



CS2. Country case studies on critical junctures in the media transformation process in Four Domains of Potential ROs (2000–2020)

The aim of the second case study is to provide analysis of risks and opportunities concerning the diachronic changes in four domains defined by the project in the 21st century.

Excerpt:



An option for reference of this particular report:

Peruško, Z.; Vozab, D.; Nenadić, I. (2022). CROATIA. Critical junctures in the media transformation process. In: Country case studies on critical junctures in the media transformation process in Four Domains of Potential ROs (2000–2020). *Approaching deliberative communication: Studies on monitoring capability and on critical junctures of media development in 14 EU countries*, CS2, D-2.1, pp. 82–141. Mediadelcom.
<https://www.mediadelcom.eu/publications/d21-case-study-2/hrv/>



CROATIA

Critical junctures in the media transformation process

By Zrinjka Peruško, Dina Vozab & Iva Nenadić, University of Zagreb⁴

Executive Summary

The present study details the critical junctures in the transformations of risks and opportunities in the four domains of media systems – the Legal and ethical environment, Journalism, Media usage, and Media-related competencies domain – that are expected to contribute to or deter from deliberative communication. Study includes a background chapter on social and political changes that influenced the four key domains Croatia.

The study is based on the literature and other data sources identified in Case study 1 “*Risks and Opportunities Related to Media and Journalism Studies (2000–2020). Case Study on National Research and Monitoring Capabilities*”, but goes beyond it by offering an in-depth analyses of changes within each domain and identifying the actors behind them. Legal framework in Croatia is in most respects in accordance with European standards, but a degree of conflicting legislation exists regarding defamation offences. Frequent legislative changes (although most without a change of direction) show that a coherent policy-led system has not yet materialized. Evidence of hybridity of the media system is seen in media and related practices, which take place in a diverse yet highly concentrated media system, most similar to the Mediterranean polarized pluralist media system model from the Hallin and Mancini (2004) typology. Media-related competencies and media literacy appear to be higher in some areas and population groups than in others. Journalism market is diverse although subject to economic constrictions as well as pressures on journalists in the form of many SLAPP lawsuits.

1. Introduction

According to the latest population census, Croatia is a country with 3.88 million inhabitants, a significant demographic decline from 4.28 million in the 2011 census (DZS, 2021). The country is ethnically homogenous, with 90 % of Croatians. Serbs are the largest minority (4,5 % of the total population), followed by Bosniak, Albanian, Italian, and Hungarian minorities (all with less than 1 %). Various other smaller ethnic groups also live in Croatia. Croatia was historically, and continues to be, predominantly a Catholic country, with historical Serbian Christian Orthodox populations and the well-integrated historical Muslim (Bosniak) minority, as well as various other religious denominations.

The country declared independence from the SFR Yugoslavia in 1991, which was followed by the war for independence and a challenging process of post-socialist transition and democratization (for a comprehensive overview of the history of media development in Croatia since the 15th century in the context of political & economic changes see Peruško et al., 2021). Croatia became an EU member state in 2013. The strongest political party in the country is the center-

⁴ Authors would like to thank Filip Trbojević for his contribution in editing both studies and the references.

right Croatian Democratic Union (HDZ), which won most elections since the country's independence and is currently again in government. After major economic losses amid the COVID-19 pandemic, the country had a strong rebound of the economy in 2021, and GDP is expected to grow in 2022 at a more modest rate (World Bank, 2022).⁵ Considering its size and population, Croatia has a relatively diverse media sector. However, journalism has been negatively affected by de-professionalization which was doubly related to the rise of social media platforms. On the one hand citizens gained a role in producing news, on the other, institutionalized media were economically squeezed by the platforms and reduced their news producing activities.⁶ A long history of political control over media, especially the public service broadcaster, is also seen as a negative trend (Bilić et al., 2021).

The Croatian media system has been described as having many traits of a polarized-pluralist Mediterranean system described by Hallin and Mancini (2004), with higher historical political polarization, an elite oriented press at the time of its establishment and a later introduction of the mass media, with lower journalism autonomy and higher political parallelism (Peruško, 2012, 2013). In comparative studies based on the empirical operationalization of the Hallin and Mancini (2004) model Croatia clusters with south European countries (Greece, Italy, Spain), as well as with some post-socialist countries (Lithuania, Hungary, Bulgaria, Romania) in a peripheral European media system (Peruško et al., 2013; Peruško, 2016). In a different empirical operationalization of the Hallin and Mancini (2004) model and including only CEE countries, Croatia groups with Czech Republic, Poland, and Slovenia in the Central European media system model (Castro Herrero et al., 2017). When the digital media systems dimensions are included together with the dimensions of political system of inclusiveness and globalization, all CEE countries, including Croatia, form one media system cluster (Peruško et al., 2015).

1.1. Critical Junctures: Social and Political Change

Social and political change in Croatia can best be understood by examining the rhythm of critical junctures and path dependencies that followed. Critical junctures are those times in history when the social and political equilibrium is shaken, punctured, and the future developments can more easily sway from the previous development path. Particularly developed within the theory of historical institutionalism (Moore, 1966; Mahoney, 2001; historical institutionalism was employed for the analysis of media systems in Peruško, 2013, 2016; Peruško et al., 2021; and an overview for communication studies in Bannerman and Haggart, 2015), the notion that social change is not linear sits well with other contemporary theories of processual approach to change (see Sztompka, 1993). The argument here is that these points in history, when the previous social order breaks down or is dramatically changed, in some way mark the future social development. It is our expectation that historical frequency of such interruptions in the path of development is responsible for more difficulties in the present-day democratic consolidations. One explanation of this assumption, if it proves to be correct, is that the path dependencies, i.e., social institutions including social values and practices from previous periods were sometimes carried over in the next period, without having a chance to transform. Thus, the volatility of the social field, brought about by frequent radical interruptions, may be behind the difficult consolidation of democracy, and might also reflect to the four dimensions we expect to link to the quality of deliberative communication – the dimension of journalism, the legal context, media usage patterns of audiences, and media related competencies of users and producers.

⁵ The data are from the period preceding the war on Ukraine, as well as the inflation in Europe in the second part of the 2022.

⁶ Tomislav Wruss (October 2022, contribution in interview).

While in political and social theory these critical junctures are mostly analyzed in relation to political change and revolutions, it is equally important to consider other internal or external crises or developments that bring about (or have the potential to bring about) radical social change.

1.1.1. *The Longue Durée*

Croatia is one such country where volatility and frequency of the *longue durée* change affects it even today. A recent study by Peruško et al. (2021) identifies three critical junctures and subsequent periods which are pertinent to the development of media systems in the post-Yugoslavian states in Southeast Europe, including Croatia: the bourgeois revolution, the socialist revolution, and the democratic revolution. The first critical juncture introduced the long period leading to modernity of Croatia as a peripheral part of the Habsburg empire, then as part of the south-Slavic state following the dissolution of the monarchy in WWI and the creation of the Kingdom of Yugoslavia. WWII enabled the second critical juncture and marks the start of the socialist period, which lasted until 1989 when the third wave of democratizations in CEE following the collapse of the Soviet Union presented a common critical juncture for CEE countries. The transformations of the political, social, and cultural / symbolic fields (in which the media eventually developed) during these three periods are, to a smaller or greater degree, included in the shape of the media system.

The study also argues for the importance of including multiple communication revolutions which have influenced the structures and practices, as well as values and expectations, of communication since the invention of the printing press, or the telegraph, which is, according to Anthony Giddens (2012), the moment when modernity began. Thus, each historical period is particularly linked to specific types of media, but their structures and practices differ according to the historical paths. This is exactly one of the aims of the “*MEDIADELCOM*” project – to see how a different age plays differently in various media system contexts, and especially in relation to deliberative communication.

Peruško et al. (2021) applied a set-theoretical research approach using a fuzzy set qualitative comparative analysis (fsQCA) (Ragin, 2008) with the conditions coming from three temporal frameworks and three fields of power – the political field, the socio-economic field, and the cultural-symbolic field – alongside several adapted dimensions that are familiar from the mainstream media systems theory (i.e., Hallin & Mancini, 2004). Their study shows that among the six post-Yugoslav states (Slovenia, Croatia, Bosnia and Herzegovina, Serbia, Montenegro, and Macedonia), Croatia took one of the two paths to a free media system in contemporary times. Both paths have very similar conditions in the first two temporal frameworks (modernization and socialism), as peripheral parts of the Habsburg Monarchy, with early introduction of book printing, early introduction of political elite newspapers, more pluralism and autonomy of the cultural and media scene during socialism than the other Yugoslav republics.

In the last period, the first decade of the transition, the 1990s, was separately analyzed in terms of the difficulty of the transition. Croatia had a difficult transition with war in its territory as well as a semi-authoritarian president, but had successfully consolidated democracy, with a sufficient score of liberal democracy and the resolved stateness issue (Peruško et al., 2021). Further analysis showed that in Croatia the development of acceptable levels of media freedom resulted from the remote path of strong markets and consolidated institutions in the three-time frames, a developed media market in the third temporal framework (after 1990), and a policy actively implementing media pluralism and digital infrastructure. Croatia also had necessary levels of conditions necessary for media freedom in the last period: consolidated liberal democracy, the resolved stateness issue, European integration (EU member since 2013), economic development, state support for digital infrastructure, and a lack of media capture in comparison

to other SEE media systems. The set of necessary conditions that contributed to low media freedom (in Serbia, Bosnia and Herzegovina, Montenegro, and Macedonia) included “clientelism, a non-cooperative transition, weak post-materialist values, asymmetric pluralism, and higher media capture” (Peruško et al., 2021, p. 235).

1.1.2. 2000–2020 Period

While the three periods following critical junctures in the *longue durée* of several steps of system changes explain differences between a set of SEE media systems and explain the path of the development of the Croatian media system, we need here to take a step further and identify those turning points, or critical junctures, that have shaped the four critical media system areas of risks and opportunities for deliberative communication. These four dimensions – journalism, the legal framework of freedom of expression and information, media usage patterns of audiences, and media related competencies of media producers and users – have also reacted to various critical stimuli in the past 20 years.

The causes for the loss of equilibrium come from many fields – political, economic, and the field of communication, among others. The causes can be internal or external and can include matters that act disruptively on societies across the globe, like the present COVID-19 pandemic. Or the causes for change can be local and present in only one country. However, it is to be expected that there will be similarities in the types of causes that enable positive change. Critical junctures are neutral in this way, they are just the times when change is more possible than at other times, when purposeful agency is more effective, but whether the change really happens, and whether it brings an improvement or not, depends on a particular contingent context.

Robert McChesney’s definition of critical junctures in media and communication rests on the coexistence of three events: “1) There is a revolutionary new communication technology that undermines the existing system; 2) the content of the media system, especially the journalism, is increasingly discredited and seen as illegitimate; and 3) there is a major political crisis in which the existing order is no longer working and there are major movements for social reform” (McChesney, 2007, pp. 1433–1434). According to this definition, we are globally amid a communication critical juncture. The challenge of the “*MEDIADELCOM*” project is to understand how have this and other critical junctures in the past 20 years shaped the four dimensions of risks and opportunities that, as argued in the project proposal, influence deliberative communication in the 14 countries that are part of the comparative analysis. The identification of path configurations to deliberative democracy and the related critical junctures will be the task of the WP 3.1 where the fsQCA calibrations will be performed based on research in Case study 2 (WP 2.2).

1.2. Political Junctures

The first multi-party democratic election in May 1990 and the declaration of independence from the SFR Yugoslavia in 1991 were the first critical points in the media transformation process in Croatia as they marked the beginning of transition towards the adoption of democratic principles, including the fundamental right of freedom of expression. New laws were introduced in the field of public information and public communication, which, in some cases, were not completely new, but rather a hybrid of the old socialist laws and the newly accepted democratic values (Peruško Čulek, 2003; Jergović, 2003). The overall process of democratizing the media and public information system was slow due to the war situation, but also the political reluctance of those in power (Peruško et al., 2011; Bilić, 2012). That first period was dominated by the state-building process (Peruško Čulek, 2003; Bilić, 2012) and in the media, the protection of dignity, privacy, and reputation took precedence over the public’s right to information (Jergović, 2003; Bilić, 2012, based on Peruško Čulek, 1999). Freedom of expression was loudly appreciated, but in practice the political field sought to retain many controls over media. The media were

still understood by the ruling polity to be part of the state apparatus (Peruško Čulek, 1999; Peruško et al., 2011). The opposing view to this “state building normative media policy” came into play in 2000, when the change of political direction enabled the “pluralist normative media policy” to gain primacy (Peruško Čulek, 1999).

After a difficult first decade of its post-socialist transition, Croatia’s democratic trajectory took off in 2000 and enabled the country to join the EU in 2013⁷. The level of democratic consolidation is still low in certain areas (especially regarding democratic culture – according to the Economist Intelligence Unit Democracy Index, from 2020, the country is a flawed democracy (6,5) and political culture has the lowest value (4,38) (EIU, 2021). After receiving lower scores on international freedom of expression indexes than most post-socialist EU members, the latest Reporters Without Borders World Press Freedom Ranking in 2022 ranks it as 48 (increase from 56 the previous year, RSF, 2022).

The second political critical juncture came with the 2000 parliamentary elections. It was the first change of the party leading the government: a large center-left coalition led by the Social Democratic Party (SDP) defeated the Croatian Democratic Union (HDZ), which had led every government since the first democratic elections in 1990. This was followed by the change of the political system from semi-presidential to parliamentary (Peruško et al., 2011), and by significant democratic changes in the media policy and practice (Peruško et al., 2011; Peruško, 2012).

After 2000, Croatia was on a path of democratic consolidation. In this period, the HDZ was transforming into a more moderate conservative party ready to cooperate with ICTY in prosecuting war crimes and with a clear pro-European orientation. Conservative HDZ won elections again in 2003 and 2007. The conservative government rule was marked by various corruption scandals and the center-left coalition led by SDP won the 2011 election. Conservative coalitions led by HDZ won all subsequent elections (2015, 2016, and 2020).

Croatian political system was thus since 2000 characterized by the rule of two major traditional type parties and their coalition partners (Peruško, 2012). This model was not challenged until the rise of new populist parties which base their rhetoric on the “anti-establishment” sentiment mainly aimed against the two major parties. This was especially visible in parliamentary elections in 2015 and 2016 when populist anti-establishment parties gained seats in parliament. In 2015, under a new leadership of HDZ more in line with the radical right, the right-wing Patriotic coalition won elections and ruled in coalition with the populist party Most. The rule was short-lived due to conflicts in the coalition, and HDZ returned to power with more traditional type of coalition partners so that Croatia escaped the right-wing populist democratic backslide that happened in some of its neighboring countries.

The lack of political will can be seen as the main reason for the persisting negative aspects of the media system – for creating a framework for truly independent public service media.⁸

1.3. Legislative Changes / Turning Points

Three main phases in the post-socialist media policy in CEE are also discernible in Croatia „ 1) De-linking the media from the state; 2) Media market development – including privatization of media companies, creation of new ones, and foreign investments in the media; and 3) EU harmonization“ (Peruško, 2021a, p. 181). The fact is that there were only sporadic media policy texts and goals adopted in Croatia in the past 30 years, and that the legal framework changed frequently, in some instances every year, points to the lack of a comprehensive policy and rather

⁷ Antonija Čuvalo notes the EU integration as the impetus for legislative harmonization also in the media field. (November 2022, contribution in interview).

⁸ Maja Sever (October 2022, contribution in interview).

haphazard shaping of the media field.⁹ This signals a time of volatility, and points to conclusion that the media system has not yet been stabilized. Within this broader context of constant change, we can point to the legal dimension of ROs as being the source of the majority of turning points in other areas of the media system,¹⁰ in relation to all the key issues analyzed in this study.

Legislative changes are always linked to the political will, expressed in the electoral winners' views and goals, so we need to also look at the political undercurrents or background to various changes.

The coalition of HDZ and a populist party in the 2015 government (which lasted less than a year) had a very negative impact on media with "social and political pressures towards the media regulator and an unfavorable policy towards the community, minority and non-profit media" (Bilić et al., 2017, p. 2). Maja Sever also points to this change in media policy which resulted in the closure of many non-profit media.¹¹

In Croatia, editorial policies of PSM usually change after the change of government. With the liberalization and democratic consolidation of the 2000s, the PSB Croatian Radiotelevision (HRT) was organized as a "public institution" that "promotes the interests of the public" and "responds to the public interest" (Bilić, 2012, p. 830), starting its transformation from state to public service broadcaster (Peruško & Čuvalo, 2014). The liberalization of the audio-visual media market also took place, with the first commercial televisions at the national level, Nova TV and RTL starting broadcasting in 2000 and 2004 respectively (Peruško & Čuvalo, 2014).

Retrograde political influence was especially pronounced following 2015 elections when "dozens of editors and journalists were dismissed immediately following parliamentary elections" (Bilić et al., 2017, p. 6). This was shown to be a short-term political instability, however, the "populist turn" and illiberal tendencies produced longer-term consequences in the form of "an increased number of legal actions against journalists and the media for 'shaming' and slander, brought by persons in political power or related to them; an increased pressure on the independent editorial and journalistic practices of the public service broadcaster, HRT, with a sharp ideological turn to the right; an unrelenting policy of non-support to the civic sector media, and pressures from the state and non-state actors on new forms of speech in the digital sphere and in the legacy media"¹² (Peruško, 2020). This is also noted in the media market, as analysis of media polarization found an expansion of media outlets on the right (Vozab & Peruško, 2021).

Another key juncture in the legal domain is the country's accession to the EU: from obtaining a candidate status in 2004, to full membership in 2013. The corpus of media legislation has changed since 2000 to further align media legislation with European standards (Badrov, 2007; Peruško et al., 2011; Bilić, 2012; Bilić & Švob-Đokić, 2016). Negotiations in Chapter 10 – Information Society and Media were completed in June 2011, following harmonization of the country's media and communication laws, first with the Television Without Frontiers Directive, and then the Audiovisual Media Services Directive (Bilić, 2012).

1.4. Economic Junctures

After strong economic downturn and isolation in the 1990s, in 2000s Croatia experienced economic growth and stability which lasted until the 2008 economic crisis. A first critical juncture

⁹ This is also observed by Igor Kanižaj and Davor Mezulić (October 2022, contribution in interviews).

¹⁰ Davor Mezulić notes that changes instigated by media laws were more often of a personal, and not substantial nature. Vanja Jurić also thinks that the changes to specific media laws did not substantially change their direction in the past 20 years (October 2022, contribution in interviews).

¹¹ October 2022, contribution in interview.

¹² Several interviewed experts pointed to the increased political dependence of the HRT.

is certainly the introduction of capitalism in 1990, with privatization of (print) media outlets and the possibility to start private media companies. The liberalization of the media market in early 2000s was the first media specific juncture which opened the path for new commercial television channels and foreign owners to invest in the media sector in Croatia. In the Southeast Europe the foreign investment in the media market developed later in comparison to post-socialist Central European states, where foreign investors entered the media market in the 1990's (Štetka, 2012, p. 436). The press market was liberalized sooner in CEE with weak regulation, which resulted with "a 'wild' privatization of the press enterprises" (Peruško & Popović, 2008b, p. 170). In Croatia, foreign ownership was restricted by regulation in the 1990s so foreign investors came to the market after 2000 (Peruško et al., 2021, p. 173).¹³

The global crisis of 2008 also played an important role on the Croatian media market, increasing the downturn of the printed press. The recession followed with a high unemployment rate which was also felt in journalism.¹⁴ The position of journalists was especially vulnerable, with increased layoffs, wage cuts and even more precarious position of freelancers across all media sectors (see detailed description under the Journalism domain).

Croatian economy has a large share of tertiary sector, and a strong reliance on tourism which makes it less resilient to different shocks to economy. The COVID-19 pandemic hit Croatian economy rather hard, and GDP decline of -8,4 % was one of the strongest in Europe, but the recovery was very quick and the GDP in 2021 reached 67,84 billion (US\$), still short of its pre-2008 position (World Bank, 2022). The effect of declining printed press after the 2008 crisis was continued by the COVID-19 pandemic,¹⁵ which similarly shaped the print media market and strengthened the switch to the digital media and the growth of new media platforms and services as increasingly important sources of news and other media content. Although media companies received government subsidies during the COVID-19 pandemic, wages for journalists were still cut (see detailed description in the Journalism domain).

1.5. Communication Junctures

Policy response to digital transformation was slow, and mostly directed towards the liberalization of the telecommunication system, with "some support and investment in infrastructure, mainly broadband development" (Peruško & Popović, 2008b). Croatia switched to digital TV transmission in 2010, before the deadline set by the European Commission (the deadline of year 2012 was set for EU member states, Milosavljević & Broughton Micova, 2013). Croatian market profited from the digital television switchover as this helped new DVB-T and IPTV channels to be introduced (Andrijašević & Car, 2013). Shortly after the digital switchover, six new DVB-T channels were opened, five IPTV channels were operating until 2013, and by that time there was 20 cable operators in Croatia (Andrijašević & Car, 2013). After the digital switchover, Croatian PSB HRT opened two new specialized channels – HRT 3 (culture and education), and HRT 4 (24-hour news and information programs). One of the consequences of the digital transformation is that the print media market is consistently falling in Croatia and broadcast and digital media are primary sources of news (Peruško, 2019; Vozab, 2014). Media markets in post-socialist Europe are clearly television-centric and television still holds a high place despite the digital transformation. Wruss (in interview, October 2022) finds the combined effect of the "changed media business, social contest and new audience habits" brings the destruction of the

¹³ Amendments of Telecommunication Act from 1999 opened a way to privatization of the third channel of state-owned television, while Electronic Media Act from 2003 regulated the broadcasting licensing and the obligations of media owners (Andrijašević & Car, 2013, p. 280).

¹⁴ Igor Kanižaj also stressed this (October 2022, contribution in interview).

¹⁵ 86,2 % of average issue readership does not read daily newspapers, Tomislav Wruss quotes the Ipsos / Mediapuls survey (October 2022, contribution in interview).

business model of printed newspapers, where publishers are now looking to find revenues in the digital realm.

Digital transformation changed the audience access to media content. In the digital era, the digital media market dimension becomes increasingly important as orientation of the media markets shift from print media to diversified digital and hybrid media (Mattoni & Ceccobelli, 2018; Peruško et al., 2015). This area of research is one of the most important for the future understanding of the relationship of the (hybrid) media system to deliberative democracy, especially in those countries in which the transition to democracy in 1990 was not successful or where consolidation has backslided (Peruško, 2021b).

Changes in communication technology and new audience and media affordances were highlighted as a key change in the Croatian media system by all the experts we interviewed. The similarities of the changes with those in other European countries were stressed, including the diminished importance of traditional media and especially printed newspapers, the rise of platforms and the changes in the public sphere with increased role of the citizens. The effects of the change will be discussed in more detail in the next sections of this chapter.

1.6. Assessment of Monitoring Capabilities

The MEDIADELCOM WP 2 TASK 2.1 (D 2.3) *“Croatia: Risks and Opportunities Related to Media and Journalism Studies (2000–2020)”* presented an overview of published literature and other data sources in Croatia in the four domains that are seen as presenting risks or opportunities for deliberative communication: Journalism, Legal and ethical, Media usage, and Media-related competencies domain. The report was based on published studies (national and international) and reports, and gives a thorough insight into the breadth and depth of existing research and information in the four dimensions. The report also included an analysis of research resources: expertise, financing and position of research and data collecting units, with the aim of assessing the quality of research and the institutionalization of the academic discipline(s) necessary for their study.

While many articles are published in six academic journals dedicated to media and communication, as well as in other academic journals, books, and reports, we attempted to only include those of sound reliability of data and approaches. This has limited the number of useful publications but has hopefully improved the accuracy and the validity of our report. The largest number of sources was found in the domain of Journalism, followed by the Legal and ethical domain. The least numerous sources are in the Media-related competencies domain, especially pertaining to audience competencies, while audiences’ usage patterns are more thoroughly covered. The last two domains are significantly present only after 2011.

In addition to an uneven distribution of research in different domains, we also found an uneven distribution of expertise. The research capacity of the academia and NGOs in the field is solid, more pronounced in relation to legal issues, questions of media policy and media system transformation, journalism, and audiences, with a smaller extent of expertise related to media related competencies. The number of research teams is rather small; many researchers work alone and not as part of research teams, and this limits the overall development of the discipline and its potential impact. The promotion of research results by research teams or institutions is also not prominent and the public, as well as the policymakers, may not be aware of some significant research findings.

