PROPAGANDA, DISINFORMATION AND HATE MODELS OF MEDIA AND COMMUNICATION IN BOSNIA AND HERZEGOVINA

Anida Sokol

BOSNIA AND HERZEGOVINA

RESILIENCE : For Media Free of Hate and Disinformation

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CONTENTS

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1. INTRODUCTION

Twenty-five years after the end of the war (1992−1995), the political climate in Bosnia and Herzegovina (BiH) is still permeated with divisive ethno-nationalistic rhetoric and constant disagreements between ethno-national political elites that halt democratic processes and BiH's path to a fully democratic and functioning society. The media and public communication practices are both determined by and contributing to these tendencies. The media in BiH are pliable to the influences of political and business groups, lacking sufficient revenues and capacities for independent and professional journalism and protection mechanisms against political parties' interference into editorial policies. Many media outlets are affiliated with the leading political parties and business circles through non-transparent and arbitrary financing and ownership patterns, while independent media outlets are scarce and usually funded by foreign donors (Hodžić and Sokol, 2018a; 2018b). Even though the regulatory system, which was set up by the international community, has managed to pacify the warmongering and inflammatory content through selective covering of current and historical events, and lack of criticism towards inflammatory and divisive ethno-national politics, the media continue to perpetuate ethno-national divisions and contribute to selective memories of the past. In addition to local political actors, foreign actors have also been trying to assert their geopolitical interests in the Western Balkans through the media (StratCom Nato, 2020).

New technologies and the growing use of the Internet have posed new challenges. Divisive and inflammatory rhetoric has moved online and social media and comments sections of online media are permeated with derogatory language and hate speech, mostly exchanged between ethno-national groups, Bosniaks, Serbs and Croats, but also targeting migrants, women, LGBTI+ and Roma communities (Cvijetićanin et al, 2010; Hodžić, 2014). Death threats, discriminatory language and insults targeting individuals and journalists are also present in the online media and in user-generated content, the targets of which have been particularly female journalists (Sokol, 2018).

In recent years, numerous anonymous portals have been set up that spread disinformation and propaganda (Cvijetićanin et al, 2019), but research

shows that citizens struggle to identify problematic media content and there have not been any systematic efforts by governments in BiH to introduce media and information literacy in primary and secondary education (Hodžić, Petković and Bašić Hrvatin, 2019; Sokol, 2019b; Trninić, 2014).

This research analyzes propaganda, disinformation and hate models of media and communication in the country. Its aim is to give an overview of the structural elements in the production, distribution and use of these models and their influence on and support to the existing ethno-national tensions and divisions. The research was conducted based on secondary research, consultations with representatives of the regulator and civil society organizations,[1] analysis of the decisions of the Communications Regulatory Agency (CRA), the Press Council of BiH, the fact-checking platform Raskrinkavanje, and watchdog media platforms Analiziraj.ba and Media.ba. In order to obtain information on financing and ownership patterns, where available, budgets of the media or local municipalities were reviewed, while more information was obtained through social media accounts of media organizations, the who.is tool and the business registry pravosudje. ba. In addition, a number of articles of the selected online media were reviewed in June 2020 to gain a better understanding of the media's editorial policies.

> Research shows that citizens struggle to identify problematic media content and there have not been any systematic efforts by governments in BiH to introduce media and information literacy in primary and secondary education.

Based on secondary research, a number of media and communication models in which disinformation, propaganda and hate speech are mainly produced and disseminated were identified. They pertain to one of the three types of media and communication: traditional media; new media; and user generated interaction on online media and social networks. They include: 1) traditional media that are affiliated with the centres of power and disseminate political and ethno-national propaganda; 2) anonymous portals and commercial online media that spread disinformation for political or financial purposes; 3) political propaganda websites that mushroom prior to election campaigns; 4) websites and social media groups that spread radical and aggressive ethno-national and religious content; 5) portals that with their narratives target minority groups, such as migrants; 6) hate speech, derogatory language and insults in comments sections on online media and social media platforms.

In the research, we will first briefly explain the disinformation, propaganda and hate models of media and communication and then provide seven examples to gain a better understanding of their organizational modalities, content, financing and ownership patterns. We will look into the (self)regulation frameworks and efforts of different actors to regulate them and conclude with recommendations for steps that need to be taken by institutions, organizations and the media to minimize the spread of disinformation, propaganda and hate speech and create space for media and communication practices that will stir healthy debate and democratic processes.

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1   *Representatives from the following organizations were consulted: Communications Regulatory Agency; The Press Council; the fact-checking platform Raskrinkavanje; The Sarajevo Open Center; The Network for Building Peace; the digital media archive INFOBIRO and the Institution of Human Rights Ombudsman BiH.*

2. TYPES AND MODUS OPERANDI OF PROPAGANDA, DISINFORMATION AND HATE MODELS

2.1. Traditional Media

The BiH media sector is characterized by a large number of media outlets: 103 television stations, 152 radio stations, three public service broadcasters, eight dailies and 181 periodicals.[2] Many local public broadcasters, which are owned and mainly financed by local governments, lack capacities to critically report on local power-holders and many promote the interests of the ruling parties (Hodžić and Sokol, 2018a; 2018c). Among private broadcasters and the print media, some media, through ownership patterns and allocation of public grants and advertisement revenues (often non-transparent and arbitrary), are affiliated with and promote the interests of political parties and business groups (Hodžić and Sokol, 2018a; 2018b; Krajnc and Kadić-Maglajlić, 2018).

