Davor Marko

How to provide sustainable funding for civil society and community media: The case of Serbia and Western Balkan countries

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Davor Marko[1]

EXECUTIVE SUMMARY

This policy brief aims to recommend necessary regulatory and legal improvements to provide civil society media or community media in Serbia with more a friendly environment for their work.

Taking into consideration the fact that public and commercial media are significantly influenced by political and economic interests, the civil society media model represents an alternative way to enable citizens' direct participation in information flow, content creation and provide them with an opportunity to be adequately informed. The focus on Serbia, when it comes to analysis and recommendation, is justified by the dire political and economic situation of this country, enormous decrease of scores related to media freedoms, and feasibility to advocate changes and solutions of regulatory and legal framework, as well as in the domain of media practice.

In Serbia, there is a variety of citizen and civil society attempts to establish local media in order to provide reliable, trustworthy, timely and relevant information for their communities.

Different funding options -- public funding, donations, advertising, sponsorships, and other options to create incomes for CSO media -- are discussed and elaborated. Taking into account contextual factors that may influence their implementation and current practices, this analysis presents their strengths and weaknesses.

It is indicated that for the sustainable operation of civil society media, neither of the aforesaid options can work by themselves. Instead, a combination of various income sources should be recognized and stimulated by regulatory and legal framework to create a funding model for CSO media to rely on.

The recommendations for policy- and decision-makers fall into two main camps. One that includes legal redefinition of civil society media and a second one which supports creation of enabling environment for their sustainable work. Special sections in the recommendations relate to project co-funding with suggestions on how to improve this mechanism that is essential for CSO media. The final part includes recommendations for CSO media in order to build their internal capacities and become competitive in fundraising activities.

INTRODUCTION

Freedom of expression and freedom of the media in the region of Western Balkans, including Serbia, have been referenced by the leading international organization as a 'pressing issue'. According to the last EU Progress Report, issued on 17 April, 2018, there was no progress related to the freedom of expression. The environment in Serbia has been considered as unfriendly for its implementation, while the current legislation adopted in 2014 is still only partially implemented.[2] As such, the environment is considered as hostile to journalist and media, hindering their regular work and mandate to report critically, and – at the same time – preventing citizens to be fully, properly and timely informed.[3]

Therefore, this policy brief is focused on Serbia and discusses and recommends potential improvements and adjustments of its media regulatory and legal framework. The focus on Serbia can be justified due to the dire political and economic situation of this country, enormous decrease of scores related to media freedoms, and feasibility to advocate changes and solutions of regulatory and legal framework, as well as in the domain of media practice.

The political situation in Serbia has significantly deteriorated in the recent period and negative trends have been noted on a continuous basis. The most affected fields, besides electoral process and democratic governments, include media freedom. According to Freedom House, the democracy score in Serbia declined from 3.75 in 2016 to 3.82 in 2017, which is the lowest level since 2005.[4] Serbia recorded an overall drop when it comes to professionalism and pluralism in media.[5] The space for professional, independent and investigative journalism has been dramatically narrowed.[6] According to the

Reporters without Borders report, released in April 2018, Serbia is the only country from the Western Balkans that dramatically dropped in ranking (it dropped by 10 places). The climate has become more fraught since the presidential elections held in April, 2017. The incumbent president uses the pro-government media to intimidate journalists who are accused of "treachery" and of being "spies in foreign pay."[7]

Serbia is among the countries with the lowest level of trust in the media in the whole of Europe. Citizens of Serbia tend not to trust traditional media and online media score is only slightly better. While radio is the most trusted media in Western Europe, in South-East Europe, including Serbia, this is not the case and public radio is the second least trusted media, following the written press. Generally speaking, trust in media is at an all-time low, taking into account the general trend of misinformation and fake news, but also the context of illiberal democracy in which the media in the region, including Serbia, struggle to operate.[8]

In such a situation, journalism is under threat, and the basic right of citizens to be informed from reliable, free, trustworthy sources is highly endangered.