Additionally, the study highlighted a limited capacity of the relevant government media policy bodies (i.e., the Ministry of Culture and Media) to engage with research evidence¹⁶ with a view to limiting risks and enhancing opportunities for deliberative communication.

2. Risks and Opportunities in the Legal and Ethical Domain

2.1. Development and Agency of Change

The critical turning points in the Legal and ethical domain are a result of the combination of internal democratization processes with external benchmarks set in the process of Croatia's accession to the EU, as well as the earlier harmonization with the Council of Europe media and freedom of expression frameworks. In both cases, political actors have played the key role in setting both the legal and practical conditions for exercising freedom of expression and access to information. An important role has also been played by the civil society organizations particularly in early 2000s, when Croatia had seen the first change of the leading party in government and when the process of democratic consolidation truly started. The process of adopting and implementing EU aligned legislative framework for media freedom and access to information has also spawned new or transformed institutions in this area, which have yet to establish their full independence from political influences. One of the risks in the democratization and media transformation efforts of post-socialist countries is the adoption of the outward reform structures without their internal values, leading to fragility of new institutions (which enables backsliding) or to the lack of success of reforms. The positive role was played by the Croatian Constitutional Court by its implementation of the European Court of Human Rights decisions and standards in freedom of expression, which has transformed the adjudication of defamation to give more importance to a legitimate public need regarding certain incriminated information.¹⁷ Decisions of the European Court of Human Rights have also been instrumental in changes in the Legal and ethical domain in Croatia, where the responsibility of the publisher (in some circumstances) was included in the revised Electronic Media Act.¹⁸

2.2. Freedom of Expression

Legal environment. In Croatia, freedom of expression is one of the basic constitutional rights and freedoms. Article 38 of the Constitution of the Republic of Croatia (NN 56/90, 135/97, 08/98, 113/00, 124/00, 28/01, 41/01, 55/01, 76/10, 85/10, 05/14) guarantees freedom of thought and expression, which, as set by the second paragraph, includes freedom of the press and other media, freedom of speech and public opinion, and free establishment of all institutions of public communication. The same Article in paragraph 3 forbids censorship and grants journalists the right to freedom of reporting and access to information. The Media Act (Article 3, NN 59/04, 84/11, 81/13), which is a fundamental regulation of Croatian media law, and the Electronic Media Act (Article 4 in the new law, NN 111/21; and Article 3 in the law that was in force 2009–2021), both contain specific provisions protecting freedom of expression and freedom of the media. In the relevant legislation, no explicit differentiation is made between freedom of expression online and offline, suggesting that equal rules should apply to all media.

Necessity & legitimacy of restrictions. The Constitution also prescribes restrictions on freedom of expression in accordance with the provisions of the European Convention on Human Rights and its interpretations, which have been generated by the case law of the European Court of Human

¹⁶ This is also noted by Davor Mezulić (October 2022, contribution in interview).

¹⁷ Vesna Alaburić (October 2022, contribution in interview).

¹⁸ The ECHR decision is *Delfi v. Estonia*. Vanja Jurić (October 2022, contribution in interview).

Rights (Mijić Vulinović, 2021). The Constitution prohibits any incitement to war or violence, to national, racial, or religious hatred, or to any other form of intolerance (Article 39), as well as it declares (Article 16) the protection of the freedoms and rights of other people, the legal order, public morals, and health as legitimate grounds for possible, but proportionate legal restrictions on rights and freedoms.

The Media Act (Article 3, paragraph 3) defines the conditions in which limitations to media freedom are acceptable “only when and to the extent necessary in a democratic society in the interest of national security, territorial integrity or public peace and order, prevention of disorder or criminal acts, protection of health and morality, protection of the reputation or rights of others, prevention of disclosing confidential information or for the purpose of preserving the authority and impartiality of the judiciary solely in a manner stipulated by law”.

Scholarly and expert debate have mostly focused on limitations to freedom of expression imposed by the protection of the right to privacy, honor and reputation, and against hate speech. In the political system that the country was part of before independence in the early 1990s, the legislation respected the reputation of state bodies and officials by protecting them from critical judgment and dissent (Jergović, 2003). During the early democratic transition period, in its 1997 version, the Criminal Code foresaw *ex officio* prosecutions for alleged defamation committed against public officials (Jergović, 2003; Badrov, 2007). This provision was repealed by a decision of the Croatian Constitutional Court in 2000, as unconstitutional, but it reflects the early struggles in democratizing conditions for freedom of expression in the country (Badrov, 2007).

In 2011, Croatia adopted a new Criminal Code (NN 125/11, 144/12, 56/15, 61/15, 101/17, 118/18) which entered into force with the beginning of 2013 to meet the standards required at the time for the country to join the EU (Maršavelski & Juras, 2019). The adoption of this law is sometimes described as the “[c]omplete criminal justice reform in respect of offenses against honor and reputation” (Božić, 2019, p. 591), as it abolished two earlier criminal offenses against honor and reputation: revealing personal or family circumstances (Article 202 in the 1997 Criminal Code), and reproaching a criminal offense (Article 203 in the 1997 Criminal Code), and introduced a new one – shaming (Article 148 in the 2011 Criminal Code) as the most problematic legal aspects in the decade of the 2010.

The 2011 Criminal Code recognized three specific offenses against honour and reputation: *insult* (Article 147), *shaming* (Article 148), and *defamation* (Article 149). The law faced several amendments due to perceived problems in practice, and the need for additional harmonization with the EU *acquis* and international documents (Maršavelski & Juras, 2019; Božić, 2019). The shaming offence was particularly problematized. The 2015 amendments to the Criminal Code (NN 56/15) renamed the offense in grave shaming, and then it was removed from the Criminal Code in 2019 (NN 126/19). This crime, before abolishment in 2019, was loudly criticized by journalists, and to a lesser extent also within academia (see, for example, Derenčinović, 2015). In their critical analysis of the fifth amendments to the Criminal Code, Maršavelski and Juras (2019) put forward that the proposer of the deletion; Ministry of Justice, justified this by a small number of criminal proceedings initiated for this criminal offense, with most resulting in acquittals, and because the comparative analysis showed that “shaming” is unknown in most EU member states (Maršavelski & Juras, 2019).

The state has not decriminalized defamation. The issue is continuously and widely discussed in both academic and professional literature, starting from the fact that it is a delicate area with potentially detrimental implications for the protection of freedom of expression (Badrov, 2007). In Croatia, there have been numerous amendments to the Criminal Code, especially concerning journalistic defamation (Badrov, 2007; Maršavelski & Juras, 2019; Božić, 2019, 2020). The 2006 amendments (NN 71/06) to the 1997 Criminal Code abolished imprisonment as a sanction for

defamation. Even though jail sentences were never carried out, there were several impositions of a prison sentence, albeit suspended (Peruško, 2011).

Adequacy of legal defence. The burden of proving the untruthfulness of the allegation, as well as that the perpetrator had knowledge that the allegation is untrue, lies with the plaintiff (Novoselec, 2016). This circumstance, claims Novoselec (2016), makes it more difficult to convict for defamation. In case of the insult, proof of truth does not absolve from liability for the insult arising from the manner of expression (Novoselec, 2016).

Following the 2015 amendments to the Criminal Code, the exclusion of unlawfulness is available for insult (and was available also for grave shaming before it ceased to exist as a criminal offense in 2019), if the perpetrator acted “in a scientific, professional, literary, artistic work or public information, in the performance of duties prescribed by law, political or other public or social activity, journalistic work or defense of a rights, and it has done so in the public interest or for other justified reasons” (Article 148a).

According to the Media Act, the publisher shall not be liable for the damage if the information which caused the damage is (Article 21, paragraph 4), among others, based on truthful facts or facts for which the author had justified reason to believe that they were truthful and he undertook all necessary measures to verify their truthfulness, while there was a justified interest on the part of the public for the publishing of that information, and if the activity was undertaken in good faith. The Act stipulates that the existence of liability shall be proven by the plaintiff, while the existence of preconditions for the release from liability for damage shall be proven by the defendant (Article 21, paragraph 6).

The tension between protecting privacy and ensuring freedom of expression has often been discussed by legal scholars in the country (see Alaburić, 2000; Derenčinović, 2015; Maršavelski & Juras, 2019; Božić, 2019; Mijić Vulinović, 2021). The “legitimate public interest” is recognized as the criterion for determining the limit of freedom of expression versus the right to respect for privacy (Mijić Vulinović, 2021). Politicians and other public persons who themselves attract public attention are required to demonstrate a greater degree of tolerance (Mijić Vulinović, 2021). This was not the case earlier when the 1997 Criminal Code did not distinguish between public and private persons, nor did it consider the truthfulness of the disputed claim (Jergović, 2003).

Protection of journalist’s freedom. While in the last two decades there are “generally no incidents of blatant intrusion such as outright state censorship or media shutdowns” (BTI, 2016, p. 8), experts and scholars continuously document and report on violations of journalistic freedom of expression (see Jergović, 2003; Bilić, 2020). The public service media HRT is perceived as controlled by the government and is criticized for censoring its own journalists (BTI, 2016).

Since the country’s independence there has been an increase in lawsuits and defamation charges against journalists raised by politicians, businessmen, and other public figures (Badrov, 2007; Skoko & Bajs, 2007; Bilić, 2020). In recent years this practice has been categorized and observed as strategic lawsuits against public participation (SLAPPs), which pose a serious threat to journalism and media freedom. In 2019, more than 1 000 were directed towards journalists by politicians and other public figures, with some of the lawsuits initiated by the HRT against its own journalists. This was also emphasized in the Ad-hoc study for the European Commission (Bárd et al., 2020), which highlighted that the generally high number of lawsuits against journalists supports the assumption that SLAPP has become a systemic problem which negatively impacts media freedom in Croatia.

In addition, there have been reported cases of excessive and unnecessary police actions against digital news media journalists investigating local politicians. Police also detained and brought to

the misdemeanor court a journalist regarding his satirical tweets, where he was found guilty of insulting the police (Bárd et al., 2020).

In recent years, another topic came into spotlight. The line between freedom of expression and hate speech, especially in the online context, has become a much-debated topic in the country, with a general attitude towards imposing regulation of hate speech online (Bilić et al., 2017; Roksandić Vidlička & Mamić, 2018). No such concrete measures, policy or legal actions have been adopted to ban hate speech in (social) media by 2020 (Bilić, 2020). In the Croatian legal system hate speech is criminalized through several provisions. However, as pointed out by Munivrana Vajda and Šurina Marton (2016) none of them is called “hate speech” (p. 441); the term is not approached in its entirety, and the criminality is prescribed for only some of its manifestations.

The new 2021 Electronic Media Act (Article 14, paragraph 2) prohibits in audio and / or audio-visual media services any encouragement or promotion of hatred or discrimination based on race or ethnic origin or color, sex, language, religion, political or other belief, national or social origin, property status, membership in trade union, education, social status, marital or family status, age, health, disability, genetic heritage, gender identity, expression or external orientation, as well as anti-Semitism and xenophobia, ideas of fascist, Nazi, communist and other totalitarian regimes. As per the Article 94 paragraph 2, providers of electronic publications are obliged to take all measures to prevent the publication of content that incites violence or hatred. Similar applies to video sharing platforms (Article 96) that are obliged to take appropriate measures to protect the general public from the videos generated by users and audio-visual commercial communications that contain incitement to violence or hatred against a group of persons or a member of a group. However, the provision is very broad and does not contain further details on such measures and their implementation.

The country has not adopted any new legislation to counter disinformation. The publication and dissemination of false news is mentioned only in the Act on Misdemeanors against Public Order and Peace (NN 5/90, 30/90, 47/90, 29/94) which states that “who invents or spreads false news, which disturbs the peace and tranquility of citizens, will be punished for the offense by a fine from 50 to 200 DEM in the equivalent of domestic currency or imprisonment for up to 30 days” (Article 16). The law prescribing this offense, with minor changes, has been in force since 1977, and it still prescribes fines in the former monetary unit of Germany. Unlike with most misdemeanors and criminal offenses, here it is the defendant who must prove the truth of the stated claims and not the prosecutor (Pravna klinika, 2020). This offense can be committed through negligence, so it is not necessary to determine the intent, i.e., it does not matter whether the perpetrator was aware of the characteristics of the claim, but only that the defendant spread false news, or that his behavior allowed it to reach more people (Pravna klinika, 2020). There is no indication that this has been used on journalists regarding disinformation / fake news.

Some legal scholars in the country have suggested that Croatia should consider the possibilities to hold online platforms (such as social media) responsible for harmful and illegal content published and shared on their services, in line with Germany’s Network Enforcement Act (NetzDG) which obliges the large platforms to remove content that appears manifestly illegal within 24 hours of having been alerted of it (see Roksandić Vidlička & Mamić, 2018).

The new Electronic Media Act steps into that direction as it obliges providers of video sharing platforms to take appropriate measures regarding the protection of the public from the program – videos generated by users and audio-visual commercial communications that contain incitement to violence or hatred against a group of persons or a member of a group (Article 96). However, the provision is very broad and does not contain further details on such measures and their implementation.

Following the adoption of the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), Croatia has adopted the Act on the Implementation of the General Data Protection Regulation (NN 42/18). However, the country did not impose limits with regards to data retention that would prevent illegal monitoring of journalists by law enforcement authorities (Bilić, 2020), neither did it adopt legislation to reconcile the right to the protection of personal data with the right to freedom of expression and information, including processing for journalistic purposes.

The Act on the Implementation of the GDPR contains no specific provisions on data processing for journalistic purposes. No scientific literature has been found on this topic in the country. However, the prominent media lawyer Vesna Alaburić in an interview given to the *Global* newspaper highlighted the fact that Croatia failed to enact the possibility to exempt those who exercise their freedom of expression for “journalistic purposes” from specific GDPR rules and obligations, which resulted in the Personal Data Protection Agency (AZOP) (<https://azop.hr>) applying the GDPR in journalism in more or less the same way as in all other situations of actual processing of personal data (Grbavac, 2020). This lack of consideration of the public interest in journalistic processing of personal data, warned Alaburić, sometimes results in the AZOP asking a publisher to delete parts of the texts published, with the lawsuit having no suspensive effect, and litigation going on for years.¹⁹

The new Copyright and Related Rights Act (NN 111/21) entered into force on 22 October 2021. One of the main reasons for adopting the law was the transposition of the EU Copyright Directive (Directive (EU) 2019/790). The law allows for the use of copyrighted works for the purpose of informing the public (Article 201), with adequate reference to the source and authorship of the work. The provision is in line with the previous Copyright and Related Rights Act (NN 167/03, 79/07, 80/11, 141/13, 127/14, 62/17, 96/16). No literature has been found on whether journalists in Croatia enjoy effective protection from copyright laws.

2.3. Freedom of Information

The protection of the right to information is recognized in the Constitution and national laws. Access to public information is seen as an integral part of freedom of expression and a constitutional right since the 2010 (amendments to the Constitution). Article 38, which guarantees freedom of expression, also guarantees the right of access to information held by public authorities, stipulating that any restriction of this right must be proportionate and carefully accessed in each individual case, necessary in a free and democratic society, and prescribed by law. In the same Article, the Constitution specifically guarantees journalists the right to freedom of reporting and access to information. Journalists have a special legal position in accessing public sector information within the framework of Croatian legislation due to their special role in the democratic society – as professional information seekers (Rajko, 2012).

In the Media Act (Article 3) accessibility to public information is considered an integral part of media freedom. The Act stipulates that “bodies of executive, legislative and judiciary power and bodies of local and regional self-government units, as well as other legal and natural persons who perform public service and / or duty, shall be obliged to provide accurate, complete and timely information on issues from their scope of activity” (Article 6, paragraph 1), and especially to journalists (Article 6, paragraph 2). The public institutions are obliged to determine a person who shall ensure access to public information (Article 6, paragraph 3), do so “in an appropriate time framework” and be accountable for the accuracy of the information provided (Article 6,

¹⁹ Vanja Jurić also notes that GPDR is often (mis)used by various institutions to evade answering journalists requests for information (October 2022, contribution in interview).

paragraph 4). The Act also stipulates fines for the authorized person in a body or legal person who denies a journalist information (Article 62, paragraph 1).

Croatia has the Act on the Right of Access to Information (NN 25/13, 85/15). The specific Act on access to information was first adopted in 2003, providing more precision around the timeframes and procedures to ensure access to information (Peruško, 2011). However, the implementation of that Act was facing some shortcomings detected through monitoring by civil society organizations (Peruško, 2011). In 2013 Croatian Parliament adopted a new Act, which laid down the right to access to information and re-use of information held by public authority bodies; as well as the principles, restrictions, and procedures for achieving the access; but the biggest novelty was the introduction of the Information Commissioner, an independent government body for protection of the right of access to information and re-use of information (NN 25/13). The Commissioner has a mandate to protect, monitor and promote the right of access to information and the right to the re-use of information (Article 35), with broad formal powers, such as appellate procedure, investigation, and sanctioning (Musa, 2019).

As per the Act on the Right of Access to Information, the public authority body must respond to the request for access to information within 15 days from the date of submission (Article 20). The deadlines for exercising the right of access to information may be extended by additional 15 days: 1) if the information must be sought outside the seat of the public authority body; 2) if the request pertains to numerous different information; 3) if this is necessary to ensure the accuracy and integrity of the requested information; 4) if the situation requires conducting the Proportionality Test and the Public Interest Test (Article 22).

The development of legal and institutional setting for ensuring the right of access to information through three stages “driven by the process of Europeanization in the field of public administration, democratization, the human rights development, and the fight against corruption, as well as the introduction of e-government, with a significant role held by civil society” (Musa, 2019, p. 340). The three stages are: (1) “the nascent phase (2003–2010)”, starting with the adoption of the first RTI law in 2003, but which lacked the institutional support for enforcement; (2) “the adolescent or intermediate phase (2011–2013)”, related to the constitutional protection of access to public information, and improvements of the RTI regime, in particular by designating the appeal procedure to an independent institution – the Personal Data Protection Agency; (3) “the mature phase”, which began in 2013 when the new law was adopted, including the Public Interest Test, better procedural safeguards, and a new, specialized independent body for the protection, monitoring, and promotion of the RTI (Musa, 2019, pp. 341–342).

The number of complaints filed to the Information Commissioner when access to information was denied in the period from 2011 to 2014 increased, showing a growing awareness of citizens about the right to access information (Vajda Halak et al., 2016).

Legitimacy of restrictions on freedom of information. In general, the (un)availability of public sector information in Croatia is regulated by a set of regulations that are not always harmonized with each other (Rajko, 2007, 2012), but are generally defined in accordance with international standards (Bilić et al., 2017).

The Constitution guarantees the security and confidentiality of personal data (Article 37). As an EU member state, Croatia has also transposed and implemented the GDPR. There is the Data Secrecy Act (NN 79/07, 86/12), and the Media Act stipulates the grounds for withholding of public information.

Both the right of access to public information (Article 38) and the right to the protection of personal data (Article 37) are constitutional categories. Following the adoption of GDPR, Croatia has adopted the Act on the Implementation of the General Data Protection Regulation. The country also has the Act on the Right of Access to Information, which is considered of great

importance in terms of the overall social development of the Croatia as a democratic social and legal state (Boban, 2012).²⁰

In the Media Act (Article 6) the provision of information may be withheld when: “the requested information have been defined, in the proper manner and for the purpose of protecting the public interest, as a state or military secret”; “the publishing would represent a violation of the confidentiality of personal data in compliance with the Act, unless their publication may prevent the execution of a severe criminal acts or immediate danger to the life of people and their property”. If the public information is withheld, a responsible person is obliged to explain in writing the reasons for withholding information within three working days from the day on which the written request for information was received. Furthermore, in case of withholding of public information, a journalist has the right to file a complaint with the competent court, which should decide on the complaint under a special law in the emergency procedure.

Article 15 of the Act on the Right of Access to Information lists acceptable restrictions to access to information: “if the information concerns an ongoing investigation by public authorities”; “if the information is labelled as classified”; “if the information is a business or professional secret”; “if the information is a tax secret”; “if the information is protected by personal data and privacy laws”; “if the information is being generated by public institutions and the publication might affect the decision making process”; “if it is limited by international treaties”; “if publication would affect the efficient, independent and unbiased court, administrative or other legal process”; “if it would affect the work of bodies performing supervision, inspection and monitoring of the legality of certain actions”; “if it would violate intellectual property rights without a written consent of the author or owner”.

The Data Secrecy Act provides for four different degrees of classified data secrecy: top secret, secret, confidential, and restricted (Articles 6, 7, 8 and 9). In Article 16, the Act stipulates that “when there is public interest, data owner shall determine the proportionality between the right for data access and protection of the values stipulated in Articles 6, 7, 8 and 9 of this Act, and decide on maintaining the degree of secrecy, changing the degree of secrecy, declassification or exemption from the obligation to keep data secret”.

Proportionality and Public Interest Tests are defined in the Act on the Right of Access to Information (Article 16). The public authority that conducts the test should determine whether access to information may be restricted to protect some protected interests stipulated by the same Act or whether access to requested information should be provided. If the public interest prevails over the protection of protected interests, the information will be available.

Journalists access to official documents. Scholars often warn that there is a general trend towards widespread disregard for respecting the legally defined and timely delivery of requested information (Peruško, 2011; Vajda Halak et al., 2016; Bilić et al., 2017; Bilić, 2020). Their assessments are based on monitoring by civil society organizations and on the regular reports by the Information Commissioner. The Commissioner continuously reports about some public bodies deliberately stalling or delaying access to information: most appeals submitted to the Commissioner are due to the silence of the administration and the share of such complaints is continuously growing (Povjerenik za informiranje, 2020). At the same time, over 60 % of public authority decisions are illegal, and requests are often rejected despite publicly available guidance from administrative and judicial practice that has set clear standards of conduct.

In 2020, according to the Commissioner’s report, personal data protection was the most used legal restriction, with a high 65,38% of illegal decisions denying information for this reason.

²⁰ As mentioned above, GDPR is often used by institutions to evade the Act on the Right of Access to Information, Vanja Jurić (October 2022, contribution in interview).

This referred to the availability of information on the distribution of public funds (names and surnames of beneficiaries and amounts paid), which is determined by the Act on the Right of Access to Information and confirmed by the case law of the High Administrative Court of the Republic of Croatia. Another common and long-standing practice of avoiding compliance with the established standards of public data access is the use of trade secrets as a protective mechanism for denying information (Povjerenik za informiranje, 2020). This was so widespread that in 2020 in more than 80 % of appeal cases the Commissioner determined that it was not a trade secret (e.g., various payments, salary data, etc.), but rather that it was a matter of managing public funds.

The protection of journalistic sources is explicitly recognized in Croatia. Article 30 of the Media Act explicitly protects journalistic sources: a journalist, as well as editors and authors of published content who are not journalists, are not obliged to reveal the source of information that is published, or one intends to publish. As per the same Article, the state attorney can, if necessary for the protection of national interests, territorial integrity and health, request from the court a demand to the journalist to reveal the source of information (to be) published; and the court can give such order to a journalist if it is necessary for the protection of public interests in particularly significant and serious circumstances when it has been indisputably established that there is no reasonable alternative measure and that a legally based public interest to reveal the source overcomes the interest in protecting the source.

The Code of Ethics of the Croatian Journalists' Association (HND) states in Article 5 that a journalist "has the right to hide the source, but that he or she holds responsibility for the published content".

There have been no major court cases, news reports, or NGO reports on the infringement of the protection of journalistic sources.

In 2019, the Croatian Parliament adopted the Act on the Right of Access to Information ("whistleblowers") (NN 17/19). Pursuant to this Act, reporting irregularities in business operations is not considered a breach of business secrets. The Act protects whistleblowers from subsequent unfavorable treatment such as termination of the employment contract, harassment, salary reduction, disabling promotion at work, changing of the work schedule, and similar. The Act recognizes internal and external irregularity reporting. In accordance with EU Directive 2019/1937 on the protection of persons who report breaches of EU law (known as EU Whistleblower Directive), the Act stipulates that applicant should first use the internal reporting procedure, where it exists, to give the employer the opportunity to rectify irregularities and only then external reporting or disclosure (Ombudswoman, 2021). All employers employing more than 50 people are obliged to provide a possibility for internal reporting of irregularities, appoint a confidential person for internal irregularity reporting if such person is proposed by at least 20 % of the employees, protect irregularity reporters from damaging acts, undertake measures to terminate irregularities, and keep the data received in the irregularity complaint confidential. This process should be known and available to all employees.

