



Assessment of Montenegro's
Progress in Meeting Political
Criteria in Negotiations with
the EU

Media in times of crisis: Problems piling up, solutions a long way off

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Introduction

The situation in the Montenegrin media landscape has been further aggravated by health crisis and political and religious turmoil. According to international experts, media freedoms in Montenegro have been showing a downward trend, the coronavirus pandemic has significantly affected the sustainability of the media and waves of disinformation have been surging one after the other.

Although the previous government adopted amendments to media laws, the area saw no improvement. Moreover, certain provisions of these laws openly violate the confidentiality of journalistic sources. The government formed after 30 August has already announced that media legislation requires further amendments.

The national broadcasting service has been drawing criticism from all quarters, and amendments to the laws governing its work have yet again failed to transform it into a professional service that caters for the needs of citizens instead of interests of political parties.

The financial crisis caused by the coronavirus pandemic has further aggravated the situation for the already underpaid journalists, and some media outlets made a U-turn in their editorial policies following recent changes in their ownership structure.

Only initial steps have been taken in anti-disinformation efforts, and Montenegrin citizens are still exposed to a multitude of untruths spread by social networks and the media, largely from the region-based tabloids that ply the Montenegrin media scene with fake news, which remains to be a major and unresolved issue.

The experts who participated in our research gave the situation in the media an average score of 2.2 on a 1-5 point scale.

No consensus even on media laws

Montenegro's media regulations and its amendments and implementation, as with many other laws, do not guarantee that journalists, media and the public will be facing fewer obstacles, nor do they guarantee genuine respect for journalistic standards and protection of journalists.

In 2020, after almost three years of drafting and harmonization, Montenegrin MPs adopted the amended Law on Media¹ which was met with mixed reactions, given how polarized the media scene is.

The provision that provoked the sharpest reactions from a part of the media community is the one stipulating that a journalist must disclose their source if it is deemed necessary for the protection of interests of national security, territorial integrity and health protection.

The original intention of the then-government was to also prescribe that journalists are legally obliged to disclose their sources in cases where criminal offenses punishable by imprisonment of five years or more have been made public, but a later amendment by the Government of Montenegro² deleted this provision.

1 The Law on Media, Official Gazette of Montenegro No 82/2020.

2 MINA, "Briše se osnov o otkrivanju izvora za krivična djela koja se kažnjavaju sa pet i više godina zatvora" *Vijesti online*, 27.07.2020. Available at: <https://www.vijesti.me/vijesti/drustvo/454719/amandman-vlade-na-zakon-o-meidjima-izvor-se-mora-otkriti-u-slucaju-nacionalne-bezbjednosti>. Accessed on: 31.05.2021.

Both national³ and international⁴ journalists associations criticized the Montenegrin government over its provisions on disclosure of sources, labeling them a serious violation of confidentiality of journalists' sources. On the other hand, lawmakers⁵ argued that source disclosure would be the exception to the rule and to be applied only when alternative source disclosure measures have been exhausted.

The new government announced⁶ amendments to the Law, adding they would cooperate with all media stakeholders towards a solution.

The area of online media and web portals remains problematic, although their registration no longer lies within the competence of the Agency for Electronic Media (AEM), as the new law shifts this responsibility to the newly formed Ministry of Public Administration, Digital Society and Media⁷.

There is still a number of unregistered media outlets operating in Montenegro that do not have an impressum and information about ownership structure featured on their website. This remains an open issue, although the new law provides for fines between 1,000 and 8,000 euros for web portals that do not publish an impressum as required by the law and do not provide direct and permanent access to data on legal and natural persons i.e. shareholders who directly or indirectly own more than 5% share in their particular outlet, data on affiliated persons in the sense of the Law on audiovisual media services and data on other media founders owning more than 5% share in the outlet's start-up capital. In addition, the law stipulates that the media that fail to report the ownership structure may not apply for funds from the Fund for Media Pluralism and Diversity, also set up by the new law.

The Parliament of Montenegro adopted the Law on the National Public Broadcaster Radio and Television of Montenegro⁸ whose provisions on election of RTCG Council members were contested by non-governmental organizations⁹ which demanded that additional amendments be introduced by the new parliamentary majority, formed after the elections that took place on August 30. Montenegro has thus far been taking an inert and selective approach to the media, thus leaving room for non-compliance with journalistic standards and laws and the spread of disinformation, given that the emergence and rise of the phenomenon of fake news remained unaddressed; it is up to the new government and the competent authorities to train both the media and citizens towards a more accurate reporting and media literacy.

