Enabling Media Freedom Through Implementation of the OSCE Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI:

Western Balkan Regional Implementation Guide

October 2026

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Executive Summary

This Regional Implementation Guide aims to translate the **Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI**[1] by the OSCE Representative on Freedom of the Media (RFoM) into concrete, country-specific entry points for the Western Balkans. It addresses two interconnected but distinct forms of capture affecting the regional media ecosystem: state/political capture of domestic media governance, and platform capture arising from Big Tech dependencies.

The Implementation Guide's recommendations are structured according to the four areas of the Policy Manual: **Media Visibility** (reducing Big Tech's control over content distribution and moderation, and protecting information pluralism); **Media Viability** (ensuring a level playing field for media in the platform economy and addressing AI's impact on news production, distribution and monetization); **Media Vigilance** (strengthening the online safety of journalists, including gender-sensitive protections); and a forward-looking **Long-Term Vision** which addresses the structural alternatives to platform dominance and dependency. Each area is grounded in documented cases from the region, with specific action points naming the responsible institution and a concrete task and timeline, where feasible.

Key entry points for implementation include the region-wide alignment of national frameworks with the EU's Digital Services Act, Digital Markets Act, European Media Freedom Act, and AI Act. Other entry points include efforts to address the unconsolidated digital and information ecosystems, political fragility and unresolved accountability gaps around a number of issues affecting media freedoms, such as unsolved cases of violation of physical and digital safety of journalists. The Implementation Guide is intended to be operationalized through a set of actionable measures by state authorities and other relevant actors. A full Action Points Matrix, with references to specific OSCE Policy Manual sections, responsible stakeholders, and an approximate implementation timeframe, is provided in Annex I.

[1] OSCE Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI, Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, 2025, available at: https://rfom.osce.org/representative-on-freedom-of-media/598525.

Key Action Points

Media Visibility

- Build a transparent, rights-based regulatory environment for content governance
- Protect journalistic content from unjustified removal (e.g. under EMFA safeguards)
- Require full transparency of content governance practices, including prioritization, shadow-banning and algorithmic down-ranking
- Counter information manipulation and FIMI (foreign information manipulation and interference) risks through co-operation with civil society and regional partners
- Implement DSA-aligned transparency and redress safeguards (statements of reasons, complaint mechanisms, dispute settlement bodies)
- Build regulatory capacity to audit AI-driven moderation systems (EU AI Act alignment)
- Establish independent, multi-stakeholder oversight mechanisms for platform practices
- Ensure fair, effective remedies for media actors affected by platform decisions
- Ensure generative AI tools provide visibility to original news sources (based on consent and fair remuneration), with legal implementation taking account of applicable copyright exceptions and rights reservations

Media Viability

- Conduct regular media pluralism and market assessments and integrate AI considerations into ongoing human rights impact assessments and legislation
- Resource independent media regulators and competition authorities to investigate media viability issues
- Align copyright law with the EU Copyright in the Digital Single Market Directive (including press publishers' rights)
- Add AI-provider obligations (training-data transparency, copyright compliance) to draft AI laws
- Extend media-viability safeguards (remuneration, competition, pluralism tools) to AI providers and deployers
- Explore compensation mechanisms for the AI context (levies, collective licensing)
- Support collective management organizations to negotiate AI licensing on publishers' behalf
- Equip authorities to oversee and enforce fair compensation and bargaining outcomes between media and AI providers, with regional co-operation

Media Vigilance

- Monitor online violence via existing safety mechanisms and prosecution units; require disaggregated platform data
- Develop gender-sensitive safety protocols within prosecution and investigation units
- Strengthen national, regional, and international co-ordination, including with platforms
- Establish a dedicated solidarity fund to support journalists and media workers targeted by online violence
- Secure sustainable funding for journalist safety mechanisms

- Support existing escalation channels and dedicated safety-complaint appeals mechanisms
- Align national frameworks with EMFA Article 4 (protection of journalistic sources)
- Enforce criminal law against online violence, including AI-facilitated doxxing
- Require human rights impact assessments for all legislative interventions

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Introduction

Published in 2025 and structured around the concepts of media viability, visibility, and vigilance, the **OSCE Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI** (the Policy Manual) provides a multi-perspective analysis of platform power and systemic dependencies affecting the media sector and their broader implications for the information environment. In response, it offers a set of policy tools aimed at safeguarding the availability and accessibility of public interest information, with the aim of promoting a more resilient and pluralistic online information ecosystem.

Developed in the period of increased geopolitical tensions and changing media landscape with the advancement of large language models (LLMs) and generative AI, the Policy Manual recognizes the **variety of legal systems and cultural contexts** relevant for identifying best approaches to safeguarding media freedom in the age of Big Tech and AI. It thus does not prescribe a single solution but provides a set of policy guidance and good practice examples to support international, regional, and local implementation activities. Consequently, it calls for regional contextualization and translation into concrete action points to set in motion and support activities rooted in local challenges, expertise, and opportunities.

This **Regional Implementation Guide translates** the **Policy Manual** into such **action points** by identifying local opportunities and providing entry points for its implementation in the Western Balkan region. It does so by recognizing that the regional context is characterized by two interconnected forms of capture – platform and state capture. The Policy Manual recognizes the former – platform capture – as a key media freedom challenge, emphasising how platform infrastructure, design, political and economic interest of Big Tech ultimately shape media landscape, pluralism and survival.[2] These dynamics also fundamentally shape distribution and revenue models in the Western Balkan region. The latter – state capture – relates directly to an overall unstable media ecosystem, which across the region shares similar characteristics. Media concentration and the related lack of media and political pluralism persist despite an increasing number of media outlets.[3]

This Implementation Guide is prepared amidst the **region's preparation for and operationalization of various digital ecosystem-related laws** through on-going media reform processes that shape the conditions for journalism and media freedom. Specifically, all countries in the region have undertaken some form of regulatory assessment, or even legislative drafting, in preparation for alignment with key digital platform regulations of the European Union (EU), such as the Digital Services Act (DSA), Digital Markets Act (DMA), European Media Freedom Act (EMFA), and the Artificial Intelligence Act (AI Act). For example, Montenegro adopted the Law on the Implementation of Regulation (EU) 2022/2065 on Digital Services,[4] transposing the DSA into national legislation, and in Albania, the Ministry of Infrastructure and Energy proposed the Draft

[2] *Ibid*.
[3] Centre for Media Pluralism and Media Freedom (CMPF), Media Pluralism Monitor 2024: Monitoring Media Pluralism in the Digital Era, Florence, 2024.
[4] Law on the Implementation of Regulation (EU) 2022/2065 on Digital Services, Montenegro, accessible at: https://amu.me/obavjestenje/zakoni.

Law 'On Digital Services in the Republic of Albania'[5] aiming to *partially* transpose the EU Digital Services Act (DSA) into domestic legislation.[6] In other countries of the region, similar processes are ongoing, such as the regulatory impact assessment in North Macedonia.

On the other hand, in Bosnia and Herzegovina, and similarly in Kosovo*,[7] the absence of comprehensive digital media-related policy and legislative initiatives represents a challenge, potentially reinforcing the issues identified in the Policy Manual. At the same time, Serbia is characterized by a specific political and regulatory context that requires a careful and balanced approach.[8]

Together, they present the **key entry points** for the implementation of the proposed action points stemming from the Policy Manual, as they create an opportunity to integrate media freedom safeguards and multi-stakeholder approaches at an early stage. Even in countries where policy and legislative processes are more advanced (such as Montenegro and Albania), this Implementation Guide's action points should be considered not as an afterthought, but as guiding principles throughout the development and implementation of legislative frameworks.

To meet this **complex regional regulatory context**, this Implementation Guide and its proposed action points are informed by a comprehensive review of relevant publications, analysis of media legislation, and the authors' sustained engagement in policy processes at both national and regional levels.

The Implementation Guide follows the structure of the Policy Manual to ensure consistency and clarity. It begins by outlining the overarching considerations and states' responsibilities in fostering an enabling environment for freedom of expression and media freedom. It then presents the recommended courses of action for both state and non-state actors to support the implementation of the Policy Manual across the Western Balkan region – through identification of policy entry points and responsible actors. Finally, it concludes with a forward-looking perspective, translating the Policy Manual's long-term vision of healthy online information spaces into the regional context and highlighting pathways for its future realization. The Annex to the

[5] Ministry of Infrastructure and Energy, Albania, consultation on the Draft law "On Digital Services in the Republic of Albania", available at: https://konsultimipublik.gov.al/Konsultime/Detaje/1022.