External whistleblowing (to the public ombudsman or to the public) is set as a second resort: if there are specific obstacles to internal reporting, if there is an imminent threat to life, health or security, or if there is a possibility of large-scale damages or the destruction of evidence. In Croatia, a competent public ombudsman is authorized for external irregularity reporting.

The first report from the Ombudswoman of the Republic of Croatia for 2019 states that there was little time to evaluate the implementation of the law which was in force for only six months in 2019. However, the report also states that there were several requests from institutions, employers, attorneys and citizens on the interpretation and application of the Act, the scope of implementation, definition of reporting irregularities, and so on, which all indicate the fact that

the creation of the Act was not followed-up by sufficient informative activities explaining specific rights and obligations. The Ombudswoman report for 2020 shows that the potential whistleblowers are not sufficiently familiar with the law and legally defined procedures of reporting irregularities as there was a relatively small number of internal notification procedures conducted. The report also suggests that in some cases (potential) whistleblowers do not have confidence in the internal procedure and opt directly to the external reporting. There have been public cases of sanctioning whistleblowers. The most recent is that of Adrijana Cvrtila, whose whistleblowing and testimonies on the corruption in the local utility company led to the arrest of the mayor of Kutina and three other local politicians. It also led to her losing her job for which she is now fighting in court based on the Act for the Protection of Persons Reporting Irregularities (Prerad, 2022).

The Trade Secrets Directive (Directive (EU) 2016/943) has been implemented in Croatian law by the Act on the Protection of Undisclosed Information with Market Value (NN 30/18), in force as of 7 April 2018. The Act defines trade secrets as information that meets all of the following criteria: 1) it is secret in the sense that it is not generally known among or readily accessible to persons within the circles that normally deal with the kind of information in question; 2) it has commercial value because it is secret; 3) the person who is lawfully in control of the information, undertook reasonable steps to keep it secret. Disclosure and unauthorized acquisition of trade secrets, except when in the public interest, is a criminal offense punishable by imprisonment according to the Article 262 of the Criminal Code.

In the context of access to information, trade secrecy is primarily inherent in public authorities who perform some form of economic activity (companies in which the Republic of Croatia and local and regional government units have separate or joint majority ownership, and part of public institutions). Alen Rajko is one of the key authors discussing the intersection between the right of access to information and various grounds for restricting it. In his paper on Trade secrets of public companies in Croatian legislation and legal practice, Rajko (2015) highlights several aspects of consideration when trade secrets is used for restricting the right of access to information: there is a general content limit on restricting access, as well as a general time limit on the unavailability of information; the decision should be subjected to the test of proportionality and public interest; and trade secret does not constitute a basis for restricting the access to information when managing public funds is in question.

The Media Act contains media-specific provisions requiring the disclosure of ownership details to public bodies as well as regular updates of the ownership information to the public. Article 32 of the Media Act obliges publishers to report annually to the Croatian Chamber of Economy the company and headquarter information, names and residence of all legal and physical entities who directly or indirectly own stock or shares, along with the information concerning the percentage of stock or share. The Act also stipulates sanctions for non-reporting of ownership information (Article 59). In 2011 the Act was amended with a paragraph to Article 32 stating that any cover-up of the ownership structure by any means is forbidden. Yet, the Act does not have an explicit definition of the ultimate beneficial owner. According to the Act these can be either physical or legal entities. The obligation to inform the relevant public authority of any ownership change greater than 10 % has been in place since 1992, while the measures to increase the transparency vis-a-vis the public were broadened in 2003 (Peruško, 2011).

Before introducing the new Electronic Media Act in 2021, the old one was amended in 2011 to improve the transparency of the ownership structure of media publishers (up to natural persons) and prevent the transfer of broadcasting licenses (Peruško, 2012; GONG, 2013). The 2021 Act (Article 61) seeks to improve transparency of media ownership by requiring media service providers to report to the Agency for Electronic Media (AEM) (<https://www.aem.hr/en/>) name and surname and residence of all legal and natural persons who directly or indirectly became

holders of shares or business stakes in that media service provider, with information on the percentage of shares or business stakes. Media service providers are required to submit to the AEM certified copies of documents on the acquisition of shares or business stakes in that media service provider during the previous year and an excerpt from the Register of beneficial owners, except when the shares and stakes are less than 1 % of the capital value. They are also required to publish any change in ownership structure in the Official Gazette. The Act also prohibits any concealment of the ownership and contains a possibility of sanctions for non-fulfilment of all the listed obligations related to ownership transparency. However, this Act applies only to audio and audio-visual media and electronic publications. Printed press is a subject of the general Media Act, which does not contain such detailed requirements and it is currently not clear whether the printed press would also be included in this more detailed and integrated register of media ownership.

The Registry of Beneficial Owners (including media) (<https://www.fina.hr/registar-stvarnih-vlasnika>) was established as a publicly accessible register in January 2020, and all the legal entities were obliged to be enter their data by the end of 2019, following the EU directive.

Deficiencies related to media ownership transparency have been one of the key issues raised and discussed by the media scholars in the country (see Zgrabljic Rotar, 2003; Malović, 2004; Peruško, 2011, Peruško, 2012). The issue of the ultimate beneficial owners or individuals who ultimately control or own a media company remains problematic (Bilić, 2020). The study published by the civil society organization Citizens Organize to Monitor the Elections (GONG) in 2013, warned that the register of the AEM provides sufficient information on the formal owners of the media. For decades suspicion persists that behind some of the listed owners there are the hidden actual owners who exert influence. As this is of course illegal, there is no public information that could prove the situation either way. In the past, relevant information may have differed between different registers (i.e., the media ownership register of the AEM and the court register of companies) and, as GONG underlines, some publishers are reluctant in providing the complete and detailed information, especially if the requirement is not clearly stipulated by law.²¹

Since the introduction of the Registry of Beneficial Owners, the public can search this online registry free of charge and find out the natural persons who have been registered as owners of the media.

2.4. The Accountability System

2.4.1. Development and Agency of Change

Professional Croatian Journalists' Association (HND) and the Union of Croatian Journalists (SNH) are the key agents in the area of accountability. However, this is not due to their effectiveness and membership strength, but rather because there are no other instruments of professional and market accountability. Public accountability instruments are weak and fragmented, and political accountability is still not fully independent from political elites and their interests. The AEM is charged with oversight of content in terms of the legal requirements, and the public service HRT and HINA are subject to yearly reports to the parliament. HRT is also accountable to its Oversight board as well as to the government by way of the AEM.

The Ombudsman for human rights also has a role in protecting media freedom, but their role is limited by the political unwillingness of the ruling HDZ party to engage with the critique.

²¹ Nada Zgrabljic Rotar highlights the problem of ownership transparency (October 2022, contribution in interview).

In terms of the media accountability for published content, it is the courts who finally have the last say if the matter is brought before them. A high number of SLAPPs is seen by scholars to pressure the media instead of improving their quality.

2.4.2. Existing Media Accountability Instruments and an Evaluation of Their Effectiveness

2.4.2.1. Professional Accountability

In Croatia, there is no press or media council. The idea of a media council in Croatia, as a media ethics self-regulatory body composed of journalists, editors, and members of the public, was discussed by Vilović (2009) but it never came to existence.

The main professional journalists' association in the country is the HND, which was founded in 1910, and which is a member of the International Journalist Federation (IFJ) and the European Journalist Federation (EFJ). It reports to have more than 2 500 members. HND publicly promotes professional standards and values of journalism and warns about various negative conditions that the profession is facing with. One of the HND's bodies is Journalistic Council of Honour, which monitors the behavior of journalists according to its Code of Ethics (HND, 2009). While it regularly issues warnings, breaches and severe breaches, these self-regulatory measures do not have enough strength or enforcement mechanisms to improve the overall professional standards and editorial independence in the country. The only sanction is that of a reprimand to the journalist and the media in which the offending content was published, and its publication on the HND website and in its journal (Skoko & Bajs, 2007).

The HND's Code of Ethics entails the key principles for journalistic conduct but has not been updated to account for various and emerging challenges that journalists are facing in the information environment where online platforms are playing increasingly important role in the production, distribution, and consumption of journalism.

2.4.2.2. Market Accountability

In Croatia, there are no media ombudspersons at the newsroom or media company level with an impact on journalistic practice. If existent, organizational codes of ethics with an impact on journalistic practice are not publicly promoted or available. The only exception is the public service media (HRT), which has its Code of Ethics and General Rules of Conduct, but the documents are no longer publicly available on the HRT website (<https://o-nama.hrt.hr/hrt/dokumenti-zakoni-pravila-pravni-akti-7761>). These documents have been discussed as deficient and overly restrictive to journalists (see Nenadić, 2020).

The status of journalists and conditions in journalism are often a topic in media discourse. The analysis of the most popular topic in Croatian journalists' tweets, conducted by Nenadić (2020) showed that journalism is the most frequent topic appearing in the Twitter posts of sampled Croatian journalists, after politics. Nenadić (2020) suggests that the high interest of journalists in discussing their own profession on Twitter may be related to the constant struggle of journalists in Croatia for economic stability, editorial autonomy, and respect for professional standards. We have not observed any practice of commercial media editorial blogs or streaming of editorial meeting that would qualify as online transparency tools with an impact on journalistic practice. There is an online publication MediaDaily (<https://mediadaily.biz/en/home/>) that follows developments in the media and telecom industry in Southeast Europe, with Croatian chapter.

2.4.2.3. Public Accountability

There are some media-critical initiatives and NGOs and academic centers which deal with media; however, it is not clear what is their impact on journalism practice. There are only two literature units found in literature review which at least partly deal with public accountability as discussed in the "MEDIADCOM" project. Civil society was important in forming media policy

at the end of 1990s, when a network of civil society groups and media experts demanded legislative changes to ensure media freedom (Peruško et al., 2011). In 2000s, there were public discussions held about the role civil society should have in the Council of HRT and in the Electronic Media Council, but besides media experts, civil society representatives were excluded from the discussions (Peruško et al., 2011). The only recent overview of public accountability is found in *The European Handbook of Media Accountability* (Malović, 2018). In this overview, Malović (2018) emphasized higher education institutions and journalism students as main actors in public accountability, citing student projects at the University Sjever and Faculty of Political Science in Zagreb.

Active academic and civil society organizations are listed below. They are engaged in public discourse through conferences, press releases and through Internet and social media. An important aspect of web-based media criticism is the fact-checking media platform, in Croatia called Faktograf. Besides that, there is no visible web-based media criticism by civil society actors in form of, e.g., media blogs with an impact on journalism practice. Furthermore, it is difficult to measure such meta-discourse as there is scarce research or data pertaining to this issue. Because of lack of literature on the subject, it was also difficult to capture longitudinal trends and critical junctures in public accountability.

The Centre for Media and Communication Research (CIM) (<https://cim.fpzg.unizg.hr/>), at the Faculty of Political Science, engages in media research and monitoring, focusing on media systems, media policy, media market, journalism, and media audience research. It is a Croatian partner in Reuters Institute Digital News Report since 2017, as well as in the Worlds of Journalism Study, which are visible projects with a potential to provoke public discussion on media. However, its activities are mostly focused on promoting academic research on media, rather than media-critical advocacy.

The Institute for Development and International Relations (IRMO) (<https://irmo.hr>) is a research institute whose Department for Culture and Communication engages in media research and monitoring projects. It is engaged in media policy research, and research on digital political economy, digital platforms, and labor. It is the Croatian partner in Media Pluralism Monitor since 2015, which is a visible project with a potential to provoke public discussion. However, its activities are mostly focused on academic research on media, rather than media-critical advocacy.

The Association for Communication and Media Culture (DKMK) (<https://dkmk.hr/>) is a non-governmental organization which focuses specifically on media. It is primarily focused on advocacy and educational activities in media literacy, mostly oriented towards children, young users, parents, and educational institutions. As it mostly focuses on media users, it has less impact in terms of public accountability of media and journalism.

Although the HND and the SNH belong more closely to the concept of professional accountability, they are also engaged in media-critical initiatives and advocacy. In 2021, together they organized a campaign “Local media to citizens, not to sheriffs”,²² which advocates more autonomy of local media from (local) political power. These two organizations also organized a campaign #zajednobezmržnje (“together without hate”) in 2021, which discusses hate speech in public discourse and hate attacks oriented towards journalists.

Faktograf (<https://faktograf.hr>) is the biggest Croatian fact-checking organization. It was established in 2015 as a project from HND and the NGO GONG. Since 2021, Faktograf is operating as an independent civil society organization. It is registered as a non-profit media, a name used for

²² The word “sheriff” in Croatia alludes to the position of local mayors and governments, who are usually perceived as governing without transparency and by capturing public institutions and local media.

the third sector or community media in Croatia. Faktograf is a member of the International Fact Checking Network. Since 2019, it is a member of Facebook Third Party Fact Checking program and is engaged in identifying and reviewing misinformation on social media. It is often under attack from certain political actors, media and civil society groups, and the attacks became especially pronounced during the COVID-19 pandemic, when Faktograf was engaged in fact-checking misinformation on COVID-19. However, as in recent period Faktograf is mainly financed by Facebook, it is unclear whether it belongs to the institution of public accountability.

Citizens Organize to Monitor the Elections (GONG) (<https://gong.hr>) is the most prominent non-governmental organization which deals with transparency, democratic process, political communication, digital democracy, the role of media in a democratic process and media and digital literacy. It was established in 1997, and in the beginning focused on the monitoring of the electoral processes but has over the year expanded its activities on monitoring and advocacy of wider democratic processes. It is actively engaged in advocacy of transparent governance and media autonomy. GONG is also engaged in research projects concerning media, political communication, and political and economic pressures on media. For example, it is a partner in the Croatian chapter of the European Digital Media Observatory (EEDMO); it was engaged in monitoring of hate speech during political campaigns and in media (Hoffmann, 2015, 2016); analysis of different political and economic pressures on journalism practice (Klancir, 2021); or ownership structure and influence of ownership on local media (Mirković & Žagar, 2013). Together with Human Rights House Zagreb, it developed an online tool for reporting hate speech in the media, on the Internet and social media (<https://www.dostajemrznje.org>).

The Human Rights House Zagreb (<https://www.kucaljjudskihprava.hr>) was established in 2008 in Zagreb, connecting several civil society organizations that deal with human rights. Although media are not in primary focus, it sometimes includes media-critical initiatives in advocacy of human rights issues. For example, it organizes public discussions on the impact of digital platforms on human rights, discussions on the effects of media policy on human rights and hate speech in online media. It publicly advocates protection of freedom of speech and reacts on breaches of freedom of speech.

Kurziv is a non-governmental organization monitoring and advocating independent culture and media. Its activities are primarily focused on the digital media outlet Kulturpunkt (<https://www.kulturpunkt.hr/node/29>) which deals with independent culture and the media, organizing lectures, discussions, and workshops on the subject.

2.4.2.4. Political Accountability

The media sector is overseen by the Ministry of Culture and Media, which only added media in its title in 2019. There are two media-related sectors in the Ministry: Sector for media and Sector for audio-visual activities and promoting entrepreneurship in cultural and creative industries. In Croatia, Media Strategy was announced and started to be developed by the Ministry during the left-liberal coalition government but was not adopted in the mandate (2011–2015). During this period, Ministry was engaged in numerous discussions with different stakeholders, ranging from media, professional journalists' associations, media experts, and civil society, and engaged in research on media system, and journalism in Croatia.²³ The result of these activities was a document named "Draft Proposal for the Media Policy of the Republic of Croatia until 2020", but the actual Media Strategy was never adopted. In this period, Ministry was also engaged in promoting media pluralism by establishing a subsidy program for community media and independent journalistic projects, which received some criticism for lack of transparency (Bilić et al., 2017). After the parliamentary elections in 2015, a new conservative government

²³ The list of the discussion and documents related to the process can be retrieved here: <https://min-kulture.gov.hr/izdvojeno/izdvojena-lijevo/mediji-16434/arhiva-9818/rasprava-o-medijskoj-politici/11833>.

came to power, and a controversial new minister became a head of Ministry of Culture. The new minister abruptly suspended the subsidy program and in his public speeches took an aggressive stance towards progressive media and independent culture. The Media Pluralism Monitor for 2016 evaluated the position of media during this period as: “there were social and political pressures towards the media regulator and an unfavorable policy towards the community, minority and non-profit media” (Bilić et al., 2017, p. 2). Following the new elections in 2016, a more moderate new minister, still under conservative government though, made another announcement of developing a Media Strategy (which never materialized). In 2021 Croatia enforced a new Electronic Media Act to transpose the 2018 EU’s Audiovisual Media Services Directive.

The post-socialist media policy in Croatia aimed at regulation of distribution of broadcasting frequencies, and while broadcast media were more heavily regulated, the press was expected to be self-regulated (Peruško et al., 2021). The first regulatory bodies for broadcasting were established in 1990s (Council for Telecommunication and Council for Radio and Television), and press council was never established. In the 1990s, regulatory bodies decided on licensing usually following political decisions and interests, and licenses were often given to actors close to the ruling political party (Peruško, 2012). Council for Telecommunication is most known for an act of censorship, when in 1996 it denied a broadcasting license to an independent radio critical of government (Radio 101), after which one of the largest citizen protests in Croatia was organized to protest the Council’s decision. After the protest and continuing public pressure, the decision was withdrawn.

The media policy and forms of regulation changed with the turn in government in 2000. The AEM is the main media regulating body set by a government, established in 2003, whose major role is licensing and regulation of electronic and online media and promotion of media pluralism and media literacy. It is also responsible for reacting on breaches of the Electronic Media Act, by issuing warnings or sanctions (for example, it is responsible for reacting on breaching on hate speech regulation in the media). It was established in line with the 2003 Act. The establishment of the AEM coincided with the turn towards the “pluralist media policy” with “lifting of restrictions on media freedom, liberalization of ownership, and the establishment of public service broadcasting” (Peruško et al., 2021, p. 157). According to the latest Act (2021), its duties are: licensing and registering broadcast and online media, media monitoring, issuing warnings and sanctions for breaching Act, ensuring protection of media pluralism (e.g., by issuing opinions on media concentration, and by managing a Fund for Media Pluralism and Diversity), reacting to citizen complaints, reporting to Croatian Parliament and European Commission, promotion of media literacy, promotion of media research and public discussions about electronic media, etc.

Electronic Media Council is the governing body of the AEM. Members of the Electronic Media Council are appointed by the Parliament based on the proposal of the government. There are seven members of the Council, including the president, and the Electronic Media Act defines that members of the Council cannot be connected to media companies or media connected companies, and cannot be state officials, to prevent the conflict of interest (Peruško et al., 2011). Since 2009, the mandate of the Council lasts for five years (Peruško et al., 2011). Electronic Media Council was constituted for the first time in 2004. The procedure for Council constitution was done according to the law, but it did not pass without criticism from civil society, who saw the process as untransparent (Peruško et al., 2011).

The evaluations of the impact of the AEM are often not very positive. After the politically biased regulation in 1990s, regulatory bodies have become more transparent in 2000s, and were on a path on becoming independent (Peruško, 2005; Peruško et al., 2011). However, bias towards powerful political or economic agents is still noted in decisions on license allocation, e.g., when

two large international media companies received licenses for new television channels in 2011, despite possible risks for media pluralism (Peruško, 2012). The AEM was at certain period under political pressure for its decisions. In 2016, the Electronic Media Council issued a three-day broadcasting suspension to a local television outlet as a sanction for hate speech in one of its programs. This decision provoked reaction from the radical right politicians, public figures, and civil society, who organized a protest and violently entered the AEM. After that event, the Government rejected the annual report by the Council of Electronic Media and proposed to the Parliament to vote for removing the members of the Council (Bilić et al., 2017, p. 4). Faced with strong political pressures, the president of the Council offered her resignation. After the failure of this Government in 2016, pressures towards the AEM waned (Bilić et al., 2017). Today, the AEM is often evaluated as having a passive role and not “sufficiently effective in terms of monitoring and market regulation” (Peruško et al., 2021, p. 161). In terms of reacting to hate speech in the media, it is also evaluated as not having a proactive role, but reacting only upon receiving complaints (Bilić et al., 2021).

2.4.2.5. International Accountability

International actors in Croatia are present in the form of international professional organizations which cooperate with Croatian organizations, in the form of EU institutions, or international foundations.

HND and SNH are members of international professional organizations like International Federation of Journalists and European Federation of Journalists. HND is cooperating with Southeast Europe Media Organization (SEEMO). Unresolved issues in the Croatian media sector resulted with visits by the international mission for media freedom composed of several European media associations in 2016 and early 2018.

The Croatian Office of the European Parliament organizes conferences and discussions on the state of media and journalism in Croatia, and advocates and reacts on the issue of media freedom.

In Croatia, several German political foundations are operating and promoting public dialogue on various themes, including media. For example, Friedrich-Ebert-Stiftung (FES) and Konrad Adenauer Stiftung organize conferences and discussions about media policy and state of media and journalism in Croatia.

3. Risks and Opportunities in the Journalism Domain

3.1 Development and Agency of Change

The development and transformation of the media market in the first decade covered by this study (2000–2010) primarily took place through liberalization of the market and market entry of foreign owners, who soon became dominant agents in the market. The digital transformation after 2010 seems to have worsened already weak professional standards. The public service media is the largest news media organization in the country, which legally transitioned from a state broadcaster to a public service media in 2001. However, even to this day, it has not managed to position itself as politically independent and a leader in professional standards and technological advancements in journalism. A negative role was played by commercial media owners regarding the status of the public service HRT, with their lobbying and pressure to reduce their advertising time and public funding.²⁴

²⁴ Antonija Čuvalo (November 2022, contribution in interview).

The economic crisis of 2008, followed by the COVID-19 pandemic, have negatively influenced the Journalism domain.²⁵ The main agents were the government with their aid packages (in the recent pandemic), and media owners who variously influenced the position of journalists. These risks were difficult for the journalists to mitigate. In the past 20 years, journalists have worked in increasingly deteriorating conditions, required to work more for lesser pay and in less secure circumstances. The linking of “fake news” to journalists/ism can also reduce their credibility, and the increased threats in the online environment have also contributed to the worsening of journalistic conditions over the two decades.²⁶

3.2. Market Conditions

According to the register of the AEM, there are 31 digital terrestrial television channels broadcasting in Croatia – 153 radio broadcasters, 18 on-demand media providers, 177 Internet and satellite media providers, 437 online publications and 71 non-profit media (AEM, 2022). Among these, 11 are terrestrial television channels with national coverage – four public television channels (general HRT 1 and HRT 2, specialized culture channel HRT 3, and news channel HRT 4), two commercial general channels (Nova TV, and RTL), and five specialized commercial channels (entertainment Doma TV and RTL 2, CMC music television, children channel RTL Kockica, and sports channel Sportska televizija) (AEM, 2022). Of 153 radio stations, six are with national coverage (three public and three commercial). Other stations are either regional or local. In 2020, Croatia had 13 daily newspapers, of which three with general and national focus.

Croatian online journalism started establishing itself as the relevant media from 2000, and in 2003 they reached the legacy media in the number of users (Brautović, 2010). The development of the online media market was mostly led by the online natives, but in recent years among the most popular websites are also online publications by legacy media (Brautović, 2010; Galić, 2018). The 2020 Digital News Report by the Reuters Institute for the Study of Journalism of the University of Oxford shows that top five online publications are Index.hr (online native), *24sata* (tabloid daily newspaper), Jutarnji.hr (daily newspaper), Net.hr (online native), and Dnevnik.hr (linked to a commercial TV) (Newman et al., 2020). Legacy media’s online publications are not identical in content to their parent media, but rather report and present content in a way adapted to the online environment. In 2020, a new online medium, Telegram.hr, joined the list of top ten online media brands (Newman et al., 2020).

The overall list of the top ten media brands in the country (encompassing print, TV, and radio) is led by audio-visual programs. The most popular is commercial Nova TV News, followed by the public service broadcaster HRT News, and commercial RTL News (Newman et al., 2020). Amongst the top ten is also N1, a cable news channel launched in 2014 as a CNN affiliate and serving the region of former SFR Yugoslavia with headquarters in Belgrade, Sarajevo, and Zagreb.