Due to the lack of capacities and revenues, the quality and diversity of information is poor, they publish unverified information, use one-sided official sources and do not provide critical stances towards problematic statements of politicians. Some traditional media are also sources and distributors of disinformation: for example, the fact-checking platform Raskrinkavanje has ranked Avaz, RTRS, Slobodna Bosna and Alternativna televizija as high-risk media for spreading fake news and disinformation.[3]

Many local public broadcasters, which are owned and mainly financed by local governments, lack capacities to critically report on local power-holders and many promote the interests of the ruling parties.

Many media are divided along ethno-national lines, which is visible in their emphasis on the issues and the agenda of the respective ethno-national group and one-sided interpretations of war events (Aktek, 2018; Irex, 2019; Sokol, 2019a), while content intended for or dealing with minorities and vulnerable groups is largely underrepresented (RAK, 2019b). Poor diversity of information and content is also a consequence of gender stratification and lack of workplace diversity in media outlets. A number of research studies indicate, for example, that women tend to be employed as journalists and members of the administrative staff rather than editors-in-chief and directors (Unkić, 2018; Džihana, 2018). In 2020, only twenty-six per cent of directors of television stations and thirty per cent of directors of radio stations are female and mostly of local public broadcasters.[4]

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2   *Obtained from the registries of the CRA and the Press Council.*

3   *See the lists of red-flag and high-risk media on: https://raskrinkavanje.ba/high-risk-mediji*
Also: https://raskrinkavanje.ba/mediji

4   *The percentage of female directors in local public broadcasters is rather high. 63 percent of radio directors and even 78 percent of television directors are women. The percentage has been calculated based on the information from the lists of broadcasters of CRA.*

2.2.   Online Platforms

In recent years, there has been a rise in the number of online platforms that disseminate false or misleading media content, much of which is of political nature and spread for financial gain and/or political purposes. Many of these websites are anonymous, lack impressums and are not registered as businesses, and some form the so-called portal farms that use numerous Facebook pages and related domains to promote their content and generate more revenues (Cvijetićanin et al, 2019).[5]

A number of online media, mainly anonymous, mushroom in pre-election periods and publish favourable news about political parties (mostly the three ruling ethno-national parties the SDA, HDZ and SNSD), lack commercial ads and usually are no longer active after the elections (Blagovčanin, 2019; Turčilo, 2020). Niche anonymous websites, social media groups and internet-based communities that disseminate aggressive radical ethno-national and/or religious content, justify war crimes and glorify war criminals are also present in the BiH online sphere[6] (Sokol, 2019a; Aktek, 2018). Their ownership, the names of authors and financing patterns are not known (many presumably work on a voluntary basis and are established as grassroots initiatives), but the example of Despotovina.info, a radical Serb website, which has been supported by the municipalities of Srebrenica and Bratunac, and, according to its webpage, the government of Serbia, demonstrate that the existence of such platforms could be linked to political parties (Sokol, 2019a).

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Even though most of these platforms target one of the three ethno-national groups and/or certain political parties, in recent years migrants and refugees have become frequent targets of some media platforms, particularly news portals in the Krajina region and Facebook groups (Buljubašić, 2019; Adilagić, 2019; Sokol, 2019c). Some platforms stereotype and stigmatize women, including those of the radical religious spectrum (such as the website of Zijad Ljakić), and those of anti-religious orientation (such as Bosanski nacionalisti) (Aktek, 2018).

2.3.   User Generated Content

Hate speech rarely occurs in the editorial content of media outlets and even radical right-wing and religious websites (Aktek, 2018), but the comments sections of online media and social media platforms are flooded with large volumes of hate speech, derogatory language and insults, usually related to ethno-nationalism (Aktek, 2018). In 2019, the Sarajevo Open Center documented 104 instances of hate speech online, of which 100 pertained

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5   For example, the semi-anonymous portal Novi.ba is connected to 58 Facebook pages and several domains to promote its content (Cvijetićanin et al, 2019).

6   For example, Despotovina.info or Bosanskinacionalisti.org.

to comments on Klix.ba,[7] many targeting the LGBTI+ community, particularly in relation to the first Pride March, organized in Sarajevo. Most complaints about hate speech in user-generated content that the Press Council received in 2019 were in relation to the comments sections of some of the most popular internet portals Depo.ba, Klix.ba, and Dnevno.ba (Vijeće za štampu, 2019). Political trolls have also been identified in user sections: one analysis of the comments sections of Klix.ba in the pre-election period in 2018 identified 259 profiles that had the characteristics of political trolls and published comments in favour of the SDA, SBB and SDP political parties (Raskrinkavanje, 2019).

