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Shadow report on media freedom in North Macedonia

Metamorphosis Foundation

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Introduction

North Macedonia's European path began in 2005, when it was granted candidate status for membership in the European Union (EU). As part of its EU accession process, North Macedonia is required to align with the EU *acquis communautaire*, the set of norms and standards for stable and functioning democratic governance.

Among the 35 negotiating chapters, chapter 23 and chapter 24 deal with various issues linked to the respect for the Rule of Law, including fundamental rights, the independence of the judiciary, anti-corruption and democratic checks and balances¹. Among these, media freedom and independence stands out as crucial elements to ensure the democratic stability of the country.

Media freedom in North Macedonia presents a mixed picture. Although violence against journalists has declined and legal reforms have brought the country closer to European standards, significant challenges remain. These include widespread disinformation, low levels of journalistic professionalism, particularly online, political and economic pressure, weak regulatory frameworks, and diminishing public trust. Additionally, negative rhetoric from certain public officials and foreign interference also contribute to a fragile media environment.

As an EU candidate, North Macedonia undergoes an annual review of its reform progress. Each year, the European Commission's progress report assesses the country's preparedness and alignment with EU standards, including media freedom.

Since 2024, North Macedonia and other candidate countries have also been included in the EU's annual Rule of Law Report, a Mechanism launched in 2020 to monitor developments and risks related to the rule of law across member states. The report covers four main areas: 1) the justice system, 2) the anti-corruption framework, 3) media freedom and pluralism, and 4) institutional checks and balances. Since 2023, the Commission has also issued country-specific recommendations, urging national authorities to promptly address identified issues.

¹ Chapters of the *acquis*

The Rule of Law Report for candidate countries complements the European Commission's traditional annual reports, typically released at the end of the year.

This shadow report offers an updated overview of North Macedonia's media landscape. It highlights both positive developments and persisting or emerging challenges. The report also includes a set of recommendations addressed to national authorities and EU stakeholders, urging decisive action to uphold media freedom in line with European and international standards.

Country context

Political System and Demography

North Macedonia is a constitutional Republic with a parliamentary democratic system of governance. The Constitution recognizes both the individual rights of all citizens and the collective rights of specific ethno-cultural groups residing within its borders.

The country is characterised by its multicultural and complex ethnic composition. According to the 2021 Census, the resident population stands at 1,836,713. The largest ethnic group is Macedonians, comprising 58.44% of the population. Ethnic Albanians constitute the second-largest group at 24.30%. Other significant communities include Turks (3.86%), Roma (2.53%), Serbs (1.30%), Bosniaks (0.87%), and Vlachs (0.47%), with a small percentage belonging to other ethnic affiliations (0.26%). Notably, the 2021 Census faced political controversy, leading to a boycott by some, resulting in 7.2%² of the population having an unknown ethnic affiliation as data was derived from administrative sources.

Macedonian is the official language across the entire territory. Albanian also holds official language status at the central institutional level and is co-official in the capital, Skopje, and in 25 out of the 80 municipalities, reflecting the significant Albanian population.

² Census of Population, Households and Dwellings in the Republic of North Macedonia, 2021, https://www.stat.gov.mk/publikacii/2022/POPIS_DZS_web_EN.pdf

Economic Situation

North Macedonia's economy faces considerable challenges, impacted significantly by key socio-political issues such as high levels of corruption, persistent rule of law concerns, and inefficiencies within the state administration. Recent inflation trends negatively affected living standards and increased poverty levels. Economic growth was modest, recorded at 1.8% by the World Bank for 2023, below earlier estimates. The unemployment rate hovered between 12-13%. The GDP per capita in 2023 was approximately EUR 7,480, with an average monthly salary around EUR 595, among the lowest in the region.

Political Situation and EU Accession

The political landscape is highly polarized, dominated by divisions related to the country's EU accession process. A major point of contention continued to be the condition set by neighbouring Bulgaria and included in the EU negotiations framework, requiring the inclusion of the Bulgarian minority in the Constitution's preamble for the accession process to advance. Despite significant domestic opposition and controversy, international actors encouraged the government to meet this requirement. However, these amendments failed to pass due to lack of political consensus, particularly from the former opposition, now ruling VMRO-DPMNE party, and low public support (around 24% according to polls)³.

Systemic corruption remains a critical issue, contributing to extremely low public trust in political and judicial institutions, as highlighted by surveys from the International Republican Institute (IRI)⁴. This environment formed the backdrop for the presidential and parliamentary elections held in May 2024, which resulted in a victory for the centre-right VMRO-DPMNE party, forming a new government coalition with the ethnic Albanian VLEN coalition. The ongoing political divisions and the unresolved constitutional issue related to EU accession continue to shape the country's political trajectory.

³ 82% of Macedonians and 11.3% of Albanians are against constitutional amendments to include Bulgarians in the Constitution. Source: 360 Degrees based on Detktor and Institute for Political Resecarh, accessed 5.5.2025. <https://360stepeni.mk/protiv-ustavni-izmeni-se-82-od-makedontsite-i-11-3-od-albantsite/>

⁴ National Survey Of North Macedonia | April – May 2023 <https://www.iri.org/wp-content/uploads/2023/07/IRI-N.Macedonia-Apr-May-2023-Poll.pdf>

1. Media freedom in North Macedonia

1.1 Overview: progress and persistent challenges

North Macedonia presents a complex picture regarding media freedom. International rankings, such as the World Press Freedom Index, place the country in the mid-range globally - 42nd out of 180 in 2025 down from 36th in 2024 - reflecting improvements from earlier years, but also indicating persistent challenges⁵. The Media Pluralism Monitor (MPM) 2024 assesses the overall risk in the 'Fundamental Protection' area as medium (35%), noting a slight increase in risk compared to the previous year⁶.

While journalists do not generally operate in an overtly hostile environment compared to the past, significant hurdles hinder the development of a truly independent, pluralistic, and sustainable media sector capable of fully serving the public interest and strengthening democracy. As one professional interviewed for this report pointed out: "Media freedom is one of the strongest indicators of a country's overall level of freedom"⁷.

The country has made strides in aligning parts of its legislative framework with European standards and has seen a decline in physical attacks against journalists. However, issues such as widespread disinformation, varying levels of professionalism, problematic attitudes from some government officials towards journalists, political pressures, economic precarity, and gaps in regulation continue to cast a shadow over the media landscape and contribute to low public trust. As one report notes, despite a "favourable socio-political climate for media work, disinformation and the low professional level, especially online, reduce trust in the media"⁸.

Foreign Information Manipulation and Interference (FIMI) also significantly challenges the media environment, exploiting domestic vulnerabilities like poor media professionalism and political turmoil.

⁵ Reporters Without Borders. (2025). 2025 World Press Freedom Index. <https://rsf.org/en/country/north-macedonia>

⁶ Micevski, I., & Trpevska, S. (2024, June). Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European member states and Candidate Countries in 2023 - Country report: The Republic of North Macedonia. European University Institute, Centre for Media Pluralism and Media Freedom. (Hereafter referred to as MPM 2024 Report) <https://op.europa.eu/en/publication-detail/-/publication/d66622e8-4fb4-11ef-acbc-01aa75ed71a1>

⁷ Interview 4.

⁸ Nikodinoska, V., & Chausidis, T. (2025). *Deprived Media Market, Low Ethical Standards, Need for Effective Legislation: The Future of the Media in North Macedonia - Facts and Trends*. SEENPM, Mediacentar Sarajevo, Macedonian Institute for Media, Peace Institute. <https://futureofmedia.seenpm.org/wp-content/uploads/2025/03/Ourmedia-North-Macedonia-EN.pdf>

Freedom of expression is constitutionally guaranteed, and censorship is prohibited⁹. Yet, the practical realities faced by journalists and media outlets often diverge from these constitutional ideals. The overall environment remains more conducive to press freedom compared to previous periods, but this progress is often described as fragile or resting "on thin ice"¹⁰.

Threats and pressure, particularly from political figures, business interests, and through online channels, remain a concern, impacting journalists' ability to work freely and critically.