With the new government set-up, the area of media is now within the remit of the Ministry of Public Administration, Digital Society and Media; it was previously under the authority of the Ministry of Culture.

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3 MINA, "DPNCG i Media centar: Podržati zaštitu novinarskih izvora" *Vijesti online*, 21.07.2020. Available at: <https://www.vijesti.me/vijesti/drustvo/453011/dpncg-i-media-centar-podrzati-zastitu-novinarskih-izvora>. Accessed on: 31.05.2021.

4 Aneta Durović, Lela Šćepanović, "Reporteri bez granica pozivaju Đukanovića da ne potpiše Zakon o medijima", *Radio Slobodna Evropa*, 28.07.2020. Available at: <https://www.slobodnaevropa.org/a/reporteri-bez-granica-pozivaju-%C4%91ukanovi%C4%87a-da-ne-potpisi%C5%A1e-zakon-o-medijima/30753698.html>. Accessed on: 31.05.2021.

5 Tina Popović, "Ministarstvo kulture: Otkrivanje izvora je izuzetak, a ne pravilo", *Vijesti online*, 01.08.2020. Available at: <https://www.vijesti.me/vijesti/drustvo/456565/ministarstvo-kulture-otkrivanje-izvora-je-izuzetak-a-ne-pravilo>. Accessed on: 31.05.2021.

6 MINA, "Abazović: Neophodno je mijenjati Zakon o medijima", *Vijesti online*, 23.01.2021. Available at: <https://www.vijesti.me/vijesti/drustvo/505845/abazovic-neophodno-je-mijenjati-zakon-o-medijima>. Accessed on: 31.05.2021.

7 The Law on Electronic Media, Official Gazette of Montenegro No 82/2020..

8 The Law on National Public Broadcaster Radio and Television of Montenegro, Official Gazette of MNE No 80/2020.

9 "Traže hitne izmjene Zakona o RTCG", *RTCG*, 28.01.2021. Available at: <http://www.rtcg.me/vijesti/drustvo/308226/traze-hitne-izmjene-zakona-o-rtcg.html>. Accessed on: 31.05.2021.

More vigorous and concrete efforts are needed to tackle disinformation

The Agency for Electronic Media (AEM) is still not managing to achieve independence, impartiality and non-discrimination in their operation. This authority still lacks mechanisms to ensure the implementation of measures, warnings and penalties imposed on broadcasters that violate the rules.

In the course of 2020, the Agency¹⁰ issued 110 warnings to broadcasters, of which 88 ex officio, while 22 were issued following complaints.

Although in early 2020, AEM limited the re-broadcasting of certain contents aired by Serbia-based televisions for three months¹¹, following criticisms dealt by the civil society, there has been no further progress in this field, so hate speech is regularly aired on regional TV outlets whose programs are also available to Montenegrin audiences.

The fight against disinformation still lacks an adequate and energetic response from state institutions. Nevertheless, a positive step forward is to be found in the drafting of the Media Strategy 2021-2025, as well as in that the Ministry held consultations with the media¹² in the drafting process and allowed non-governmental organizations members to join the working group¹³ tasked with drafting the strategy.

Although the civil sector¹⁴ has been previously pointing to weak reactions by the state in this area, no concrete progress has been made yet. Montenegro is still lacking a clear strategy for combating disinformation. Another positive step has been taken in this direction by announcing that the Media Directorate at the Ministry of Public Administration, Digital Society and Media will be tasked with the development of media literacy.

However, despite such positive steps, apart from generally condemning and calling the media out on publishing disinformation, the authorities are still lacking concrete activities in the fight against fake news that the media are very susceptible to.

Although the Law on Media envisages allocations from state budget for media-related projects through the Fund for Encouraging Media Pluralism and Di-

10 Izvještaj o radu Agencije za elektronske medije za 2020. godinu. Available at: <https://aemcg.org/wp-content/uploads/2021/04/Izvjestaj-o-radu-AEM-za-2020.-godinu-2.pdf>. Accessed on: 31.05.2021.

11 "Savjet ograničio reemitovanje pojedinih programskih sadržaja TV Happy i TV Pink M", Agencija za elektronske medije, 10.02.2020. Available at: <https://aemcg.org/obavjestenja/saem-donio-odluku-o-ogranicavanju-reemitovanja-pojedinih-programskih-sadrzaja-tv-happy-i-tv-pink-m/>. Accessed on: 31.05.2021.

