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Bosnia and Herzegovina Indicators on the Level of Media Freedom and the Journalists' Safety Index 2024

Author
Lajla Zaimović Kurtović



CONTENTS

About the Project	2	C. Journalists' safety	33
Methodological Note	3	C.1 Journalists and media actors have access to immediate and effective protective measures	33
Qualitative indicators on the level of media freedom and journalists' safety	4	C.2 Journalists and other media actors (whose lives or physical integrity are at real and immediate risk) have access to special protection or safety mechanisms	34
Journalists' Safety Index	4	C.3 Female journalists have access to legal measures and support mechanisms when faced with gender-based threats, harassment and violence	35
List of Abbreviations	6	C.4 Practice of regular public condemnation of threats and attacks on journalists and media has been established	36
I Introduction	8	C.5 Police authorities are sensitive to journalists' protection issue	37
II Media freedom and journalists' safety in Bosnia and Herzegovina – Indicators	11	C.6 Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists	38
A. Legal safeguards and their implementation	11	C.7 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)	39
A.1 Basic guarantees for media and journalists' freedom and their application in practice	11	C.8 Journalists and other media actors are efficiently protected from various forms of online harassment	40
A.2 Independence and efficiency of the regulatory authority	13	C.9 Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently	41
A.3 Independence and autonomy of the public service media	14	C.10 Quality statistics collection systems established by state authorities to stem impunity	42
A.4 Financial support to quality journalism and media content of public interest	15	C.11 Non-physical threats and harassments	43
A.5 State advertising in the private media sector	16	C.12 Threats against the lives and physical safety of journalists	44
A.6 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	17	C.13 Actual attacks	45
A.7 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely	19	C.14 Threats and attacks on media outlets and journalists' associations	45
A.8 Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities	20	III Conclusions and Recommendations	47
A.9 Journalists are free to pursue their profession and to establish, join and participate in their associations	21	IV Journalists' Safety Index, Bosnia and Herzegovina – 2024	52
A.10 Right to access official documents and information	21		
B. Journalists' position in the newsrooms	25		
B.1 The job positions of journalists are stable and protected at the workplace	25		
B.2 Editorial independence in the private media	26		
B.3 Editorial independence in the public service media	27		
B.4 Editorial independence in the not-for-profit media sector	28		
B.5 Freedom of journalists in the news production process	30		
B.6 Working position of women journalists	31		

About the Project

The journalists' associations from the Western Balkan countries, supported by the EC¹, have established the platform [Safejournalists.net](https://safejournalists.net) to jointly monitor media legislation and practice in their countries and engage in advancing the legal and institutional environment in which the journalists and other media professionals work. Every year, based on a carefully designed methodology², the [Safejournalists.net](https://safejournalists.net) partners conduct advocacy research which has provided journalists' associations with evidence-based, reliable, and relevant data on the main problems and obstacles in the implementation of the EU standards in the field of media and journalists' freedom and safety in the Western Balkans. The results of the advocacy research give substance to partners' activities, providing them with new evidence and examples that refine and strengthen their advocacy positions.

The first qualitative research tool – *Indicators on the level of media freedom and journalists' safety*, was first developed in 2016 and gradually fine-tuned over the years. It is composed of three groups of indicators: (A) Legal protection, (B) Journalists' position in the newsroom, and (C) Journalists' safety. Based on this monitoring tool, a total of seven assessments were published, the last one for 2023.

The quantitative research tool – *Journalists' Safety Index*, was developed in 2020 and tested in 2021. It is designed to 'measure' the changes in the environment that have direct or indirect impact on how safe journalists and other media actors feel when

1 In December 2022, the European Commission approved a new three-year cycle of the Project Safejournalists.net, which is a continuation of the previous two phases: the project Western Balkan's Regional Platform for advocating media freedom and journalists' safety (01.2016- 12.2018) and Safejournalist.net (02.2020-03.2023). The main objective of the Project is to empower and strengthen the role of the national journalists' associations, members of the Platform Safejournalists.net, to become effective and accountable independent actors in advocating and creating relevant media policies in their countries: Independent Journalists Association of Serbia (IJAS), Association of BH Journalists Association (BHJ), Croatian Journalists Association (CJA), Association of Journalists of Kosovo (AJK), Association of Journalists of Macedonia (AJM) and the Trade Union of Media of Montenegro (TUMM). The project is funded under the EU Civil Society Facility and Media Programme in favour of the Western Balkans and Turkey for 2021-2023 (IPA III).

2 The advocacy research is designed and coordinated by Snezana Trpevska and Igor Micevski, research fellows of the Research Institute on Social Development RESIS, from North Macedonia (www.resis.mk).

practicing their profession. It is composed of four groups of indicators: (1) Legal and Organisational Environment, (2) Due Prevention, (3) Due Process, and (4) Actual Safety. Based on this tool, a total of three research cycles were implemented: 2020 (pilot year), 2021 and 2022.

Starting from 2023, the [Safejournalists.net](https://www.safejournalists.net) will combine the two (qualitative and quantitative) research tools into one single advocacy research project - *Indicators on the level of media freedom and Journalists' Safety Index*. The platform monitors the situation in seven countries: Albania, Bosnia and Herzegovina, Croatia, North Macedonia, Montenegro, Kosovo³ and Serbia.

METHODOLOGICAL NOTE

The entire research process is divided into two phases: in the *first phase*, data is collected for all qualitative indicators - both for media freedoms and for the safety of journalists, while in the *second phase*, the qualitative indicators for the safety of journalists are converted into quantitative ones and the procedure of scoring and calculation of the Journalists' Safety Index is carried out.

A range of various research methods were applied to collect and analyse data related to each specific qualitative indicator:

- Review of studies, analyses, research reports, policy papers, strategies and other documents;
- Qualitative analysis of legal documents;
- Retrieval and analysis of information published on the web sites of public institutions and other organisations and bodies;
- Retrieval and analysis of press releases, announcements and other information produced by professional organisations;
- Secondary data collected by journalists' associations;
- In-depth-interviews with experts, journalists, policy makers etc.;
- Focus groups with journalists, and
- Surveys with journalists (in some of the countries).

At national level, the advocacy research is conducted by national researchers who carry out the data collection and draft the narrative reports, which were then reviewed by local media and legal experts and by lead researcher. In Bosnia and Herzegovina, the BH Journalists' Association nominated Lajla Zaimović Kurtović as national researcher and Borka Rudić as media expert to review the report.

³ This name is without prejudice to the status and in accordance with United Nations Security Council Resolution 1244 and the opinion of the Tribunal on the Declaration and Independence of Kosovo.

QUALITATIVE INDICATORS ON THE LEVEL OF MEDIA FREEDOM AND JOURNALISTS' SAFETY

The following table presents all qualitative indicators for the level of media freedom and safety of journalists, divided into three areas. These qualitative indicators are presented in descriptive or narrative form. Part of the indicators that are used in the conceptual framework for the Journalist Safety Index are marked in red on the table.

Overview of all qualitative indicators (Indicators on the level of media freedom and journalists' safety)

A. Legal safeguards and their implementation	B. Journalists' position in the newsrooms	C. Journalists' safety
A.1 Basic guarantees for media and journalists' freedom and their application in practice	B.1 The job positions of journalists are stable and protected at the workplace	C.1 Journalists and media actors have access to immediate and effective protective measures
A.2 Independence and efficiency of the regulatory authority	B.2 Editorial independence in the private media	C.2 Journalists and other media actors have access to special protection or safety mechanisms
A.3 Independence and autonomy of the public service media	B.3 Editorial independence in the public service broadcasters	C.3 Female journalists have access to legal measures and support mechanisms when faced with gender-based threats, harassment or violence
A.4 Financial support to quality journalism and media content of public interest	B.4 Editorial independence in the not-for-profit media sector	C.4 Practice of regular public condemnation of threats and attacks on journalists and media has been established
A.5 State advertising in the private media sector	B.5 Freedom of journalists in the news production process	C.5 Police authorities are sensitive to journalists' protection issue
A.6 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	B.6 Working position of women journalists	C.6 Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists
A.7 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely		C.7 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)
A.8 Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities		C.8 Journalists and other media actors are efficiently protected from various forms of online harassment
A.9 Journalists are free to pursuit their profession and to establish, join and participate in their associations		C.9 Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently
A.10 Right to access official documents and information		C.10 Quality statistics collection systems established by state authorities to stem impunity
		C.11 Non-physical threats and harassments
		C.12 Threats against the lives and physical safety of journalists
		C.13 Actual attacks
		C.14 Threats and attacks on media outlets and journalists' associations

JOURNALISTS' SAFETY INDEX

Taking into consideration the standards and recommendations established by the Council of Europe and other international

organisations, the concept of “journalists’ safety”⁴ was operationalised by considering the following four dimensions:

- I. **Legal and Organisational Environment** – the existence and implementation of legal safeguards relevant for the safety of journalists.
- II. **Due Prevention** – the existence and implementation of a range of preventative measures that have direct effects on journalists’ protection and safety.
- III. **Due Process** – the behaviour of state institutions and public officials towards journalists and the efficiency of the criminal and civil justice system concerning the investigations of threats and acts of violence against journalists.
- IV. **Actual Safety** – incidents and instances of various forms of threats and acts of violence against journalists and media.

The table below presents the four dimensions and indicators that make up theoretical model of the “journalists’ safety” concept. Data for all these indicators were collected in the first phase of the research, and in the second phase, based on the collected research evidence, nine members of the Advisory Panel from each of the countries⁵ assessed the situation and assigned scores for each of the 19 indicators:

Overview of indicators related to the Journalists’ Safety Index

I. Legal and Organisational Environment	II. Due Prevention	III. Due Process	IV. Actual Safety
1.1 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	2.1 Journalists and media actors have access to immediate and effective protective measures	3.1 Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists	4.1 Non-physical threats and harassments
1.2 Confidentiality of journalists’ sources is guaranteed in the legislation and respected by the authorities	2.2 Journalists and other media actors have access to special protection or safety mechanisms	3.2 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently	4.2 Threats against the lives and physical safety of journalists
1.3 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely	2.3 Female journalists have access to legal measures and support mechanisms	3.3 Journalists and other media actors are efficiently protected from various forms of online harassment	4.3 Actual attacks
1.4 Journalists are free to pursue their profession and to establish, join and participate in their associations	2.4 Practice of regular public condemnation of threats and attacks on journalists and media	3.4 Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently	4.4 Threats and attacks on media outlets and journalists’ associations
1.5 The job positions of journalists are stable and protected at the workplace	2.5 Police authorities are sensitive to journalists’ protection issue	3.5 Quality statistics collection systems established by state authorities to stem impunity	

4 Researchers from the RESIS Institute (www.resis.mk), Snežana Trpevska, Igor Micevski and Ljubinka Popovska Toševa developed the [conceptual and methodological framework](#) for the Index and the model for its aggregation, weighting and calculation.

5 Members of the Advisory Panel in Bosnia and Herzegovina were Dejan Lučka, Rubina Čengić, Hasan Gabela, Ljiljana Smiljanić, Vera Soldo, Željka Mihaljević, Velida Kulenović, Tanja Topić and Fuad Kovačević.

Note: When the male form is used in this report, it always refers simultaneously to female, male and diverse individuals. Multiple designations are omitted for the sake of better readability.

— LIST OF ABBREVIATIONS

BD – Brčko District

BHRT – Bosnia and Herzegovina Radio and Television

BiH – Bosnia and Herzegovina

BIRN BiH – Balkan Investigative Reporting Network BiH

CC – Criminal Code

CIN – Centre for Investigative Reporting

CoE – Council of Europe

CPC – Criminal Procedure Code

CRA – Communications Regulatory Agency

EC – European Commission

ECtHR – European Court of Human Rights

EU – European Union

FBiH – Federation of Bosnia and Herzegovina

FMHL – Free Media Help Line

FOIA – Freedom of Access to Information Act

FTV – Federal Television

GREVIO – Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (monitoring the implementation of the Istanbul Convention)

HDZ – Croatian Democratic Union

HJPC – High Judicial and Prosecutorial Council of Bosnia and Herzegovina

LGBTIQ – Lesbian, gay, bisexual, transgender, intersex, or questioning

MJG – Media Justice Group

NARS – National Assembly of the Republika Srpska

OSCE – Organization for Security and Co-operation in Europe

RFE – Radio Free Europe

RTRS – Radio Television of the RS

RTV – Radio and Television

SDA – Party of Democratic Action

SIPA – State Investigation and Protection Agency

SLAPP – Strategic Lawsuits Against Public Participation

SNSD – Alliance of Independent Social Democrats

the RS – the Republika Srpska

TI – Transparency International

UN – United Nations

Introduction

Bosnia and Herzegovina (hereinafter: BiH) is a decentralised parliamentary republic whose complex constitutional system is embedded in the Dayton Peace Agreement. The entities – the Federation of Bosnia and Herzegovina (hereinafter: the FBiH) and the RS (hereinafter: the RS) – have their own constitutions, as do all ten cantons in the FBiH, while the Brčko District (hereinafter: the BD) has a special status regulated by its Statute. However, although all constitutions guarantee fundamental human rights and freedoms, the extremely complex and fragmented legal and institutional framework, as well as the division of competencies, result in significant legal uncertainty and uneven application of the law. In BiH, 2024 was marked by local elections, political and social turmoil, institutional blockades, slow progress, and a natural disaster. At the beginning of the year, the ruling coalition defined priorities aimed at accelerating reforms necessary for continuing the European path. In March 2024, BiH received the green light to open accession negotiations, conditional upon the adoption of key laws. However, throughout the year political tensions took precedence, and political conflicts paralysed the work of institutions, resulting in stalled reforms and further distancing from the EU. As the local elections scheduled for October 2024 approached, nationalist rhetoric intensified. The peak of the political crisis occurred towards the end of the year, when the National Assembly of the Republika Srpska (NSRS) adopted conclusions blocking the work of state institutions and ordering the obstruction of European integration processes, citing alleged “politically motivated proceedings” by the Court and Prosecutor’s Office of BiH.

Such a polarised political climate, along with persistent verbal attacks against dissenters, hate speech, and nationalist rhetoric, significantly undermined media freedom. Political pressures, intimidation, and threats against journalists continued, including constant verbal attacks and inciting rhetoric, creating a hostile environment for media freedom.⁶ In

6 [Bosnia and Herzegovina 2024 Report](#), page 46.

the World Press Freedom Index of Reporters Without Borders,⁷ BiH recorded a drop of 17 places, the largest decline among all Western Balkan countries – from 64th to 81st place. This decline was largely caused by the criminalisation of defamation in the RS, as well as attempts to introduce the so-called “foreign agents” law. Additionally, although fewer than in the previous year, a significant number of threats and attacks against journalists were recorded in BiH in 2024. Journalists do not feel protected while performing their work, lack sufficient support from their newsrooms and editors, and often do not report attacks and threats due to a lack of trust in the system. In 2024, no steps were taken to improve the legal framework or to ensure more effective protection of journalists and media freedom. In its 2024 Nations in Transit report, Freedom House classified BiH as a “transitional hybrid regime,” hovering between autocracy and democracy, and noted that the country continues to decline even within this category. According to the report, due to the re-criminalisation of defamation in the RS, as well as a series of other legislative changes of concern for the media and civil society, journalists have come under additional pressure in an environment already undermined by hate speech and threats to physical safety.⁸ The overall democracy score for BiH according to Freedom House fell from 3.21 in 2023 to 3.18 in 2024, while the score for media independence dropped from 3.25 to 3.00.⁹ After dropping in 2023 on the Civicus Monitor from the category of countries with “narrowed” civic space to those where fundamental freedoms are “obstructed” due to increasing attacks on activists, journalists, and LGBTIQ+ groups, BiH remained in the same category throughout 2024.¹⁰

GDP per capita stood at USD 9,358.8,¹¹ which, although slightly higher than in 2023, still places BiH near the bottom in Europe. The journalistic profession remains insecure and poorly paid, while the economic environment for the media is unfavourable due to a small market and a lack of sustainable financing. The difficult economic situation and dependence on political and economic actors – creating pressure on media and leading to censorship – undermine the strength of critical journalism. Although BiH has at least 110 TV channels, 150 radio stations, eight daily newspapers, seven news agencies, around 180 magazines, and approximately 600 newspaper/online outlets, this number of media does not guarantee genuine pluralism of media content, information, and opinions. In terms of ownership and revenue sources, there are three types of media: private media with predominantly commercial revenues; the public RTV system; and local radio and TV stations financed from cantonal and municipal budgets. The public broadcasting system consists of Radio and Television of BiH (BHRT), Radio and Television of the FBiH (RTV FBiH), and Radio and Television of the RS (RTRS), financed through the RTV license fee and advertising. A major ongoing problem is the mutual debts arising from the collection of the RTV fee, which jeopardise the

7 [World Press Freedom Index](#), Reporters Without Borders, 2024.

8 [Nations in Transit 2024 Report](#), Freedom House, 2024, page 6.

9 *Ibid.*, page 29.

10 [Tracking Civic Space](#), Civicus Monitor, 2024.

11 [GDP per capita BiH](#), World Bank.

survival of public broadcasters – particularly BHRT. A series of additional media-relevant laws is still needed to permanently regulate and harmonise these issues at the state level.



Media freedom and journalists' safety in Bosnia and Herzegovina – Indicators

A. LEGAL SAFEGUARDS AND THEIR IMPLEMENTATION

– A.1 BASIC GUARANTEES FOR MEDIA AND JOURNALISTS' FREEDOM AND THEIR APPLICATION IN PRACTICE

The right to freedom of expression and information is guaranteed by constitutions at all levels of government in BiH – state, entity, and cantonal. These constitutions stipulate that the rights and freedoms guaranteed by the European Convention on Human Rights and Fundamental Freedoms are directly applicable and have priority over all other laws. Although the legal framework is largely aligned with international standards, the modernisation of public policies in the media sector has stagnated in recent years. Due to the extremely complex constitutional structure, the legal framework for exercising the right to freedom of expression and information comprises a complex system of institutions, norms, and practices, resulting in variations in media freedom guarantees across the country.

The Law on Communications of BiH applies exclusively to electronic media, which are regulated by the Communications Regulatory Agency (CRA). At the state and entity levels, there are also laws governing the public RTV system, the Law on Radio and Television of BiH, as well as laws on freedom of access to information of public importance. In the RS, the field of public information is regulated by the Law on Public Information – which is largely outdated – and the RS Law on Radio and Television. In the FBiH, this field is divided between the Federation authorities and the cantons: the Federation is responsible for regulating the entity public broadcaster RTV FBiH, while cantons have jurisdiction over public local radio and TV stations, including regulations on their establishment and operation.

Freedom of expression and information also encompasses access to the internet, although the online sphere is not regulated by a

comprehensive state-level law. Self-regulation of online media has limited effect, and online platforms continue to be used for spreading hate speech and disinformation. In 2023, discussions were initiated on the co-regulation of online content through joint efforts by regulators and self-regulators, accompanied by a dedicated study. The study provides a detailed analysis of existing European standards and models and places them within the Bosnian regulatory context related to protection against harmful online content.¹² It also proposes the development of multi-sector cooperation across society, alignment of online regulation in BiH with European standards defined by the Digital Services Act, adoption of regulations on transparency of media ownership and advertising, development of a strategy to combat disinformation and hate speech, and strengthening institutional capacities.¹³ By the end of 2024, no regulation of digital platforms had been introduced.