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7   *Monitoring of the Sarajevo Open Center. Written correspondence. 25.6.2020.*

8

3. EXAMPLES OF PROPAGANDA, DISINFORMATION AND HATE MODELS IN BIH

With the aim to gain a deeper understanding of the structural elements of these models, their financial and ownership patterns, and their relations and influence on the public and democratic processes in BiH, examples will be elaborated in the following sections. Examples were selected based on secondary sources, consultations with media and human rights organizations, reviews of decisions of the CRA and the Press Council from 2018 and 2019, and analysis of the fact-checking platform Raskrinkavanje (from 2017 until June 2020), Analiziraj.ba and Media.ba. In cases, where breaches of professional norms or instances of disinformation were not registered by self(regulatory) bodies and the fact-checking platform, examples were chosen based on consultations with the abovementioned organizations, secondary sources, estimates made by the researcher and a brief overview of the content of the media in June 2020. Popularity of the media was also taken into consideration: higher number of followers on social networks in June 2020 or media that stirred discussions in the public, such as Antimigrant.ba or RTV Herceg Bosne. The list is in alphabetical order and includes public/private media, local/regional media, TV, radio, online and print as well as media affiliated and supporting different ethno-national political and/or religious agendas. The list is only illustrative and many other examples of propaganda, disinformation and hate models exist in the country.

3.1. Antimigrant

Antimigrant is a radical website which has been publishing hate speech and disinformation about migrants and refugees in BiH and even calling for direct attacks against them. The portal has the official domain of BiH (.ba), which is registered to Fatmir Alispahić, a Bosniak author. Its modus operandi is copy-pasting articles from other media about migrants and refugees and changing their titles into those that are provocative, discriminatory and call for direct attacks against migrants and those who help them. In addition to hate speech against migrants, Atimigrant.ba has been publishing disinformation about individuals, institutions and organizations that operate in BiH and help refugees and migrants (Sokol, 2019c).

The Network for Building Peace filed complaints with the Press Council, the Ministry for Human Rights and Refugees and the Institutions of Human Rights Ombudsmen of BiH, which, however, have not produced any results (Sokol, 2019c). The webpage has no ads and the manner of its funding is not known. In 2019, the Press Council identified five gross breaches of the Press and Online Media Code (Vijeće za štampu, 2019), and, the fact-checking platform identified it as a high-risk medium for spreading unreliable content.

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9

MEDIA OUTLET AND TYPE: ANTIMIGRANT, ONLINE *Table 1*	
OWNERSHIP DATA	The domain is registered on Fatmir Alispahić, who is the author of most of the articles.
FUNDING	N/A
MISSION AND EDITORIAL POLICY	Publishing articles against migrants and refugees; calling for direct attacks against them.
NUMBER OF EMPLOYEES	N/A
REACH	N/A
BREACHES OF PROFESSIONAL CODES	5 breaches of the Press and Online Media Code of BiH in 2019.
FACT-CHECKING PLATFORM	51 Examples of problematic media content; including biased reporting (24) and manipulation of facts (11).

3.2. Despotovina.info

Despotovina.info is a radical Serb news portal from Bratunac, which propagates the Serb ethno-national narrative and glorifies members of the Army of Republika Srpska, including Ratko Mladić, who was convicted for war crimes against humanity and genocide by the International Criminal Tribunal for the Former Yugoslavia (ICTY) (Sokol, 2019a). It also publishes news related to the municipalities of Bratunac and Srebrenica, information about humanitarian events and reports on the local government and the SNSD party. According to its webpage, it was founded in 2016 with the support of the Ministry of Culture and Information and the Ministry of Foreign Affairs of Serbia and receives support from the Municipality of Bratunac. The portal belongs to the Association Despotovina and one of its founders is a local priest (Kuloglija, 2020). In 2019, the portal received a grant from the Municipality of Srebrenica,[8] which sparked criticism from other non-governmental organizations in Srebrenica (Kuloglija, 2020). It has been identified as a problematic media outlet stirring ethno-national tensions among the local population in Srebrenica and Bratunac, an area with a heavy war heritage and difficult reconciliation process (Sokol, 2019a). For example, in January 2019 it published a photo of the Orthodox Christmas celebration with words almost identical to those uttered by Ratko Mladić, when he entered in Srebrenica in

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8   See the decision: http://srebrenica.gov.ba/images/dokumenti/2019/JP_UG_NVO_SPORT/Odluka_-_sportski_klubovi_i_NVO_za_2019.pdf

July 1995: "Here we are in Srebrenica on the eve of yet another great Serbian holiday". It has not been the subject of analysis of the fact-checking platform and the Press Council of BiH.

MEDIA OUTLET AND TYPE: DESPOTOVINA.INFO, ONLINE *Table 2*	
OWNERSHIP DATA	Association Despotovina. One of the founders is a local priest Aleksandar Mlađenović; editors Aleksandar Ćirković and Aleksandar Lesendić Petrović[9].
FUNDING	According to its webpage, it is supported by the Government of Serbia and the municipality of Bratunac. In 2019, it received a grant of 750 euros from the Municipality of Srebrenica.
MISSION AND EDITORIAL POLICY	Propagation of the Serb ethno-national narrative and glorification of the members of the Army of Republika Srpska.
NUMBER OF EMPLOYEES	The editors-in- chief Aleksandar Lesendić Petrović and Aleksandar Ćirković.
REACH	22,721 followers on Facebook.
BREACHES OF PROFESSIONAL CODES	N/A
FACT-CHECKING PLATFORM	N/A

3.3. Dnevni avaz

Political affiliations in the print media are the most straightforward in the case of the daily newspaper Dnevni avaz, held by the Radončić family, and connected to the government coalition party SBB. The newspaper was founded in 1993 by the then-journalist Fahrudin Radončić, who after the war built a real estate empire, formed the SBB party in 2009 and served as the Minister of Security of BiH. He was the owner of the newspaper until 2012 when he sold the company Avaz Roto Press[10] to his former wife (100 million euros) (CIN, 2017; Hodžić, 2014b). The bill of sale and the accompanying annexes enabled Radončić to formally pull himself out of the Avaz-Roto Press while continuing to exert influence on the editorial policy of the newspaper (CIN, 2017).