Strong political polarization contributes to pressure on the media, with major parties sometimes fostering parallel media systems subject to political and economic influence. Furthermore, low public trust in institutions, including the media, driven by high levels of perceived corruption and institutional inefficiency, undermines the media's crucial role as a watchdog and a pillar of democratic society.

1.2 The media market: fragmentation, economic pressure, and ownership

The media market in North Macedonia is characterised by significant fragmentation, particularly with the proliferation of online platforms alongside traditional media. Compared to the size of the country and the market's economic potential, there is a disproportionately large number of broadcasters. The Media Pluralism Monitor 2024 highlights this fragmentation across TV, radio, print, and online sectors¹¹.

However, the number of traditional broadcasters (TV and radio) has been declining, often due to financial difficulties. This decline is especially noticeable at the local and regional levels, where the few remaining media outlets operate under challenging economic conditions, leading to the emergence of so-called media deserts. The underdevelopment of the local and regional media market, combined with the lack of coverage of local issues by national TV, radio, and media outlets, poses a serious threat to media pluralism.

Strong political polarization contributes to this landscape, with suggestions that the largest parties cultivate parallel media systems subject to their influence.

⁹Constitution of the Republic of North Macedonia, Article 16. <https://www.slvesnik.com.mk/content/pdf/USTAV-eng.pdf>

¹⁰ Association of Journalists of Macedonia (2023). Media Freedom in North Macedonia: Fragile Progress - Fact-Finding Press Freedom Mission Report <https://znm.org.mk/en/progress-on-glass-legs-a-report-from-the-mission-for-assessing-the-state-of-freedom-of-the-media-in-macedonia/>

¹¹ Micevski, I., & Trpevska, S. (2024, June). Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European member states and candidate countries in 2023 - Country report: The Republic of North Macedonia. European University Institute, Centre for Media Pluralism and Media Freedom. <https://cadmus.eui.eu/server/api/core/bitstreams/ed9fd83e-1455-5e49-b698-ae3bf0999e2a/content>

The public service broadcaster (MRT) faces continuous political pressure and financial instability, which undermine its ability to serve as an impartial provider of content in the public interest. Inadequate funding results in low salaries and poor working conditions, leading to limited professionalism and lower-quality content. MRT's output is largely confined to basic news reporting, lacking critical analysis and offering little in terms of diverse or pluralistic programming. To help address the absence of in-depth reporting, MRT has partnered with non-profit media organizations, such as the Investigative Reporting Lab and 360°, to co-produce investigative journalism content.

The limited economic potential cannot sustain the robust development of the audiovisual sphere or ensure the long-term sustainability of many media outlets. The financial struggles result in a lack of professional staff, limited diversity in programming, insufficient domestic production, and difficulties in maintaining high professional standards. The print media sector faces the most severe challenges, with very low circulation numbers for the few remaining daily newspapers.

During the 2024 elections, 249 online media (internet portals) registered to receive paid political advertising, highlighting their increasing role, but also raising transparency concerns as many lacked proper identifications or were newly established¹².

The number of online media outlets is rapidly increasing. However, as one interviewee noted, “despite the large number of media outlets, we can't say we have a truly pluralistic media landscape. This is largely because most outlets focus primarily on national politics, often neglecting coverage of other regions and important topics such as social issues and the environment”¹³. In addition, the high number of online media also exacerbates market fragmentation and raises concerns about professionalism, sustainability, and the spread of disinformation, especially in the absence of regulation.

However, new amendments to the existing media law adopted in March 2024, including the creation of an official register for online media, represent a step forward toward addressing these issues¹⁴. Non-profit media remains one of the most underdeveloped segments of the media landscape.

¹² IFES & Metamorphosis Foundation. (2024, December). Towards Inclusive Internet Portals and Election Advertising in North Macedonia. https://metamorphosis.org.mk/en/izdanija_arhiva/towards-inclusive-internet-portals-and-election-advertising-in-north-macedonia/

¹³ Interview 5.

¹⁴ Evaluating North Macedonia's Media Law Reforms—A Partial Step Toward European Standards; Metamorphosis Foundation 2025 <https://metamorphosis.org.mk/wp-content/themes/metamorphosis/download.php?id=45569>

Transparency of media ownership is relatively high for broadcasters and print media, as they are legally required to report ownership structures to the Agency for Audio and Audiovisual Media Services (AAAVMS), which is responsible for publishing this information.

However, this transparency does not extend to online media. The MPM 2024 assesses 'Transparency of media ownership' at medium risk (48%), primarily due to the under-regulation of the online sector, while noting high risk (75%) regarding disclosure specifically in the digital domain¹⁵. This situation is expected to improve with the adoption of the amendments to the media law that predicts a formation of an online media registry.

Still, concerns persist about hidden ownership structures and potential links between media outlets (especially online media and portals) and political or business interests, which can compromise editorial independence and create unfair market competition.

Existing regulations on media ownership concentration are considered outdated by some experts and ill-suited to the digital environment, potentially hindering necessary market consolidation.

1.3 Media financing: advertising, state funds, and independence

Media financing relies heavily on advertising revenue. However, the overall advertising market (estimated at around EUR 40 million annually) is relatively small and stagnant. In the highly fragmented broadcast market, only a few national television stations capture a significant share of advertising revenue (estimated at around EUR 20 million annually for broadcasters). Major TV channels often face economic pressures related to their ownership structures given the fact that some owners are directly connected with, or close to political parties and large businesses.

While precise data is lacking, advertising in online media is believed to be increasing, while print media advertising income is declining. The MPM 2024 assesses 'Media viability' at high risk (72%), a deterioration from the previous year, citing unfavourable revenue trends (especially for local/regional media) and declining employment trends.

¹⁵ Micevski, I., & Trpevska, S. (2024, June). Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European member states and candidate countries in 2023 - Country report: The Republic of North Macedonia. European University Institute, Centre for Media Pluralism and Media Freedom.
<https://cadmus.eui.eu/server/api/core/bitstreams/ed9fd83e-1455-5e49-b698-ae3bf0999e2a/content>

State funding plays an increasingly significant role, raising serious concerns about media independence and the potential for clientelism. State funding mechanisms are often criticised as limited and non-transparent, making independent media heavily reliant on donors. While direct subsidies are limited (primarily small, declining amounts for print media distribution), indirect state funding through paid political advertising during elections and, more recently, reintroduced legality of state-funded "public interest" campaigns represent a substantial income source for many media outlets.

The budget allocated for political advertising during elections has grown significantly, reaching over EUR 10 million in the 2024 elections. This practice has led to a surge in the creation of online media outlets just before elections, as a way to access substantial funding from the state budget. A problematic overlap between politics and media emerges: political parties use state funds to finance their campaigns, creating a system that fosters clientelism, corruption, and undue influence over independent media. In such a situation, political advertising is used to influence editorial policies. Neither the media outlets nor politicians show willingness to reform this system: media benefit from the financial support, while parties gain campaign exposure without using their own resources. Major private media, in particular, engage in heavy lobbying to preserve the current political advertising rules.

This system of state funding for election advertising, particularly via media including internet portals, is unique and faces criticism for favouring larger, established parties and lacking sufficient oversight, potentially benefiting political entrepreneurs rather than genuine media outlets¹⁶. Internet portals alone absorbed an estimated €811,013 in public funds during the parliamentary elections in 2024 without counting the presidential elections held at the same time. The total funds allocated for online media for both the parliamentary and presidential elections is estimated around 2 million euros. With the amended media law, the regulation of the funding of media during election campaigns is expected to be transferred from the State Election Commission to the Agency for Audio and Audio-visual Services. The new regulator for online media campaign financing will allegedly limit the outlets that can apply for funding to only those that are part of the online media registry.

¹⁶ IFES & Metamorphosis Foundation. (2025). State Funding in North Macedonia: Making the System Fairer, Stronger, and More Transparent. https://metamorphosis.org.mk/en/izdanija_arhiva/state-funding-in-north-macedonia-making-the-system-fairer-stronger-and-more-transparent/.

The reintroduction of the possibility of running state-funded campaigns in 2024, reversing a 2017 ban, was widely criticised by media organizations and international observers as a threat to media independence and a potential gateway for political influence and corruption. Journalist associations and media policy experts were completely against lifting the ban, warning it "creates a complex financial mechanism of 'legalized' outflow of public money to all private audiovisual media, which ultimately makes them directly dependent on central and local authorities"¹⁷.