In 2024, the negative effects of numerous legislative initiatives from 2023 were felt, such as the criminalisation of defamation through the RS Criminal Code (RS CC), which introduced criminal offenses against honour and reputation, including criminal sanctions for defamation and disclosure of personal and family circumstances. The RS Government also adopted the Law on the Special Register and Publicity of the Work of Non-Profit Organisations, known as the 'foreign agents' law. The international community, media, and civil society deemed this law unacceptable,¹⁴ as it envisaged special oversight of NGOs funded from abroad, bans on political activities, additional registration requirements, and mandatory financial reporting. Non-profit organisations were defined as 'agents of foreign influence' if they engaged in political activities, influenced public opinion, or 'undermined the integrity and Constitution of the RS'. The second reading of the law was planned for May 2024, but the law was withdrawn for further alignment with EU standards.

Although authorities in the RS announced the adoption of a Media Law with much fanfare, no progress had been made by the end of 2024. Likewise, at the state and entity levels, criminal legislation has not been amended to define attacks against journalists as a criminal offense. The long-announced Law on Transparency of Media Ownership – considered crucial for media regulation and transparent operations – has also not been adopted. A draft of this law was prepared as early as 2018, but by the end of 2024 the Ministry of Communications and Transport of BiH had not submitted it to parliamentary procedure. In 2024, a (new) Working Group was established within the Ministry of Communications and Transport to prepare a preliminary draft of the Law on Transparency of Media Ownership in BiH, aimed at aligning domestic legislation with European standards and ensuring the public's right to information on media ownership. By the end of 2024, the Working Group had not held a single meeting.

12 [Towards Coregulation of Harmful Content Online in Bosnia And Herzegovina A study of European standards and co-regulatory practices for combating harmful content online](#), Council of Europe 2023.

13 Ibid.

14 [Joint Opinion of the Venice Commission and the OSCE/ODIHR on the draft law of the Republika Srpska on the Special Registry and Publicity of the Work of Non-Profit Organizations](#), Venice Commission of the Council of Europe, Venice, June 9-10 2023.

In 2024, there were no recorded attempts in BiH to impose licensing or other strict requirements for establishing print and online media. Courts are responsible for maintaining the register of public media. The register of print and online media is maintained by the Press and Online Media Council, while the CRA maintains the register of electronic media and issues broadcasting licenses.

— A.2 INDEPENDENCE AND EFFICIENCY OF THE REGULATORY AUTHORITY

The selection and competencies of the CRA are regulated by the Law on Communications of BiH. The governing bodies of the CRA are the Council and the Director, with the Council serving as an appellate body for decisions made by the Director General. The seven-member Council is appointed by the BiH Parliamentary Assembly for a four-year term, with the possibility of one reappointment. After the Council's mandate expired in 2017, the BiH Council of Ministers appointed new members only seven years later, in March 2024. Unlike previous compositions, the new Council includes women. Confirmation of the new Council by the Parliamentary Assembly was delayed until October 2024. A public competition for the appointment of a new Director General is also ongoing, as the mandate of the current Director, Draško Milinović, expired in July 2024.

The independence of the CRA is defined in Article 36 of the Law on Communications, which stipulates that the Agency is a functionally independent, non-profit institution with legal personality, required to operate in accordance with principles of objectivity, transparency, and non-discrimination, and whose representatives should act in the interest of BiH and its citizens as a whole. Article 36(3) prohibits interference by the Council of Ministers, individual ministers, or other persons in the Agency's decision-making in individual cases. Despite this, the Agency's independence is undermined by provisions of the Law on Financing of the Institutions of BiH,¹⁵ which define the Agency as a budgetary institution. The Law on Communications also stipulates that the Agency's budget is directly linked to sectoral policies of the Council of Ministers, and that the Director General submits the proposed budget for each fiscal year to the Council of Ministers for approval. The European Commission (EC) has repeatedly assessed that the CRA still lacks full political and financial independence,¹⁶ a concern also highlighted by the U.S. State Department in its 2024 Human Rights Report on Bosnia and Herzegovina.¹⁷ The procedure for appointing its leadership does not guarantee pluralistic representation of stakeholders or full independence from political influence. Civil society organisations have repeatedly emphasised the need to amend these procedures to improve public perception of the Agency as a neutral and independent body.¹⁸

15 [Law on Financing of the Institutions of Bosnia and Herzegovina](#), Article 2, paragraph 1, item n.

16 [European Commission Report on Bosnia and Herzegovina for 2024](#), p. 80.

17 [Bosnia and Herzegovina 2024 Human Rights Report](#), U.S. State Department, 2024, p. 7.

18 [European Commission Report on Bosnia and Herzegovina for 2023](#).

In the process of granting broadcasting licenses, the CRA issues public calls and participation criteria, and the process is conducted in a fair and neutral manner. Legal entities must be registered in BiH to perform telecommunications-related activities and must not have any outstanding financial obligations to the Agency on any grounds.

— A.3 INDEPENDENCE AND AUTONOMY OF THE PUBLIC SERVICE MEDIA

The public broadcasting system consists of the Radio and Television of BiH (BHRT), the Radio and Television of the FBiH (RTV FBiH), the Radio and Television of the RS (RTRS), and the Corporation of Public RTV Services of BiH. The Corporation, which was supposed to have joint competencies over all three public services, has never been established in practice. Laws and statutes governing public broadcasters stipulate that public RTV services operate independently, enjoy editorial independence, and possess institutional autonomy. However, prescribed norms do not guarantee real autonomy and independence of public broadcasters, which remain exposed to strong political influence. Authorities in the RS use the public service RTRS as a propaganda tool, while RTV FBiH is characterised by pronounced fragmentation of political influence. Susceptibility to various political pressures is particularly evident during the process of appointing members of boards of governors, which are elected by parliaments. From 2013 through the end of 2024, the FBiH Parliament failed to fill vacant seats on the RTV FBiH Board of Governors, nor was a director of the Federation public broadcaster appointed. Džemal Šabić served as Director of RTV FBiH from 2008, with his mandate being unlawful for more than ten years.

Reform of the public RTV system in BiH, in line with the Constitution, was one of the objectives of the Agreement on the Formation of Government at the state and Federation levels following the 2022 General Elections; however, by the end of 2024, the announced reforms had not been implemented. Although announced, the BiH Ministry of Transport and Communications did not adopt a new Law on the Public RTV System of BiH. A Working Group was established to draft a new law, but its members could not agree on the prepared draft and therefore requested that representatives of all three public broadcasters prepare separate proposals. Individual proposals were completed on 11 December 2024, but by the end of the year no progress had been made towards adoption of the new law.

Public broadcasters are financed through the RTV fee, marketing and other revenues, as well as from their own activities and budgets.¹⁹ The Statute of RTV FBiH emphasises that budget financing must not affect programmatic independence. One of the 14 priorities of the EC for BiH's progress towards the EU is stable financing of public RTV services. However, public broadcasters have for years been

19 [Article 38 of the Law on RTRS](#); Article 29 of the [Statute of BHRT](#); Articles 25 and 26 of the [Statute of RTV FBiH](#).

in a difficult financial situation, burdened by significant mutual debts, particularly due to problems with collection of the RTV fee.²⁰ According to the EC's 2024 Report, BHRT remains in serious danger of shutdown due to years-long withholding of the distribution of the RTV fee among the three public broadcasters in accordance with the law.²¹ RTRS withdrew from the joint fee collection system in 2017 and has since not shared fee revenues with the other two broadcasters, prompting BHRT to initiate multiple court proceedings to recover debts exceeding EUR 31.5 million.²² BHRT was also in dispute with FTV over distribution of RTV fee revenues, leading it to adopt a temporary decision on 8 May 2024 to cease broadcasting the RTV FBiH programme, except for this service's news programmes. Over the years, budgetary funding for public media has continuously increased, while the share of their own revenues from marketing and RTV fee collection has significantly declined. Growing dependence on budget subsidies seriously undermines editorial independence.

Public broadcasters each have four members on their Boards of Governors, which also serves as the supervisory body. Laws governing all three public broadcasters define, as a key criterion, national representation in the appointment of Boards of Governors' members – three from among the constituent peoples and one from among Others. This appointment principle does not ensure equal representation of all social groups nor their programmatic needs and interests in public information. Boards of Governors establish a Programme Council, which has an advisory role and is intended to contribute to balanced representation and protection of the public interest in programme content. In both entity-level public broadcasters, Programme Councils have 11 members and consist of representatives of society from various fields and institutions. There is no publicly available information on consultations with civil society, nor on how Programme Councils protect public interest in public broadcasters' programming.

— A.4 FINANCIAL SUPPORT TO QUALITY JOURNALISM AND MEDIA CONTENT OF PUBLIC INTEREST

Funds for media are allocated at all administrative levels in BiH, through various procedures and for different purposes. This includes regular co-financing of public media, short-term funding for specific media content and coverage of particular topics, as well as other forms of individual assistance, such as allocation of surplus revenues from public institutions and enterprises to media outlets. There are no dedicated funds in BiH to encourage the production of pluralistic media content, nor special subsidy mechanisms for print media. The public sector allocates tens of millions of BAM annually for media and media content, but the public lacks adequate insight into allocated amounts, criteria, and procedures for such allocations, leaving room for manipulation and influence over media through financing. The Anti-Corruption Strategy

20 Predrag Zvijerac, [Bh. televizija u blokadi od 30 miliona eura](#), RSE, 15 December 2021.

21 [European Commission Report on Bosnia and Herzegovina for 2024](#).

22 [European Commission Report on Bosnia and Herzegovina for 2023](#).

2024–2028 and its accompanying Action Plan envisage measures for publishing information on media financing from public funds on an ongoing basis through regular budgetary resources. The Strategy was adopted in June 2024.

CRA analyses show that media insufficiently address topics related to national minorities, with such content being extremely scarce in television and radio programmes.²³ There are no private or non-profit media in the languages of national minorities, nor any financial mechanisms to encourage or develop such content, even within public media services. Although one of the programme principles of public RTV services is respect for national, regional, traditional, religious, cultural, linguistic, and other characteristics of constituent peoples and all citizens of BiH, as well as promotion of cultural and other needs of national minorities in BiH,²⁴ there are no quotas for programmes intended for national and other minorities. In 2020, CRA prescribed explicit programme quotas for public radio and television services, obliging them to broadcast at least one hour per week of programming intended for national minorities, ensuring balanced representation. CRA plans to impose an obligation to broadcast programmes intended for members of national minorities on other RTV stations as well, since the current legal framework applies only to public RTV services. According to the Evaluation by the Committee of Experts of the European Charter for Regional or Minority Languages (2022), BHRT does not broadcast content in minority languages.²⁵ An exception is RTRS, which since 2019 has aired the programme *Mala Evropa* on minorities. Regarding other license holders, the percentage representation of individual programme segments on minorities is determined by individual license conditions.²⁶

— A.5 STATE ADVERTISING IN THE PRIVATE MEDIA SECTOR

BiH has not adopted a law on advertising at the state level, and the majority of advertising revenue does not remain in the country.²⁷ Laws on unfair advertising exist at the entity level, but they do not regulate advertising in media; they instead apply exclusively to traders. In practice, advertising is regulated by several laws, rules, and codes that are not mutually harmonised. Some of the laws relevant to advertising include the Consumer Protection Law, the Public Procurement Law, the Law on the Public RTV System of BiH, CRA broadcasting rules, the Press Council Code, and other regulations such as the Food Law or the Law on Restricting the Use of Tobacco Products. The Law on Communications of BiH stipulates, among broadcasting regulatory principles,

23 [Analysis of children's and educational programmes, programmes intended for or dealing with minorities and vulnerable population groups, and programmes adapted for persons with disabilities in audiovisual media services and radio media services in Bosnia and Herzegovina](#), CRA, 2019.

24 [Law on the Public RTV System of Bosnia and Herzegovina](#), Article 26, Programme Principles.

25 [Third Evaluation Report on Bosnia and Herzegovina](#), Committee of Experts of the European Charter for Regional or Minority Languages, 2022.

26 Ibid.

27 [E-novinar](#), Year VII, No. 58, BH Journalists Association.

that advertising through broadcasters should be regulated in accordance with best European practice.²⁸

Distribution of state advertising funds is non-transparent and discriminatory. It is estimated that government institutions at all levels in BiH spend around BAM 30 million annually on media. Approximately BAM 1.5 million is spent annually on publishing advertisements, public calls, and tenders, while more than BAM 5 million per year is spent on engaging media to cover the work of municipal authorities or produce chronicles of current events and other promotional activities. Allocation of public funds to media has increased over time, with party-based budget financing of private media being particularly noticeable in the RS.

Institutions do not regularly publish data on amounts allocated to media. The Public Procurement Law exempts contracts for the acquisition, development, and (co-)production of radio and TV programmes,²⁹ allowing funds from municipal/city budgets to be allocated for these purposes without public calls, thereby leaving room for political clientelism.

The EC's 2024 Report reiterates recommendations from 2023, particularly that BiH should adopt laws on transparency of media ownership and criteria for public advertising.³⁰ According to the EC's 2023 Report, advertising practices of public enterprises, such as telecommunications companies, and marketing agencies linked to political parties continue to harm media integrity, which remains fully applicable in 2024.

— A.6 LEGAL PROVISIONS RELATED TO DEFAMATION AND THEIR APPLICATION DO NOT CREATE A CHILLING EFFECT ON JOURNALISTS AND THE MEDIA

The significant decline in media freedoms in BiH in 2024 was largely driven by the re-criminalisation of defamation in the RS,³¹ which entered into force in August 2023 through amendments to the RS CC introducing the criminal offense of defamation. These amendments define more closely criminal offenses against honour and reputation, defamation, disclosure of personal and family circumstances, as well as the offense of public ridicule based on race, religion, or nationality. Penalties for the offenses range from BAM 1,000 to BAM 6,000.

Higher fines are prescribed when defamation is committed through the media, including computer networks or public gatherings.³²

28 [Law on Communications of Bosnia and Herzegovina](#), Regulatory Principles of Broadcasting and Telecommunications, Article 4 (1) e.

29 [Law on Public Procurement of Bosnia and Herzegovina](#), Article 10a, Exemptions for public service procurement contracts.

30 [European Commission Report on Bosnia and Herzegovina for 2024](#), p. 8.

31 Defamation was decriminalised throughout Bosnia and Herzegovina in the early 2000s, making BiH the first Western Balkan country to decriminalise defamation. In 2022, at the initiative of the RS President, Milorad Dodik, announced via the social network Twitter, a procedure was launched to amend the RS CC, under which defamation and insult would again become criminal offences.

32 [Criminal Code of the Republika Srpska](#), Defamation, Article 208a (2) – If the offence referred to in paragraph 1 of this Article is committed through the press, radio, television, computer network or other forms of communication, at a public gathering or in another manner, whereby it becomes accessible to a larger number of persons, the perpetrator shall be punished by a fine ranging from BAM 2,000 to BAM 5,000.

Domestic and international audiences emphasised that this offense was introduced precisely to 'discipline' journalists and protect public officials. The international community and organisations such as the UN, CoE, EU, and OSCE in BiH, as well as UN Special Rapporteurs, condemned this move by the RS authorities. Public and institutional pressure had some effect, leading to adoption of provisions allowing greater protection for journalists and media if they can prove that certain content was published in the course of journalistic work. Criminalisation of defamation in the RS affects not only freedom of expression in the RS but throughout BiH. Legal experts explain that residents of the FBiH or other states who publish defamatory content concerning persons from the RS may also face the possibility of criminal prosecution.

Protection against defamation in civil proceedings is regulated by entity-level laws. These laws do not provide special protection for public officials, who may file lawsuits only in their personal capacity. Public bodies are not allowed to initiate defamation proceedings. According to legal provisions, compensation claims are considered urgent, and awarded amounts must be proportionate to the harm caused to the injured party's reputation. The amount of non-pecuniary damages is determined at the court's discretion. The Law on Obligations provides that the court may award fair monetary compensation in cases of violations of reputation, honour, freedom, or personality rights. In deciding the amount, the court must consider the significance of the violated right and the purpose of compensation, while ensuring it does not serve inappropriate aims. In practice, awarded amounts generally do not exceed BAM 5,000, aiming to avoid serious financial hardship for defendants. Judgments dismissing lawsuits filed by politicians are rare, leading journalists to perceive these proceedings primarily as a form of political pressure. High monetary penalties further complicate media operations, especially amid poor economic conditions in the sector. Investigative media are particularly affected, as their journalists and editors often face multiple active cases and spend significant time in court rather than in the newsroom. When a media outlet faces five or more lawsuits, its economic sustainability may be seriously jeopardised, threatening the survival of the newsroom.

By the end of 2024, nearly 200 criminal complaints had been filed in the RS, including 38 against journalists, editors, and media owners. According to available information, one indictment was filed and one judgment rendered in Banja Luka, indicating cautious and thorough handling by the RS prosecutors in reviewing criminal complaints and potential criminalisation of freedom of expression. In 2024, BH Journalists Association and the Free Media Help Line (FMHL) registered 17 new civil defamation cases, with plaintiffs mostly being politicians and politically connected businesspersons. FMHL lawyers represent media outlets and journalists in 21 cases before BiH courts and the European Court of Human Rights (ECtHR) in Strasbourg related to defamation and violations of freedom of expression.

— A.7 OTHER LAWS ARE ENFORCED OBJECTIVELY AND ALLOW JOURNALISTS AND OTHER MEDIA ACTORS TO WORK FREELY AND SAFELY

There are no protective measures or provisions in the legislation of BiH that would protect journalists and the media from SLAPPs. In December 2023, an initiative was submitted for the adoption of the FBiH Law on Citizen Initiative and the Protection of Citizens and Activists, whose draft includes anti-SLAPP provisions.

In June 2024, the House of Representatives of the FBiH Parliament adopted the Draft of this Law; however, by the end of 2024 the adoption procedure had not been completed.

During 2024, BH Journalists Association recorded 14 new SLAPPs. Investigative and independent media were targeted by SLAPPs, including the Centre for Investigative Reporting (CIN) and N1 TV, as well as portals such as Žurnal, Capital.ba, Bljesak.info, Valter, Tačno.net, Raport, Focus, etc. Although journalists and media outlets are most often mentioned in the context of such lawsuits, an increase in SLAPPs against citizens, activists, civil society representatives and human rights defenders has also been recorded. This number increased significantly after defamation was re-criminalised in the RS.³³ In total, 53 SLAPPs were reported in BiH in 2024.

The announced laws on preventing the spread of disinformation and hate speech in the Una-Sana Canton and Sarajevo Canton were put “on hold” due to numerous objections from journalists’ associations and civil society in BiH, as well as from international organisations. In the RS, an initiative was launched to adopt a Law on Media, and a special working group was formed for this purpose.

