



NATIONAL DATA OVERVIEW:  
BOSNIA AND HERZEGOVINA

# SUSTAINABILITY OF PROFESSIONAL JOURNALISM IN THE MEDIA BUSINESS ENVIRONMENT OF THE WESTERN BALKANS

This report is based on the Study that has been carried out by a team of researchers including:

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*This research reflects the economic position and needs of independent media outlets in 2018 and 2019, with the majority of market data pertaining to 2018 and research being finalised in November 2019. The report does not cover the dramatic changes occurring in 2020, when the economic consequences of the COVID-19 pandemic dealt yet another blow to media businesses and further diminished the prospects for sustainability of independent media in the Western Balkans.*

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# Table of Contents

<b>1. MEDIA ECONOMY/BUSINESS ENVIRONMENT . . .</b>	<b>6</b>
1.1. MEDIA LANDSCAPE . . . . .	7
1.2. MEDIA OWNERSHIP . . . . .	7
1.3. MEDIA FUNDING . . . . .	9
1.3.1. ADVERTISING . . . . .	9
1.3.2. ROLE OF THE GOVERNMENT IN MEDIA FUNDING . . . . .	11
1.3.3. DONOR FUNDING . . . . .	13
1.3.4. NEW, ALTERNATIVE SOURCES OF MEDIA FUNDING . . . . .	15
1.4. CONSUMER BASE/AUDIENCES . . . . .	15
1.5. COMPETITION, DOMINANT POSITION AND ITS IMPLICATIONS . . . . .	16
1.6. MEDIA INDUSTRY ASSOCIATIONS . . . . .	20
<b>2. ECONOMIC SITUATION AND NEEDS OF INDEPENDENT MEDIA . . . . .</b>	<b>22</b>
2.1. WHO THEY ARE . . . . .	23
2.2. THE ECONOMIC SITUATION AND NEEDS OF THE SELECTED EXAMPLES OF INDEPENDENT MEDIA . . . . .	25
2.3. THE NEEDS OF THE SELECTED INDEPENDENT MEDIA AND NEW INITIATIVES . . . . .	28
2.4. OPPORTUNITIES FOR GROWTH (NEW APPROACHES) . . . . .	30

# Tables and Graphs

<b>TABLE BH 1.</b>	NUMBER OF MEDIA PER TYPE .....	<b>7</b>
<b>TABLE BH 2.</b>	OWNERSHIP OF MAJOR MEDIA PER TYPE ..	<b>8</b>
<b>TABLE BH 3.</b>	MAJOR MEDIA OWNERS IN THE COUNTRY AND THEIR MEDIA GROUPS .....	<b>9</b>
<b>TABLE BH 4.</b>	VALUE OF ADVERTISING MARKET SINCE 2008 (IN MILLION EURO).....	<b>10</b>
<b>TABLE BH 5.</b>	ADVERTISING SPENDING PER MEDIA TYPE, 2017 AND 2018 (IN MILLION EURO) .....	<b>10</b>
<b>TABLE BH 6.</b>	GOVERNMENT SUBSIDIES FOR MEDIA IN 2017 .....	<b>11</b>
<b>TABLE BH 7.</b>	EXAMPLES OF GOVERNMENT ADVERTISING (AND OTHER RELATED SERVICES) IN 2016 AND 2017 .....	<b>12</b>
<b>TABLE BH 8.</b>	DONOR FUNDING IN BIH: EXAMPLES OF ONGOING PROGRAMMES .....	<b>14</b>
<b>TABLE BH 9.</b>	AUDIENCE REACH BY MEDIA TYPE .....	<b>16</b>
<b>TABLE BH 10.</b>	MAIN HOLDERS OF SPORTS BROADCASTING RIGHTS .....	<b>19</b>
<b>TABLE BH 11.</b>	MEDIA INDUSTRY ASSOCIATIONS.....	<b>20</b>

<b>TABLE BH 12.</b> EXAMPLES OF INDEPENDENT MEDIA.....	<b>23</b>
<b>TABLE BH 13.</b> SELECTED NEW MEDIA INITIATIVES .....	<b>24</b>
<b>TABLE BH 14.</b> STRUCTURE OF REVENUES OF SOME INDEPENDENT MEDIA OUTLETS .....	<b>26</b>
<b>TABLE BH 15.</b> THE NEEDS OF INDEPENDENT MEDIA .....	<b>28</b>
<b>TABLE BH 16.</b> WEAKNESSES AND NEEDS CONCERNING INTERNATIONAL DONOR SUPPORT TO MEDIA .....	<b>29</b>
<b>TABLE BH 17.</b> AUDIENCE BEHAVIOUR AND RESPONSES BY THE MEDIA.....	<b>30</b>





# **1. MEDIA ECONOMY/ BUSINESS ENVIRONMENT**



## 1.1. Media landscape

The media landscape in Bosnia and Herzegovina is characterised by a large number of both private and public media outlets and by low marketing revenues, which moreover have fallen significantly over the past decade. In total, there are three public broadcasters, around 100 television stations, 146 radio stations, 8 news agencies and 8 dailies, and numerous online media outlets. Financial difficulties and political pressures have brought about the shutdown of a few important print media outlets and radio stations such as Slobodna Bosna, eFM student radio, and Radio 202, but the overall number of media outlets remains high. In addition to the traditional media, many online media outlets have been established, but their number is unknown since there are no official registries of online media nor is the sector regulated. Founding new media outlets in other media sectors has been a rare occurrence, but some examples in recent years include the TV news channel N1, a part of the United Group, which has positioned itself as a dominant player in the broadcasting sector; the private News Agency Patria; and finally RTV Herceg-Bosna, funded by municipalities and cantons with Croat majorities. The non-profit media sector remains underdeveloped, with only three non-profit radio stations. Many of the online platforms, however, function on a non-profit basis.

Independent media outlets are scarce. Many media outlets are affiliated with political parties that affect editorial policies through allocations of public funds and through influence on spending by major advertisers. Most of the independent media outlets are either funded by foreign donors or are part of larger commercial media that are able to generate sufficient marketing revenues.

**Table BH 1.** Number of media per type

Online	Radio	TV	Print	News agencies
More than 100	3 PSBs, 143 other	3 PSB, 38 terrestrial, 64 other networks	8 dailies, 181 periodicals	8

*Source: Registries of the Communications Regulatory Agency and Press Council, 2019.*

## 1.2. Media ownership

In Bosnia and Herzegovina there is no evidence that points to an excessive concentration of media ownership, and only in a few cases do two or three media organisations have the same owner. Concentration of media ownership is not, however, subject to regulation, which raises concerns regarding possible excessive concentration in future. In addition, there is a lack of transparency of media ownership, in particular in the online sector. Information on ownership can be gathered through registries of business entities and through registries of associations upon request and per a fee, and in part through online registries, but these are not proactive-



ly published by the Regulatory Agency for Communication, the Press Council or the media. Online media are the least transparent when it comes to disclosing information on their ownership and editorial staff; many are anonymous and are not registered as business entities. Media development organisations and media analysts have been advocating for regulations that would make media ownership more transparent and limit potential excessive concentration in the future.

The media landscape of BiH has not experienced major shifts in ownership. Most media are held by local actors and affiliated with local political parties which, through financing schemes, business and personal connections, have the power to meddle in the media’s editorial policies. This is particularly the case with numerous local public media outlets that are founded and financed by local governments and mainly controlled by the ruling political parties.