The alternative proposal of establishing an independent fund for media pluralism, aimed at supporting quality public interest journalism based on objective criteria, has been advocated by professional organisations but has not yet been adopted by the government.

Investigative, non-governmental and community media rely primarily on grants from foreign donors, which serve as a vital source of funding for public interest journalism. Without this support, it is extremely difficult for independent media to remain viable in the market. The main donors include the United States, the European Union, and several European embassies, such as those of the Netherlands, the United Kingdom, and Germany. However, international donor funding does not offer a long-term solution for the sector's sustainability, as shown by the dismantling of USAID projecting significant negative effect on these media. As one interviewee noted, "in the long run, relying on donor funding is not a sustainable solution. Media outlets need to become self-sustaining and supported by the media market. Yet, the market here is very weak, and the situation is further complicated by the influence of political and economic actors"¹⁸.

Overall, the lack of financial stability remains the primary threat to both editorial independence and media pluralism in the country.

¹⁷ Spirovski, M. (2024). North Macedonia - Indicators on the Level of Media Freedom and Journalists' Safety Index 2023. Association of Journalists of Macedonia. https://znm.org.mk/wp-content/uploads/2024/11/MK-ENG-2024_FINAL-1.pdf

¹⁸ Interview 3.

1.4 Media trust, disinformation, and media literacy

Public trust in media in North Macedonia is generally low, mirroring low trust in other state institutions¹⁹. Widespread disinformation and inconsistent professional standards are identified as key factors contributing to this decline in trust.

While television remains the most used source of information for the general population, younger generations increasingly rely on online media and social networks. However, trust levels are particularly low for online and social media, often perceived as sources of low-quality information, propaganda, and hate speech.

Citizens cite political influence on editorial policy and the prevalence of disinformation as key reasons for their lack of trust²⁰. The information space is vulnerable to foreign influence, with narratives often imported from the region (e.g. Serbia) or the Russian state-controlled media²¹. The MPM 2024 assesses 'Media literacy' at medium risk (62%), noting that media literacy skills in the population remain a high-risk area (75%) due to lack of data and insufficient integration into formal and informal education²².

Disinformation and the violation of ethical standards are particularly rampant in the online space. Social media and the digital sphere facilitate the spread of disinformation and cyberthreats, sometimes leading to attacks on journalists based on gender, ethnicity, or religion²³. The lack of regulation, transparency (impressum, authorship), and accountability contributes to this problem. While self-regulatory bodies receive an increasing number of complaints, their capacity to address the scale of the issue, especially online, is limited.

¹⁹ 2024 Rule of Law Report: Country Chapter on the rule of law situation in North Macedonia (SWD(2024) 830 final). https://commission.europa.eu/document/download/e7197a43-7f00-4eac-b02d-818ac71345f0_en?filename=61_1_58090_coun_chap_northmacedonia_nm.pdf

²⁰ Nikodinoska, V., & Chausidis, T. (2025). Deprived Media Market, Low Ethical Standards, Need for Effective Legislation: The Future of the Media in North Macedonia - Facts and Trends. SEENPM, Mediacentar Sarajevo, Macedonian Institute for Media, Peace Institute. p. 28, citing South East European Network for Professionalization of Media (2022).

²¹ Trojchanec, M., & Rizaov, G. (2024, September). *Stability Under Threat: FIMI in North Macedonia*. Metamorphosis Foundation, IRI Beacon Project. <https://metamorphosis.org.mk/wp-content/themes/metamorphosis/download.php?id=43953>

²² Micevski, I., & Trpevska, S. (2024, June). *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European member states and candidate countries in 2023 - Country report: The Republic of North Macedonia*. European University Institute, Centre for Media Pluralism and Media Freedom. p. 13-14.

²³ Association of Journalists of Macedonia (AJM). (2024). Safety Guide for Journalists. pp. 9, 26; Reporters Without Borders analysis.

Recognizing the challenge, efforts to promote media literacy have gained momentum. Media literacy has been integrated into the formal education curriculum for primary schools since 2021, and a network of civil society organisations, media, and institutions actively promotes media literacy awareness among various segments of society. These initiatives are crucial for building citizens' resilience to disinformation and fostering critical engagement with media content. However, these media literacy initiatives were mainly funded by USAID through an IREX Project, and after January 2025 they ceased existence.

RECOMMENDATIONS:

- Ensure the financial sustainability of media outlets to promote a pluralistic and independent media landscape.
- Establish clear, transparent, and accountable mechanisms for the allocation of public funding to media outlets in order to prevent risks of corruption and clientelism:
 - > Abolish the current provision in the Electoral Code that allows for paid political advertising to avoid market distortions, unfair electoral competition, unprofessional and unethical journalistic work, widespread corruption and clientelism.
 - > Prohibit the use of state-sponsored advertising in the media. If this is not feasible, define and enforce stricter criteria for the allocation of state advertising, ensuring that funding is conditional on compliance with journalistic ethical standards, significantly improve transparency in the allocation process, and require that detailed information on the distribution of public funds be made publicly accessible for civic scrutiny.
 - > Establish an independent Media Pluralism Fund to support the long-term sustainability of the media sector, promote high-quality journalism, and improve working conditions for media professionals.
- Strengthen the role of Public Service Media by safeguarding it from political interference and providing sufficient financial resources to ensure high-quality services and fair labor conditions. This would also enhance overall professionalism in the sector.
- Update media ownership and concentration regulations to include digital and online media, ensuring that legal frameworks keep pace with the evolving media landscape.
- Promote media pluralism at the local and regional levels, supporting a diversity of perspectives and topics in media coverage.

2. Media legislation and regulation

The media landscape in North Macedonia is at a critical juncture. While advancements have been made, particularly in comparison to the previous decade, significant structural, economic, and regulatory challenges persist. The following chapters will delve deeper into the specific legislative framework governing the media and the pressing issues surrounding the safety of journalists, including the growing concern of Strategic Lawsuits Against Public Participation (SLAPPs). Understanding these areas is crucial for assessing the path forward towards a truly free, independent, pluralistic, and sustainable media environment capable of supporting the country's democratic aspirations.

2.1 Key legislative framework

The primary laws governing the media sector in North Macedonia are the Law on Media (LM) and the Law on Audio and Audiovisual Media Services (LAAVMS).

The LAAVMS regulates the broadcasting sector, outlining the tasks, structure, and functioning of the national regulator (AAVMS) and the public service broadcaster (MRT).

The Law on Media, recently amended in 2025, on the other hand, addresses broader aspects, including media content and publisher responsibilities, though its scope has limitations, particularly concerning online media²⁴.

Other relevant legislation includes the Law on Copyright and Related Rights (LCRR), crucial for protecting journalists' work²⁵, the Law on Civil Liability for Insult and Defamation (LCLID), which sets the framework for defamation cases against media, and the Electoral Code, which contains controversial provisions regarding paid political advertising.

²⁴Metamorphosis Foundation. (2025). Position Paper: Evaluating North Macedonia's Media Law Reforms - A Partial Step Toward European Standards. https://metamorphosis.org.mk/en/izdanija_arhiva/evaluating-north-macedonias-media-law-reforms-a-partial-step-toward-european-standards/

²⁵Pepeljugoski, V., Manasiev, A., & Janevska, E. (2023). Journalists' rights, Freedom of Expression and Media Independence in North Macedonia - 2023 Metadata Report. Association of Journalists of Macedonia. [EN-MetaData-Report-131223-web.pdf](#)

The Law on Electronic Communications gives the right to all telephone and internet providers to retain the metadata of all their users for one year, despite the EU Data Retention Directive from 2014. The metadata includes data about when and with whom we communicate, the form of communication used, the devices involved, locations, and movements with mobile phone devices²⁶. Amendments to the Criminal Code in 2023 introduced specific protections for journalists, treating attacks against them similarly to attacks against officials²⁷.

2.2 Regulatory and self-regulatory bodies

The Agency for Audio and Audiovisual Media Services (AAAVMS) is the independent regulatory body responsible for the broadcasting sector. Its tasks include licensing broadcasters, monitoring compliance with regulations, overseeing media ownership and concentration, and maintaining registers of broadcasters and print media. With the amendments of the Media Law, AAAVMS will maintain a register of online media too.

