



RESILIENCE:
For Media Free of Hate and Disinformation

**THE POLITICAL AND ECONOMIC
FOUNDATIONS OF THE MEDIA
AND COMMUNICATIONS IN
MONTENEGRO THAT SPREAD
HATRED, PROPAGANDA AND
DISINFORMATION**

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MONTENEGRO

RESILIENCE : For Media Free of Hate and Disinformation

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THE POLITICAL AND ECONOMIC FOUNDATIONS OF THE MEDIA AND COMMUNICATIONS IN MONTENEGRO THAT SPREAD HATRED, PROPAGANDA AND DISINFORMATION

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1. INTRODUCTION

The development of technology and global political and economic events have brought about a change in how the public is informed and how the media operates, making them vulnerable to hate speech, disinformation and propaganda. Often failing to meet a minimum of professional standards, the content shapes the opinion of the public and indirectly undermines the core values around which democratic societies are built. In facing the challenge of the “infodemic” currently gripping the entire world, the question of who owns and funds different types of media and communication practices that either create or help spread hate speech, propaganda and disinformation¹ becomes an important issue, as well as what centres of power are establishing and controlling them or influencing their work and the content they release.

In Montenegro, the media are facing the problems of financial sustainability and a decline in the quality of professional standards², making them vulnerable to hate speech, disinformation and propaganda. Along with this, there is a strong presence of media from neighbouring countries in Montenegro’s media space, which, thanks to the countries of the region using a common language, release content which often fails to meet a minimum of journalistic standards.

There is a strong presence of media from neighbouring countries in Montenegro’s media space.

¹ Spreading hate speech is classified as the criminal offence of instigating national, racial and religious hatred and intolerance, used to engage in socially unacceptable public speech spreading prejudice, stigmatizing and demeaning certain social groups, especially minority and vulnerable groups, and does not know any boundaries. Pavlović, Pavle, *Ethical Dilemmas in Reporting on Election Campaigns Containing Elements of Hate Speech*, Montenegro Media Institute, 2018. Available at: <https://bit.ly/2AFzZma>. Accessed on: 18 June 2020.

Classified as disinformation are such media reports that combine facts and untrue or half-true information. Methodology of the fact-checking platform Raskrnkavanje.me. Available at: <https://www.raskrnkavanje.me/metodologija>. Accessed on: 18 June 2020.

Propaganda represents any form of deliberate and organized activities taken with the purpose of influencing attitudes, opinions or emotions of the public, groups or individuals, in order to win them over to the ideas, notions and programmes of social or political organizations engaging in such activities. Šćekić, Radenko, *A Review of Propaganda Development*, Podgorica, Matica Crnogorska, 2017. Available at: <https://bit.ly/3fEtMWv>. Accessed on: 18 June 2020.

² IREX, *Media sustainability index 2019*, Washington, 2020. Available at: <https://bit.ly/2XkNi2w>. Accessed on: 26 June 2020.

Through the project RESILIENCE – Civil Society For Media Free of Hate and Disinformation, funded by the EU and implemented in Montenegro by the Montenegro Media Institute, the South East Europe Network for Professionalization of Media (SEENPM) decided to analyze the political and economic aspects of different types of media and communication practices creating and spreading hate speech, disinformation and propaganda. Based on a unique methodology, developed by the Peace Institute from Ljubljana, the research is carried out in seven countries of the Western Balkans and Turkey.

Media and communication practices releasing such content are identified based on several aspects – ownership structure, mode of funding, relationship with the audience, editorial and journalistic structures and the content they are releasing.

For each of these aspects, a list of criteria has been prepared that provides us with an answer to the question of what kind of political and economic background there is for the spreading of hate speech, disinformation and propaganda in the media and on communication platforms.

The objective of this analysis is to provide institutions, civil society organizations, the media community and citizens with a better insight into the types and classification of media and communication practices through the content of which hate speech, disinformation and propaganda are spread, as well as to provide the public with a credible analysis, to serve as the basis for further activities of the SEENPM in building society's resilience to such phenomena.

The analysis was carried out in several stages:

- first stage – description of the media environment in Montenegro, with an emphasis on types and models of media and communication practices that spread hate speech, disinformation and propaganda,
- second stage – mapping of concrete examples of types and models of such media and communication practices and the analysis of individual examples and preparing conclusions and recommendations for improvements.
- This analysis mostly covered the events on the Montenegrin and regional media scenes over the past year. No special content monitoring was carried out for this analysis. Instead, we based our conclusions on publicly accessible relevant research by international and domestic institutions and organizations, decisions of regulatory bodies and findings of fact-checking platforms.

With the intention to initiate a discussion and reflection on the issues we research, we base the analysis of types and models of media and communication practices that spread hate speech, disinformation and propaganda on interviews with counterparts possessing journalistic and editorial experience or civic activists with long years of experience in the media. We have presented to them the criteria based on which we make assessments of the media and thus obtained their viewpoints and experience³.

³ We interviewed: Milka Tadić-Mijović (president of the Centre for Investigative Journalism), Milica Babić (editor of the RTCG Morning Show), Darko Šuković (editor in chief of Antena M), Jadranka Vojvodić (assistant

2. MEDIA ENVIRONMENT AND PRACTICES IN MONTENEGRO

There are around 150 electronic, online and print media currently operating in Montenegro.⁴ The media market is small and difficult to keep sustainable.⁵ Many privately owned, but also public, media have been continuously facing financial adversity. Over the past couple of years, the value of the commercial advertising market has been assessed at around €11m. At the same time, there is no accurate information about what portion of it is controlled by the state and local administrations but the Direct Media company, from Montenegro, assessed that the participation of state-owned assets on this market is around €2m.⁶ The revenues from advertising in themselves cannot secure the sustainability of the media—TV stations receive half of the revenues from advertising, Twenty-five per cent is spent on on-street advertising, and 10% on online advertising, while the rest goes to printed and other media.⁷

The civil sector has been highlighting the problem of non-transparent advertising, which brings the media into an uneven position, as government funds for advertising are mostly funnelled towards media that do not take a critical stance towards the authorities⁸. Journalists still make less than the average monthly salary, and one in every three journalists earns less than €400 a month.⁹ Montenegrin public broadcaster, Radio and Television of Montenegro (RTCG) has the most employees (723), and it had a budget of more than €14m last year.¹⁰ The State aided the media occasionally, by writing off debts that privately owned broadcasters had towards the Radio Broadcasting Centre.¹¹ Assistance for the media sector in Montenegro is also planned in terms of mitigating the adverse economic effects caused by the coronavirus pandemic.¹² The public has not been informed about the dialogue between the representatives of the Government and the media

director of the Agency for Electronic Media), Goran Đurović (director of Media centar). The interviews took place in Podgorica, in the period between 3 June and 12 June 2020.

4 IREX, *Media sustainability index 2019*, Washington, 2020. Available at: <https://bit.ly/2XkNi2w>. Accessed on: 23 May 2020.