Between 2015 and 2020, the Croatian media market employing about 4 000 people and made about 2.4 billion HRK in total annual revenues (app. 320 million EUR). The annual 2019 report by the Central Bureau of Statistics shows that there were 4 088 persons directly engaged in production of TV programs and 3 547 in the production of radio. It should be considered that due to the media convergence these figures should not be observed cumulatively but are likely to overlap significantly, even when taking the print and online media workforce into consideration. According to the 2011 census, the total number of persons with a journalistic profession (31 March 2011 is considered the reference date) were 5 452, of whom 525 were unemployed and 4 909 were working. Of the engaged journalists, 1 075 work outside journalism, most often

²⁵ This is also the opinion of Maja Sever (October 2022, contribution in interview).

²⁶ Maja Sever (October 2022, contribution in interview).

in marketing, advertising, and public relations. Thus, it remains that at the beginning of 2011, there were 3 852 working journalists in Croatia – 506 freelancers, and 3 346 with employment contracts.

The overall production of in-house TV program in 2019 was more than 200 000 hours, of which one quarter, or the most represented program in general, was information and documentary. In radio content, information program accounted for around 15 % of the overall production, while the music was more than 65 % (DZS, 2021).

Between 2000 and 2014 the commercial television market has grown from one national and 12 regional / local channels to seven national and 20 regional / local channels (Ministry of Culture, 2015). Commercial television revenues were also growing until 2008, when the global economic crisis struck, but their loss afterwards is relatively less than for other legacy media, and especially compared to newspapers who suffered the biggest loss (Ministry of Culture, 2015). In addition to the print news media, local television is another part of the Croatian media system significantly affected by the crisis, poor management, and non-sustainable business model (Ministry of Culture, 2015).

The media company Media Servis plays an important role in the radio market, producing radio programs and selling them to local and regional radio stations. The company was founded in 2002 and is affiliated with Radio Antenna (Peruško et al., 2011). The informative program by Media Servis is widely used by both the most listened national stations and the local ones, which reduces diversity and pluralism especially in local news offerings (AEM, 2015; Peruško et al., 2011).²⁷

The trend in the print media market in the 2000s was an increase in overall publications, but a decrease in circulation of daily newspapers (Gavranović & Naprta, 2008; Peruško et al, 2011).

In the period between 2008 and 2013, following the global financial crisis, the conditions for the newspaper industry in Croatia were further exacerbated. The analysis provided by Vozab (2014) showed the constant decline in circulation of daily newspapers and shutting down of three newspapers that failed to cope with the challenges. The situation did not improve with the time as the analysis in fact showed the sharpest decline in circulation in the last year encompassed by the study. Furthermore, the advertising revenues for all media except online were reduced significantly, and the print media were hit by the biggest loss (Ministry of Culture, 2015; Vozab, 2014). However, not all the publishers were affected in the same way. While most newspapers in their financial statements reported the loss of sales and advertising revenues in the period from 2009 to 2013, *24sata* recorded an increase in revenue in 2013 (Vozab, 2014). To mitigate the losses, the leading newspaper publishers were mainly cutting the costs by dismissing their employees, laying off 22% of employees in the period from 2009 to 2013 (Vozab, 2014). The exception was again *24sata*, which increased the number of employees from 2008 to 2013.

The interesting thing about the Croatian case is that the biggest advertisers in the daily press for a certain period were the newspaper publishers themselves – Styria Medien AG, Europapress Holding, and Konzum, which operates under the same conglomerate (Agrokor) as the leading press distribution network (Tisak) (Vozab, 2014). According to the more recent data available from the media, the leading advertisers are telecommunication companies (also operating cable TV) and supermarket chains. Native advertising became so common that it is often not marked properly to differentiate it from the news articles.²⁸

²⁷ The disappearance of journalists in radio programs was noted by Nada Zgrabljic Rotar (October 2022, contribution in interview).

²⁸ Gordana Vilović (November 2022, contribution in interview).

The main direct state subsidy to the media is provided through the Fund for the Promotion of Pluralism and Diversity, which is managed by the AEM in accordance with the Electronic Media Act. The Fund receives 3% of the total monthly funds collected from the HRT fee paid by citizens.

Some local governments also provide direct subsidies for local media – for example, the City of Zagreb awards small value grants for co-financing the production and publication of programs promoting topics relevant to the City. Furthermore, the Electronic Media Act (Article 38) requires state bodies, public institutions, and legal entities owned by the Republic of Croatia to spend 15% of the annual amount intended for advertising their services or activities in audio-visual or radio programs of regional and local television broadcasters and / or radio and / or online media registered in the Register of Providers of Electronic Publications, with the AEM.

Table 1: Main media outlets in Croatia

Public service media (type of funding)	HRT (Croatian Radiotelevision, television branch HTV, HR radio) (license fee and advertising)
Dailies (ownership)	<i>24 sata</i> (foreign owner, Styria Medien AG)
	<i>Večernji list</i> (foreign owner, Styria Medien AG)
	<i>Jutarnji list</i> (domestic owner, Hanza Media)
	<i>Slobodna Dalmacija</i> (domestic owner, Hanza Media)
	<i>Novi list</i> (majority foreign owner, JOJ Media House)
Main private TV broadcasters (ownership)	Nova TV (foreign owner, United Group)
	RTL TV (foreign owner, CEM Enterprises)
	N1 (foreign owner, United Group)
Main private radio broadcasters (ownership)	Otvoreni radio (domestic owner)
	Narodni radio (domestic owner)
	Antena radio (domestic owner)
Main digital media outlets (ownership)	24sata online (foreign owner, Styria Medien AG)
	Index.hr (domestic owner)
	Net.hr (foreign owner, RTL Group)

Source: adjusted and updated based on Peruško et al. (2021, pp. 178–179)

The Croatian media market in general terms may be seen as relatively diverse, especially considering the size of the market and its economic strength or lack of it. However, when focusing on specific media markets the concentration is high. Two publishing companies, Styria Media Group and Hanza Media, account for between 70 and 90% of the newspaper market (AZTN, 2021). Two commercial televisions (Nova TV and RTL) share five of the 11 national television channels and 80% of advertising revenue (Ministry of Culture, 2015). Two agglomerations control more than half of the radio market. The largest media owners in the country are foreign media corporations, and this has been the case, with some changes in ownership structures, for the past 20 years (Peruško, 2003; Peruško et al., 2011; Grbeša & Volarević, 2021). The expansion of foreign ownership in the Croatian media market took place from the beginning of the 2000s with the main investors initially being the companies from Germany, Switzerland, and the Scandinavian countries, especially in the print media (Peruško, 2003; Peruško et al., 2011).

The Austrian Styria Media Group owns two out of the three bestselling newspapers – the tabloid *24sata* and the general, conservative leaning newspaper *Večernji list* (Grbeša & Volarević, 2021),

and had the share of 50–60% in the daily newspaper market in 2020 (AZTN, 2021). The second position in the daily print media market holds Hanza Media, formerly the Europapress Holding (EPH), which was bought by a late prominent Croatian lawyer and businessman in 2014 when it was on the verge of bankruptcy (Grbeša & Volarević, 2021). EPH was the biggest Croatian print media company in which the 50% of ownership shares was held by German WAZ (Westdeutsche Allgemeine Zeitung, today Funke Mediengruppe) (Peruško, 2003). Hanza Media publishes a left-leaning general daily with the largest readership of non-tabloid daily press (the first is the tabloid *24sata*), *Jutarnji list*, and a variety of other newspapers and magazines (Grbeša & Volarević, 2021). In 2020, Hanza Media had a market share of 20–30% in the daily newspaper market, which represents a slight decline from 2019 (AZTN, 2021). The third publishing group is Glas Istre (with regional and local daily newspapers *Novi list*, *Glas Istre*, and *Zadarski list*), in which the controlling share is held by JOJ Media House, a.s. from Bratislava (Slovakia). It reached a cumulative market share of 10–20%, but is recording a stagnation (AZTN, 2021).

The data reported by the AZTN (2021) show that in 2020 all news dailies in Croatia together sold 42.9 million copies, which is significantly less than in 2019 (53.3 million copies sold). The decrease in sales was recorded for all news dailies. In fact, there has been a continuous decline in the copies sold between 2017 and 2020. The decrease is also recorded in advertising revenue – 22% less in 2020 compared to the previous year. When observed by individual publishers, the decline in advertising revenue for daily newspapers ranges from 11–36%. The largest share in the advertising market for 2020 was held by *Jutarnji list* (Hanza Media) at 20–30%. The same share was held by two dailies from the Styria Group together (*Večernji list* and *24sata*).

Commercial television media market is dominated by Nova TV and RTL, which are both owned by foreign companies. Until 2017, Nova TV was owned by the Central European Media Enterprise (CME) and today it is a part of the United Group, whose owner is the British investment fund, BC Partners (Grbeša & Volarević, 2021). German RTL owned seven channels in Croatia – RTL (general), RTL 2 (entertainment), RTL Kockica (children), and several specialized channels in cable TV. In February 2022, it was announced that RTL was sold to the subsidiary of the Czech investment group PPF – Central European Media Enterprises (CME), the former owner of Nova TV (HINA, 2022).

Public radio and television are the largest news media organization in the country, both in terms of the amount and variety of content produced and in the number of employees, the audience, and the scope of financial capital circulation in the industry (Ministry of Culture, 2015). HRT broadcasts four television and three radio programs at the national level, eight regional radio programs (Dubrovnik, Knin, Pula, Rijeka, Zagreb / Sljeme, Split, Zadar, and Osijek) and one international radio (Glas Hrvatske) via the Internet. It also has its online outlet Hrt.hr, which, in addition to a review of written news and program schedules, offers HRT programs on demand (Ministry of Culture, 2015).

3.3. Public Service Media

Following the closure of the daily newspaper *Vjesnik* in 2012, public service media in the country include the Croatian News Agency (HINA) and the Croatian Radiotelevision (HRT). HRT has four television and three radio channels at the national level. The fourth channel of Croatian Television began broadcasting in December 2012. The program is informative and consists mainly of daily news and current affairs programs.

The Croatian Radiotelevision Act (NN 137/10, 76/12, 78/16, 46/17, 73/17, 94/18) obliges HRT, as a public service media, to produce programs that meet the democratic, social, and cultural needs of Croatian society, guaranteeing pluralism and including cultural and linguistic diversity. Public service media remit is detailed in chapter 3 of the Act, highlighting, in particu-

lar, the role in: informing the public about political, economic, social, health, cultural, educational, scientific, religious, environmental, sports and other events and phenomena in the country and abroad and ensuring open and free debate on all issues of public interest; producing, co-producing and publishing feature, documentary and other audio-visual works, as well as various musical and radio works, contributing to the development of Croatian culture, arts and entertainment, especially with the intention of preserving Croatian national and cultural identity; producing and publishing educational programs for children, youth and adults, and scientific programs; programs intended for informing Croatian citizens outside the Croatia, as well as programs intended for the public in Croatia relating to the life, events and problems of Croats living outside the Croatia; programs for national minorities in the Croatia in the languages of national minorities; programs on persons with disabilities, encouraging also the translation into Croatian sign language; programs aimed at achieving gender equality; inform and educate about the preservation of cultural heritage and natural environment; about democracy, civil society and the culture of public dialogue; promoting religious culture and understanding between religions and religious communities; human rights, equality and political rights of citizens; broadcast sports events, entertainment programs, etc.

Even though HRT has formally undergone a transformation from state to public media in 2000s (Šalković, 2000; Car, 2011), the controversies about whether it serves the public or the government remain (Šalković, 2000; Zgrabljic Rotar, 2003; Popović, 2004; Grbeša & Volarević, 2021; Peruško et al., 2021). Grbeša and Volarević (2021) argue that the political influence over Croatian Television (as a part of Croatian Radiotelevision) is being exercised mainly through the management appointment procedures.

HRT is managed by the Director General. Other bodies of HRT are the Directorate, the Supervisory Board, and the Program Council. According to Article 19 of the HRT Act, the Director General of HRT is appointed and dismissed by the Croatian Parliament. The call for appointment is published by the Supervisory Board of the HRT, which receives applications, gives opinions on formal criteria in accordance with the Act and HRT Statute, and then passes applications to the Parliamentary Committee on Information, Computerization and Media. The Committee conducts interviews with candidates and files a proposition to the Croatian Parliament on the most suitable candidate. With a simple majority of votes, the Parliament elects the Director General for a five-year mandate.

The Supervisory Board has five members, four of which are appointed by the majority vote in the Parliament and based on a public call issued and managed by the Parliamentary Committee on information, Computerization and Media. The fifth member is a representative of HRT employees, in accordance with the HRT Act and the Labor Act (NN 93/14, 127/17, 98/19). Supervisory Board members elect their president and deputy. Their mandate is four years.

The Program Council has 11 members, nine of which are appointed by most votes in the Parliament and based on a public call issued and managed by the Parliamentary Committee on Information, Computerization and Media. Two members of the Council are elected by journalists and other HRT employees who creatively participate in creating the program.

According to the EU-wide Media Pluralism Monitor, the specific indicator on the Independence of PSM governance and funding scores a high risk. Authors of the report for Croatia, Bilić et al. (2021), motivate this score with the high dependency of the PSM management appointment procedures on the Croatian Parliament that in this case decides by a simple majority and thus does not require a political consensus. For the Media Sustainability Index (IREX, 2019), Tena Perišin, a professor of television journalism at the University of Zagreb and former journalist and editor with the PSB, said that Croatia has tried many different governing models for PSM, but it is more about the democratic culture in the country in general than about a governing model. Peruško (2021a) shows how the institutional stability of PSM in the socialist times,

especially in terms of the license fee it collected directly, carried over in Croatia also post-1990. The lack of a social consensus about the required role of the PSM in society (one of the four requirements for PSM success according to Paolo Mancini, 2014) is probably to blame for the troubled consolidation of an independent position of the HRT.

In the past 20 years, HRT was facing constant management and political crises, which contributed to the “steady deterioration of program quality, a decrease in public trust and a continual drip in HRT program ratings” (Car, 2019, p. 93). Car (2019) warns that the quality of programming has been a low priority on the management’s agenda, and hardly any attention has been paid to the working conditions for journalists.

Furthermore, with the arrival of commercial televisions in the early 2000s, HTV began to popularize and commercialize its program to maintain its market position (Car, 2011, 2019). Trying to please a wider audience it has included many soap operas and other entertainment in its program, at the expense of high-quality educational, documentary, children’s, and cultural programs (Car, 2011). The opposite of what was expected, this was drawing viewers away (Car, 2011). Furthermore, due to its perceived political bias, HTV’s primetime newscast lost its highest market share to commercial television Nova TV around 2010 (Car, 2019).

HRT has dual financing from the license fee and from time-limited advertising. Article 35 of the HRT Act determines the license fee at 1,5% of the average net salary in Croatia based on the statistical indicators of the previous year. According to Article 37 of the same, advertising is allowed for nine minutes within one hour and four minutes within one hour during prime time (18:00 to 22:00). The funding of HRT has been stable and based on the obligatory license fee paid by the public. A risk was introduced with the introduction of the program contract, with which the government has the possibility to reduce the license fee for the next contractual period, and in that way the public service broadcaster may be inclined to propose a favorable editorial policy.

HINA is the leading news agency in the country. It receives basic financing from the State Budget and has also been a beneficiary of some public funds (Ministry of Culture, 2015), which raised concerns related to unfair state aid as HINA also performs commercial activities by selling its products and services (Ministry of Culture, 2015). The relevant research shows that there have been no major reports and indications of the overt political influence on HINA in recent times, but the parliamentary appointments of its Management Board is still seen as a potential bottleneck for appointing politically favorable candidates (Bilić et al., 2021).

3.4. Production Conditions

According to the IREX Media Sustainability Index (2001–2019) that evaluates media sustainability in relation to five areas – free speech, professional journalism, plurality, business management, and supporting institutions – in 2001 Croatia performed worst on plurality, while in 2019 the lowest scoring was on professional journalism. The report highlights that “while there are active pockets of good journalism in Croatia, the indicators of professional standards in journalism have been in decline long enough that it can almost be considered an irreversible trend, rather than just the consequence of a temporary industry crisis” (IREX, 2019, p. 6). The report, which is based on a panel with a small number of experts (journalists and members of NGOs), also states that plagiarism is a matter of daily practice, the reporting often lacks background information and context, and that niche reporting, including investigative or business reporting, is essentially extinct. Their rating of Croatian media in 2019 as unsustainable is a little over the top, reflecting more the critical position of the expert panel than the actual comparative position of this media system in relation to other SEE or EE media systems.

HRT began the process of digitalization and automation in 2001, which resulted in the acceleration of news production processes, increased editorial control over journalists' work, centralized newsroom organization, and introduced new work routines (Brautović, 2009). How things worked prior to the newsroom computer system implementation is best illustrated by one of the interviewees in Brautović's (2009) study: "I was raised to work according to the principle – You are a journalist, you do not touch the equipment. To this day, I have a mental hindrance when a rough cut is needed. I always remember the editor warning me not to touch the knob " (p. 32). Today, of course, journalists are expected to be familiar with and use the digital equipment, and those with such knowledge are preferred in comparison to more seasoned journalists without it.²⁹

At the end of 2012, HRT announced its reorganization towards the convergent integrated newsroom and the establishment of a single news media service serving different media platforms (Perišin, 2013). However, as Perišin (2013) notes, from the very beginning of the process its rationale and goals were not communicated effectively, which resulted in most staff being skeptical and resisting the true change.

3.5. Journalists' Agency

The status of journalists in Croatia is vulnerable and journalists are very poorly protected both economically and professionally, particularly from SLAPPs. Unions are not well established in many of the commercial media, and journalists working in commercial media often do not have protection in the form of collective working agreements.

A limited number of studies looked at how journalists in the country are adopting new technologies and platforms, and how digitalization may be affecting newsroom dynamics. Available studies are focusing mainly on how media / journalists are sourcing news from blogs (Brautović, 2007), and particularly from social media (Šošić, 2019; Volarević & Bebić, 2013) or on how journalists perceive the importance of social media in their work and in content production (Žlof et al., 2014). In one of the first studies to explore the frequency of sourcing news from social media by television journalists in Croatia, Volarević and Bebić (2013) found that there was an increasing relevance of Twitter as a source of information, along with Facebook. With content analysis they examined the extent to which the news reports of two leading television channels (one public, one commercial) contained information derived from social media. Findings showed that public HTV usually used social media as a source of hard news, while commercial TV (Nova TV) explored social media more in the context of entertainment. In her later study, Šošić (2019) found no statistically significant difference among public and commercial channels in the frequency of using social media to source news.

Gordana Vilović ³⁰notes that the important development of investigative journalism in the past 20 years is the result of the dedication and professionalism of journalists alone, and the reason that many corruption stories have been uncovered.

3.6. Journalists' Organizational Working Conditions

In 2015, within the preparatory activities for the discussion on the media policy of the Republic of Croatia 2015–2020, the Ministry of Culture published results of a survey on the experiences and attitudes of media workers in the country (the survey was the WJS questionnaire referenced in Peruško et al., 2016, with some added questions). The survey was carried out between 13 December 2013 and 29 January 2014 via an online questionnaire sent by email to 2 703

²⁹ Nada Zgrabljic Rotar (October 2022, contribution in interview).

³⁰ November 2022, contribution in interview.

addresses of journalists from print, online, radio and television media, and the invitation was accepted by 661 (24%). More than 80% of respondents claimed that the time available for journalistic research has (significantly) decreased. Even more respondents claimed that the commercial and owners' influences have grown and even surpassed the political interference in editorial autonomy. Working hours have increased dramatically and are largely unpaid, and there are increasing numbers of temporary contracts and freelancers. The working conditions have consistently been deteriorating over the past years, due to the global economic crisis but also local market conditions and inability of publishers to find a sustainable business model in the environment where advertising is largely consumed by a couple of global technology companies (Bilić & Primorac, 2018).

The COVID-19 pandemic only further exaggerated already poor working conditions for journalists. At the SNH assembly in late September 2020, it was reported that media employers take advantage of the pandemic as an excuse for reducing journalists' rights and putting the financial burden of covering losses on the employees. The leader of the Union emphasized that the local media are suffering the most, especially independent journalists and freelancers. Among the issues, union members from different media emphasized reduction of pay which is higher than the income loss, cancelling travel subsistence even though journalists do their fieldwork, lack of financial compensation for work-at-home options, etc. At the same time, journalists working in commercial media often do not have protection in the form of collective working agreements, as do journalists on public service media such as HRT and HINA.

According to a non-scientific survey conducted by the HND and the SNH in 2020, 85% of surveyed freelancers and external collaborators, lost all, most, or half of their work assignments since the beginning of the crisis caused by the COVID-19 pandemic. In the first year of the pandemic salaries were reduced by 30 % in Hanza media (one of the major print publishers), although all the media companies received state support for economic recovery. A similar situation happened in Styria (another major print publisher), where salaries were reduced between 5–25%. Some salaries were later resumed, but the overall effect of the pandemic on journalists remains a negative one.³¹

3.7. Intra-Organizational Diversity of Human Resources

The study by Peruško et al. (2016) for the Worlds of Journalism Study project showed that most working journalists in Croatia are women (53,9%); the average age of journalists in Croatia is 44,69; more than 70% have a university degree, the majority in journalism or communication studies (53,0%). Half of the journalists surveyed had more than 20 years of experience, gained in one or two newsrooms. Most of them were full-time employed and without a specific beat, instead covering various topics and subjects (Peruško et al., 2016).

In mid-2013, the public service HRT had 3 358 employees – 41% women and 59% men (Ministry of Culture, 2015). HRT does not have a comprehensive gender equality policy, nor is there a provision on gender equality promotion in the programs of the PSM in the Agreement between the Government and the Croatian Radiotelevision (2018–2022). According to Bilić et al. (2021), women are underrepresented in the PSM Program Council and executive roles.

According to the Central Bureau of Statistics, in 2020 all radio stations in the country had 3 510 employees directly engaged in production of the programs (42 % were women). In the management boards of private TV companies, women are represented, but not at the executive levels. In news and current affairs broadcasting women are largely underrepresented or presented in a stereotypical way, claim Bilić et al. (2021).

³¹ Maja Sever also points to the reduced number of union collective agreements which decreased from 11 in 2000 to 2, making journalism an increasingly precarious work (October 2022, contribution in interview).

In 2014 and 2015, the AEM monitored the Visibility of Women and Men in the Central News Programs of Three Most Watched National Televisions and found that women are almost equated with men as news anchors and journalists, but their statements and opinion as experts make up less than a third of the views expressed by individuals in central news programs.

Similar study was published by Car et al. (2017), who examined a correlation between authorship and representation of women and men in television news. The study found that women took leading positions in central news programs by authoring 42,6% of the analyzed news, while men were at 23,9%. Editorial positions were held in almost equal proportions (38,33% women and 39,44% men). However, men were more visible as news authors as they more often appeared in the author's role in front of the camera, and they were more often presenters of the news program (60%). Women were strongly underrepresented as news sources and experts in news programs, appearing four times less than men (Car et al., 2017). There is a noticeable pay gap in the "information and communication sector" (which includes journalism), and hierarchical and sectorial segregation in Croatian media organizations (Car et al., 2017; Vozab & Zember, 2016).

3.8. Journalistic Competencies, Education, and Training

University journalism education in Croatia started developing late. First journalism university program was established at the Faculty of Political Science in Zagreb in 1970 (Peruško et al., 2021). There are now many media and journalism education programs at several public and private universities and faculties in Croatia, and the number of enrolled students is considered too high in comparison to market demands (Car & Bukvić, 2016). There is a variety of forms of journalism education: "high education scientific and specialist study program at public universities and private schools, as a study program for postsecondary education and in the form of vocational training for both young and professional journalists, organized by their employers or by professional associations" (Zgrabljić Rotar & Vrljević Šarić, 2009, p. 373). Although initial motivation for studies in media and journalism is high among students, it decreases with time, and more students prefer to choose a career of a public relation specialist, rather than journalist (Car & Bukvić, 2016; Majstorović & Vilović, 2012). The dissatisfaction with media and journalism studies is also driven by the student's perception of a lack of practical training and skills acquired at such study programs (Car & Bukvić, 2016; Majstorović & Vilović, 2012), even though the largest such program at the University of Zagreb includes a TV and radio studios and programs as well as a monthly newspaper.