While generally fulfilling its mandate, its financial and institutional independence face challenges due to incomplete state budget transfers and significant delays in parliamentary appointments to its Council, requiring a qualified majority often hindered by political polarization²⁸. In late January 2025, the Parliamentary Commission for Elections and Appointments proposed a list of candidates for the Council of the AAAVMS. However, the selection sparked serious concerns within the media community, as some of the proposed candidates do not meet the formal criteria required for Council membership, suggesting a clear political deal behind the appointments. On June 24, 2025, more than two thirds of the Members of Parliament voted for the new candidates for the Council.

²⁶ Danilovska Bajdevska, D. (2024). Towards Feasible Implementation of the Digital Services Act in the Western Balkans: Country Snapshot North Macedonia. Partners for Democratic Change Serbia. p. 66. https://metamorphosis.org.mk/en/izdanija_arhiva/towards-a-feasible-implementation-of-the-digital-services-act-in-the-western-balkans/

²⁷ European Commission. (2024). 2024 Rule of Law Report: Country Chapter on the rule of law situation in North Macedonia SWD (2024). https://commission.europa.eu/document/download/e7197a43-7f00-4eac-b02d-818ac71345f0_en?filename=61_1_58090_coun_chap_northmacedonia_nm.pdf

²⁸ European Commission. (2024). 2024 Rule of Law Report: Country Chapter on the rule of law situation in North Macedonia (SWD(2024). https://commission.europa.eu/document/download/e7197a43-7f00-4eac-b02d-818ac71345f0_en?filename=61_1_58090_coun_chap_northmacedonia_nm.pdf; Association of Journalists of Macedonia (AJM). (2023). Media Freedom in North Macedonia: Fragile Progress - Fact-Finding Press Freedom Mission Report. <https://znm.org.mk/wp-content/uploads/2023/10/EN-Fact-Finding-PFM-Report-251023-web.pdf>

Before the vote happened, one of our interlocutors noted: “I would say that the shortlisted candidates are quite scandalous, as some of them fail to meet even the basic legal requirements. They do not inspire confidence among us (the media community, *ed. note*) that they are the right individuals to serve on the managing board of an independent media regulatory body. If these individuals are formally appointed by Parliament, political influence will be assured, leading to a decline in media independence”²⁹.

In addition, amendments to the LAAVMS in February 2024 were criticized for undermining the Agency’s role as a regulator and narrowing its mandate by removing its authority to decide on license renewals based on contributions to program diversity and pluralism. As one interlocutor pointed out: “Under the previous provision, the media regulator was required to assess a broadcaster’s contribution to the overall pluralistic media landscape before deciding on licence renewal. Now, that requirement has been completely removed. Simply put, the regulator is now obliged to renew licences and can only refuse renewal in very specific cases, such as excessive hate speech or more than three violations of minors’ rights”³⁰. This amendment significantly weakens the role of the media regulator in safeguarding media pluralism.

Self-regulation is primarily managed by the Council of Media Ethics of Macedonia (CMEM) and the Association of Journalists of Macedonia (AJM). CMEM, a voluntary body representing various media outlets, handles complaints regarding breaches of the Journalists’ Code of Ethics. It has seen a rise in complaints, especially concerning online media, hate speech, accuracy, and verification. However, CMEM itself has reportedly faced pressure from political and economic actors³¹. AJM is a highly professional association advocating for journalists’ rights, monitoring attacks, providing legal aid, and pushing for reforms. The Independent Union of Journalists and Media Workers (SSNM) also plays a role in advocating for labour rights.

²⁹ Interview 5.

³⁰ Interview 1.

³¹ European Commission. (2024). 2024 Rule of Law Report: Country Chapter on the rule of law situation in North Macedonia (SWD(2024)). https://commission.europa.eu/document/download/e7197a43-7f00-4eac-b02d-818ac71345f0_en?filename=61_1_58090_coun_chap_northmacedonia_nm.pdf

2.3 The online media regulatory gap

A significant deficiency in the legal framework was the exclusion of the online media from the primary definition of "media" in the Law on Media. The definition was focused on traditional formats (TV, radio, print), leaving the rapidly expanding digital sphere, including news portals and other platforms, largely outside the scope of media-specific regulation. This used to create a "grey zone" characterised by:

- **Lack of transparency:** No legal requirement for online media to disclose ownership structures or impressum information.
- **Inconsistent status:** Online media are treated as media for certain purposes (e.g., allocation of state funds for election advertising) but lack legal recognition in others (e.g., court proceedings, application of media-specific ethical standards enforcement).
- **Professional standards:** Difficulty in enforcing professional and ethical standards, contributing to the spread of disinformation and hate speech online. While CMEM maintains a voluntary register ("Promedia") for professional online media, adherence to ethical decisions by non-members or even members are often lacking³².

Recent amendments to the Law on Media aim to address this by incorporating online media and establishing a Register of Online Media under AAVMS oversight. However, critics argue these amendments are insufficient, fail to fully align with European standards like the European Media Freedom Act (EMFA), and do not adequately address issues like editorial independence, protection from surveillance, or ownership concentration in the digital realm³³. The requirement for a minimum number of employees for registration, though revised after criticism, still raises concerns about its impact on smaller, local, and non-profit online media.

The rulebook and other supporting acts are expected to be finalized and the regulation implemented by 2025, ahead of the local elections in October.

³² Danilovska Bajdevska, D. (2024). Towards Feasible Implementation of the Digital Services Act in the Western Balkans: Country Snapshot North Macedonia. Partners for Democratic Change Serbia. https://metamorphosis.org.mk/en/izdanija_arhiva/towards-a-feasible-implementation-of-the-digital-services-act-in-the-western-balkans/

³³ Metamorphosis Foundation. (2025). Position Paper: Evaluating North Macedonia's Media Law Reforms - A Partial Step Toward European Standards. https://metamorphosis.org.mk/en/izdanija_arhiva/evaluating-north-macedonias-media-law-reforms-a-partial-step-toward-european-standards/

2.4 State advertising and election campaign regulation

Regulations concerning state funding and political advertising are highly contentious. Article 102 of the LAAVMS previously banned state advertising in private broadcast media, a measure introduced in 2017 to curb clientelism. However, amendments passed in 2024 reintroduced state-funded "public interest" campaigns, allowing state and local authorities to allocate 0.1% of their budgets for this purpose³⁴. This move was heavily criticized by media organizations and the EU Rule of Law report as a potential threat to media independence and a risk for political misuse, despite proposed safeguards like a bipartisan parliamentary committee for campaign selection. The Media Pluralism Monitor 2024 notes high risks attached to the distribution of state advertising due to past misuse and the potential for renewed clientelism.

The Electoral Code allows participants in election campaigns to use funds from the state budget for paid political advertising in broadcasters, print media, and online media (Article 76-e)³⁵. This model is unique to North Macedonia and has been criticized for:

- **Distorting the market:** Providing significant revenue streams, particularly benefiting larger parties and established media, potentially creating dependency.
- **Lack of fairness:** The distribution mechanism favors larger parliamentary parties, disadvantaging smaller parties and independent candidates. This systemic imbalance is noted by international observers like ODIHR³⁶.
- **Stimulating unprofessional online media:** The provision encourages the creation of online portals primarily to capture election advertising funds, often without adhering to transparency or professional standards.
- **Potential for corruption:** The State Commission for Prevention of Corruption (SCPC) identified the model itself as carrying risks.

³⁴ European Commission. (2024). 2024 Rule of Law Report: Country Chapter on the rule of law situation in North Macedonia (SWD(2024) 830 final). https://commission.europa.eu/document/download/e7197a43-7f00-4eac-b02d-818ac71345f0_en?filename=61_1_58090_coun_chap_northmacedonia_nm.pdf

³⁵ Pepeljugin, V., Manasiev, A., & Janevska, E. (2023). Journalists' rights, Freedom of Expression and Media Independence in North Macedonia - 2023 Metadata Report. Association of Journalists of Macedonia. <https://znm.org.mk/wp-content/uploads/2024/01/EN-MetaData-Report-131223-web.pdf>

Interview 1.