5 JUFREX, *Analysis of the Media Sector in Montenegro with Recommendations for Approximation to the Standards of the Council of Europe and the EU, 2017*, EU and Council of Europe. Available at: <https://bit.ly/2ZvfDWL>. Accessed on: 23 May 2020.

6 IREX, *Media sustainability index 2019*, Washington, 2020. Available at: <https://bit.ly/2XkNi2w>. Accessed on: 23 May 2020.

7 *Ibid.*

8 Nenezić, Ana, Vuković, Dragoljub, *Equal Opportunity for All Media in Montenegro – Annual report for 2016*, CGO, 2017 Available at: <https://bit.ly/2zZhbb0>. Accessed on: 23 May 2020.

9 Trade Union Media of Montenegro, *The Indicator of the Level of Media Freedoms and Safety of Journalists (Montenegro)*, 2018 Available at: <https://bit.ly/2uc5Ur9>. Accessed on: 23 May 2020.

10 Predrag Nikolić, "Survival of the Media in the Time of Coronavirus – from Bad to Worse", *Montenegro Media Institute*, 8 May 2020, Available at: <https://bit.ly/2A2zWjs>. Accessed on: 23 May 2020.

11 Government of Montenegro. *Information on assistance to commercial and local radio and TV broadcasters, adopted in the Government's March 2017 sitting*. Available at: <https://bit.ly/3ekNW7f>. Accessed on: 24 May 2020.

12 RTCG, "More than €250,000 to Support Media", 20 March 2020. Available at: <https://bit.ly/2Xopknd>. Accessed on: 24 May 2020.

2.1. A strong presence of regional media

about the forms of subsidies and assistance to the media.

The functioning of the media in Montenegro is made more difficult because of the strong influence of the robust competition from neighbouring countries on its media market and the polarization between market participants representing different parts of the political spectrum.¹³ Common language, shared by several countries from the former Yugoslavia region, and unlimited online space enable the media from other countries in the region to provide their content to the Montenegrin audience, thus enabling them to establish themselves as important stakeholders in the Montenegrin media market as well.¹⁴ Along with Srpski Telegraf, Informer, Kurir and Alo are the most read tabloids in Serbia, and released at least 945 false and unfounded reports on their front pages alone during 2019¹⁵.

Along with this, at the beginning of 2020, the Montenegrin Agency for Electronic Media (AEM) suspended the broadcasting of certain shows of some Serbian television stations, such as Happy TV and Pink TV, for three months, because “they were promoting hatred, intolerance and discrimination against Montenegrin nationals”.¹⁶

Regional media spreading disinformation are frequently the go-to source of information for the right-leaning portals from Montenegro (IN4S.net and Borba.me), which carry their releases without a prior fact-check. The reverse also happens when the right-leaning media from Montenegro create unverified content, which then gets re-released by the regional media spreading disinformation. Thus, it becomes possible for disinformation to reach a large number of people in the countries of the region.

Disinformation predominantly occurs in Montenegro in the unregulated online space.

During 2019, the analyses of fact-checking platforms indicated that disinformation occurred only occasionally in traditional Montenegrin media—press, television and radio—with the assumption that the journalists working in these media had more time to do the fact-checking and that these media still have clearly defined editorial procedures.¹⁷

Disinformation predominantly occurs in Montenegro in the unregulated online space.¹⁸ Therefore, we are predominantly addressing online media and

13 JUFREX, *Analysis of the Media Sector in Montenegro with Recommendations for Approximation to the Standards of the Council of Europe and the EU 2017*. Available at: <https://bit.ly/2ZvfDWL>. Accessed on: 23 May 2020.

14 *Analyses of fact-checking platforms Raskrinkavanje.ba*. Available at: www.raskrinkavanje.ba. Accessed on: 23 May 2020.

15 Krik, *At Least 945 False New Stories on the Front Pages of Tabloids in 2019*. Available at: <https://bit.ly/2XISldM>. Accessed on: 23 May 2020.

16 Agency for Electronic Media, *Council Suspended Re-Broadcasting of Certain Programme Contents on Happy TV and Pink M TV, 10 February 2020*. Available at: <https://bit.ly/2HsW0nH>. Accessed on: 23 May 2020.

17 Dragan Koprivica, Milica Bogdanović, *Infection with Manipulation, CDT, 2019*. Available at: <https://bit.ly/2LWbdQo>. Accessed on: 23 May 2020.

18 *Ibid.*

2.2. There are no false narratives in the established media

platforms in this analysis.

The online space defined by a common language is what dictates that every piece of information from Montenegro reaches the media in other countries of the region in a matter of minutes and vice versa. During this transfer of information, without any fact-checking or source credibility checks, it also happens that established Montenegrin media release an unchecked piece of information, thus partaking in the process of spreading disinformation.

The analyses of domestic fact-checking platforms do not recognize established Montenegrin media¹⁹ as creators of disinformation, hate speech or propaganda.²⁰ Nevertheless, it happens that Montenegrin established media too release a piece of information without a due accuracy or source credibility check, thus participating in the process of spreading disinformation.

Some of those with whom we communicated see the “Radio and Television of Montenegro (RTCG) as a prime example of a ruling party’s propaganda tool”. International institutions and part of the Montenegrin public have been trying for years to draw attention to the problem of unlawful political influence on the public broadcaster.

Crisis events in Montenegro, during 2020, such as the reporting on the events surrounding the adoption of the law on freedom of religion, showed that biased reporting and insufficient adherence to ethical standards occur more frequently in Montenegrin established media than the deliberate creation of disinformation and false narratives. During the coronavirus pandemic, there were several oversights in their work, caused by mistakes, lack of editorial capacities or the need for access to a broader audience, not by the desire to create certain false narratives or false representations of reality.²¹

2.3. The unregulated online space

The fact that online media in Montenegro are not legally obliged to register benefits the spread of disinformation, hate speech and propaganda in the online space. The AEM is keeping a registry of electronic publications, but registration is still voluntary.

19 We define established media as those that have become relevant sources of information over an extended period of media content production, and a place for debate on topics of public interest, that is, those media with a significant audience, influence and resources. For the purposes and intent of this analysis, we placed RTCG, Vijesti TV, Prva TV and Nova M in that category, as well as the newspapers Pobjeda, Dan, Vijesti, Dnevne Novine and online media Vijesti, and the Analitika and Antena M portals.

20 Bogdanović, Milica, Koprivica, Dragan, *Infection with Manipulation*, CDT, 2019. Available at: <https://bit.ly/2LWbdQo> Accessed on: 23 May 2020.

21 Dragan Koprivica, Milica Kovačević, Tijana Velimirović, *The Network of Disinformation and the Inadequate Response of the State*, CDT, 2020. Available at: <https://bit.ly/2zZ5U0a>. Accessed on: 23 May 2020.