Funding is a core problem for media outlets in Serbia along with the way of how political incumbents and the state exercise control over the media's space. As indicated in the 2016 BIRN report, "although the amount of funding available from media advertising as a whole has stabilized, anecdotal evidence suggests that the ruling parties are able to exert greater influence over where media advertising is channeled, to the detriment of independent media outlets".[9] Such a situation leads to increasing self-censorship and different types of soft censorships performed by editors and managerial staff as a

2   European Commission, Serbia 2018 Report (SWD(2018) 152 final, Strasbourg, 17 April 2018).
3   Tanja Jakobi (ed.), Soft censorship: Changes in the media sector – from better to worse, (Balkan Investigative Reporting Network, 2016).
4   Miloš Damnjanović, 'Serbia' (Freedom House 2017) 1.
5   IREX, 'Media Sustainability Index 2017: Serbia' (IREX MSI).
6   Jakobi (ed.), Soft censorship…
7   Reporters without Borders, 'World Press Freedom Index 2017: Serbia,' (RSF, April, 2018).
8   European Broadcasting Union, Trust in Media 2018 (EBU Media Intelligence Service, Geneva, February, 2018).
9   Tanja Jakobi (ed.), Soft censorship…

result of political and business pressure, mainly through ownership influence or through funding.[10]

As a solution to this situation, support to grass root and citizen initiatives in the domains of communication and journalism seem to be highly important. The model of civil society or community media represents an alternative to the public and commercial media that are captured by narrow political and economic interests. In Serbia, there is a variety of citizen and civil society attempts to establish local media in order to provide reliable, trustworthy, timely and relevant information for their communities. The institutional, regulatory and legal framework needs to be adjusted in order to provide them with a friendly environment, including sufficient, regular and transparently allocated funding.

Contextualized solutions and recommendations will be provided on how to improve the current regulation and legal provisions in order to allow more flexible and favorable conditions for civil society media, their funding and operation. Solutions and recommendation provided in this policy document are tailored for Serbia, but some of these could be applied in other countries of the region.

PROBLEM DESCRIPTION

While the latest reports on the state of media and freedom of expression generally in Serbia indicate negative trends, the alternative ways of informing citizens do not attract sufficient research and policy attention.

Commercial media have less and less con- tent that promotes public interest,[11] and an increasing amount of content that is not relevant for local communities. At the same time, public media services do not fulfil its remit envisioned in legal documents. Available monitoring results show that the program of public service broadcasters only formally meets obligations prescribed by Law,[12] but there are numerous indicators that point to the lack of program quality. For example, political bias was indicated in the news program, with a large number of pseudo-events whose actors are bearers of high political functions. The lack of content in minority languages on RTS has been highlighted as yet another major problem.[13]

Civil society or community media remain the only alternative to politically captured, state and commercial media on the Serbian media scene[14], and they can contribute to the freedom of expression in the domain of information in minority languages, information at local and regional level. Due to the political control over mainstream media, bad privatization that left many journalists unemployed and specific information needs of communities in local areas, this model of media represents a unique opportunity to fill the niche.[15]

When compared to other fields, political or media, civil society represents the vibrant part in Serbian society. CSOs are crucial non-institutional actors, along with professional media associations, that regularly report on problems, advocate needs of citizens or the journalistic community, providing solutions and, generally speaking, exercising the role of control. Despite the huge amount of registered organizations in Serbia – close to 29,000[16] - a significant number

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10 Ibid.

11 Personal interview with representative of the leading media market research agency in Serbia, IPSOS Strategic Marketing.

12 Dubravka Valić Nedeljković, Rade Veljanovski and Stefan Janjić, 'Izveštaj o monitoring programskih šema RTV i RTS, kao indikatora ostvarivanja zakonskih funkcija javnih medijskih servisa,' (Medijska (ne)zavisnost u 2015, Novosadska novinarska škola, 2015) 24-25.

13 Dubravka Valić Nedeljković, 'Javni servisi (ni)su u službi građana,' (SEE Media Observatory, 2015) 8, 12.

14 Nedim Sejdinović i Žužana Serenčeš, 'O medijima civilnog društva: Uputstvo za upotrebu,' (Nezavisno društvo novinara Vojvodine, 2016) 16.