Political affiliations in the print media are the most straightforward in the case of the daily newspaper Dnevni avaz, held by the Radončić family, and connected to the government coalition party SBB.

Dnevni avaz has been reporting favourably on the SBB party, targeting the party's opponents and its reporting frequently involves non-professional, biased and sensationalist content, with catchy

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9   Information about editors is published on their Facebook page.
10   The company Avaz Roto Press also publishes the women's magazine Azra and a tabloid paper Express.

titles and clickbaits.[11] The media outlet is also known for its campaign against migrants, portraying them in a negative and dehumanizing light (Zulejhić, 2020).

In 2019, the Complaints Commission of the Press Council identified 17 breaches of the Print and Online Media Code (Vijeće za štampu, 2019),[12] including seven breaches of the principle of accuracy and fair reporting, while the fact-checking platform Raskrinkavanje listed Dnevni avaz as a red flag and high-risk media for the spread of fake news and content of questionable accuracy. As a retaliation, the outlet published seven articles against the fact-checking platform, naming its members as foreign mercenaries (Zulejhić, 2019).

The media outlet manages to have a wide readership through its online version and the use of sensationalist and clickbait titles, reports on accidents, domestic violence and deaths (crna hronika) and showbusiness, which are highly read (Buljubašić, 2020). According to Alexa.com, in June 2020 Dnevni avaz was the most read news portal in BiH, followed by more than half a million people on Facebook. Its circulation is not known, but the media outlet labels itself as the most circulated and influential print and online media in BiH.

MEDIA OUTLET AND TYPE: DNEVNI AVAZ, PRINT AND ONLINE	
Table 3	
OWNERSHIP DATA	Private media. Owner: Company Avaz Roto Press, owner Azra Radončić.
FUNDING	Advertisement
EDITORIAL POLICY	Affiliations with the SBB party through ownership patterns that influence the editorial policy.
NUMBER OF EMPLOYEES	Editorial staff: 8 (6 male, 2 female)[13]
REACH	The most read news portal according to Alexa; Facebook followers: 617,110
BREACHES OF PROFESSIONAL CODES	In 2019, 17 breaches of the Print and Online Media Code.
FACT-CHECKING PLATFORM	185 examples of problematic media content, including clickbait titles (37), disinformation (29), biased reporting (26) and fake news (23).

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11   See for example: Buljubašić (2020).

12   The outlet published five corrections and denials.

13   According to its impressum.

3.4. RTRS

One of the most known examples of a politically affiliated traditional media is the public service broadcaster of Republika Srpska, RTRS. Even though public service broadcasters, to retain their independence, should be funded through licence fees, in 2013 the government of Republika Srpska adopted amendments to the Law of RTRS according to which the government can finance the public service broadcaster. In recent years, RTRS has been receiving around one and a half million euros annually, under the pretext of its very bad financial situation (RTRS, 2018).[14] Its managerial staff has been affiliated with the SNSD party: for example, RTRS's director Milan Trbojević was head of the Press Office of the President of Republika Srpska.[15]

The CRA, international organizations[16] and media watchdog platforms have identified bias in RTRS's reporting on multiple occasions. In 2019 and 2018, the public service broadcaster was fined by the CRA six times for violating the principle of fairness and impartiality (RAK, 2020; RAK, 2019a).[17] In 2018, the CRA conducted a one-month monitoring analysis of the three public service broadcasters' (BHRT, FTV and RTRS) news content and concluded that RTRS continuously and tendentiously promoted the interests of the ruling SNSD party, constantly presenting the party's members in a positive and affirmative way and mostly reporting critically on the activities of the opposition (RAK, 2019a).

For example, in 2019, RTRS published unverified and sensationalist news that foreign actors and local NGOs, critical towards the governments, attempted to overthrow the government of RS (RAK, 2020). Similarly, through selective reporting, RTRS presented the protest Pravda za Davida[18] as an event that will endanger the survival of RS and the protesters as aggressive and dangerous. In both cases, the CRA concluded that the broadcaster abused and manipulated the emotions and fears of the public (RAK, 2020).

> In 2018, the CRA conducted a one-month monitoring analysis of the three public service broadcasters' (BHRT, FTV and RTRS) news content and concluded that RTRS continuously and tendentiously promoted the interests of the ruling SNSD party, constantly presenting the party's members in a positive and affirmative way and mostly reporting critically on the activities of the opposition.

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14   In 2018, the broadcaster received 1,750,000 euros and in 2017 around 1,2500,000 euros from the government of RS (RTRS, 2018). In 2019, the total amount of the RS government's subsidies for the public media was almost 2,500,000 euros. Besides RTRS, the government funds the entity's news agency Srna (RS, 2019).

15   The former director Draško Milinović is also affiliated with the SNSD party. He was chief of staff of the Prime Minister of RS, and in 2020 was elected as the director of the CRA (I.Č, 2020). Appointments of party loyalists to managerial staff take place in other broadcasters.