[6] In Albania, public consultations on the draft laws on artificial intelligence and digital services have concluded. The AI draft was published on 29 May 2026, with consultation closing on 26 June; the digital services draft was published on 23 July 2026, with consultation closing on 10 September. These processes provide an immediate opportunity to assess safeguards for media freedom before adoption and implementation. The digital services draft proposes AKEP as Digital Services Coordinator, alongside sectoral authorities, including the Audiovisual Media Authority, the data protection Commissioner and the Competition Authority. Implementation planning should clarify their respective responsibilities, complaint referral arrangements, resources and independence, with media and civil society participation.

**There is no consensus among OSCE participating States on the status of Kosovo and, as such, the Organization does not have a position on this issue. All references to Kosovo, whether to the territory, institutions or population, in this text should be understood in full compliance with United Nations Security Council Resolution 1244.*

[7] While Kosovo* lacks a comprehensive DSA/DMA-aligned platform-regulation framework, an AI-governance process has been emerging. In June 2026, the Information and Privacy Agency, together with the Office of the Prime Minister and the Ministry responsible for digitalisation, launched an assessment of the impact and readiness implications of the EU AI Act, including fundamental-rights and data-protection considerations.

[8] SEENPM, Regional Collection: *Risk Assessments of Digital Platform and Media Regulation in South-East Europe*, available at: https://seenpm.org/regional-collection-risk-assessments-of-digital-platform-and-media-regulation-in-see/; See also: Danche Danilovska-Bajdevska et al., *Towards Feasible Implementation of the Digital Services Act in the Western Balkans*, available at: dsa-wb-new.pdf.

Implementation Guide provides the list of action points, divided into the three program categories (Media Visibility, Media Vigilance, and Media Viability) and long-term vision, with proposed deadlines for their implementation, note on the responsible stakeholder, as well as the references to the specific Policy Manual sections.

Overarching Considerations for State Interventions

As underlined in the Policy Manual, "*any policy intervention must be rooted in the rule of law, adhere to international human rights standards, and be developed through inclusive, transparent, and multi-stakeholder due diligence processes - and be enforced by independent regulatory bodies and courts."*[9]

This guiding principle can be broken down into the following overarching considerations that should guide the operationalization of the action points outlined in the following chapters.

Multi-stakeholder governance as a guiding principle. This requires sustained and continuous co-operation between public authorities, independent regulators, the media sector, civil society, academia, and other relevant stakeholders.

Robust rule of law and human rights safeguards, proportional to intervention. Legislative and regulatory interventions should be accompanied by effective safeguards, including independent oversight, access to remedy, and proportionality guarantees. *"As a guiding principle, the scope and intrusiveness of regulatory measures should be matched by the strength of applicable safeguards."*[10] Before accession, national alignment should specify the domestic legal basis, supervision and enforcement powers. Replicating the European Commission's powers at the level of national institutions should be avoided,[11] and the focus should instead be placed on co-operation with European authorities which should be developed through the available legal channels.

Independence and effectiveness of media regulators. The independence in law and practice of media regulators remain essential for safeguarding media freedom and pluralism. This includes:

- **Institutional independence**, ensured through transparent, merit-based, and non-partisan appointment procedures;
- **Financial autonomy**, including adequate, stable, and predictable funding arrangements that limit undue influence from the executive;
- **Technical and operational capacity**, enabling regulators to address the complexities of platform governance and digital media markets.

[9] OSCE Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI, Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, 2025, available at: https://rfom.osce.org/representative-on-freedom-of-media/598525.

[10] The Policy Manual (p.133) also points out that any media interventions also carry risks, including potential political misuse and unintended impacts on freedom of expression, particularly in contexts where institutional safeguards may be weaker.

[11] This has also been highlighted at the 2024 TAIEX workshop, see https://webgate.ec.europa.eu/taiex/public/open/#/library/detail/85721.

Forward-looking and resilient information ecosystems. Participating States should ensure that legal and policy frameworks are forward-looking and adaptable to technological developments. While current approaches often seek to address existing imbalances between media and dominant platforms, future-oriented policies should also consider measures to promote a diverse, pluralistic, and sustainable information ecosystem. In this context, further exploration of public interest digital infrastructures may contribute to reducing systemic dependencies and strengthening media resilience. [12]

Action Points – *Fundamentals First*

In **Montenegro**, the existing working group on drafting the DSA, DMA and EMFA should continue to serve as an advisory body to the state authorities in the pre-accession period, before the implementing acts enter into force upon accession.

In **Serbia and North Macedonia,** the legislative alignment process should ensure ongoing and structured dialogue with media stakeholders, civil society organizations, and other relevant non-state actors throughout the drafting and implementation process. For example, the current Working Group drafting the AI Law in Serbia should be more inclusive and open for participation of media associations or experts. This would enable the upcoming legislation to address concerns related to impact of AI on freedom of expression and the media landscape.

In **all the Western Balkan (WB) countries**, governments and other authorized proposers of regulations should perform transparent regulatory impact assessments (RIA) to identify implications for fundamental rights, establish appropriate safeguards, and support effective implementation. In Kosovo*, the 2026 EU AI Act readiness/impact assessment could be used as the immediate entry point to integrate media freedom, freedom of expression, media pluralism and journalistic-source safeguards, and should be complemented by a DSA/DMA regulatory gap/impact assessment especially in light of the expectations for harmonization of the new IMC law with DSA/DMA.

In **all the WB countries**, the independence and institutional capacity of the competent authorities should be provided in the laws governing this area and regularly assessed (e.g. Independence stress test[13]) by independent researchers (academia and/or civil society), international partners, or regulators themselves. These assessments should be reinforced through peer exchange, capacity-building, and co-operation with EU Member States and relevant international partners.

In **all the WB countries, the impact of AI on the information landscape should be treated comprehensively,** as a media-market question with democratic relevance, not only as a production question. Policy interventions currently undertaken, such as in Serbia, North Macedonia, and Albania, should extend media-viability safeguards – including fair remuneration, competition, and pluralism tools – explicitly to AI providers and deployers, given

[12] OSCE *Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*, Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, 2025, p.22 available at: https://rfom.osce.org/representative-on-freedom-of-media/598525.

[13] See: *"Are EU Member States Meeting the Challenge Set By DSA?"* https://www.liberties.eu/en/stories/dsa-monitoring-paper/45286. In Kosovo*, the audiovisual media regulator Independent Media Commission (IMC) regained a full composition and functionality in May 2026 after a prolonged period without quorum. At the same time, the 2024 IMC Law was annulled by the Constitutional Court in 2025. Any renewed revision of the IMC Law is therefore a key opportunity to safeguard institutional and financial independence, transparent appointments, proportional powers/sanctions and adequate capacity for future digital/platform-related responsibilities, in line with European standards.

their growing role in the distribution and monetization of journalistic content.

The **OSCE Representative on Freedom of the Media and OSCE Field Operations** should continue to provide technical support and facilitate inclusive dialogue between state institutions and non-state stakeholders particularly where co-operation remains limited.

Building on these overarching and fundamental considerations, what follows is a structured overview of the identified cross-regional action points, which do not represent an exhaustive list of local and other regional pathways for the implementation of the Policy Manual. Structured around the central issues of the Policy Manual, they address media visibility, media viability and media vigilance by providing:

1. **OSCE RFoM Policy Manual Perspective –** provide key observations and lessons from the Policy Manual and their relations to the region;
2. **Action Points** – identify concrete action steps for a specific context/ongoing process, supported by illustrative examples, where appropriate;
3. **Action Points Matrix** – present lessons from the Policy Manual and a path forward for state and non-state actors, with proposed timeframes, responsible stakeholders and references to specific Policy Manual sections.

Media Visibility[14]

This section provides policy tools to safeguard the visibility of public interest journalism in platform-dominated information spaces, and to reduce Big Tech's control over content distribution and moderation while protecting information integrity, particularly during elections.