In the RS, the CC contains provisions prescribing prison sentences of up to three years for those who, through print media, radio, television, computer systems or social networks, at public gatherings or in public places or otherwise, publicly call for, incite or encourage, or make available to the public leaflets, images or other materials calling for violence or hatred directed against a person or groups on the grounds of their national, racial, religious or ethnic affiliation, skin colour, sex, sexual orientation, disability, gender identity, origin or other characteristics.³⁴

In the BD BiH and at the cantonal level, there are provisions related to misdemeanour sanctions for the dissemination of false information within laws on public order and peace. Fines in the BD range from BAM 100 to 500,³⁵ but no attempts to silence journalists or restrict freedom of expression on the basis of these legal provisions have been recorded.

33 [Policy Paper: From Silence to Strength: A Regional Response to SLAPPs in the Western Balkans](#), Balkan Civil Society Development Network (BCSDN), 2024.

34 [Criminal Code of the Republika Srpska](#), Article 359(1).

35 [Law on Public Order and Peace of the Brčko District](#), Article 10 (Dissemination or transmission of false news, rumours or claims): Anyone who disseminates or transmits false news, rumours or claims that may cause public disturbance or endanger public order and peace shall be punished by a fine ranging from BAM 100 to BAM 500.

— A.8 CONFIDENTIALITY OF JOURNALISTS' SOURCES IS GUARANTEED IN THE LEGISLATION AND RESPECTED BY THE AUTHORITIES

The confidentiality of journalistic sources is guaranteed by defamation laws and criminal procedure laws at all levels of government and is defined by the Press and Online Media Code of BiH. Criminal Procedure Codes (CPCs) stipulate that journalists cannot be questioned as witnesses for the purpose of protecting sources of information.³⁶ Defamation laws prescribe that journalists have the right not to disclose the identity of their sources.³⁷ This right also includes the right not to disclose any document or fact that could reveal the identity of a source, particularly oral, written, audio, visual or electronic material.

Additionally, the Press and Online Media Code of BiH obliges journalists to protect the identity of their sources, regardless of whether those persons requested confidentiality or not. This is also defined in the Guidelines for cooperation between Police and Media developed by the OSCE Mission to BiH, which stipulate that the police must not use coercive or intimidating methods to force journalists to reveal their sources of information.

In June 2024, the State Investigation and Protection Agency (SIPA) contacted the editorial office of TV Hayat with the intention of determining how they obtained a document sent by the Government of Serbia to the BiH security structures, as well as a recording of a conversation between Hungarian Foreign Minister Péter Szijjártó and the President of HDZ BiH, Dragan Čović, broadcast in the programme Investigation of the Week. Journalist Avdo Avdić, editor of the Istraga portal, was questioned at SIPA premises with the same objective – to reveal his sources.

With the amendments to the RS CC, the journalistic community in the RS, as well as in the rest of BiH, has become concerned about the possibility of becoming subject to defamation investigations and being exposed to investigative actions and measures to prove a criminal offence (wiretapping, surveillance, searches, seizure of property, etc.). This has also called into question the obligation to protect journalistic sources of information. Some investigative media have introduced the practice of cooperating with lawyers on legally 'sensitive' issues, such as publishing protected documents or covert unauthorised recordings for investigative reporting purposes. Journalists and editors reporting on corruption and crime are aware of the risk of being subjected to surveillance.³⁸

36 BiH CPC, Article 82; RS CPC, Article 147; FBiH CPC, Article 96; BD CPC, Article 82.

37 BiH Law on Protection from Defamation, Article 9; RS Law on Protection from Defamation, Article 10; FBiH Law on Protection from Defamation, Article 9; BD Law on Protection from Defamation, Article 9.

38 Milica Stojanović, [Surveillance States: Monitoring Journalists in Central and Southeast Europe Without Oversight](#), Balkan Insight, BIRN, 14 September 2023.

— A.9 JOURNALISTS ARE FREE TO PURSUIT THEIR PROFESSION AND TO ESTABLISH, JOIN AND PARTICIPATE IN THEIR ASSOCIATIONS

In 2024, there were no significant changes regarding trade-union organisation and association of journalists. Journalists in BiH do not require work permits or licences from the state, and no attempts to introduce licensing have been recorded. Journalists do not face problems being recognised as such by public institutions or authorities. However, cases of obstruction of journalists' work by public officials have been recorded. In October 2024, the day after local elections, the Mayor of Zenica, Fuad Kasumović, announced that he would ban access to public information and events to a number of local media outlets in the city (Zenicablog portal and Radio Zenica). Subsequently, attendance at sessions of the Zenica City Council was banned for all journalists and media outlets except RTV Zenica, whose founder is the Zenica City Council.

There are no publicly available data on pressure exerted on journalists by authorities, media owners or persons in positions of power to join specific associations, nor on the establishment of parallel or fake media associations backed by politicians and/or government representatives.

Journalists are free to join trade unions and professional associations. This right is guaranteed by several laws, primarily labour laws. At neither the state nor the entity level has a separate trade union exclusively representing journalists been established. The majority of journalists in BiH are members of one of the journalists' associations, while some are members of media workers' trade unions that exist within public broadcasters, which are also the most numerous.³⁹

There are five journalists' associations in BiH: the BH Journalists Association, the Association of Journalists of the RS, the Croatian Journalists' Association, the Journalists' Society of BiH, and the Network of Women Journalists in BiH. There are no official and precise data on the number of journalists in BiH, but it is estimated to be between two and three thousand. Most journalists are members of one or more listed associations.⁴⁰

— A.10 RIGHT TO ACCESS OFFICIAL DOCUMENTS AND INFORMATION

Journalists in BiH use legal rules on access to information and official documents of public interest, regulated by laws on freedom of access to information at the state and entity levels (FOIA)⁴¹. In 2023, the BiH Parliamentary Assembly adopted a new Law on Freedom of Access to Information at the level of BiH institutions, defining that the law applies exclusively to state-level institutions. As a result, the BD BiH remained

39 More than 60% of journalists are members of one of the journalists' associations, and around 18% are members of trade unions operating in BiH. [Indicators of the Level of Media Freedom and the Journalists' Safety Index for BiH 2023](#), BH Journalists Association, 2025.

40 Enes Osmančević and Adis Šušnjar, [Istraživanje integritet novinarstva i transparentnost medija u BiH](#), TI BiH, 2021.

41 [Law on Freedom of Access to Information at the Level of BiH Institutions](#) (Official Gazette of BiH, 61/23 of 5 September 2023); [FBiH Law on Freedom of Access to Information](#) (Official Gazette of the FBiH, 32/01 and 48/11); and [RS Law on Freedom of Access to Information](#) (Official Gazette of the RS, 20/2001).

without a legal basis ensuring the application of freedom of access to information.⁴² The BD has still not adopted a new law in this area, although activities in that direction are ongoing.⁴³ Nevertheless, the BD Statute provides that all District institutions must respect freedom of information and that officials should ensure public insight into the District's activities, public documents, decisions and official meetings through timely, accurate and complete provision of information.

According to the new FOIA, all information held by BiH institutions is considered open and public, unless its non-disclosure is fully justified and based on legally prescribed exceptions.⁴⁴ The expanded list of exceptions sparked numerous debates in both chambers of the BiH Parliamentary Assembly, among the media and civil society organisations. During the legislative process, more than 200 comments were submitted, but they were not taken into account. Particular criticism was directed at the expanded list of exceptions to access to information, as well as provisions stipulating that appeals against institutional decisions would be decided by the Appeals Council within the BiH Council of Ministers, which is also the proponent of the Law. As a positive step, the law provides for a proactive approach to publishing information. However, within the statutory deadline, a Central Portal of all information held by state institutions was not established.

The new Appeals Council within the BiH Council of Ministers was appointed in October 2024 for a four-year mandate. The Appeals Council will be responsible for second-instance appeal procedures, not only in relation to FOIA but also to all other laws at the state level and for all state ministries. Legal provisions on access to public information allow applicants whose requests have been denied to seek review of the decision through an appeal to a second-instance authority, a court, or another independent and impartial body. At the state level, the BiH FOIA provides the possibility of appealing to the Appeals Council within the BiH Council of Ministers within 15 days of receipt of the institution's decision.

Journalists believe that there are still significant ambiguities regarding the conduct of legal proceedings in cases where institutions deny access to public information. Differences also exist with regard to sanctions: the state-level FOIA provides for fines for responsible persons, while entity laws do not contain penalty provisions.

Institutions restrict the right of access to information in various ways: improper application of exemptions to disclosure, incorrect application of the public interest test, administrative silence, failure to comply with deadlines for handling requests, and even failure to enforce court decisions. Institutional transparency depends on the willingness of management to make institutional work accessible to the

42 [Annual Report on the Results of Activities of the Institution of the Human Rights Ombudsman of BiH for 2023](#).

43 *Ibid.*, p. 35.

44 Article 6 of the BiH Law on Freedom of Access to Information, Principles of transparency and openness, gender equality, prohibition of discrimination and protection of personal data.

public and on the quality of work of information officers. Research conducted in 2023 shows that only 49.7% of public companies, 79.5% of public institutions in BiH, and 61.2% of local self-governments in the FBiH respond to access-to-information requests within the deadline.⁴⁵

According to FOIA at the state and Federation levels, a decision on a request must be issued within 15 days of a properly submitted request, while the law in the RS provides that the competent authority informs the applicant by a letter.⁴⁶

The Law on the Prosecutor's Office of BiH provides that the Prosecutor's Office informs the public, through the media and other means, about phenomena and problems of general importance observed in its work. The Prosecutor's Office may also inform the public and interested parties about individual cases it is handling.⁴⁷ In 2024, the Prosecutor's Office of BiH decided to respond to journalists' inquiries "only on Fridays after 1 p.m.", which journalists and NGOs see as a step backwards in the transparency process. On the other hand, prosecutors of the Cantonal Prosecutor's Office of Sarajevo Canton emphasise that journalistic inquiries are given priority and that approximately 180–200 such inquiries are received annually. Responses to standard journalistic inquiries are provided significantly faster than to formal access-to-information requests.

The results of a two-year mapping of the level of transparency of judicial institutions⁴⁸ show alarming data: 90% of prosecutor's offices in BiH have no information on criminal cases on their websites, while 50% of courts do not respond to media inquiries at all. The statutory 15-day deadline for resolving requests was violated by 42% of courts and prosecutor's offices. Half of the courts do not publish information on first-instance judgments, and only a small number publish trial schedules. An additional problem is that some judicial institutions do not accept requests by email, insisting instead on personal delivery or postal mail, which complicates and slows down journalists' work.

The Media Action Plan⁴⁹ adopted in February 2023 on the basis of the High Judicial and Prosecutorial Council's (HJPC) 2022–2025 Communication Strategy for courts and prosecutor's offices at all levels⁵⁰ remains in force. One of the main goals of the Strategy is to ensure accurate, verified and up-to-date information on the work of courts and prosecutor's offices that is easily accessible to citizens. The 2024 Judicial Transparency Index prepared by Transparency International BiH (TIBiH) and the Balkan Investigative Reporting Network (BIRN) shows that, although there have been improvements compared to two years earlier, access to information from hearings, as well

45 [Primjena zakona o slobodi pristupa informacijama u BiH](#), Transparency International BiH, 2023.

46 [Annual Report on the Results of Activities of the Institution of the Human Rights Ombudsman of BiH for 2024](#), Institution of the Human Rights Ombudsman of BiH, 2024, p. 40.

47 BiH Law on the Prosecutor's Office, Article 11 (Informing the Public); FBiH Law on the Prosecutor's Office, Article 11; RS Law on Prosecutors' Offices, Article 11; and BD Law on the Prosecutor's Office, Article 35.

48 Ivana Korajlić and Denis Džidić, [Judiciary in BiH Between Citizens' Needs and Politics: Closedness, Inefficiency and Lack of Public Trust](#), BORAM, 2023.

49 [Media Action Plan](#).

50 [Communication Strategy of the High Judicial and Prosecutorial Council of BiH for the period 2022–2025](#).

as the overall openness of courts and prosecutor's offices towards the public and the media, remains largely limited.

Journalists are allowed access to parliamentary sessions at the state, entity and cantonal levels, as well as to the BD Assembly. Sessions are followed live or via online platforms, and some are broadcast on public TV stations. In 2024, a case was recorded in which journalists and media outlets were banned from attending sessions of the Zenica City Council.

B. JOURNALISTS' POSITION IN THE NEWSROOMS

— B.1 THE JOB POSITIONS OF JOURNALISTS ARE STABLE AND PROTECTED AT THE WORKPLACE

Employment relations in the media sector in BiH are not regulated by a specific law, but by general regulations: labour laws, general collective agreements, company by-laws, and individual employment contracts. Labour rights and social protection in BiH are regulated at the entity level and fall under the jurisdiction of the FBiH, the RS, and the BD.

Compared to 2023, there were no significant changes regarding journalists' labour rights. Most journalists have signed employment contracts, but in private media these contracts are mostly fixed-term. This practice is also present in public media, especially when it comes to beginners in journalism or correspondents from smaller towns. In some cases, freelance engagement lasts five years or more.

The general perception is that journalists in BiH are poorly paid. According to data from October 2024, salaries of media workers in 2024 ranged from BAM 819 to BAM 1,847. The lowest incomes are in print media, where more than 50% of journalists earn below-average salaries, while the best situation is in television stations. According to the BiH Agency for Statistics, the net salary in the category 'programme production and broadcasting' amounted to BAM 1,324 in 2024, compared to BAM 1,239 in 2023.⁵¹ At the same time, the average net salary in BiH in December 2024 was BAM 1,430.

One of the most common violations of journalists' labour rights is working without contracts and failure to register journalists. About 75% of journalists are registered in tax records, while 25% are not. However, many journalists – especially young ones – accept such working conditions in order to gain experience and create opportunities for better jobs. Only about 30% of journalists recognise the existence of a collective agreement in the media outlet where they work as a key document for protecting journalists' labour rights.⁵²

In addition to unfavourable contracts, lack of registration and low salaries, unpaid overtime work is a frequent problem. Around 60% of journalists and media workers work overtime without compensation. More than 90% believe that the social status of the profession is extremely poor. This negative perception confirms the poor socio-economic position of journalists and points to the need to strengthen media policies, improve working conditions, and protect professional standards.⁵³

During 2024, the Journalists' Helpline received five (5) new cases related to labour disputes or mobbing – most often concerning violations of rights related to regular income,

51 [Average net salaries for December 2024](#), Agency for Statistics of BiH.

52 Enes Osmančević and Adis Šušnjar, [Istraživanje Integritet novinarstva i transparentnost medija u BiH](#), TI BiH, 2021.

53 Ibid.

overtime work and number of working hours, payment of contributions, severance pay, as well as violations through dismissal or disciplinary procedures. In addition to labour disputes, journalists also reported political pressure and attempts at censorship. In 2024, FMHL recorded 18 cases of political pressure and threats against journalists, while according to the SafeJournalists Network database, out of a total of 28 recorded attacks on journalists, nine contained elements of political pressure and censorship.

One of the greatest weaknesses of the media sector in BiH is the lack of strong trade unions. Unlike most European countries and the region, BiH does not have a unified media workers' union at the state level.⁵⁴ Most private media outlets do not have unions, and where they do exist, they have a small number of members. Employees often believe that unions in private media cannot bring real change and therefore rarely join them.⁵⁵

There are no official data on the number of unions in the media sector, but it is assumed that only 16% of media outlets have a union or an employees' council. Research by Transparency International shows that as many as 77.3% of journalists are not members of a media union, 14.7% are members of a union within their media outlet, and 8% are members of an entity-level union.

— B.2 EDITORIAL INDEPENDENCE IN THE PRIVATE MEDIA

There is no regulation in BiH concerning transparency of media ownership, nor transparency of data on media financing from public funds. There are no publicly available rules or procedures that guarantee protection of editorial independence in private media.

According to research by BH Journalists Association, 56% of media workers claim that there is a clearly defined relationship between journalists and owners in their newsrooms, while 19% state that such a relationship does not exist. According to 51.7% of journalists, this relationship is always respected, while 12.6% believe it is violated. When it comes to the relationship between journalists and editors, 73% state that it exists and is clearly defined, while 15% claim the opposite. A clear relationship with editors is regularly respected for 63.3% of journalists, while 15.9% describe it as impaired. A poor or very poor relationship with superiors was reported by 10.6% of surveyed journalists. Only 12% claim that their newsrooms have clearly defined criteria for career advancement, while 50% believe such criteria do not exist and 30% do not know whether such procedures exist at all.⁵⁶

The basis of self-regulation for print and online media in BiH is the Code of the Press and Online Media Council

54 There are separate trade unions at the entity levels and in the BD. In the FBiH, the Trade Union of Graphic, Publishing and Media Workers of BiH operates, while in the RS there is the Media and Graphic Workers' Union of the RS. Within the public BHRT service, two separate trade unions operate, in addition to the trade unions of the entity public broadcasters. The official number of journalists is unknown, but according to unofficial estimates, around 3,000 journalists work in BiH.

55 [Special Report on the Status and Cases of Threats Against Journalists in BiH](#), Institution of the Human Rights Ombudsman of BiH 2017.

56 [Raspodjela moći u BiH medijima](#), BH Journalists Association 2019.

of BiH, but its implementation is inconsistent.⁵⁷ Internal ethical codes do not exist in most private media. Some newsrooms have introduced 'unwritten rules', for example when reporting on suicide, cases involving minors, or by limiting readers' comments on sensitive content.

Journalism in BiH remains an insecure profession, characterised by low salaries and unstable status. Labour rights are poorly respected, union membership is low, and there are no collective agreements for media workers. As a result, many journalists earn salaries significantly below the average and often work overtime. Women journalists are in an even worse employment position than their male colleagues.⁵⁸

Research shows that the biggest problems faced by journalists in BiH are political pressure, censorship and self-censorship, lack of financial sustainability, shortage of professional staff and weak education of future journalists, underpayment, and insufficient valuation of the profession. Inadequate regulations and non-implementation of existing regulations are also highlighted as significant challenges.⁵⁹

During 2024, the Journalists' Helpline received four cases of labour disputes and mobbing within newsrooms related to inadequate employment contracts, irregular payment of salaries, failure to pay taxes and contributions, workplace mobbing, and unequal treatment of employees of different ages.

— B.3 EDITORIAL INDEPENDENCE IN THE PUBLIC SERVICE MEDIA

The laws and statutes of public broadcasters formally ensure the independence of public RTV services, including editorial independence and institutional autonomy. This particularly refers to determining programme schedules, programme production, editing and presentation of news, management and disposal of assets, employment and employees' rights, internal organisation, preparation and execution of budgets, conclusion of legal acts, representation before judicial institutions, and the purchase, rental and use of goods and services.⁶⁰

Editorial principles of the public RTV system for all three public broadcasters in BiH were adopted as early as 2003, with the signatures of the management of all broadcasters. These principles outline the standards that management, editors and employees should adhere to in order to better understand and fulfil the mission of serving the public. The principles include impartiality, personal opinion, fairness, accuracy, confidentiality of sources, decency and politeness, respect for diversity and independence, etc. However, although the principles prescribe professional standards, they do not guarantee editorial independence from governing bodies.

57 [European Commission Report on Bosnia and Herzegovina for 2023](#).

58 *Ibid.*

59 [Assessment of the Needs of the Media Sector in Bosnia and Herzegovina: Report on Public Opinion Research on the Needs of the Media Sector in BiH](#), OSCE, p. 39.