16   For example, the media monitoring of the OSCE during the election period 2018 confirmed that RTRS extensively followed Milorad Dodik as the president of the RS and as a presidential candidate, breaching the principle of equal treatment of all candidates (OSCE, 2019).

17   In 2018, the public service broadcaster of Federation FTV was fined for violating the principle of fairness and impartiality (2018, written warning) and in 2019 for the failure to properly tag content for minors (fine 1,000 euros) (RAK, 2020; RAK, 2019).

18   Mass protests that have been organized in Banja Luka since March 2018 over the death of a 21-year-old boy David Dragičević. The prosecutor's office has classified the death as an accident but the boy's parents claim he was brutally murdered.

One-sided interpretations of war events and neglect of court proceedings over the crimes committed by the Army of Republika Srpska have been part of the SNSD narrative and RTRS. For example, in 2019, RTRS published the conclusions of a report of the Centre for War Research, War Crimes and the Search for Missing Civilians of the Republika Srpska about the 25 May 1995 Tuzla massacre, according to which the deaths of 71 people were caused by local simultaneous terroristic explosions by the Bosniaks rather than artillery projectiles fired by the Army of Republika Srpska, an officer of which was convicted by the Court of BiH in 2014 for the act. The CRA concluded that the broadcaster had failed to present different views on the subject and even violated victims' dignity by stating that 27 victims could be identified as suicide bombers and revealed the names of two (RAK, 2020).

The fact-checking Raskrinkavanje labelled RTRS as a high-risk medium for publishing content of questionable accuracy. Their 2019 research identified RTRS, together with the RS public news agency Srna News, as the single most prolific sources of political disinformation in BiH (Cvijetićanin et al, 2019). The two media frequently use anonymous websites as both sources and amplifiers of the disinformation they publish (Cvijetićanin et al, 2019). The same research placed RTRS in the centre of the so-called disinformation hubs, a network of online media in BiH (Infosrpska.com, Srna, Alternativna televizija) and Serbia (Blic, Informer, Kurir), among which is also the Russian-owned medium Sputnik, that publish the same disinformation. The research concluded that this network is of political nature and is used by local and foreign actors to influence public opinion in BiH (Cvijetićanin et al, 2019).

MEDIA OUTLET AND TYPE: RADIO-TELEVISION OF REPUBLIKA SRPSKA (RTRS); PUBLIC SERVICE BROADCASTER; TV, RADIO AND ONLINE	
Table 4	
OWNERSHIP DATA	Public, founder is the Government of RS
FUNDING	Licence fees, advertising and government of RS (the latter around one and a half million euros).
EDITORIAL POLICY	Affiliated with the leading political party in RS, SNSD.
NUMBER OF EMPLOYEES	629 (male 367; female 262) (RTRS, 2018).
REACH	73,200 followers on Facebook
BREACHES OF PROFESSIONAL CODES	In 2018 and 2019, fined six times by the CRA for breaching the principle of fairness and impartiality.
FACT-CHECKING PLATFORM	216 examples of problematic media content, including biased reporting (56 articles), conspiracy theories (28), fake news republished from other sources (27), disinformation (24) and spin (24).

14

3.5.   RTV Herceg Bosne

Calls for the establishment of a public service broadcaster in the Croatian language have been dominating the public discourse of the Croat HDZ party. In 2019, the public media outlet RTV Herceg-Bosne, which has had a radio station since 1993, purchased TV Kiss and started broadcasting its television channel in the Croatian language. It is named after the Croatian Community of Herceg-Bosna, a proto-state during the war in BiH and whose political and military leaders were convicted by the International Criminal Tribunal for the Former Yugoslavia.[19] It is funded by 13 municipalities and two cantons in the Federation of BiH where the HDZ party forms the government in the overall amount of 400,000 euros (Blagovčanin 2018; Grbešić 2019; Transparency International, 2019).[20] For its renovation and equipment the Republic of Croatia allocated around 60,000 euros in 2019, within its programme of support for cultural, educational and other projects of Croats in BiH.[21] On a number of occasions in the past, RTV Herceg-Bosna has received revenues from the budget reserve of BiH, approved by the Croat member of the Presidency (Transparency International, 2019). [22]

Due to its strong political affiliations with the HDZ party, there is a high risk of editorial bias, although none of the media monitoring platforms have analyzed its content. Based on the review of its content in June by the researcher and secondary sources, the media outlet propagates the interests of the HDZ, publishes favourable news on its members and its president Dragan Čović, and commemorates HVO war victories, victims and generals. Its manner of funding has sparked debates and even protests in towns with mixed Croat-Bosniak population, such as Žepče, where, in 2019, citizens gathered in protest against the municipality's decision to fund the media outlet (Grbešić, 2019).

> It is named after the Croatian Community of Herceg-Bosna, a proto-state during the war in BiH and whose political and military leaders were convicted by the International Criminal Tribunal for the Former Yugoslavia. It is funded by 13 municipalities and two cantons in the Federation of BiH where the HDZ party forms the government in the overall amount of 400,000 euros.

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19   See for example: https://www.documenta.hr/en/111-years-in-prison-for-herceg-bosna-leaders-sense-tribunal-news-report.html

20   The municipalities are: Grude, Kreševo, Kiseljak, Livno, Ljubuški, Neum, Posušje, Ravno, Stolac, Široki Brijeg, Tomislavgrad, Žepče, Čapljina, Hercegovačko-neretvanski kanton i Zapadnohercegovački kanton.