There are a limited number of studies looking at how journalists in the country are adopting new technologies and platforms, and how digitalization may be affecting newsroom dynamics. Available studies are focusing mainly on how media / journalists are sourcing news from blogs (Brautović, 2007) and particularly from social media (Šošić, 2019; Volarević & Bebić, 2013) or on how journalists perceive the importance of social media in their work and in content production (Žlof et al., 2014). In one of the first studies to explore the frequency of sourcing news from social media by television journalists in Croatia, Volarević and Bebić (2013) found that there was an increasing relevance of Twitter as a source of information, along with Facebook.

3.9. Professional Culture and Role Perception

One of the rare and recent investigations of journalism culture in Croatia was conducted by Peruško et al. (2016), within the Worlds of Journalism Study project. Surveyed journalists saw their role in society primarily as the watchdog, striving to monitor and to hold the government or any other power to account. The same study showed that journalists self-perception deviates from the objectivity norm if they understand their role as being more an advocate of social

change. Authors consider this to be related to the (relatively) recent change of the political system, democratization, and “the view that the media should assist in this change” (Peruško et al., 2016, p. 1).

Nenadić (2020) explored the extent to which the practice of Croatian journalists on Twitter departs from the normative professional principles and routines, such as objectivity, gatekeeping, verification, and the separation between journalistic work and commercial practices. She found that “journalists in Croatia continue to recognize the traditional boundaries of their work into the social media realm, but they are adopting the cultures of self-expression and self-promotion in a way that sometimes deviates from organizational and institutional principles” (Nenadić, 2020, p. 142). Her research also reviewed the availability of social media guidelines for journalists in the country to navigate their social media use from a professional perspective. Most media organizations in Croatia, if they have them, do not make their social media guidelines public. The guidelines provided by the public service media to their journalists in 2013 framed social media primarily as a risk and focused more on setting the boundaries to journalists’ social media use (Nenadić, 2020). The HND has a general Code of Ethics but no specific social media guidelines.

Recent study among journalism students found that the most valued journalism roles in Croatia are those of a detached observer and the watchdog role, which is perceived as more important than giving commentary and opinion (Pjesivac & Imre, 2018, p. 13). Worlds of journalism research found that “reporting things as they are” is the highest appreciated value in Croatia (Andersen et al., 2017; Peruško et al., 2016).

4. Risks and Opportunities in the Media Usage Domain

4.1. Development and Agency of Change

Structure aspects of media use have a powerful effect on agency (Peruško et al., 2015). We can see that many changes in audience preferences are a result of the transformations from the structural level (liberalization of the media market in early 2000s, and digital transformation from late 2000s / early 2010s, which changed the supply of media and access to media content). There are several longitudinal trends which can be noticed from our literature review: decline of the public television audience shares, decline of newspaper audiences, rise of online news media audiences (both online editions of newspapers, and digital born media), a rising access to news through social media platforms as intermediaries, and a trend of news avoidance and emergence of “minimal” news users.

Commercialization and liberalization of the media market, internationalization of ownership in the media, digitalization of transmission and production in the media together with increasing access to fixed and mobile online services, as well as the rise of the media platforms, have all influenced the new media affordances of Croatian citizens. These trends have been shaped by national and international policies by governments and tech corporations. Research shows that the structural framework in individual countries influences media usage patterns (Peruško et al., 2015), but the agency also exists at the level of media users – everyday media use by individual citizens is also shaped by their individual or collective traits, within the context of their media system framework. Their collective media / genre choices impact media programming and thus individual agency is made visible.

4.2. Agency of Media-Users and Analysts

Croatia has four media generations that differ according to media use: the largest group consists of the traditional media users, followed by digital immigrants, digital users who read newspapers, and digital users who avoid newspapers (Čuvalo & Peruško, 2017). Digital immigrants have the broadest news repertoire and prefer reading newspapers both in print form and on the computer, while digital users prefer to read them via mobile phone. Higher education is correlated with belonging to the digital immigrant and digital users who read newspaper. Highest share of traditionalists can be found among those born in 1960s and before, digital immigrants among those born in 1970s, while highest share of digital users belong to millennials and generation Z born in the late 1980s and later (Čuvalo & Peruško, 2017).

Gender is shown to be important in determining preferences for television channels with sports programs, and older audiences prefer public television channels (AEM, 2013). The analysis of characteristics of young television audiences in Croatia found that cultural capital divides audiences based on their television preferences into those preferring domestic spectacle television genres – those with lower cultural capital prefer domestic programs and lighter entertainment), while those with higher cultural capital prefer foreign fiction (Krolo et al., 2020).

Media use of children is especially studied as a vulnerable group, especially regarding their online behavior. Other social groups that might be at risk for exclusion – the elderly, homeless, less educated, or rural populations – have only been sparsely studied regarding their media use habits (a recent study that investigated the digital exclusion of the rural population has not yet been published and is thus not included here).

4.3. Access to News and Other Media Content

The consequences of the liberalization of the media market were multifaceted. First, the supply side of the media market was diversified, with larger number of brands offered both on the electronic and digital media market (Peruško, 2012; Roller, 2014). The diversification and the structure of the media market is described in detail in the Journalism domain. Although the neo-television age came later in the post-socialist context in 2000s, it offered diversification of television programs and genres (Peruško & Čuvalo, 2014). However, the largest diversity of programs and genres could be found in the public television, since private television channels offered mostly entertainment and fiction content (Peruško & Čuvalo, 2014). The social inclusiveness of the media is evaluated as lagging, especially in the women's access to media (Bilić et al., 2021). Croatian public service media are obliged by law to produce content for minorities, however, "media access in practice is reserved to ghetto-like broadcasts in the least popular program slots poorly visible to the general public" (Bilić et al., 2021, p. 13).

Second, these changes influenced the position of the public service HRT, especially its television division, which now for the first time had to compete with commercial television channels. Despite the higher number of media outlets and increased supply of digital media, television still holds the highest position among audiences in Croatia (AEM, 2016; Car & Andrijašević, 2012; Vozab & Peruško, 2021). Although younger digital audiences follow television less, it is still important in their media repertoires (Čuvalo & Peruško, 2017). Television is still mostly viewed linearly on the traditional television set at home (AEM, 2016; European Commission, 2021b). From 2000 to 2010, Croatian public television channels attracted largest shares of audiences. In 2002, three public television channels had an 87,1% audience share, and in 2010 first public television channel still had the highest audience share (26,9% as opposed to second most popular private television channel Nova TV with 23,2%) (Peruško, 2012). This position changed in 2011 when Nova TV took the first place in audience share, and the viewership of Croatian public television since then has been either in the stagnation or decline. Since then,

Nova TV had consistently held the first position in prime-time audience share (AEM, 2013, 2016; Vozab & Peruško, 2021). In 2012, HRT 1 (first public television channel) still held the second position which was shortly after overtaken by RTL, and HRT 1 is now holding the third place in viewership (AEM, 2013, 2016; Vozab & Peruško, 2021).

Third, despite of diversification of channels, programs and genres, the amount of content in public interest has been in decline (e.g., news and information, science and education, culture) (Peruško & Čuvalo, 2014). In the early 2000s, while Croatian public television didn't have stronger competition from private television broadcasters, the most aired genres on its three channels were film and television series (34%), news and information programs (19%), sport (12%) and entertainment (10%) (Peruško, 2005, p. 457). Educational, children's and youth programs were each represented by 6% (Peruško, 2005, p. 457). New private television channels mostly offered entertainment and fiction programs, so content in public interest had a smaller share in the total broadcasted television content (Peruško, 2009; Peruško & Čuvalo, 2014). In 2000s, public television had a higher diversity of programs and genres, higher share of content in public interest and higher share of news and information programs in comparison to commercial televisions with national coverage (Peruško, 2009). From 2005 to 2009 on all television channels combined, the most aired programs and genres were news, comedy, children's programs, and drama (Peruško, 2009). In 2009, a sharp rise of light entertainment programs like reality television were noted (Peruško & Čuvalo, 2014). Television genres with highest shares on Croatian television channels in 2016 were film (14%), reality television (13%), and comedy (11%). Cultural programs were represented with only 1%, current affairs 4%, documentary 5%, and news with 9% (Peruško et al., 2021).

Table 2: Audiences of the most popular terrestrial television channels with national coverage in 2016 (population over 4, share %)

	Nova TV	HTV 1	RTL	HTV 2	Doma TV	RTL 2	HTV 4	RTL Kockica	HTV 3
All day share %	22,9	15,4	13,2	8,1	5,4	5,3	3,7	3,4	2
Prime time share %	31,8	12,4	15,5	7,9	5,9	4,8	1,7	2,3	1,4

	All day share %	Prime time share %
United Media Group (BC Partners) (Nova TV, Doma TV)	28,3	37,7
HRT (public service) (HTV 1, 2, 3, 4)	29,2	23,4
Central European Media Enterprises (PPF) (RTL, RTL 2, RTL Kockica)	21,9	22,6

Source: adapted from Agencija za elektroničke medije (AEM, 2016)

Besides digital terrestrial channels, Croatian audiences follow channels available through IPTV and cable providers. Some of the most popular are news channels N1 television (regional affiliate of the CNN for the Southeast Europe, operating from 2014) and Al Jazeera Balkans established in 2011 in Sarajevo (as part of the Qatari owned and financed Al Jazeera Media Network). DNR shows that N1 had 11% of digital news audiences in 2017, which rose to 19% in 2021 (those who watched it at least once a week, Peruško, 2017; Vozab & Peruško, 2021). Al Jazeera Balkans had around 10% of digital audiences from 2017 to 2020 (Peruško, 2017, 2020).

Radio audiences decreased from 68,4% in 2002 to 65,4% in 2006, and to 49,8% in 2010 (Mučalo, 2010, p. 81).³² Still, radio has a prominent position in Croatian media use (Peruško et al., 2017b), although it is often excluded from the media audience analysis (Mučalo, 2010). There are several radio stations on the list of the 15 most popular traditional sources of news in 2021 (Otvoreni radio, Narodni radio, Radio Antena, and local radio stations in general) (Vozab & Peruško, 2021). Survey from 2013 found that almost 50% of young audiences were daily radio listeners, mostly via the radio set, and mostly listening to music (77%) (Mučalo & Knežević, 2014). Radio is an important source of news and a part of different news repertoires (Peruško et al., 2017b). However, the problem with available research on radio audiences is that it was mostly focused on traditional use of radio, and not on its nonlinear forms, like online streaming. There are fewer radio listeners among digital generations, but these generations are also more likely to listen to radio on their mobile phones (Čuvalo & Peruško, 2017). There is a rising popularity of podcasts in Croatia – 39,3 % of audiences listened to podcasts in 2020, and the share rose to 42,4% in 2021 (Vozab & Peruško, 2021). Most popular themes of podcasts in Croatia are lifestyle, specialist themes (e.g. science, health, business), and news, politics, and international events (Vozab & Peruško, 2021).

Croatia has characteristics of polarized pluralist media system model, so newspaper readership has never been very high (Peruško, 2012). However, newspaper market has been in stark decline, and newspaper audiences are increasingly turning to online editions of newspapers (Vozab, 2014). Available data show a noted drop in daily newspaper readership from 2005 to 2010 (Car & Andrijašević, 2012, p. 22). In the five-year period from 2008 to 2013, daily newspaper circulation has dropped for 53% (Vozab, 2014). However, in a survey from 2014, 58% of audiences listed newspapers a source of news which they follow at least once a week (Vozab, 2014). The decline in newspaper circulation is continued from 2013, and for example, circulation has dropped for another 19% from 2019 to 2020 (AZTN, 2016, 2021). Reuters DNR (Newman et al., 2020) finds that newspapers are with time less popular as sources of news (6,1% of digital audiences preferred newspapers as sources of news in 2017, and 5,6% in 2020, and a large drop to 3,6% was noted in 2021) (Vozab & Peruško, 2021). Large drops in circulation from 2019 to 2020 and in interest in newspapers as sources of news in 2021 could be also ascribed to the COVID-19 pandemic, when newspaper readership fell due to lockdowns.

³² Although data for 2002 and 2006 come from different source than data for 2010, so the difference might be also caused by difference in methodology.

Alongside the declining newspaper readership, online audiences are on the rise. Households are with time more equipped with ICT – in 2005, 30,1% of households had a personal computer, in 2010, 60%, in 2015, 77%, which is a share which stayed until 2022 (DZS, 2008, 2011, 2015, 2020). Mobile phones are the most used communication technology, and already in 2010 the penetration was 139,57% (Car & Andrijašević, 2012). In 2017, access to news and information was fourth most common use of the Internet (64,6% of Internet users, after e-mail communication, search for useful information, and instant messaging) (Bilić et al., 2017). The five largest daily newspapers which have had a declining circulation (*24sata*, *Večernji list*, *Jutarnji list*, *Slobodna Dalmacija*, *Novi list*), and had a sharp rise in audience share of their online outlets from 2008 to 2013 (Vozab, 2014). Online editions of newspapers are now on the second place as a preferred source of news, after television (Vozab & Peruško, 2021, p. 16). Most popular online news sites are 24sata.hr (online edition of a daily tabloid), Index.hr (digital born new site), jutarnji.hr, večernji.hr (online editions of daily newspapers), dnevnik.hr, rtl.hr (owned by private television networks), net.hr, tportal.hr (not necessarily always in the same order, depending on the measurement, see Bilić et al., 2017; Vozab & Peruško, 2021).

Despite channels diversification after 2000, the amount of content in public interest has been in decline (e.g., news and information, science and education, and culture) (Peruško & Čuvalo, 2014). In the early 2000s, while Croatian public television didn't have stronger competition from private television broadcasters, the most aired genres on its three channels were film and television series (34%), news and information programs (19%), sport (12%), and entertainment (10%) (Peruško, 2005, p. 457). Educational, children's and youth programs were each represented by 6% (Peruško, 2005, p. 457). New private television channels mostly offered entertainment and fiction programs, so content in public interest had a smaller share in the total broadcasted television content (Peruško, 2009; Peruško & Čuvalo, 2014). In 2000s, public television had a higher diversity of programs and genres, higher share of content in public interest and higher share of news and information programs in comparison to commercial televisions with national coverage (Peruško, 2009). From 2005 to 2009, on all television channels combined, the most aired programs and genres were news, comedy, children's programs, and drama (Peruško, 2009). In 2009 a sharp rise of light entertainment programs like reality television were noted (Peruško & Čuvalo, 2014). Television genres with highest shares on Croatian television channels in 2016 were film (14%), reality television (13%) and comedy (11%). Cultural programs were represented with only 1%, current affairs 4%, documentary 5%, and news with 9% (Peruško et al., 2021).

A recent audience survey shows a wish for more films and documentaries offered on television (AEM, 2016), while some earlier studies also confirm a lack of informational programs (Peruško, 2009; Roller, 2014). Overall audience satisfaction with the offer of free access television content is low (AEM, 2016). In 2009, the share of news and information programs on radio was 14,8% (Car & Andrijašević, 2012, p. 23) the digital media market, despite large number of different media outlets, most of them target national-level audiences, and cover traditional, general themes (Bilić et al., 2017, p. 21).

Digital transformation changed the audience access to media content, starting in the end of 2000s. In the digital era, the digital media market dimension becomes increasingly important as orientation of the media markets shift from print media to diversified digital and hybrid media (Mattoni & Ceccobelli, 2018; Peruško et al., 2015). Internet use has risen significantly, from 63% in 2012, to 82% in 2021; and individuals use Internet increasingly to access social media sites only 38% used Internet for that purpose in 2013, while 61% used it in 2021 (Eurostat, 2021). Although the Internet access and use are consistently rising in Croatia, it is still below the EU average. According to Digital Economy and Society Index for 2021, Croatia is in the 19th place, below the EU average (European Commission, 2021a). However, the position of Croatia according to this index has improved from 2016 to 2021. Croatia is performing below average in con-

nectivity and digital public services, while it is around the EU average in human capital (digital skills) and the integration of the digital technology (European Commission, 2021a). Croatia holds a high position in using Internet for reading news media - in 2016, it was in the second place in EU, with 90,6% of Internet users reading news media online (Bilić et al., 2017, p. 7).

Audiences in Croatia access online media directly but increasingly also through intermediaries, such as search engines and social media (Bilić et al., 2017; Vozab & Peruško, 2021). The preferred way of news access diverges between different age groups. Audiences in younger age groups prefer social media as an intermediary of access to online news, while those in older age groups prefer to access news directly on the web page of the media outlets (Vozab & Peruško, 2021). Younger audiences also prefer visual content and instant messaging, while older audiences more often seek textual news (Bilić et al., 2017, p. 29). Audiences do not express readiness to pay for the online media content; survey from 2017 found that 16,4% of Internet users pay for online media content (Bilić et al., 2017, p. 22), while only around 8% of digital news audiences pay for online news (Vozab & Peruško, 2021).

In 2021, Facebook, YouTube and WhatsApp are the most popular social media platforms, both for general purpose and for accessing the news (Vozab & Peruško, 2021). Most of the Facebook and YouTube users stated that they access news inadvertently, while looking for something else on these platforms (Vozab & Peruško, 2021, p. 38). Although there are not that many Twitter users (13% of digital news audiences in 2021), a large share of them uses it for seeking news and information (Vozab & Peruško, 2021, p. 38). Facebook and Twitter users give the most attention to mainstream media and journalists when consuming social media content, in comparison to users of other social media platforms (Vozab & Peruško, 2021, p. 38).

Most popular social media in Croatia is Facebook (85,2% of Internet users uses it at least once a week), Instagram (28,6%), and LinkedIn (13,9%) (Bilić et al., 2017, p. 35). All other social media are used by less than 10% of Internet users (Bilić et al., 2017).

4.4. Relevance of News Media

Characteristics of media markets are, by Hallin and Mancini (2004), defined also by the position of quality media in the market. In Croatia, tabloid *24sata* is the one with the highest circulation but followed with non-tabloid *Večernji list* and *Jutarnji list* (Vozab, 2014). Digital news audiences also rate *24sata* as the most frequent source of print news (Vozab & Peruško, 2021). Most of the mainstream media have a commercial orientation and “attract audiences of different political orientation in a ‘catch all’ manner” (Peruško et al., 2021, p. 170). All four public television channels in Croatia are evaluated by the surveyed audiences as “worse” than commercial television channels (AEM, 2016). Television programs and genres with highest audience preferences are films, documentaries, news and information program, and music programs, while the least preferred programs are children television and reality shows (AEM, 2016). Documentary and news and information programs are evaluated by audiences as programs with highest quality, while reality television and soap operas as lowest quality genres (AEM, 2016).

Online environment and lower entry costs have enabled lower quality outlets, which also publish misinformation, to emerge (Peruško & Vozab, 2017). However, their reach is limited. On the opposite end, some quality brands like Telegram.hr also emerged in the digital media market (Telegram.hr was eight most popular news source for the digital news audiences in 2021, Vozab & Peruško, 2021). Leading digital media outlet Index.hr, perceived as left-leaning, is not among the ten most trusted news sources, but is at same time seen as the most important online news source and is considered as being independent from political influence (Peruško et al., 2021; Vozab, 2017; Vozab & Peruško, 2021).

Most of the research about the relevance of news media point to the polarized-pluralist media system in terms of the characteristics of news audiences. There is a noted socio-economic and gender gap in news consumption, and news audiences are divided along the lines of their political affiliation. There are scarcer sources for the description of news relevance before 2010. Analysis of socio-demographic predictors of news use found that men and older age groups are more frequent users of news (Mataušić & Rimac, 2000). Analysis of press audiences based on a panel study from 1998 and 2002 found that they are more likely male, younger, more educated and with higher income (Lamza Posavec & Rihtar, 2003). Similar profile of newspaper audiences was confirmed in a study from 2009 – they have a higher socio-economic status and inform themselves more often (Čuvalo, 2010). Among the newspaper readers there is a divide between older audiences with lower socio-economic status, with more rural background who usually vote for the right-wing parties, and younger, urban audiences with higher socioeconomic status, who usually vote for left-wing parties (Lamza Posavec & Rihtar, 2003). While still present (Čuvalo & Peruško, 2017), the gender gap in news consumption seems to be less pronounced in recent years (Vozab, 2019a, 2019b). In the multimedia environment, the socio-economic divide remained, and generational divide became more important. Socio-economic status shifted to distinguish between internationally oriented omnivore news users, who have a higher socio-economic status and political interest; and news avoiders, with poor news media diet, who are older, with lower socio-economic status and lower political interest (Vozab, 2019a).

Television and online news are the most popular source of news and information programs, followed by radio and newspapers (AEM, 2013; Peruško et al., 2017a; Vozab & Peruško, 2021). As Croatia was slower in liberalizing its television market fully, public television was attracting significantly larger share of audiences in early 2000s (Peruško, 2005, 2012). HTV held the highest television audience share until 2010 (Milosavljević & Broughton Micova, 2013) despite the commercial competition and decreasing public trust. In the third decade HRT is steadily in the third place as the source of news for the Croatian public, behind two major commercial broadcasters. Its audiences self-identify with more conservative or right-wing political views, and its editorial policy is perceived as government friendly (Peruško, 2019; Vozab & Peruško, 2017, 2021).

Gradual increase in Internet use from 2017 to 2021 was not followed by an increase in digital news use, news interest or trust in news (Vozab & Peruško, 2021). Internet users in Croatia express the highest interest in news about local events and politics, then about health and diet, and news about science and technology are on the third place (Bilić et al., 2017, p. 30). Recent research shows that phenomena associated with “high-choice” media environments is present also in Croatia. In 2017, Croatia was third in news avoidance, after Turkey and Greece, as 50% of Croatian audiences stated they often or sometimes avoid news (Kalogeropoulos, 2017). “Minimalist” users with low use of news sources are the most common group of users in Croatia, followed by traditional news users (Vozab, 2019a, 2020b). Younger generations are more often “minimalists” or “social and commercial media users” when it comes to news repertoires, while middle and older generations news repertoires consist of digital news media and traditional media (Vozab, 2019b). Around quarter of audiences follow community or civil society media: these audiences differ from the average media user by higher news interest, political engagement, and use a wider array of news sources (Vozab et al., 2017).

A strand of research dealt with the correlation between news consumption and attitudes towards democracy, political attitudes, and participation. Research from early 2000s found correlations between higher media and news consumption and higher trust and acceptance of government (Mataušić & Rimac, 2000; Rihtar et al., 2000). As this was a period when media market was still not fully liberalized and state media did not finish its transition to public service media, media effects might have been in cultivating pro-government attitudes. For example, analysis of

cultivation effects of television found that heavier television viewers perceived the then ruling HDZ party more favorable (Rihtar et al., 2000).

Similar conclusions, which correlate democratic values and engagement with news consumption, are also confirmed in more recent research. Higher news consumption was found to be correlated to higher digital participation (Vozab, 2019a). Higher news consumption, especially with a focus on community and civil society media, has a positive correlation with political interest, efficacy, and engagement (Vozab et al., 2017). Although public service media in many media systems positively influence interest in politics, political knowledge, and mitigate the extent of news avoidance, in Croatia there is no link found between use of public service media and democratic engagement (Vozab, 2019a). In fact, it seems that public television in Croatia sits on the right side of the rather polarized media system, catering for the conservative audiences (Vozab & Peruško, 2017). Analysis of usage of different information sources and post-electoral expectations found a greater diversity of media effects on political attitudes (Vozab & Peruško, 2018). There is a link between different main sources of political information and political values – online news consumption is predominantly linked to liberal values, and interpersonal discussion as the main sources of political information is linked to conservative values (Vozab & Peruško, 2018). Political leanings are confirmed to influence media choice in young people in Croatia as well (Plenković, 2020).

4.5. Trust in Media

Two early studies showed that the public perception of the quality of the media worsened from 2005 to 2006 in all aspects except one, i.e., the openness of the media to diverse and plural views (Peruško, 2005, 2006). Media autonomy and independence was seen to have been reduced, together with the journalistic professionalism. Some 30 % of the respondents to audience survey did not at that time accept media freedom as a value – they thought that some media should be shut down, that a body should watch over statements contrary to public interest, that public opinion contrary to the majority should be suppressed, etc. Although this was alarming, the acceptance of media openness was the highest in comparison to other social sectors studied and increased with higher level of education and lower age group (Peruško, 2006).