**Table BH 2. Ownership of major media per type**

Type	Radio	TV	Print	News agencies
Public	61	13 terrestrial networks 6 other networks	-	2
Private	79	25 terrestrial networks 58 other networks	8 dailies, 181 periodicals	6
Community	3	-	-	-

The leading television stations are in either private or public ownership, while the main print and online media are all owned by private persons. The main media owners are still the Kopanja, Selimović, and Radončić families. They dominate the print and online sectors, although the Selimović family also became the owner of one television broadcaster in 2018. Political affiliations are the most straightforward in the reporting of the daily newspaper Dnevni avaz, which is held by the Radončić family and is connected to the SBB party. The ownership of ATV, based in Republika Srpska, has been transferred to companies owned by two businessmen who are close to the ruling SNSD party, which in this way has strengthened its grip over the media in this part of the country.

On the other hand, a significant share of international investors in media in Bosnia and Herzegovina and owners of international media branches in the country are connected to governments of other countries. Such examples include Al Jazeera Balkans (indirectly owned by the Government of Qatar) and Anadolu news agency (a subsidiary of the state-run news agency of Turkey), but also the local offices of US government-funded Radio Free Europe and Voice of America, and German Deutsche Welle. A typical example of a predominantly corporate model of media ownership connected to regional and global investors are the operations of the United Group subsidiaries in Bosnia and Herzegovina. This large media group with cross ownership in broadcasting and telecommunications (including TV channels, TV distribution and internet provider services) and advertising across the Western Balkans has provided access to quality news programmes (e.g., N1 TV) and premium sports programmes (e.g., Sport Klub channels) to citizens of Bosnia and Herzegovina, but at the same time its cross-ownership and strong market position imply immense risks in terms of protection of competition and sustainability of domestic media.



**Table BH 3.** Major media owners in the country and their media groups

Owner	Media outlets	Companies (co)owned, in media-related sectors	Companies in non-media sectors
United Group	Nova BH; N1 TV (with offices in BiH, Serbia and Croatia) More than 30 channels in the region and beyond, including Nova channels in Croatia, Montenegro and Serbia; Sport Klub channels etc.	Direct media – advertising agency (operating in Serbia, Montenegro, with affiliates in BiH, Croatia and Slovenia), and Cas media (operating in Albania, Macedonia, Serbia and BiH) Telecommunication companies SBB (Serbia), Telemach (BiH), Telemach (Montenegro).	
Radončić Family	Dnevni avaz, print and online edition; Azra weekly; Alfa TV		Avaz Ltd. Real estate, hospitality and commerce
Kopanja Family	Nezavisne novine and Glas Srpske, print and online editions		Glas Srpski – Trade
Selimović Family	Daily Oslobođenje, Weekly BH Dani, TV1 (television acquired in 2018)		Naprijed Invest Ltd. – asset management; Consulting & PR Ltd. Consulting Bimacon – PR and business consulting; recently they sold a part of their holdings in other companies such as Klas, Sarajevska Pivara and Unioninvest plastika.

Sources: United Group website, Registry of Business Entities.

## 1.3. Media funding

The lack of opportunities for transparent and legitimate advertising and government funding are some of the most problematic factors limiting independent journalism.

### 1.3.1. Advertising

Advertising revenues are low and have, moreover, been constantly falling in the last ten years. This has had a major negative influence on the media sector in BiH. The value of advertising has been estimated to have shrunk to around 61 percent of its value from 10 years ago. IPSOS data suggest that the advertising market was worth around €38 million in both 2017 and 2018, pointing to a possible move towards stabilisation of the market. By contrast, the Fabrika Agency in Sarajevo put the value of advertising in 2017 lower, at €33.3 million.



A major concern is the outflow of advertising revenues to global communication platforms and to TV channels from the region that are distributed in BiH. The growing presence of United Group – which has established a strong position in media and telecommunications, as well as in the advertising business – adds to the financial deprivation of domestic independent media outlets which have limited ability to compete for advertising revenues with such a strong player. The local players also warn that such cross-ownership should be examined and limited because of the risks of concentration and abuse of market position.

**Table BH 4. Value of advertising market since 2008 (in million euro)**

2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
54.5	43.6	40.9	43.6	43.2	42.6	43.5	44.3	39.5	33.3

*Source: Fabrika agency (est. in Kadić-Maglajlić 2018: 23); estimates are based on official prices and do not take into account possible discounts.*

Competition for the advertising revenues has thus become ever harsher, and the lack of both regulation and self-regulation of advertising is a growing source of concern. In the struggle for advertising revenues, advertising prices have dropped, and are now reportedly considerably lower than in some of the neighbouring countries (mainly Croatia and Serbia). The largest part of advertising revenues still comes from TV advertising, but online advertising has been increasing. Fewer revenues have been recorded by radio and print media outlets and there are predictions that the downward trend might continue.

**Table BH 5. Advertising spending per media type, 2017 and 2018 (in million euro)**

Media	2017	2018
TV	26.22	25.08
Print	1.90	1.52
Radio	3.04	2.66
Online	1.90	3.04
OOH (and Other)	4.18 (0.76)	5.32 (0.72)

*Source: IPSOS.*

Other major issues affecting the advertising market are the diminished credibility of the audience measurement, and the interference of major political parties in advertising practices (see section 1.3.2).

On the other hand, many companies, particularly small and medium-sized ones, fail to recognise the possible benefits of advertising, and advertising agencies do not attempt to persuade them to engage in advertising. As a result, some experts believe there is a considerable unrealised potential in these businesses.<sup>1</sup>

<sup>1</sup> Dupanović 2018: 5, <https://bhnovinari.ba/wp-content/uploads/2018/08/58enovinar.pdf>.



### 1.3.2. Role of the government in media funding

The government allocates considerable funds to media through direct subsidies, commercial contracts with the media, and advertising by state bodies at different administrative levels. The overall amount of media financing from public budgets exceeds BAM 30 million and has in some years reached around or more than BAM 100 million (approx. €51 million). The majority of these funds (an estimated two-thirds) is allocated to public news agencies, occasionally to public service broadcasters (BHRT, RTVFBiH and RTRS) and regularly to local public broadcasters, funded through city, municipal, and cantonal budgets. The cantonal broadcasters receive the largest portion of these funds, with the public radio and television station TV SA having the biggest state subsidy, amounting to several million a year.

Most yearly allocations to individual media outlets range from BAM 30,000 to 120,000 (between approx. €15 and €61 million), but some are much higher (Table 6) and are primarily intended for media outlets founded by local governments. Although often small, these amounts are indispensable for the survival of numerous small local media, whose main income comes from public budgets.

**Table BH 6.** Government subsidies for media in 2017

Public body	Amount BAM (EUR)	Media outlet
Government of the Federation	17,000 (8,692)	Fena
Government of Republika Srpska	37,000 (18,918)	RTRS and State Agency Srna
Bosnian-Podrinje Canton	480,000 (245,420)	RTV Goražde and other media
Una-Sana Canton	1,640,000 (838,519)	RTV USK
Tuzla Canton	1,850,000 (945,890)	RTV TK
Kanton Sarajevo	3,350,000 (1,712,830)	RTV SA
Town of Bihać	348,874 (178,376)	RTV Bihać
Bileća	175,600 (89,783)	Radio Bileća
Čapljina	151,260 (77,338)	Public company Radio Čapljina
Doboj	200,000 (102,258)	Radio Doboj
Gradiška Pomoć	225,000 (115,041)	ODJP "Radio Gradiška"
Livno	120,000 (61,355)	RTV Livno
Lukavac	294,000 (150,320)	JU RTL
Vogošća	210,000 (107,371)	RTV Vogošća
Zenica	336,000 (171,794)	RTV Zenica

Source: CPI and also Hodžić and Sokol, 2018a.



These funds are allocated by means of non-transparent procedures which lack explicit and legitimate criteria and do not benefit from external expertise and advice.