21   See the decision: https://narodne-novine.nn.hr/clanci/sluzbeni/2019_08_74_1575.html

22   In 2018, it received 25,000 euros.

MEDIA OUTLET AND TYPE: RADIOTELEVIZIJA HERCEG-BOSNE, RADIO, TV, ONLINE, PUBLIC *Table 5*	
OWNERSHIP DATA	Public, Croat municipalities and cantons where the HDZ is part of the government
FUNDING	Through public budgets, funded by 13 municipalities and 2 cantons. In 2019, the annual subsidies amounted to 400,000 euros. It also received support from the Republic of Croatia.
MISSION AND EDITORIAL POLICY	Follows the political agenda of the HDZ political party.
NUMBER OF EMPLOYEES	N/A
REACH	6,594 followers on Facebook
BREACHES OF PROFESSIONAL CODES	N/A
FACT-CHECKING PLATFORM	N/A

3.6. SAFF

Saff is a Muslim religious magazine of the Association Saff for the Affirmation of Education, Culture and Morality and founded in 1996. It has a long tradition and large readership (almost 50,000 followers on Facebook) and is mostly followed by the Muslim religious community. It is known for its articles against the LGBTI+ community and has been supporting the Bosniak ethno-national narrative and is mostly favourable about the SDA party and the Turkish president Erdogan. In 2019, the magazine led a campaign against the journalist Kristina Ljevak, who was appointed director of the public media outlet of the Canton Sarajevo TVSA, labelling her as a journalist whose main role is to promote homosexuality and accusing her of broadcasting a film that propagates Great Serbia ideology, the unity of all territories where Serbs live.[23] The magazine also created spin and disinformation that the media in BiH had waged a campaign against the SDA MP in the Assembly of Canton Sarajevo Samra Ćosović Hajdarević, who openly condemned the Pride March and stated that the LGBTI+ community should be isolated and moved as far as possible.[24] The fact-checking platform identified 41 problematic articles and the Press Council in 2019 four breaches of the Press and Online Media Code (Vijeće za štampu, 2019).

In 2019, the magazine led a campaign against the journalist Kristina Ljevak, who was appointed director of the public media outlet of the Canton Sarajevo TVSA, labelling her as a journalist whose main role is to promote homosexuality.

23   See, for example, the article: http://saff.ba/nova-direktorica-tvsa-bit-ce-imenovana-kristina-ljevak-homoseksualna-aktivistica-i-bivsa-novinarka-ftv-a/
24   See: http://saff.ba/sarajevski-novinari-se-utrkuju-ko-ce-se-vise-svidjeti-homoseksualcima/

MEDIA OUTLET AND TYPE: SAFF, PRINT AND ONLINE	
Table 6	
OWNERSHIP DATA	Association Saff for the Affirmation of Education, Culture and Morality
FUNDING	N/A
MISSION AND EDITORIAL POLICY	Religious magazine, supporting the Bosniak ethno-national narrative.
NUMBER OF EMPLOYEES	N/A
REACH	49,547 followers on Facebook
BREACHES OF PROFESSIONAL CODES	4 breaches of the Press and Online Media Code in 2019.
FACT-CHECKING PLATFORM	41 problematic articles, including 7 biased reporting, 6 disinformation and 5 conspiracy theories.

3.7. STAV

Besides the influence of local political actors, there are indications that foreign actors have also been trying, through the media, to assert their interests in the Western Balkans (StratCom, 2020). One example is Stav, a magazine published by the Turkish company Simurg Media, which was founded in 2015 with anonymous capital from Turkey (29,000 euros), despite the fall in readership of the print media and advertising revenues.[25] Even though the number of breaches and examples of problematic content identified by the Press Council and the fact-checking platform in 2019 is low (overall seven, see the table), the researcher's review of the magazine's content in June point to strong editorial bias. The magazine has been publishing articles and columns mostly on politics, culture and history, following the Bosniak ethno-national narrative and the political agenda of the SDA party and reporting favourably on its members, and the Turkish President Erdogan (Janusz, 2015). Any kind of criticism against the party has been portrayed as attacks against the Bosniaks and the state. For example, the arrest of the Prime Minister of the Federation and a member of the SDA party, Fadil Novalić, during the coronavirus pandemic in May 2020 in relation to the Srebrena malina corruption affair, has been termed as a coup d'etat and an attack against the Bosniaks (in a similar style as RTRS). In the case, "Fh Srebrena malina" , a fruit and vegetable grower and processor, was granted a permit to procure 100 ventilators from China for a much higher price (around

STAV has been following the Bosniak ethno-national narrative and the political agenda of the SDA party and reporting favourably on its members, and the Turkish President Erdogan.

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25   *Simurg Media also publishes Faktor.ba and Faktor sport, which follow a similar agenda. Faktor.ba has been ranked among red flag media for publishing disinformation.*

5 million euros) than those that can be found on the international market.[26] Moreover, the model of ventilators is used in medical transport rather than hospitals.