³⁶ OSCE Office for Democratic Institutions and Human Rights. North Macedonia, Presidential and Early Parliamentary Elections, 24 April and 8 May 2024: Final Report <https://www.osce.org/odihr/elections/north-macedonia/576648>

2.5 Alignment with EU Standards and Ongoing Reforms

North Macedonia is in the process of aligning its media legislation with the EU acquis, particularly concerning the Audiovisual Media Services Directive (AVMSD). Amendments to the LAAVMS in 2023 aimed to further this alignment. However, the broader reform process, including the development of a new comprehensive Media Law - which was reportedly drafted with EU expert help but not proposed by the government - and alignment with the European Media Freedom Act (EMFA) and the Digital Services Act (DSA), appears fragmented and slow.

The Metamorphosis Foundation's position paper highlights that current amendments to the Media Law only partially harmonise with EMFA, lacking crucial provisions on media pluralism assessment (Art. 22), journalists' rights and editorial independence (Art. 6.3), and protection from surveillance (Art. 4)³⁷. There is a recognized need for a more holistic legislative approach to ensure coherence between media law, digital regulation, and anti-SLAPP measures.

³⁷ Metamorphosis Foundation. (2025). Position Paper: Evaluating North Macedonia's Media Law Reforms - A Partial Step Toward European Standards. https://metamorphosis.org.mk/en/izdanija_arhiva/evaluating-north-macedonias-media-law-reforms-a-partial-step-toward-european-standards/

The EU integration process

According to some media experts and professionals that we have interviewed for this report, the EU integration process has played a relatively weak role in advancing media freedom standards in North Macedonia, as illustrated by the disappointing experience of the 2023 media reform process³⁸. As one interviewee explained, “we expected the European Commission to support the expert team’s position, but they didn’t pressure the ministry to publish any analysis or documentation”³⁹.

This reflects a broader issue: in key moments, the perception is that the EU tends to avoid taking a clear stance or applying pressure on national authorities to ensure transparency in law drafting and adoption. As the same interlocutor noted, “they don’t want to take a side”, allowing the government to maintain a façade of transparency while engaging in a box-ticking approach to reforms.

Another interviewee added that media issues appear to be a lower priority for EU officials compared to other pressing topics. Nonetheless, international pressure remains crucial. As she emphasized, “foreigners need to be more vocal. If it comes from international voices, it has a bigger leverage at the national level”⁴⁰. Without such backing, domestic actors have limited influence.

Moreover, our interlocutors lamented the fact that the EU Commission’s annual progress reports have largely repeated the same observations in recent years, further diminishing their impact. Politicians often use the fact that the media situation in North Macedonia is not as dire as in some other candidate or even EU member states as an excuse to avoid addressing structural problems. As a result, the EU integration process offers limited leverage: it is currently not perceived as a driver of real progress. Even on issues such as the electoral code and political advertising, the EU may mention concerns in its reports, but rarely applies meaningful pressure. As an interlocutor bluntly said, “why should we make reforms now when we are not going to advance anyway?”⁴¹.

³⁸ RESIS, EU for Freedom of Expression – North Macedonia Workshop on media reforms October 12-13 2023. “Towards a sustainable, diverse and safe media sector: supporting democracy and Pluralism and serving the citizen”, https://www.resis.mk/images/Workshops_Summary_ENG.pdf

³⁹ Interview 1.

⁴⁰ Interview 4.

⁴¹ Interview 6.

2.5.1 North Macedonia's Media Legislation and EU's Digital Services Act

The integration of North Macedonia into the EU's digital regulatory framework represents a significant step toward enhancing digital rights and online governance. A crucial legislative milestone in this process is the Digital Services Act (DSA), a robust European framework aiming to create safer online environments, ensure transparency, and protect fundamental rights in digital spaces. North Macedonia's media legislation must now align with these EU standards, a process with substantial implications for media freedom, digital safety, and regulatory clarity.

The existing framework provides a foundational alignment with the EU acquis, focusing primarily on content regulation and broadcaster licensing. However, it lacks explicit provisions for digital intermediaries, accountability for very large online platforms (VLOPs), and measures addressing systemic risks such as disinformation and hate speech, critical elements introduced by the DSA.

A central step is to establish the role of the Digital Service Coordinator (DSC), a designated national authority responsible for oversight, enforcement, and coordination related to digital services regulation.

Recent research underlines that effective harmonization must prioritize transparency in online advertising, mechanisms for reporting and removing illegal content, and protections against abusive content moderation practices. North Macedonia must also ensure robust risk management procedures by VLOPs operating within its jurisdiction, mirroring DSA mandates. This process requires legislative amendments enhancing accountability, transparency, and respect for users' fundamental rights online.

A regional study emphasizes the need for multi-stakeholder engagement, suggesting that civil society organizations (CSOs) play a vital advisory role. Incorporating CSOs into regulatory frameworks promotes trust, accountability, and a comprehensive approach to digital governance, aligning with European best practices⁴².

⁴² Danilovska-Bajdevska, D., Wright, E., Culahovic, M., Reçi, M., Tosić, M., Nikčević, S., & Sahatqija, T. (2024). Towards a Feasible Implementation of the Digital Services Act in the Western Balkans. Partners for Democratic Change Serbia. https://metamorphosis.org.mk/en/izdanija_arhiva/towards-a-feasible-implementation-of-the-digital-services-act-in-the-western-balkans/

Despite the legislative groundwork, North Macedonia faces several challenges in implementing DSA-related reforms. Institutional readiness is a primary concern, especially regarding technical expertise, capacity, and independence of potential DSC entities. The regulatory bodies such as the Agency for Audio and Audiovisual Services (AAVMS) and the Agency for Electronic Communications (AEC) are potential candidates for assuming DSC roles. However, both bodies require capacity-building measures to manage extensive new responsibilities effectively.

Moreover, political influence over regulatory authorities remains a significant concern. For successful DSA harmonization, North Macedonia must ensure regulatory independence, safeguarded through legal frameworks and adequate resourcing, reflecting broader EU concerns highlighted by the European Commission's regular progress reports.

Harmonizing North Macedonia's media legislation with the EU's Digital Services Act represents a critical juncture for digital governance and fundamental rights protection. While existing legislative frameworks provide a foundational alignment, substantial reforms remain necessary, particularly in establishing an effective Digital Service Coordinator and enhancing regulatory transparency and accountability. Addressing these challenges through targeted investments, clear legal safeguards, and inclusive multi-stakeholder engagement will position North Macedonia firmly within the EU's digital governance landscape, fostering a safer, more transparent, and rights-based digital environment.

2.6 Copyright Protection

The Law on Copyright and Related Rights (LCRR) provides the legal basis for protecting the work of journalists and media workers. It defines authorship, co-authorship, and rights related to works created under employment contracts or commissions. However, enforcement, particularly in the digital environment, remains challenging. Issues include unauthorized use of content ("copy-paste journalism"), lack of awareness among journalists about their rights (e.g., regarding compensation for uses beyond initial employment terms), and the need for collective management organisations to effectively represent journalists' interests. The LCRR has been changed to align with several EU directives (like 2019/790 on the Digital Single Market and 2019/789 on online transmissions), which aim to modernize protection, regulate online service provider liability, and ensure fair remuneration for authors.

Initiated by these changes⁴³ in the Law on Copyright, the largest news aggregator in the country, Time.mk, officially requested the listed news sites to sign a contract that gives non-exclusive, irrevocable, and royalty-free license to aggregate and use journalistic content. This started a vibrant debate resulting in more than 40, mostly professional and mainstream news sites exiting the aggregator. There are ongoing negotiations between the owner of the news aggregator and the news sites on how to resolve the issue. This news aggregator is a dominant source of traffic for all news sites it lists, while at the same time generating substantial ad revenue without producing original content.