15 Sejdinović i Serenčeš, 'O medijima civilnog društva...;' Miloš Stojković i Jovanka Matić, 'Medijska reforma nakon pet godina od usvajanja Medijske strategije: Presek stanja i preporuke za budućnost,' (expert report, OSCE conference, Belgrade 17 and 18 November, 2016).

16 The Serbian Business Registers Agency, http://www.apr.gov.rs.

is inactive or modestly active, and those that perform regularly report funding-related problems for their operations. Among the main reasons, they mention a decline in donors' help and underdeveloped philanthropy in Serbia.[17]

Regulatory and legislative framework in Serbia recognizes civil society media, even providing a variety of sources for their funding. Practice indicates that this is not sufficient and analysis and evaluation of various sources of funding in this policy brief will indicate strengths and weakness of each, and provide the list of recommendations to improve the current situation. Serbia will be the focus, but also examples of good practice from other countries will be taken into account and provided within the text.

2.1. Funding: Regulatory and legal framework

Serbian Law on public information and media (2014) defines what media are (article 29) and what media are not (article 30). Three defining elements or requirements for media are media content, distribution channels and editorial control. Additionally, in order to be recognized by the state and eligible for public funding, media outlets need to be recorded in the Media registry.

Civil society media are explicitly mentioned only in the 2014 Law on Electronic Media (article 72), which states that the main purpose of these media is to fulfil the interest of citizens, community or group, and not to make profit.

According to the Serbian regulatory agency, there are 31 civil society media registered in the media Register.

There is no separate regulation related to civil society media, they have a similar status to other media outlets (article 72). This may put electronic or broadcasting civil society media in a dire situation since they need to get a license to operate and broadcast their programs. This process is complex and expensive. On the other hand, for WebTV and online radio stations, there is no need for a license.

The law on Public Information and Media outlines several sources of funding for media, including public funds (project co-funding), donations, citizens' contributions, sponsorships, and other sources. Project co-funding for media content of public interest, as the most important model or mechanism of public support to media, excludes public media services, media in Serbian language that operate in Kosovo and Metohija, and media that are governed by national minority councils. Additional funding could be collected through advertising, and civil society electronic media are subject to the same limitation as other electronic media, which prevents them from having more than 6 minutes of advertising content per 1 hour of program.

2.2. Funding: Practice

In this part, the current practices related to civil society media will be presented, with an emphasis on project co-funding as the most widespread source of public support to media.

There are three common ways to support civil society media in Serbia: donations, public funding allocated directly from budgets, and public funding distributed through project co-funding on a more competitive basis.

Table 1: Number of registered media in Serbia

Media service offers		
Commercial	Civil society media	Public media services
344	31	2
Total	377	

Source: Regulatory agency for electronic media (2018)

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17 Miloš Damnjanović, 'Serbia' (Freedom House 2017).

Table 2: Media project co-funded by the Ministry for Culture and Information

Year	Amount (Serbian dinars - RSD)	Number of projects supported
2015	121 million	190[18]
2016	151.4 million	176[19]
2017	70 million (TV)	70[20]
	86 million (print, radio, online and agencies)	135[21]
Total	428.4 million	571

Source: Ministry for Culture and Information

Table 3: Number of calls and amount of money allocated for project co-funding on local level

Year	Number of calls	Amount of money (RSD)
2015	154	312.5 million
2016	141	275 million
Total	295	587.5 million

Source: Coalition of Journalist and Media Organizations

Project co-funding allocated from public resources has been considered as the most stable mechanism for media sustainability and sustainability of reliable, quality and public interest-related content production.[22]

In practice, project co-funding that is aimed at improving the content quality and providing resources for local and regional (including civil society) media, represents the 'battlefield' in which interests of media owners and local self-governments clash. Citizens and their interests and need for reliable, timely and objective reporting have been neglected.[23]