Unlike online media, the electronic media are not only obliged to register but also to supply information on their ownership structure to the AEM.²² There is a significant portion of foreign ownership in the biggest and most influential Montenegrin media.²³

It cannot be clearly determined whether there is any foreign ownership in the two online media in Montenegro identified in expert analyses as platforms spreading disinformation and propaganda. The information in the online impressum of the IN4S.net portal does not correspond with the name of the person mentioned in public as the editor of this medium.²⁴ It is stated in the impressum of the Borba.me portal that the owner and founder of the portal is the NGO Zapis Podgorica (Podgorica Record) and that Dražen Živković is the authorized representative.²⁵

2.4. Social networks as a source of unethical content

At the same time, social networks, an important source of information for Montenegrin citizens,²⁶ are the source of information for the media releasing disinformation, hate speech and propaganda. Social networks are simultaneously the platform via which those media release the content, which the citizens then share, thus enabling ethically disputable content to reach the broadest audience possible.

Social networks, an important source of information for Montenegrin citizens, are the source of information for the media releasing disinformation, hate speech and propaganda.

In crisis situations, such as the events surrounding the adoption of the law on freedom of religion and the coronavirus pandemic, social networks became a place for spreading hatred, disinformation, conspiracy theories and advice that is not always rooted in science and can be harmful to people's health.²⁷ Such information was also being spread through communication applications, such as Viber. In the time of the pandemic, Facebook, Twitter and Instagram started removing posts created by the disinformers from the region²⁸.

22 JUFREX, *Analysis of the Media Sector in Montenegro with Recommendations for Approximation to the Standards of the Council of Europe and the EU 2017*. Available at: <https://bit.ly/2ZvfDWL>. Accessed on: 23 May 2020.

23 *Overview of information on the transparency of AVM services providers in Montenegro, Agency for Electronic Media*. Available at: <https://bit.ly/2A2XpkJ>. Accessed on: 23 May 2020.

24 *Information on IN4S.net portal published on the official page*. Available at: <https://www.in4s.net/impressum/>. Accessed on: 23 May 2020.

25 *Information on the Borba.me portal published on the official page*. Available at: <https://borba.me/impressum/>. Accessed on: 23 May 2020.

26 NDI, *Public opinion poll, November 2018*, Washington. Available at: <https://bit.ly/2E2dzJA>. Accessed on: 23 May 2020.

27 Dragan Koprivica, Milica Kovačević, Tijana Velimirović, *The Network of Disinformation and the Inadequate Response of the State, CDT, 2020*. Available at: <https://bit.ly/2zZ5U0a>. Accessed on: 23 May 2020.

28 *Ibid.*

2.5. Disputed regulator, inadequate self-regulation

Activities of regulators in suppressing the spreading of hate speech were recorded by the beginning of 2020, when the AEM limited the re-broadcasting of certain content on Serbian Happy TV and Pink M TV for three months.

The civil sector in Montenegro claimed that “the AEM Council had been tolerating serious violations of professional standards to the detriment of the opponents of the Montenegrin regime for years, which had been occurring through Pink M broadcasts, resorting only to warnings after numerous complaints, repeating this same process over and over again, although the rationale for each such decision stated that the next one would be more punitive.²⁹ However, no such harshness was ever displayed until the lack of professionalism on some TV stations started harming the authorities themselves.”³⁰

The media community is divided, and that has had an adverse effect on the possibility of establishing a functional collective self-regulatory body. Several Montenegrin media have their own media ombudsman.

2.6. No strategic approach to combating disinformation

Montenegro has no strategy for combating disinformation.

Journalists of the FOS Media web portal³¹ and the editors of IN4S.net and Borba.me portals, Gojko Raičević and Dražen Živković,³² were arrested at the beginning of 2020 for the crime of causing panic and disorder by publishing false news without a previous fact-check.

The trend of institutions, which, for the most part, have fact-checking platforms, taking on the role of “fact-checkers” is also present. Instead of publishing denials, these institutions are announcing that releases by certain media are false news.

2.7. Women run half of all media

Research shows that women make up the majority of employees in the

29 Duško Vuković, Daliborka Uljarević, *Media in Montenegro – Caught Between the Grip of Power and the Fight for Profession*, CGO, 2020. Available at: <https://bit.ly/36pm3l6>. Accessed on: 23 May 2020.

30 *Ibid.*

31 Čađenović, Ivan, Nikolić, Biljana, “Detention ordered: FOS Media journalist suspected of causing panic and disorder”, *Vijesti online*, 6 January 2020. Available at: <https://bit.ly/3eu0Tft>. Accessed on: 24 June 2020.

32 Čađenović, Ivan, “Raičević and Živković released pending trial”, *Vijesti online*, 3 January 2020. Available at: <https://bit.ly/3hYu2RS>. Accessed on: 24 June 2020.

established media in Montenegro and that half of them occupy leading positions. However, they do not have full autonomy in making decisions from their, mostly male, media owners.³³

Women occupy 50% of directorial and editorial positions, while they make 60% of lower-ranking desk editors.³⁴ Although women run the media, media content still contains stereotypes about women and supports gender roles corresponding to patriarchy, failing to contribute sufficiently to the establishment of gender equality in society.³⁵

Women employed in media that spread hate speech, disinformation and propaganda are frequently victims of gender-based prejudice and harassment. Women are also frequently a target for derogatory speech and harassment in online media comments and on social networks.

33 Pejović, Duška, *The Position of Women Journalists in Montenegrin Media*, Association of Professional Journalists of Montenegro, 2019. Available at: <https://bit.ly/2Nwj1t9>. Accessed on: 26 June 2020.

34 *Ibid.*

35 Pejović, Duška, *The Gender Image of the Media in Montenegro*, UNDP, 2016. Available at: <https://bit.ly/3ewm4NP>. Accessed on: 26 June 2020.

3. MAPPING OF CONCRETE EXAMPLES OF MEDIA AND COMMUNICATION

Having in mind the typical elements of hatred, disinformation and propaganda models of the media and media communications we analyzed, based on a series of indicators, we recognized multiple media and media communication practice types in Montenegro. Belonging to the first group are the regional media, read throughout Montenegro, followed by the right-leaning online media from Montenegro and Facebook pages, serving as “hotbeds” of hate speech. The second group comprises online media from Montenegro, whose comment sections have become a space for spreading hate speech and disinformation.