⁴³ Law on Amendments and Supplements to the Law on Copyright and Related Rights (2025), <https://avmu.mk/wp-content/uploads/2025/05/%D0%98%D0%B7%D0%BC%D0%B5%D0%BD%D0%B8-%D0%B8-%D0%B4%D0%BE%D0%BF%D0%BE%D0%BB%D0%BD%D1%83%D0%B2%D0%B0%D1%9A%D0%B5-%D0%BD%D0%B0-%D0%97%D0%90%D0%9F%D0%A1%D0%9F-2025.pdf>

RECOMMENDATIONS:

- Ensure the effective functioning of the media regulatory authority by securing timely budget allocations and implementing transparent, merit-based procedures for appointing Council members. These appointments must be based on clear and objective criteria to safeguard the independence, efficiency, and impartiality of the body.
- Strengthen the regulator's position as an independent body, reversing the decision to appoint members of the Council as well as dropping the amendments that limit its decision power on license renewal.
- Initiate a comprehensive reform of the Media Law to address the evolving media landscape, including the digital sphere. The reform process should be inclusive and participatory, involving all relevant stakeholders, including civil society, professional organisations and media experts. The law should:
 - > Guarantee transparency of traditional and digital/online media ownership;
 - > Ensure the implementation of professional and ethical journalism standards by the entire sector;
 - > Align the legal framework with the Audiovisual Media Services Directive (AVMSD), the European Media Freedom Act (EMFA), and the Digital Services Act (DSA).
 - Strengthen the digital regulatory framework to align fully with the DSA, focusing on:
 - > The regulation of digital intermediaries and Very Large Online Platforms (VLOPs); systemic risks such as misinformation, hate speech, and opaque online advertising; transparency in content moderation and the protection of users' fundamental rights.
 - > Establish a Digital Services Coordinator (DSC) to oversee enforcement of the regulation, with adequate accountability mechanisms and legal safeguards to ensure its independence and minimize political interference.
 - > Foster ongoing consultation processes involving CSOs, industry representatives, and academia, ensuring a balanced and comprehensive regulatory approach.
 - > Invest in extensive training for regulatory authorities to ensure they can manage new responsibilities related to digital platforms effectively.
 - > Leverage existing regional mechanisms for cooperation and information sharing, promoting uniform standards and practices across the Western Balkans.
- Ensure the effective enforcement of copyright and related rights legislation, safeguarding the intellectual property and professional interests of journalists and media professionals.

3. Safety of journalists

3.1 Overview of safety environment

The general environment for journalists' safety in North Macedonia is considered relatively secure compared to some other countries in the Western Balkans, and physical attacks have decreased.

The Reporters Without Borders 2025 World Press Freedom Index Report for North Macedonia states that several incidents have diminished journalists' sense of safety, including arson attacks on their property and cases of police harassment. On one hand, special prosecutors were appointed for addressing attacks on journalists, but on the other the Report adds that journalists covering prosecutors face significant pressure⁴⁴.

According to AJM's register, there were 7 attacks/threats in 2022, 5 in 2023, down to 4 in 2024 from much higher numbers from years before but still indicating ongoing risks⁴⁵. Threats, intimidation, and various forms of pressure persist, creating a climate that can hinder free and critical reporting. While severe physical attacks are rare, incidents do occur, and online harassment, particularly targeting female journalists, is a growing concern. The precarious socio-economic status of many journalists further exacerbates safety concerns, potentially leading to self-censorship.

⁴⁴ Reporters Without Borders. (2025). 2025 World Press Freedom Index. <https://rsf.org/en/country/north-macedonia>

⁴⁵ Association of Journalists of Macedonia (AJM). Register of cases of violation of journalists' rights over the years <https://znm.org.mk/povreda-na-novinari/>

3.2 Physical and psychological threats

Physical attacks against journalists and media workers, while less frequent than in the past, still occur, particularly against those engaged in investigative reporting or covering protests and high-risk events. These can range from pushing and obstructing work to direct physical violence causing injury and damage to equipment.

Psychological attacks, including verbal threats of violence, intimidation, and smear campaigns, are increasingly prevalent, especially online. These threats can be direct ("offline") or disseminated through social media, emails, and other digital platforms. Female journalists are disproportionately targeted with gender-based hate speech, sexism, and misogyny, with online threats against them being particularly numerous in recent years. Such attacks can cause significant fear, anxiety, and psychological trauma, impacting journalists' well-being and ability to work⁴⁶.

3.3 Online harassment and digital security

The digital sphere has become a primary arena for threats against journalists. Online harassment includes hate speech, threats of violence, stalking, spreading disinformation about journalists, and attempts to discredit their work. The anonymity afforded by some online platforms can embolden attackers. Journalists require adequate digital security knowledge and tools to protect themselves, their sources, and their data. Newsrooms and professional associations play a role in providing support and training for digital safety⁴⁷. The Ministry of Interior has a dedicated Department for Cybercrime (DCC) and designated a liaison officer to handle digital threats against journalists⁴⁸. Despite these mechanisms, the indicator for efficient protection from online harassment saw only a slight improvement in 2023 (score 3.51 vs 3.46 in 2022), suggesting ongoing challenges⁴⁹.

⁴⁶ Association of Journalists of Macedonia (AJM). Register of cases of violation of journalists' rights over the years <https://znm.org.mk/povreda-na-novinari/>

⁴⁷ Association of Journalists of Macedonia (AJM). (2024). Safety Guide for Journalists. https://znm.org.mk/wp-content/uploads/2024/08/ENG_ZNM_Priracnik-za-bezbednost-na-novinari-FINAL.pdf

⁴⁸ European Commission. (2024). 2024 Rule of Law Report: Country Chapter on the rule of law situation in North Macedonia (SWD (2024)) https://commission.europa.eu/document/download/e7197a43-7f00-4eac-b02d-818ac71345f0_en?filename=61_1_58090_coun_chap_northmacedonia_nm.pdf

⁴⁹ Spirovski, M. (2024). North Macedonia - Indicators on the Level of Media Freedom and Journalists' Safety Index 2023. Association of Journalists of Macedonia. https://znm.org.mk/wp-content/uploads/2024/11/MK-ENG-2024_FINAL-1.pdf

3.4 Legal framework and institutional response

Significant steps have been taken to improve the legal protection of journalists. The Criminal Code amendments of February 2023 are a key development:

- **Attacks as official assault:** Attacks on journalists performing their duties are now treated similarly to attacks on officials (e.g., police officers, judges), allowing the Public Prosecutor's Office (PPO) to prosecute *ex officio*. This applies to acts committed against a journalist defined as "a person who professionally performs functions, duties or works of public, i.e. general interest"⁵⁰.
- **Specific offences:** Qualifying forms with stricter penalties were introduced for crimes like murder (Art. 123), coercion (Art. 139), threatening safety (Art. 144), and preventing an official from performing an official action (Art. 382) when committed against a journalist.
- **Stalking:** The criminalization of stalking (Art. 144a), including online forms, offers another avenue for protection, particularly relevant given the prevalence of online harassment.
- **Other relevant offences:** While not specifically protecting journalists *as officials*, other articles like Bodily Injury (Art. 130/131), Threatening with a Dangerous Weapon (Art. 133), Violence (Art. 386), and Causing National/Racial/Religious Hatred (Art. 319) can be applied when journalists are victims.

The Law on Civil Liability for Insult and Defamation (LCLID) was amended in late 2022. In addition to decriminalising slander and defamation, the amendment significantly reduced the maximum amounts payable for non-pecuniary damages in defamation lawsuits lost by journalists or media outlets (to €400 for journalists, €2000 for editors, €5000 for legal entities⁵¹). This aims to limit the chilling effect of potentially ruinous lawsuits.

Institutional responses have also improved:

- **Dedicated prosecutors:** Special public prosecutors have been appointed in Skopje and three other regions (Bitola, Tetovo, Stip) to coordinate and monitor cases related to journalists' safety, facilitating communication and tracking of proceedings.

⁵⁰ Association of Journalists of Macedonia (AJM). (2024). Safety Guide for Journalists. pp. 21-22, citing Criminal Code Art. 122(9).