Ensure Algorithmic Curation Does Not Sideline Public Interest Journalism

OSCE RFoM Policy Manual Perspective

The Policy Manual treats visibility as more than a question of what platforms remove, but also as a question of what platforms choose to surface, rank, and amplify. Recommender systems and ranking algorithms actively shape which content reaches (which) audiences (and when). The Manual calls for considering the public interest of journalism in the algorithmic curation of content and for disclosure of the criteria behind this ranking so that systematic deprioritization of public interest content can be identified and challenged. It extends this concern to generative AI: as AI-mediated search and summary features increasingly answer users' queries directly rather than linking out to original sources, the Manual flags the risk that this reshapes discovery in ways that reduce the visibility (and referral traffic and thus viability) of the journalism the information itself depends on, and calls for visibility safeguards adapted specifically to this shift.

Illustrative cases

Many media outlets in the Western Balkans depend on platforms for visibility and revenue. According to the Reuters Institute, this shift towards AI-driven systems that reward speed, emotion, and engagement over context and accuracy additionally marginalizes local journalism and leads to a further weakening of public interest reporting, especially in smaller and politically sensitive markets across the region.[15] Focus group research across the Western Balkans found that media professionals in the region report AI-powered search summary features are already reducing referral traffic and revenue to news sites. [16]

Action Points

- **Ensure the ongoing regulatory reforms address the impact of ranking/recommender systems on public interest journalism**: Several Western Balkan countries have adopted national laws aligning with the EU's Digital Services Act (such as Montenegro), or are in the post-consultation review stage (such as Albania,

[14] See also the section "To regulate or not: Role of Content Creators in bolstering Media Freedom" below (Vision for the Future) for a forward-looking discussion of visibility-related obligations for influencers and content creators outside traditional legacy media.

[15] See: AI and journalism by 2026: what the Reuters Institute forecasts mean for the Balkans – NarativAI, available at: https://narativai.org/ai-and-journalism-by-2026-what-the-reuters-institute-forecasts-mean-for-the-balkans.

[16] S. Hodzic, S. B. Hrvatin, "Media and Democracies at Risk: Aware but Largely Disengaged Citizens", available at: https://futureofmedia.seenpm.org/wp-content/uploads/2026/03/Ourmedia_BIH-ENG_2026.pdf, page 28.

where the Draft Law includes a specific article on this issue[17]) or regulatory preparatory stage (such as Serbia and Kosovo*). These processes should be used as a window of opportunity for civil society and media associations to push for the laws to include disclosure obligations for ranking/recommender criteria (as mandatory in the DSA) and a prominence safeguard for public interest journalism, rather than limiting DSA transposition to moderation and redress provisions alone. Any additional prominence measures should use transparent criteria and safeguard editorial independence against political interference.

- **Regional co-operation on AI-mediated discovery:** Given the shared, small-market exposure to the same handful of dominant search and AI platforms, WB media regulators and media associations should develop a joint regional position, co-ordinated through the OSCE where feasible, on the impact of AI search summaries on referral traffic, as a basis for future engagement with AI providers and for informing generative-AI provisions as they are transposed under national AI laws (e.g., Serbia's ongoing AI law drafting process).

Reduce Big Tech Visibility Control Over Media Distribution

OSCE RFoM Policy Manual Perspective

The Policy Manual recognizes visibility as a central component of media freedom and highlights the need to address structural risks arising from increasing platform power and media dependency on digital platforms. This challenge is particularly pronounced in the Western Balkans, where small media markets, various forms of media capture, and heavy reliance on large technology platforms have created vulnerabilities for independent and public interest media. Media actors across the region report unexplained changes in audience reach and engagement, opaque algorithmic changes, limited transparency, ineffective complaint mechanisms, and significant resource demands linked to continuously adapting to evolving platform rules and formats. Failures in moderation systems, co-ordinated reporting campaigns, and information manipulation practices have further affected the visibility of independent media.

To address these systemic risks, the Policy Manual calls for stronger transparency, accountability, and structural human rights safeguards in platform and content governance. Digital platforms should conduct human rights impact assessments for their content governance rules, provide greater transparency regarding recommender systems, enable independent auditing of their impact on media pluralism, and establish effective accountability mechanisms. Policy approaches to increase media visibility may include trust and provenance mechanisms, interoperability measures, independent recommender systems, and safeguards ensuring appropriate prominence of public interest content.

The Policy Manual further emphasizes the need to strengthen the visibility and sustainability of public interest journalism through fairer digital advertising practices and measures preventing algorithmic incentives from undermining accuracy, accountability, and diversity of information. Responses to co-ordinated manipulation of visibility and information flows, including disinformation and foreign information manipulation and interference (FIMI), should be developed through co-operation between public authorities, media organizations, civil

[17] See: https://konsultimipublik.gov.al/Konsultime/Detaje/1022.

society, platforms, and regional partners.

Illustrative cases

In the Western Balkans, where platform regulation is largely lacking, journalistic content is often removed, restricted, or made less visible without clear justification, while internal platform appeal systems often fail to provide timely, consistent, or independent remedies. In practice, this creates an environment where moderation decisions affecting media content are difficult to contest and insufficiently explained, while platforms' content curation generally seems to deprioritize independent journalistic content and public interest information.

Concrete cases from the region further illustrate these dynamics. In 2022, the Albanian Media Council received over 50 reports involving the removal or restriction of journalistic content on platforms operated by Meta Platforms. In 2024, the independent media outlet Citizens Channel reported the removal of more than 2,000 posts following co-ordinated mass-reporting activity on Facebook and Instagram, highlighting the vulnerability of automated moderation systems to co-ordinated abuse and failure to recognize legitimate, journalistic content of public interest.

In 2026, several Serbian outlets, including Danas, N1, Nova.rs, and KTV Zrenjanin, reported co-ordinated intimidation and bot-driven campaigns targeting their online presence, including accounts such as Radar. Subsequent enforcement actions by Meta Platforms, including account removals and suspensions for alleged community standards violations, further underscore concerns about the opacity and proportionality of platform enforcement. In September 2026, dozens of activist accounts and two media outlets reporting on the Flamingo Revolution protests in Albania were reportedly targeted and blocked on Meta platforms following repeated copyright complaints. Some of the affected content was subsequently restored after Meta acknowledged that the removals had been made in error.[18] In response to this case in Albania, more than 30 MEPs asked the European Commission to examine whether Meta's actions complied with DSA obligations concerning fundamental rights, transparency, complaints and systemic risks.

Action Points

- **Address systemic risks to media freedom in digital platform governance processes.** All the WB countries should use the ongoing EU alignment of digital platform-related legislation to assess and address the systemic impact of platforms on media freedom and information flows in the region. These assessments and policy processes, such as the process of drafting the new media strategy in North Macedonia,[19] should consider challenges related to media visibility, distribution, and access to audiences, while identifying measures to strengthen safeguards for independent media.
- **Ensure visibility of media content**: In-country alignment process with digital regulation, and in particular the European Media Freedom Act (EMFA) should ensure that journalistic content is not subject to unjustified restriction or downranking (considering both content curation and moderation). Media actors should have access

[18] See https://www.reprouncensored.org/research-overview/meta-albania-eu.

[19] See https://plusinfo.mk/makedoni-a-ima-dobri-kvalite-tni-mediumi-i-toa-trreba-da-se-unapredi-andonovski-na-avi-nacionalna-strategi-a-za-razvo-na-mediumskiot-sektor.

to effective complaint and redress mechanisms where visibility or reach is affected.

- Consider **visibility rules also for generative AI tools**, to ensure visibility is given to original news sources (which should be used only based on consent and fair remuneration). This is a policy objective. Legal implementation should distinguish licensing requirements, applicable copyright exceptions and rights reservations, and should support attribution and links to original reporting.
- **Strengthen institutions**: States should invest in independent regulatory and oversight bodies with expertise in algorithms and AI, ensuring the capacity to assess their impact on issues related to media diversity, freedom of expression safeguards, and democratic processes broadly, including institutional independence. This reflects the Policy Manual's call for "independent oversight" grounded in technical and human rights expertise.
- **Promote evidence-based and rights-respecting policy responses.** Non-state actors, in co-operation with state institutions and OSCE Field Operations where appropriate, should support the collection of evidence and data on media distribution challenges, co-ordinated manipulation of visibility, and information integrity risks, including disinformation and foreign information manipulation and interference (FIMI).
- **Strengthen multi-stakeholder oversight mechanisms.** Existing co-operation mechanisms established through the legislative digital platform alignment process should be used to facilitate independent monitoring, review, and dialogue on platform practices, bringing together regulators, media organizations, civil society, and academia. Such multi-stakeholder approaches reflect the Manual's recommendation for inclusive and participatory governance models while supporting transparent and accountable platform governance. For example, the existing Working Group in Montenegro can serve as an advisory and oversight body in the pre-accession process.