Media and journalists are not highly trusted in Croatia. In 2009, they were in the seventh and eighth place below several other institutions in terms of trust (like Catholic church, the army, educational institutions, science, and leaders of the preferred parties) (Car & Andrijašević, 2012, p. 15)³³. Most trusted media platforms in 2009 were Internet (45%), then radio (39%) and television (34%) (Car & Andrijašević, 2012, p. 15). Radio was in 2009 the most trusted medium among traditional media when it came to reporting news and politics, followed by Internet (Car, 2010; Mučalo, 2010).

Although Internet was the most trusted media platform in 2009, its position seems to have changed during time. A survey from 2017 found that 60,6% of respondents do not believe in the accuracy of information in the online media (Bilić et al., 2017). Audiences perceive online media to be filled with sensationalist reporting, having too many ads, lacking analysis, unreliable information which is not factchecked, and filled with typos (Bilić et al., 2017). On the list of the most trusted media in 2020 and 2021, first seven places are occupied by traditional media (private television channels Nova TV and RTL are on the first place, and Otvoreni radio in the third) (Vozab & Peruško, 2021).

³³ Igor Kanižaj and Davor Mezulić also speak of a loss of trust in journalists (October 2022, contribution in interviews).

Data from 2017 to 2021 about digital news audiences show that the overall trust in media didn't significantly change over time, although there was a slight rise in trust in media in 2021, probably due to increased reliance on the media for the COVID-19 related news (Vozab & Peruško, 2021).

Earlier research on news consumption found that higher news consumption is correlated to higher trust in parliament and more favourable evaluation of government (Mataušić & Rimac, 2000). In 2009, television use was positively correlated to trust in many of the political and social institutions, while Internet use was negatively correlated to trust in politics, government, and elites (Čuvalo, 2010, 2013), in line with the comparative findings of Norris and Inglehart (2009) that media use for information purposes (including television, Internet, radio and press) consistently linked with higher citizen participation, modernization of social values, and tolerance. Research from 2000s also suggests that the media were not completely perceived as independent institutions, as trust in media overlaps with trust in other institutions rather than forming a separate dimension (Čuvalo, 2010, 2013; Mataušić & Rimac, 2000).

There is a noted concern about disinformation online – in 2021, 61,1% of audiences expressed concern over the amount of the misinformation (Vozab & Peruško, 2021). Paradoxically, although trust in media rose during the COVID-19 pandemic, the concern over disinformation rose as well (Vozab & Peruško, 2021). Croatian audiences express higher distrust towards media and professional journalism (and perceive them more as sources of misinformation) than average of global digital news audiences (Vozab & Peruško, 2021).

5. Risks and Opportunities in the Media Related Competencies Domain

5.1. Development and Agency of Change

Following the EU agenda, media literacy became one of the key areas of the audio-visual media regulatory bodies across the continent, including Croatia. AEM is the main funder of various media literacy activities undertaken by civil society organizations in cooperation with UNICEF and educational institutions, and the successful Media Literacy Days are just one of the results of this cooperation. The EU and other foreign actors seem to provide more support for the area development than national political elites, as Croatia still has not adopted a comprehensive or coordinated media literacy policy with measurable goals and objectives. The key risks in this are driven by the bottom-up initiatives and not by a comprehensive policy is that some already excluded and vulnerable groups, such as elderly and those without access to technology may remain outside the existing streams of media literacy building activities. Recent support by the Ministry of Science and Education and the Central State Office of Demography and Youth might speak to a future greater involvement of state bodies.³⁴

5.2. Overview of Media Related Competencies in Policy Documents

Croatia is one of the few countries in the EU which in 2017 still did not have any media literacy policy (Cernison & Ostling, 2017). In 2021 Media Pluralism Monitor report, it is evaluated that Croatia is in high risk in the media literacy indicator (Bilić et al., 2021). Croatia is ranked rather low on the media literacy, in the third cluster out of five clusters of European countries, and this position remained largely unchanged from 2017 to 2021 (Lessenski, 2017, 2021). Media literacy in Croatia has had a sporadic development, mostly stemming from bottom-up initiatives from civil society and initiatives between NGOs and different public and educational institutions.

³⁴ Igor Kanižaj (October 2022, contribution in interview).

Policy development is slow, and there is weak sustainable institutional support on the national level. For this reason, it is difficult to pinpoint critical junctures in the development of media social context of media related competencies.

In legislation regulating media in Croatia, media literacy is mentioned for the first time in the Electronic Media Act from 2009, where promotion of media literacy is listed as a goal of the Council for Electronic Media and as one of the criteria for receiving subsidies from the Fund for the Promotion and Protection of Pluralism and Diversity (Kanižaj & Car, 2015). It is also mentioned in the HRT Act, where promotion of media literacy is listed as one of the public service media programmatic goals (Kanižaj & Car, 2015). In the newest Electronic Media Act, media content is defined as being in the public interest if it promotes media literacy; the Council for Electronic Media is tasked with the media literacy promotion; the AEM is advised to allocate funds for the promotion and protection of pluralism and diversity to projects which promote media literacy; and video sharing platforms are to take measures and develop tools for the media literacy development.

Media literacy has not been a priority in education policy, and the term is for the first time only briefly mentioned in the Strategy for Education, Science, and Technology, ratified by Croatian Parliament in 2014 (Kanižaj & Car, 2015). There is a wide public acceptance of the higher inclusion of media literacy in the formal educational system (Ciboci et al., 2015). Education reform named “School for Life” promised a greater inclusion of media literacy in the formal educational system. As a part of the reform, since 2019, the curricula of elementary and high schools in Croatia contain an inter-subject theme “Usage of Information and Communication Technology”.

5.3. Media Literacy Programs in Formal and / or in Non-Formal Education

Media literacy program has so far been provided in formal education program as media culture in curricula of Croatian Language and Culture since 1970s (Kanižaj, 2019). Some aspects of digital literacy are covered in computer classes. In the curriculum of Croatian Language and Culture the focus is on building competencies for interacting with media like “theatre, film, radio, press, comic books, computers, reception of theatre plays, films, radio and television shows, and gaining competencies for evaluation of radio and television shows and films” (Ministry of Science and Education, 2006, in Alerić et al., 2019, p. 54). The new proposal for the National Curriculum for the Croatian Language from 2017 suggests a more comprehensive approach to inclusion of media literacy in the education program (Alerić et al., 2019). For example, it is emphasized that media culture domain should emphasize a critical approach to media content, understanding of media effects, different communication competencies and competencies to produce media content, cultural and intercultural understanding, and understanding of different opinions and ideas (Alerić et al., 2019, p. 55).

However, the formal media literacy education program has been evaluated as outdated (Ciboci, 2018; Ciboci & Labaš, 2019), educators have not been equipped with competencies for media literacy teaching through their formal education, and teaching material has not been sufficiently developed (Ciboci & Osmančević, 2015; Kanižaj, 2019). Media literacy is somewhat covered and discussed as the part of the teachers professional training, but overall, it is not highly represented as a topic (Vanek, 2021). Survey with the principals and teachers in schools found that they are unsatisfied with the development of media education, and that they perceive themselves as lacking knowledge about media (Alerić et al., 2019; Ciboci et al., 2019; Kanižaj, 2019). Moreover, many principles don't recognize media literacy as an important issue which should be covered in the educational system (Ciboci et al., 2019). Media culture as a part of the Croatian Language and curricula is evaluated as not encouraging critical thinking, nor does it deal at great length with digital media (Ciboci & Labaš, 2019). As a part of the experimental curriculum reform, the computer classes became more available and updated, so students now learn about issues

including security and digital reputation, data protection, violence, and other forms of inappropriate behavior and how to protect from such content (Ciboci & Labaš, 2019). An inter-subject theme “Usage of Information and Communication Technology” introduced in 2019 sets a goal for students to develop digital literacy skills of “creative, efficient and responsible use of digital technology, by practicing communication skills and developing competencies for cooperation” in four domains: functional and responsible use of ICT, communication and cooperation in digital environment, research and critical thinking in digital environment, and creativity and innovation in the digital environment. Competencies to produce media content are for now not developed systematically in the education system. Schools which encourage creativity through participation in school newspapers or magazines, school radio or journalism groups, and workshops promote these competencies, but this is not equally developed through the education system (Kanižaj & Car, 2015).

Higher education institutions also cooperate in media literacy projects, promotion, and develop media literacy education. Faculty of Political Science of the University of Zagreb provides an opportunity for journalism students to create media content in student media (Televizija Student, Radio Student, newspaper *Global*), and to create educational material for the media literacy promotion. Media literacy is taught through several courses at the Faculty of Teacher Education of the University of Zagreb. The Academy of Dramatic Arts of the University of Zagreb offers courses about media content production (Kanižaj, 2019).

Besides formal education system, media literacy has been promoted by other public institutions and different civil society organizations. For example, the AEM, in partnership with higher education institutions and NGOs, has been engaged more extensively in the promotion of media literacy through financial support for media literacy projects, public campaigns, and development of different education materials. The AEM in collaboration with UNICEF annually organizes Media Literacy Days, when media literacy is promoted through various events like conferences or educational activities (in 2021, 4th edition of Media Literacy Days was held). Publications, educational and promotional material are regularly published on a special multimedia webpage³⁵ dedicated to media literacy, which was highlighted as one of the best media literacy projects in the 2010–2016 period by the European Audiovisual Observatory.³⁶

Croatian Research and Education Network (CARNET) (<https://www.carnet.hr/en/>) has been promoting digitalization of activities and resources for elementary and high school education (Kanižaj & Car, 2015). It was also involved in educating teachers and in promotion of digital literacy among elementary and high school teachers (Kanižaj & Car, 2015). Public libraries are also important institutions in the media literacy promotion in Croatia (Kanižaj & Car, 2015; Unić et al., 2014). Other public or civil society institutions involved in media literacy promotion are Education and Teacher Training Agency (AZZO), Croatian Film Association (HFS), and Ombudsman for Children (Kanižaj, 2019).

5.4. Actors and Agents of Media Related Competencies: Risks and Opportunities

The most active agents of the media literacy development in Croatia have been civil society organizations and initiatives which often collaborate with other institutions (Kanižaj, 2016). According to Kanižaj’s (2016) mapping of media literacy projects, most of them were addressing media literacy skills related to critical thinking, media use, intercultural dialogue, and creativity. As policy development of media literacy is lacking, and there is a weak and unsustainable insti-

³⁵ This project was launched by UNICEF, AEM, Croatian Film Association, Croatian Audiovisual Centre, Faculty of Political Science and Academy of Dramatic Arts, <https://www.medijskapismenost.hr/>.

³⁶ Nada Zgrabljić Rotar (October 2022, contribution in interview).

tutional support on the national level, media literacy activities and projects are mostly offered in the more developed urban centers in Croatia, mostly in the capital city of Zagreb (Bilić et al., 2017). In general, the development of media literacy in the country is largely linked to formal education and most activities and trainings aimed at advancing media literacy skills are designed for younger generations (school population).

5.5 Assessment of Media Related Competencies Among Citizens

Research in Croatia is mostly focused on the use of media and media technology by children and youth. In terms of media literacy dimensions (access and retrieval, understanding and evaluation, and creation and utilization), Croatian researchers have mostly focused on the first component of access and retrieval (UNESCO, 2013).

In 2000s, a series of sociological studies were done by the Institute for Social Research in Zagreb. In the book by Ilišin et al. (2001), different authors analyze the use of communication technology in family, and how do children use media in everyday life. Interpersonal communication is the most frequent type of spending free time among children and youth from early 2000s until present (Ciboci et al., 2020; Ilišin et al., 2001). However, media use is an important part of free time among children. In early 2000s the most preferred media was television, radio, children and youth magazines, and computer on the last place, while the most common functionalities of media use were entertainment (Ilišin et al., 2001). Media content is predominantly discussed with peers, and rarely with parents, so media use is influenced by peer and social environment rather than family (Ilišin, 2005; Ilišin et al., 2001). For the “laissez faire” parental approach and a lack of development of media literacy in the educational system, it is mostly driven to entertainment rather than educational function (Ilišin et al., 2001).

A rare analysis of digital divide, based on survey data collected in 2004, found that education, income, and age are the strongest predictors of Internet access and use (Krištofić, 2007). Digital divide is also noticed among urban and rural regions, and there is a gap between the capital city Zagreb and the rest of Croatia in access to ICT in 2000s (Potočnik, 2006). Urban youth in 2000s used ICT the mostly for writing, Internet access, games, and learning (Potočnik, 2006). In first half of 2000s, Internet was used by young users for surfing, communication with others and information seeking (Potočnik, 2006).

One of the rare studies which measured all three components of media literacy found that children and young users have rich media use practice but are weaker in critical thinking and production of media content (Ciboci, 2018). Similar conclusions could be drawn from the digital literacy research, as students have no problems with access and use of digital technology but lack digital skills and informational literacy (Mikelić Preradović et al., 2016). This could be interpreted as a result of lacking media literacy policies, inadequate integration in the education system and a lack of communication about media use in family.

In Croatia, around 50 % of citizens have basic or above basic digital skills (53 % in 2021), which is slightly below the EU average (58 % in 2021) (Eurostat, 2021).

There is a lack of research and data pointing to the privacy and data protection skills. The only sources we could find are the Eurostat report about digital rights (European Commission, 2021b), Croatian report from the “EU Kids Online” project (Ciboci et al., 2020), analysis of Facebook use by parents (Grmuša et al., 2019), and an evaluation of a pilot curriculum for e-safety in elementary schools (Kralj, 2016).

Croatian citizens are worried the most about the safety and well-being of children when it comes to digital tools and Internet (65%). After this issue, most of the citizens are worried about the difficulty of disconnecting and finding a good online / offline life balance (44%),

cyberattacks and cybercrime (e.g., theft of personal data) (41%), and use of personal data and information by companies or public institutions (38%). They are worried about the difficulty of learning new digital skills to take an active part in society more than the EU average (33%). 40% of respondents in Croatia were not aware that the rights that apply offline should also be respected online, and 78% believe it would be useful to know more about their rights in the online environment. 87% of respondents (less than European average) think that everyone should have access to education and training for acquiring digital skills, and 85% believe it would be important to have education in critical thinking while navigating Internet (European Commission, 2021a).

Croatian research about privacy and data protection skills has focused on children, young users, and parents. Croatian report from the “*EU Kids Online*” project (Ciboci et al., 2020) found that most of the children and young users of Internet didn’t experience stronger privacy or data protection issues – 1,7% had an experience that someone used their personal data in a way they didn’t like, 1,1% had an experience of someone creating an online content about them which was offensive or disturbing, and 5% had an experience of identity theft (someone using their online password). However, 10,9% of children and young Internet users had an experience when their parents or guardians posting information about them online without consent. In the analysis of use of Facebook by parents, Grmuša et al. (2019) found that many parents are unaware of the risks of social media communication and lack protection skills (e.g, from misuse of personal data, and the protection of identity).

This area of research is very limited and certainly points to a risk in media usage practices. There is no research relating to cognitive abilities in relation to media usage practices.

6. Analytical Conclusions: Risks and Opportunities Related to Changes in All Four Domains

6.1. Risks and Opportunities in the Legal and Ethical, Journalism, Media Usage, and Media Related Competencies Domain

In the *Legal and ethical domain*, we focus on two areas: freedom of expression and freedom of information. The freedom of expression is legally recognized and constitutionally protected, and the restrictions on pursue legitimate aims. Legal scholars argued that in some instances the proportionally or balance between the protection of personal rights and freedom of expression were inappropriately on the side of personal rights. Defamation incriminations are included in the Criminal Code, the Act on Misdemeanors against Public Order and Peace, and in the Media Act, and sometimes contradictory. Recent practice of use of the Misdemeanours Act to sue journalists based on their texts or platform content for insult or disturbing the peace can be seen as a risk to freedom of expression. Journalists are also exposed to many SLAPP lawsuits by public figures regarding libel (and shaming before it was removed) from the Criminal Code as well as in civil suits seeking large damages, and this can also be seen to present a risk. While defamation is still a part of the Criminal Code, the penalty can only be financial. Truth and public interest are a defense also for journalists.

Countering disinformation in the online and the offline is mostly related to the Misdemeanours Act, where the authors of challenged statements must prove them truthful; a new Electronic Media Act puts the onus on the publishers to remove audio-visual content including hate speech or incitement to violence from its sites.

The GDPR has not been implemented with exemptions for journalistic work, and this can present a risk for the possibility of journalists to inform the public. Croatia transposed the EU Copy-

right directive, and the usual public interest exemptions to copyright apply. This topic has not engaged academic debate so far.

Access to information and freedom of information is also protected in media legislation and in the Constitution, as well in special legislation with a special enforcement body in place. The public bodies are not eager to comply, but the number of citizens and journalist complaints attest to the rising consciousness of the right. Most denials of public information were explained incorrectly by the GDPR, and this might be seen as a risk.

Journalists have the right to protect their sources, and no infringement has been seen in this respect. While whistleblowers are protected by law, in practice they suffer negative consequences. The topic has not been analysed in relation to the media. The conflict of trade secrets protection and the right to freedom of information was reported, and the legal framework has been analysed in legal research.

Public accountability of the media is primarily conducted by different civil society organizations or the academia, with participation also of the HND both in its professional role with its Ethics council and in the public activist / oversight role. Civil society has had an important influence in media policy advocacy and media democratization since the 1990s (as well as in the 1980s, when it was accompanied by local / student media like Radio 101 and youth press).

Political accountability of media is conducted through different types of oversight and regulation including arms-length regulatory bodies (AEM, for the electronic media) or supervisory council (HRT, for the public service). The political field has the direct role of appointing the members of AEM, as well as the director general of HRT and the members of its supervisory council, who are all expected to be professionals with experience and a media freedom related track record. While the legal expectation is that they will be independent, the political parties in effect have the strongest role in their selection. The tradition of independence of public servants is not strong, and this can also be viewed as a risk.

HND and media are integrated into the relevant European associations and organizations. While there is no direct international accountability, breaches in any of the fields of freedoms are followed and noticed by various international organizations, like the European Federation of Journalists, or the Council of Europe platform for the protection of journalists, etc. This is an important opportunity.

In the *Journalism domain*, we find a dual model of the audio-visual market with a still strong (although not as strong as in the decade of the 2000) public service HRT and strong foreign-owned commercial television competitors on the national level, as well as several local television and radio stations. Commercial radio also transmits at regional and national level. The press sector is also varied with different owners, but both the audio-visual and the press markets are highly concentrated. The printed press market is seeing a continued downturn in revenues and audiences, and their transition to the online environment is ongoing, although slowed by the traditional lack of the subscription habit. Online sources are growing in importance, although the commercial TV, daily press, and a radio station still lead in the size of the news audiences. In the first five online news sources, only two are born-online, and the rest are web places of two daily papers and one commercial television. The importance of social media platforms as sources of news is also growing, especially in the younger age group.

The public service HRT has seen its ups and downs in the past 20 years regarding its editorial independence and public worthwhileness. While the past several years (especially after 2015) can be seen as more politically coerced / dependent, the period after 2000 was much more positive, and the preparation of new specialized digital channels by the interim team at the HRT in 2010/2011 was an optimistic era which unfortunately did not continue. The financial stability of HRT is a positive aspect, as it has been funded by a license fee paid by the citizens since

the 1960s. The position of the PSB is however not stable, as populist politicians often take it as a target, and considering the politically related appointments of their editors and the opinion that their programs are slanted, the HRT is becoming very hard to defend by those who believe in the importance of the public service.

Production conditions are influenced by the economic and political context as well as digitalization. The economic crisis and digitalization have negatively impacted some media organizations and journalistic positions (reduced pay and numbers in the printed press), and increased economic pressures on journalists, many of whom can be considered as precarious workers. The political pressures are mainly indirect, except for SLAPP lawsuits brought by public figures. Digitalization is influencing journalism roles and increases pressures especially in the online media. Their role by journalists is seen mainly as the traditional watch-dog role, but they also see themselves as advocates of social change. The hybridity of the media system is also evidenced by the inclusion of social media sources in legacy media programs and content.

Working conditions of journalists have been worsened recently, both regarding the speed of the news cycle related to the digitalization, and in relation to economic pressures aggravated by the COVID-19 pandemic, but also as a consequence of increased unwillingness of private media owners to negotiate union collective contracts with their journalists (and the failure of the state to enforce it).

Newsroom diversity is only studied regarding gender. We see women are leading as authors of news stories, but men lead in the presentation of the same stories and thus appear more in the news programs on television. In the editorial roles the gender balance exists, but not in the pay where women earn significantly less.

Professional journalism culture is based on the detached role of observer and the watchdog role, although a variety of different roles exists in different media. Only one university program gives a degree in journalism, but there are many more with degrees in communication or public relations. Ample possibilities for education exist.

Media usage patterns are influenced by the changes in the diversification of media supply in different channels and different media types. After 2000, the main expansions were in television channels (including new domestic commercial channels, which did not contribute much original programming apart from the required news programs, and some soap operas / comedy series), while after 2010 the digital multichannel streaming services and the social platforms are impacting both the entertainment and the news media market. While this diversity continues, the share of public service content is declining. This was enabled / accompanied by a strong rise in the spread of Internet access. Usage of Internet for reading news is among the highest in Europe.

Most Croatian audiences seem to prefer a tabloid daily for their news source, although this is not the full picture. Studies on news use have shown that different types of news users exist, among them avid news consumers of quality news, regional and national, as well as international news. Some news types prefer television, other newspapers, social media, or a mix of the digital sources. There are both strong mainstream oriented media (television and printed press) as well as more left or right leaning media, especially on the Internet. Polarization has been expanded in recent years in the right arm of the partisan media online which have gained a larger audience.

On a whole, trust in institutions is low in Croatia, and media were in 2009 still viewed as being linked to political institutions. After 2017, there is little change in the levels of trust (except for some increase because of the pandemic related reliance on news media). The legacy media are in the first place regarding trust, and 60% of audiences are concerned about misinformation on the Internet. Mistrust in professional journalists is higher than average for the countries included in the Oxford Digital News Report study.

Media-related competencies include media literacy policies and activities which are found to be inadequate and the levels of media literacy low. After 2015, a host of activities involving academia and NGOs were established to promote it, and especially regarding young people. The state education policy did not make media literacy a priority in school curricula, which might be seen as a risk.

In terms of user skills, research has mostly focused on technological capabilities of children (as has the school curricula). Research in 2000s shows mainly entertainment uses of media for children and youth, focusing on legacy media in the first instance. Studies after 2010 show proficiency of technical skills in young users, but a lack of critical thinking and content production skills. Half of the citizens have basic or a bit higher digital skill, somewhat below the EU average. This might be seen as a risk for deliberative communication.

Regarding their privacy rights and data protection skills, some 40 % of citizens do not know that their offline rights also apply online. Parents are also not always aware of the risks on the Internet, and 87 % of citizens think that everyone should be educated in digital online skills. This area of research is not large so far, but the results show signs of risks for unaware media users.

6.2. Critical Junctures and Agency of Key Actors in the Four Risk and Opportunities Areas

The longue durée change in Croatia is among those examples that include frequent disruptions to the previous development paths, and this volatility of political regimes and frequent change can perhaps explain its less than perfect democratic consolidation after 1990. While the country is seen as free and a democracy (though now with the adjective “electoral”), it was for the past 20 years ranked lower in media freedom indexes than other CEE countries (but higher than other SEE countries, except Slovenia). The hard transition of the 1990s was not only a democratic transition, but a state-building period when the country / republic declared its independence from the SFR Yugoslavia, and this decade included a war on its territory and a semi-authoritarian president together. The change of government in 2000 brought the second post-socialist critical juncture and a path towards a pluralist media policy and media system was charted. The beginning of the decade of 2000 saw a democratization of the political and media system, the overhaul of media legislation, opening of the audio-visual market to foreign investment, increased entry of foreign capital in the media market, and growth of the advertising market and industry. Some experts find that the primary focus on profits in the media corporations is the reason for the deterioration of news quality, and the predominance of the advertising and promotional model.³⁷ The economic crisis of 2008 had very strong negative consequences for the whole economy. The media suffered primarily from the slowing down of advertising, the lowered press circulations, and the general constriction of the media market. The digitalization was also starting to take its tool, but it will be the pandemic juncture of COVID-19 in 2019 that will make the largest impact in terms of the digital overtake. Even though the online media and platforms had already started to take primacy before the pandemic, especially with younger generations, the stay-at-home and lockdowns and working from home have changed news habits even more, to the detriment of especially the printed press.