12 B.H., "Sržentić: Udruženo do boljih modela i uslova za rad medija", *Vijesti online*, 02.04.2021. Available at: <https://www.vijesti.me/vijesti/drustvo/526457/srzentic-udruzimo-ruke-u-definisanju-boljih-modela-i-uslova-za-rad-medija>. Accessed on: 31.05.2021.

13 Lista predstavnika nevladinih organizacija predloženih u radnom tijelu za izradu Medijske strategije Vlade Crne Gore 2021-2025. Available at: <https://www.gov.me/clanak/lista-predstavnika-nevladinih-organizacija-predlozenih-u-radnom-tijelu-za-izradu-medijske-strategije-vlade-crne-gore-2021-2025>. Accessed on: 31.05.2021.

14 Dragan Koprivica, Milica Kovačević, Tijana Velimirović, *Mreža dezinformacija i neadekvatna reakcija države*, Centar za demokratsku tranziciju, 2020. Available at: <http://www.cdtmn.org/analize/mreza-dezinformacija-i-neadekvatna-reakcija-drzave/>. Accessed on: 31.05.2021.

versity, the promotion of media literacy is listed as the last item for which funds can be allocated from the said Fund¹⁵.

As for the national broadcaster, surveys indicate¹⁶, that 51 per cent of citizens have trust in their reporting.

Although the national broadcaster's acts prescribe independence and autonomy in the work of its journalists and editors, this is still not ensured in practice, as pointed out by the European Commission¹⁷ which stated that RTCG is still not a true public service.

Political parties' influence and political interference remain to be, for now, the unsolved problems of the Public Service, as stated in the report by the State Department¹⁸.

The Law on National Public Broadcaster guarantees the independence of journalists in their work, they may not be dismissed from their job and their job position in editorial office may not be changed due to an opinion or position expressed in accordance with professional standards and program-related rules.¹⁹ However, according to the latest Reporters Without Borders report, "a balanced, professional attitude towards all quarters of society continues to be missing at the state-owned broadcaster RTCG, which the DPS party still controls, although it lost the latest parliamentary elections, rejoining the opposition for the first time after 30 years in government"²⁰.

Sustainability questionable, employees paying the price

The financial sustainability of the media in Montenegro remains unsatisfactory and has been further called into question by the crisis caused by the coronavirus pandemic. This directly affects journalists who remain underpaid, which, according to the State Department²¹, may lead to self-censorship. During the previous period, several media outlets changed owners²² which prompted a

15 MINA, "CDT: Osnovati fond za borbu protiv dezinformacija", *Vijesti online*, 18.11.2020. Available at: <https://www.vijesti.me/vijesti/drustvo/487421/cdt-osnovati-fond-za-borbu-protiv-dezinformacija>. Accessed on: 31.05.2021.

16 "Polovina građana Crne Gore nema povjerenje u medije", *CEDEM*, 10.02.2021. Available at: <https://www.cedem.me/en/activities/1246-objavljeni-rezultati-istrazivanja-o-medijima-i-medij-skim-slobodama>. Accessed on: 31.05.2021.

17 Biljana Matijašević, "Simuliranje reformi više ne prolazi: Opet šamari Brisela zbog pravosuđa", *Vijesti online*, 12.06.2020.godine. Available at: <https://www.vijesti.me/vijesti/politika/441697/simuliranje-reformi-vise-ne-prolazi-opet-samari-brisela-zbog-pravosudja>. Accessed on: 31.05.2021

18 Miloš Rudović, "Neriješeni napadi na novinare, miješanje u Javni servis, prljave kampanje tabloida, pritisak na nezavisne medije", *Vijesti online*, 30.03.2021. Available at: <https://www.vijesti.me/vijesti/drustvo/525665/nerijeseni-napadi-na-novinare-mijesanje-u-javni-servis-prljave-kampanje-tabloida-pritisak-na-nezavisne-medije>. Accessed on: 31.05.2021.

19 The Law on National Public Broadcaster of Radio and Television of Montenegro, Official Gazette of MNE No 80/2020.

20 Reporters without borders, "Dubious justice, problematic legislation". Dostupno na: <https://rsf.org/en/montenegro>. Accessed on: 31.05.2021.