Establish Rights-Based Governance Frameworks

OSCE RFoM Policy Manual Perspective

The Policy Manual grounds both content moderation and curation in a rights-based governance framework built on transparency, accountability, and due process. Moderation must not remain opaque – including hidden enforcement like shadow-banning or algorithmic down-ranking – and users should understand not just the rules that apply to them but the reasoning behind specific outcomes. The reasoning must be based on human rights and not merely economic incentives. This requires *ex ante* human rights impact assessments and respective considerations in content policies as well as clear explanations for content restrictions and effective, timely, accessible appeal mechanisms; without these, moderation risks become arbitrary.

The Policy Manual also stresses independent oversight beyond internal company structures, with media actors and civil society monitoring enforcement and systemic risks through access to platform data and independent audits – particularly to catch unequal or disproportionate enforcement. It frames visibility as a systemic governance issue rather than isolated decisions, calling for attention to moderation's cumulative effects on media pluralism, democratic discourse, and the visibility of public interest journalism, especially where political sensitivity or institutional weakness amplify risks.

Action Points

- **Ensure visibility of media content in all the WB countries is addressed by the new regulatory solutions**. In-country alignment process with digital regulation, and in particular with EMFA, already ongoing in countries such as Montenegro, or initiated in countries like Serbia, should ensure that journalistic content is not subject to unjustified restriction or downranking. This includes that procedural safeguards for qualifying media service providers under EMFA Article 18 should be reflected in the reformed legislation, subject to its conditions and exceptions, and that the media actors should have access to effective complaint and redress mechanisms where visibility or reach is affected.
- **Establish a transparent, accountable, and rights-based regulatory environment:** Building on the OSCE RFoM Policy Manual, Western Balkan States should prioritize a regulatory and institutional environment that ensures transparency, accountability, and effective remedies in content moderation. This requires aligning national frameworks with fundamental rights standards and ensuring that platform governance is subject to clear, enforceable rules. States should gradually strengthen compliance with the Digital Services Act, particularly its provisions on transparency, impact assessments, and redress. States should ensure that users systematically receive statements of reasons for moderation decisions, have access to effective internal complaint mechanisms, and can rely on independent out-of-court dispute settlement bodies that are operational, accessible, and trusted.
- **Protect journalistic content in line with EMFA safeguards:** Safeguards introduced under the European Media Freedom Act should be integrated into national systems to ensure that journalistic content is protected against unjustified removal or restriction. In line with the Manual's emphasis on due process, qualifying media service providers should receive reasons and an opportunity to respond before very large online platforms restrict their content on grounds of incompatibility with platform terms and conditions, subject to the exceptions in EMFA Article 18(4). Content curation should consider the public interest value of independent journalism.
- **Require comprehensive transparency of moderation practices:** States should require greater transparency from platforms regarding "all forms of moderation", including content removal, restriction, and visibility reduction measures such as shadow-banning. This should include meaningful disclosure of how automated systems "contribute to enforcement decisions" and how these systems shape content distribution.
- **Strengthen oversight of AI-driven moderation systems:** Institutional capacity should be strengthened to assess the risks posed by AI-driven moderation systems, under the applicable DSA-aligned framework and relevant Artificial Intelligence Act requirements. Authorities should be equipped to evaluate impacts on "fundamental rights, including freedom of expression and media pluralism", reflecting the Manual's concern with systemic risks to media freedom.
- **Establish independent, multi-stakeholder oversight mechanisms:** Consistent with the Policy Manual's emphasis on "independent oversight", states should support the creation of multi-stakeholder mechanisms at national or regional level. These should enable independent monitoring, review, and mediation of platform practices, involving regulators, media, civil society, and academia.
- **Ensure access to fair and effective remedies for media actors:** Such oversight

frameworks should guarantee that media actors have access to fair and effective remedies, including both platform-based complaint systems and independent review or mediation mechanisms. In the WB, accessible human review should address local language and context, co-ordinated reporting and abusive copyright complaints. Media associations and independent support organizations should help affected newsrooms preserve evidence, submit appeals and track response times and outcomes, without disclosing confidential sources.

Protect Diversity and Pluralism of the Information Ecosystem – especially during the Election Process

OSCE RFoM Policy Manual Perspective

The Policy Manual approaches media visibility as a question of how information is distributed, prioritized, and moderated in platform environments, highlighting that platforms exercise gatekeeping power over what content gets attention.[20]

This gatekeeping directly affects information integrity, and becomes even more relevant in electoral contexts, as platform systems often amplify engagement-driven content while limiting the visibility of public interest journalism.

Regional findings highlight that electoral periods in the Western Balkans are particularly vulnerable to disinformation, political pressure, and manipulation of information flows ,[21] creating conditions that can be exploited by Foreign Information Manipulation and Interference (FIMI), particularly through co-ordinated amplification and visibility manipulation. The Policy Manual calls for the need to ensure the availability and accessibility of public interest journalism to enhance citizens' access to reliable information as a key condition for informed democratic participation.

Illustrative cases

Media and information ecosystems in the Western Balkans are often characterized by polarization. For example, during the 2025 anti-government protests in Serbia, media aligned with the government reportedly did not report on activist detentions or alleged excessive use of force by the police. Moreover, citizens increasingly turned to protest organizers/witnesses directly rather than media outlets for information. This case illustrates a media ecosystem too polarized to serve as a shared, trusted source during politically contested moments, which is a risk that extends directly to election periods.

With parliamentary elections due by 30 June 2027, EU officials have publicly named

[20] *OSCE Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*, Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, 2025, p.15-16, available at: https://rfom.osce.org/representative-on-freedom-of-media/598525.

[21] SafeJournalists Network, Handbook for Journalists in Election, https://safejournalists.net/wp-content/uploads/2025/04/handbook_transition_FINAL.pdf.

Montenegro as a likely target for Russian-linked disinformation given its EU accession ambitions.[22] Civil society organizations have responded with a Meta-funded "Global Election Integrity" program monitoring social media for abuse of state resources and mis- and disinformation – but as a donor-funded, time-limited initiative, not a standing state mechanism, it does not constitute a formal platform co-operation channel.[23]

Action Points

- **Election-period platform co-ordination in Montenegro as a pilot for the whole region.** Montenegro's Agency for Electronic Media, AEM, and State Election Commission, SEC, (the SEC does not operate anymore but shall be transformed into a professional Central Election Commission, CEC[24]) should formally adopt, ahead of the June 2027 general elections, an *ad hoc* platform co-ordination mechanism – requiring platforms operating in Montenegro to submit pre-election risk assessments and designate a rapid-response contact point no later than six months before polling day.

- In Kosovo*, but also relevant for other countries, **functional and timely media monitoring and oversight during elections should be a co-ordinated effort**, translated into a protocol, including regulators, Central Election Commission, cybercrime units, Press Council, CSOs – resulting in an effective information sharing and rapid response mechanism – ensuring greater media and advertising transparency, media pluralism and public debate.

[22] See: https://www.eeas.europa.eu/eeas/keynote-speech-hrvp-kaja-kallas-2026-conference-countering-foreign-information-manipulation-and_en.
[23] See: https://www.ifes.org/montenegro.
[24] See: https://en.vijesti.me/news-b/politika/827117/The-sixth-competition-for-the-president-and-members-of-the-CIC-has-been-announced.

Media Viability

This chapter refers to policy tools designed to support the financial viability of journalism and to promote fair compensation and strengthen the economic sustainability of public interest journalism in the digital age.

Enable a Level Playing Field in the Media Ecosystem

OSCE RFoM Policy Manual Perspectives

The Policy Manual recognizes that in today's digital landscape, the viability of media is directly tied to the visibility of its content. Digital platforms and search engines derive substantial value from media content, while at the same time often withholding key data for the media, such as on user engagement or advertising performance. This limits the media's ability to develop competitive revenue strategies, and further illustrates the platforms' gatekeeping power.

State intervention can play an important role in creating an enabling market environment for media pluralism and sustainability. The Policy Manual highlights the need for diversified and sustainable funding models for public interest journalism, including transparent media support schemes, digital services taxation, and other mechanisms that can strengthen the viability of independent media while ensuring strict safeguards for editorial independence, transparency, accountability, and fair access, particularly for smaller, local, and nonprofit media.

