.</li> <li>– Journalist and director of the local public broadcaster <i>Radio Tivat</i>, Tamara Vucinovic, was reported to the police by the director of an educational institution in that town because she refused to reveal the source of information related to the school. The police questioned Vucinovic, who defended herself by invoking the provisions of the Law on Media and the Code of Journalists, which guarantee the anonymity of information sources. Vucinovic stated that the police were very professional and did not ask her to disclose the source, but only to give a statement regarding the complaint.</li> <li>– Editor-in-chief of <i>Antena M</i> radio, Darko Sukovic, reported threats to the police on January 30, which were directed at the media outlet and at him personally via <i>Facebook</i>. After Sukovic additionally stated that he did not feel endangered, the acting prosecutor concluded that in this particular case, there were no elements of a criminal offense subject to prosecution <i>ex officio</i>.</li> </ul>

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

In this category, the same number of cases was recorded as in the previous year, 2023 – four in total. In three of the cases, the victims were female journalists. One case was not reported, while for the remaining three, there is no available information regarding prosecutorial actions.

Category	Number	Brief description of the cases
<p><b>Threats against the lives and physical safety of journalists</b></p> <p>This category may include:</p> <ul style="list-style-type: none"> <li>– references to the murder of the journalist, his friends, family, or sources.</li> <li>– references to the infliction of physical harm on journalists, the journalists' friends, family, or sources.</li> </ul> <p>These threats may be:</p> <ul style="list-style-type: none"> <li>– made directly or through third parties.</li> <li>– transmitted through electronic or face-to-face communication.</li> <li>– implicit as well as explicit.</li> </ul>	4	<ul style="list-style-type: none"> <li>– Several individuals threatened <i>Vijesti TV</i> cameraman Drago Matovic on October 17, while he was attempting to video record the third removal of the official seal and the continuation of works on a building whose construction is disputed in the Podgorica neighborhood of Zabjelo.</li> <li>– <i>Vijesti</i> journalist Jelena Jovanovic reported to the police on June 20 that M.K. had issued threats against her while she was covering a murder that occurred in Cetinje. M.K., the brother of one of the victims, demanded to be told whether Jelena Jovanovic was present, stating that she would be next because she had "drawn a target" on his brother. The journalist, given the statement, felt endangered. The prosecutor's decision in this case remains unspecified.</li> <li>– On May 31, <i>RTCG</i> journalist D.B. and her mother, T.S., were threatened and attacked by Podgorica resident Drago Bulatovic. The Basic State Prosecutor's Office (ODT) in Podgorica ordered Bulatovic to be detained for 72 hours on suspicion of committing the criminal offense of endangering safety. On July 18, the Basic State Prosecutor's Office filed an indictment proposal against Bulatovic.</li> <li>– On January 6, <i>RTCG</i> journalist Natasa Baranin was attacked in Podgorica. The incident occurred when Baranin, who was driving a car, used her horn to signal to people standing on the roadway to move aside. An unidentified man approached the car and, according to a report published by <i>Antena M</i>, directed a series of threats and insults at the journalist.</li> </ul>

## — C.13 ACTUAL ATTACKS

Unlike in 2023, when no actual attacks were recorded, four cases falling into this category were documented in 2024. The most serious attack occurred on November 10, when *Pobjeda* journalist Ana Raickovic was assaulted in Podgorica, first verbally and then physically, by businessman Zoran Becirovic, his son, and security guards Mladen Mijatovic and Ljubisa Dukic. The response of the competent authorities was effective: the attackers were arrested and placed in custody.

Category	Number	Brief description of the cases
<b>Actual attacks on journalists</b> Types of actual attacks may include actual physical or psychological harm, kidnapping, home/office invasion, seized equipment, arbitrary detention, failed assassination attempts, etc.	4	<ul style="list-style-type: none"> <li>– Pobjeda journalist Ana Raickovic was attacked in Podgorica in the evening of November 10 by businessman Zoran Becirovic, his son Luka, and security guards Mladen Mijatovic, who was an employee of the Ministry of Interior, and Ljubisa Dukic. The attackers were arrested and placed in custody. The act was classified as violent behavior.</li> <li>– On April 14, Vijesti correspondent from Bijelo Polje, Alisa Hajdarpasic, was attacked while performing her professional duties in Bijelo Polje. The journalist had been assigned to cover police activities in Orahovica, in front of the family home of Zoran Lazovic, a former intelligence sector official who was arrested that day on the order of the Special State Prosecutor's Office (SDT). Despite Hajdarpasic immediately identifying herself and showing her press credentials upon arrival, a group of people present at the scene began insulting, belittling, and shoving her in order to prevent her from carrying out her journalistic task.</li> <li>– Sanadin Voloder, journalist of the Sarajevo newspaper Stav, was attacked in Montenegro during a business trip. Voloder was in Cetinje working on a report for Stav and promoting his book. On his return from Cetinje, in the evening hours of February 16, L.B. forcibly entered his car, threatened him, insulted him, and physically assaulted him. He demanded that the journalist drive him to Danilovgrad, threatening to kill him if he reported the incident. After some time, L.B. forced the journalist to stop the car and get out, then drove off in an unknown direction. The investigation determined that the attack was not motivated by Voloder's journalistic work.</li> <li>– Minister of Justice Andrej Milovic seized the mobile phone of Libertas Press journalist Radmila Grbic. The incident occurred in the hallway of the Parliament of Montenegro on February 9. The minister took the phone from the journalist's hand and handed it to a security officer, who immediately returned it to her. The Police Administration filed a misdemeanor complaint against the minister.</li> </ul>