3.1. Regional sources of hatred and disinformation

Media from other countries of the region, whose online editions have a large readership in Montenegro, continuously report on events in Montenegro, often using hate speech, disinformation and propaganda as the foundation of their content. According to media reports from February 2020, the European External Action Service (EEAS) concluded that the disinformation related to the adoption of the law on freedom of religion raised tensions and most of the false news about this issue originated from Serbian media. Also, the EEAS said that Serbian media, some of which state-owned, the Russian Serbian-language medium Sputnik and several portals from Montenegro were the sources of false information.³⁶

During the period of the breakout of the Covid-19 pandemic, the Serbian media “temporarily ceased their campaign against Montenegro”, but it continued with undiminished intensity during the 14th anniversary of the renewal of Montenegrin independence, as well as after the Montenegrin authorities decided not to allow the citizens of Serbia, among other countries, entrance to Montenegro during the coronavirus pandemic, until their country met the required epidemiological criteria.³⁷

Serbian tabloids and their online editions, among which Alo.rs and Kurir.rs have the biggest readership in Montenegro, are spreading disinformation about Montenegro.³⁸ Since 2017, the newspaper Alo and its online edition Alo.rs has been the private property of the Alo Media System company, owned by Saša Blagojević. Since 2018, he has been the owner of Belgrade’s RTV Studio B, via his company Global Media Technology. The Serbian public

36 RTCG, EU recognized and condemned disinformation campaign, 20 February 2020. Available at: <https://bit.ly/2NJJ7ZD>. Accessed on: 30 June 2020.

37 Gruhonjić, Dinko, *Tabloid Attacks on Montenegro*, Montenegro Media Institute, 2020. Available at: <https://bit.ly/2BdYlhK>. Accessed on: 30 June 2020.

38 Overview of the most visited websites in Montenegro <https://www.similarweb.com/top-websites/montenegro>. Accessed on: 24 June 2020.

does not know much about him, as he is relatively new to the media market, but Serbian media have reported that Saša Blagojević was close to the ruling Serbian Progressive Party.³⁹ Alo sells 45,652 copies a day.⁴⁰

In 2003, Radisav Rodić established Kurir. This newspaper plays an important role in the tabloidization of the Serbian media by fabricating political affairs and spreading incorrect information.⁴¹ This newspaper and its online edition Kurir.rs are now part of the Adria Media Group, officially owned by Igor Zezelj. Since its establishment, Kurir has changed its editorial policies several times, but it has remained the voice of the Serbian government for the most part.⁴²

The Journalists' Association of Serbia (UNS) established that the Adria Media Magazine and Adria Media Group were the publishers of a total of 28 media outlets registered in the Media Registry. Apart from these media, Adria Media Group owns another 13 media that are not registered with the Serbian Business Registers Agency (SBRA).⁴³ The owner of Kurir is active in other fields of business as well (pharmacy and medical equipment)⁴⁴. Kurir sells 41,223 copies in Serbia, while the online edition has 2.43 million views.⁴⁵

When it comes to transparency of ownership and editorial structure, both Alo⁴⁶ and Kurir⁴⁷ publish information on editors and journalists on their websites, as well as the information on the companies owning these media.

Sources of funding for these two media originate from state funds. According to experts, the system of distribution of money through public competitions has enabled Serbian authorities to influence the editorial policies and financial sustainability of the media.⁴⁸ Despite their constant unprofessional reporting, these media continue to receive millions through public competitions for funding media content.⁴⁹

According to the analysis that the Journalists' Association of Serbia (UNS) carried out, in the first half of 2019, tabloids received a total of 27.5 million dinars, or around €250,000, while the Independent Journalists' Association of

39 BIRN, *Media Ownership Monitor, Belgrade, 2017*. Available at: <https://bit.ly/3hYSy5h>. Accessed on: 24 June 2020.

40 Hodžić, S. and Petković, B. (2020). *Sustainability of Professional Journalism in the Media Business Environment of the Western Balkans*. Report submitted for publication. Skopje: EU TACSO 3 Project.

41 BIRN, *Media Ownership Monitor, Belgrade, 2017*. Available at: <https://bit.ly/3ezlKOM>. Accessed on: 24 June 2020.

42 *Ibid.*

43 Pešić, J., Igor Zezelj took over 41 media in Serbia, *Journalists' Association of Serbia*, 18 January.2019. Available at: <https://bit.ly/31aH0pH>. Accessed on: 24 June 2020.

44 Hodžić, S. and Petković, B. (2020). *Sustainability of Professional Journalism in the Media Business Environment of the Western Balkans*. Report submitted for publication. Skopje: EU TACSO 3 Project.

45 *Ibid.*

46 Official Alo webpage. Available at: <https://bit.ly/3hRbVNT>. Accessed on: 24 June 2020.

47 Official Kurir webpage. Available at: <https://www.kurir.rs/impressum>. Accessed on: 24.06.2020

48 Popović, Pea, *Media: How Serbia Sponsors Violence and Lies*, Noizz.rs, 16.01.2020. Available at: <https://bit.ly/3846YNe>. Accessed on: 24 June 2020.

49 *Ibid.*

Serbia (NUNS) said that 155 public competitions for the co-funding of public reporting were announced in 2019, in which more than 1.6 billion dinars was distributed, most of it among pro-regime media.⁵⁰

Contracts with public enterprises, agencies and the advertising and marketing authority are an important source of income for tabloids in Serbia. For example, in 2019, the publisher of the Alo tabloid had at least 15 contracts, worth a little over 28 million dinars (close to €240,000).⁵¹ Kurir got a little less than 13 million dinars (around €110,000), mostly through the contract with the Electric Power Industry of Serbia (EPS) and the public broadcaster, Radio Television of Serbia (RTS).⁵²

Editors and journalists of these media do not adhere to professional standards and frequently violate the ethical code, as indicated by the Serbian Press Council's monitoring.⁵³

Judging by the content these media are releasing, their work is propagandist in nature. Their content is subject to frequent analyses of fact-checking platforms in several former Yugoslavian countries. They often release ungrounded information or news impossible to fact-check or news from which the facts necessary for the understanding of the context are omitted, conspiracy theories, and announcements in which the only source of the presented claims is anonymous. These media often target members of different minority groups, political and ideological opponents, civil society activists and international stakeholders, such as NATO, EU, US embassies. On the other hand, the civil society organizations carrying out analyses of media content and media monitoring indicate that these media are issuing predominantly positive reports about the Serbian President Aleksandar Vučić and Russian President Vladimir Putin.⁵⁴

These media often target members of different minority groups, political and ideological opponents, civil society activists and international stakeholders, such as NATO, EU, US embassies.

Alo is also known for its war propaganda. In almost two-thirds of the headlines on the conflict between Serbs and Albanians, this medium suggests the necessity of police, military or paramilitary intervention. Last year, Alo released at least 237 false or manipulative reports, on 358 front pages. Some of the most prominent false reports were the announcements of World War Three and several attempted assassinations of the Serbian President Aleksandar Vučić, as well as the incessant warnings about Albanians getting ready for

50 Danas.rs, *UNS Research: Money in Public Competitions Still Goes to Media Breaching Code of Ethics*, UNS, on 25 May 2020. Available at: <https://bit.ly/31dl7q2>. Accessed on: 24 June 2020.

51 Radojević, Vesna, *More than half a million euros for false news spreading tabloids*, Raskrikavanje.rs, 13 February 2020. Available at: <https://bit.ly/2B32k50>. Accessed on: 24 June 2020.