60 Article 4 of the Law on BHRT (Independence of Public Broadcasters).

BHRT remains the only public broadcaster that has revised its Editorial Principles to include the obligation to moderate content on BHRT's social media accounts, as well as a ban on hate speech and glorification of war crimes on social media by its employees.

Public service broadcasters in BiH face serious problems that threaten their operation. Political influence remains present, and their financial sustainability is increasingly jeopardised.⁶¹ Members of boards of governors are elected in parliaments, and their composition depends on the political situation and relations between ruling parties. A similar situation applies to the appointment of top management in RTV services, with dominant political influence most visible in editorial policy.⁶² Many classify public RTV services as state-controlled media, as the state provides funding, appoints governing bodies, and indirectly influences programming decisions.⁶³

For years, public broadcasters in BiH have faced an unfavourable financial situation and large debts, primarily due to difficulties in collecting the RTV licence fee. The RS Public Broadcaster withdrew from the joint system of collection and distribution of the RTV licence fee in 2017, contrary to the Law on the Public RTV System of BiH. As a result, BHRT is pursuing court proceedings to collect a debt of EUR 31.5 million.⁶⁴ Reliance on state subsidies further undermines editorial independence. The most difficult financial situation is faced by BHRT, which has already been recognised by the EC – stable financing of the public RTV system is listed among the 14 priorities for BiH's EU accession and in the EC 2024 Report.⁶⁵

— B.4 EDITORIAL INDEPENDENCE IN THE NOT-FOR-PROFIT MEDIA SECTOR

There are still no official or precise data on the number of not-for-profit media in BiH. It is assumed that most of them are online portals, while electronic (radio and TV) and print media are the least represented. According to data from the CRA, there are 146 for-profit private and public radio stations in BiH,⁶⁶ three public RTV system broadcasters and two not-for-profit radio stations founded by associations,⁶⁷ as well as 112 TV stations, of which 21 are public services, 89 private and two not-for-profit TV stations.⁶⁸

The CRA also keeps records of violations of programme standards and licence conditions. During 2024, the Agency imposed six enforcement measures for established violations of relevant provisions of applicable rules and codes, as well as several warning measures.⁶⁹

61 [European Commission Report on Bosnia and Herzegovina for 2024, p. 8.](#)
62 [Policy Brief 08 XI-2020](#), School of Political Studies of the Council of Europe in BiH.
63 [The State of State Media](#), CEU Democracy Institute, pp. 14 and 49.
64 [European Commission Report on Bosnia and Herzegovina for 2023.](#)
65 Ibid.
66 CRA, [License holders for terrestrial radio broadcasting.](#)
67 CRA, [License holders for radio broadcasting – non-profit stations.](#)
68 CRA, [License holders for television broadcasting.](#)
69 Communications Regulatory Agency, 2024 Annual Report, p. 26.

Registration and establishment of print and online media are regulated by entity laws and regulations of the BD. The Press and Online Media Council of BiH maintains a public register of print and online media, but it does not contain a precise categorisation of which are not-for-profit. According to the register, there are eight daily newspapers, seven news agencies and 187 periodical publications in BiH.⁷⁰ The online media register lists 63 portals with publisher information and contact details.⁷¹ In total, 615 web portals are registered in BiH,⁷² of which 305 are in the FBiH, 94 in the RS, 11 in the BD, 194 at unknown locations, three in neighbouring countries and seven in the diaspora. Particularly concerning is the fact that 270 portals have no published imprint, 167 do have it, and 178 have it only partially stated.⁷³

In addition to the Code of the Press and Online Media Council, which all professional print and online media are required to follow, some newsrooms apply additional standards. A positive example is CIN, which clearly states that it does not accept financial or other assistance from political parties, politicians or businesspeople, and that it has no political goals other than strengthening civil society.

Since 2004, the BH Journalists Association has had a Code of Honour of BH Journalists Association, which defines principles as well as the rights and duties of journalists and editors who are members of the Association. The Journalists' Council of Honour of BH Journalists Association is responsible for the protection and implementation of the Code.

At the beginning of 2023, the not-for-profit media network Umbrella was established, bringing together 13 independent editorial teams from private media with the aim of strengthening investigative journalism and creating a professional, objective and public-interest-oriented media space free from political, economic and other influences.

In March 2023, the RS Government adopted a Draft Law on a Special Register and Transparency of the Work of Non-Profit Organisations, which faced strong criticism from civil society and international organisations.⁷⁴ The draft law envisaged that not-for-profit organisations receiving foreign funding would have to register as 'foreign agents', with a ban on political activities and an obligation of additional reporting. After being assessed as restrictive and a threat to media freedom – especially for media founded within non-governmental organisations – the Draft Law was withdrawn from the agenda of the RS National Assembly in May 2024 for harmonisation with European legal practice and was not adopted by the end of the year.

Not-for-profit media also face serious security and political pressure. During 2024, several journalists experienced

70 Press and Online Media Council, [List of print media in BiH](#).

71 Press and Online Media Council, [List of online media in BiH](#).

72 Press and Online Media Council, [Web portals in BiH](#).

73 [Mapiranje medijskih internet-portala u BiH](#), Center for the Promotion of Civil Society (CPCD), 2021.

74 [Joint Opinion of the Venice Commission and the OSCE on the Law on Foreign Agents](#).

attacks and threats. Criminal charges were filed against CIN editor Renata Radić Dragić and director Leila Bičakčić on accusations of 'endangering security and obstructing justice'. Franjo Šarčević, editor of the Prometej portal, faced death threats and a lynching campaign on social media. The BiH Minister of Foreign Affairs, Elmedin Konaković, publicly attacked journalist Avdo Avdić and the BH Journalists Association on Facebook, which was assessed as an attempt at professional discreditation and endangering safety.

— B.5 FREEDOM OF JOURNALISTS IN THE NEWS PRODUCTION PROCESS

Journalistic freedom in the choice of topics and content production varies significantly from one media outlet to another. According to available research, most journalists in BiH believe that there are no truly independent media in the country. Two key factors shaping editorial policy are economic and political dependence. Online media are perceived as relatively the most independent, while public media depend on the institutions that founded them, and private media on various political and economic influences. One of the basic criteria for differentiating media in BiH is the source of financing: those relying on donor and project funding are often considered more independent than those receiving funds from state institutions or political structures.⁷⁵

According to research by the BH Journalists Association, the greatest obstacle to media freedom in BiH is political dependence (57.7%), while 32% of respondents point to the general political climate. Views differ by entity: in the RS, the main obstacles are political dependence (52.2%) and financial dependence (37.6%), while in the FBiH political dependence (59.7%) and the general political climate (28.8%) dominate.⁷⁶ The same research shows that 54.3% of citizens at the state level consider media freedom to be 'partially present'. In the RS, 37.6% of respondents believe it is partially present and 30.9% fully present. In the FBiH, 63.8% of citizens assess media freedom as partial, and only 10.7% as fully present.⁷⁷

The absence of by-laws on the protection of employees' rights and safety in most newsrooms further limits journalists. The lack of organisational support is associated with self-censorship, professional dilemmas and withdrawal from sensitive topics. This is particularly pronounced in many public media financed from local budgets.⁷⁸ Journalists state that by accepting a job in a particular media outlet, they also accept its editorial policy, without a real possibility to protect their professional integrity.

An atmosphere of clientelism, constant political conflicts, non-transparent financing, high unemployment and an unregulated advertising market create an environment in

75 [Assessment of the Needs of the Media Sector in Bosnia and Herzegovina](#), OSCE.

76 [Medijske slobode u Bosni i Hercegovini u 2024. godini iz perspektive građana](#), BH Journalists Association, April 2024.

77 Ibid.

78 Zarfa Hrnjić-Kuduzović, [Interni kapaciteti i potrebe medija u oblasti zaštite i sigurnosti novinara i novinarki u BiH s fokusom na novinarke](#), BH Journalists Association, 2023.

which journalists find it difficult to resist pressure and self-censorship. Contributing factors include impunity for attacks on journalists, a large number of defamation lawsuits, pressure from advertisers on critical and investigative journalism, violations of labour rights, and the lack of support programmes for journalists who refuse unethical assignments.⁷⁹ Journalists rarely report censorship and political pressure experienced within newsrooms, believing that doing so can only bring problems at work. Even when they do report such cases, due to fear of losing their jobs, they most often insist on anonymity.

— B.6 WORKING POSITION OF WOMEN JOURNALISTS

Research conducted with women journalists has shown that women, including women journalists, are often perceived in BiH society as the 'weaker sex', which makes them more vulnerable to threats, insults, and a lack of respect in a professional context. Many women journalists testify that their interlocutors do not take them seriously or that, when working in teams with male colleagues, sources tend to address men rather than women. As an example, one journalist stated that when she requested a statement from a municipal mayor and approached him during an assembly session, he told her that he "couldn't give a statement", but that they could "go for a drink" instead.⁸⁰

In contrast to such testimonies, one of the surveys conducted by BH Journalists Association shows that 88.7% of respondents believe that women journalists in their newsrooms are equal to their male colleagues. A smaller share of respondents (9.7%) do not share this opinion. However, 27.4% of media outlets have no activities or policies related to gender equality, while 58.1% of newsrooms have established plans and procedures. In 14.9% of cases, respondents did not know whether such mechanisms existed.

When it comes to planning the protection of women's rights in the media, 37% of newsrooms do not intend to adopt internal regulations on the protection of women journalists, 34% plan to do so, while 29% are not familiar with their newsroom's position on this issue.⁸¹ Around 63% of media outlets do not have rules governing professional advancement – this process depends on age and length of service within a particular media outlet, as well as the personal assessment of editors, which is often not based on the quality of work and competencies. In addition, women journalists believe that their male colleagues advance more easily and that their work is more highly valued. One of the reasons for this lies in deeply rooted patriarchal patterns in BiH society, as well as family obligations (maternity leave, leave due to children's illness, etc.), due to which employers more often promote male journalists.

The distribution of positions of power and decision-making in the media further confirms the unequal position of women.

79 Enes Osmančević and Adis Šušnjar, [Integritet novinarstva i transparentnost medija u BiH](#), TI BiH, 2021.

80 Focus group with women journalists, BH Journalists Association, 20 February 2025.

81 Zarfa Hrnjić-Kuduzović, [Interni kapaciteti i potrebe medija u oblasti zaštite i sigurnosti novinara i novinarki u BiH s fokusom na novinarke](#), BH Journalists Association, 2023.

Women journalists hold about 24% of leading positions in the media, including 25.3% of director-level positions, while men hold 74.7%. The lowest share of women is found in director positions in television companies (15.8%). The highest share is in radio journalism, where women occupy 44.7% of editorial positions, while their share in the online sector is the lowest (21.7%).⁸² In print media, women hold approximately 40% of both editorial and director positions.

In their daily work, women journalists are often exposed to unpleasant situations and harassment, frequently manifested in comments on their appearance, family status, or attempts to discredit them because they are women. Misogynistic outbursts by politicians and public figures are common, particularly in the online space.⁸³ Research shows that one in five women journalists in BiH has experienced gender-based discrimination in the newsroom where she works. In newsrooms where managerial and editorial support exists, positive examples of editorial sensitivity and concrete assistance to women journalists at risk have been identified – ranging from verbal expressions of understanding and solidarity to physical accompaniment and concrete legal assistance.⁸⁴

During 2024, the SafeJournalists network recorded five attacks against women journalists, two of which occurred within newsrooms, representing a lower number compared to previous years. However, the actual number of attacks is likely higher, as many women journalists do not report incidents.

Within the BH Journalists Association, the Network of Women Journalists has been established as a mechanism for the protection and education of women in journalism regarding their rights, empowerment through joint action and strengthening solidarity, as well as raising public awareness about attacks on women journalists and gender-based violence against them. The Network of Women Journalists in BiH operates as a Facebook group and has 300 members.

82 Data from BH Journalists Association.

83 [BH Journalists Association: Women Journalists in Sarajevo Increasingly Victims of Verbal Violence by Politicians](#), 14 April 2022.

84 Zarfa Hrnjić-Kuduzović, [Interni kapaciteti i potrebe medija u oblasti zaštite i sigurnosti novinara i novinarki u BiH s fokusom na novinarke](#), BH Journalists Association, 2023.

C. JOURNALISTS' SAFETY

— C.1 JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES

In BiH, there is still no specific legal mechanism for protecting journalists from violence and hate speech through a dedicated legal framework regulating this issue, although initiatives to introduce special criminal-law protection for journalists in cases of threats and attacks have existed since 2019.

Following the appointment of contact persons for journalists' safety within prosecutor's offices and police structures throughout BiH to cooperate with journalists and journalists' associations, no significant progress was recorded in this area during 2024. Currently, journalists and journalists' associations have access to a total of 18 contact persons in prosecutor's offices and 15 persons in police agencies. However, their role is not to receive complaints or directly act in cases of threats and attacks, but to establish a system for registering and monitoring cases related to threats to journalists' safety, assigning cases to competent prosecutors, acting ex officio, prioritising investigations, and improving communication between institutions, journalists, and journalists' associations.⁸⁵ The Sarajevo Canton Prosecutor's Office, through the prosecutor appointed as a contact point, holds regular meetings (twice a year) with representatives of journalists' associations.

After experiencing an attack or threat, journalists still most often turn to the FMHL, which operates within the BH Journalists Association. In 2024, FMHL recorded 54 cases of attacks on journalists, which is 38% fewer than in 2023, when 87 cases were recorded.

The Institution of the Human Rights Ombudsman of BiH received nine complaints in 2024 related to journalists and the media, including political pressure on media outlets, unequal treatment and denial of access to information, requests for public reactions due to threats to journalists' safety, and complaints from citizens regarding content published on certain portals.⁸⁶ The Institution did not issue any recommendations based on these complaints. In their 2024 Annual Report, the Ombudsmen emphasised the importance of improving the position, safety, and independence of journalists in BiH.⁸⁷

There are cases of effective responses by police and prosecutors in investigating and prosecuting attackers, such as the case of journalist Mirza Dervišević, who was attacked in May 2024, and whose attacker was convicted in December

85 "In the event of an unwanted incident, reporting an attack or threat against women journalists follows an established procedure: it is reported to the nearest police station, the competent police inspector on duty is involved, and the contact point has the obligation to monitor the case and stay in contact with the person, guiding them through the process, because more often than we would like, journalists do not know what their rights are... The obligation of contact points is to assist journalists who find themselves in trouble, but contact points are not spokespersons nor helplines."

86 [Annual Report on the Results of Activities of the Institution of the Human Rights Ombudsman of BiH for 2024](#), Institution of the Human Rights Ombudsman of BiH, 2024, p. 78.

87 *Ibid.*, p. 78.

of that year. Nevertheless, such positive examples are more the exception than the rule. According to data from the BH Journalists Association, the procedure from the moment of the attack and reporting it to the adoption of a prosecutorial decision takes, on average, about two and a half years, meaning that prosecutorial action cannot be considered efficient. Among the fastest-processed cases are those treated as misdemeanour proceedings under laws regulating public order and peace, where perpetrators of attacks on journalists are fined between BAM 100 and BAM 500.

In 2024, FMHL recorded five cases of discontinued investigations or decisions not to initiate investigative actions related to reported attacks and threats against journalists, with the explanation that there were no elements of a criminal offense – this being the most common reason for discontinuing investigations.

– C.2 JOURNALISTS AND OTHER MEDIA ACTORS (WHOSE LIVES OR PHYSICAL INTEGRITY ARE AT REAL AND IMMEDIATE RISK) HAVE ACCESS TO SPECIAL PROTECTION OR SAFETY MECHANISMS

Journalists receive police protection in cases where competent institutions – police and prosecutors – assess it as necessary. In December 2024, as part of an international investigation, it was revealed that Dino Muzaferović, suspected of multiple murders and other criminal offenses, had planned the murder of Avdo Avdić, journalist and editor of the Istraga.ba portal. Muzaferović was arrested in Slovenia, and journalist Avdić immediately received police protection.

Laws on internal affairs prescribe that police protection is granted in cases where a threatened person reports threats, after which members of the Ministry of the Interior inform the competent prosecutor's office, which then decides on police measures and actions to protect the life of the threatened person.

Journalists who feel threatened can receive free legal aid through the FMHL, and upon request, the BH Journalists Association also provides psychological support. According to BH Journalists Association records, in 2024, 15 media outlets and 72 individuals used free legal aid, representation, and support in protecting their rights and freedoms before judicial and state institutions at various levels of government. Journalists and media outlets in BiH also have access to the Media Freedom Rapid Response (MFRR) platform, where they can obtain practical assistance in situations where their safety is threatened.

— C.3 FEMALE JOURNALISTS HAVE ACCESS TO LEGAL MEASURES AND SUPPORT MECHANISMS WHEN FACED WITH GENDER-BASED THREATS, HARASSMENT AND VIOLENCE

According to the GREVIO Report⁸⁸ from September 2022 on legislative and other measures for implementing the provisions of the Istanbul Convention in BiH,⁸⁹ certain but insufficient progress has been made in harmonising the BiH legal framework with the Istanbul Convention. At the entity level, new criminal offenses have been introduced, including domestic violence, female genital mutilation, forced sterilisation, stalking, sexual harassment, and forced marriage. However, in judicial practice and in the conduct of prosecutors and judges, two key laws that could provide more effective protection for women, including women journalists – the Gender Equality Law and the Law on Prohibition of Discrimination – are not sufficiently applied.⁹⁰

At the entity level and in the BD, laws on protection from domestic violence exist and protect victims of violence only if committed by a spouse or partner. Victims of other forms of gender-based violence, however, do not have the right to protection in terms of access to safe houses, psychosocial support, SOS hotlines, and similar services. Strategies and laws almost exclusively address victims of domestic violence and do not provide specific measures for other forms of violence against women.⁹¹

Sexual harassment in BiH is prohibited by a set of anti-discrimination laws at the state level and applicable entity labour legislation. Research shows that women are often victims of gender-based harassment at work, with women journalists among the more vulnerable groups. According to SafeJournalists network data, during 2024, two cases of threats and attacks against women journalists individually and two cases within groups were recorded – none of these cases contained explicit elements of gender-based violence but can be described as political pressure and hate speech. The Coalition for Women in Journalism (CFWIJ) recorded two cases of threats to the safety of women journalists in BiH in 2024.

A large number of attacks on women journalists remain unrecorded because women journalists do not want to 'waste time' on the time-consuming process of giving statements to police agencies (which also exposes them to additional victimisation, as police and judicial institutions often fail to recognise elements of gender-based violence and threats, considering them an acceptable part of the journalistic profession and local 'tradition'), do not want to be perceived as victims, and do not believe that cases will

88 GREVIO is a body of independent experts of the Council of Europe whose mandate includes monitoring the implementation of the Istanbul Convention in member states (evaluation procedure), initiating inquiries into specific circumstances in a state party (inquiry procedure), and issuing general recommendations related to the Istanbul Convention.

89 [GREVIO Committee Report](#), Baseline Evaluation for BiH, 2022.

90 Conclusions of the discussion held on 4 December 2023 in Sarajevo on the topic of the safety of women journalists in media outlets, with a focus on developing internal security procedures and rules to support women journalists and all other women in the media. [Novinarke u BiH su marginalizovane i nedovoljno zaštićene](#) – BH Journalists Association, 4 December 2023.