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

In this category, five incidents were documented, matching the number recorded in 2023. Criminal charges were filed in two cases; one case remains ongoing; in another, a complaint lodged by one media outlet against another was dismissed; and one case was not reported to the authorities.

Category	Number	Brief description of the cases
<p><b>Threats and attacks on the media and associations of journalists</b></p> <p>Actual attacks on the property of media outlets and organizations, their employees, confiscated equipment, aggressive statements by public officials, etc. In addition, threats and attacks can include some of the categories listed above.</p>	5	<ul style="list-style-type: none"> <li>- On November 21, the ETV Portal received an email containing offensive and threatening content, accusing employees of the ETV media group of being "criminals of the DPS gang" and warning them to be careful because it could be their "last winter" – adding that "a hundred of them" are nearby and waiting. The case was reported to the police, who on November 29 arrested T.M. (49) from Bar on suspicion of committing the criminal offense of endangering safety, which was also the prosecutor's qualification. Since he had no prior convictions, detention was not ordered, while the prosecutor mandated a psychiatric evaluation.</li> <li>- On September 16, employees of the Montenegrin Electricity Distribution System (CEDIS) verbally attacked and prevented the RTV Gradska team from working. One of the workers told the cameraman that he was a former police officer, had an official ID, and had trained in jiu-jitsu, which the RTV Gradska team perceived as a threat, and left the neighborhood.</li> <li>- On Thursday, March 14, the Vijesti TV crew was prevented from broadcasting live from the Toloska suma in Podgorica. A member of the security staff forbade the crew from doing a live segment for the morning program "Boje jutro", claiming that such access was allowed only to the private Television E.</li> <li>- Employees of Television E received several threatening comments on Facebook from two accounts at the beginning of the year. The cases were reported to the police. A criminal complaint was filed by the police against Tomislav Mikovic, suspected of being the user and creator of these accounts.</li> <li>- Portal Borba filed a complaint with the Basic State Prosecutor's Office (ODT) in Podgorica against Antena M, Darko Sukovic, and Miljan Vesovic. The reason for the complaint was an article published on the Antena M portal titled "How a Civil Conflict Begins in Montenegro" on February 6, 2024, which they claimed contained hate speech. The ODT confirmed to Borba that "a case has been opened and assigned to the acting prosecutor." The acting prosecutor at the ODT concluded that there were no grounds to initiate criminal proceedings.</li> </ul>



# Conclusions and recommendations

## — CONCLUSIONS

### LEGAL GUARANTEES AND THEIR IMPLEMENTATION

The professional conduct of all media is not assured, as oversight of the application of professional standards in online portals, by far the most numerous in Montenegro, accounting for more than half of all media outlets and steadily increasing in influence, remains unresolved. As a result, there is a noticeable increase in propaganda and biased reporting in favor of certain political options, while punishment for spreading hate speech and inciting discrimination remains tied to lengthy court proceedings, which, in the long run harms journalistic professionalism.

The independence of the *Public Broadcasting Service* remains questionable. In mid-2024, the Government and parliamentary majority adopted amendments to the law that directly benefit Boris Raonic, who had already been unlawfully elected twice as Director General, enabling him to be reappointed.

The financial stability of local public broadcasters, established by municipalities, has improved with the adoption of the new Law on Audiovisual Media Services. State advertising in private media remains insufficiently transparent, while state subsidies to private media through the Fund for Media Pluralism lack evaluation of how those funds are spent.

Although media freedom in Montenegro is guaranteed by the Constitution and laws, both old and new challenges persist in a dynamic media industry characterized by a large number of outlets in a small market with limited audience. Upholding professional standards remains a major challenge, as some politicians and officials tend to exert control over certain media. The struggle for full independence of the *Public Broadcasting Service* and local public broadcasters must be

continuous, as must the fight for better working conditions for journalists and media workers. New challenges such as the rise of disinformation, hate speech, and strengthening propaganda must be addressed effectively by the entire media community as well as the state. SLAPP lawsuits remain rare.