21 Miloš Rudović, "Neriješeni napadi na novinare, miješanje u Javni servis, prljave kampanje tabloida, pritisak na nezavisne medije", *Vijesti online*, 30.03.2021. Available at: <https://www.vijesti.me/vijesti/drustvo/525665/nerijeseni-napadi-na-novinare-mijesanje-u-javni-servis-prljave-kampanje-tabloida-pritisak-na-nezavisne-medije>. Accessed on: 31.05.2021.

22 Duško Mihailović, "Vujić: U toku pregovori o još jednoj velikoj kupovini", *Pobjeda online*, 10.05.2021. Available at: <https://www.pobjeda.me/clanak/vujovic-u-toku-pregovori-o-jos-jednoj-velikoj-kupovini>. Accessed on: 31.05.2021.

complete change of course in their editorial policies and might in turn cause further financial turbulences and call into question the keeping of employees on payroll.

It is estimated that reporters' pay still falls behind national average, most often below 500 euros. They are continuously facing the problem of unpaid overtime and work on state holidays and weekends, and having to cover multiple roles all at once.²³

A survey conducted by the Media Trade Union of Montenegro indicates that as many as 15% of online media journalists witnessed pay cuts during the epidemic. Only a small number of journalists from all of the outlets were adequately paid for their work, through salary increases or top-ups, despite the fact that, according to the Media Trade Union, state aid amounting to 600,000 euros has been channeled to almost all of the Montenegrin media so as to alleviate the financial impact of the epidemic.²⁴

The majority of the many Montenegrin outlets are fighting for financial survival. With 750 employees, RTCG is the biggest media employer. On the other hand, RTCG earns only about EUR 500,000 in advertising revenue per year.²⁵

The Law on Media was adopted in July 2020. It stipulates that the Ministry of Public Administration, Digital Society and Media is to keep records of public funding of the media. The Ministry publishes on its website the annual report on the public sector's total allocations for advertising and other contractual services ending on June 1 of the current year for the preceding year.

The growing disregard for professional standards

Respect for journalistic standards, especially amid the pandemic and pre-election tensions, was at an extremely unsatisfactory level, and the phenomena of disinformation and fake news, as well as biased reporting, are reaching their peak.

The latest report by Reporters without Borders²⁶ has confirmed the downward trend in media freedoms. Montenegro is ranked 104th out of 180 countries covered by the report.

Prior to the coronavirus pandemic outbreak, the then newly launched topic of amendments to the Law on Freedom of Religion brought to light the widespread practice of violating professional standards in reporting on this topic and spreading of a myriad of manipulations by certain media. The majority of these "news" were coming from the media registered in Serbia, and media outlets from Russia and Bosnia and Herzegovina (Republic of Srpska) also had

23 Marijana Camović Veličković, Bojana Laković Konatar, *Indikatori nivoa medijskih sloboda i bezbjednosti novinara 2019.*, Sindikat medija, 2020. Available at: <https://sindikatmedija.me/publikacije/cijeli-izvjestaj-indikatori-za-nivo-slobode-medija-i-bezbjednosti-novinara-2019-crna-gora/>. Accessed on 31.05.2021.

24 GO SMCG, "Novinarska profesija obilježava 150 godina postojanja", *Sindikat medija*, 23.01.2021. Available at: <https://sindikatmedija.me/saopstenja/novinarska-profesija-obiljezava-150-godina-postojanja/>. Accessed on: 31.05.2021.

25 Media Sustainability Index, 2019. Available at: <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2019-montenegro.pdf>. Accessed on: 31.05.2021.

26 Reporters without borders, "Dubious justice, problematic legislation". Available at: <https://rsf.org/en/montenegro>. Accessed on: 31.05.2021.

their fair share. Of course, some of the Montenegrin media played their part as well. There were those who tried to support and promote these media manipulations as much as possible, but also those who tried to design their own “counter-campaign” through biased reporting.²⁷

Montenegro’s parliamentary elections held in August 2020, as well as local elections held in Niksic in March 2021, once again brought to light that the media are, for the most part, working hand in hand with certain political parties, thereby preventing citizens from receiving accurate and unbiased information. Both the parliamentary and the Niksic local elections brought along a substantial amount of disinformation and fake news to the Montenegrin public. These disinformation were for the most part spread by Serbia-based tabloids, but also by a significant part of the Montenegrin outlets that published information without prior fact-checking and often deliberately putting out information that stirred up political and inter-ethnic tensions. Local fact-checkers published analyses of dozens of fake news²⁸ which contained manipulative information and conspiracy theories about events before, during and after election days.²⁹ Biased reporting, i.e. publishing of information without presenting the other side of the story, was a common thing in the pre-election period, and it evidently caught on and continued even after the elections.