91 Interview with experts of the BiH Gender Equality Agency, 19 December 2024.

be resolved in their favour. Another problem is the frequent lack of support from editors and media owners and their lack of interest in improving the safety of women journalists.⁹²

Regarding support for women journalists, the BH Journalists Association provides free legal aid and, when necessary, psychological support to women journalists exposed to violence. In addition, the association Vaša prava offers a programme of free legal aid to journalists.

— C.4 PRACTICE OF REGULAR PUBLIC CONDEMNATION OF THREATS AND ATTACKS ON JOURNALISTS AND MEDIA HAS BEEN ESTABLISHED

There is no regular practice of condemning attacks against journalists and other media professionals within state institutions or political parties. Sporadic condemnations of attacks are often politically motivated, especially if the attacked journalist comes from a media outlet close to a particular political party.

Out of the total number of reported cases of attacks, threats, and pressure in 2024, 12 were committed by politicians and public officials, while one woman journalist experienced a direct threat and another as part of a group. This represents a decrease compared to 2023, when out of 46 reported cases of attacks, 21 were committed by politicians and public officials, and women journalists were victims of attacks and threats by politicians in nine cases. To date, no politician has been sanctioned for verbal attacks, insults, and pressure on journalists and the media, confirming a culture of impunity and partly enabling such attacks. The only case of suspension from duty remains that of a high-ranking police officer of the FBiH Police Administration, Zoran Čegar, who threatened a CIN journalist; criminal proceedings against him are still ongoing.

Support from civil society in condemning attacks on journalists is also lacking, as it does not show sufficient solidarity. According to respondents in the BH Journalists Association 2024 media freedom survey, the main reasons why attacks on journalists are not punished are: fear among prosecutors and judges of sanctioning politicians and others who threaten journalists (39.1%); the fact that powerful individuals stand behind these attacks and threats and police do not investigate them (30.6%); difficulties in proving who is behind such attacks (11.8%); and mild penalties for perpetrators, which leads to repetition of offenses (9.9%). Analysing differences by entity shows similar trends, with the first two reasons predominating, while others vary somewhat.⁹³

The vast majority of BiH citizens do not approve of any form of violence against journalists – 87.4% of respondents – while 12.6% believe that “in some cases attacks on journalists are justified”. In the RS, more than a quarter of respondents approve of violence against journalists (26.4%), a significantly lower

92 Conclusions from online focus groups with women journalists held on 19 and 20 February 2025.

93 [Medijske slobode u BiH u 2024. godini iz perspektive građana](#), BH Journalists Association, 2024.

percentage than in 2023 (74.1%), but still a worrying figure. In the FBiH, 5.2% of respondents approve of violence.⁹⁴

The Media Freedom Rapid Response (MFRR) report published in January 2024⁹⁵ states that open hostility and harsh rhetoric by politicians towards journalists and media workers clearly send a message to the public that journalists are “legitimate targets of violence” and “scapegoats”.⁹⁶ While the RS President Milorad Dodik led in 2023, in 2024 the politician most frequently associated with attacks on journalists was Elmedin Konaković, BiH Minister of Foreign Affairs and president of the political party People and Justice (*Narod i pravda* - NiP).

Other politicians and public officials who expressed verbal and other threats against journalists and media workers during 2024 include: Srebrenica Mayor Mladen Grujičić; Šipovo Mayor Milan Kovač (who had previously threatened journalists); Fadil Novalić, former Prime Minister of the FBiH; Adnan Delić, Minister in the FBiH Government; Zenica Mayor Fuad Kasumović; and the Chief Imam of the Brčko Majlis of the Islamic Community, Mustafa ef. Gabeljić.

— C.5 POLICE AUTHORITIES ARE SENSITIVE TO JOURNALISTS’ PROTECTION ISSUE

Although police and judicial officials are generally familiar with human rights standards and the role of journalists, in practice they lack sufficient sensitivity to issues of journalists’ and women journalists’ safety. They are also insufficiently familiar with the specifics of the journalistic profession, working conditions, and the challenges journalists and media workers face daily.

In April 2024, the HJPC published on its website the document Guidelines for Heads of Police Agencies – Job Description for Contact Persons for Journalists’ Safety in Police Agencies,⁹⁷ which defines the duties of contact persons working to improve the efficiency of handling cases related to the media and media workers. With the establishment of contact points in prosecutors’ offices and police agencies, enhanced training and education of police and prosecutorial representatives are expected.

Updated OSCE guidelines for media workers in cooperation with the police,⁹⁸ as well as guidelines for police in their work with journalists,⁹⁹ are also in force. In 2024, cooperation between journalists’ associations and police agencies was successful in terms of information exchange and interventions at the request of associations.¹⁰⁰

94 Ibid.

95 [Media Freedom in Survival Mode](#), Media Freedom Rapid Response.

96 [Bosnia and Herzegovina: Media Freedom in Survival Mode](#), Free Press Unlimited.

97 Guidelines for Heads of Police Agencies, High Judicial and Prosecutorial Council of BiH.

98 Guidelines for cooperation between Police and Media, OSCE Mission to BiH.

99 Guidelines for cooperation between Police and Media, OSCE Mission to BiH.

100 Borka Rudić, Secretary General of BH Journalists Association, interview, 22 August 2024.

— C.6 SPECIALISED UNITS/OFFICERS ARE EQUIPPED WITH EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

Compared to previous years, progress has been made in investigating attacks and threats against journalists through the appointment of contact points in prosecutors' offices and police agencies, as well as in collecting, recording, and exchanging information on attacks with journalists' associations. In 2024, the Guidelines for Chief Prosecutors – Job Description for Contact Persons for Journalists' Safety were published, instructing chief prosecutors to ensure support for contact persons, including participation in training sessions, conferences, and professional workshops relevant to improving and enhancing the protection of journalists and media workers in BiH.

Through the project Protecting Freedom of Expression and of the Media in Bosnia and Herzegovina – PROFREX–BiH, implemented by the CoE's Division for Cooperation on Freedom of Expression, several training sessions for contact persons for journalists' safety in prosecutors' offices and police administrations were held during 2024. These trainings focused on strengthening the knowledge of prosecutors and police officers in European standards and the domestic legislative framework for protecting freedom of expression and journalists' safety, in order to address previously identified shortcomings in investigations of cases involving violence and threats against journalists, particularly online.

Investigations and prosecution of cybercrime in BiH are primarily handled by the Cybercrime Department within the Federation Police Administration and the High-Tech Crime Unit within the RS Ministry of the Interior. While some capacities exist at the local level, they are insufficient to combat sophisticated forms of cybercrime.¹⁰¹ In Sarajevo Canton, a prosecutor trained specifically for hacking attacks has been appointed, and within police structures at the entity level there are trained inspectors with direct contacts with social media platforms who can request the blocking of profiles used to express threats and spread hate speech or the removal of clearly dangerous content.¹⁰²

The prosecution of attacks against journalists still largely depends on the sensitivity and level of training of individuals in prosecutors' offices and police departments assigned to investigate cases. It often happens that prosecutors assess attacks on journalists as lacking the elements of a criminal offense, leading to dismissal of complaints or decisions to discontinue investigations due to lack of evidence.

101 Available at: <https://cybersecurity.ba/cyber-kriminal-u-bosni-i-hercegovini/>

102 Borka Rudić, Secretary General of BH Journalists Association, interview, 22 August 2024.

— C.7 INVESTIGATIONS OF SERIOUS PHYSICAL ATTACKS ON JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT EFFICIENTLY (INDEPENDENTLY, THOROUGHLY AND PROMPTLY)

Within the media community, there are doubts about the independence of investigations into attacks against journalists, especially when high-ranking politicians or public officials are involved.

Nevertheless, the BH Journalists Association assesses the efforts of judicial institutions to sanction violence against journalists and media organisations as positive examples. In early 2024, Mirza Dervišević, editor and journalist of the Times.ba portal, was attacked in a café in Brčko, sustaining minor injuries and receiving death threats. The BD Police reacted quickly, arrested the attacker, and ordered detention measures. The competent prosecutor's office initiated an investigation and undertook measures to punish the attacker. In December 2024, the suspect, Bojan Radovanović, was sentenced to 45 days in prison. The BD judiciary also acted efficiently in another case of threats against this journalist: in November 2024, the Basic Court of BD issued a first-instance verdict against Bogdan Stevanović, sentencing him to a suspended prison sentence of 30 days for threatening journalist Dervišević online.

In 2024, the Sarajevo Canton Prosecutor's Office received a total of nine cases related to violence against journalists. In three cases, decisions were made not to initiate investigations, while in the remaining six cases, actions are being taken to establish all circumstances of the reported violence.¹⁰³

The BH Journalists Association established the Media Justice Group (MJG), composed of ten professionals,¹⁰⁴ with the aim of acting efficiently in cases of attacks and threats against journalists, as well as strengthening the openness of judicial institutions towards the media and citizens, particularly in cases of public interest.

BiH criminal legislation still does not contain specific provisions relating to attacks on journalists, although initiatives to introduce such criminal offenses have existed since 2019.¹⁰⁵ The FBiH Parliament, as well as both chambers of the BiH Parliamentary Assembly, adopted an initiative to recognise journalists as persons performing work of public interest within criminal legislation, thereby requiring special criminal-law protection. This initiative has not yet been accepted or translated into legal provisions.

The majority of attacks on journalists and media outlets continue to be processed under laws regulating public order

103 Response to an inquiry on registered cases of violence against journalists, Darko Martinčević, contact point at the Cantonal Prosecutor's Office of Sarajevo Canton, 1 April 2025.

104 [Members of the Media Justice Group \(MJG\)](#) were appointed in 2024. The MJG consists of 10 members, including four judicial officials, a representative of the BiH HJPC, four journalists who in their work focus on judiciary-related topics, and a representative of the self-regulatory body, the Press and Online Media Council of BiH. The intention of MJG members is also to jointly work on educating journalists and judicial office holders in order to improve the quality of work of both professional communities.

105 Nedim Pobrić, [Istrage i procesuiranje napada na novinare i medijske radnike u Bosni i Hercegovini](#), BH Journalists Association.

and peace, which prescribe low – mostly monetary – penalties. While this accelerates investigations and verdicts against attackers, it minimises the significance of attacks on journalists as persons performing work of public interest. Uneven legal regulation within BiH further contributes to legal uncertainty in protecting journalists, as threats to life and physical safety are interpreted at different levels as either criminal offenses or misdemeanours against public order and peace.¹⁰⁶ Additionally, fines for the same offense are defined differently across laws on public order and peace, contributing to inequality before misdemeanour courts. While BD and Sarajevo Canton prescribe only monetary fines,¹⁰⁷ the RS allows for prison sentences of up to 30 days.¹⁰⁸ At the same time, in the RS, threats to safety are also treated as a criminal offense.¹⁰⁹

In criminal proceedings, the most frequently prosecuted offenses include endangering security, minor bodily injury, and incitement of national, racial, or religious hatred, discord, and intolerance. The prosecution of attacks against journalists still largely depends on the sensitivity and training of prosecutors and police officers handling investigations. Complaints are often dismissed or investigations discontinued due to assessments that attacks lack the elements of a criminal offense.

— C.8 JOURNALISTS AND OTHER MEDIA ACTORS ARE EFFICIENTLY PROTECTED FROM VARIOUS FORMS OF ONLINE HARASSMENT

The prosecution of online threats and harassment via the internet, email, and social media is not uniformly or consistently regulated in BiH. In the FBiH, this issue is not clearly defined, while the RS CC stipulates the use of computers and social networks to commit the criminal offense of “public incitement and instigation to violence and hatred”.¹¹⁰ A similar provision was introduced into the BD CC through amendments in 2024.¹¹¹

In the absence of clearly defined regulations for prosecuting online threats, violence, and harassment of journalists and media workers, such incidents are processed under other criminal offenses whose essential elements they contain – primarily “endangering security”, i.e., threats to life and bodily integrity,¹¹² and “incitement of national, racial, or religious hatred, discord, and intolerance”, which can also

106 In the BD and Sarajevo Canton, endangering security is regulated by laws on public order and peace, while in the RS it is defined by the CC, Article 150, as well as by Article 11 of the [RS Law on Public Order and Peace](#).

107 BD Law on Public Order and Peace, Article 7 (Endangering Security and Causing a Sense of Threat) – Anyone who endangers security or causes a sense of threat to another person by threatening an attack on their life or body shall be punished by a fine ranging from BAM 500 to BAM 1,500. Law on Offences against Public Order and Peace of Sarajevo Canton, Article 8 (Offences and fines for natural persons), paragraph (3): A fine ranging from BAM 300 to BAM 900 shall be imposed on anyone who endangers security or causes a sense of threat to another person by threatening an attack on their life or body.

108 RS Law on Public Order and Peace, Endangering Security by Threatening an Attack on Life, Body or Property, Article 11 – Anyone who endangers security or causes a sense of threat to another person by threatening an attack on their life, body or property, or the life, body or property of a person close to them, shall be punished by a fine ranging from BAM 300 to BAM 900 or imprisonment of up to 30 days.

109 RS CC, Endangering Security, Article 150(1) – Anyone who endangers the security of another person by a serious threat to deprive them or a person close to them of life, to cause serious bodily injury, to deprive them of liberty or abduct them, or to cause harm by arson, explosion or another generally dangerous act or means, shall be punished by a fine or imprisonment of up to two years.

110 Public Incitement and Instigation to Violence and Hatred, Article 359 of the RS CC (1) – Anyone who, through the press, radio, television, computer system or social network, at a public gathering or public place or otherwise, publicly calls for, incites or instigates, or makes available to the public leaflets, images or other materials calling for violence or hatred directed against a person or groups on the basis of their national, racial, religious or ethnic affiliation, skin colour, sex, sexual orientation, disability, gender identity, origin or other characteristics, shall be punished by a fine or imprisonment of up to three years.

111 [Law on Amendments to the Criminal Code of the Brčko District of BiH](#).

112 Endangering Security: Article 150 of the RS CC; Article 183 of the FBiH CC; Article 180 of the BD CC.

be committed online.¹¹³ Other criminal offenses that can be committed online may also be used to protect journalists and media workers, such as “stalking”, “unauthorised publication and display of another person’s writing, portrait, or recording”, “sextortion”, and similar offenses.

During 2024, the FMHL recorded five cases of online attacks against journalists, most involving threats and hate speech via social media, as well as orchestrated online campaigns.

In March 2024, Franjo Šarčević, a journalist for the Prometej.ba portal, was the target of an online campaign after publishing an opinion piece on the marking of March 1, Independence Day of BiH, and commenting on a photograph posted on social media by then-Mayor of Sarajevo, Benjamina Karić, featuring a boy in a military uniform. Šarčević criticised the use of a child for personal promotion, after which he was subjected to a barrage of online insults, death threats, and harassment. The BiH Ministry for Human Rights and Refugees became involved in the case. Šarčević had been experiencing attacks and threats since 2017, and shortly after this most recent incident, he decided to leave BiH with his family.

In April 2024, the Prosecutor’s Office of BiH indicted Jasmin Mulahusić, a BiH citizen living in Luxembourg, for online violence and spreading ethnic and religious hatred via social media. Mulahusić was charged with violence against nine persons, most of whom were journalists. The trial has not yet begun.

— C.9 INVESTIGATIONS OF ALL TYPES OF ATTACKS AND VIOLENCE AGAINST JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT TRANSPARENTLY

Compared to previous years, access to investigative procedures improved in 2024 due to the appointment of contact points in prosecutors’ offices and police services. These contact points enable journalists and media organisations to access information on the status of investigations. In mid-April 2024, the Sarajevo Canton Prosecutor’s Office established a Working Group for Journalists’ Safety, composed of representatives of journalists’ associations, media organisations, police, and prosecutors. The aim of the Working Group is to develop internal regulations to improve journalists’ safety and the efficiency of investigations into attacks against media workers. The Group meets twice a year to enhance cooperation and ensure regular information exchange.

Nevertheless, journalists continue to point out that access to court files is difficult and slow, and that prosecutorial practice regarding the publication of indictments is inconsistent.¹¹⁴ Media representatives often state that neither journalists nor the general public have easy access to filed and confirmed

113 This criminal offence exists in the criminal codes of BiH, the FBiH and the BD. The RS CC contains the criminal offence of “public incitement and instigation to violence and hatred”, which is more broadly defined. Sanctions are prescribed for those who spread hatred or call for violence against a person or groups on the basis of their national, racial, religious or ethnic affiliation, as well as other characteristics such as sex, sexual orientation, disability, gender identity, etc.

114 [Experiences and Perceptions of Journalists on the Transparency of the Judiciary in Bosnia and Herzegovina](#), BH Journalists Association, 2022.

indictments.¹¹⁵ According to the Law on the Prosecutor's Office of BiH, the Prosecutor's Office may inform the public through the media about phenomena and issues of general interest observed in its work, and may also inform the public and interested parties about individual cases.¹¹⁶

The HJPC's 2022–2025 Communication Strategy for courts and prosecutors' offices at all levels, together with the Media Action Plan, envisages that courts and prosecutors ensure accurate, verified, and up-to-date information accessible to citizens. Among other objectives, the Strategy aims to improve communication between judicial institutions and the legislative and executive branches, the media, the public, and users of the judicial system. However, the Strategy is not legally binding and does not have specifically allocated funds for its implementation.

— C.10 QUALITY STATISTICS COLLECTION SYSTEMS ESTABLISHED BY STATE AUTHORITIES TO STEM IMPUNITY

Official statistical data of state authorities on attacks against journalists and media workers still do not exist. Although some progress has been made through the creation of databases within prosecutors' offices and police agencies, the shortcoming remains that no institution consolidates these data or publishes them.

The Guidelines for Chief Prosecutors, adopted in 2024, require chief prosecutors to ensure the keeping of special records on the number and type of cases related to attacks against journalists. The Guidelines 'advise' prosecutors' offices to implement the 2023 recommendation of the HJPC on recording cases related to journalists in the CMS system, using the labels 'journalist' and/or 'media worker'.¹¹⁷

At present, the most consistent records of attacks are kept by the BH Journalists Association through the Journalists' Helpline and the SafeJournalists database. Both platforms contain detailed records of reported attacks, threats, and pressures against journalists. Due to the absence of official state data, both domestic and international institutions (EU, U.S. State Department, Reporters Without Borders, and others) mostly rely on data collected by BH Journalists Association in their reports.

A problem in creating a comprehensive database of attacks against journalists is the inconsistent practice of prosecutors' offices in sharing information about such attacks. Some prosecutors' offices provide more detailed responses, including the name of the prosecutor handling the case, as well as information about the victim and the perpetrator, and the status of the case. However, there are no official state data

115 Jesenka Rešidović, [Transparentnost pravosuđa: pitanje dostupnosti optužnica i odluka iz krivičnih postupaka](#), BIRN BiH.

116 Law on the Prosecutor's Office of BiH, Article 11 (Informing the Public); Law on the Prosecutor's Office of the FBiH, Article 11; Law on Prosecutors' Offices of the RS, Article 11; and Law on the Prosecutor's Office of the BD, Article 35.