## — THE POSITION OF JOURNALISTS IN NEWSROOMS

While certain private media outlets and local public broadcasters had modest salary increases, average earnings across the media sector remain below the national level. Key challenges include the excessive workload faced by journalists in private media and the failure of some outlets to pay salary supplements. Despite renewed efforts by two media unions, there has been no progress in negotiations with media owners regarding the conclusion of a Branch Collective Agreement, which is intended to improve the position of all employees in the media sector. Some journalists also report censorship and self-censorship in certain outlets, with pressures most often coming from politicians, exercised through editors and directors. Similar cases have been documented within the *Public Broadcasting Service*, where political influence is evident in the dismissal of editors considered unsuitable. The position of women in the media is additionally challenging, as salary policies are not transparent. They often receive lower pay than male colleagues for the same work, even though it is estimated that women make up more than 60% of media employees. Women also encounter challenges in balancing professional and family obligations and are less often represented in senior roles such as directors and editors-in-chief, though some do occupy these positions in certain private television outlets and local public broadcasters.

## SAFETY OF JOURNALISTS

The number of attacks on journalists in 2024 has increased, but many of them have been resolved or are on the way to being resolved. On the other hand, older and most serious cases of attacks on journalists remain unsolved. There are still no special mechanisms to protect journalists from hate speech or serious threats to their lives, and no dedicated systems exist for reporting attacks or threats. Although amendments to the Criminal Code have improved preventive protection for journalists and increased penalties for attacks against them, prosecutorial and judicial practice still do not guarantee stricter sentences. Within newsrooms themselves, risk assessments are not carried out before sending teams into the field ahead of high-risk events. Politicians and public officials often criticize journalists and media whose work or editorial policies they disagree with, and frequently condemn attacks on journalists selectively. The position of women in this segment is vividly illustrated by the fact that two female journalists have been under police protection for years due to threats to their lives.

## GENERAL CONCLUSION

Despite certain improvements, such as rising salaries and a reduction in the most serious attacks on journalists, these changes are not felt in practice, as inflation

has annulled the increases, and the failure to resolve serious cases of attacks has maintained a general sense of insecurity among media employees.

The prevailing impression is that changes must be substantive and systemic, rather than superficial and politically driven. Laws should be adopted following consultations with all stakeholders, rather than through government or parliamentary majority amendments that alter key provisions immediately before adoption. Censorship and self-censorship remain major challenges for the profession, as does the lack of effective self-regulation.

In terms of safety, the competent authorities need to do more, specialize and intensify their efforts, in order to finally resolve older and most serious cases of attacks on journalists.

## — RECOMMENDATIONS

### DIMENSION A: LEGAL CERTAINTY

- Adopt amendments to the law aimed at sanctioning hate speech and incitement to discrimination in the media. (Parliament of Montenegro)
- Ensure the full independence of the *Public Broadcasting Service*, bring the procedure for appointing the Director General into lawful channels, and conclude the court proceedings against members of the RTCG Council. (Parliament of Montenegro, Supreme State Prosecutor's Office, Prosecutorial Council, High Court in Podgorica)
- Ensure the implementation of the newly adopted set of media laws, particularly regarding the appointment of council members in RTCG and AMU. (Parliament of Montenegro)
- Guarantee full transparency of state advertising and evaluate spending from the Fund for Media Pluralism. (Ministry of Culture and Media, Agency for Electronic Media)

### DIMENSION B: POSITION OF JOURNALISTS IN NEWSROOMS

- Continue efforts, through negotiations with employers, to adopt a Branch Collective Agreement that would improve the position of all journalists and media workers. (Trade Union of Media of Montenegro, Montenegrin Employers Federation)
- Identify cases of censorship and self-censorship in the media and ensure protection for journalists who speak out publicly about them. (Trade Union of Media of Montenegro)
- Secure better conditions for women in the media industry and full protection against gender-based discrimination. (Montenegrin Employers Federation, Protector of Human Rights and Freedoms of Montenegro, media)

## **DIMENSION C: JOURNALISTS' SAFETY**

- Make additional efforts to resolve the older and most serious cases of attacks on journalists. (Police Directorate, Supreme State Prosecutor's Office, Prosecutorial Council)
- Establish special mechanisms for reporting cases of attacks and threats against journalists, as well as mechanisms for protecting journalists from hate speech. (Police Directorate, Ministry of Justice)
- Media outlets should adopt or improve internal ethical guidelines, and also introduce risk assessment guidelines for reporting from high-risk events. (Media)