52 Ibid.

53 Đurić, Vanja, *Press Council: Around 5,000 cases of violations of the Code of Ethics in the second half of 2019*, Danas online, 19.02.2020. Available at: <https://bit.ly/31bu6rB>. Accessed on: 24 June 2020.

54 Krik, *At least 945 false reports on tabloid front pages in 2019*. Available at: <https://bit.ly/2XISldM>. Accessed on: 23 May 2020.

war and attacks against Serbia.⁵⁵ This media organization has been depicting the NATO bombardment and similar historic events in a manipulative way.

It is not infrequently that these media spread disinformation about Montenegro, its institutions and public officials. The releasing of deliberately incorrect information is intensified in crisis situations, such as the coronavirus pandemic or the events surrounding the adoption of the law on freedom of religion.⁵⁶

3.2. Regional source of propaganda

Experts recognize Sputnik Serbia as the main channel of Russian influence in the Western Balkan media space, reaching audiences that speak Bosnian-Croatian-Montenegrin-Serbian language, and its releases are frequently carried by the local media.⁵⁷

Sputnik Serbia is part of the Sputnik news agency, with headquarters in Russia, founded by the Russian state-owned media group Rossiya Segodnya.⁵⁸ Sputnik has its own web portal, radio station and multimedia content. Regional branches of Sputnik exist in Washington, Beijing, Paris, Berlin, Belgrade, Cairo, London, Edinburgh, Montevideo, Rio de Janeiro, etc.⁵⁹ The Sputnik agency is the successor of RIA Novosti and the Voice of Russia radio broadcaster⁶⁰. The Belgrade office employs 40 people, and according to the editor in chief, Ljubinka Milinčić, it is funded with Russian state money and is not dependent on commercial income.⁶¹ It is not possible to find accurate information on the financing of this media on its official website.

Sputnik releases a significant quantity of information daily, placing photographic and video content at the disposal of local media with limited resources. That is why Sputnik is a very frequent source of information for the local media, regardless of their editorial policies on foreign policy issues.⁶²

In the analysis of the Montenegrin Atlantic Alliance, released by the NATO Strategic Communications Centre of Excellence, it is noted that Sputnik promotes such narratives as “the Western Balkans is unstable and there is great risk of conflicts breaking out”, “the EU is a hegemony”, “Western Balkan

55 *Fake News Seeker*, *Alo published 237 false reports on the front page in one year*. Available at: <https://bit.ly/37WQCpk>. Accessed on: 23 May 2020.

57 *Montenegrin Atlantic Alliance, Russia's Narratives Towards the Western Balkans: Analysis of Sputnik Serbia*, NATO Stratcom, 2020. Available at: <https://bit.ly/2Nn67xD>. Accessed on: 24 June 2020.

58 *Sputnik Serbia official website*. Available at: https://rs-lat.sputniknews.com/docs/about/o_nama.html. Accessed on: 30 June 2020.

59 *Ibid.*

60 *Nešić, Milan, Donceva: Russia is aspiring to deepen divisions in the Balkans with its narratives*, *Voice of America*. Available at: <https://bit.ly/3hWs2d0>. Accessed on: 12 May 2020.

61 *Vučičević, Bojan, The growing influence of global media in the region*, *Media Observatory*, 29 June 2016. Available at: <https://bit.ly/3i3TAgl>. Accessed on: 24 June 2020.

62 *Bogdanović, Milica, Kovačević, Milica, Analysis of Narratives – Almighty Russian Weapon*, 2019. Available at: <https://bit.ly/2B4GYVQ>. Accessed on: 24 June 2020.

countries are weak and corrupt”, “human rights are at risk”, “the EU and NATO are weak and disunited”, “NATO is aggressive and engages in provocations”, or “Montenegro wishes to revise history, NATO membership is not useful”.⁶³

After this report stating that Sputnik was trying to emphasize that the region was divided into a pro-Western and a pro-Eastern bloc was released, the media group’s editor in chief Ljubinka Milinčić denied this, claiming that “it was NATO’s influence that was malignant, not Sputnik’s”.⁶⁴ In a statement for the Journalists’ Association of Serbia (UNS), she said that it was a very general evaluation and that the entire report was written without a shred of evidence to back it up.⁶⁵

Over the past several years, Google, Facebook and Twitter have been sanctioning Sputnik—from denying it access to advertising to deplatforming it. By the beginning of 2019, Facebook had removed 289 pages and shut down 75 accounts associated with Sputnik for spreading disinformation.⁶⁶

3.3. Montenegrin sources of disinformation and propaganda

Based on the analysis of fact-checking platforms and interviews with experts, we recognized the right-leaning online media—IN4S.net and Borba.me—as domestic sources of disinformation and propaganda in Montenegro.

These media are not registered with the AEM as electronic publications. The Borba.me website states that the NGO Zapis Podgorice (Podgorica Record) is its founder and that Dražen Živković is its authorized representative. During this research, Živković said the “NGO Zapis Podgorica was only the owner of the Borba.me domain and that the portal itself was “a kind of a personal blog and that it is not currently registered as a media organization”.⁶⁷

Together with officials and activists of the anti-NATO oriented Democratic Front (DF), Živković was arrested during the 2015 protests, which this opposition alliance organized just before Montenegro officially joined NATO. Since the establishment of the Borba.me portal, the media has reported that Živković has been questioned on multiple occasions by the Prosecutor’s Office for the texts he published. At the beginning of 2020, he was arrested on suspicion of “committing the crime of provoking panic and disorder by publishing a false report that an explosion had shaken the Villa Gorica, in

63 *Montenegrin Atlantic Alliance, Russia’s Narratives Toward the Western Balkans: Analysis of Sputnik Serbia, NATO Stratcom, 2020. Available at: <https://bit.ly/2Nn67xD>. Accessed on: 24 June 2020.*

64 *Pešić, J., Milinčić: It’s NATO’s influence that’s malignant, not Sputnik’s, Cenolovka.rs, 28.05.2020. Available at: <https://bit.ly/2Z2z6Mx>. Accessed on: 24 June 2020.*

65 *Ibid.*

66 *Brezar, Aleksandar, THE PROPAGANDA NETWORKS OF LIES (II): Media under political influence release the most disinformation, Analiziraj.ba, 2019. Available at: <https://bit.ly/2YCjBvU>. Accessed on: 26 June 2020.*

67 *Interview with Dražen Živković conducted online, on 30 June 2020.*

Podgorica, without previously checking the information. The Police Authority, on the other hand, said that this information was false and that there had been “a minor electrical malfunction in the facility, which was quickly fixed”. As he was suspected of committing the same crime, Gojko Raičević, the editor in chief of the IN4S web portal, was arrested as well. Raičević was also arrested in autumn 2015, during the break-up of the DF protest in front of the Montenegrin Parliament building, when, according to media reports, he was brutally beaten.⁶⁸

During this research, Raičević said that “The IN4S.net web portal was established in 2008, by a group of friends and that NGO IN4S was established in 2010. He said that in both cases, he was the primary authorized representative and editor in chief of the portal.⁶⁹ His name is not listed in the impressum of this web portal.