Government funding, together with appointments of managerial staff in public media, is the main instrument of political interference in editorial policies. For example, many municipalities contract private media, particularly local outlets, to report on mayoral or overall municipal activities, local projects, assembly meetings, etc. Through such reporting, the private media in effect lend their platforms to promote the ruling parties, and it is a matter for concern that, in order to nurture good relations with the government and assure similar funding in the future, they might abandon critical reporting on the activities of local governments.

The government strongly interferes in advertising as well, in part through its direct engagement in advertising campaigns and placing of announcements in media, but more so by influencing the advertising of major domestic advertisers, in particular the public telecommunication companies BH Telekom and HT Mostar. These companies are strongly controlled by ruling political parties, which guide their advertising practices in accordance with the parties' current interests. It is difficult to obtain information about the allocation of such funds, particularly since telecommunications companies are exempted from the Law on Procurement, while other government bodies use the less transparent procurement procedures instead of publishing open calls. The ruling parties are believed to exert similar influence over advertising by private companies contracted in public procurement procedures.

**Table BH 7.** Examples of government advertising (and other related services) in 2016 and 2017

TV and other electronic media	Amount BAM (EUR)	Type of services
BH Telekom	12,000,000 (6,135,500)	Advertising
Lutrija BiH	500,000 (255,646)	Advertising
Bijeljina Municipality	50,000 (25,565)	Reporting on local government, promotion of tourism and local opportunities
Town of Doboje	84,999 (43,459)	Reporting on local government
Municipality of Gradiška	30,000 (15,339)	Reporting on political activities and other events in the area

*Source: Hodžić and Sokol, 2018b.*

To date, there have not been any reports of the government exerting pressure on independent media through selective tax enforcement, although several media companies are among the main tax debtors (particularly the public service broadcaster BHRT). It is also the case that the state is not considering tax concessions as a way to support the media sector, and the value added tax rate for all types of media remains the same as that for all other businesses (17%).



### **1.3.3. Donor funding**

Donor support has been pivotal in preserving independent media production in Bosnia and Herzegovina. The current media assistance by donors' ranges from direct support to media outlets (through media production grants or core support), to financing research and improvement of conditions in which the media are working.

However, direct donor support to media outlets is a very marginal source of the overall media funding, particularly compared with the funding provided by the government. The overall yearly donor support to BiH's media sector in recent years has likely not exceeded a few million euro, whereas annual government subsidies and other media-related spending has reportedly amounted to at least €15 million. While donor funding continues to be a critical factor in maintaining professional journalism, the majority of mainstream media operate with limited resources and have difficulties to offer quality journalism. Furthermore, while donor assistance is to some extent conditional on the intended sustainability of the proposed project, support programmes themselves have produced modest results in developing models and capacities to enhance the sustainability of independent journalism. Some of the recent donor programmes have, however, aimed to strengthen capacities that might contribute to the long-term sustainability of media outlets. Most notably, the current USAID BMAP programme includes yearly technical assistance and consultancy to key partners (Oslobođenje and Žurnal) worth around US\$25,000 per media outlet.<sup>2</sup>

The media-related initiatives of civil society organisations, financially supported by donors, include, for instance, providing improved legal assistance to journalists, as well as working to strengthen media institutions and self-regulatory bodies. Over the past several years, various donor programmes have offered support for research and advocacy focused on transparency of media ownership and media funding. This points to a growing recognition of the decisive role of funding in securing media independence and quality. The focus of these projects has been mainly on government spending in the media, which is currently considered largely corrupt. However theoretically, once restructured along the lines of transparency and clear criteria, this type of public spending has the potential to make a strong contribution to independent journalism. On the other hand, the role of advertising and of innovative business in sustainability of independent media remains under-investigated and somewhat neglected.

The table below shows some examples of current donor funding programmes, focusing on the most important donors (primarily EU and USAID), with examples of different types of supported projects.

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<sup>2</sup> Media, including key partners, can additionally apply for media production grants amounting to around US\$20,000. Oslobođenje also receives one of these grants. On top of this, Oslobođenje is the beneficiary of a grant within the USAID IMEP project, thanks to which they issued a print supplement for migrants on their rights in the territory of BiH. Vildana Selimbegović, interview, 9 August 2019.



**Table BH 8.** Donor funding in BiH: examples of ongoing programmes

Donor	Key focus area	Focus	Duration	Overall value	Grantees/partners	Purpose/type of action
EU	Media and Information Literacy (MIL) <sup>3</sup>	Regional	Dec 2017- Dec 2020	€0.96 million (for Western Balkans - WB)	7 media development organisations from the region	Media for Citizens - Citizens for Media. Building capacities of CSOs to promote MIL, through research, networking, education, regional exchange, online campaigns, funding of MIL initiatives by CSOs, etc.
	Freedom of media	National	Oct 2018- Oct 2021	€0.31 million	Association of a) journalists and b) electronic media <sup>4</sup>	Research and advocacy for the protection of media freedom, strengthening investigative journalism in local media, networking and exchanges.
USAID	Sustainability of independent media (BMAP programme)	Regional	Sep 2017 - Mar 2021	US\$8.6 million (for WB), including \$2.2 million for media production	Two key media partners plus grantees for media production	Strengthening the competitiveness and sustainability of independent media; support for creating more engaging content and for investments in technology
	Support to independent media (IMAP programme) <sup>5</sup>	National	Apr 2017 - Apr 2022	US\$5 million	Several dozen local and larger media outlets	Support for media that engage in professional and independent reporting, and their legal representation in politically motivated defamation lawsuits
	Investigative journalism	National	Sep 30, 2019 - Sep 30, 2024	US\$2.5 million	Centre for Development and Media Analysis (CRMA)	Support for investigative media reporting
Embassy of the Netherlands	Against Radicalisation and Violent Extremism	National	Sep 1, 2018 – Aug 31, 2020	€0.12 million	Foundation Mediacentar, KVART and “Kladuša je naša”	Improving the MIL skills of youth and their resistance to misinformation and extremist content <sup>6</sup>

Sources: written responses from the EU, USAID, MATRA in July/August 2019.

3 Similarly, the EU supported a €1.5 million-worth project implemented from December 2015 to April 2019 and entitled Building Trust in Media in South East Europe and Turkey, which involved research and advocacy on media literacy. A regional project for the period December 2015-December 2018, worth €1.19 million, focused on the protection of rights of journalists (reporting attacks, providing support, strengthening capacities of professional associations etc.), while another EU regional programme worth €2.5 million (for WB region), implemented in the period April 2016-March 2019, focused on reinforcing judicial expertise on freedom of expression, through education, awareness-raising and work of regulators.

4 BH novinari and ANEM. BH novinari also lead of a consortium that received a €225,000 grant in 2016-2018, for a project focused on research and advocacy on transparency of media ownership and funding.

5 Info on the programme at: <https://www.usaid.gov/bosnia/fact-sheets/fact-sheet-balkan-media-assistance-program>.

6 The Embassy of Netherlands provides yearly support, through MATRA programme, *inter alia* for promotion of media freedom and independence. In 2017-2018, it provided €0.29 million to media and civil society organisations for improving media funding, investigative journalism and access to media for persons with disabilities. MATRA provided support in 2019 as well, for projects worth up to €200,000 and with a duration of up to two years.



In addition, some embassies in BiH occasionally provide financial support for the media. For example, the Embassy of the Czech Republic recently launched a project to assist independent media, providing around €58,235 to independent communication platforms.<sup>7</sup>

While only scattered information on some of the media assistance programmes can be found, there seems to have been little or no attempt made in these projects to reflect a long-term vision for the media. Similarly, there are no indications of a coordinated approach by donors in their efforts to improve the media sector in BiH.