A comprehensive monitoring of project co-funding in 2015 and 2016, conducted by the Coalition of Journalist and Media Associations indicated that almost one fifth was irregular in its initial phase (call for applications), while in almost 70 % cases irregularities include call for applications, selections of commission members, and transparency of the process. The entire amount that was distributed in these problematic cases was 1,085,424,137 RSD or 76.27% of the entire amount distributed throughout the project co-funding. Such a distorted funding model, where the state preserved a strong influence over the media sector and over the process of fund allocation, led to over-commercialization of media content, which in turn resulted in inadequate representation of public interest in media sphere and the failure of media policy in the area of media pluralism.[24]

This is where the European Commission indicates the proper implementation of media re-

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18   Republika Srbija, 'Rešenje o raspodeli sredstava za 2015. godinu,' (Ministarstvo kulture i informisanja, 11 maj, 2015).

19   Republika Srbija, 'Rešenje o raspodeli sredstava za 2016. godinu,' (Ministarstvo kulture i informisanja, 22 jul, 2016).

20   Republika Srbija, 'Rešenje o raspodeli sredstava za televiziju za 2017. godinu,' (Ministarstvo kulture i informisanja, 31 maj, 2017).

21   Republika Srbija, 'Rešenje o raspodeli sredstava za štampane medije, internet, radio i agencije za 2017. godinu,' (Ministarstvo kulture i informisanja, 31 maj, 2017).

22   Coalition of Journalist and Media Associations, 'White book...'

23   Coalition of Journalist and Media Associations, 'White book...'

24   Ibid.

lated laws in Serbia as a big challenge and states that "transparent ownership and funding of private media, state aid to media and co-funding of media content needs to be efficiently overviewed, including the media at local level, and implemented in line with the current legislation".[25]

Other ways of funding that include advertising, crowdfunding, membership fees, sponsorships and earning from special services and activities are not present in practice, as research conducted for this policy has shown

3.POLICY OPTIONS: ANALYSIS AND EVALUATION

in this section, different funding options are outlined and their feasibility is evaluated taking into account contextual factors and experiences with their implementation. Their strengths and weaknesses will be elaborated briefly. The options considered herein include public funding, donations, advertising, sponsorships, and other options to create incomes for CSO media.

Policy option 1: Public funding

The most common model or mechanism to provide funding for civil society media is project co-funding. In the case of Serbia, institutions at different levels (state, provincial and local) provide funding on a regular, annual basis.

Project co-funding is legally defined under the Law on Public Information and Media (articles 15 to 29), as well as by the Rulebook on the co-funding of projects of public interest in the field of public information. Other relevant legal documents include the Law on State Aid as well as the Regulations for the rules for allocation of the state aid, and Regulation on the manner and procedure for State Aid application.

Project co-funding on a continuous and regular basis is the most efficient mechanism to support civil society media if they fulfill the criteria and conditions required by law. When it comes to requirements, electronic civil society media are considered to have the same status as other electronic media and need to acquire the necessary licenses and pay contributions to be eligible for funding. Also, all media – regardless of type – must be registered in the Media Registry to be eligible for funding. Declaratively, the advantage of this mechanism is its aim to promote content of public interest, to set criteria and professional standards in reporting, equal opportunities for all potential applicants, decentralized distribution which enables competition and transparency that is guaranteed by law.

On the other hand, practices that are monitored and regularly analyzed within the last three years have indicated several substantial shortcomings of this funding mechanism:

Table 4: Project co-funding – strengths and weaknesses

Strengths	Weaknesses
Regularly and continuously provided funds on annual basis Promotion of media content of public interest Set of criteria (high quality, authentic and original content) Professional responsibility required Equal opportunity for all who fulfil criteria for application Transparent process is legally defined Competition	Irregularity in the process of allocation Commissions are not independent Members of commissions are appointed along political and interest lines Process is driven by private and political interest Certain media are favored Monitoring and evaluations

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25 European Commission, 'Non Paper o trenutnom stanju u poglavljima 23 i 24 za Srbiju,' (European Commission, November 2017).