These considerations are particularly relevant in the Western Balkans, where media sustainability is increasingly challenged by limited revenue opportunities, high dependence on Big Tech platforms, and the absence of effective responses to the growing dominance of these major technology companies in digital advertising markets. Despite the increasing role of platforms such as Google and Meta as key actors in media distribution and advertising – and thus also media revenue – competition authorities and regulators across the Western Balkans have yet to develop adequate mechanisms to address potential market distortions and their implications for media pluralism.

Finally, in the Western Balkans, both domestic and regional forms of media concentration continue to shape the information environment, including concerns related to cross-border ownership and infrastructure expansion. Cases include the growing presence of Telekom Srbija across neighbouring markets, as well as highly concentrated media markets such as in Albania. In this context, support measures – such as bargaining frameworks – must be designed to strengthen pluralism rather than reinforce existing concentrations of power. At the same time, recent reductions in external financial support for media underline the need for sustainable, transparent, and independent funding models.

Action Points

- **Support sustainable and diverse media ecosystems.** Media reforms and future media and information ecosystem strategies should incorporate measures to strengthen media sustainability. As currently discussed in North Macedonia and implemented in several countries across the region, the media strategies must recognize and address the interlinked nature of visibility and the economic dimension of media freedom, including fair access to digital advertising.
- **Ensure transparent and legitimate media financing based on public interest criteria**, including for digital media. For example, in BiH, revise the existing criteria for media financing at all levels of government and introduce a state-level media fund for public interest journalism.
- **Equip Media Regulators and/or Competition Authorities with resources** (mandate, expertise, financial capacities) to engage in the investigation and follow up procedures to tackle media viability issues. They should **regularly conduct media pluralism and market assessments.** These assessments should inform domestic supervision processes and, where appropriate, contribute to on-going investigation of European authorities.
- Future **amendments of the copyright law** should consider the right to authorize the online reproduction, and communication to the public of the media content, as provided in the EU DSM Directive.[25] Specifically, future amendments should align copyright legislation with Article 15 (press publishers' related right) and Article 4 (text and data mining exception with a machine-readable rights reservation) of the Directive (EU) 2019/790. Alignment should also preserve the distinct scientific-research text-and-data-mining exception in Article 3, and the scope and exclusions of the press publishers' right.
- Develop policies that **incentivize advertisers to invest in public interest journalism,** that can be supported through offering tax incentives or special write-off for public interest advertising.
- **Integrate AI-specific considerations into ongoing human rights impact assessments and legislative processes (for example, in North Macedonia and Albania) at an early stage, so that press publishers' rights, text and data mining safeguards, and compensation mechanisms** are built into media and digital legislation rather than added as an afterthought.

Ensure Fair Compensation and Remuneration for the Use of Journalistic Content by AI

OSCE RFoM Policy Manual Perspective

The Policy Manual recognizes that the transition to an AI-driven information ecosystem has significant implications for media viability, as generative and general-purpose AI systems reshape the relationship between content creation, distribution, and revenue. AI providers and deployers should be treated as relevant market actors whose use of journalistic content

[25] Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market and amending Directives 96/9/EC and 2001/29/EC, available at: https://eur-lex.europa.eu/eli/dir/2019/790/oj/eng.

requires appropriate safeguards, including opt-ins, protection of rights, transparency obligations, and fair remuneration mechanisms. These are policy objectives; the scope of existing statutory rights, exceptions and payment obligations must be assessed separately.

This is particularly important in smaller and fragile media markets, such as those in the Western Balkans, where AI-driven changes in search and content distribution risk further reducing the visibility and sustainability of local and public interest journalism. Across the region, publishers are already reporting declining referral traffic as search engines introduce AI-generated summaries that provide information directly within search interfaces, reducing incentives for users to access original sources. For smaller language markets, the impact is amplified, as locally produced journalistic content can contribute to AI systems serving audiences beyond national borders, while associated advertising and subscription revenues continue to decline.

The Policy Manual highlights a range of policy tools that can support a fairer digital media ecosystem, including copyright and neighbouring rights frameworks, text and data mining safeguards, collective licensing, copyright levies, competition law measures, and bargaining mechanisms. Experiences from different jurisdictions, including bargaining frameworks and regulatory interventions addressing platform responsibilities, demonstrate possible approaches to improving the balance between Big Tech and news providers. These approaches are increasingly relevant in the Western Balkans, where emerging AI-related challenges remain largely unaddressed in existing media reforms.

For example, recent media law reforms in North Macedonia have introduced requirements related to online media registration and staffing but do not yet address the use of journalistic content for AI models training, press publishers' rights vis-à-vis AI providers, or possible compensation frameworks. Similarly, in Serbia, existing challenges related to advertising market concentration and platform dependency are being further compounded by AI-driven distribution changes, while competition and media regulators have yet to fully assess their impact on the news market. In applying these tools, states should consider the specific characteristics of smaller, shared-language markets and ensure that any intervention strengthens collective action, protects smaller and nonprofit media outlets, prevents unequal bargaining power, and channels potential compensation through transparent and independent mechanisms.

Illustrative cases

Research into Serbian newsrooms found journalists "experimenting more and more with AI" despite receiving no formal training and few outlets having internal guidelines; tools were widely described as "useful, but unreliable."[26] Research on the use of AI in media in Montenegro reveal similar findings,[27] while the use of AI in mainstream media continuously increases.[28]

[26] See: B. Cvejic, "*Upotreba vestacke inteligencije u kreiranju medijskog sadrzaja u Srbiji*" available at: https://nuns.rs/upotreba-vestacke-inteligencije-u-kreiranju-medijskog-sadrzaja-u-srbiji; See also: *"Hallucinations and Unguided Experimentation: AI in Serbian Newsrooms",* Balkan Insight available at: https://balkaninsight.com/2025/05/12/hallucinations-and-unguided-experimentation-ai-in-serbian-newsrooms.

[27] See: D. Djuraskovic, *"AI u redakciji: Prve promjene u novinarskoj praksi u Crnoj Gori",* available at: https://sindikatmedija.me/publikacije/ai-u-redakciji-prve-promjene-u-novinarskoj-praksi-u-crnoj-gori.

[28] For example, portal inflacija.me is promoted as the first regional portal where content is completely created by AI. See also: https://narativai.org/ai-and-journalism-by-2026-what-the-reuters-institute-forecasts-mean-for-the-balkans.

Moreover, no copyright-related financial agreements exist between platforms/AI providers and WB media (or, at least, are publicly known), and no law yet regulates AI's use of journalistic content – even as some countries (such as Serbia, Kosovo*, and Albania) move to adopt their first AI Law.

Action Points

- **Explore fair remuneration mechanisms for journalistic content.** States and relevant stakeholders in all WB countries (Ministry of Economy, Media, Digitalization, Regulatory Authorities) should hold policy discussions and conduct studies to assess approaches to address the value imbalance created by Big Tech platforms' distribution and monetization of journalistic content, and AI companies' use of journalistic content for training models and other purposes. OSCE Field Operations can support these processes by facilitating dialogue among media organizations, regulators, AI and technology companies, think tanks, civil society, and other relevant stakeholders.
- **The relevance and feasibility of mechanisms such as bargaining codes or collective compensation models should be further examined in the South-East Europe context**, taking into account the specific characteristics of smaller and fragmented media markets. Existing media reform processes and strategies should incorporate market assessments addressing media sustainability, ownership concentration, and funding challenges, using the policy options outlined in the Manual as a basis for developing context-specific approaches. These discussions can also be integrated into the ongoing alignment processes related to the European Media Freedom Act (EMFA) and broader EU digital policy frameworks.
- **Use the ongoing AI laws drafting processes (such as those in Serbia, Albania and Kosovo*) to introduce obligations for providers of general-purpose AI models, mirroring the EU AI Act.** This should include an obligation to publish sufficiently detailed summaries of the content used for training AI models and to put in place a policy to comply with copyright law, including applicable rights reservations.
- **Explore compensation mechanisms adapted to AI, including copyright levies, data-use levies on AI providers, and collective licensing schemes for training data.** Leverage regional co-operation, both at the level of media associations, and media regulators, when negotiating with AI deployers, given the small market size and shared-language dynamics across the Western Balkans**.**
- **Support the existing, or establishment and operation of new collective management organizations able to negotiate AI licensing and enforce related rights on behalf of publishers,** with particular attention to the inclusion of small, local, and nonprofit media to prevent asymmetric bargaining outcomes. Similarly to Action Point 4, regional approaches should be considered in this regard, as well.
- **Equip relevant authorities, specifically media regulators and competition authorities, with the technical and financial capacity and mandate to oversee and enforce fair compensation and bargaining outcomes between media organizations and AI providers, including monitoring compliance with negotiated agreements and preventing asymmetric bargaining power for smaller and public interest media.** Co-operation of relevant authorities from the Western Balkan region should be prioritized, through joint capacity building, knowledge exchange, as well as joint investigations, having in mind the size and specifics of the market.
- **Regional collective licensing consortium:** Media associations in the WB should jointly establish a shared collective management organization or licensing consortium

to negotiate AI training-data compensation with major AI deployers on behalf of member outlets, with a reserved seat or quota for small, local, and nonprofit media to prevent asymmetric bargaining.