### **1.3.4. New, alternative sources of media funding**

Media outlets in BiH are introducing alternative sources of funding only to a limited extent. Firstly, some of the media outlets are diversifying their offer through new platforms and advertising packages. New advertising revenues are generated through specialised supplements such as the one targeting the BiH diaspora (in the online version of daily *Oslobođenje*). Other alternative models of funding are rarely introduced, and the revenues they generate are very modest. Examples include ad-free applications (e.g., the iPhone app for the Klix website), organisation of events such as concerts (Radio Active Zenica), enabling micro-donations from the public (Centre for Investigative Journalism CIN, Sarajevo), and community engagement in the media outlet's work, for example through journalism internships and work experience (e.g., Karike, Udar, Naša djeca). Crowdfunding, micro-donations and paid memberships are among the models that are ever more often considered by representatives of the media, but there remains an overall scepticism about their potential contribution to funding the media sector. For the time being, the capacity of the public to financially support quality journalism (given its economic position and the lack of a habit to pay for news and entertainment) is considered insufficient, and instead of pursuing such options, media prioritise extending the audience reach, while relying on donors for funding. Although not related to journalism initiatives, there have been some examples of one-off successful crowdfunding campaigns based around innovative ideas.<sup>8</sup>

## **1.4. Consumer base/audiences**

Media use trends in BiH in the past years have mostly been negative. IPSOS agency data suggests that all sectors of the media have seen either stagnation or a drop in their audience numbers over the past six years, with the exception of the online sector, whose audience is growing, surpassing the size of the TV audience in 2018.

Internet use is particularly popular among the 15-29-year-olds (96%), but is also high (80-91%) among those 30-49 years of age, and in the 50-64 population it reached almost 50%

<sup>7</sup> Website of the embassy, [https://www.mzv.cz/sarajevo/bs/Razvojna\\_saradnja/x2019\\_07\\_01\\_zahajeni\\_projektu\\_na\\_podporu\\_nezavislych\\_medii.html?fbclid=IwAROPQBKyspLLQMhsQ6cXlffl-ecptso71sj2gn9Rbr2WZ4ng0RNIcp4cVG4](https://www.mzv.cz/sarajevo/bs/Razvojna_saradnja/x2019_07_01_zahajeni_projektu_na_podporu_nezavislych_medii.html?fbclid=IwAROPQBKyspLLQMhsQ6cXlffl-ecptso71sj2gn9Rbr2WZ4ng0RNIcp4cVG4).

<sup>8</sup> A case in point is project Žene BiH, focused on the promotion of the role of women in the history of BiH. More at: <https://zenebih.ba/o-knjizi/>.



use in 2018 (IPSOS data for 2018). However, television is still considered the dominant source of news and information, especially for older generations. Across the media sectors, media outlets are facing fierce competition for audience from domestic, regional, and global media players, and only a minority of media outlets from BiH manage to attract an audience large enough to make a strong contribution to at least partial financial sustainability.

**Table BH 9. Audience reach by media type**

Media type	Audience reach
Print (dailies)*	444,663
Radio**	1,737,351
Internet	1,939,404
TV***	1,913,505
Magazines****	646,762

Source: Nielsen Audience Measurement; IPSOS MediaPuls.

Reach: total number of individuals exposed to the media.

\* Average issue readership.

\*\* Weekly reach.

\*\*\* Daily reach.

\*\*\*\* Total reach.

## 1.5. Competition, dominant position and its implications

Television audience measurement remains one of the weak points of the media business environment in BiH. In a 2016 decision, the Competition Council concluded that the company Audience Measurement abused a dominant market position by pricing differently the same audience measurement service, reducing the number of television stations involved in the measurement (compared to the original offer), and finally by denying the clients access to purchased audience data from previous years in the cases where they did not commission audience data for the upcoming year.<sup>9</sup> The company Audience Measurement was fined BAM 30,000 (approx. €15 million). This was one of the cases which damaged the trust in the current audience measurement system, and while there have been no similar decisions by the Council since, trust has never fully recovered.

Another area of contestation is the distribution of television channels. Media, TV distribution companies, advertising experts and other media industry players have been expressing concerns about the possible abuse of a dominant position in the area of TV distribution. The issue of concern is the strong position of United Group, with its subsidiary companies owning

<sup>9</sup> More in Pranjic, 2016, at: [https://bhnovinari.ba/wp-content/uploads/2012/06/bhn\\_e-novinar-april2016.pdf](https://bhnovinari.ba/wp-content/uploads/2012/06/bhn_e-novinar-april2016.pdf)



both TV channels and TV distribution business. Such cross-ownership leads to problems with competition as it enables “favouring its own programmes and applying overly high prices of its channels for other distributors”.<sup>10</sup> Three decisions of the independent state body, the Competition Council, indicate that the abuse of dominant position continued over the years. In its 2015 decision, the Council concluded that United Media Distribution SRL, Romania, through its representative Sport Klub Ltd, Sarajevo, continued to abuse its dominant position (while ignoring a previous decision on abuse from 2013) by applying different conditions and putting the actors in the companies that distribute sports channels with premium content in an unequal and disadvantaged position.<sup>11</sup>

A 2017 decision notes that the abuse continued, with United Media Distribution/Sport Klub Ltd.:

*“...intentionally delaying and not signing the contract on the distribution of the channel “Sport Klub” with the business entity BH Telecom, by means of constantly imposing additional conditions (...), which were not stipulated through the ‘General conditions for service providers’, and which were not applied to the business entities having already concluded the contracts on the distribution of the said channel.”<sup>12</sup>*

By applying different conditions, United Media (i.e. Sport Klub) had placed BH Telecom in an unequal and unfavourable position. The focus of these controversies was the broadcasting package of live English Premier League, which is among the most popular sports programmes. However, United Media S.à.r.l., based in Luxemburg, called the decisions ungrounded and claimed the process from 2017 was used to pressure the company to lower the price of the rights of distribution of Sport Klub. Furthermore they claimed that the offer with identical conditions was delivered to interested distributors several times during 2016 and 2017.<sup>13</sup> On the contrary, ACOP, the association of cable operators and distributors in BiH, claims that the problematic practices of Telemach (i.e., United Media Distribution) have continued even in 2019.<sup>14</sup> Despite possible pressure coming from the competitors of United Group and perhaps even the state (as majority owner of its main competitor, BH Telekom),<sup>15</sup> the decisions of

<sup>10</sup> MSI IREX, 2019: 13.

<sup>11</sup> Competition Council press release, at: <http://bihkonk.gov.ba/saopcenje-za-medije-sa-116-sjednice-konkurencijskog-vije-ca-bosne-i-hercegovine.html>. The Court of BiH confirmed that the Council’s decision from 2013 was legitimate and based on established facts. More at: [http://www.sudbih.gov.ba/bundles/websitenews/gallery/predmet/3815/1521457942014981\\_14\\_U\\_SC\\_IKO\\_BALKAN\\_SRL\\_zloupotreba\\_dominatnog\\_polozaja.pdf](http://www.sudbih.gov.ba/bundles/websitenews/gallery/predmet/3815/1521457942014981_14_U_SC_IKO_BALKAN_SRL_zloupotreba_dominatnog_polozaja.pdf).

<sup>12</sup> Decision available at: <http://bihkonk.gov.ba/datoteka/Rjesenje-BH-Telecom-d.-d.-20122017-bos.pdf>.