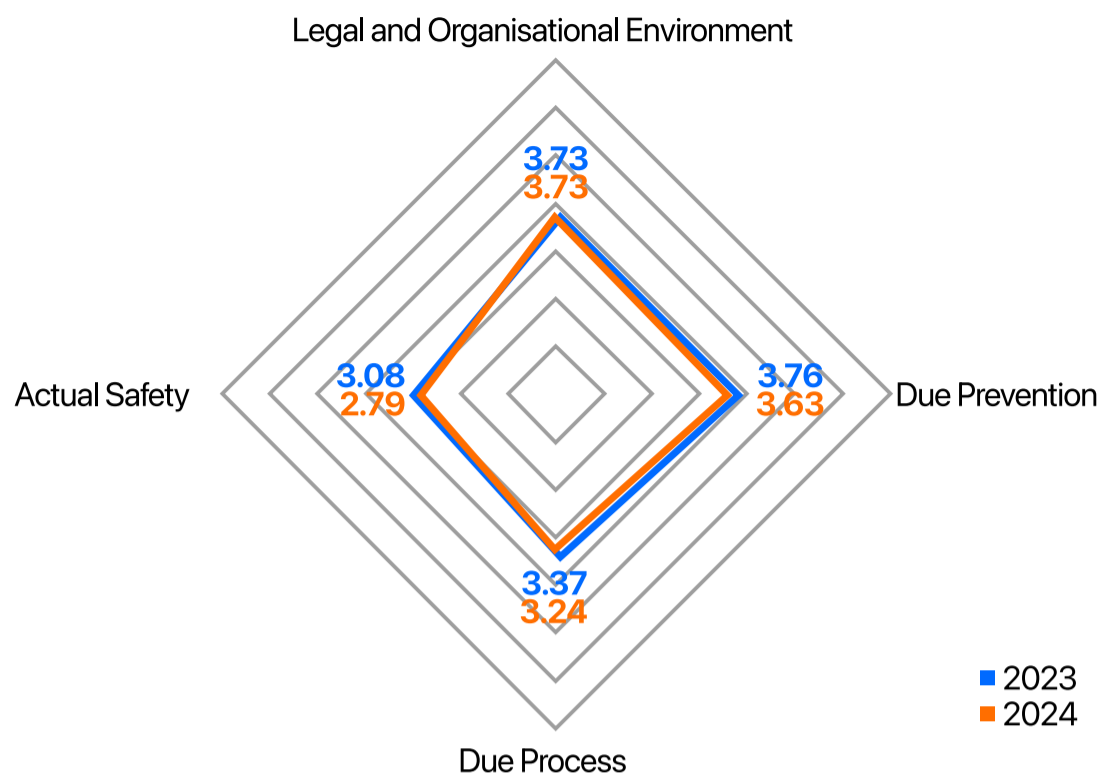
# IV

# Journalists' Safety Index in Montenegro – 2024

In this section of the Report, the Journalist Safety Index for 2024 is graphically presented in comparison with the previous year, 2023. For each of the four dimensions and all 19 indicators, a brief explanation of the key changes that occurred in 2024 is provided.

A more detailed explanation of the data and changes for each indicator of the Index can be found in the narrative part of the Report – Chapter II Media Freedom and Safety of Journalists in Montenegro – Indicators.

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



	2023	2024	Major new changes in each dimension
Legal and Organisational Environment	3.73	3.73	– Civil lawsuits for the protection of personality rights continue to be initiated, and their number has increased, with 31 such cases registered in which the defendants were media outlets and journalists, although defamation was decriminalized back in 2011. The Law on Media was amended in mid-2024, including changes to the provision on the protection of journalistic sources, which had been disputed. SLAPP lawsuits remain rare, but there have been instances where such proceedings were launched. A notable case involves the harassment and disparagement of journalist Dragana Scepanovic, against whom a local businessman has conducted a campaign for years through his portal, with the prosecution declaring itself not competent. Working conditions have not significantly changed, although salaries have increased in part of the media sector; however, wages remain below the national average. Only the <i>Public Broadcasting Service</i> has a collective agreement, but even that needs revision in the section concerning salaries. There are no collective agreements within the sector, nor is there social dialogue in the private media.
Due Prevention	3.76	3.63	↓ The situation regarding the legal protection of journalists and other media workers has not changed. The number of attacks has increased, and many cases recorded as online threats remain unresolved. Newsrooms do not prioritize preventive measures and rarely conduct risk assessments before dispatching teams to cover high-risk events, leaving individual editors to make ad-hoc decisions about which reporters are best suited for such assignments. Journalists at risk do not receive dedicated psychological or legal support from their newsrooms, relying instead on assistance from unions and journalist associations. Female journalists testify to unequal treatment by employers compared to male colleagues, both in terms of pay and general attitude. There is also a trend of criticizing journalists or media outlets due to disagreements with editorial policies.
Due Process	3.37	3.24	↓ The Commission for Investigating Attacks on Journalists remains the only body established by the Government with authority to control investigations. The trial of those accused of attempting to murder journalist Olivera Lakic in 2018 has begun, but is being obstructed. The only case of a journalist's murder, which occurred 20 years ago, remains unresolved. The most serious cases of attacks on journalists from the past have not been resolved, and there has been no progress in the investigations. Courts are generally open to the media, and parties in proceedings can obtain information directly or through lawyers. Final judgments are published in an anonymized form on court websites, but with a delay. Statistical data are not published except upon request, and not all institutions can provide accurate or consistent data that aligns with those of other institutions.