Verified fact checkers are engaged in fighting fake news in Montenegro. In order to finally engage the state in anti-disinformation efforts, and not by repression and selective detention of those who share fake news, but by means of a strategic approach i.e. by prevention and investment in media development, the Center for Democratic Transition proposed the setting up of a Fund for Combating Disinformation, which will support the sustainability of the media by helping them improve their reporting and promote journalism as a job done exclusively in the public interest.³⁰

Social networks are certainly an important channel for placing information, and the media often use them to publish untruths. While electronic media are required to register and regularly submit data on their ownership structure to the Agency for Electronic Media, online media are not obliged to do so, nor are any controls performed into them. We therefore witnessed brutal attacks and hate speech online, especially with the onset of the coronavirus pandemic.³¹

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27 Dragan Koprivica, Milica Kovačević, *Opasne medijske manipulacije*, Centar za demokratsku tranziciju, 2020. Available at: <https://docs.google.com/viewerng/viewer?url=http://cdtmn.org/wp-content/uploads/2020/05/Opasne-Medijske-Manipulacije-5.pdf&hl=en>. Accessed on: 31.05.2021.

28 Tijana Velimirović, *Izborni dan i širenje dezinformacija*, *Raskrinkavanje.me*, 03.09.2020. Available at: <https://www.raskrinkavanje.me/analiza/izborni-dan-i-sirenje-dezinformacija>. Accessed on: 31.05.2021.

29 “Mediji o izbornom danu u Nikšiću: Podizanje tenzija i širenje narativa”, *DFC*, 15.03.2021. Available at: <https://dfc.me/mediji-o-izbornom-danu-u-niksicu-podizanje-tenzija-i-sirenje-narativa/>. Accessed on: 31.05.2021.

30 “Država da pokrene borbu protiv dezinformacija”, *CDT*, 18.11.2020. Available at: <https://www.cdtmn.org/2020/11/18/drzava-da-pokrene-borbu-protiv-dezinformacija/>. Accessed on: 31.05.2021.

31 Dragan Koprivica, Milica Kovačević, Tijana Velimirović, *Mreža dezinformacija i neadekvatna reakcija države*, Centar za demokratsku tranziciju, 2020. Available at: <https://www.cdtmn.org/analize/mreza-dezinformacija-i-neadekvatna-reakcija-drzave/>. Accessed on: 31.05.2021.

Journalists under strain whenever tensions rise

The state is still taking a passive approach to attacks against journalists. Unsolved cases of attacks against journalists have been dragging on for years, despite constant pressure from the international community to have them resolved as soon as possible.

State authorities arrested journalists, claiming they had been causing panic among citizens by spreading fake news at the outset of the pandemic. The expert community in Montenegro criticized such actions by the state, citing as problematic that not all creators and spreaders of fake news were given the same treatment³² and calling attention to freedom of expression. The Media Trade Union also reacted sharply³³ stating that Montenegro does not have a good reputation when it comes to relations with the media and journalists. According to the European Commission's report, although progress has been made in terms of media legislation, this has been overshadowed by arrests and actions against editors of online web portals and citizens over contents they published or shared online in the course of 2020.³⁴

There were 16 instances of attacks against journalists and threats to their safety in Montenegro in 2020, including three arrests, two physical assaults and threats.³⁵ There has been a limited progress in resolving cases of violence against journalists and the media³⁶. The most high-profile cases of attacks against journalists remain unsolved for years, for as many as 17 years in certain cases³⁷. In the first half of 2021, there were several attacks against journalists, three of whom were attacked while on an assignment.³⁸ Journalists have been facing online attacks³⁹, as the Internet became the hotbed of hate speech and dangerous threats. Both domestic and international stakeholders decried the attacks, but it is important for the state to finally start prosecuting perpetrators...In condemning the attacks, the Safe Journalists Network, representing

32 Dragan Koprivica, Milica Kovačević, Tijana Velimirović, *Mreža dezinformacija i neadekvatna reakcija države 2020*, Available at: <https://www.cdtmn.org/analize/mreza-dezinformacija-i-neadekvatna-reakcija-drzave/>. Accessed on: 31.05.2021.