As the president of the No to NATO, No to War movement, Raičević actively participated in the campaign against Montenegrin membership of NATO, in 2015. When advocates of Montenegrin membership of NATO made accusations about “certain NGOs receiving funds from abroad to run an anti-NATO campaign”, Raičević said that his organization was not receiving funds from Russia or any other foreign country.⁷⁰

There is no publicly accessible information on possible subsidies, grants and sponsorships or financial reports posted on these two media websites. Commercial advertising is present on the Borba.me website. Živković said he “had no advertisers on his website and that the present banners belonged to his relatives and friends owning businesses and advertising on his website for free.⁷¹

As Živković asserts, Borba.me has no editorial office or premises. He claims that the company is funded from the money he won in court after suing the newspaper Dan, for which he used to work.⁷² On the other hand, Raičević says that “IN4S has its own premises and a studio, but they are not in use, due to the pressure from the police and the Prosecutor’s Office”.⁷³ There is space on this web portal dedicated for advertising, but Raičević claims that there are no advertisers. As he claims, IN4S had a contract with the M:tel company, the Serbian Ministry of Foreign Affairs (Office for Diaspora) and the Serbian Ministry of Culture.⁷⁴ This web portal also won some funds in the competition for stimulating Serbian-language public reporting in the neighbouring countries, organized in 2018 by the Provincial Secretariat for

68 PCNEN, Božović: *Police brutally beat editor of IN4S portal, 17 October 2015*. Available at: <https://bit.ly/2Vza6LI>. Accessed on: 1 January 2020.

69 Interview with Gojko Raičević via the Viber mobile application, on 30 June 2020.

70 Portal Analitika, Raičević: *Russia is not funding us, we will continue the anti-NATO campaign, 29 April 2015*. Available at: <https://bit.ly/3dAdDvU>. Accessed on: 24 June 2020.

71 Interview with Dražen Živković via the Viber mobile application, on 30 June 2020.

72 Ibid.

73 The interview with Gojko Raičević took place via the Viber mobile application, on 30 June 2020.

74 Ibid.

Culture, Public Information and Relations with Religious Communities of the Autonomous Province of Vojvodina.⁷⁵

IN4S, one of the most visited websites in Montenegro, releases content which is often a combination of different journalistic forms, where facts are not clearly separated from comment. According to the experts we talked to, the incitement of hatred towards certain minority groups is recognizable in the content released on this website, as well as the manipulation of facts and photographic material, historical revisionism and campaigning against certain target groups and individuals.

The incitement of hatred towards certain minority groups is recognizable in the content released on this website, as well as the manipulation of facts and photographic material, historical revisionism and campaigning against certain target groups and individuals.

The portal targets different minorities (ethnic or religious), political and ideological opponents, civil activists, fighters for human rights, and international stakeholders, such as the EU, NATO, USA, etc. The publishing of such content intensifies during the period leading up to elections and while critical political decisions are being made or while there is a public debate on issues polarising society, such as Montenegro's membership of NATO or the adoption of the law on freedom of religion.

Fact-checking platforms often prove that texts published on IN4S contain falsified and distorted historical facts. The sources of this unverified data are sometimes political party officials or activists.

On the other hand, the Borba.me web portal often publishes texts based on anonymous sources, and it does not provide sufficient information to enable verification of the presented claims.

Participants in this research perceive these media as those associated with opposition parties. Živković denies this, claiming that Borba.me is exclusively associated with him as an oppositional and critical journalist. In contrast, Raičević claims that there is no cooperation between opposition parties and IN4S.net, although it is justified to think that the portal was closer to the opposition than the regime parties.

In the comments section, without any additional filtering, readers engage in debates abundant in problematic content. According to the experts we interviewed, additional spreading of disinformation and propaganda can be organized and coordinated by different interest groups.

Additionally, they use social networks as an important channel for disseminating the released information. IN4S has around 30 thousand followers on Facebook and Borba.me has around 13 thousand. For the most part, Facebook pages belonging to opposition parties or pro-Serbian and pro-Russian pages are sharing the information they post⁷⁶ and then this content is further commented on, without any moderation.

⁷⁵ Results of the competition organized by the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities of the Autonomous Province of Vojvodina, 2018. Available at: <https://bit.ly/3dOUqpf>. Accessed on: 1 July 2020.

⁷⁶ Findings of the <https://www.crowdtangle.com/> website

3.4. Facebook pages as conduits for hatred

The experts we interviewed indicate the problem of propagation of hate speech, disinformation and propaganda on social networks. Their intense use in recent years has opened up new channels for releasing content without any accountability. Furthermore, research carried out by civil society organizations shows that social networks served as support for the propagators of disinformation, especially during the coronavirus pandemic.⁷⁷ In a multitude of pages posting problematic content, several stand out for their frequent use of offensive speech or labelling of individuals. Such are, for example, Facebook pages like Stari Liberal (Old Liberal)⁷⁸, Nemojmo politizovati proteste (Let's Not Politicize Protests)⁷⁹, It was very unpleasant/Psalm 118⁸⁰, Dnevna Doza Crnogorskih Dubioza⁸¹, Milonegro⁸², etc.

The civil sector also recognizes these pages as participants in the disinformation campaign organized during the adoption of the law on freedom of religion. These pages were sharing so-called memes, “caricature-like compressed messages offered to audiences for consumption without prior critical scrutiny”, which served in the coordination of protests.⁸³

The content on these pages was aimed against public figures—politicians and civil activists against whom a continuous campaign was waged, accompanied by visual content and text containing offensive messages. Not infrequently, these pages post messages of hate speech against ethnic minorities and women. Such an example occurred towards the end of the coronavirus epidemic, when assistant director of the Institute of Public Health, Dr Senad Begić, “survived internet lynching”, because of his name and position.⁸⁴

It is unknown which organizations/structures are behind these pages, who owns them and how they are funded.

These Facebook pages have an average of 7–22 thousand followers. Followers share their content intensely and comment on them, thus increasing their visibility on social networks. Hate speech is additionally propagated through their comments sections, which are unmoderated.

It is unknown which organizations/structures are behind these pages, who owns them and how they are funded. In the opinion of our interviewees, based on the content they release, it can be inferred that they share viewpoints and ideas of the predominantly right-leaning opposition parties and interest groups.

77 Velimirović, Tijana, *Using urgent circumstances to spread dangerous narratives*, Raskrinkavanje.me, 2020. Available at: <https://bit.ly/3hTfXoS>. Accessed on: 24 June 2020.