	2023	2024		Major new changes in each dimension
Actual Safety	3.08	2.79	↓	In 2024, 11 cases of threats were recorded, marking a deterioration compared to 2023, when 6 cases were registered. The threats were of comparable severity, primarily involving risks to personal safety and offensive remarks. Unlike 2023, when no actual attacks were registered, in 2024, four cases falling into that category were documented. The most serious attack occurred on November 10, when <i>Pobjeda</i> journalist Ana Raickovic was assaulted in Podgorica. In the category of threats and attacks against media outlets, five cases were recorded, the same as in 2023. Criminal charges were filed in two cases; one case remains ongoing; in another, a complaint lodged by one media outlet against another was dismissed; and one case was not reported to the authorities.
<b>Journalists' Safety Index</b>	<b>3.33</b>	<b>3.15</b>	<b>↓</b>	

# I.

## Legal and Organisational Environment

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

3.55

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

4.52

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

3.17

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

4.10

Journalists' job position is stable and protected at the workplace

3.34

1.00 Neither law nor practice provides any protection in the workplace for journalists, their sources, and their organizations, which creates an extremely chilling effect.

2.00

3.00

4.00

5.00

6.00

7.00

↑  
↓

Both the law and practice provide the highest degree of protection in the workplace for journalists, their sources, and organizations.

#### INDICATOR 1.1

### — LEGAL PROVISIONS RELATED TO DEFAMATION AND THEIR IMPLEMENTATION DO NOT PRODUCE CHILLING EFFECTS ON JOURNALISTS AND MEDIA

**Score for 2023: 3.55 / Score for 2024: 3.55**

There have been no changes regarding the protection of journalists in cases of lawsuits for defamation and insult. Defamation remains at the level of civil litigation, as it was decriminalized in 2011. The lawsuit filed by the brother of the President of Serbia, Andrej Vucic, against the daily newspaper *Vijesti*, in which he sought five thousand euros for the publication of a text about him, was perceived by the public as a SLAPP lawsuit. Mutual accusations among polarized media have continued. In 2024, 31 proceedings were initiated in basic courts in Montenegro against media outlets and journalists for violation of honor and reputation, representing an increase from 25 cases recorded the previous year. According to journalists, the fear of lawsuits for violation of honor and reputation does not significantly affect their work; they also state that the large number of lawsuits from earlier periods encourages them to exercise greater journalistic diligence when reporting.

#### INDICATOR 1.2

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

**Score for 2023: 4.29 / Score for 2024: 4.52**

In June 2024, the Law on Media was amended, with particular focus on the provision concerning source confidentiality, which had posed issues in the previous legislation. It is now stipulated that disclosure of sources may be requested only through judicial proceedings, and such a request must comply with European standards and be proportionally aligned with the protection of public health, national security, and territorial integrity, which represents progress compared to the earlier formulation. An additional safeguard is that the court may exclude the public from such proceedings.

#### INDICATOR 1.3

### — OTHER LAWS ARE IMPLEMENTED OBJECTIVELY AND ALLOW THE JOURNALIST AND OTHER MEDIA ACTORS TO WORK FREELY AND SAFELY

**Score for 2023: 3.17 / Score for 2024: 3.17**

Laws do not treat SLAPP lawsuits in any special way, and they remain rare. In a first-instance ruling, the court dismissed the SLAPP lawsuit filed by *Public Broadcasting Service* employee Vladana Vucinic against *Vijesti*, *Pobjeda*, a member of the Council of that state media, and one citizen. The defendants were sued for commenting on and publishing information related to her unlawful salary increase. There have been no documented instances of laws being misused to intimidate or silence journalists through burdensome and expensive court proceedings. The case of journalist Dragana Scepanovic from Kolasin is an example of harassment and obstruction in

performing her work, although she was not sued for it. During 2023 and 2024, Scepanovic was subjected to media pressure, as the *Portal Aktuelno*, owned by local businessmen she had written about, exerted pressure on her and disparaged her. She filed a lawsuit with the Basic Court in Podgorica after the prosecution took the position that there were no elements of a criminal offense subject to prosecution ex officio.

#### INDICATOR 1.4

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

**Score for 2023: 4.14 / Score for 2024: 4.10**

The definition of a journalist included in the new Law on Media is quite broad, but it does not require journalists to hold any license or registration. There have been no new initiatives for licensing journalists. The issue of accrediting journalists at certain events arises sporadically, but journalists emphasize that it is always resolved directly at the event through discussions with organizers. Freedom of association is undisputed, though it is rarely used effectively, and journalists report no problems stemming from membership in associations. There are three journalist associations, out of which only one is active. Two national trade unions also operate, with the Trade Union of Media of Montenegro being larger and more visible to the public. Its members continue to suffer pressures due to union membership, bans on organizing unions at the media-outlet level, and restrictions on union membership in general.