117 Records of CMS (Court Case Management System) and TCMS (Prosecutorial Case Management System).

disaggregated by gender, ethnicity, or other socio-demographic criteria when it comes to attacks against journalists.

— C.11 NON-PHYSICAL THREATS AND HARASSMENTS

In 2024, a total of 28 cases of attacks against journalists, media outlets, and media workers were recorded in the SafeJournalists database, of which 10 cases involved harassment and threats not directly aimed at the life or bodily integrity of journalists. In nine cases of attacks, two involved groups of two journalists (in one case two women journalists, and in another a female and a male journalist). Although these were not life-threatening attacks, such incidents – encompassing insults, discrediting, swearing, verbal threats, refusal to respond to journalistic inquiries, political and economic pressure, or aggressive communication by politicians and persons in positions of power – are extremely disturbing for the performance of journalistic work.

It is positive that the number of such threats and pressures against journalists significantly decreased compared to 2023, when 31 cases of non-physical threats and harassment were recorded. Unlike in 2023, there were no repeated attacks against the same journalist. In most cases, the perpetrators were persons holding public office – from mayors and leading figures in religious communities to representatives of certain state agencies and institutions. These cases mostly end with reports to journalists' associations and their public reactions.

Category	Number	Brief description of cases
<p>Non-physical threats and harassment</p> <p>This may include:</p> <ul style="list-style-type: none"> – surveillance or monitoring; – harassment by telephone; – arbitrary judicial or administrative harassment; – aggressive statements by public officials; – other forms of pressure that jeopardise journalists' safety in the performance of their work. <p>These types of threats do not include workplace mobbing or harassment.</p>	10	<ul style="list-style-type: none"> – FTV journalist Suada Mujdanović was attacked by the chief imam of the Islamic Community Brčko Majlis, Mustafa ef. Gabeljić, after she published a thematic report on believers' dissatisfaction with the increase in annual membership fees. – The mayor of Srebrenica, Mladen Grujičić, threatened retired journalist Marinko Sekulić by phone, swore at him, threatened that he would "remember him" and continued harassing him for several hours by sending inappropriate insults. – Against Osman Mehanović, a cameraman from Bratunac, the District Prosecutor's Office in Bijeljina filed a criminal complaint on suspicion that he had committed the criminal offence of "bodily injury" in June 2023. This complaint followed after Mehanović's lawyer submitted a disciplinary complaint against a prosecutor from Bijeljina who had failed to complete the investigation into the physical attack on the cameraman from June 2023. – The mayor of Šipovo and prominent SNSD member Milan Kovač threatened journalist Bojana Ninković and Siniša Vukelić, editor of the Capital portal from Banja Luka. The threats were made by telephone after journalist Ninković requested a comment from the mayor regarding the operations of his private company and its receipt of public budget funds. – SIPA contacted journalist Avdo Avdić, editor of the Istraga portal, by phone in an attempt to learn the identities of his sources regarding cases under investigation by the Prosecutor's Office of BiH. – Nedjeljko Bosiočić, editor of the Drina Media portal, faced death threats after publishing a letter by a young man who had been a victim of a physical attack and hospitalised in Zvornik. Following the publication, the police arrested and detained the attackers, among whom was a police officer from Serbia. – Sanja Vasković, journalist and editor of the Spin Info portal, was summoned to the East Ilidža police station as a suspect for the criminal offence of defamation, based on the provisions of the RS CC. – BH Journalists Association and the legal team of the FMHL supported journalist Vladimir Kovačević in filing an application with the ECtHR in Strasbourg to protect his reputation and right to freedom of expression. – Criminal charges were filed against responsible persons of CIN – editor Renata Radić Dragić and director Leila Bičakčić – accusing them of having "endangered security, obstructed a fair trial, and prevented the collection of evidence" during court proceedings against attorney Emina Begić from Bugojno. – Fadil Novalić, former Prime Minister of the FBiH, verbally attacked journalists from CIN and FTV over articles about the Court of BiH verdict imposing prison sentences in the 'Respiratori' case including Novalić. Following the publications, the former Prime Minister launched a political campaign against FTV journalist Haris Šetović and CIN journalists.

– C.12 THREATS AGAINST THE LIVES AND PHYSICAL SAFETY OF JOURNALISTS

In 2024, out of a total of 28 registered cases of attacks against journalists, four cases involved threats to the life and physical safety of journalists. All cases concerned male journalists, and one journalist experienced two threats during 2024.

The number of direct threats was somewhat lower than indirect ones, but all threats were very serious and called for endangering journalists' safety, including calls for killing. Indirect threats were most often issued via social media from anonymous profiles, as well as by politicians from their personal profiles.

Category	Number	Brief description of cases
<p>Threats to the life and physical safety of journalists</p> <p>This may include:</p> <ul style="list-style-type: none"> – calls for the killing of journalists, their friends, family members, or sources; – calls for physical attacks against journalists, their friends, family members, or sources. <p>Threats may be:</p> <ul style="list-style-type: none"> – direct or conveyed through third parties; – sent electronically or through direct communication; – implicit or explicit. 	4	<ul style="list-style-type: none"> – Journalist Fatmir Alispahić was attacked in Tuzla when two young men blocked his path with a car, shouting “Run him over!” Alispahić reported the case to the police, who, according to his claims, attempted to cover it up despite valid evidence. – Franjo Šarčević, editor and owner of the Prometej portal, was exposed to hate speech, death threats, and threats of ‘removal’ from the Faculty of Natural Sciences and Mathematics in Sarajevo, where he is employed. The threats followed the publication of an editorial comment on the manner in which the Mayor of Sarajevo, Benjamina Karić, marked Independence Day of BiH and the misuse of children for political purposes. – BiH Minister of Foreign Affairs, Elmedin Konaković, published on his Facebook profile a video with edited excerpts from interviews given by journalist Avdo Avdić, with the aim of discrediting him professionally and personally and portraying him as a person unworthy of respect. Along with the video, Minister Konaković wrote: “There is no stopping now, this story must go to the end!” which may imply actions posing security risks to the journalist. – Journalist Avdo Avdić was assigned 24/7 police protection after security agencies received information that his liquidation was being prepared. Information about planned violence against Avdić was collected during the arrest of Dino Muzaferović in Slovenia, who is suspected of multiple murders and other criminal offences.

– C.13 ACTUAL ATTACKS

Two cases of actual attacks against journalists and media workers were recorded, which is half the number compared to 2023. Journalists were attacked directly, outside newsrooms, by unknown attackers. Cases of destruction of journalists’ property were also recorded, specifically private vehicles. All cases were reported to the competent authorities; some attackers were identified and detained, and in all cases the BH Journalists Association responded with public statements. Journalists believe that the main motive for most attacks were the articles they were working on.

Category	Number	Brief description of cases
<p>Actual attacks</p> <p>This may include actual physical or psychological injury, kidnapping, invasion of home/office, seizure of equipment, arbitrary detention, attempted murder, etc.</p>	2	<ul style="list-style-type: none"> – Mirza Dervišević from Brčko was physically attacked in a café in Brčko. He sustained minor injuries, and the attacker threatened him with death. The BD police reacted promptly, arrested the attacker, and ordered 24-hour detention. – Senadin Voloder, journalist of the magazine Stav, was attacked and kidnapped near the BiH–Montenegro border. A person from the Montenegrin criminal milieu forcibly entered his car. After several minutes of driving, accompanied by insults and death threats, the journalist was ordered to exit the vehicle, which was later found burned.

– C.14 THREATS AND ATTACKS ON MEDIA OUTLETS AND JOURNALISTS’ ASSOCIATIONS

In 2024, twelve attacks and threats directed at media outlets and organisations were recorded, five cases more than in the previous year. Ten media outlets were affected, with some being targeted multiple times.

During the year, attacks by politicians and persons in positions of power against media in BiH intensified, involving political pressure and professional discrediting of journalists. Numerous attempts to interfere in editorial policies and impose content were also recorded. BiH Minister of Foreign

Affairs and president of the People and Justice party (NiP), Elmedin Konaković, repeatedly publicly attacked media outlets, both at press conferences and via his Facebook profile.

In addition, there were attempts to adopt new laws, such as the Law on Information of the Una-Sana Canton.

Category	Number	Brief description of cases
<p>Threats and attacks against media and journalists' associations</p> <p>Threats may include harassment by telephone, arbitrary judicial or administrative harassment, aggressive statements by public officials, and other forms of pressure (articles, threatening messages, etc.). Actual attacks include invasion of offices, seizure or destruction of equipment, damage to vehicles, etc.</p>	12	<ul style="list-style-type: none"> - At a press conference in Sarajevo, BiH Minister of Foreign Affairs and NiP party president, Elmedin Konaković, attacked BHRT and RTV FBiH, questioning their independence and promising that the financial problems of the two broadcasters would be resolved once the ruling majority appoints "its own management" in these media. - A minister in the FBiH Government, Adnan Delić, filed a criminal complaint with the Cantonal Prosecutor's Office in Sarajevo, requesting an investigation into who provided journalists of Hayat TV and the portals Slobodna Bosna and Istraga.ba with documents for articles about an attempted unlawful and non-transparent allocation of BAM 728,000 in budget funds. - The Rector of the University of Zenica, Jusuf Duraković, sent a letter to the management of BHRT, RTV FBiH, and Klix, protesting that journalists had not covered an event at the University and, without any arguments, accusing them of "sabotaging" the work of the institution – assessed as pressure on the media and an attempt to interfere in editorial policy. - After the portal Slobodna Bosna published an analytical article about the RS President Milorad Dodik and his political views on Srebrenica and the crime of genocide, the media outlet received a threatening message from an unknown person calling them a "spittoon of the Serbian and Croatian people" and stating that the "editorial office would end up where it should". - Elmedin Konaković, BiH Minister of Foreign Affairs, verbally attacked and targeted journalists and media at a press conference in Sarajevo, calling them "part of a media-judicial mafia". - BHRT, the state public broadcaster, decided on 8 May 2024 to stop broadcasting RTV FBiH programming, except for news, justifying the decision by the unlawful retention of funds collected from the RTV fee on the account of the Federation public broadcaster. The decision was met with unified public condemnation. - Following the attack on journalist Avdo Avdić, Minister Konaković used his Facebook profile to attack the BH Journalists Association with the aim of professional discreditation and endangering their safety. - The Mayor of Zenica, Fuad Kasumović, announced that he would ban access to public information and events to several local media and request city administration and public companies to cease all communication with the Zenica Blog portal and Radio Zenit, justifying the decision by "unprofessional and biased reporting during the election campaign". - Our Party (Naša stranka - NS), a member of the ruling coalition at the Canton Sarajevo and BiH levels, sent a letter to several Sarajevo media outlets with instructions on reporting about a criminal investigation against Bojan Bošnjak, a minister in the Canton Sarajevo Government, which was assessed as political pressure and impermissible interference in journalistic work. - The Government and the Ministry of Education, Science, Culture and Sport of the Una-Sana Canton initiated preparation of a new Law on Information to regulate the media space of the canton and limit hate speech, fake news, and other harmful content spread via new media and social networks. The draft law was assessed as harmful to freedom of expression and journalists' right to work freely. - The Bljesak portal from Mostar submitted a request for legal assistance and monitoring of proceedings in a SLAPP filed against the outlet by Rade Bošnjak, former director of the Health Insurance Institute of the Herzegovina-Neretva Canton and an HDZ BiH member. - SIPA summoned the management of Hayat TV with the aim of taking statements and determining how they obtained information related to cases under investigation by the Prosecutor's Office of BiH.



Conclusions and Recommendations

CONCLUSIONS

A. LEGAL SAFEGUARDS AND THEIR IMPLEMENTATION

Although the right to freedom of expression and information in BiH is guaranteed by all constitutions and aligned with international standards, significant difficulties in its implementation persist in practice. In 2024, the consequences of numerous legislative initiatives from 2023 became evident, particularly the amended RS CC, which introduced new criminal offences against honour and reputation, including defamation and the disclosure of personal and family circumstances. Although announced, by the end of 2024 the RS had not adopted a Media Law, nor had the CC been amended to define attacks against journalists as a criminal offence. Likewise, a law on transparency of media ownership – long announced as a key regulation – has still not been adopted.

During 2024, a new composition of the Council of the CRA was confirmed, after the previous council's mandate expired in 2017. A public call was also launched for the appointment of a new Director General of the CRA. However, despite formal independence, the CRA still lacks full political and financial independence, and the procedure for appointing its leadership does not guarantee pluralistic representation of stakeholders nor full independence from political influence.

Public service broadcasters in BiH formally enjoy editorial independence, but legal norms do not ensure substantive autonomy. Political influence and increasing dependence on budgetary funding further undermine their independence. The announced reform of the public RTV system of BiH was not implemented by the end of 2024. Public broadcasters have for years been in a difficult financial situation, burdened by significant mutual debts – particularly due to problems with the collection of RTV fees – which substantially hampers their work.

Financing of media content from public funds remains non-transparent and without clear criteria, enabling numerous abuses. BiH still lacks a state-level advertising law, and state advertising remains opaque and subject to political influence, threatening market fairness and media integrity.

Although the confidentiality of journalistic sources is guaranteed by defamation laws and criminal procedure laws at all levels of government, journalists increasingly feel insecurity and pressure to reveal their sources. The unclear role of security institutions and lack of transparency in their work further undermine trust in systemic protection of journalists from attacks and open space for potentially unlawful political and institutional interference in media work. In 2024, SIPA contacted the editorial office of one media outlet and an individual journalist with the aim of discovering how certain information was obtained and identifying sources.

In 2024, there were no changes regarding trade union organising and association of journalists – journalists in BiH remain free to organise professionally and join associations and unions without direct pressure or legal obstacles. However, cases of obstruction of journalists' work by public officials were recorded. Following the adoption of a new Law on Freedom of Access to Information in state institutions in 2023, a new Appeals Council within the BiH Council of Ministers was appointed in 2024. Nevertheless, institutions continue to restrict access to information in various ways, further hindering journalists' access to information of public interest.

B. JOURNALISTS' POSITION IN THE NEWSROOMS

Journalists in BiH continue to face unstable working conditions, low wages, frequent violations of labour rights, and poor social status. Employment relations in the media sector are not regulated by a specific law but by general regulations, leaving room for abuse. The majority of journalists work without adequate legal protection, often overtime and without contracts, while political pressure and censorship further worsen their position. One of the greatest weaknesses of the media sector in BiH is the lack of strong trade unions. Although ownership and editorial structures are formally separated in private media, owners often exert pressure on newsrooms, resulting in censorship and self-censorship. On the other hand, public broadcasters have formally guaranteed editorial independence, but this does not ensure full independence from governing bodies. Political influence over public broadcasters persists, and together with increasingly fragile financial sustainability, their work is seriously endangered – particularly in the case of BHRT.

As for non-profit media, most lack long-term secured funding and increasingly face serious security and political pressures. During 2024, several journalists from non-profit media experienced attacks and threats. Journalistic freedom in news production varies from outlet to outlet, with economic and political dependence being two key factors shaping editorial policy. Most journalists believe that genuine editorial independence exists only in online media.

At the same time, the majority of journalists in BiH believe that the position of women journalists is more difficult than that of their male colleagues. In addition to all the challenges faced by journalists in general, women journalists are additionally exposed to gender-based violence and sexism. They face verbal attacks and threats both in the field and within their newsrooms. These attacks are often gender-based and relate to appearance, marital status, or sex rather than professional work. The distribution of positions within media organisations further confirms the unequal position of women.

C. JOURNALISTS' SAFETY

In 2024, a total of 28 security-related attacks and threats against journalists were recorded: 10 cases of harassment and threats not directly aimed at life or bodily integrity, 4 cases of threats to life and physical safety, 2 cases of actual attacks against journalists and media workers, and 12 attacks and threats directed at media outlets and organisations. Compared to 2023, when 49 cases were registered, a decrease was recorded.

Although BiH lacks a specific legal framework for the protection of journalists, certain progress has been achieved through the establishment of contact points for journalists' safety within prosecutor's offices and police agencies. Their tasks include improved coordination and monitoring of cases, prioritised investigations, ex officio action, and record-keeping. In 2024, this system was further improved through better communication between contact points and journalists' associations. However, the period from the moment of attack and reporting to a prosecutorial decision still lasts on average about two and a half years, meaning real effectiveness of police and prosecutorial action cannot yet be claimed. While police officers show basic awareness of the role of journalists and the media, in practice there remains a lack of sensitivity to the specific security risks journalists face – especially women journalists.

Women journalists in BiH are particularly exposed to gender-based violence, threats, and harassment. The lack of a protective legislative framework and insufficient effectiveness of institutional protection mechanisms often lead to secondary victimisation. Due to these factors and distrust in the system, women journalists frequently choose not to report violence and threats.

There is no regular practice of condemning attacks on journalists and other media professionals within state institutions or political parties. Although politicians are often direct perpetrators of verbal attacks and pressure, no politician has been sanctioned to date for verbal attacks, insults, or pressure on journalists and media, reinforcing a culture of impunity. Support from civil society in condemning attacks is also lacking, contributing to the normalisation of violence against journalists. Online threats against journalists are increasing, while legal protection remains uneven and institutional responses slow and ineffective. The prosecution of online threats and harassment via the internet, email, and social

networks is not consistently regulated across BiH. Although mechanisms exist within current laws, criminal complaints are often dismissed and only a small number of cases result in convictions. Despite the existence of contact points, journalists face difficulties accessing information about attack cases, and transparency of investigations remains limited.

RECOMMENDATIONS

- Adopt amendments to the BiH Criminal Code to treat attacks against journalists as a specific criminal offence, ensure effective prosecution of perpetrators, and impose stricter sanctions.
- Harmonise, amend, and improve media legislation in line with the European Media Freedom Act and EU accession requirements, with active participation of journalists and the media community.
- Adopt a Law on Transparency of Media Ownership and Media Pluralism.
- Adopt an Advertising Law defining key criteria for media advertising in line with EU standards and ensuring transparent financing of media from public budgets at all levels.
- Establish a functional state-level mechanism for recording, monitoring, and publicly reporting on SLAPPs, involving representatives of the media community and civil society.
- Improve criminal legislation to sanction hate speech, online violence, and threats.
- Ensure editorial independence of public broadcasters at state, entity, and local levels, as well as full independence of regulatory bodies.
- Reform governance and appointment systems in public media to ensure depolarisation through transparent processes and broad public consultations.
- Through advocacy, statements, and social media campaigns, insist on consistent application of existing laws, particularly regarding depolarisation of public broadcasters.
- Require authorities to proactively publish information on media financing, including subsidies and advertising.
- Strengthen the capacity of labour inspections and courts to process and sanction violations of journalists' labour rights and raise awareness of the importance of trade union organising.
- Work towards establishing a unified journalists' trade union.