Explore Tax Incentives and Demonetization of Disinformation as Media Sustainability Tools

OSCE RFoM Policy Manual Perspective

Beyond bargaining and copyright mechanisms, the Policy Manual points to fiscal instruments as a complementary lever for media viability: digital services taxation on Big Tech platforms (with revenue channelled toward media pluralism/support funds), tax incentives such as reduced VAT on journalism, tax credits for journalism employment, and deductibility of donations/subscriptions to nonprofit and public-interest media. It also references "demonetization" as a policy tool in the disinformation context – denying advertising revenue to actors engaged in co-ordinated manipulation, an approach the EU has already formalized through the "Scrutiny of Ad Placements" chapter of its Code of Practice on Disinformation (now integrated into the DSA-linked Code of Conduct), under which platforms and ad-tech intermediaries commit to defunding known disinformation sources.

In order to limit the capture of journalism's economic value chain by Big Tech, the Policy Manual further emphasizes the importance of stronger protection of copyright and neighbouring rights, mechanisms that enable fair negotiations between platforms and media organizations, and fair distribution of value within the digital media ecosystem through competition enforcement. Experiences from different jurisdictions, including bargaining frameworks and regulatory interventions addressing platform responsibilities, demonstrate possible approaches to improving the balance between Big Tech and news providers.

Feasibility varies sharply across these tools for the Western Balkans. VAT alignment is the most immediate: most WB States already apply reduced VAT to print media, and extending the same rate to digital news could be a low-cost step already implicit in EU accession VAT harmonization. Tax credits for journalism employment and deductibility of donations/subscriptions are similarly low-cost and low-controversy, and would directly support the small, nonprofit, and local outlets the Implementation Guide repeatedly flags as being the most exposed. A digital levy or services tax is politically and technically harder since it requires co-ordination to avoid double-taxation disputes and the kind of retaliatory trade friction that EU Member States' unilateral digital service taxes have triggered. In addition, no WB country or media/ad-industry association currently participates in an EU Code of Practice-style commitment.

Illustrative cases

The fiscal tools remain largely unaddressed in current WB media and tax legislation. For the sake of comparison, the EU's Code of Practice on Disinformation includes the "Scrutiny of Ad Placements" commitments, while the EU Member States extended the reduced VAT rates to digital publications following the 2018 EU VAT Directive amendment.

Action Points

- **VAT alignment as a near-term win***:* WB finance ministries, as part of the ongoing EU accession harmonization, should confirm that reduced VAT rates already applied to print journalism are extended to digital news subscriptions and access, closing a gap that currently disadvantages digital-native and smaller outlets.
- **Regional feasibility mapping for a digital services tax and ad-placement demonetization***:* Media associations and regulators across the WB, co-ordinated through OSCE Field Operations, should explore, e.g. through a joint feasibility study (i) a co-ordinated approach to digital services taxation and (ii) a regional demonetization commitment modelled on the EU Code of Practice on Disinformation, before any individual country legislates unilaterally.

Media Vigilance

This chapter examines policy interventions to strengthen media vigilance and to better protect and promote the safety of journalists in the online environment.

Strengthen Safety of Journalists and Editorial Independence through the Work of National Safety Mechanisms and Online Protection of Journalists

OSCE RFoM Policy Manual Perspectives

The Policy Manual recognizes that if journalists cannot report safely, if their work is rendered invisible or economically unsustainable, neither the integrity of the public discourse nor media freedom can be protected. It thus emphasizes that the safety of journalists requires a holistic approach addressing the interconnected nature of physical, digital, legal, economic, and gender-based threats. Such an approach recognizes that attacks on journalists and media actors not only affect individuals but also undermine media freedom and democratic resilience more broadly.

Safety of journalists risks remain highly relevant in the Western Balkans, where journalists continue to face serious threats, including digital surveillance, strategic lawsuits, and legal harassment. In Serbia, for example, dozens of journalists were reportedly subjected to spyware attacks in 2025, with investigations by non-state actors identifying serious legal and human rights concerns, while accountability measures remain pending. In Albania, the growing number of lawsuits against journalists – including civil and criminal proceedings – highlights persistent challenges related to SLAPPs, particularly in the absence of a dedicated legal framework and with defamation not fully decriminalized.

The Policy Manual underlines that ensuring journalists' safety is a shared responsibility requiring effective prevention, investigation, accountability, and an enabling legal environment, led by state authorities and supported by meaningful engagement with media organizations and civil society. Existing national safety mechanisms in the region provide important platforms for co-ordination, but they require further strengthening, including through improved digital safety responses, gender-sensitive approaches, and stronger co-operation with relevant technology platforms. Cross-border co-operation and multi-stakeholder engagement remain essential to addressing emerging threats, preventing impunity, and ensuring that journalists can operate safely and independently.

Illustrative cases

In 2025, SafeJournalists and the BH Journalists Association recorded 35 attacks and threats against journalists in Bosnia and Herzegovina, including 8 targeting women journalists – half involving explicit gender-based violence. One case of serious online threats against women journalists and other women in public life led to arrest and detention, a rare precedent for treating online violence as a genuine security threat. Yet despite BiH's network of 33 police/prosecutorial contact points for journalist safety, there is still no standing channel for

getting disaggregated data from the platforms where most of this abuse actually happens.[29]

Amnesty International's "A Digital Prison" investigation (December 2024) found Serbian police and the Security Information Agency (BIA) using a domestically built Android spyware tool called NoviSpy – deployed during police detentions and interviews – alongside NSO Group's Pegasus spyware, against journalists and civil society activists. Two journalists of the Balkan Investigative Reporting Network (BIRN) were confirmed targeted with Pegasus in February 2025, months after Amnesty's disclosure and criminal charges had already been filed. Despite spyware use against journalists being a criminal offence under Serbia's own Criminal Code, authorities have not halted the practice or opened an independent investigation into its origins.[30]

Action Points

- **Monitor online violence against journalists through existing safety mechanisms and prosecution units**, like in Bosnia and Herzegovina or Kosovo*. National safety mechanisms or where possible judiciary and law enforcement should require platforms to provide disaggregated data on safety risks and responses, including by gender, country, type of violation and perpetrators if against their terms of service, and case outcomes if reported. Requests should rest on a clear legal basis. Public reporting should use aggregated, privacy-protecting data; access to identifiable information should be necessary, proportionate and subject to appropriate safeguards.
- **Develop and implement holistic, gender-sensitive safety protocols within the work of the prosecution and units in charge of crime investigation, with a particular focus on digital threats.** Involvement of media actors, journalists' unions and media representatives should be mandatory, and the **meaningful participation of women journalists and those from underrepresented groups** should be ensured. For example, in Kosovo* and several other countries, a structured protocol should be developed for rapid referral and follow-up of online threats, doxxing and gender-based abuse against journalists, with disaggregated data and periodic case-review meetings involving AJK, Kosovo* Police, prosecution and relevant platform contacts and Kosovo* Journalists Association (AGK).
- **Strengthen co-ordination across national, regional, and international initiatives**, including structured engagement with platforms to improve accountability and responsiveness.
- **Ensure sustainable financial support for journalist safety mechanisms**, including trusted escalation channels and partner organizations, to guarantee their long-term effectiveness.
- **Establish a dedicated solidarity fund to support journalists and media workers targeted by online violence at the regional level.** OSCE RFoM and OSCE Field Operations in collaboration with various international and national actors could provide an impetus for such a solidarity fund.
- **Provide financial and institutional support to independent media actors and organizations acting as first responders and bystanders**, while fully safeguarding their independence through existing project support mechanisms operated by states.

[29] See: https://safejournalists.net/bh-journalists-a-total-of-35-attacks-on-journalists-and-media-outlets-registered-in-bih-in-2025-political-pressures-intensifying.