#### INDICATOR 1.5

### — JOURNALISTS' JOB POSITION IS STABLE AND PROTECTED IN THE WORKPLACE

**Score for 2023: 3.48 / Score for 2024: 3.34**

Despite the introduction of two minimum wage categories at the national level and salary increases for some employees, conditions in the media sector have largely remained unchanged, with average earnings still below the national level. Currently, most media employees receive the state minimum wage, amounting to 600 euros for secondary education and 800 euros for higher education. No branch or collective agreements have been signed at the media level, though amendments to the existing agreement in the *Public Broadcasting Service* have been announced, while the one in *RTV Budva* has expired. With the adoption of the Law on Audiovisual Media Services, the financial situation of local public broadcasters improved, as, thanks to the initiative of the Trade Union of Media, contributions of municipalities as founders of these outlets were aligned with municipal budgets. Nearly all local media have settled their debts to employees. During the year, more than 220 media outlets operated, while re-registration in line with the new Law on Media is still ongoing. Problems related to anti-union discrimination of activists in the media, as well as bans on union organizing in some private media, continue to be reported.



## Due Prevention



#### INDICATOR 2.1

### — JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES WHEN THEY ARE THREATENED

**Score for 2023: 3.55 / Score for 2024: 3.42**

The situation regarding the legal protection of journalists and other media workers did not change in the previous year. No dedicated department has been established within the police or prosecutor's office to handle attacks on journalists and media property. The number of attacks increased compared to the year before, with 24 attacks on journalists registered in 2024. Special mechanisms for protecting journalists from hate speech or serious threats to life have also not been established. State institutions have not introduced specific or effective mechanisms for reporting cases of attacks, threats, or hate speech. At present, victims of attacks and threats can only file complaints with the Police Administration through the regular procedure that applies to other citizens. Hate speech is increasingly present in the public sphere. A total of 24 attacks and threats against journalists and media outlets were recorded, while the Police Administration registered 16.

#### INDICATOR 2.2

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

**Score for 2023: 4.26 / Score for 2024: 4.07**

Newsrooms have not begun conducting preventive risk assessments before sending teams into the field, even ahead of high-risk events. However, some editors note that they take such precautions on their own initiative, assigning more experienced and male journalists. Current legal provisions allow for continuous police protection in cases where there is a serious threat to the life or physical safety of journalists, and in this way, two female journalists have been protected for several years, while two others were under certain forms of surveillance during 2024. The police have not established specific procedures for risk assessment concerning potentially endangered journalists; instead, such cases are handled individually through the standard procedure applied to all citizens. Special support services for media workers exposed to attacks and threats are mainly provided by civil society organizations, which employees in the media highlight as the most needed service. The Trade Union of Media also offers free legal and psychological assistance, and in 2024 more than 200 of its members asked for help in this regard.

#### INDICATOR 2.3

### — FEMALE JOURNALISTS HAVE ACCESS TO LEGAL MEASURES AND SUPPORT MECHANISMS WHEN FACED WITH GENDER-BASED THREATS, HARASSMENT, AND VIOLENCE

**Score for 2023: 3.89 / Score for 2024: 3.77**

Female journalists in Montenegro face the same situation as other women, lacking specific protections unless they are victims of domestic violence; in other words, they are not recognized anywhere within the system. They testify to a different treatment by employers compared to their male colleagues, both in terms of salaries and overall attitude. The Istanbul Convention was ratified at an early stage, yet its implementation requires greater specificity. The institution of the Ombudsman remains the only body that acts preventively (by providing information), while also supplying statistical data and keeping records of such cases.

#### INDICATOR 2.4

### — THE PRACTICE OF REGULAR PUBLIC CONDEMNATION OF THREATS AND ATTACKS ON JOURNALISTS AND MEDIA HAS BEEN ESTABLISHED

**Score for 2023: 3.19 / Score for 2024: 3.07**

A significant number of attacks and incidents have been caused by politicians and their intolerance of criticism. The most notable cases of attacks on journalists are generally condemned, such as the physical assault on *Pobjeda* journalist Ana Raickovic. The President of Montenegro, Jakov Milatovic, made an inappropriate comment and engaged in a verbal clash with a *Public Broadcasting Service* journalist over the functioning of *Radio and Television of Montenegro*, which was recorded as an incident. He later apologized to the journalist – the first time an official had done so. Ministers and mayors frequently provoke incidents, showing that journalists still lack a secure work environment. The practice of favoring politically aligned options and forming informal partnerships with media outlets remains present.