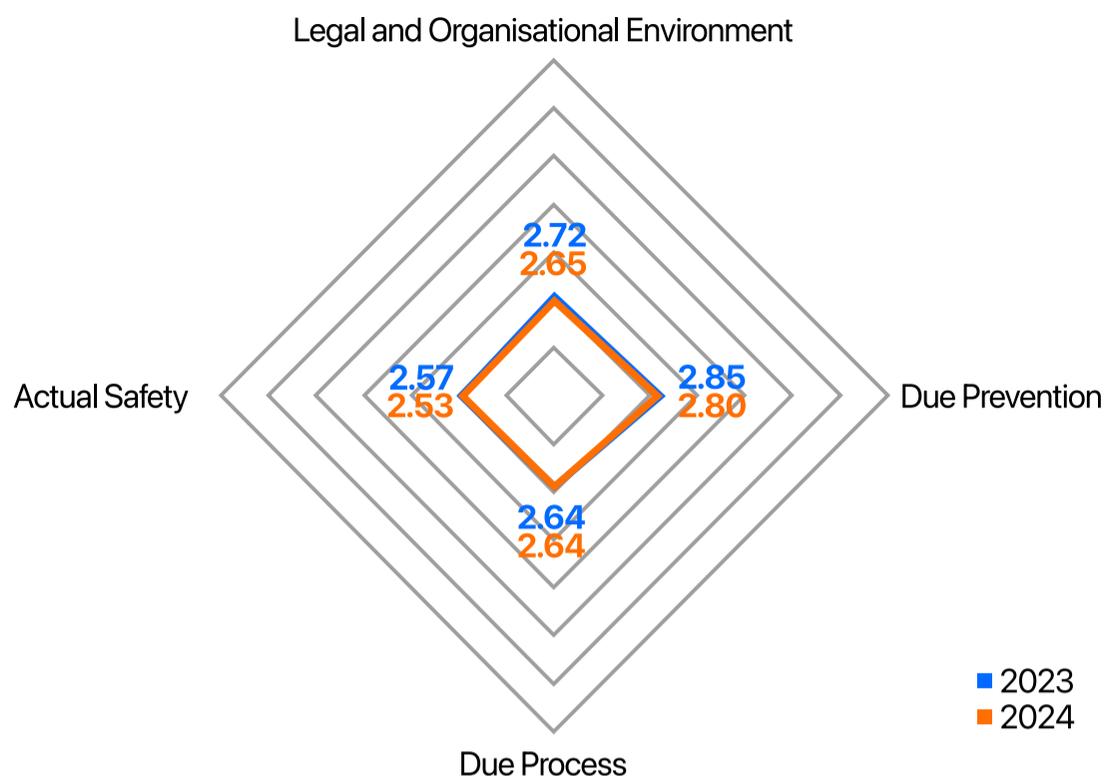
- Adopt specific protocols guaranteeing newsroom independence from management and marketing departments, as well as security protocols for attacks on journalists and editors.
- Strengthen investigative bodies and courts to improve investigations and sanctioning of threats and attacks against journalists.
- Increase involvement of judicial and police representatives in journalists' association activities to improve mutual understanding of rights and obligations.
- Introduce mandatory gender equality and gender-based violence protection rules in all media, with continuous education and support mechanisms for women journalists.
- Improve existing legal and institutional mechanisms for protecting women journalists from gender-based violence, including training for police and judiciary.
- Raise awareness among women journalists about risks and the importance of reporting threats and attacks.
- Introduce mandatory training for police officers on journalists' protection and role in society, strengthening police independence from political influence.

IV

Journalists' Safety Index, Bosnia and Herzegovina – 2024

This section of the report graphically presents the Journalists' Safety Index in 2024, compared to the previous year 2023. For each of the four dimensions and for all 19 indicators, a brief explanation of the key changes that occurred in 2024 is presented. A broader explanation of the data and the changes that occurred for each individual indicator of the Index can be read in the narrative section of the report – Chapter II, Media Freedom and Journalists' Safety in Bosnia and Herzegovina – Indicators.

Indicators of Journalists Safety Index	Narrative report
I Legal and Organisational Environment	
Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	A.6
Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities	A.8
Other laws are enforced objectively and allow journalists and other media actors to work freely and safely	A.7
Journalists are free to pursue their profession and to establish, join and participate in their associations	A.9
Job positions of journalists are stable and protected at the workplace	B.1
II Due Prevention	
Journalists and media actors have access to immediate and effective protective measures	C.1
Journalists and other media actors (whose lives or physical integrity are at real and immediate risk) have access to special protection or safety mechanisms	C.2
Female journalists have access to legal measures and support mechanisms when faced with gender-based threats, harassment or violence	C.3
Practice of regular public condemnation of threats and attacks on journalists and media has been established	C.4
Police authorities are sensitive to journalists' protection issue	C.5
III Due Process	
Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists	C.6
Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)	C.7
Journalists and other media actors are efficiently protected from various forms of online harassment	C.8
Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently	C.9
Quality statistics collection systems established by state authorities to stem impunity	C.10
IV. Actual Safety	
Non-physical threats and harassments	C.11
Threats against the lives and physical safety of journalists	C.12
Actual attacks	C.13
Threats and attacks on media outlets and journalists' associations	C.14



	2023	2024		Key developments in each dimension
Legal and Organisational Environment	2.72	2.65	↓	In 2024, the consequences of legislative amendments adopted in 2023 became evident. This primarily refers to the re-criminalisation of defamation in the RS and the introduction of new criminal offences against honour and reputation, which have become a tool for silencing journalists. This led to an increase in criminal complaints as well as SLAPPs, which journalists perceive as a form of pressure. BiH has no mechanisms to protect against SLAPPs, nor does it keep official records of them. The confidentiality of journalistic sources is legally protected but attempts to undermine it have been recorded. Journalists are free to associate, although attempts to obstruct their work have been noted. Journalists' employment status remains unstable, characterised by precarious contracts, unpaid overtime, undeclared work and weak trade-union protection, alongside political pressure and censorship.
Due Prevention	2.85	2.80	↓	In 2024, the Guidelines for Chief Prosecutors – Job Description for Contact Persons for Journalists' Safety and the Guidelines for Heads of Police Agencies – Job Description for Contact Persons for Journalists' Safety in Police Agencies were adopted, defining the duties of contact persons in prosecutors' offices and police agencies tasked with improving the efficiency of handling cases involving media and media workers. As a result, cooperation between the police and journalists' associations improved in terms of communication and information exchange. However, investigations remain lengthy and often end with decisions not to initiate investigations into security threats and attacks against journalists and media workers. Special protection mechanisms for journalists in immediate danger do not exist. There has been no progress regarding the protection of women journalists exposed to gender-based violence in the field and in newsrooms, amid weak institutional responses and limited support from media employers. Institutions generally do not condemn attacks against journalists, and when they do, condemnations are often politically motivated and selective. Unlike in 2023, one case of police protection being granted to an attacked journalist was recorded in 2024.
Due Process	2.64	2.64	—	Despite limited progress in journalist protection through the establishment of a network of contact points in prosecutors' offices and the police, investigations into attacks against journalists remain slow, rarely thorough, and often fail to identify the background or instigators, particularly when public officials are involved. Specialised units for investigating attacks exist only in certain cantons and are not systematically implemented nationwide. Online threats against journalists, particularly women journalists, are increasing but are still not processed consistently, with most criminal complaints being dismissed. The legal framework for online violence remains fragmented across BiH, allowing for divergent interpretations. State authorities have yet to establish a reliable system for collecting statistical data and therefore largely rely on records kept by non-governmental organisations.

	2023	2024		Key developments in each dimension
Actual Safety	2.57	2.53	↓	In 2024, the overall safety situation of journalists and media workers did not deteriorate compared to the previous year. A total of 28 security-related attacks against journalists and media were recorded, most of them (12) targeting media outlets and journalists' associations. This was followed by threats and harassment not related to physical safety, with 10 recorded cases. Additionally, four cases of threats to life and physical safety of journalists and two cases of actual attacks were recorded. Physical violence against journalists decreased compared to the previous year, while the number of threats against media outlets and journalists' associations increased. Verbal attacks and aggressive rhetoric by public officials are also on the rise.
Journalists' Safety Index	2.65	2.61	↓	

Legal and Organisational Environment

Legal provisions related to defamation and their implementation do not produce chilling effects on journalists and media

1.76

Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities

2.72

Other laws are implemented objectively and allow the journalists and other media actors to work freely and safely

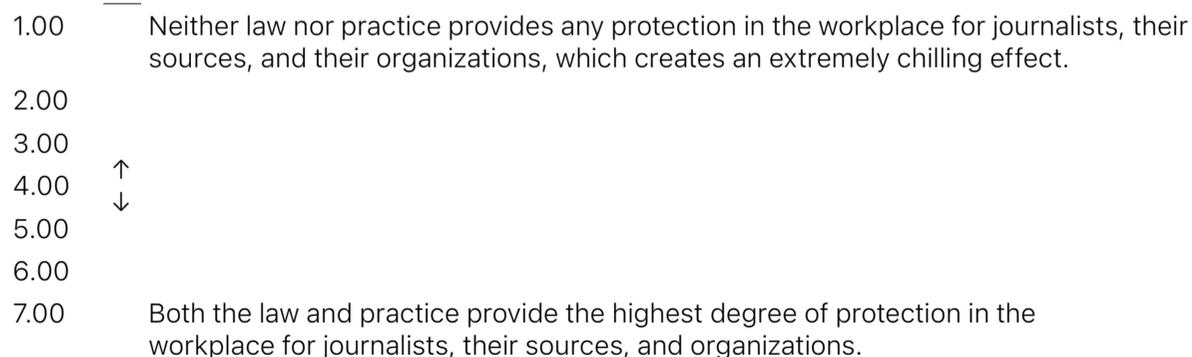
1.96

Journalists are free to pursue their profession and to establish, join and participate in their associations

3.97

Journalists' job position is stable and protected at the workplace

2.85



INDICATOR 1.1

— LEGAL PROVISIONS RELATED TO DEFAMATION AND THEIR APPLICATION DO NOT CREATE A CHILLING EFFECT ON JOURNALISTS AND THE MEDIA

Score 2023: 1.83 / Score 2024: 1.76

A major decline in media freedoms across BiH in 2024 resulted from the re-criminalisation of defamation in the RS, which introduced defamation as a specific criminal offence, including fines and criminal prosecution of media and journalists. This had a negative impact on critical and investigative journalism and on editorial decisions to cover issues of crime, corruption and misuse of public resources. By the end of 2024, nearly 200 criminal complaints had been filed, including 38 against journalists, editors and media owners. According to available information, one indictment and one verdict (concerning non-media actors) were issued in Banja Luka, indicating cautious and thorough handling by the RS prosecutors when assessing criminal complaints and the potential criminalisation of freedom of expression. In 2024, the BH Journalists Association and the FMHL registered 17 new defamation cases, mostly initiated by politicians and businesspeople linked to politics. FMHL lawyers are representing media outlets and journalists in 21 cases before courts in BiH and the ECtHR in Strasbourg related to defamation and violations of the right to freedom of expression.

INDICATOR 1.2

— THE CONFIDENTIALITY OF JOURNALISTS' SOURCES IS GUARANTEED IN THE LEGISLATION AND RESPECTED BY THE AUTHORITIES

Score 2023: 2.89 / Score 2024: 2.72

The confidentiality of journalistic sources is guaranteed by law at all levels of government in BiH through defamation laws and criminal procedure laws. Nevertheless, pressure on media outlets to reveal their sources has been recorded. CPCs provide that journalists cannot be questioned as witnesses for the purpose of protecting information sources, while defamation laws stipulate journalists' right not to disclose the identity of sources. This right also includes non-disclosure of any document or fact that could reveal a source's identity, including oral, written, audio, visual or electronic material. However, in 2024 SIPA twice attempted to determine how media outlets obtained certain information. Acting on an order from the Prosecutor's Office of BiH, in June they contacted TV Hayat and journalist Avdo Avdić. Avdić was questioned at SIPA premises as a witness following an anonymous report related to the publication of a document on the visit of Danilo Vučić, son of the President of Serbia, to Banja Luka in January 2024.

INDICATOR 1.3

— OTHER LAWS ARE ENFORCED OBJECTIVELY AND ALLOW JOURNALISTS AND OTHER MEDIA ACTORS TO WORK FREELY AND SAFELY

Score 2023: 2.06 / Score 2024: 1.96

The consequences of the criminalisation of defamation in the RS and the introduction of criminal penalties for publishing personal and family matters in the media and in public, along with other legislative changes, contributed to the 'silencing' of journalists. In the Una-Sana Canton, an attempt was recorded to adopt a Law on Information containing provisions that would, through the actions of the inspectorate of the Ministry of Education, Science, Culture and Sports, restrict the dissemination of hate speech, false news and other harmful content via new media and social networks. Following reactions by the BH Journalists Association and the international community, work on this law was temporarily suspended. BiH has no mechanisms for protection against SLAPPs and keeps no official records of them. The announced BH Journalists Association's working group for recording, monitoring and reporting on SLAPPs has not yet been established. In the FBiH, a draft Law on Citizen Initiative containing anti-SLAPP provisions was adopted in June, but no further progress followed. During 2024, the BH Journalists Association recorded 14 new SLAPPs.

INDICATOR 1.4

— JOURNALISTS ARE FREE TO PURSUIT THEIR PROFESSION AND TO ESTABLISH, JOIN AND PARTICIPATE IN THEIR ASSOCIATIONS

Score 2023: 3.97 / Score 2024: 3.97

There was no progress in 2024 regarding journalists' association and trade-union organising. Journalists are free to join trade unions and professional associations, and most are members of journalists' associations, while a smaller number are members of media workers' unions within public broadcasters. Journalists in BiH do not require state-issued work permits or licences, and no attempts to introduce licensing were recorded in 2024. Journalists are required to have appropriate press credentials to cover the work of public institutions and authorities. No pressure was recorded in 2024 from authorities, media owners or persons in positions of power to force journalists to join specific associations, although cases of obstruction of journalists' work by public officials were recorded. In Zenica, the mayor announced restrictions on access to information and events for certain local media outlets, while attendance at City Council sessions was allowed only to RTV Zenica.

INDICATOR 1.5

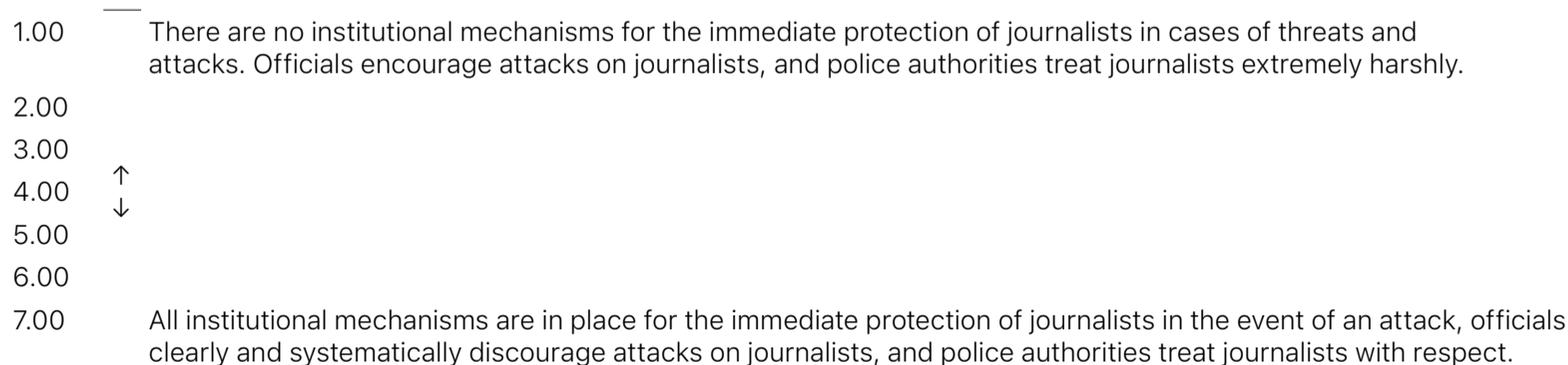
— **THE JOB POSITIONS OF JOURNALISTS ARE STABLE AND PROTECTED AT THE WORKPLACE**

Score 2023: 2.85 / Score 2024: 2.85

Working conditions and the economic position of journalists in BiH did not improve in 2024. The prevailing view is that journalists are poorly paid. One of the most common violations of journalists' labour rights is working without contracts and failure to register journalists for social security. Approximately 75% of journalists are registered in tax records, while 25% are not. Many journalists, especially young ones, accept work without contracts in order to gain experience and improve future job prospects. Unpaid overtime is also common. Unlike many European countries and countries in the region, BiH lacks a single, nationwide media/journalists' union that could advocate for better labour and social conditions. Additionally, journalists continue to report political pressure and attempts at censorship. Although the number of such cases decreased compared to 2023, it still indicates continued exposure. In 2024, out of 28 recorded attacks against journalists, nine involved elements of political pressure and attempts at censorship.



Due Prevention



INDICATOR 2.1

— JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES

Score for 2023: 2.82 / Score for 2024: 2.85

During 2024, there was no significant progress in journalists' and media workers' access to direct and effective protective measures in cases of threats, attacks, and other forms of violations of rights and safety. The establishment of contact points within prosecutors' offices and police agencies improved the system for registering and monitoring these cases, including priority investigations and ex officio action, and above all enhanced communication between institutions, journalists, and their associations.

The Sarajevo Canton Prosecutor's Office and the BD BiH Prosecutor's Office stand out in terms of the number of complaints received and indictments filed that were resolved in court proceedings in favour of journalists. By the end of 2024, these two prosecutor's offices registered 35 complaints of violence against journalists, filed 7 indictments, and 3 cases resulted in convictions of the perpetrators. The Sarajevo Canton Prosecutor's Office also holds meetings twice a year with representatives of journalists' associations to exchange information and improve cooperation.

Institutions in BiH still do not have a comprehensive and publicly available database on the number and status of reported cases of attacks and threats against journalists. After experiencing an attack or threat, journalists still most often turn to the FMHL, which operates within the BH Journalists Association and provides journalists with legal, psychological, and medical support. In 2024, FMHL recorded 54 cases of violations of journalists' rights and threats to media freedoms, which is 38% fewer than in 2023. FMHL also recorded 5 cases of discontinued investigations during 2024.

At the same time, the regional SafeJournalists platform registered 28 cases of threats to freedom of expression and journalists' safety in BiH, significantly fewer than the 46 cases recorded in 2023.

INDICATOR 2.2

— JOURNALISTS AND OTHER MEDIA ACTORS HAVE ACCESS TO SPECIAL PROTECTION OR SAFETY MECHANISMS

Score for 2023: 2.90 / Score for 2024: 2.92

Laws on internal affairs stipulate that police protection is granted in cases where an endangered person reports threats, after which members of the Ministry of Interior inform the competent prosecutor's office, which then decides on police measures and actions to protect the life of the endangered person. Journalists receive police protection in cases where competent institutions – police and prosecutors – assess it as necessary.

In December 2024, as part of an international investigation into drug trafficking, murders, and other criminal offenses, it was revealed that Dino Muzaferović, suspected of multiple murders and criminal acts in Slovenia, had planned the murder of journalist Avdo Avdić, editor of the Istraga.ba portal, who had repeatedly written about his criminal organisation. Muzaferović was arrested in Slovenia, and journalist Avdić immediately received police protection. This case represents a positive example of effective police action and international cooperation between police agencies, resulting in special 24/7 physical protection measures for journalist Avdo Avdić.