- its failure to comply with the call for tenders, which is insufficiently defined in the law on Public Information;
- misuse of the public procurement system;
- inadequate definition and explanation of the purpose of the competition for project co-funding;
- insufficient amounts to be allocated for project co-financing (especially in certain local communities);
- discriminatory criteria and requirements in the call;
- controversial issues regarding the appointment and work of expert commissions;
- revision of decisions (and proposals) provided by expert commissions;
- lack of transparency in the process;
- inadequate monitoring system, generally related to the control of compliance with legal obligations, especially in the context of project evaluation and monitoring of spending of funds (control of state aid), and absence of (adequate) sanctions.[26]

Policy option 2: Donations

For a long period of time, Serbian alternative and independent media have been heavily supported externally, by various donors and media development organizations.[27] This type of support is still substantially important for civil society media, as well as for media that work independently from political and economic interest groups.

The most important donors in Serbia include those from the United States (USAID through contractual partners, such as IREX or the private Open Society Fund with its local branch in Serbia), from the EU, and several local donors including the recently established Slavko Ćuruvija Foundation.[28] Some other local organizations, such as Belgrade Open School, support media on specific topics, for example European integration.[29]

To support potential applicants and CSOs, there are several online bases with complete information on donors, calls for applications and procedures CSOs and the related media need to fulfil in order to be eligible for funding.[30]

Lessons learned from the previous donors'

Table 5: Donor's support – strengths and weaknesses

Strengths	Weaknesses
Tradition of donor-based media initiatives Existence of donor's base / and donors' calendar Result driven support Support for niche media, marginalized groups and content that is missing on the market Changed approach of most donors and media development organizations	Occasional, not regular, support Non-sustainable outcomes Distance (donors are in the capital; local actors have no direct access to them) Donor-driven support (donor's aims and goals are guiding the process and set the agenda) Label of 'mercenaries' (or those who are begging for help) Lack of project management and financial management skills among CSO staff

26 Coalition of Journalist, 'White book of project co-funding…;' Miloš Stojković, 'Legal analysis of the project co-funding of content of public interest in the Republic of Serbia,' (NUNS, April, 2017) 17.

27 Davor Marko, 'Media reforms in turbulent times' (Analitika – Center for Social Research, Sarajevo, 2013).

28 Davor Marko, 'European Commission, imely, relink of Belgrade', 2018 interest society media in Serbia more sustainableocal media and timely, relMedia reforms…'

29 For example, see the following link of Belgrade's Open School: http://www.bos.rs/cd/vesti/163/2017/03/27/lista-odobrenih-predloga-projekata-u-okviru-programa-podrske-civilnom-drustvu-i-medijima-u-oblasti-evropskih-integracija.html.

30 For further information see: Guide through potential sources of funding: https://vodic.gradjanske.org; and TACSO – Donor's basis: http://www.tacso.org/Content/Read/67?lang=sr.

and media assistance intervention, indicate the importance of this support, especially for independent and small and local media outlets. On the other hand, certain shortcomings have been detected:

- this support was of the short- and mid-term range leaving supported media with no exit-strategy and struggling with sustainability;
- support was driven by donor's interests which rarely reflects the real needs of media and citizens at local level;
- most dominant type of international support was through grants and trainings, with little support in domain of managerial, business and project-related skills;
- there was a lack of proper monitoring and evaluation of activities aiming to support media, media content and building an enabling environment in Serbia.

Considering all of the above, it could be concluded that international (and local that is very modest but exists) media assistance significantly influenced the process of media development in Serbia. However, their results appear to be rather fragile, and this urges for a more contextualized and strategic engagement of donors, other international actors, and a growing camp of local supporters is needed.[31]

When it comes to civil society media in Serbia, and also in the region, their staff generally lack the skills, knowledge and contacts (there are generally detached from the capitals) necessary to comply with application procedures and project implementation.[32]

Policy option 3: Advertising

The most widespread models and mechanisms of this type of funding are direct advertising, advertising through marketing agencies, state advertising and growing digital or online marketing activities.

CSOs and CSO media have not developed marketing skills and activities, especially in the domain of digital marketing and advertising.[33] This model – if developed – can only be implemented as supplementary (and minor) source of incomes for their work.