[30] See: Amnesty International Report *"Serbia: A Digital prison: Surveillance and the suppression of civil society in Serbia"*, available at: https://www.amnesty.org/en/documents/eur70/8814/2024/en.

Design and Implement Laws for (Gender-Sensitive) Online Safety

OSCE RFoM Policy Manual Perspective

The Policy Manual recognizes that ensuring the safety of journalists online requires comprehensive, multi-layered responses combining regulatory safeguards, effective legal remedies, institutional capacity, and meaningful multi-stakeholder co-operation. The ongoing alignment of WB countries with EU digital regulations provides an important opportunity to strengthen existing safety mechanisms and address emerging risks affecting journalists. The new regulatory frameworks introduce relevant tools, including systemic risk assessments, content moderation obligations, due diligence requirements, trusted flaggers, and access to effective redress mechanisms. However, their impact will depend on effective implementation and enforcement, including the extent to which platforms adapt their practices to better protect journalists and media freedom.

These opportunities are particularly relevant in the Western Balkans, where legal reforms are increasingly addressing technology-facilitated violence and gender-based threats. Montenegro, and more recently Bosnia and Herzegovina, have introduced legislative changes addressing forms of gender-based violence facilitated through technology, including non-consensual image sharing and other forms of online abuse. At the same time, across the region, alignment with the Council of Europe Istanbul Convention has contributed to important reforms, although gaps in criminal procedures, institutional capacity, and awareness continue to limit effective access to justice, particularly for women journalists facing online violence.

The Policy Manual further highlights the need to address digital surveillance, spyware, and risks related to large-scale data processing, which can threaten journalistic sources and media operations. Strengthening co-operation between law enforcement, platforms, journalists' associations, and civil society networks – including through escalation channels, peer support mechanisms, and trusted reporting systems – remains essential to complement legal remedies and ensure effective protection in practice.

Illustrative cases

Women journalists in the Western Balkans continue to face a range of threats and harassment, from smear campaigns and sexist insults, to doxxing and direct threats. For example, between 2021 and 2025 the Association of Journalists of Kosovo* documented 37 attacks exclusively against women journalists.[31] In Serbia, these numbers are even more worrying – in June 2026 alone, the Independent Association of Journalists of Serbia reported 21 cases of different types of threats to journalists in the country.[32] The most recent cases (July 2026) include threats to (among other individuals and newsrooms) two female journalists of BIRN.[33]

[31] See: G. Mulliqi, *"The Safety of Women Journalists and Media Workers – Kosovo Brief 2025",* available at:https://safejournalists.net/wp-content/uploads/2026/05/The-safety-of-women-journalists-and-media-workers-%E2%80%93-Kosovo-Brief-2025-.pdf, page 3.

[32] See: https://nuns.rs/nuns-jun-ozbiljne-pretnje-novinarima-i-novinarkama-i-novi-pritisci-na-medijske-slobode.

[33] See: https://n1info.rs/vesti/nuns-serija-pretnji-novinarima-profesorima-i-medijima-zahteva-hitnu-reakciju-drzave.

Action Points

- **In the digital platform alignment process, state authorities should increase support to existing escalation channels** (often in the form of trusted partners, such as the Media Center in Sarajevo), to ensure more systematic assistance to journalists and citizens, moving beyond currently available *ad hoc* arrangements**.** Similarly, dedicated appeals mechanisms should be established to handle safety-related complaints raised by journalists and potentially intersected with the work of safety mechanisms for the protection of journalists. As a starting point, for example in North Macedonia, but also relevant in the region, an overview should be prepared providing assessment of the existing mechanisms for reporting and responding to online threats against journalists, and any gaps, particularly around co-ordination, digital threats and gender-sensitive protection.
- **Ensure human rights and media freedom safeguards** in the process of alignment with **Article 4** (protection of journalistic sources) of the EMFA within national legislative systems. In Albania, the ongoing criminal-procedure reform should also be reviewed for its effects on access to journalists' devices, communications and source-identifying material. Safeguards should distinguish seizure from examination of digital data, ensure independent review before confidential sources are exposed, provide effective remedies, and apply a contextual proportionality test to restrictions on reporting criminal proceedings.[34]
- Existing criminal law provisions against online violence, including those addressing **gender-specific threats**, **should be effectively enforced in practice**, while related offences such as doxxing should also be recognized, including offences that are **facilitated or enabled by generative AI.** Any new offence should be precisely defined and include safeguards for public-interest reporting, so that legitimate publication of information is not criminalized through an overbroad scope of the criminal act.
- Ministries in charge together with the dedicated working groups need to ensure that any legislative intervention includes **pre-legislative and regular human rights impact assessments** that address risks specific to media freedom, including gender-based violence.

[34] A criminal-procedure consultation is currently taking place in Albania, the record can be found under https://www.konsultimipublik.gov.al/Konsultime/Detaje/1056. EMFA Article 4 is a relevant alignment benchmark, alongside Article 10 ECHR and the ECtHR's source-protection case law.

A Vision for the Future/Long-term Interventions

Moving from Mitigation to Transformation

The Policy Manual emphasises that addressing current challenges requires **moving beyond short-term responses towards long-term structural changes in the information ecosystem**, including reducing structural dependencies on dominant platforms and strengthening conditions for a more pluralistic and resilient media environment.[35] A long-term perspective also invites a shift in how the information ecosystem is imagined. Rather than remaining dependent on a limited number of dominant Big Tech platforms and technology providers, a more resilient model would ensure that the production, distribution, and monetization of journalism is based on a diversity of actors, including media, content creators, and alternative infrastructures, supported by public interest- and innovation-driven media ecosystems.

Part of this shift concerns the rising relevance, particularly in the online information ecosystem, of content creators such as influencers outside traditional legacy media. Rather than presenting an immediate regulatory challenge, the rise of content creators can be understood as part of wider shifts in how information is produced, distributed, and consumed and calls for long-term systemic interventions. While not directly addressed in the Policy Manual, these developments **challenge traditional distinctions between media and other content producers, and opens space for considering how principles such as transparency, accountability, and contribution to the public interest may apply across a broader range of actors.**

At the same time, different regulatory approaches to influencers are beginning to emerge across Europe. In Italy,[36] influencers are increasingly being integrated into existing regulatory media frameworks, with obligations related to transparency, advertising disclosure, and responsibility for content. In Spain,[37] they are being defined as a distinct category of actors subject to specific legal and self-regulatory requirements. In the Western Balkan region, North Macedonia[38] has taken initial steps towards formalising the role of influencers by introducing a regulatory approach that applies certain media-related obligations to a limited group of content creators who meet specific criteria, such as audience reach, regular content production, and income generation. Under this approach, some influencers may be treated similarly to audiovisual media service providers, with obligations related to transparency, advertising disclosure, and protection of minors – and potentially also benefitting from media protection measures as proposed in the Policy Manual. At the same time, the framework remains subject to ongoing debate, particularly

[35] OSCE *Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*, Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, 2025, p.132, available at: https://rfom.osce.org/representative-on-freedom-of-media/598525.

[36] ECC-Net Italia, Influencers: AGCOM introduces the New Code of Conduct, https://ecc-netitalia.it/en/news/influencers-agcom/.

[37] European Audiovisual Observatory, *Spain: Influencer regulation under LGCA and Royal Decree 444/2024,* https://merlin.obs.coe.int/article/10406.

[38] Gazeta Express, *New regulatory framework for influencers in North Macedonia*, https://www.gazetaexpress.com/en/new-regulatory-framework-for-influencers-in-Macedonia/.

regarding its proportionality and potential impact on freedom of expression and digital entrepreneurship.[39]

These developments suggest that the question is not whether the role of content creators and influencers will be legally addressed, but how different regulatory and policy approaches will evolve, and how they will balance innovation, accountability, and freedom of expression safeguards.

In addition to considerations of mitigating existing and emerging harms caused by the Big Tech captured information ecosystem, discussions are gradually emerging around the development of public interest-oriented digital infrastructure as a longer-term response to structural dependencies on dominant platforms. This includes exploring alternative distribution models, strengthening direct relationships between media and audiences, and supporting more sustainable and independent media ecosystems, as well as strengthening investment in media innovation, public service media, and interoperable, public interest-oriented digital infrastructures. These discussions and explorations should be nurtured. At the same time, co-operation and knowledge-sharing across the media sector should be strengthened, as well as recognition of audiences as active participants in shaping the information environment.