<sup>13</sup> N1, 29 December 2017, <http://ba.n1info.com/Vijesti/a235207/United-media-Nismo-ucestvovali-u-bio-kakvom-postupku-KV-BiH.html>. While United Group also claimed that United Media Distribution from Romania is no longer part of the group, and thus does not distribute Sport Klub, other sources claim this was just a manoeuvre for United Group to avoid accountability. See, for example, magazine Buka, 6 January 2016. <https://www.6yka.com/novosti/radosna-vijest-konacno-sport-klub-svima>.

<sup>14</sup> In 2019, ACOP issued a statement calling on the state authorities to order Telemach to make the Sport Klub programmes available to all operators in the country. Kapital.ba, 14 March 2019, <https://www.capital.ba/akop-bih-pozvao-drzavne-institucije-da-sprijece-medijski-monopol-telemacha/>.

<sup>15</sup> There have been several disputes between BH Telekom and Telemach (part of United Group), with complaints filed with the Competition Council over the years, so far all judged in favour of BH Telekom. See for example the cases here: <http://bihkonk.gov.ba/page/2?s=BH+Telecom>.



the Council concerning the United Group seem well-grounded. Nevertheless, the question remains whether such a domination of a single group in both the broadcasting of premium sports content and the control of TV distribution platforms constitutes a business environment which enables media pluralism, particularly in poor media markets and fragile media systems. Unlike in the other countries in the region, the competition regulator in Slovenia has judged that such a position is incompatible with competition rules and ordered the United Group to sell its sports channels.<sup>16</sup>

Overall, broadcasters in BiH are increasingly losing the capacity to compete with the financially stronger regional players (mainly the United Group, pan-European Eurosport, and also Arena Sport channels owned by Telekom Srbija, a national telecommunications company, in which the Republic of Serbia has a majority stake) in acquiring the rights of broadcasting for big sporting events. This trend is worrying for BiH media, given that it is precisely these programmes that bring in a large portion of advertising revenues, due to their great popularity.<sup>17</sup> In addition to financial reasons, these trends are also a result of a new UEFA policy to no longer sell broadcasting rights to the association of public service broadcasters, but on a market-by-market basis to the strongest bidder.

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<sup>16</sup> See News, 19 September 2018, <https://seenews.com/news/slovenias-competition-agency-orders-united-group-to-dispose-of-sport-klub-channels-627152>.

<sup>17</sup> Public service broadcaster RTRS shares some broadcasting rights with the regional players. BHRT still held broadcasting rights for the World Cup in Russia in 2018, but the broadcasting rights for World Cup 2022 are yet to be announced.



**Table BH 10.** Main holders of sports broadcasting rights

Ownership	Media outlet	Sporting event
United Group	Nova TV, Sport Klub - DIRECT MEDIA d.o.o	UEFA Euro 2020
	Nova BH (only BiH matches), Sport Klub (all matches) DIRECT MEDIA d.o.o	UEFA Nations League (through 2021)
	Sport Klub	English Premier League
	Sport Klub	Spanish La Liga
	Sport Klub	NBA
	Sport Klub	Euroleague
	Sport Klub	Formula 1
Telekom Serbia	Arena Sport - TELEKOM SRBIJA A.D	UEFA Europa League
	Arena Sport	FIBA Champions League Basketball
	Arena Sport	French Ligue 1
Eurosport	Eurosport	Australian Open
	Eurosport	US Open
Mixed	Arena Sport - TELEKOM SRBIJA A.D Nova TV and Sport Klub - DIRECT MEDIA d.o.o	UEFA Champions League
	Arena Sport - TELEKOM SRBIJA A.D Sport Klub - DIRECT MEDIA d.o.o	UEFA Super Cup
	Arena Sport, RTRS (one match on Sunday)	Italian Serie A
	Eurosport, RTRS	Tennis, Roland Garros
	Eurosport, Sport Klub, RTRS	Tennis, Wimbledon

Sources: Web pages and documents of sport associations and leagues, media reports and other sources.<sup>18</sup>

Some analysts suspect that media outlets in a favourable market position (larger regional groups and media outlets funded by the government, in particular) are drastically “dumping” advertising rates, thus devaluing the advertising market and putting additional financial pressure on independent media. These media outlets often have custom-made offers and advertising ‘bundles’ which most of the other participants on the market cannot afford to make. “The range of discounts granted by these media is completely non-transparent and goes up to 75 percent” (Kadić-Maglajlić, 2018: 32). In addition, the Communications Regulatory Agency has found some violations of the maximum allowed time for placement of advertising (12 minutes per hour for commercial television broadcasters), as defined by the Code of Commercial Communications.<sup>19</sup>

18 Such as: on Premier League and here; UEFA, on Supercup; Ligue 1, Euroleague, [https://en.wikipedia.org/wiki/List\\_of\\_Serie\\_A\\_broadcasters](https://en.wikipedia.org/wiki/List_of_Serie_A_broadcasters), news on 24sata.hr on NBA broadcasting rights, etc.

19 For instance, in 2017, ATV was fined BAM 14,000 (approx. €7,150) and TV Hayat BAM 8,000 (approx. €4,100). Source: CRA, at <https://rak.ba/bs-Latn-BA/news/544>.



Overall, media funding in general, and advertising in particular, lack transparency, and questions remain concerning the integrity of the audience measurement system. There is a need for media advertising industry associations to engage in self-regulation, and for state institutions to engage in better regulation in these areas.

## 1.6. Media industry associations

There are a number of associations of the media industry in BiH, but most of them are largely inactive: they rarely engage in joint initiatives and rarely articulate the need to improve the conditions of media funding. Initially supported by USAID Media/ Chemonics Inc. International, the Association of Media Industry (UMI) had an important role in commissioning TV audience measurements in BiH, but it lost this essential function in 2013 due to a series of controversies related to diverging interests of its members.<sup>20</sup> This was a large setback for the media industry, and a series of controversies with TV audience measurement since<sup>21</sup> have shown that the risk of abuse is much greater now when audience measurement is provided through direct contracts between media outlets and advertising agencies.<sup>22</sup>

**Table BH 11. Media industry associations**

Association	Details
The Association of Media Industry (UMI)	Founded in 2005. Previously contracting the audience data provider for audience research, but mostly inactive in recent years.
The Association of Electronic Media (AEM BiH)	Founded in 2018. Its mission includes improvement of production, transmission and broadcasting, promotion of coordinated market research and opinion polling.
Association of Radio Stations of RS (URS)	Engaged on copyright issues, together with AEM and PEM.
PEM – Association of Private Electronic Media	Engaged on copyright issues, together with AEM and URS. <sup>23</sup>

Source: Registry of Ministry of Justice of BiH.<sup>24</sup>

20 See more in Hodžić, S. 2014. In Petković (ed.) Media Integrity Matters, [http://mediaobservatory.net/sites/default/files/media%20integrity%20matters\\_z%20web\\_2.pdf](http://mediaobservatory.net/sites/default/files/media%20integrity%20matters_z%20web_2.pdf).

21 Including the above-mentioned ruling of the Competition Council that showed the company Audience Measurement provided the same audience measurement services at different prices.

22 In contrast, commissioning of advertising data jointly through an association of media outlets and advertising agencies, and a measurement that would function on a non-profit basis and would be subject to occasional monitoring, is considered a better approach to minimise manipulations with audience data. See Krajnc, 2018, [https://www.media.ba/sites/default/files/izvjestaj\\_-\\_bhs.pdf](https://www.media.ba/sites/default/files/izvjestaj_-_bhs.pdf), p. 13.

23 See more at the website of the association for protection of copyrights.

24 The list is not exhaustive, as there are other associations, mostly inactive, such as the Association of distributors of media services; UDMU (Network of associations of private electronic media of SEE Europe); DINAMA (Association of digital and interactive advertisers and media outlets), CENEM (association Centre for Independent media). The Registry of Ministry of Justice of BiH is available at: <http://zbirniregistri.gov.ba>.