33 Marijana Camović, "SMCG pisao Stankoviću i Veljoviću: Prestanite sa hapšenjima novinara", *Sindikat medija*, 13.01.2021. Available at: <https://sindikatmedija.me/saopstenja/smcg-pisao-stankovicu-i-veljovicu-prestanite-sa-hapsenjima-novinaru/>. Accessed on: 31.05.2021.

34 "Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them" Directorate-general for external policies Policy department, 2021. Available at: [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO_STU\(2020\)653621_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO_STU(2020)653621_EN.pdf). Accessed on: 31.05.2021.

35 "Napadi na novinare učestali, vrijeme za strože kazne", *RTCG Portal*, 16.03.2021., Available at: <http://www.rtcg.me/vijesti/drustvo/313893/napadi-na-novinare-ucestali-vrijeme-za-stroze-kazne.html>. Accessed on: 31.05.2021.

36 Montenegro 2020 Report, *European Commission*, Available at: https://ec.europa.eu/neighbourhood-enlargement/sites/default/files/montenegro_report_2020.pdf. Accessed on: 31.05.2021.

37 "Danas 17 godina od ubistva Duška Jovanovića", *RTCG Portal*, 27.05.2021. Available at: <http://www.rtcg.me/vijesti/drustvo/322539/danas-17-godina-od-ubistva-duska-jovanovica.html>. Accessed on: 31.05.2021.

38 "SAD od Crne Gore traže više odgovornosti zbog napada na medije", *Radio Slobodna Evropa*, 03.05.2021. Available at: <https://www.slobodnaevropa.org/a/31235708.html>. Pristupljeno: 31.05.2021.

39 B.H., "Prijetnje Bursaću, Šukoviću i Anteni M: "Bombu ću vam tamo bačiti", *Vijesti online*, 26.05.2021. Available at: <https://www.vijesti.me/vijesti/drustvo/542303/prijetnje-smrcu-novinaru-draganu-bursacu>. Pristupljeno: 31.05.2021.

8200 media professionals in the Western Balkans, said it would inform relevant national and international stakeholders, as well as diplomatic missions in Montenegro, about the latest cases.⁴⁰

There are different motives behind the attacks. The main one lies in political polarization, which is conducive to attacks. The media trade union explains that some of these attacks are motivated by disagreement and open hatred towards media editorial policies or the journalists' coverage, which indicates a great lack of understanding of the role that the media and their employees play in a democratic society.⁴¹ The editorial policy of any media outlet cannot and must not serve as an excuse for insults, humiliation and attacks against journalists.⁴²

As many as 47% of citizens label the state as being inefficient in prosecuting and punishing those that threaten and attack journalists, while twice as many citizens believe that the state is more or less efficient in prosecuting and punishing those making threats against journalists.⁴³

In April 2021, the Government of Montenegro established a new Commission for monitoring the conduct of competent authorities in investigations of cases of threats and violence against journalists, murders of journalists and attacks on media property.⁴⁴

About the research

The research on the progress of Montenegro in meeting the political criteria for accession to the European Union (EU) is conducted with financial support from the Balkan Trust for Democracy (BTD) and the Royal Norwegian Embassy in Belgrade. A set of indicators is used to examine the quality of the strategic and legal framework, institutional and financial capacity, as well as the results achieved in seven areas: elections, judiciary, fight against corruption and organized crime, media, public administration reform and parliament. All the areas are elaborated in a topic per document model. Our analyses contain assessments of the fulfillment of the criteria that we have come up with by summarizing and articulating the views and evaluations of experts monitoring the quality of implementation of EU standards, as well as by analyzing the implemented normative and institutional reforms and their practical results. The third part of the research tackles the quality of work of the media. We have been evaluating this area as based on 44 indicators. We remain open to all suggestions, well-intentioned criticisms and discussions that may arise from our research. We are also ready to offer concrete solutions to all the issues we have labeled as problematic and thus contribute to reform process. We would like to express our appreciation to the Balkan Trust for Democracy and the Royal Norwegian Embassy for their trust and financial support.

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41 "Pet minuta gromoglasne tišine", *RTCG Portal*, 03.05.2021. Available at: <http://www.rtcg.me/vijesti/drustvo/319765/pet-minuta-gromoglasne-tisine.html>. Accessed on: 31.05.2021.

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