78 <https://www.facebook.com/StariLiberal/>

79 <https://www.facebook.com/politizovanje/>

80 <https://www.facebook.com/desnarukaAmfilohija/>

81 <https://www.facebook.com/Dnevna-doza-crnogorskih-dubioza-456398734742710/>

82 <https://www.facebook.com/milolunja/>

83 RTCG, *A Plague of False News*, Digitalni Forenzički Centar (Digital Forensic Centre), 6 January 2020. Available at: <https://bit.ly/2VeBgrb>. Accessed on: 24 June 2020.

84 Kovačević, Milica, *Koprivica Dragan, Network of Disinformation and the Inadequate Response of the State*, CDT, 2020. Available at: <https://bit.ly/2VduRwF>. Accessed on: 24 June 2020.

3.5. Hatred and disinformation in established media comments

The experts we interviewed think there is no obvious hate speech in the editorial content of the established media in Montenegro.⁸⁵ One of the reasons why the established media do not get involved in releasing such content could be the strict regulations in this field.

On the other hand, according to some of our interviewees, the content released by the established media occasionally contain offensive, provocative and inflammatory speech, which is frequently based on personal insults.⁸⁶ AEM assistant director, Jadranka Vojvodić, said the following about this issue:

“All of the most popular online media release texts with provocative headlines, because they attract attention. However, the line between offensive speech and hate speech is rarely crossed. The kind of editorial content they release could make your hair stand on end, but, once you test the form, context, intention and cause in detail, you cannot say it was not political speech or a contribution to a debate. Also, this is not an issue for the regulator to address anymore; this should rather be a matter for self-regulation.”⁸⁷

However, there is no unique self-regulation in Montenegro and insufficient decisions by self-regulatory bodies, based on which we could evaluate the extent to which the established media adhere to professional standards. It is the opinion of all of those that we interviewed that the established media in Montenegro are not successful in consistently adhering to professional standards.

Although not frequently, it happens that they too come under the scrutiny of fact-checking platforms.⁸⁸ When compared to the right-leaning online media in Montenegro or the regional media, the number of “violations” by the established media is five to ten times lower. They commit these violations mostly when re-releasing disinformation from other sources without a previous fact-check.

Some of our interviewees agree that re-releasing disinformation occurs in these media as a consequence of the difficult economic situation, the need for more readership, and lack of human resources and fact-checking skills. They do not think it is deliberate systemic creation and distribution of disinformation, with a clear intent of manipulating readers.

85 The reply from the AEM, from 4 June 2020.

86 Vijesti online, Media center: The Agency for Electronic Media needs to stop hate speech, 21 January 2020. Available at: <https://bit.ly/3etR2pX>, Accessed on: 24 June 2020.

87 Interview with Jadranka Vojvodić, AEM assistant director.

88 The Raskrinkavanje.me platform analyzed the released content and found that established media engaged in media manipulation - CDM did so 19 times, portal Analitika 12 times, Vijesti online - eight times, Dan - eight times, the RTCG portal and TV station - eight times, Antena M - 7 times and Pobjeda - three times. Available at: <https://www.raskrinkavanje.me/mediji>. Accessed on: 23 May 2020.

What is recognized as the most problematic aspect of the work of the established media is the inadequate moderation of readers' comments in online media, which have become a platform for anonymous propagation of disinformation and conspiracy theories. Offensive speech frequently occurs in comments directed against ethnic, religious and sexual minorities, as well as insults against political or ideological opponents of the anonymous commentators.

Although it can be organized and coordinated by different interest groups, there is no clear evidence that commenting on these platforms is associated with specific centres of power or that it is supported and funded by a political party or some other interest group. Our interviewees indicated that the intensity of these comments increased during the pre-election period and in crises when society becomes polarized around certain important issues. Some of those we interviewed think that although the presence of a large number of comments could increase online media readership, one of the reasons why such content is insufficiently filtered is the lack of human resources in small editorial offices.

According to our interviewees, almost all online media face the problem of hate, disinformation and propaganda being spread in anonymous comments by readers.

According to our interviewees, almost all online media face the problem of hate, disinformation and propaganda being spread in anonymous comments by readers. We will show the examples of the two leading online media in Montenegro.

Their ownership structure is mostly associated with traditional, printed media, for which they represent an additional interactive space intended as a way of attracting the greatest possible number of readers.⁸⁹

Vijesti online, whose participation in daily visits by readers, compared to other online media, is 21%⁹⁰, operates as part of the Daily Press d.o.o., just like the newspaper of the same name. During the coronavirus epidemic, Vijesti online switched from post-moderation to pre-moderation.

Café del Montenegro (CdM), with a 6.5% participation in daily visits by readers⁹¹, was established by civil activist Boris Darmanović and later taken over by the Media Nea company, the publisher of newspapers Dnevne Novine and Pobjeda.⁹² As of 2013, the First Financial Holdings became the owner of the 99.9% of the Media Nea company. First Financial Holdings is owned by Greek businessman Petros Stathis. Stathis also owns the Adriatic Properties company and Universal Capital Bank. He is also renowned as the investor and manager of some of the world's most luxurious resorts of the global

89 Brkić, Daniela, *Poor implementation of regulations and continued control over the media, Montenegro Media Institute*, 2015. Available at: <https://bit.ly/3dvXRWH>. Accessed on: 24 June 2020.

90 Hodžić, S. and Petković, B. (2020). *Sustainability of Professional Journalism in the Media Business Environment of the Western Balkans. Report submitted for publication. Skopje: EU TACSO 3 Project.*

91 *Ibid*

92 Brkić, Daniela, *Poor implementation of regulations and continued control over the media, Montenegro Media Institute*, 2015. Available at: <https://bit.ly/3dvXRWH>. Accessed on: 24 June 2020.

Aman Resorts franchise, which include Aman Sveti Stefan and Aman Grand Canal Venice.⁹³

The founders of Vijesti (Miodrag Perović, Ljubiša Mitrović, Slavoljub Šćekić and Željko Ivanović) remained present in the ownership structure of the Daily Press publishing company. At the same time, the co-owners changed from the German media group Westdeutsche Allgemeine Zeitung (WAZ), which had 50% ownership in the company between 2003 and 2007, to American Media Development Investment Fund, which bought 25% of ownership in the company in 2008, and Austrian Styria Medien AG, which also became a 25% owner in the company, in 2009.⁹⁴ Several persons from the Daily Press and Vijesti ownership structure are also mentioned on the list of shareholders of Lovcen Banka⁹⁵. Outside of the media sector, one of the co-owners, Miro Perović, is the founder of the Water Group company, comprising the Suza and Bjelasica Rada bottled water brands.⁹⁶

The EU and Council of Europe's expert team has indicated that the interconnected media ownership structure represents a high risk in Montenegro.⁹⁷ Regardless of some media's financial reports being accessible in public registries, our interviewees indicated that there are no accurate data on their websites about leading advertisers, subsidies or sponsorships.