The magazine has been following the Bosniak ethno-national narrative and writing positively about the Muslim intellectual Mustafa Busuladžić, who collaborated with the fascist regime during the Second World War and was killed by the communists, especially after an initiative in the Assembly of the Canton Sarajevo in June 2020 to the rename the primary school that is named after him. [27]

The manner of the magazine's funding is not known: the magazine and the online portal had only a couple of ads in June 2020, which is not sufficient to sustain a rather large editorial staff. From 2016 until 2018, Simurg Media received support from the budget reserve of BiH approved by the Bosniak member of the Presidency of BiH and the Council of Ministers for its literary award and publishing activities in the amount of 19,000 euros, which points to its connections with the SDA party (Transparency International, 2019).

MEDIA OUTLET AND TYPE: STAV MAGAZINE, PRINT AND ONLINE	
Table 7	
OWNERSHIP DATA	Publisher: Simurg Media d.o.o. Sarajevo, founded with anonymous capital from Turkey (29.000 euros), the director of Simurg Media is Evren Utku Gok
FUNDING	N/A. Presumably mainly through advertising. The company received support from the Presidency of BiH and the Council of Ministers from 2016 until 2018 for its literary award and publishing activities in the amount of 19,000 euros from the budget reserve of BiH, which was criticized by the professional media community. [28]
MISSION AND EDITORIAL POLICY	A weekly magazine on politics, society and culture. Ownership, financing and content point to its affiliation with the SDA party.
NUMBER OF EMPLOYEES	Editorial staff: 10: 8 male, 2 female, 29 part-time authors [29]
REACH	20,197 followers on Facebook
BREACHES OF PROFESSIONAL CODES	In 2019, 3 breaches of the Print and Online Media Code (Vijeće, 2019).
FACT-CHECKING PLATFORM	4 examples of problematic media content: fake news (2), spin (1) and biased reporting (1)

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26   *The article is available here:* https://stav.ba/pokusaj-drzavnog-udara-novalic-prebacen-u-tuziteljstvo-bih/

27   *See the article:* https://stav.ba/kako-je-i-zasto-osuden-mustafa-busuladzic/

28   *See:* https://www.cin.ba/budzetska_rezerva_2/prikaz.php?korisnik=8291

29   *According to their impressum.*

4.   DISCUSSION AND CONCLUSION

In Bosnia and Herzegovina, there are numerous examples of media and communication that spread disinformation, propaganda and hate speech. These are usually sustained through different ownership and financing patterns, often hidden, including local and foreign centres of power, and are used, through selective reporting, for the promotion of ethno-national or religious narratives or political agendas, targeting other ethno-national, political or minority groups. These models act as echo chambers, where audiences encounter views of their ethno-national, religious or political group and disregard other facts and can further prevent reconciliation processes, state building and development of national cohesion. The existence of such media, as has been shown by Despotovina.info, can particularly increase tensions among the local population, with heavy war heritage, but could also raise hatred towards other groups, such as migrants and refugees. Ethno-national tensions and divisive ethno-national politics are circumstances that render the existence of such models that make hate speech based on ethno-national affiliation even more serious and increase the probability of violence.

Bosnia and Herzegovina has regulatory and self-regulatory frameworks for the print, online and broadcast media and a legal mechanism for the prosecution of hate speech, death threats and discrimination, but their implementation has been limited. The Communications Regulatory Agency can react and issue fines against fake and manipulative content, biased reporting, discriminatory reporting and incitement to hatred, violence and discrimination in the broadcast media,[30] but lacks capacities for constant monitoring and investigates mostly cases that are reported by the citizens. The print media and online media, on the other hand, are within the self-regulatory framework of the Press Council of BiH, which, based on citizens' complaints, can decide whether a media outlet has breached the Press and Online Media Code, but it depends on the media's editorial team whether they will remove the content, or issue apologies or corrections. Such mechanism is extremely ineffective especially regarding anonymous media, which are the biggest sources of disinformation, propaganda and hate content, and lack accountability for the content they produce or disseminate. It is very easy and cheap to register a website for the state domain (.ba) or buy a foreign domain and there are no any regulations over the content these websites will produce (Blagovčanin, 2019).

> Even though hate speech can be prosecuted through penal laws but under the 'incitement' to hatred clauses, the election law and regulations of the CRA, cases of hate speech are prosecuted inconsistently and insufficiently.

Even though hate speech can be prosecuted through penal laws but under the 'incitement' to hatred clauses, the election law and regulations of the CRA, cases of hate speech are prosecuted inconsistently and insufficiently (Hodžić, 2019; Sali-Terzić, 2019; Dragičević, 2019; and Lučić-Ćatić et al, 2019). Online

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30   In 2019, the Agency issued 39 fines, many of which for biased reporting. For example, RTRS has been fined three times and FTV once (RAK, 2020).

media have different methods for regulating their comments sections, but sometimes these are left unregulated because they attract more readership and thus revenues, and rarely do media representatives report hate speech to the police or the prosecutor's office.

The fact-checking platform Raskrinkavanje has been active in the last three years debunking thousands of instances of disinformation and fake content, yet the amount of disinformation is still numerous.[31] The media community has reacted negatively to the work of this organization, claiming that they do not have the right and the expertise to create lists of media outlets that publish problematic media content.[32] Raskrinkavanje receives negative comments, including insults and threats, as well as positive ones, with almost 60 thousand followers on their Facebook account.