Finally, there are no associations of advertisers that could introduce self-regulation in the advertising industry. While measures for protection of the audience are included in the regulations regarding advertising content in broadcast media, advertising in other media sectors remains completely unregulated. Similarly, there is no regulation of government advertising that would be aimed at limiting political abuse of advertising spending by rewarding media loyal to the government.



## **2. ECONOMIC SITUATION AND NEEDS OF INDEPENDENT MEDIA<sup>25</sup>**



Independent journalism can be found in different types of media outlets in BiH, ranging from media functioning as non-governmental organisations that are funded mainly or entirely by international donors, through media receiving financial support from global networks (corporate or connected to foreign governments), to private BiH media financed mainly through advertising.

## 2.1. Who they are

Below we list some examples of independent media in BiH, with different types of ownership. We also provide a list of valuable new media initiatives. For all of them we elaborate the main features indicative of their relative independence.

**Table BH 12.** Examples of independent media

Media outlet	Main features
Centre for Investigative Journalism (CIN)	Online investigative journalism portal, founded by domestic and international media professionals, based in Sarajevo. CIN regularly produces content and contributes to pluralism, being the only website in BiH dedicated entirely to investigative journalism. It has a proven record of respect for professional standards and has won several awards for journalistic excellence. CIN has a good level of transparency, as it publishes the names of its founders (domestic and foreign experts). It is funded mainly through international assistance and, to a small extent, through citizens' donations.
Žurnal	An NGO-run online portal, based in Sarajevo. It provides regular content, and its contribution to pluralism mainly comes from reporting on corruption, having made headlines in BiH, reporting on the entire political spectrum and on marginalised groups. It has received several awards for unbiased and professional reporting. Žurnal upholds minimum transparency: the information is available on the website of the Centre for Media Development and Analysis. However, more detailed information on CRMA structures is not actively disclosed. The portal is funded entirely through international media assistance programmes. Currently, Žurnal is one of the key media partners of the USAID-funded Balkan Media Assistance Programme (BMAP).
Radio Sarajevo	A private online media outlet, based in Sarajevo. It provides daily reports, mostly considered balanced and reliable, as well as columns by reputable writers and infographics that contribute to pluralism. This quality content distinguishes the media outlet positively from its competitors. A good level of transparency and accountability is exercised by publishing contact details, information on ownership, editorial board, and director. Radio Sarajevo is mainly funded from ads, but a considerable portion of its revenues comes from donor support as well.
Oslobođenje	Private daily and online portal where the majority owner is a company linked to a member of the Selimović family (known for other businesses such as brewing, a flour mill, a printing press, etc.). The data on owners are available at the online Registry of Business Entities. Oslobođenje demonstrates accountability by publishing the information on its structures and contact data. Although the Selimović family is considered to be affiliated with the SDA party, this outlet provides mostly balanced daily reporting on socio-political events, thus contributing to pluralism. Oslobođenje is for the major part funded through advertising, but also receives international assistance and is currently one of the key media partners of the USAID-funded BMAP.

25 Note: this part of the research is primarily based on four in-depth interviews (conducted with Lejla Bičakčić, CIN; Elvir Padalović, Buka; Ernad Bihorac, Radio Active, Zenica; Vildana Selimbegović, Oslobođenje); two short interviews (Predrag Blagovčanin, Tačno.net; Dženana Alađuz, organisation Infohouse and website Interview.ba) and four written replies by media representatives (Udar.net, Karika, Trend radio, Diskriminacija.ba).



Media outlet	Main features
Radio Slobodna Evropa/Radio Free Europe (RSE)	A foreign media organisation with local offices across the region. While the fact that it is funded by the US government possibly indicates some leaning towards US foreign policy interests, the outlet is generally considered balanced and professional. It provides quality analyses and well-grounded opinion pieces, adheres to professional standards, and contributes to plurality by including the voices of marginalised groups. It is funded by the US Congress (US Agency for Global Media). RSE publishes all major information on ownership, funding and contact details, thus exhibiting a high level of accountability. RSE content is used by many mainstream media outlets, thus reaching a larger audience.
TV N1	CNN-affiliated broadcaster and online portal, with regional offices in Croatia, Serbia, and BiH. It is part of United Group, a telecom and media provider in Southeast Europe, previously owned by US investment fund KKR and currently by BC Partners. N1 shows a good level of accountability, given that some information on its structures is actively published by N1, while other data is easily accessible through other sources (such as the website of United Group). The media outlet complies with professional standards and contributes to public interest and media pluralism by well-resourced reporting also covering marginalised groups. It provides balanced reporting, particularly on local and regional issues. The respondents interviewed suggest the audience share of N1 has been growing and its content is valued for its technological and content quality. The business operations also include selling some ad space but funding is assured on the level of the entire media group.

**Table BH 13. Selected new media initiatives**

Media outlet	Main features
Udar.net	NGO portal, known for its work in vocalising the issues affecting the Roma community, thereby making a valuable contribution to media pluralism. It also provides regular content. Udar demonstrates accountability by publishing the information on the editorial board and contact information; its ownership data is not actively published, but it is widely known that the outlet is run by NGO Medijske Inicijative (MI), and the MI website provides the information on those in charge. Udar is supported by international donors, mainly USAID.
Diskriminacija.ba	NGO website. Since 2010 it has been providing reports on discrimination and human rights issues, thus contributing to pluralism of the media offer in BiH. From 2018, it also began functioning as a kind of news agency providing media outlets with ready material on issues related to discrimination and human rights. Since many mainstream media use these reports, human rights issues are gaining more visibility. Diskriminacija.ba demonstrates its accountability by respecting the ethical standards and actively publishing the information on the project leader - Mediacentar Sarajevo, partners and donors. It receives funding through international assistance, in 2018, for instance, mainly from USAID and the Open Society Foundation Sarajevo.

*Source: Websites of the organisations and responses by their representatives from September 2019.*

The list is only illustrative and is by no means exhaustive, as there are a number of other media outlets considered independent, such as the NGO media Buka (Banja Luka) and Tačno.net (Mostar); media outlets which can be considered community media in terms of their focus and/or their type of registration and non-profit status, such as UPS (Srebrenica), Karike (Sarajevo), Radio Active Zenica, eFM radio (online); media which are part of regional or global groups, such as N1 and Al Jazeera; and private BiH media which can be considered relatively independent, such as Klix.



## 2.2. The economic situation and needs of the selected examples of independent media

The economic viability of independent media is hanging by a thread: overall advertising revenues are decreasing and advertising practices are largely corrupt, while assistance programmes by international donors generally do not contain a longer-term commitment to media support.

Thus, most of these media have no firm prospects of sustainability beyond one or two years. For the time being, however, the major independent media manage to secure the revenues needed for their operations.<sup>26</sup> An annual budget of independent media ranges from less than €10,000 in the case of smaller local media, to €500,000 in the case of larger online platforms, and up to a few millions for large television stations.

The drop in the advertising revenues generally and the fragmentation of the advertising market along ethnic and entity lines make competition for advertising onerous. Furthermore, advertising in BiH is heavily influenced by political and other interests. As a result, certain media outlets are favoured whereas media known for reporting critically on the government are largely avoided by advertisers. As one of our interviewees noted:

*“It is known that media are under harsh political pressures and that all attempts to stay independent come at a price. The price is manifested in (...) being forsaken by advertisers and in different kinds of other pressures (...)”*  
(Vildana Selimbegović, editor-in-chief, *Oslobođenje*).<sup>27</sup>

In turn, some of the independent media have abandoned advertising and instead rely completely on donor support (e.g., *Buka*, *Tačno.net*). Some respondents also believe that – similar to the government funding, or funding by certain business corporations – advertising can compromise one’s public image of independence.<sup>28</sup>

In addition, media outlets specialising in a specific thematic area or type of journalism, such as investigative reporting, reporting on discrimination, and/or on the issues concerning particular

<sup>26</sup> We looked into the data on eight publishers of independent media held by the Ministry of Justice of Federation BiH and the Financial Intelligence Agency of FBiH, as well the data provided by one publisher. The conclusion should not be generalised to all independent media, since not all of them are included in the above registries, but fall under jurisdictions of either courts or ministries at different administrative levels (state, municipal or cantonal). This research stopped short of making inquiries with all of these institutions/administrative levels.