The Croatian study identified several types of critical junctures in the 2000–2020 period. These include political junctures, legislative junctures, economic junctures, and communication junctures. These junctures are necessarily intertwined, one affecting the other, and their separation is necessary only to simplify the analysis and its explanation.

³⁷ Nada Zgrabljic Rotar (October 2022, contribution in interview).

The political junctures occurred in 1989–1991 with the start of the post-socialist democratic transition, in 2000 with the new democratization impetus and the change from the semi-presidential to a parliamentary political system, democratic consolidation after the second peaceful transfer of government to different parties (in 2003). The third political juncture can be identified as starting in 2015, with the rise of the populist, predominantly right, parties and politicians. This political juncture turned the political field further to the right with significant negative impact on the media and especially the editorial policy and personnel in the public service HRT. The polarization of the media market also increased at this juncture, with an increase in the popularity of right wing media outlets (mainly online ones). The main agency in these critical junctures is on the political field and its players. Political parties have the key role, but increasingly they are of a changed character, many of them without any policy initiatives and only riding on the populist sentiment. The rise of politically organized civil society is also an increasingly visible player, although with not much interest or influence in the media field.

Legislative junctures are related to political junctures or their consequent paths. The second political juncture in 2000 set a path of media democratization, liberalization, and opening to foreign investment, which was defined in the legal framework for the media. The advent of the more conservative governments that succeeded it, influenced again the direction of legal changes – for instance, the introduction of the shaming offense by the HDZ government in 2010. It took nine years for them to remove this offence completely, after the SDP government had in the 2011–2013 period watered it down to make it practically useless for SLAPP purposes. Outside political will also introduces legal junctures. The EU legislature had a direct role in this regard or was used as a pretext for legal changes that were not required by it (i.e., the 2010 change of the HRT Act which made it more dependent on the government by introducing the programming contract that has to be approved by the government on a regular basis). EU accession process of course influenced the legislative framework and continues to do so today as a member state. Here the legislators, members of parliament, seem to be the main agents, but in Croatia the supremacy of the executive is felt here as well, so the main agents are again political parties. The civil society organizations (including HND), prominent journalists and experts were also active players in the changing legislative framework, contributing at the same time to the development of the political will and the shape of the legislative, not always to the exact shape they wanted but their contribution was certainly an important democratizing one (especially in the 1990s and the 2000s).

Economic junctures sometimes come because of the political junctures. In the Croatian case, the economic liberalization of the media market came because of a political juncture. Other economic junctures – the world crisis of 2008, or the consequence of the COVID-19 pandemic of 2019 – are exogenous, and not related to internal or any identifiable international level political agents. The interested media owners were also active agents in the liberalization of the media system, which has with time given more and more space to the commercial media (to the detriment of the public service broadcaster and non-profit media).

The communication juncture – digitalization, platformization, mediatization, hybridity of media system and the public sphere – was noticeable also in Croatia in the past two decades. Not many of its consequences or manifestations have been thoroughly studied to date, but we can note the change in the practices of news production and consumption, the changes in the relationship between the political and the media field, and the growing voice (if most often only the angry one, and not a deliberative one) of the citizens in the social media.

Annex I: Experts interviewed for the study

We would like to thank the following experts for their willingness to share their opinion:

Vesna Alaburić, attorney at law, lecturer, Faculty of Political Science of the University of Zagreb

Antonija Čuvalo, professor, Department of Communication and Media, Faculty of Political Science of the University of Zagreb

Vanja Jurić, attorney at law

Igor Kanižaj, professor, Department of Journalism, Faculty of Political Science of the University of Zagreb

Davor Mezulić, director Radio, HRT (retired)

Maja Sever, journalist, president of the Union of Croatian Journalists (SNH) and the European Journalist Federation (EFJ)

Gordana Vilović, professor, Department of Journalism, Faculty of Political Science of the University of Zagreb

Tomislav Wruss, director, publishing of printed and digital editions, Hanza Media

Nada Zagrablić Rotar, professor, Department of Communication, Faculty of Croatian Studies of the University of Zagreb

References

Act for the Protection of Persons Reporting Irregularities [Zakon o zaštiti prijavitelja nepravilnosti]. *Narodne novine*, 17/19. <https://www.zakon.hr/z/3130/Zakon-o-zaštiti-prijavitelja-nepravilnosti-2019-2022>

Act on Misdemeanors against Public Order and Peace [Zakon o prekršajima protiv javnog reda i mira]. *Narodne novine*, 5/90, 30/90, 47/90, 29/94. <https://www.zakon.hr/z/279/Zakon-o-prekršajima-protiv-javnog-reda-i-mira>

Act on the Implementation of the General Data Protection Regulation [Zakon o provedbi Opće uredbe o zaštiti podataka]. *Narodne novine*, 42/18. <https://www.zakon.hr/z/1023/Zakon-o-provedbi-Opće-uredbe-o-zaštiti-podataka>

Act on the Protection of Undisclosed Information with Market Value [Zakon o zaštiti neobjavljenih informacija s tržišnom vrijednosti]. *Narodne novine*, 30/18. <https://www.zakon.hr/z/1017/Zakon-o-zaštiti-neobjavljenih-informacija-s-tržišnom-vrijednosti>

Act on the Right of Access to Information [Zakon o pravu na pristup informacijama]. *Narodne novine*, 25/13, 85/15. <https://www.zakon.hr/z/126/Zakon-o-pravu-na-pristup-informacijama>

Agencija za elektroničke medije (AEM). (2013). *Analiza TV tržišta*. Ipsos Puls, Media HUB & AGB Nielsen. <https://www.aem.hr/wp-content/uploads/2018/11/Analiza-TV-tr%C5%BEi%C5%A1ta-2013..pdf>

Agencija za elektroničke medije (AEM). (2015). *Analiza radijskog tržišta*. Ipsos Connect. <https://www.aem.hr/wp-content/uploads/2018/11/Analiza-radijskog-tržišta.pdf>

Agencija za elektroničke medije (AEM). (2016). *Navike gledanja televizijskog programa*. Ipsos Connect. <https://www.aem.hr/wp-content/uploads/2018/11/AEM-prezentacija-navike-gledanja-TV.pdf>

Agencija za elektroničke medije (AEM). (2022). *Knjiga pružatelja elektroničkih publikacija*. <https://www.aem.hr/elektronicke-publikacije/>

Agencija za zaštitu tržišnog natjecanja (AZTN). (2016). *Istraživanje tržišta tiska u 2015. i 2016.* <https://www.aztn.hr/ea/wp-content/uploads/2016/10/tržište-tiska-2015.-i-2016..pdf>

Agencija za zaštitu tržišnog natjecanja (AZTN). (2021). *Istraživanje tržišta tiska za 2020.* <https://www.aztn.hr/ea/wp-content/uploads/2016/10/Istraživanje-tržišta-tiska-za-2020..pdf>

- Alaburić, V. (2000). Pravo i pravne institucije u stvaranju neovisnih medija. *Medijska istraživanja*, 6(2), 65–68. <https://hrcak.srce.hr/26299>
- Alerić, M., Kolar Billege, M., & Budinski, V. (2019). Medijsko opismenjavanje u osnovnoj školi. *Communication Management Review*, 44(1), 50–59. <https://doi.org/10.22522/cmr20190139>
- Andresen, K., Hoxha, A., & Godole, J. (2017). New Roles for Media in the Western Balkans. *Journalism Studies*, 18(5), 614–628. <https://doi.org/10.1080/1461670X.2016.1268928>
- Andrijašević, I., & Car, V. (2013). How we survived digital television broadcasting switchover: The case of Croatia. *International Journal of Digital Television*, 4(3), 279–298. https://doi.org/10.1386/jdtv.4.3.279_1
- Badrov, S. (2007). Kaznena djela protiv časti i ugleda u hrvatskom kaznenom pravu. *Pravnik*, 41(84), 61–94. <https://hrcak.srce.hr/13294>
- Bannerman, S., & Haggart, B. (2015). Historical institutionalism in communication studies. *Communication Theory*, 25(1), 1–22. <https://doi.org/10.1111/comt.12051>
- Bárd, P., Bayer, J., Luk, N. C., & Vosyliute, L. (2020). *Ad-Hoc Request. SLAPP in the EU context*. Academic Network on European Citizenship Rights. https://ec.europa.eu/info/sites/default/files/ad-hoc-literature-review-analysis-key-elements-slapp_en.pdf
- Bertelsmann Stiftung (BTI). (2016). *BTI 2016 — Croatia Country Report*. https://bti-project.org/fileadmin/api/content/en/downloads/reports/country_report_2016_HRV.pdf
- Bilić, P. (2012). Croatian Media System between Reflexive Modernization and Mediatization: Societal and Institutional Analysis. *Društvena istraživanja*, 21(4), 821–842. <https://doi.org/10.5559/di.21.4.01>
- Bilić, P. (2020). *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019. Country report: Croatia*. European University Institute. <https://op.europa.eu/en/publication-detail/-/publication/7e94d312-dd0c-11ea-adf7-01aa75ed71a1/language-en/format-PDF/source-222956526>
- Bilić, P., & Primorac, J. (2018). The Digital Advertising Gap and the Online News Industry in Croatia. *Medijske studije*, 9(18), 62–80. <https://doi.org/10.20901/ms.9.18.4>
- Bilić, P., & Švob-Đokić, N. (2016). The pendulum model of Croatian media policy: Digitalisation between public interests and market competition. *European Journal of Communication*, 31(5), 503–518. <https://doi.org/10.1177/0267323116659976>
- Bilić, P., Balabanić, I., Primorac, J., Jurlin, K., & Eterović, R. (2017). *Analiza tržišta elektroničkih publikacija*. Institut za razvoj i međunarodne odnose. <https://www.aem.hr/wp-content/uploads/2018/11/IRMO-Analiza-tržišta-elektroničkih-publikacija.pdf>
- Bilić, P., Petričušić, A., & Eterović, R. (2017). *Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2017 in the European Union, FYROM, Serbia & Turkey. Country Report: Croatia*. Centre for Media Pluralism and Media Freedom. https://cmpf.eui.eu/wp-content/uploads/2018/11/Croatia_MPM2017_country-report.pdf
- Bilić, P., Petričušić, A., Balabanić, I., & Vučković, V. (2017). *Media pluralism monitor 2016: Monitoring risks for media pluralism in the EU and beyond. Country report : Croatia*. Centre for Media Pluralism and Media Freedom. https://cadmus.eui.eu/bitstream/handle/1814/46790/Croatia_EN.pdf?sequence=1&isAllowed=y
- Bilić, P., Valečić, M., & Prug, T. (2021). *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor in the European Union, Albania, Montenegro, The Republic of North Macedonia, Serbia & Turkey in the year 2020. Country Report: Croatia*. Centre for Media Pluralism and Media Freedom. <https://irmo.hr/wp-content/uploads/2021/08/PDF2.pdf.pdf>
- Boban, M. (2012). Pravo na privatnost i pravo na pristup informacijama u suvremenom informacijskom društvu. *Zbornik radova Pravnog fakulteta u Splitu*, 49(3), 575–598. <https://hrcak.srce.hr/86834>

- Božić, V. (2019). Critical Review of the Incrimination of Criminal Acts Against Honor and Reputation in the Croatian Criminal Law. *Proceedings of the International Scientific Conference "Social Changes in the Global World"*, 1(6), 589–601.
<https://js.ugd.edu.mk/index.php/scgw/article/view/3147/2859>
- Božić, V. (2020). Comparative Review of New Reform of Criminal Offenses Against Honor and Reputation in the Criminal Legislation of Serbia and Croatia. *Knowledge International Journal*, 38(5), 1059–1065. <https://ikm.mk/ojs/index.php/kij/article/view/1199/1198>
- Brautović, M. (2007). Blogovi kao novinarski izvori. *MediAnali*, 1(2), 129–138.
<https://hrcak.srce.hr/41589>
- Brautović, M. (2009). Usage of Newsroom Computer Systems as Indicator of Media Organization and Production Trends: Speed, Control and Centralization. *Medijska istraživanja*, 15(1), 27–42.
<https://hrcak.srce.hr/37284>
- Brautović, M. (2010). Razvoj hrvatskog online novinarstva 1993-2010. *MediAnali*, 4(8), 23–42.
<https://hrcak.srce.hr/65463>
- Car, V. (2010). Televizija u novomedijskom okruženju. *Medijske studije*, 1(1–2), 91–103.
<https://hrcak.srce.hr/76704>
- Car, V. (2011). Javni medijski servisi – čuvari demokracije. In M. Romić (Ed.), *Izolacija ili integracija?* (pp. 41–62). BaBe!
https://www.academia.edu/21696520/Car_Viktorija_2011_Javni_medijski_servisi_čuvari_demokracije_str._41-62_u_Romić_Milana_ur._Izolacija_ili_integracija._Zagreb_BaBe
- Car, V. (2019). Public Service Radio and Television in Croatia – at the Service of the Public or Politics? In D. Fabijanić & H. Sittig (Eds.), *A Pillar of Democracy on Shaky Ground: Public Service Media in South East Europe* (pp. 93–112). Konrad Adenauer Stiftung.
- Car, V., & Andrijašević, I. (2012). *Mapping Digital Media: Croatia*. Open Society Institute.
<https://www.opensocietyfoundations.org/publications/mapping-digital-media-croatia>
- Car, V., & Bukvić, M. (2016). Croatia: Journalism – still a popular profession, and increasingly female. In V. Car, M. Radojković & M. Zlateva (Eds.), *Requirements for modern journalism education: The perspective of students in South East Europe* (pp. 66–101). Konrad Adenauer Stiftung.
<https://www.kas.de/c/documentlibrary/getfile?uuid=1f6f4be1-1d59-f416-78a6-a1105b098a82&groupId=252038>
- Car, V., Leaković, K., Stević, A., & Stipović, J. (2017). Žene i muškarci u televizijskim vijestima: Glasovi nejednake vrijednosti. *Medijska istraživanja*, 23(1), 73–100.
<https://doi.org/10.22572/mi.23.1.4>
- Castro Herrero, L., Humprecht, E., Engesser, S., Brüggemann, M., & Büchel, F. (2017). Rethinking Hallin and Mancini Beyond the West: An Analysis of Media Systems in Central and Eastern Europe. *International Journal of Communication*, 11(27), 4797–4823.
- Cernison, M., & Ostling, A. (2017). *Measuring Media Literacy in the EU: Results from the Media Pluralism Monitor 2015*. Robert Schuman Centre for Advanced Studies.
https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2906216
- Ciboci, L. (2018). Medijska pismenost učenika osmih razreda u Zagrebu. *Medijske studije*, 9(17), 23–46. <https://doi.org/10.20901/ms.9.17.3>
- Ciboci, L., & Labaš, D. (2019). Digital Media Literacy, School and Contemporary Parenting. *Medijske studije*, 10(19), 83–101. <https://doi.org/10.20901/ms.10.19.5>
- Ciboci, L., & Osmančević, L. (2015). Kompetentnost nastavnika hrvatskog jezika za provođenje medijske kulture u hrvatskim osnovnim školama. In V. Car, L. Turčilo & M. Matović (Eds.), *Medijska pismenost – preduvjet za odgovorne medije* (pp. 121–138). Fakultet političkih nauka Univerziteta u Sarajevu.
<https://www.researchgate.net/publication/313528072Kompetentnostnastavnikahrvatskogajezikazaprovodenjemedijskekultureuhrvatskimosnovnimiskolama>

- Ciboci, L., Čosić, P., Kanižaj, I., Potočnik, D., & Vinković, D. (2020). *Nacionalno istraživanje o sigurnosti djece na internetu*. Društvo za komunikacijsku i medijsku kulturu.
<http://hrkids.online/prez/EUKidsOnlineHRfinal.pdf>
- Ciboci, L., Gazdić Alerić, T., & Kanižaj, I. (2019). Percepcija ravnatelja osnovnih škola o važnosti medijske pismenosti u primarnome obrazovanju. *Communication Management Review*, 4(1), 60–77. <https://doi.org/10.22522/cmr20190140>
- Ciboci, L., Kanižaj, I., & Labaš, D. (2015). Public opinion research as a prerequisite for media education strategies and policies. In S. Kotilainen & R. Kupiainen (Eds.), *Reflections on media education futures* (pp. 171–182). NORDICOM.
https://www.nordicom.gu.se/sites/default/files/publikationer-hela-pdf/yearbook_2015.pdf
- Copyright and Related Rights Act [Zakon o autorskom pravu i srodnim pravima]. *Narodne novine*, 111/21. <https://www.zakon.hr/z/106/Zakon-o-autorskom-pravu-i-srodnim-pravima>
- Criminal Code [Kazneni zakon]. *Narodne novine*, 125/11, 144/12, 56/15, 61/15, 101/17, 118/18, 126/19. <https://www.zakon.hr/z/98/Kazneni-zakon>
- Croatian Radiotelevision Act [Zakon o Hrvatskoj radioteleviziji]. *Narodne novine*, 137/10, 76/12, 78/16, 46/17, 73/17, 94/18. <https://www.zakon.hr/z/392/Zakon-o-Hrvatskoj-radioteleviziji>
- Čuvalo, A. (2010). Osobine medijskih publika i povjerenje u medije. *Medijske studije*, 1(1–2), 40–53. <https://hrcak.srce.hr/76700>
- Čuvalo, A. (2013). Institutional trust in the Croatian post-socialist context. *CM-časopis za upravljanje komuniciranjem*, 8(26), 145–163. <https://doi.org/10.5937/comman1326145C>
- Čuvalo, A., & Peruško, Z. (2017). Ritmovi medijskih generacija u Hrvatskoj: Istraživanje repertoara medijskih generacija iz sociološke perspektive. *Revija za sociologiju*, 47(3), 271–302. <https://doi.org/10.5613/rzs.47.3.2>
- Data Secrecy Act [Zakon o tajnosti podataka]. *Narodne novine*, 79/07, 86/12. <https://www.zakon.hr/z/217/Zakon-o-tajnosti-podataka>
- Derenčinović, D. (2015, March 19). *Kazneno djelo sramoćenja: Potraga za odgovornom javnom riječi*. Vijenac, 549. <https://www.matica.hr/vijenac/549/potruga-za-odgovornom-javnom-rijeci-24279/>
- Državni zavod za statistiku (DZS). (2008). *Statističke informacije 2008*. Državni zavod za statistiku Republike Hrvatske. <https://podaci.dzs.hr/media/sjwpcnocy/statinfo2008.pdf>
- Državni zavod za statistiku (DZS). (2011). *Statističke informacije 2011*. Državni zavod za statistiku Republike Hrvatske. <https://podaci.dzs.hr/media/eubk402p/statinfo2011.pdf>
- Državni zavod za statistiku (DZS). (2015). *Statističke informacije 2015*. Državni zavod za statistiku Republike Hrvatske. <https://podaci.dzs.hr/media/4sxxspd0/statinfo2015.pdf>
- Državni zavod za statistiku (DZS). (2020). *Statističke informacije 2020*. Državni zavod za statistiku Republike Hrvatske. <https://podaci.dzs.hr/media/v2onhbqe/statinfo2020.pdf>
- Državni zavod za statistiku (DZS). (2021). *Hrvatska u brojkama 2021*. Državni zavod za statistiku Republike Hrvatske. https://podaci.dzs.hr/media/fagflfgk/croinfo_2021.pdf
- Economist Intelligence Unit (EIU). (2021). *Democracy Index 2020: In sickness and in health?* <https://www.eiu.com/n/campaigns/democracy-index-2020/>
- Electronic Media Act [Zakon o elektroničkim medijima]. *Narodne novine*, 111/21. <https://www.zakon.hr/z/196/Zakon-o-elektroničkim-medijima>
- European Commission. (2021a). *Digital Economy and Society Index (DESI) 2021: Croatia*. <https://digital-strategy.ec.europa.eu/en/policies/desi-croatia>
- European Commission. (2021b). *Media use in the European Union*. <https://op.europa.eu/en/publication-detail/-/publication/d2dbcf78-11e0-11ec-b4fe-01aa75ed71a1/language-en>

- Eurostat. (2021). *Individuals' level of digital skills*
https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=isoc_sk_dskl_i&lang=en
- Galić, M. (2018). *Tranzicija dnevnih tiskovina u e-publikacije* [Doctoral dissertation]. Filozofski fakultet Sveučilišta u Zagrebu.
- Gavranović, A., & Naprta, R. (2008). Ekonomski položaj medija u Hrvatskoj. *MediAnali*, 2(3), 69–84.
<https://hrcak.srce.hr/42362>
- Giddens, A. (2012, October 16) *Understanding Society – A Sociologists' Perspective* [Lecture]. YouTube. <https://www.youtube.com/watch?v=xl6FoLrv4JQ&t=413s>
- GONG. (2013, September 17). *Koncesija prikrivenom vlasniku*.
<https://gong.hr/2021/09/17/koncesija-prikrivenom-vlasniku/>
- Grbavac, A. (2020, December 21). *Vesna Alaburić: Ministarstvo se hitno treba pozabaviti pitanjem GDPR-a u medijima*. Global. <https://www.globalnovine.eu/intervju/ministarstvo-se-hitno-treba-pozabaviti-pitanjem-gdpr-a-u-medijima/>
- Grbeša, M., & Volarević, M. (2021). Media in Croatia: from freedom fighters to tabloid avengers. *Publizistik*, 66(1), 621–636. <https://doi.org/10.1007/s11616-021-00683-y>
- Grmuša, T., Tomulić, A. M., & Anđelić, V. (2019). Zaštita privatnosti djece i maloljetnika na društvenoj mreži Facebook: navike i iskustva roditelja. *Communication Management Review*, 4(1), 78–97.
<https://doi.org/10.22522/cmr20190141>
- Hallin, D. C., & Mancini, P. (2004). *Comparing Media Systems*. Cambridge University Press.
- HINA. (2022, February 14). *Prodan RTL Hrvatska*. HRT Vijesti.
<https://vijesti.hrt.hr/gospodarstvo/prodan-rtl-hrvatska-5439297>
- Hoffmann, D. (2015, November 29). *Govor mržnje i diskriminacije u izbornoj kampanji 2015*. GONG.
<https://gong.hr/2015/11/29/govor-mrznje-i-diskriminacije-u-izbornoj-kampanji/>
- Hoffmann, D. (2016, September 27). *Izveštaj o praćenju govora mržnje, diskriminatornog, stereotipizirajućeg i zapaljivog govora u informativnim medijima u rujnu 2016*. GONG.
https://gong.hr/media/uploads/2016_09.pdf
- Hrvatsko novinarsko društvo (HND). (2009). *Kodeks časti hrvatskih novinara*.
<https://www.hnd.hr/kodeks-casti-hrvatskih-novinara1>
- Ilišin, V. (2005). Roditelji kao medijski odgajatelji: Komunikacija djece i roditelja o medijskim sadržajima. In N. Zgrabljic Rotar (Ed.), *Medijska pismenost i civilno društvo* (pp. 131–153). MEDIACENTAR Sarajevo. <https://www.media.ba/sites/default/files/medialiteracy.pdf>
- Ilišin, V., Bobinac, A., & Radin, F. (2001). *Djeca i mediji: uloga medija u svakodnevnom životu djece*. Institut za društvena istraživanja.
- IREX. (2019). *Media Sustainability Index 2019: Croatia*.
<https://www.irex.org/sites/default/files/pdf/media-sustainability-index-eurasia-2019-croatia.pdf>
- Jergović, B. (2003). Zakonske promjene i tisak u Hrvatskoj od 1990. do 2002. *Politička misao*, 40(1), 92–108. <https://hrcak.srce.hr/23299>
- Kalogeropoulos, A. (2017). *News Avoidance*. University of Oxford.
- Kanižaj, I. (2016). Mapping media literacy in Croatia – National Summary. In F. J. C. Blázquez & S. Valais (Eds.), *Mapping of Media Literacy Practices and Actions in EU-28* (pp. 206–217). European Audiovisual Observatory. <https://op.europa.eu/en/publication-detail/-/publication/0a387a0a-3e5f-11ea-ba6e-01aa75ed71a1>
- Kanižaj, I. (2019). Media Literacy in Croatia. In R. Hobbs & P. Mihailidis (Eds.), *The International Encyclopedia of Media Literacy* (pp. 1–7). Wiley Online Library.
<https://doi.org/10.1002/9781118978238.ieml0144>
- Kanižaj, I., & Car, V. (2015). Hrvatska: Nove prilike za sustavni pristup medijskoj pismenosti. In V. Car, L. Turčilo & M. Matović (Eds.), *Medijska pismenost – preduvjet za odgovorne medije* (pp. 19–