Other media watchdog platforms, Analiziraj.ba and Media.ba, publish articles analyzing and pinpointing problematic media content and manners of media funding and ownership. Professional organizations and the academic community rarely condemn instances of hate speech and disinformation. What is more troublesome, political elites, however, have not voiced their concerns over hate speech and problematic media content but instead are often sources of divisive messages and polarizing and problematic statements. Political centres of power and certain political and religious groups in BiH, but also foreign actors, such as Russia, Turkey, Serbia and Croatia, have ties and support some media that spread propaganda and disinformation, while (self)regulators and civil society efforts have been limited. In circumstances where professional journalism is in crisis due to a decline in revenues and lack of political support and progressive media policies, the exposure of citizens to professional, ethical journalism is low compared to the content of hate and propaganda models which stem from and further contribute to the divisions in the society.

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31   *See the analyses of the fact-checking platform raskrinkavanje.ba.*
32   *See the articles published by Avaz:* https://avaz.ba/vijesti/teme/497387/kako-kvazinovinar-brkan-potvrduje-svoju-pristrasnost

5. POLICY RECOMMENDATIONS

5.1. General

• The ministries of communication and finance, including those on the cantonal, entity and state levels (Ministry of Communications and Transport of BiH and the Ministry of Finance and Treasury of BiH) should adopt regulations that will include provisions on the transparency of media ownership and precise criteria for the allocation of public funds to the media in consultation with the media industry and civil society organizations. The criteria should include provisions on professional media reporting and adherence to professional media standards and also the circumstances in which the public media and the public service broadcaster can be funded through public budgets. The provisions on the transparency of media ownership should include all the media, including online, that have editorial policies and editorial staff (and not only the registered ones) and all media-related companies (such as advertising companies).

• In consultation with media organization and educational institutions, the Ministry of Civil Affairs should adopt a strategy for media and information literacy that will provide guidelines and ensure funds for its promotion at all state levels and introduction into primary and secondary schools. Media and information literacy should be promoted by the entities' and cantonal governments and civil society organizations.

> Media outlets should be supported, including financially, by the public sector and the donor community, to enable quality reporting, presentation of pluralistic views, and regular verification of information from multiple sources.

• Media outlets should be supported, including financially, by the public sector and the donor community, to enable quality reporting, presentation of pluralistic views, and regular verification of information from multiple sources.

5.2. Specific

5.2.1. Hate Speech

• Criminal laws should be amended to include hate speech with a precise definition. A broader definition of hate speech should be considered which, in addition to "incitement to hatred", would include the spread of negative stereotypes and stigmatization. It is also necessary to ensure, through guidelines for the judiciary, a consistent interpretation of terms such as "incitement", "inflammation", "hatred", "discord" and "hostility" (all terms from criminal laws).

> A broader definition of hate speech should be considered which, in addition to "incitement to hatred", would include the spread of negative stereotypes and stigmatization.

• Prosecutor's offices should open and prosecute cases of hate speech in the online media and online media platforms particularly of

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extreme cases such as Antimigrant. Given that statements containing hate speech made by politicians usually have the highest reach and potential to influence the behaviour of citizens, they should be particularly processed by the judiciary. Information about these cases should be punished proactively. Judges and prosecutors should be capacitated and trained to process online hate speech in particular.

5.2.2. Media

• Online media should adopt rules for the moderation of their comments, particularly regarding hate speech. They should undertake training courses for the regulation of comments in users' sections, which could be organized by media civil society organizations and funded from the public budgets and foreign donors. The Press Council, professional media community and civil society media organizations could organize meetings with media representatives on the regulation of comments sections and prepare and distribute manuals for the regulation of comments in users' sections.
The media should report instances of hate speech to the police and prosecutor's office.

• The media should receive training courses on hate speech, particularly how to deal with problematic statements of politicians in their reports and training courses on disinformation and verification of information. They should be sensitized to diversity and marginalized groups in their course of formal and informal education, drawing on insights from the role of the media in war propaganda, and examples of crimes incited through hate speech.

5.2.3. Civil Society Organizations, the Press Council and CRA

• Civil society organizations should regularly monitor the media and report disinformation, propaganda and hate speech to the self(regulator) or other institutions and organizations. They should organize press conferences and issue reports and statements about the condemnation of hate speech and biased media reporting. They should receive financial and other support from governments and foreign donors.

• Civil society organizations should organize more training courses on media and information literacy, particularly on news literacy and selective and biased reporting, which can be funded through media projects.

• The Communications Regulatory Agency and the Press Council and the fact-checking platform should regularly monitor media content and take action when they detect breaches of professional norms, disinformation, hate speech and biased media reporting. They should also monitor the content of smaller media outlets that publish propagandistic content, hate speech and disinformation and should publish press statements about these examples. They could be identified in consultation with civil society organizations. The Press Council, the fact-checking platform and media monitoring organizations should receive support (including financial) from the state institutions and the donor community.

5.2.4. Political Representatives and the Government

• Political representatives should refrain from using hate speech and giving problematic statements and not give financial and other support to the media that spread disinformation, hate speech and propaganda.

• The regulator and ministries of communication should adopt a strategy and concrete steps for the prevention of organized systems for the spread of disinformation. The codes of the CRA and the Press Council should be amended to include different types of disinformation and a precise definition of disinformation, taking into account their growing presence and spread.

The regulator and ministries of communication should adopt a strategy and concrete steps for the prevention of organized systems for the spread of disinformation.

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