Micro-funding is another model that could be implemented in the domain of digital platforms and online media. Pay per click or pay per read may be potentially good solutions to be embedded as part of their existing online platforms.

Policy option 4: Sponsorship

While donations, in the Serbian context, apply to the situation in which recognized and international donors support media outlets through formal arrangements, such as projects, for a shorter period of time, sponsorship implies more sophisticated relations that include long-term partnership and business-driven motives.

Table 6: Advertising – strengths and weaknesses

Strengths	Weaknesses
Digital marketing provides many opportunities for continuous incomes Micro-funding provides a good basis for regular incomes	Small market, especially in local communities Legal restrictions for electronic / broadcasting media Political ties (for state and advertising through agencies) Lack of knowledge in the domain of digital and online marketing

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31 Davor Marko, 'Media Assistance in Serbia: Achievements and Challenges' (Policy Brief, Analitika – Center for Social Research, February 2014).

32 Sejdinović i Serenčeš, 'O medijima civilnog društva…'

33 This observation is based upon multiple sources authors consulted during his field research.

Table 7: Sponsorship – strengths and weaknesses

Strengths	Weaknesses
Cross-sectorial collaboration Social responsibility and rising awareness Rapid growth of Serbian digital economy	Lack of tradition of this kind of partnership Very few initiatives in this domain No adequate knowledge and skills among CSOs

Sponsorship does not exclude a philanthropic element, but partnership between specific sponsors (public companies, private sector) and media, communication start-ups, usually implies mutual interests are included.

This type of partnership is not inherent and recently only few initiatives of this kind appeared. For example, the Propulsion Fund, jointly with leading regional businesses, propels impactful and smart corporate social investment programs across the Western Balkans, including Serbia. When it comes to media content, they recently supported Balkaninsight and stories on extremism and radicalization online throughout Resonant Voices Initiative.

Policy option 5: Citizen's direct support

Based on experience and existing practices in Serbia, the most common model or mechanism is membership fees. For example, professional media associations earn part of their income through this model, but this is far from being sufficient for their real needs. CSOs usually do not have this model developed and implemented into practice.

Crowdfunding is another significant model that could be put into practice, especially taking into account the advent of digital platforms,

possibilities for online activities, promotion and visibility. There were no significant activities in this domain in Serbia, but some organizations such as KRIK, or Forum, Radio Student and Lupiga from Croatia organized crowdfunding campaigns to attract wider citizens' support for their activities, including financial.

This model enables CSOs media to establish direct relations with citizens and members of their communities, as final beneficiaries of their work. This model also enables CSO media to self-govern themselves and their incomes. It requires CSOs staff to possess certain business and communication skills required to approach the citizens and promote themselves effectively.

Volunteering comprises both the strengths and weakness of this option. There are examples of citizens being aware of their duty to contribute to development of their community and expressing solidarity to support CSO initiatives or self-organize themselves. Additionally, bad and uncertain economic situations, unemployment and low incomes represent an additional obstacle for this option.

Policy option 6: Other

The most common model or mechanism is development of portfolio of its own services. Social entrepreneurship, publishing activities,

Table 8: Citizens' direct support – strengths and weaknesses

Strengths	Weaknesses
Ability to control own activities and plan to generate incomes Membership fees Volunteering	Not systematic Lack of skills in business Not embedded in local culture Lack of philanthropy Low incomes of citizens, especially in local areas Volunteering

Table 9: Other kind of support – strengths and weaknesses

Strengths	Weaknesses
Creating its own system Own boss Developing business model based on demand / supply logic Auctions as format – citizens could offer goods, sponsors services Specialization	Lack of awareness Lack of entrepreneurial spirit No initiatives Lack of knowledge and skills

organization of events, providing services. For example, KRIK (Network to Investigate Criminals and Corruption) developed training and non-formal education to report on corruption and offer this to other media, earning a part of incomes this through this activity.