- 38). Fakultet političkih nauka Univerziteta u Sarajevu. <https://www.hanns-seidel-stiftung.com.hr/assets/images/news/medijskapismenost.pdf>
- Klancir, Đ. (2021, December 15). *Tko sve i kako pritišće novinare i novinarke: od političara do oglašivača*. GONG. <https://gong.hr/2021/12/15/tko-sve-pritisce-novinare-i-novinarke-od-politicara-do-oglasivaca/>
- Kralj, L. (2016). E-sigurnost i digitalne vještine kao dio školskog kurikula. *Medijske studije*, 7(13), 59–74. <https://doi.org/10.20901/ms.7.13.4>
- Krištofić, B. (2007). Digitalna nejednakost. *Sociologija i prostor*, 45(2), 165–182. <https://hrcak.srce.hr/17633>
- Krolo, K., Tonković, Ž., & Marčelić, S. (2020). The great divide? Cultural capital as a predictor of television preferences among Croatian youth. *Poetics*, 80(1), 101400. <https://doi.org/10.1016/j.poetic.2019.101400>
- Labour Act [Zakon o radu]. *Narodne novine*, 93/14, 127/17, 98/19. <https://www.zakon.hr/z/307/Zakon-o-radu>
- Lamza Posavec, V., & Rihtar, S. (2003). Neke osobine publike informativno-političkog tiska. *Društvena istraživanja*, 12(6), 927–956. <https://hrcak.srce.hr/19269>
- Lessenski, M. (2017, October 11). *Media Literacy Index 2017: Can this be true? Predictors of media literacy and resilience to the post-truth phenomenon in Europe*. Open Society Institute. <https://osis.bg/?p=437&lang=en>
- Lessenski, M. (2021). *Media Literacy Index 2021. Double Trouble: Resilience to Fake News at the Time of Covid-19 Infodemic*. Open Society Institute. <https://osis.bg/wp-content/uploads/2021/03/MediaLiteracyIndex2021ENG.pdf>
- Mahoney, J. (2001). Path-dependent explanations of regime change: Central America in comparative perspective. *Studies in Comparative International Development*, 36(1), 111–141. <https://doi.org/10.1007/BF02687587>
- Majstorović, D., & Vilović, G. (2012). Motivacija studenata Fakulteta političkih znanosti Sveučilišta u Zagrebu za studiranje novinarstva. *Medijske studije*, 3(5), 118–126. <https://hrcak.srce.hr/95272>
- Malović, S. (2004). Ima li granice slobodi medija? *Politička misao*, 41(1), 32–41. <https://hrcak.srce.hr/22855>
- Malović, S. (2018). Croatia: Unfulfilled Expectations. In T. Eberwein, S. Fengler & M. Karmasin (Eds.), *The European Handbook of Media Accountability* (pp. 31–38). Routledge.
- Maršavelski, A., & Juras, D. (2019). Kriitička analiza Prijedloga pete novele Kaznenog zakona. *Hrvatski ljetopis za kaznene znanosti i praksu*, 26(2), 529–559. <https://hrcak.srce.hr/232777>
- Mataušić, M. J., & Rimac, I. (2000). Following the Media and Attitude Towards Values. *Bogoslovska smotra*, 70(2), 485–498. <https://hrcak.srce.hr/31173>
- Mattoni, A., & Ceccobelli, D. (2018). Comparing hybrid media systems in the digital age: A theoretical framework for analysis. *European Journal of Communication*, 33(5), 540–557. <https://doi.org/10.1177/0267323118784>
- McChesney, R. W. (2007). *Communication Revolution: Critical Junctures and the Future of Media*. New Press.
- Media Act [Zakon o medijima]. *Narodne novine*, 59/04, 84/11, 81/13. <https://www.zakon.hr/z/38/Zakon-o-medijima>
- Mijić Vulinović, I. (2021). Restrictions on freedom of expression in the Republic of Croatia in relation to international law, with special reference to judgments of the European Court. *Zbornik radova Pravnog fakulteta u Splitu*, 58(3), 967–988. <https://doi.org/10.31141/zrpf.2021.58.141.967>
- Mikić Preradović, N., Lešin, G., & Šagud, M. (2016). Investigating Parents' Attitudes towards Digital Technology Use in Early Childhood: A Case Study from Croatia. *Informatics in Education*, 15(1), 127–146. <https://doi.org/10.15388/infedu.2016.07>

- Milosavljević, M., & Broughton Micova, S. (2013). Because we have to: Digitalization of terrestrial television in South East Europe. *International Journal of Digital Television*, 4(3), 261–277. https://doi.org/10.1386/jdtv.4.3.261_1
- Ministry of Culture. (2015). *Nacrt prijedloga medijske politike Republike Hrvatske do 2020. godine*. Vlada Republike Hrvatske, Ministarstvo kulture. <http://www.hnd.hr/uploads/files/nacrtprijedlogamedijskepolitikerepublikehrvatske.pdf>
- Mirković, N., & Žagar, D. (2013). *Pluralizam i vlasništvo medija u Hrvatskoj – slučaj tržišta lokalnih radija: Uska grla lokalnih radija u Hrvatskoj*. Građani organizirano nadgledaju glasanje. https://www.gong.hr/media/uploads/20140212_analiza_uska_grla_lokalnih_radija_u_hrvatskoj_finalno.pdf
- Moore, B. (1966). *Social Origins of Dictatorship and Democracy: Lords and Peasant in Making of the Modern World*. Beacon Press.
- Mučalo, M. (2010). Radio: Medij neiskorištenog povjerenja. *Medijske studije*, 1(1–2), 78–90. <https://hrcak.srce.hr/76703>
- Mučalo, M., & Knežević, D. (2014). FM radio i mladi: slušatelji ili korisnici? *Medijske studije*, 5(9), 61–74. <https://hrcak.srce.hr/127716>
- Munivrana Vajda, M., & Šurina Marton, A. (2016). Gdje prestaju granice slobode izražavanja, a počinje govor mržnje? Analiza hrvatskog zakonodavstva i prakse u svjetlu europskih pravnih standarda. *Hrvatski ljetopis za kaznene znanosti i praksu*, 23(2), 435–467. <https://hrcak.srce.hr/177439>
- Musa, A. (2019). Croatia: The transparency landscape. In D. C. Dragos, P. Kovač, & A. T. Marseille (Eds.), *The Laws of Transparency in Action* (pp. 339–387). Palgrave Macmillan. https://doi.org/10.1007/978-3-319-76460-3_9
- Nenadić, I. (2020). *Twitter and Changing Journalistic Practice in Croatia* [Doctoral dissertation]. Sveučilište Josipa Jurja Strossmayera u Osijeku.
- Newman, N., Fletcher, R., Schulz, A., Andi, S., & Kleis Nielsen, R. (2020). *Digital News Report 2020*. Reuters Institute. https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf
- Norris, P., & Inglehart, R. (2009). *Cosmopolitan Communications: Cultural Diversity in a Globalized World*. Cambridge University Press. <https://doi.org/10.1017/CBO9780511804557>
- Novoselec, P. (2016). Zaštita časti i ugleda u novom Kaznenom zakonu. *Zbornik Pravnog fakulteta u Zagrebu*, 66(4), 443–468. <https://hrcak.srce.hr/164766>
- Perišin, T. (2013). Convergence Journalism and the Public Interest: The Case of Croatian Public Radio Television (HRT). *Politička misao*, 50(5), 155–172. <https://hrcak.srce.hr/115733>
- Peruško Čulek, Z. (1999). Nova medijska agenda: za europsku medijsku politiku u Hrvatskoj. *Medijska istraživanja*, 5(2), 285–301.
- Peruško Čulek, Z. (2003). Croatia: The first ten years. In D. L. Paletz & K. Jakubowicz (Eds.), *Business as Usual. Continuity and Change in Central and Eastern European Media* (pp. 111–143). Hampton Press.
- Peruško, Z. (2003). Medijska koncentracija: izazov pluralizmu medija u Srednjoj i Istočnoj Europi. *Medijska istraživanja*, 9(1), 39–58. <https://hrcak.srce.hr/23324>
- Peruško, Z. (2005). *Television Across Europe: Regulation, Policy and Independence: Croatia*. Open Society Institute. <https://www.opensocietyfoundations.org/uploads/46941ffe-6fd0-48a3-aac5-2858b56fa86d/volone200510110.pdf>
- Peruško, Z. (2006). Mediji. In S. Goldstein (Ed.), *Indeks otvorenosti društva* (pp. 75–84). Zagreb: Open Society Institute Croatia.
- Peruško, Z. (2009). Public Interest and Television Performance in Croatia. *Medijska istraživanja*, 15(2), 5–31. <https://hrcak.srce.hr/46038>

- Peruško, Z. (2011). *Assessment of Media Development in Croatia Based on UNESCO's Media Development Indicators*. United Nations Educational Scientific and Cultural Organization.
- Peruško, Z. (2012). Medijski sustav u Hrvatskoj: od autoritarnog do mediteranskog modela. In V. Puljiz, S. Ravlić & V. Visković (Eds.), *Hrvatska u Europskoj uniji: kako dalje?* (pp. 437–475). Centar za demokraciju i pravo Miko Tripalo.
- Peruško, Z. (2013). Rediscovering the Mediterranean characteristics of the Croatian media system. *East European Politics and Societies*, 27(4), 709–726. <https://doi.org/10.1177%2F0888325413494770>
- Peruško, Z. (2016). Historical Institutional Approach in Comparative Media Systems Research: The Case of Post-Yugoslavia. *Javnost – The Public*, 23(3), 255–272. <https://doi.org/10.1080/13183222.2016.1210461>
- Peruško, Z. (2017). *Digital News Report: Croatia*. Reuters Institute & University of Oxford. <https://www.digitalnewsreport.org/survey/2017/croatia-2017/>
- Peruško, Z. (2019). *Digital News Report: Croatia*. Reuters Institute & University of Oxford. <https://reutersinstitute.politics.ox.ac.uk/sites/default/files/digital-news-report-2018.pdf>
- Peruško, Z. (2020). *Digital News Report: Croatia*. Reuters Institute & University of Oxford. <https://www.digitalnewsreport.org/survey/2020/croatia-2020/>
- Peruško, Z. (2021a). Overcoming path dependencies in PBS developments in Southeast Europe. In T. Jusić, D. Marko, L. Castro Herrero, & M. Puppis (Eds.), *Up in the Air? The Future of Public Service Media in the Western Balkans* (pp. 169–187). CEU Press.
- Peruško, Z. (2021b). Public Sphere in Hybrid Media Systems in Central and Eastern Europe. *Javnost – The Public*, 28(1), 36–52. <https://doi.org/10.1080/13183222.2021.1861405>
- Peruško, Z., & Čuvalo, A. (2014). Comparing Socialist and Post-Socialist Television Culture. Fifty Years of Television in Croatia. *VIEW Journal of European Television History and Culture*, 3(5), 131–150. <https://doi.org/10.25969/mediarep/14101>
- Peruško, Z., & Popović, H. (2008a). From transmission to the public good: Media policy for the digital age in Croatia. In M. Sükösd & A. Isanović (Eds.), *Public Service Television in the Digital Age: Strategies and Opportunities in Five SouthEast European Countries* (pp. 141–190). MEDIACENTAR Sarajevo. <https://www.media.ba/sites/default/files/shared/CroatiachapterPerusko-Popovic.pdf>
- Peruško, Z., & Popović, H. (2008b). Media Concentration Trends in Central and Eastern Europe. In K. Jakubowicz, & M. Sükösd (Eds.), *Finding the Right Place on the Map: Central and Eastern European Media Change in a Global Perspective* (pp. 165–189). Intellect.
- Peruško, Z., & Vozab, D. (2017). Socialist And Post-Socialist Communication Research: A Longitudinal Analysis. *Zeszyty Prasoznawcze*, 2(230), 361–381. <https://doi.org/10.4467/22996362PZ.17.023.7303>
- Peruško, Z., Čuvalo, A., & Vozab, D. (2016). *Country report: Journalists in Croatia*. Worlds of Journalism Study. <https://epub.ub.uni-muenchen.de/29703/1/CountryreportCroatia.pdf>
- Peruško, Z., Čuvalo, A., & Vozab, D. (2017a). Mediatization of Journalism: Influence of the Media System and Media Organization on Journalistic Practices in European Digital Mediascapes. *Journalism*, 21(11), 1630–1654. <https://doi.org/10.1177/1464884917743176>
- Peruško, Z., Čuvalo, A., & Vozab, D. (2017b). News as a democratic resource: Q study approach to cross-media news repertoires in Croatia. *Participations*, 14(2), 344–363.
- Peruško, Z., Perišin, T., Topić, M., Vilović, G., & Zgrabljic Rotar, N. (2011). *Hrvatski medijski sustav prema UNESCO-ovim indikatorima medijskog razvoja*. Fakultet političkih znanosti Sveučilišta u Zagrebu.
- Peruško, Z., Vozab, D., & Čuvalo, A. (2013). Audiences as a source of agency in media systems: Post-socialist Europe in comparative perspective. *Mediální Studia*, 2, 137–154.

- Peruško, Z., Vozab, D., & Čuvalo, A. (2015). Digital Mediascapes, Institutional Frameworks, and Audience Practices Across Europe. *International Journal of Communication*, 9(1), 342–364. <https://www.researchgate.net/publication/289990054DigitalMediascapesInstitutionalFrameworksandAudiencePracticesAcrossEurope>
- Peruško, Z., Vozab, D., & Čuvalo, A. (2021). *Comparing Post-Socialist Media Systems: The Case of Southeast Europe*. Routledge.
- Pjesivac, I., & Imre, I. (2018). Perceptions of Media Roles in Serbia and Croatia: Does News Orientation Have an Impact? *Journalism studies*, 20(13), 1864–1882. <https://doi.org/10.1080/1461670X.2018.1539627>
- Plenković, M. (2020). Upotreba dnevnoinformativnih portala, neka individualna obilježja i prihvaćanje populizma kod studenata Sveučilišta u Zagrebu. *Društvena istraživanja*, 29(4), 511–533. <https://doi.org/10.5559/di.29.4.01>
- Popović, V. (2004). HTV – javna televizija? Programsko vijeće HRT-a – institucija javnoga nadzora ili političke kontrole? *Politička misao*, 41(2), 17–29. <https://hrcak.srce.hr/22802>
- Potočnik, D. (2006). Posjedovanje i korištenje informacijske i komunikacijske tehnologije. In V. Ilišin (Ed.), *Mladi između želja i mogućnosti* (pp. 141–163). Institut za društvena istraživanja. <http://idiprints.knjiznica.idi.hr/555/1/Mladi%20između%20želja%20i%20mogućnosti.pdf>
- Povjerenik za informiranje. (2020). *Izješće o provedbi Zakona o pravu na pristup informacijama za 2019 godinu*. <https://www.pristupinfo.hr/wp-content/uploads/2020/03/Izješće-o-provedbi-ZPPI-za-2019.pdf?x57830>
- Pravna klinika. (2020). *Širenje lažnih vijesti i posljedice*. Pravna klinika Pravnog fakulteta u Zagrebu. <http://klinika.pravo.unizg.hr/content/sirenje-laznih-vijesti-i-posljedice>
- Prerad, D. (2022, January 12). Adrijana Cvrtila najavljuje pravnu bitku jer su joj ukinuli radno mjesto. *Večernji list*. <https://www.vecernji.hr/vijesti/adrijana-cvrtila-najavljuje-pravnu-bitku-je-su-joj-ukinuli-radno-mjesto-1554464>
- Pučka pravobraniteljica [Ombudswoman]. (2020). *Izješće pučke pravobraniteljice za 2019*. Republika Hrvatska, Pučki pravobranitelj. <https://www.ombudsman.hr/hr/download/izvjesce-pucke-pravobraniteljice-za-2019-godinu/?wpdmdl=7580&refresh=62d1cc9745dbe1657916567>
- Pučka pravobraniteljica [Ombudswoman]. (2021). *Izješće pučke pravobraniteljice za 2020*. Republika Hrvatska, Pučki pravobranitelj. <https://www.ombudsman.hr/hr/download/izvjesce-pucke-pravobraniteljice-za-2020-godinu/?wpdmdl=10845&refresh=62d1cc80ef3991657916544>
- Ragin, C. C. (2008). *Redesigning Social Inquiry: Fuzzy Sets and Beyond*. University of Chicago Press.
- Rajko, A. (2007). Neke dvojbe u vezi s primjenom novog Zakona o tajnosti podataka. *Hrvatska i komparativna javna uprava*, 7(3), 553–562. <https://hrcak.srce.hr/135342>
- Rajko, A. (2012). Pristup novinara informacijama javnog sektora. *Hrvatska i komparativna javna uprava*, 12(2), 555–572. <https://hrcak.srce.hr/132552>
- Rajko, A. (2015). Razlozi neizvršenja odluka upravnog suca i sredstva pravne zaštite u slučaju neizvršenja. *Zbornik radova Pravnog fakulteta u Splitu*, 52(1), 243–258. <https://hrcak.srce.hr/138147>
- Reporters Without Borders (RSF). (2022). *The ranking*. <https://rsf.org/en/ranking>
- Rihtar, S., Milas, G., & Burušić, J. (2000). Izloženost televiziji i percepcija političkog prostora. *Društvena istraživanja*, 9(4–5), 48–49. <https://hrcak.srce.hr/31547>
- Roksandić Vidlička, S., & Mamić, K. (2018). Zloupotreba društvenih mreža u javnom poticanju na nasilje i mržnju i širenju lažnih vijesti: potreba transplantiranja njemačkog Zakona o jačanju provedbe zakona na društvenim mrežama? *Hrvatski ljetopis za kaznene znanosti i praksu*, 25(2), 329–357. <https://hrcak.srce.hr/218951>
- Roller, V. (2014). Novo doba televizije u Hrvatskoj: Žanrovi, publika i javni interes. *Politička misao*, 51(4), 142–171. <https://hrcak.srce.hr/135839>

- Šalković, H. (2000). Hrvatska televizija u transformaciji prema modelu javne televizije – iluzija ili realnost? *Medijska istraživanja*, 6(1), 19–39. <https://hrcak.srce.hr/23371>
- Skoko, B., & Bajs, D. (2007). Objavljivanje neistina i manipuliranje činjenicama u hrvatskim medijima i mogućnosti zaštite privatnosti, časti i ugleda. *Politička misao*, 44(1), 93–116. <https://hrcak.srce.hr/20149>
- Šošić, D. (2019). Utjecaj društvenih mreža kao izvora vijesti na središnji informativni program javne i komercijalnih televizija (HRT, Nova TV i RTL) [Doctoral dissertation]. Sveučilište Josipa Jurja Strossmayera u Osijeku.
- Stetka, V. (2012). From Multinationals to Business Tycoons: Media Ownership and Journalistic Autonomy in Central and Eastern Europe. *The International Journal of Press/Politics*, 17(4), 433–456. <https://doi.org/10.1177/1940161212452449>
- Sztompka, P. (1993). *The Sociology of Social Change*. Blackwell.
- The Constitution of the Republic of Croatia [Ustav Republike Hrvatske]. *Narodne novine*, 56/90, 135/97, 08/98, 113/00, 124/00, 28/01, 41/01, 55/01, 76/10, 85/10, 05/14. <https://www.zakon.hr/z/94/Ustav-Republike-Hrvatske>
- UNESCO. (2013). *Global Media and Information Literacy Assessment Framework: Country readiness and competencies*. United Nations Educational, Scientific and Cultural Organization. <https://unesdoc.unesco.org/ark:/48223/pf0000224655>
- Unić, D., Mikelić Preradović, N., Sudarević, A., & Boras, D. (2014). The School Library as a Promoter of Multimedia Literacy in Primary Education in Croatia. In S. Kurbanoglu, S. Špiranec, E. Grassian, D. Mizrachi, & R. Catts (Eds.), *Information Literacy. Lifelong Learning and Digital Citizenship in the 21st Century* (pp. 612–621). Springer International Publishing.
- Vajda Halak, Ž., Romić, D., & Tršinski, Z. (2016). Pravo na pristup informacijama javne uprave u Republici Hrvatskoj i postupak zaštite ostvarivanja toga prava. *Mostariensia*, 20(1–2), 227–238. <https://hrcak.srce.hr/170909>
- Vanek, K. (2021). Media literacy at the county councils of experts in Croatia: The perspective of senior advisors for primary education. *Contemporary Educational Researches Journal*, 11(3), 68–77. <https://doi.org/10.18844/cej.v11i3.5902>
- Vilović, G. (2009). Veliki naponi, slabi rezultati. *MediAnali*, 3(6), 233–238. <https://hrcak.srce.hr/44552>
- Volarević, M., & Bebić, D. (2013). Društvene mreže kao izvor vijesti u najgledanijim središnjim informativnim emisijama u Hrvatskoj. *Medijske studije*, 4(8), 60–75. <https://hrcak.srce.hr/118047>
- Vozab, D. (2014). Tisak u krizi: Analiza trendova u Hrvatskoj od 2008. do 2013. *Medijske studije*, 5(10), 139–147. <https://hrcak.srce.hr/135683>
- Vozab, D. (2017). Pristrani i neprijateljski mediji te polarizacija u novom medijskom okolišu. *Političke analize*, 8(30), 3–9. <https://hrcak.srce.hr/184730>
- Vozab, D. (2019a). *(Ne)informirani građani. Politička participacija u novom medijskom okolišu*. Jesenski i Turk.
- Vozab, D. (2019b). Generational Patterns of Digital News Consumption: From Traditionalists to Millennial Minimalists. *Medijske studije*, 10(20), 107–126. <https://doi.org/10.20901/ms.10.20.6>
- Vozab, D., & Peruško, Z. (2017, June 29). *Izveštaj o digitalnim vijestima 2017: Izvori vijesti, povjerenje, polarizacija i korisnici društvenih medija*. Centar za istraživanje medija i komunikacije. <https://cim.fpzg.unizg.hr/2017/06/29/izvjestaj-o-digitalnim-vijestima-2017-izvori-vijesti-povjerenje-polarizacija-i-korisnici-drustvenih-medija/>
- Vozab, D., & Peruško, Z. (2018). Izvori informiranja o politici kao moderatori postizbornih očekivanja građana: parlamentarni izbori 2016. *Društvena istraživanja*, 27(3), 453–472. <https://doi.org/10.5559/di.27.3.04>
- Vozab, D., & Peruško, Z. (2021). *Digitalne publike vijesti u Hrvatskoj 2017.-2021*. Centar za istraživanje medija i komunikacije – Fakultet političkih znanosti Sveučilišta u Zagrebu.

<https://cimfpzg.files.wordpress.com/2021/06/digital-news-izvjestaj-hrvatska-2017-2021-za-web-1.pdf>

Vozab, D., & Zember, A. (2016). Croatia: Does equality in representation lead to equality in content? In K. Ross & C. Padovani (Eds.), *Gender Equality and the Media: A Challenge for Europe* (pp. 72–82). Routledge.

Vozab, D., Peruško, Z., & Čuvalo, A. (2017). Treći medijski sektor iz perspektive demokratski angažiranih publika. *Politička misao*, 54(3), 108–132. <https://hrcak.srce.hr/186455>

World Bank. (2022, October 12). *The World Bank in Croatia: Overview*. <https://www.worldbank.org/en/country/croatia/overview#3>

Zgrabljic Rotar, N. (2003). Hrvatska medijska politika i javni mediji. *Medijska istraživanja*, 9(1), 59–75. <https://hrcak.srce.hr/23325>

Zgrabljic Rotar, N., & Vrljević Šarić, Đ. (2009). The Croatian Journalism Education Landscape. In G. Terzis (Ed.), *European Journalism Education* (pp. 369–382). Intellect.

Žlof, K., Herljević, Z., & Hadžić, S. (2014). Predodžbe novinara o važnosti društvenih mreža u proizvodnji medijskih sadržaja. *Mediji, kultura i odnosi s javnošću*, 5(1), 17–29. <https://hrcak.srce.hr/122433>