⁵¹ Alexov, Z., & Hadji-Zafirova, Z. (2023). ANALYSIS - How to ensure more effective protection from strategic lawsuits against public participation (SLAPPS)?. Association of Journalists of Macedonia, UNESCO GMDF. https://znm.org.mk/wp-content/uploads/2024/02/ENG_Analiza-SLAPP-02-12-1.pdf

- **Ministry of Interior (Moi):** Cooperation between the Moi and AJM has been formalized through Memorandums and Protocols (e.g., the Protocol for Online Safety of Journalists), aiming for faster responses to threats. The Department for Internal Control, Criminal Investigations and Professional Standards (DICCIPS) handles complaints against police officers.
- **Reporting mechanisms:** Journalists can report threats to the local police, the Moi's Cybercrime Department (cybercrime@moi.gov.mk), or the relevant PPO. Early reporting and documentation (screenshots, URLs) are crucial.

Despite progress, challenges remain. Investigations and court proceedings can be slow, and impunity for past attacks persists, with less than 10% of violations registered by AJM over five years resulting in court resolution⁵². The effectiveness of the new legal provisions depends on consistent application by police, prosecutors, and courts.

3.5 Working conditions and economic pressures

The precarious socio-economic status of journalists is intrinsically linked to their safety and independence. Key issues include:

- **Low salaries:** Often below the national average, making journalists financially vulnerable. Over half (55%) earn below the average wage⁵³.
- **Insecure contracts:** Widespread use of fixed-term, freelance, or even no contracts, especially in online media⁵⁴.
- **Poor working conditions:** Long hours (28% work more than legally permitted), unpaid overtime, lack of benefits (like injury insurance), disregard for labour rights (e.g., right to leave, days off), and high stress levels (55% often exposed to stress) are common⁵⁵.
- **Workplace harassment:** Including mobbing and gender-based harassment, contributing to stress and burnout⁵⁶.

⁵² Association of Journalists of Macedonia (AJM). (2023). Media Freedom in North Macedonia: Fragile Progress - Fact-Finding Press Freedom Mission Report. p. 9.

⁵³ Professional status and labor rights of journalists and media workers), SSNM; RESIS, March 2024 <https://resis.mk/images/about-us/PDF/working-conditions-in-the-media-sector.pdf>

⁵⁴ Professional status and labor rights of journalists and media workers), SSNM; RESIS, March 2024 <https://resis.mk/images/about-us/PDF/working-conditions-in-the-media-sector.pdf>

⁵⁵ Professional status and labor rights of journalists and media workers), SSNM; RESIS, March 2024 <https://resis.mk/images/about-us/PDF/working-conditions-in-the-media-sector.pdf>

⁵⁶ Association of Journalists of Macedonia (AJM). (2024). *Safety Guide for Journalists*. https://znm.org.mk/wp-content/uploads/2024/08/ENG_ZNM_Priracnik-za-bezbednost-na-novinari-FINAL.pdf

These conditions make journalists more susceptible to pressure from owners, politicians, and business interests, fostering self-censorship and undermining ethical standards. The lack of collective agreements in the private media sector hinders efforts to improve labour rights⁵⁷.

3.6 Strategic Lawsuits Against Public Participation (SLAPPs)

SLAPPs represent a significant legal threat, particularly to investigative journalists and media outlets critical of powerful entities. They constitute a form of legal risk impacting journalists' safety and freedom.

SLAPPs are lawsuits initiated not primarily to seek justice or compensation for a legitimate grievance, but rather to intimidate, silence, harass, and financially drain critics (journalists, activists, NGOs) who speak out on matters of public interest.

While North Macedonia lacks specific anti-SLAPP legislation, the phenomenon exists and is recognized as a challenge. Defamation lawsuits are the most common vehicle⁵⁸. Although the 2022 amendments to the LCLID reduced potential damages, potentially mitigating one aspect of SLAPPs, they do not offer specific procedural safeguards like early dismissal mechanisms. The MPM 2024 assesses the risk related to SLAPPs as high, noting the lack of specific anti-SLAPP legislation⁵⁹.

Prevalence: While precise numbers are hard to track due to the lack of specific identification, analyses suggest an increase in concerning lawsuits. After years of decline, defamation cases against journalists/media rose to 54 in 2022, before falling again to 19 active cases by the end of 2023. AJM registered six potential SLAPP cases in 2023. Lawyers and journalists report facing lawsuits from public officials and business figures aimed at hindering investigative work, citing examples like cases against the Investigative Reporting Lab (IRL)⁶⁰.

⁵⁷ Association of Journalists of Macedonia (AJM). (2023). Media Freedom in North Macedonia: Fragile Progress - Fact-Finding Press Freedom Mission Report. <https://www.ecpmf.eu/wp-content/uploads/2023/11/EN-Fact-Finding-PFM-Report-251023-web-1.pdf>

⁵⁸ Alexov, Z., & Hadji-Zafirova, Z. (2023). ANALYSIS - How to ensure more effective protection from strategic lawsuits against public participation (SLAPPs)?. Association of Journalists of Macedonia, UNESCO GMDF. https://znm.org.mk/wp-content/uploads/2024/02/ENG_Analiza-SLAPP-02-12-1.pdf

⁵⁹ Micevski, I., & Trpevska, S. (2024, June). Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European member states and candidate countries in 2023 - Country report: The Republic of North Macedonia. European University Institute, Centre for Media Pluralism and Media Freedom. <https://cadmus.eui.eu/server/api/core/bitstreams/ed9fd83e-1455-5e49-b698-ae3bf0999e2a/content>

⁶⁰ One notable defamation judgment widely characterised as a SLAPP case was registered concerning investigative journalists of a not-for-profit media organisation. See: Association of Journalists of Macedonia (2023), How to ensure more effective protection from strategic lawsuits against public participations (SLAPPs)?, 2024 Media Pluralism Monitor, country report for North Macedonia, Media Freedom Rapid Response (2023), Judge recommends closing the investigative media outlet Investigative Reporting Laboratory (IRL) and Media Freedom Rapid Response (2023), Judge Jovanka Spirovska Paneva rules against IRL in defamation case.

The indicator assessing whether defamation laws create a chilling effect slightly worsened in 2023 (score 4.22 vs 4.34 in 2022), partly due to concerning court rulings like the one against IRL⁶¹.

- **Legal framework:** Protection currently relies on general provisions within the LCLID (exceptions to liability for defamation/insult, especially concerning public interest and public figures), the Law on Civil Procedure (potential for examining legal interest, though limited), and the application of ECHR Article 10 principles. The Metamorphosis Foundation notes the lack of specific anti-SLAPP provisions in recent media law reform proposals⁶².
- **Impact:** SLAPPs drain financial resources (legal fees), consume time, cause significant psychological stress, and can lead to self-censorship⁶³.

⁶¹ Spirovski, M. (2024). North Macedonia - Indicators on the Level of Media Freedom and Journalists' Safety Index 2023. Association of Journalists of Macedonia. p. 45.

⁶² Evaluating North Macedonia's Media Law Reforms—A Partial Step Toward European Standards 2025. Metamorphosis Foundation <https://metamorphosis.org.mk/wp-content/themes/metamorphosis/download.php?id=45569>

⁶³ Alexov, Z., & Hadji-Zafirova, Z. (2023). ANALYSIS - How to ensure more effective protection from strategic lawsuits against public participation (SLAPPS)?. Association of Journalists of Macedonia, UNESCO GMDF. https://znm.org.mk/wp-content/uploads/2024/02/ENG_Analiza-SLAPP-02-12-1.pdf

RECOMMENDATIONS:

- Strengthen the protection and the working conditions of journalists:
 - > Recognize online harassment, including verbal intimidation and smear campaigns on digital platforms, as serious threats to press freedom, paying special attention to gender-based hate speech and harassment targeting female journalists.
 - > Provide effective tools to protect journalists, their sources, and their data, especially in the digital environment, including by strengthening the Department for Cybercrime (DCC) and enhancing the role of the designated liaison officer to support journalists facing digital threats.
 - > Foster stronger collaboration between law enforcement, professional associations, and newsrooms to ensure timely responses to threats and harassment.
 - > Guarantee the effective application of legal protections of journalists and media professionals by law enforcement authorities and improve the investigation and prosecution of crimes against journalists to break the cycle of impunity.
 - > Promote collective agreements in the private media sector to ensure adequate working conditions, improving salaries, setting minimum wages thresholds, supporting contractual security.
 - > Regulate digital platforms and online media to ensure they meet the same labour standards as traditional outlets.
- Introduce specific anti-SLAPP legislation, aligned with EU standards, in particular the EU anti-SLAPP directive and recommendations, and Council of Europe recommendations.
- Improve the monitoring and data collection of SLAPPs and other legal threats against journalists, and ensure timely and appropriate follow-up by the competent authorities in cases involving abusive legal actions.