#### INDICATOR 2.5

### — POLICE AUTHORITIES ARE SENSITIVE TO JOURNALISTS' PROTECTION ISSUES

**Score for 2023: 3.89 / Score for 2024: 3.82**

The trend of faster resolution of new cases of attacks on journalists has continued, but online threats (via email and social media) remain a problem, as the prosecution and police often fail to clarify them even after several years. Reports from the Police Administration and the Ministry of Interior indicate that annual training is provided to officials of these institutions to strengthen their sensitivity and familiarize them with basic human rights standards. In recent years, a more positive approach to cases of attacks on journalists has been observed, in the sense that they are resolved more quickly than before. However, a large number of older cases remain unresolved and risk becoming time-barred.



## Due Process

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

3.63

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

3.02

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

3.11

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

3.36

Quality statistics collection systems established by state authorities to stem impunity

3.07

1.00

Institutions neither investigate nor sanction attacks on journalists, including online harassment, threats to the life and physical safety of journalists, and physical attacks on journalists and the media.

2.00

3.00

4.00

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5.00

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6.00

7.00

Institutions are fully efficient and transparent in investigating and sanctioning attacks on journalists, including via the internet, threats to the life and physical safety of journalists, and physical attacks on journalists and the media.

#### INDICATOR 3.1

### — SPECIALISED UNITS/OFFICERS ARE EQUIPPED WITH EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

**Score for 2023: 3.63 / Score for 2024: 3.63**

The Commission for Investigating Cases of Attacks on Journalists remains the only body established by the Government and authorized to control investigations. During the year, the Commission issued several reports pointing to shortcomings by the prosecution and police. The binding instructions for prosecutors leading investigations into attacks on journalists, issued by the Supreme State Prosecutor in April 2023, are still in force.

#### INDICATOR 3.2

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

**Score for 2023: 3.19 / Score for 2024: 3.02**

The most serious attacks on journalists still remain without a proper outcome. After eight years, the case involving the wounding of journalist Olivera Lakic finally reached trial proceedings, which commenced in December 2024. However, the case has made little progress due to constant delays and quiet obstruction by the numerous defendants involved, as several criminal offenses have been consolidated in this proceeding. If the process continues at this pace, the case risks becoming time-barred. The investigation into the murder of Dusko Jovanovic remains without concrete results, despite the announcement by the Supreme State Prosecutor that the case is once again in focus. In other serious cases of attacks on journalists, no progress has been made in investigative actions.

#### INDICATOR 3.3

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

**Score for 2023: 3.34 / Score for 2024: 3.11**

The Criminal Code of Montenegro does not explicitly regulate online threats; in 2024, eight such cases were documented, representing a slight increase from seven cases in the previous year. Representatives of various media outlets were targeted, but of particular concern is the fact that some journalists, both male and female, were repeatedly singled out online. In four cases, investigative authorities undertook concrete actions that led to the initiation of criminal or misdemeanor proceedings.

#### INDICATOR 3.4

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

**Score for 2023: 3.46 / Score for 2024: 3.36**

The transparency of court proceedings and the openness of courts toward the media and journalists did not change during the previous year. Courts are generally open to the media, and parties in proceedings can obtain information directly or through their lawyers. Final judgments are published in anonymized form on court websites, though with delays. Victims of attacks and threats have access to the investigative process and are generally informed about the proceedings, evidence, and case files. Public relations departments of Montenegrin courts typically provide information on all cases that have been finally concluded or in which a judgment has been delivered. Information on the course of proceedings can also be obtained for cases deemed significant to the public.

#### INDICATOR 3.5

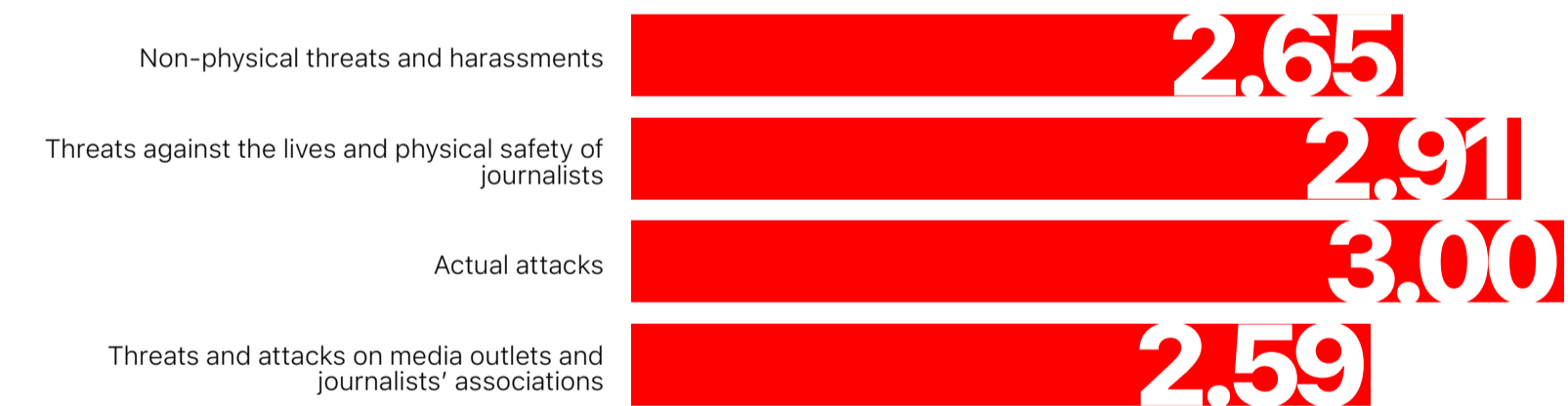
### — QUALITY STATISTICS COLLECTION SYSTEMS ESTABLISHED BY STATE AUTHORITIES TO STEM IMPUNITY