Attending various practical trainings, conferences and establishing partnership with different stakeholders aiming to sow and further develop entrepreneurial skills of those who govern and lead CSO media would lead to more innovative, creative and feasible solutions for funding. Permanent communication with community members, research of their needs and the creation of a business model that matches it in a feasible manner may lead to regular incomes. Being specialized in specific fields (reporting on minorities, on marginalized people, refugees) or having specific skills (such as digital, journalistic, technical, etc.) that are demanded on the market provide a space for organizing paid courses or training that could generate incomes.

CONCLUSIONS AND RECOMMENDATIONS

For the sustainable operation of civil society media, there is a need for more precise recognition of this type of media in Serbian laws, a more nuanced and sophisticated regulatory approach in order to provide them with a friendly environment for work and further development.

The preferred funding policy alternative is not based on any of the discussed sources of funding alone, but rather is in favor of a model that combines different kinds of sources in a meaningful ratio.

Therefore, the recommendations for policy-

and decision-makers (in the case of Serbia the main entity is the Ministry for Culture and Information) fall into two main camps. One that includes legal redefinition of civil society media and the other that supports creation of enabling environment for their sustainable work.

Legal redefinition of civil society media should contribute to:

•   recognition and better conceptualization of civil society media regardless of the platform they use to distribute the content (print, electronic, online);
•   identification of the main principles CSO media need to follow, similarly to the public service media, including transparency, objectivity and professionalism;
•   protection of independence of civil society media and their editorial policy, through precisely defined relations between the media outlet and their CSO publisher;
•   transparent procedures of nominations and appointments of steering and executive boards of civil society media, among citizens and media professionals;
•   establishment of their associations and networks to maximize reporting efforts.

Creating enabling environment for development, operation and financial sustainability of civil society media, through the following means:

•   developing model(s) of funding for civil society media enabling their long-term sustainability, that will combine income from individual donations, ownership share, crowdfunding, corporative donations, and public funding;

- indirect subventions, which include tax free regime, tax incentives for employing young journalists, exemption from paying individual fees to get license (for electronic civil society media), privileged position in paying fees for exploitation of copyright and related rights and other reliefs;
- creation of a special fund to support media content and programs produced by civil society media that will combine incomes from different sources (taxes from public service media, lottery, telecom operators, etc.), and that will be governed independently by CSOs and in a transparent manner. A model example to be built upon is a fund existing in Croatia. A specific set of criteria has to be developed to define the purpose and the use of this fund.

Taking into account that *public funds and project co-funding are considered to be the most significant sources of funding* for civil society media, there is a need to further improve this mechanism, especially in the following domains:

- transparency of the entire process has to be secured as well as availability of public money to support media related projects. Regular publishing of internal reports, both narrative and financial, will contribute to the transparency of the entire process;
- more efficient control should be established, as well as efficient and straightforward system of monitoring and evaluation, and this should be prescribed and precisely defined by the law;
- obligatory analysis and assessments of needs for certain types of media content should be regularly carried out, including the economic analysis of costs necessary to produce certain media contents;
- to secure independent work of commissions and their integrity, a clear rules and criteria that should be met by candidates for commissions need to be defined, as well as the term 'media expert' has to be precisely defined to grasp both, academic vacation and professional experience relevant for the call;
- adequate sanctions for all who breach procedures and rules should be defined.

To achieve this, there is a need to amend the Law on Public Information and Media with sub-legal documents.

In order to be competitive on the media market, *civil society media need to continuously improve their internal capacities*, and this include the following domains:

- Fundraising and relevant business skills
- Project management skills,
- Digital marketing skills,

There are plenty of opportunities, from online courses, to existing materials and guidelines for CSOs produced by professional associations, international organizations, specific events (conferences, training, workshops) organized and provided to raise awareness and skills among CSOs and their staff.

Additionally, civil society media should combine their efforts through:

- formal (networks) and less formal collaborative efforts with other CSO media in Serbia and the region;
- establishing partnership with business sectors and funds providing support for innovative ideas and original content production;
- using the advent of digital platforms and online sources to attract support for outlets or specific projects or content these media are implementing.

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