<sup>27</sup> Interview, 20 July 2019.

<sup>28</sup> Lejla Bičakčić, director of CIN, interview 17 July 2019. Director of CIN, for example, reports that international corporations have offered to pay for some investigations, which CIN refused in order to keep their image untarnished.



social groups (as minorities, smaller communities in geographical terms, etc.), may be providing content of extraordinary public importance and may have their established audiences, but this often makes them even less attractive to advertisers. For example, the Udar website “covers marginalised groups and human rights (to a large extent), and that is mostly not interesting for commercial clients”.<sup>29</sup> Finally, non-profit radio stations (such as Radio Active) are not allowed to pursue advertising revenues.<sup>30</sup>

Therefore, not only media functioning as NGOs depend on donor funding, but private media, too, look for donor assistance (see Table 14). This is the case with even some of the most visited online platforms, and our interviewees point out that seeking supplementary donor funding is often a necessary strategy to compensate for the lack of options as regards advertising.<sup>31</sup>

**Table BH 14.** Structure of revenues of some independent media outlets

Media outlet	Type of ownership	Sources of revenues
CIN	NGO	Almost 100% donor funded
Radio Sarajevo	private	70% advertising, 30% donor funding
Oslobođenje	private	>70% advertising; <30% donor funding and other sources
Buka	NGO	95% donor funding; 5% advertising
Udar	NGO	95% of donor funding and 5% through the own contribution of Media Initiatives (volunteering and technical equipment).

*Source: representatives of the listed media, in interviews or written correspondence.*

For these reasons, many independent media tie their future to programmes of donor support, and focus on developing strategies to contract such funding. For example, a) they apply for funding not only through programmes specifically targeting media, but also those in areas of democratisation generally, rule of law, transparency, anti-corruption, etc. (e.g., CIN); and b) they also pursue diversification of their production formats in order to increase their eligibility for different donor programmes providing technical assistance to media (e.g., Buka has its own website, radio and TV production and is eligible for donor support in media production in each of these sectors).

There are not so many media outlets that attempt to diversify their content and/or to modernise their offers for placing advertisements in order to attract new audiences and advertisers. One example is the daily Oslobođenje, which started:

<sup>29</sup> Written reply, Udar, July 2019.

<sup>30</sup> Rule 76/2015 of the Communications Regulatory Agency, Article 12. These funding constraints account in part to the fact that non-profit sector currently consists of only three radio stations.

<sup>31</sup> Senad Zaimović, director of agency Fabrika and co-owner of Radio Sarajevo, interview, 20 June 2019.



*“...working with [specialised] teams to develop new tools for digital marketing, i.e. different offers (...). We have marketing partners for specialised sub-page Moja BiH, which is aimed at the diaspora, and we have set up a sub-page Raiffeisen, which is truly a new form of and approach to marketing” (Vildana Selimbegović, editor-in-chief, Oslobođenje).<sup>32</sup>*

Oslobođenje has additionally engaged in the production of print publications for children and youth (Dječja i omladinska štampa) since autumn 2019. Buka is planning to develop its strategy for strengthening mobile advertising, given that their preliminary internal assessment suggests that mobile advertising is increasingly appealing to advertisers.

Examples of some other, but less important sources of revenues for independent media include, for instance, organisation of music concerts (Radio Active Zenica) or engagement of outlet’s staff in journalist training (CIN). Some are considering generating income by introducing a paid subscription for some of the content (e.g., CIN), launching crowdfunding campaigns (e.g., Buka), and other types of initiatives (e.g., tech-savvy employees of Radio Active, Zenica, are considering developing specialised software).<sup>33</sup> However, subscription, paid content and crowdfunding do not look very promising, in the light of the low socio-economic status of media audiences in BiH. Some representatives of well-established independent platforms even believe that introducing a paid subscription could backfire in terms of reducing the current audience reach:

*“We have a significant number of subscribers, but (...) this number will fall considerably once we offer a paid subscription (...) We can possibly consider commercialisation of specialised content, databases (...) photographs, for example, infographics, videos and similar, but we are talking about extremely little money we could collect in contrast to what we are getting with the open content that is available to a large number of citizens. For us, the primary focus is on reach and not on commercial revenues” (Lejla Bičakčić, director of CIN).<sup>34</sup>*

This scepticism was shared by representatives of the independent media listed among the 15 highest-ranked online media (including Radio Sarajevo and Oslobođenje), as well as by those with an established platform with sizeable and loyal audience (such as CIN, as mentioned above), while for newer and smaller independent media, crowdfunding is considered to be even less viable.

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<sup>32</sup> Interview, 20 July 2019.

<sup>33</sup> They did not specify what kind of software. Interview, 18 July 2019.

<sup>34</sup> Interview, 17 July 2019.



## 2.3. The needs of the selected independent media and new initiatives

The operational needs of the selected independent media include, above all, strengthening of technical resources, education/training, and employing more staff (left column, Table 15).

Beyond this, there is a number of more structural needs that require establishing effective self-regulation in media and advertising industry, changes of government policies, as well as improvements of the donor support programmes (right column, Table 15).

**Table BH 15.** The needs of independent media

Operational/ organisational, internal needs	Needs related to media environment
<ul style="list-style-type: none"> <li>• <b>Technical advancement</b> (e.g., CIN, Oslobođenje, Trend Radio, Tačno.net, Karika)</li> <li>• <b>Education and training</b> (e.g., Udar, Tačno.net; training in cutting-edge journalistic tools at CIN)</li> <li>• <b>Employing more staff</b> (e.g., Tačno.net; Udar, Diskriminacija)</li> <li>• <b>Raising professional standards in production</b>, to avoid lawsuits for defamation (e.g., CIN)</li> <li>• <b>Providing assistance in cases of lawsuits and pressures</b> - legal, psychological, etc. (e.g., CIN)</li> <li>• <b>Strengthening the capacities to generate revenues and strengthen the audience base</b> (more below).</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Improving transparency of media ownership and funding</b> through better regulation and self-regulation</li> <li>• <b>Restoring integrity of TV audience measurement</b></li> <li>• <b>Ensuring that government funding is used as support for independent and quality journalism</b></li> <li>• <b>Adapting donor support to the needs of independent media</b></li> <li>• <b>Long-term engagement</b> of both the donors and the government in supporting independent journalism</li> <li>• <b>Raising public awareness</b> about the role and position of independent media and about alternative funding models (crowdfunding, micro-donations)</li> <li>• <b>Enabling easy online payments</b> (including through PayPal).</li> </ul>

Government funding is recognised as an important factor in media financing in BiH. While it is currently heavily instrumentalised,<sup>35</sup> the civic sector advocates for developing policies and implementation and monitoring mechanisms that would increase transparency and reflect public interest in selecting beneficiaries of such funding. It is therefore essential to establish public-interest criteria and set up credible and independent selection committees for distribution of public funds to the media. This could be done on the condition that the relevant ministries take part in developing such policies and practices. To this end, the media community and non-governmental sector should continue the advocacy in this regard, and donor community should promote and support such initiatives.