During the coronavirus epidemic, the government provided €310,000 of direct financial aid for the media, €300,000 with delayed disbursement or tax-free, €600,000 of loans with the Investment and Development Fund and subsidies for the salaries of media workers⁹⁸. The most visited web portals, CdM and Vijesti, are on the list of the media that have received government assistance. There is no accurate information on the amount they received. Portal Vijesti is an EU grant beneficiary.⁹⁹ In 2018, the Vijesti newspaper and the Vijesti.me web portal accrued €3.08m of income, with advertising accounting for €2.93m. CdM.me accrued €210,000 of income that year, with sales/advertising accounting for 100% of that sum.¹⁰⁰

The established media that have transparent and consistent ownership structures and operation and that use domestic and international public funding have the additional responsibility to not only resist disinformation and hate speech propagation practices in their media but also to lead self-regulation and other efforts in countering such practices and trends in the media community.

93 Portal Analitika, Stathis majority owner of the "Maestral" hotel, 07.07.2015. Available at: <https://bit.ly/3etUpwR>. Accessed on: 24 June 2020.

94 Ibid.

95 Lovcen Banka shareholders. Official website: <https://bit.ly/2Nm5rZk>. Accessed on: 24 June 2020.

96 Mirjačić, Marija, Suza bids for Bjelasica Rada, Vijesti online, 02.02.2019. Available at: <https://bit.ly/2B4DcMa>. Accessed on: 24 June 2020.

97 Ibid.

98 Government of Montenegro, Government provided financial help for the media during coronavirus pandemic, 14 June 2020. Available at: <https://bit.ly/2YuByfE>. Accessed on: 24 June 2020.

99 Hodžić, S. and Petković, B. (2020). Sustainability of Professional Journalism in the Media Business Environment of the Western Balkans. Report submitted for publication. Skopje: EU TACSO 3 Project.

100 Ibid.

4. CONCLUSIONS

Political, economic and social circumstances in Montenegro, as well as complicated and complex relations with certain countries in the region, reflect the media environment and communication practices in this country.

Along with outdated regulations, non-existing adequate self-regulation and an unregulated market, an increasing trend of offensive speech in the public space, which frequently escalates into hate speech, propagation of disinformation and propaganda, is visible in Montenegro.

This content is created and released via several channels:

- media operating in the countries of the region, with readership in Montenegro and which spread hate speech, disinformation and propaganda, with certain online media in Montenegro re-releasing their content, thus contributing to a widespread presence of unprofessional media releases;
- certain right-leaning online media, established/edited by individuals known as anti-NATO activists associated with opposition parties. Their sources of funding are not publicly accessible which makes it impossible to establish the connection between the content they release and sources of funding;
- pages on social networks that continuously spread offensive speech and hate speech against Montenegrin public figures, for which it is unknown what organizations/structures are behind them and who funds them.

Having in mind that regional media that publish disinformation, hate speech and propaganda, as well as right-leaning Montenegrin media, are among the most followed online media in Montenegro and that these types of media and communication practices intensify the releasing of unprofessional content in times of political and social crises, their influence on shaping public opinion is unquestionable.

On the other hand, there is almost no open spreading of hate speech in the established Montenegrin media. However, the comments sections of the online media, established to open up towards the broadest readership and achieve commercial success, are becoming a space for spreading hate speech, conspiracy theories and disinformation by anonymous readers.

Based on the quantity of information released daily by the Montenegrin media and based on the content released by the regional media with readership in Montenegro, it can be concluded that the deliberate creation and spreading of disinformation is not common practice for the established Montenegrin media. Such situations occur as occasional incidents and cannot be considered deliberate spreading of false narratives.

However, the findings and analyses used in this study and interviews with relevant media figures conducted by the team of authors for this study indicate that adherence to professional standards in the established media is in decline. This becomes especially apparent in times of political and social crisis. An additional complication is that the attainment of high professional standards is not on the list of priorities for advertisers when choosing which media in which to advertise.

Failure to apply in practice the principle of full managing and financial transparency is a visible shortcoming in the functioning of the Montenegrin media.

There is an obligation to publish information about the ownership structure for the electronic media, while in certain online media, there is no information on their owners or impressum. Although financial reports of the established media are publicly accessible, some media organizations fail to publish accurate information on their main sources of funding and key advertisers in commercial media, which makes it impossible to accurately establish the connection between the released media content and sources of funding.

5. POLICY RECOMMENDATIONS

In order to improve the current situation in the functioning of the media, based on the analyses, the Montenegro Media Institute put together a list of recommendations for decision makers, the media community and the civil sector:

- **Institutions in charge of enforcing the law** (primarily the AEM and the Ministry of Culture) should take the necessary action to enable the most efficient implementation of laws possible and resolve any potential ambiguities (monitoring of online media, registration of online media, response in cases of failure to register, etc.);
- **Prosecutorial institutions in charge** should respond to cases of hate speech that continuously occur on social networks and certain Facebook pages,
- **Competent institutions** should take measures against the spreading of disinformation and find appropriate solutions instead of the unacceptable arrest of those suspected of spreading disinformation and their passive approach to the problem of disinformation;
- The divided **media community** should make long-term efforts in establishing a common self-regulatory body, which would indicate examples of hate speech, disinformation and propaganda and promote professional standards;
- **Media organizations** should improve transparency and use their websites to publish detailed information on ownership structure, editorial/journalistic structure and sources of funding;
- **Online media** should apply concrete measures to improve comment moderation systems on their websites and on social networks, thus limiting the spread of hate speech, disinformation and propaganda in comments sections;
- **Trade associations and professional media organizations** should help reinforce media capacities for comment moderation, propaganda detection and fact-checking through project activities;
- **The part of the civil sector promoting media literacy** should launch educational campaigns and engage in activities to raise public awareness about the importance of professional media reporting and use of professional and ethical media as a source of information;
- **Fact-checking platforms** should continue contributing to the fight against disinformation and propaganda and additionally reinforce their resources, so as to be able to engage in more intense monitoring and analysis of media content in Montenegro.

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LIST OF INTERVIEWS:

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Dražen Živković, editor in chief of the Borba.me web portal, via the Viber mobile application, Podgorica, 30 June 2020.

Gojko Raičević, editor in chief of the in4s.net web portal, via the Viber mobile application, Podgorica, 30 June 2020.

Goran Đurović, Media Centre director, Podgorica, 12 June 2020.

Jadranka Vojvodić, Agency for Electronic Media assistant director, Podgorica, 10 June 2020.

Milica Babić, editor of the RTCG Morning Show, Podgorica, 5 June 2020.

Milka Tadić-Mijović, president of the Centre for Investigative Journalism, Podgorica, 3 June 2020.

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This publication is a part of the RESILIENCE project research component. The first series of research reports examines THE POLITICAL ECONOMY OF HATE AND PROPAGANDA MEDIA MODEL in Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Serbia and Turkey.

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