INDICATOR 2.3

— FEMALE JOURNALISTS HAVE ACCESS TO LEGAL MEASURES AND SUPPORT MECHANISMS

Score for 2023: 2.67 / Score for 2024: 2.52

No significant progress in the protection of women journalists was achieved in 2024. Women journalists are exposed to threats and violence, both in the field and in newsrooms. In judicial practice and in the conduct of prosecutors and judges, two key laws that could provide more effective protection for women (including women journalists) in BiH – the Law on Gender Equality and the Law on Prohibition of Discrimination – are still insufficiently applied.

At the entity level and in the BD, laws on protection from domestic violence exist and protect victims only if the violence is committed by a spouse or partner. As a result, victims of other forms of gender-based violence are not entitled to protection in the form of safe house services, psychosocial support, SOS hotlines, and similar assistance. In December 2024, the FBiH Government adopted a new Draft Law on Protection from Domestic Violence and Violence against Women in the FBiH, which protects all women regardless of their profession.

Women journalists in BiH are reluctant to speak about cases of gender-based violence and do not always decide to report it due to distrust in the system and/or lack of knowledge about existing mechanisms, making it impossible to determine the exact number of cases of gender-based harassment and violence. During 2024, two cases of threats and attacks against individual women journalists and two cases within a group were recorded. None of these cases contained explicit elements of gender-based violence; rather, they were motivated by political pressure and hate speech. FMHL lawyers represent women journalists in two cases before the court in Banja Luka related to insults and gender-based discrimination of which women journalists are the victims.

INDICATOR 2.4

— THE PRACTICE OF REGULAR PUBLIC CONDEMNATION OF THREATS AND ATTACKS ON JOURNALISTS AND MEDIA

Score for 2023: 2.67 / Score for 2024: 2.50

As institutions have still not established a regular practice of condemning attacks against journalists and other media professionals, there have been no positive changes compared to 2023. When condemnations do occur, they are very often politically motivated, especially if the attacked journalist comes from a media outlet close to a particular political party.

In 2024, 12 attacks were committed by politicians and public officials, while one woman journalist experienced a direct threat and another as part of a group. This represents a decrease compared to 2023, when out of a total of 46 reported attacks, 21 were committed by politicians and public officials, and women journalists were victims of attacks and threats by politicians in 9 cases. To date, no politician has been sanctioned for verbal attacks, insults, or pressure against journalists and the media.

Furthermore, public condemnations of attacks against journalists lack sufficient support from civil society, which does not show adequate solidarity in such cases. According to a BH Journalists Association's survey on media freedoms in BiH in 2024, a large majority of BiH citizens do not approve of any form of violence against journalists (87.4% of respondents); however, 12.6% believe that "in some cases, attacks against journalists are justified". In the RS, more than a quarter of respondents still approve of violence against journalists (26.4%), which is significantly lower than in 2023 (74.1%). In the FBiH, 5.2% of respondents approve of violence.

INDICATOR 2.5

— POLICE AUTHORITIES ARE SENSITIVE TO JOURNALISTS' PROTECTION ISSUE

Score for 2023: 3.19 / Score for 2024: 3.22

Representatives of the judiciary and police at the operational level are not sufficiently familiar with the journalistic profession, working conditions, or the difficulties journalists and media workers face daily. The appointment of 33 contact points within prosecutors' offices and police structures for journalists' safety in BiH represents an important step forward in this area.

In 2024, the Guidelines for Chief Prosecutors – Job Description for Contact Persons for Journalists' Safety and the Guidelines for Heads of Police Agencies – Job Description for Contact Persons for Journalists' Safety in Police Agencies were adopted, defining the duties of persons responsible for improving the efficiency of handling cases related to the media and media workers.

Thanks to these developments, cooperation between contact points and journalists' associations has improved in terms of communication and information exchange; however, investigations remain lengthy and often end with decisions not to initiate investigations into security threats and attacks against journalists.



Due Process

Specialised investigation units and/or officers are equipped with relevant expertise for investigating attacks and violence against journalists

2.84

Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)

2.67

Journalists and other media actors are efficiently protected from various forms of online harassment

2.26

Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently

2.93

Quality statistics collection systems established by state authorities to stem impunity

2.51

1.00

Institutions neither investigate nor sanction attacks on journalists, including online harassment, threats to the life and physical safety of journalists, and physical attacks on journalists and the media.

2.00

3.00

4.00



5.00

6.00

7.00

Institutions are fully efficient and transparent in investigating and sanctioning attacks on journalists, including via the internet, threats to the life and physical safety of journalists, and physical attacks on journalists and the media.

INDICATOR 3.1

— SPECIALISED UNITS/OFFICERS ARE EQUIPPED WITH EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

Score for 2023: 2.83 / Score for 2024: 2.84

During 2024, two specialised trainings were held for contact persons for journalists' safety in prosecutors' offices and police administrations. Through the first training, prosecutors and police officers appointed as contact points expanded their knowledge of European standards and the domestic legislative framework related to the investigation of cases of violence and threats against journalists. The second training for contact points was organised with the aim of strengthening capacities for efficient and transparent investigations of reported threats against journalists, particularly in the online sphere. Both trainings were conducted within the framework of the CoE Project on protecting freedom of expression and of the media.

However, the prosecution of attacks against journalists still largely depends on the sensitivity and level of training of the individuals in prosecutors' offices and police administrations to whom the cases are assigned. Journalists remain dissatisfied with the speed and efficiency of investigations. Laws have still not been amended to provide additional protection for the journalistic profession within criminal legislation, despite the fact that in 2022 both chambers of the BiH Parliamentary Assembly adopted an initiative to amend criminal legislation in order to ensure more effective protection of journalists and media workers, and tasked the Council of Ministers with proposing amendments to the CC at the state level. More than two years into their mandate, the newly elected members of the BiH Council of Ministers have not considered this initiative nor proposed other measures for the more effective protection of journalists.

INDICATOR 3.2

— INVESTIGATIONS OF SERIOUS PHYSICAL ATTACKS ON JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT EFFICIENTLY

Score for 2023: 2.69 / Score for 2024: 2.67

Since journalists do not have a specially defined legal status, it was only with the appointment of contact points that cases involving threats and attacks began to receive priority over other investigations. However, in practice investigations continue to proceed slowly, and journalists remain dissatisfied with the efficiency of the competent institutions. Nevertheless, there are positive examples of institutional responses.

In January 2024, journalist Mirza Dervišević was attacked in Brčko, sustaining minor injuries, while the attacker threatened him with death. The BD Police reacted promptly, arrested the attacker, and ordered 24-hour detention. The case was then assigned to the competent prosecutor, and in December 2024 the suspect was sentenced to a single prison term of 45 days.

However, the majority of attacks against journalists continue to be processed under laws on public order and peace, which predict mild, predominantly financial penalties. Such legal qualifications allow for faster proceedings but diminish the gravity of attacks against journalists as socially dangerous acts against persons performing work of public interest.

INDICATOR 3.3

— JOURNALISTS AND OTHER MEDIA ACTORS ARE EFFICIENTLY PROTECTED FROM VARIOUS FORMS OF ONLINE HARASSMENT

Score for 2023: 2.26 / Score for 2024: 2.26

The prosecution of online threats and harassment via the internet, email, and social media remains inconsistent and insufficiently regulated in BiH, and such cases are therefore prosecuted under other criminal offenses whose constituent elements they contain. Because competent institutions do not respond effectively to cases of online harassment and threats against journalists, the majority of criminal complaints related to these offenses are dismissed.

In May 2024, the Minister of Foreign Affairs, Elmedin Konaković, published manipulated content on his Facebook profile targeting journalist Avdo Avdić of the Istraga.ba portal, calling his safety into question; however, this case was not prosecuted. In April 2024, the BiH Prosecutor's Office filed an indictment against Jasmin Mulahusić, a BiH citizen residing in Luxembourg. The indictment covers several criminal offenses, including hate speech and the dissemination of ethnic and religious hatred via social media, against nine individuals, among whom were several journalists. In May 2024, the Court of BiH confirmed the indictment, but Mulahusić failed to appear for the plea hearing in October 2024, and no new hearing has been scheduled since.

INDICATOR 3.4

— INVESTIGATIONS OF ALL TYPES OF ATTACKS AND VIOLENCE AGAINST JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT TRANSPARENTLY

Score for 2023: 2.91 / Score for 2024: 2.93

Unlike previous years, since 2024 access to investigative procedures has improved thanks to the appointment of contact points in prosecutors' offices and police agencies. In mid-April 2024, the Sarajevo Canton Prosecutor's Office established a Working Group on Journalists' Safety, composed of representatives of journalists' associations, media organisations, police, and prosecutors from Sarajevo. The aim of the Working Group is to develop an internal rulebook to improve journalists' safety and the efficiency of investigations into attacks against journalists and media workers in this canton. The Working Group holds regular meetings twice a year to enhance cooperation and information exchange.

Journalists still consider the process of obtaining court files to be difficult and slow and note that prosecutorial practices regarding the publication of indictments remain inconsistent.

INDICATOR 3.5

— **QUALITY STATISTICS COLLECTION SYSTEMS
ESTABLISHED BY STATE AUTHORITIES TO STEM
IMPUNITY**

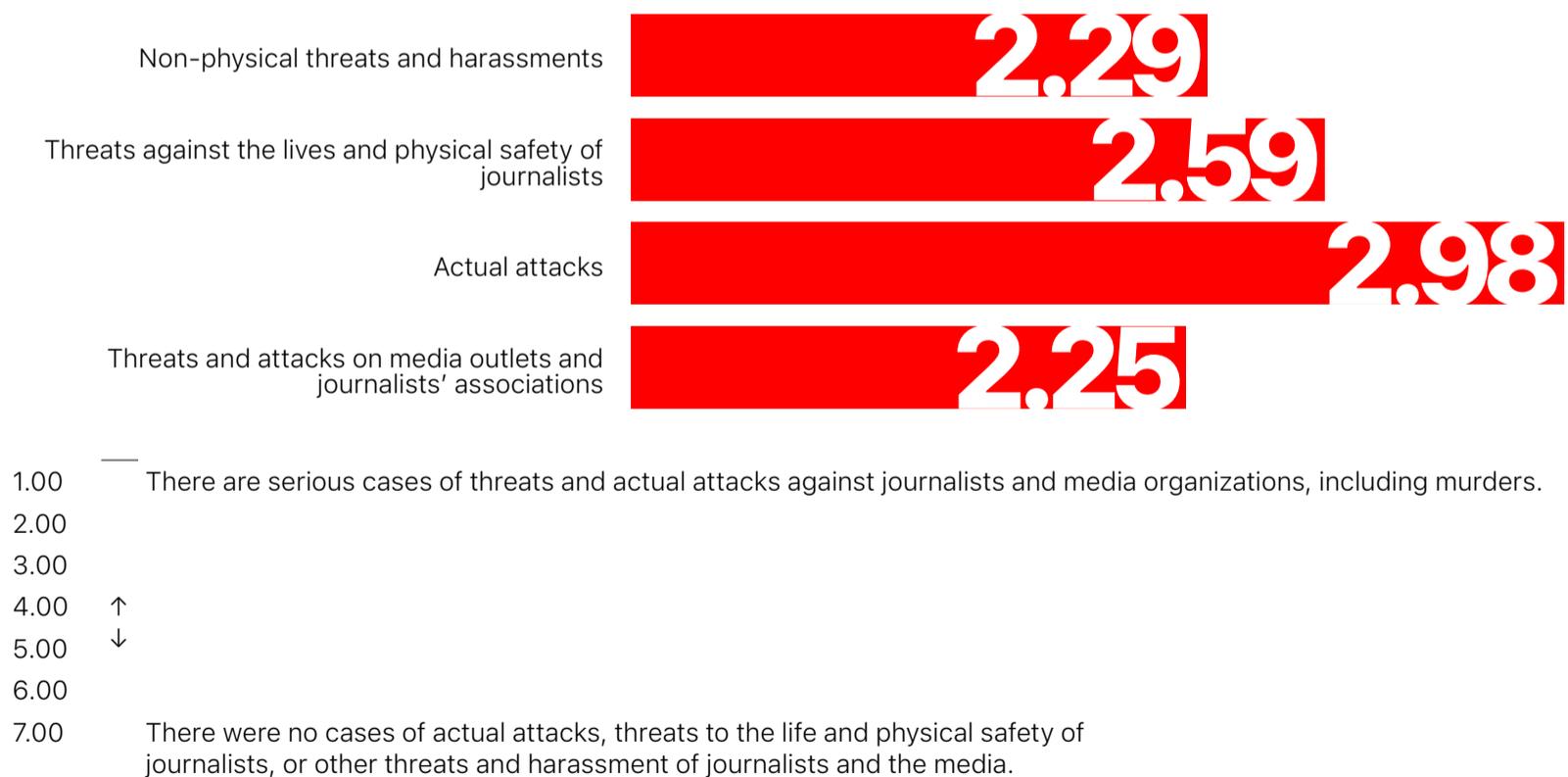
Score for 2023: 2.49 / Score for 2024: 2.51

There are still no official statistical data from state authorities on attacks against journalists and media workers. Although progress has been made through the appointment of contact points in prosecutors' offices and the police – whose role includes keeping records of attacks against journalists – there is no unified and publicly available database on attacks against journalists. Cantonal prosecutors' offices in BiH do not plan to create a joint database, as they consider all data to be available upon request.

The Guidelines for Chief Prosecutors adopted in 2024 'recommend' that chief prosecutors ensure the maintenance of special records on the number and type of cases involving attacks against journalists. Records on attacks against journalists are maintained by the BH Journalists Association through the FMHL and the SafeJournalists database. Both platforms contain comprehensive databases of attacks, threats, and pressures against journalists reported to the Association. State and international institutions largely rely on data and information provided by the BH Journalists Association in their reports on media freedom.

IV

Actual Safety



INDICATOR 4.1

— NON-PHYSICAL THREATS AND HARASSMENTS

These may include surveillance or monitoring; harassment via telephone; arbitrary judicial or administrative harassment; aggressive statements by public officials; and other forms of pressure that jeopardise journalists' safety while performing their work. These types of threats do not include workplace mobbing or violence.

Score for 2023: 2.33 / Score for 2024: 2.29

A total of 28 cases of attacks against journalists, media outlets, and media workers were registered in the SafeJournalists database, of which 9 cases involved harassment and threats not directly targeting journalists' lives or bodies. Of these nine cases, two involved groups of two journalists (in one case two women journalists, and in the other a woman journalist and a man journalist). Although these were not life-threatening attacks, such incidents – entailing insults, discrediting, profanity, refusal to answer journalistic questions, and political and economic pressure – remain extremely disturbing for journalists.

It is positive that the number of such cases significantly decreased compared to 2023, when 31 cases of non-physical threats and harassment were recorded. Unlike in 2023, repeated attacks against the same journalist were less frequent. In most cases, the perpetrators were persons holding public office, ranging from mayors and senior figures in religious communities to individual state agencies and institutions. Most often, these cases end with a report to journalists' associations and a public reaction from them.

One such case involved criminal charges filed against the responsible persons of the CIN – editor Renata Radić Dragić and director Leila Bičakčić – accusing them of having “endangered security, obstructed a fair trial, and prevented the collection of evidence”, as well as “abuse of office” during court proceedings against attorney Emina Begić from Bugojno.

INDICATOR 4.2

— THREATS AGAINST THE LIVES AND PHYSICAL SAFETY OF JOURNALISTS

These may include calls to kill journalists, their friends, families, or sources; calls for physical attacks against journalists, their friends, families, or sources. Threats may be direct or conveyed through third parties; communicated electronically or in person; and may be implicit or explicit.

Score for 2023: 2.59 / Score for 2024: 2.59

Out of the 28 registered cases of attacks against journalists in the SafeJournalists database, 4 cases involved threats to journalists' lives and physical safety. All cases concerned male journalists, and journalist Avdo Avdić received threats on two occasions in 2024. The number of direct threats was slightly lower than the number of indirect

threats, but all threats were extremely serious and called for endangering journalists' safety, including killing.

One example of such attacks involved hate speech and threats against Franjo Šarčević, owner and editor of the Prometej portal, which included an organised campaign and incitement via social media and content published by several portals. Individuals behind social media profiles from which the threats were sent announced their 'arrival at the faculty' and 'removal' of Šarčević from the Faculty of Natural Sciences and Mathematics in Sarajevo, where he worked as a professor. Shortly after this case, Franjo Šarčević left BiH with his family. Indirect threats were most often made via social media from anonymous profiles, but also from the personal profiles of politicians and public officials.

INDICATOR 4.3

— ACTUAL ATTACKS

These may include infliction of physical or psychological harm, kidnapping, home/office intrusion, confiscation of equipment, arbitrary detention, attempted murder, and similar acts.

Score for 2023: 3.08 / Score for 2024: 2.98

During 2024, two cases of physical attacks against journalists and media workers were registered, which is half the number recorded in 2023. Journalists were attacked directly, outside newsrooms, by unknown perpetrators. Cases of destruction of journalists' property were also recorded, specifically private vehicles.

Journalist Senadin Voloder of Stav magazine was attacked and abducted near the BiH–Montenegro border. An individual from the Montenegrin criminal milieu forcibly entered the journalist's vehicle and, after several minutes of driving accompanied by insults and death threats, ordered the journalist to exit the vehicle, which was later set on fire. The journalist reported the incident to the police; some of the perpetrators were identified and detained. All cases were reported to the competent authorities, and in all instances the BH Journalists Association responded with public statements. Journalists consider their reporting to be the main motive for most attacks.

INDICATOR 4.4

— THREATS AND ATTACKS ON MEDIA OUTLETS AND JOURNALISTS' ASSOCIATIONS

Threats may include harassment via telephone calls; unjustified judicial or administrative harassment; aggressive statements by public officials; and other forms of pressure (headlines, threatening messages, etc.). Actual attacks may include office intrusions, confiscation of property, damaged equipment, vehicles, and similar acts.

Score for 2023: 2.29 / Score for 2024: 2.25

In 2024, 12 attacks and threats against media outlets and organisations were recorded, five more than in the previous year. Politicians and persons holding public office sought to influence editorial policies of media outlets, and when unsuccessful, resorted to direct discrediting of the media and journalists. Members of the Sarajevo Canton Assembly, Haris Zahiragić (SDA) and Muamer Bandić (SBiH), launched severe attacks against TVSA and labelled its editors, while the Mayor of Zenica, Fuad Kasumović, using his influence, attempted to ban Radio Zenit and the Zenicablog portal from covering sessions of the Zenica City Council, as well as correspondents of media outlets headquartered outside Zenica (BHRT, FTV, FENA News Agency, Radio Federation, etc.).

The Minister of Foreign Affairs of BiH, Elmedin Konaković, who is also the president of the NiP Party, repeatedly attacked several media outlets at press conferences and through manipulated content on his Facebook profile. A striking example of unacceptable political interference in media work was an 'internal' letter from Our Party (*Naša stranka* – NS) sent to selected media outlets with instructions on how to report on Bojan Bošnjak, Minister of Justice in the Government of Sarajevo Canton and a member of NS, who was arrested and remanded in custody on suspicion of committing a criminal offense.

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Author
Lajla Zaimović Kurtović

Reviewer
Borka Rudić

Translation
Mirna Stanković Luković

Proofreading
Aida Spahić

Cover Photo
Andrija Vukelić

Design
comma.rs



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