**Score for 2023: 3.24 / Score for 2024: 3.07**

Statistical data are generally not collected, and even in situations where a state body does collect them, they are not published proactively but can only be obtained upon request. Cases of attacks and threats are recorded by the Police Administration, and that data can also be obtained upon request. However, their records cover all attacks and threats involving victims engaged in journalism, even when the specific case is not related to their professional work, meaning that a clear picture is not obtained in that respect either. Data can also be requested from the prosecution. The Statistical Office fails to provide an accurate overview, as its data on media employment diverges by several hundred employees from those reported by the Tax Administration, thereby undermining their reliability. Division within the sector in terms of gender, certain affiliations, and similar categories is not known precisely due to the absence of a basic database.

# IV.

## Actual Safety



1.00 There are serious cases of threats and actual attacks against journalists and media organizations, including murders.  
2.00  
3.00  
4.00 ↑  
5.00 ↓  
6.00  
7.00 There were no cases of actual attacks, threats to the life and physical safety of journalists, or other threats and harassment of journalists and the media.

#### INDICATOR 4.1

##### — NON-PHYSICAL THREATS AND HARASSMENTS

This includes the following: surveillance or monitoring; harassing phone calls; arbitrary judicial or administrative harassment; aggressive statements by public officials; other forms of pressure that may threaten the safety of journalists in the performance of their work. These types of threats do not include mobbing and bullying in the workplace.

**Score for 2023: 2.89 / Score for 2024: 2.65**

In 2024, 11 cases of threats were recorded. This result is worse compared to 2023, when 6 such threats were registered, while in 2022, there were 13. In terms of severity, the threats were generally of the same level, involving endangerment of safety and insults. Out of the 11 recorded cases, prosecutors ordered the filing of criminal charges in 4 cases due to threats to safety, and in one case a misdemeanor proceeding was initiated against the perpetrator. Additionally, 4 cases were registered in which holders of public office were the initiators of the threats, which is particularly concerning.

#### INDICATOR 4.2

##### — THREATS AGAINST THE LIVES AND PHYSICAL SAFETY OF JOURNALISTS

They may include the following: calls for the murder of journalists, their family, friends, or sources; calls for physical harm to journalists, friends, family, or sources; These threats may be: made directly or through a third party; made via electronic communication, face to face; they may be both implicit and explicit.

**Score for 2023: 3.09 /Score for 2024: 2.91**

In this category, the number of cases remained unchanged from 2023, with four recorded in total. In three of the cases, the victims were female journalists. One case was not reported, while for the remaining three there is no available information regarding prosecutorial actions.

#### INDICATOR 4.3

##### — ACTUAL ATTACKS

This type of attack may involve actual physical or psychological harm, kidnapping, intrusion into a home or office, confiscation of equipment, arbitrary detention, attempted murders that did not succeed, and similar acts.

**Score for 2023: 3.34 /Score for 2024: 3.00**

Unlike in 2023, when no actual attacks were recorded, in 2024, four cases falling into this category were documented. The most serious attack occurred on November 10, when *Pobjeda* journalist Ana Raickovic was assaulted in Podgorica, first verbally and then physically. She was attacked by businessman Zoran Becirovic, his son Luka, and security guards Mladen

Mijatovic, who was an employee of the Ministry of Interior, and Ljubisa Dukic. The response of the competent authorities was effective: the attackers were arrested and placed in custody.

INDICATOR 4.4

— **THREATS AND ATTACKS ON MEDIA OUTLETS AND JOURNALISTS' ASSOCIATIONS**

Threats refer to the following: harassing calls; arbitrary judicial or administrative harassment; aggressive statements by government officials; other forms of threats (inscriptions, threatening posts, etc.). Actual attacks refer to the: breaking into offices, seizing equipment, destroying equipment, vehicles, etc.

**Score for 2023: 2.98 / Score for 2024: 2.59**

In this category, five incidents were recorded, the same number as in 2023. Criminal charges were filed in two cases; one case remains ongoing; in another, a complaint lodged by one media outlet against another was dismissed; and one case was not reported to the institutions.

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