<sup>35</sup> See more in Hodžić and Sokol, 2018a and 2018b.



With regard to donor support, there are a number of weaknesses identified by media representatives (Table 16). The overriding need is to tailor donor support to the particular needs of various types of media outlets, whereby the key criteria for selecting beneficiaries would be the professional quality and independence of the media organisation.

**Table BH 16.** Weaknesses and needs concerning international donor support to media

Challenges	Investment needs
Excessively formalistic criteria for selection of beneficiaries	<ul style="list-style-type: none"> <li>The quality of the ideas underlying the project proposal as well as the professional track-record of the applicant should be the key criteria;</li> <li>Reduce formal criteria to only the most relevant ones;</li> </ul>
Short term support (1-1.5 years), which implies uncertainty and disables strategic planning	<ul style="list-style-type: none"> <li>Design support programmes to last a minimum of 2-5 years, and</li> <li>Contribute to the development of business models that enhance the sustainability of the beneficiary.</li> </ul>
Support for producing particular content prevails instead of vital core support	<ul style="list-style-type: none"> <li>Include core support in donor programmes, conditional on implementing a strategy for organisational development and on sustained production of content in the public interest.</li> </ul>
Focus on media and organisations from bigger cities	<ul style="list-style-type: none"> <li>Provide donor support to media and NGOs based in smaller communities as well.</li> </ul>

Media representatives particularly point out that support programmes provided by the European Union are overly bureaucratized and that some independent media fail to receive support because of that. One of our interviewees also indicated that media outlets, unlike NGOs, do not necessarily have the necessary skills for writing elaborate project proposals:

*“So far we haven’t managed to pass in any of the big EC calls, although we applied 2-3 times (...) We have been receiving the maximum points for the project idea, but we ‘failed’ on gender issues and ecology because we did not know what to write there” (Elvir Padalović, Buka, Banja Luka).*

Other respondents point out that the programmes are often focused on promotion of EU values and thereby, for example, a) exclude projects focused on investigative journalism or b) neglect soft news content (news features, human-interest stories, etc.). Thus, there is an overall need to support diverse media production and diverse media profiles, as well as to provide core support for media organisations, which would enable media to strengthen their capacities and invest in business and programme development in general. Specialised programmes aimed at improvement of technical capacities and based on consultancy provided by external experts could fill this gap, but it is crucial that they be organised in a way to meet the specific needs and profile of an individual media outlet. The editor-in-chief of the daily *Oslobođenje* appreciates immensely this type of support received from USAID under the Balkan Media Assistance Programme. For *Oslobođenje*, this support has enabled them to analyse their operations and develop strategies (including digital development and digital marketing) in consultation with experts:



*“We have the expert support which is immense and which we truly could not have had (ourselves) (...). One simply does not have a chance to think in this way (...). We are talking about serious investments in the knowledge which is here, I dare to say, very fragile because we do not have this type of services (...)” (Vildana Selimbegović, editor-in-chief, Oslobođenje).<sup>36</sup>*

In terms of capacity development, the needs depend on the individual media outlet. For example, some independent media outlets, especially smaller and less established ones, lack expertise in marketing (digital marketing in particular),<sup>37</sup> or lack experience in networking, which makes it even more difficult for them to attract the attention of advertisers and donors.<sup>38</sup>

## 2.4. Opportunities for growth (new approaches)

There is a considerable potential for independent media to expand their audience base and familiarise audiences, donors and advertisers with their content and offer. This potential lies mainly in new/digital production, cooperation, dissemination and interaction tools. By realising this potential, media outlets would increase their chances to achieve sustainability based on variety of sources such as advertising, international support and contributions from citizens and communities, e.g., crowdfunding, membership, etc. The trends in audience behaviour, such as the ones listed in the table below, can be exploited to develop interactions with audiences.

**Table BH 17.** Audience behaviour and responses by the media

Current developments	Existing or future responses by the media
Large number of visitors coming from social networks	Efforts to improve the appeal of the posts on social networks
Less interest in written text and more in video, infographics, visualisations	Formatting stories to follow such trends (visual content, segmenting of stories into sequels, etc.)
Blogs proved to be increasingly important in articulating the interests of audiences	Efforts to animate and engage top authors
Increasing feedback from audiences in the form of tip-offs and suggestions	Promoting interaction with audiences, initiating investigations based on initial data provided by the citizens, making public the impact of audience input

<sup>36</sup> Interview, 20 July 2019.

<sup>37</sup> As noted by Dženana Alađuz, Interview.ba, short interview, July 2019.

<sup>38</sup> Ernad Bihorac, director of association Naša djeca and Radio Active, Zenica, interview, 18 July 2019.



Furthermore, major investigations, reports or commentaries of some of these independent media outlets reach a wider audience when they are picked up by mainstream media. For example, CIN estimates that it reached 8.5 million people in 2018 through websites, social networks and republishing of their content by other media.<sup>39</sup>

Therefore, there is a great potential that lies in cooperation and collaboration: exchange of information, as well as exchange or republishing of valuable content. This can be achieved not only through cooperation between media outlets, but also cooperation between journalists outside of their media organisations. One example of this is the Facebook page *Izbjegličke priče* (“Refugees’ Stories”),<sup>40</sup> established with the intention of enabling journalists to network and provide more comprehensive and balanced reporting on issues related to refugees and migrants, as an alternative to the largely stereotyped reports provided by many mainstream media. Another example of a valuable cooperation among different media platforms is an initiative of *Diskriminacija.ba*, run by *Mediacentar Sarajevo*. The platform publishes information on human-rights issues, primarily from NGOs, prepares media materials and distributes them to media outlets, which then may re-publish them (depending on the story). Among media outlets republishing the materials are *N1*, *Buka*, *Fokus*, *Faktor*, *Hayat*, *RTVFBiH*, *eTrafika*, *Tuzlanski.ba*, *Cazin.net*, *Bljesak*, and *Otvorena mreža*. This “agency” model of *Diskriminacija.ba* harbours a considerable potential that could be expanded on condition of increasing the number of staff.

As a long-term goal, media and citizens could become more inclined to buy content from or buy access to databases of platforms such as *Diskriminacija* or *CIN*, which might provide a potential source of funding in the future.

For now, the isolated examples of crowdfunding are related to non-journalistic projects, and one-off campaigns built around an already well-known and original idea (notably *Žene BiH*).<sup>41</sup> These precedents bring hope that similar models could be translated into media funding as well. This case indicates the importance that the public appeal of the idea has in garnering support, but it also illustrates the need to invest in brand building and promotion prior to crowdfunding initiatives. Micro-donations and crowdfunding are, however, unlikely to be a significant source of revenues for quality independent media, at least in the next five years or more.

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39 Surprisingly, *CIN* has recently registered a high percentage of younger audience (30% of the audience is 25-35 years old). Lejla Bičakčić, *CIN*, interview, 17 July 2019.

40 See more at <https://www.facebook.com/izbjeglickeprice/>.

41 See more at <https://zenebih.ba/o-knjizi/>.



Finally, community engagement, i.e., involving users in providing information and content (either unsolicited and on an *ad hoc* basis, or solicited) has an increasing potential for BiH media outlets. For instance, media outlets focusing on youth (such as Karike and Radio Active) directly engage members of their target community to work for them as journalists on a voluntary and freelance basis. As one respondent noted:

*“This is upheld by the people involved in this media outlet and if there were no people there would be no outlet either. The young people develop the outlet (...) give their time and this is what makes it sustainable” (Ernad Bihorac, Radio Active, Zenica).<sup>42</sup>*

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<sup>42</sup> Interview, 18 July 2019.



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