4. Disinformation and foreign influence

4.1 The disinformation landscape

Disinformation poses a significant threat to North Macedonia's media environment and democratic processes. It is often intertwined with political polarization, ethnic tensions, and external influences, contributing to a deeply divided society, low trust in the institutions as well as in the media. The largely unregulated online sphere, particularly social media platforms and numerous mainly fragmented and ideologically divided news sites operating with low professional standards and transparency, serves as a fertile ground for the rapid spread of false and misleading narratives. The race to be the first to publish to get as many pageviews as possible, opens the door for disinformation narratives to enter the mainstream. This vulnerability is exacerbated by a lack of established mechanisms to effectively counter hate speech, fake news, and disinformation on online platforms, aside from some self-regulation efforts and fact-checking on Facebook.

The main player in countering Foreign Information Manipulation (FIMI) and Interference is the civil society sector. Spearheaded by the Metamorphosis Foundation, several civil society organizations have started an initiative to push for a more strategic approach in countering FIMI and drafted a set of recommendations⁶⁴ for all relevant stakeholders in the country. Although the previous government formally accepted the recommendations and stated it is willing to work on creating a strategy for countering FIMI, not much has been done. Since the summer of 2024, the new government appears to be even less interested in this issue. Nevertheless, their official program included several references to tackling disinformation as one of their stated goals.

⁶⁴ Metamorphosis Foundation (2023) Recommendations for Joint Action for Building Societal Resilience Towards Malign Influences of Disinformation https://metamorphosis.org.mk/en/izdanija_arhiva/recommendations-for-joint-action-for-building-societal-resilience-towards-malign-influences-of-disinformation/

4.2 Key narratives and Foreign Information Manipulation (FIMI)

The disinformation narratives that are spread in North Macedonia are not limited to domestic issues only. They include different issues such as the war in Ukraine, the conflict in the Middle East, anti-vaxxing narratives, gender, LGBTQ+ narratives and prominent conspiracy theories. The whole spectrum is present.

Some of the narratives spread recently evolve around:

- **EU integration and national identity:** Disinformation campaigns frequently portray EU integration as a threat to Macedonian national identity, language, and culture, particularly focusing on historical disputes with neighbouring countries like Bulgaria and Greece. The requirement to include the Bulgarian minority in the Constitution as a condition for advancing EU talks is a major flashpoint, exploited to sow distrust towards the EU and fuel nationalist sentiments.
- **Inter-ethnic relations:** FIMI tactics often aim to undermine the Ohrid Framework Agreement - which ended the 2001 conflict - and exacerbate tensions between ethnic Macedonians and ethnic Albanians. Narratives suggest that ethnic Albanians disproportionately benefit from EU integration at the expense of Macedonians, risking instability. Anti-Albanian sentiment has been observed in political campaigns pushed by openly pro-Russian political parties. In the upcoming local elections, it is expected that the inter-ethnic narrative will be used again.
- **Geopolitical narratives:** Pro-Kremlin narratives are disseminated, particularly regarding the war in Ukraine, portraying NATO negatively and questioning North Macedonia's alignment with Western institutions. These often enter the media space via Serbian media outlets or are amplified by local pro-Russian actors and political parties like Levica (The Left). Other narratives target UN resolutions (e.g., Srebrenica) or amplify anti-Western sentiment regarding global conflicts.
- **Anti-vaccination movements:** Anti-vaxxing narratives have spread widely through social media and certain media outlets, fostering distrust in vaccines and public health institutions, especially during the COVID-19 pandemic. These claims have been debunked, yet they continue to attract significant attention, including those alleging that vaccines alter our DNA or contain microchips. These narratives have led to decreased public trust in immunization campaigns, contributing to the resurgence of diseases like whooping cough, which had previously been nearly eradicated.

- **Anti-gender movements:** Anti-gender narratives have gained increased visibility in the country's public discourse. Mainstream media often amplify messaging from conservative and religious organizations without applying critical scrutiny, contributing to the spread of misinformation related to gender equality. These narratives are frequently linked to fears of losing the traditional family values and are used to mobilize opposition to legislation that protects gender equality and LGBTQ+ rights.

4.3 Actors and channels

Disinformation is spread through various channels:

- **Online media:** Many operate with low professional standards and lack transparency, readily republishing unverified content or biased narratives, often translated from Serbian or Russian sources.
- **Social media:** Platforms like Facebook, X, TikTok, and YouTube are major conduits for disinformation, hate speech, and coordinated influence campaigns, often amplified by bots or sock puppet accounts. Regulation and content moderation are weak, especially on platforms other than Facebook/Instagram (which have third-party fact-checking).
- **Political actors:** Some domestic political parties and figures employ nationalist, populist, or divisive rhetoric that aligns with or amplifies disinformation narratives, particularly during election campaigns.
- **Foreign embassies and state-controlled media:** Notably, the Russian embassy is active on social media, and Russian state media (like Sputnik and RT in Serbian) serve as sources for local outlets.
- **Domestic influencers:** Certain online commentators and influencers contribute to the spread of polarizing or misleading content.

4.4 Institutional response and Challenges

The institutional response to disinformation and FIMI has been slow and fragmented:

- **Government initiatives:** While a "Plan for Resolute Action against the Spreading of Disinformation" was proposed in 2019 and a "Strategy for Building Resilience and Tackling Hybrid Threats (2021-2025)" exists, implementation has been limited and lacked inclusivity. A 2023 Memorandum of Understanding with the U.S. to counter disinformation was signed, but its implementation status under the new government is unclear. The current government program mentions an "effective fight against disinformation" but lacks specifics.
- **Parliamentary inaction:** The Assembly has been largely inactive, with no specific committee clearly mandated to oversee FIMI or disinformation policies, despite several committees having relevant portfolios.
- **Legislation:** There is no specific legislation targeting FIMI or disinformation comprehensively. Existing media laws (LAAVMS, LM) have limited scope, especially online. Alignment with the EU's Digital Services Act (DSA), which includes measures against disinformation on large platforms, is pending and faces institutional capacity challenges.
- **Civil society leadership:** CSOs, like the Metamorphosis Foundation, have been at the forefront, conducting fact-checking, research, media literacy projects, and advocating for a systemic, whole-society approach. Recommendations developed through inclusive processes have been presented to the government.

4.5 Cybersecurity and future threats

Cybersecurity remains a significant challenge, with the national strategy considered underdeveloped and lacking focus on emerging threats like Artificial Intelligence (AI)⁶⁵. While sophisticated AI-generated disinformation (e.g., deep fakes targeting local figures) has not been widespread yet, likely due to language and data limitations, the potential for future exploitation exists as technology evolves. The country's vulnerability to cyberattacks further compounds the risks associated with information manipulation.

⁶⁵ Trojachanec, M., & Rizaov, G. (2024, September). Stability Under Threat: FIMI in North Macedonia. Metamorphosis Foundation, IRI Beacon Project. p. 14.

RECOMMENDATIONS:

- Set up robust systems to combat hate speech, fake news, and disinformation on online platforms, including the development of adequate and transparent content moderation practice.
 - Enact specific legislation targeting Foreign Information Manipulation and Interference (FIMI) and disinformation, in alignment with EU standards, such as the Digital Services Act (DSA).
- > Promote structured collaboration with civil society to develop a strategic and comprehensive response to disinformation.
- Guarantee the effective implementation of current initiatives, including the Plan for Resolute Action Against the Spreading of Disinformation and the Strategy for Building Resilience and Tackling Hybrid Threats (2021–2025).
 - Update and expand the national cybersecurity strategy to reflect societal changes and emerging risks, including those linked to Artificial Intelligence and its potential role in spreading disinformation.

List of interviews:

- Institute for Social Development Research RESIS
- Media Development Centre
- Macedonian Institute for Media
- Eurothink
- Association of Journalists of Macedonia (AJM)
- Independent Trade Union of Journalists and Media Workers (SSNM)

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