The implementation of the OSCE Policy Manual and stronger co-operation between OSCE regions, state and non-state actors can provide a useful impetus for these conversations – while cognizant of potential regional ambivalence on one hand and potential political capture of these discussions.

Leverage Regional Co-operation to Incentivize Alternative, Pluralistic Information Ecosystems

Given the shared challenges and interconnected nature of media spaces across the Western Balkans and South East Europe, regional co-operation is likely to play an increasingly important role. In addition to international human rights standards and consensual OSCE commitment, States' regional or otherwise joint initiatives can provide important impetus. In 2023, for example, a coalition of 45 OSCE participating States[40] committed to urging digital platforms to better uphold their responsibilities, particularly in relation to the rights of women journalists, and to align their policies with human rights standards. Such approaches can help move beyond reliance on platforms alone to manage systemic risks, and instead supporting a broader ecosystem of accountability, including journalists, content creators, civil society, researchers, and users, equipped with the tools, rights, and institutional support necessary to contribute to a more transparent and trustworthy information space.[41]

This Implementation Guide supports **regional co-operation and exchange of good practices**, including through multi-stakeholder mechanisms facilitated by OSCE Field Operations and the

[39] Agency for Audio and Audiovisual Media Services (AVMU), *Guide for Influencers, Vloggers and Content Creators*, https://shorturl.at/4xENl.
[40] *OSCE Policy Manual on Safeguarding Media Freedom in the Age of Big Tech Platforms and AI*, Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, 2025, p.119, available at: https://rfom.osce.org/representative-on-freedom-of-media/598525.
[41] Ibid, p. 134.

Office of the Representative on Freedom of the Media (RFoM). Such co-operation should also contribute to strengthening **accountability frameworks for large technology companies**, consistent with international human rights standards.

Action Points Matrix

This Matrix consolidates the action points from the Regional Implementation Guide into a single implementation matrix, organised by thematic area (Media Visibility, Media Viability, Media Vigilance, and Long-Term Vision), indicating the responsible stakeholder, an approximate timeframe for each recommendation, as well as suggested concrete steps, where appropriate. Timeframes are the authors' estimate: short-term (already actionable or ongoing), mid-term (requires new legislation, capacity, or institutional set-up; approximately 2-3 years), long-term (requires structural or systemic change, new institutions, or sustained regional co-ordination; approximately 5-7 years). Each country should validate the lead institution, legal basis and resources for each action. Implementation plans should record a baseline, measurable outputs and review dates; practical support and voluntary platform dialogue can begin while legislative reforms are pending.

Media Visibility

Area	Action Point	Responsible Stakeholder(s)	OSCE Policy Manual Reference	Timeframe	Concrete Steps
Media Visibility	Address co-ordinated manipulation of information flows and visibility during elections; ensure access to reliable public-interest information; recognize and respond to risks of Foreign Information Manipulation and Interference (FIMI) through co-operation with non-state actors and regional partners.	States / electoral authorities, with civil society and regional partners	*§5.2 - "Sufficient safeguards" (preventing political/platform capture)*	Short-term	Montenegro: AEM and the State Election Commission adopt a pre-election platform-co-ordination mechanism modelled on Moldova's DSA framework, requiring platforms to submit pre-election risk assessments and designate a rapid-response contact point at least six months before the 2027 general elections.
Media Visibility	Establish a transparent, accountable, rights-based regulatory environment for content moderation, aligning national frameworks with fundamental rights standards and enforceable platform-governance rules.	States / national legislators	*§5.2 - overall considerations for visibility policies*	Mid-term	Albania: map the proposed AKEP co-ordination role and sectoral responsibilities under draft Articles 49-50; assess independence, staffing and complaint referrals with media and civil society input.
Media Visibility	Ensure effective implementation of DSA-aligned transparency and redress safeguards: statements of reasons for moderation decisions, accessible internal complaint mechanisms, and	States / media regulators	*§5.2 - "Further visibility policies with robust safeguards"*	Mid-term	Use Serbia's plan to draft Law on Digital Services as the entry point to embed statements-of-reasons and independent dispute-settlement provisions from the outset. In Albania, review the consulted draft against these safeguards and

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	operational independent out-of-court dispute settlement bodies.				publish how media-sector consultation input has been addressed.
Media Visibility	Protect journalistic content in line with EMFA safeguards - advance notice and clear justification before enforcement action is taken against media content, subject to Article 18 eligibility requirements and exceptions.	States / media regulators; platforms (compliance)	*§5.1 - Policy and Regulatory Initiatives to Strengthen Visibility*	Mid-term	Distinguish moderation under platform terms from action concerning illegal content; provide guidance for eligible media providers and preserve general appeal rights for other users.
Media Visibility	Require comprehensive transparency of all forms of moderation, including content removal, restriction, and visibility-reduction measures such as shadow-banning and algorithmic down-ranking.	States / media regulators; platforms	*§5.2 - "Visibility policies" (disclosure of ranking criteria/algorithms)*	Short-to-mid-term	Require platforms operating in-market to disclose ranking/recommender criteria to the national media regulator on request; pair with a prominence safeguard for public-interest content as digital-platform alignment legislation is drafted.
Media Visibility	Strengthen institutional capacity to assess AI-driven moderation systems under applicable DSA-aligned rules and relevant EU AI Act requirements, evaluating impacts on fundamental rights, media pluralism, and democratic processes.	Media regulators / independent oversight bodies	*§5.2 - "Visibility policies for generative AI"*	Mid-term	
Media Visibility	Establish independent, multi-stakeholder oversight mechanisms at national or regional level to enable independent monitoring, review, and mediation of platform practices.	States (establishment); regulators, media, civil society, academia (participation)	*§5.2 - "Sufficient safeguards" (independent authorities/enforcement)*	Mid-to-long-term	Replicate the "Privacy4Balkans" model – the joint Serbia-BiH-Montenegro-North Macedonia data-protection co-ordination on platform representation – for visibility/moderation oversight, starting with a shared regional monitoring mechanism co-ordinated through OSCE field engagement.
Media Visibility	Ensure access to fair and effective remedies for media actors, including platform-based complaint systems and independent review or mediation mechanisms.	States / media regulators; platforms	*§5.2 - "Further visibility policies with robust safeguards" (appeal mechanisms)*	Mid-term	Albania and other small language markets: support human review of local-language context and abusive reporting, with independent assistance for newsroom appeals; monitor response times and outcomes without exposing sources.

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Media Visibility	Ensure ranking and recommender systems do not sideline public interest journalism: embed disclosure obligations for ranking/recommender criteria and a prominence safeguard for public-interest content in ongoing DSA-alignment laws, and develop a joint regional position on how AI-mediated search and discovery affects referral traffic to news outlets.	States / national legislators; media regulators; media associations (regional co-ordination)	*§5.2 - "Visibility policies for generative AI"*	Short-to-mid-term	Use the DSA-transposition laws currently being adopted (Montenegro), reviewed following consultation (Albania) or prepared (Serbia) as the vehicle for disclosure and prominence-safeguard provisions; in parallel, WB media regulators and media associations should develop a joint regional position, co-ordinated through the OSCE where feasible, on the impact of AI search summaries on referral traffic, to inform generative-AI provisions in national AI laws (e.g. Serbia's ongoing AI law drafting process). Albania's draft Article 27 provides a starting point for assessing recommender transparency; any additional prominence measures need transparent criteria and safeguards for editorial independence.

Media Viability

Area	Action Point	Responsible Stakeholder(s)	OSCE Policy Manual Reference	Timeframe	Concrete Steps
Media Viability	Regularly conduct media pluralism and market assessments, informing domestic enforcement and legally available co-operation with European authorities.	Media regulators / competition authorities	*§6.2 - "Address market concentration in advertising"*	Short-term (recurring)	Use existing national impact assessments, including materials accompanying Albania's consulted drafts, to inform a regional baseline. Validate their coverage of media pluralism and market conditions before treating them as media-market assessments. The Independent Media Commission and Kosovo* Competition Authority could, in co-operation with the media sector and self-regulatory body, conduct a first assessment of digital advertising flows and platform dependences.

Area	Action Point	Responsible Stakeholder(s)	OSCE Policy Manual Reference	Timeframe	Concrete Steps
Media Viability	Equip media regulators and/or competition authorities with resources – mandate, expertise, financial capacity – to investigate and follow up on media viability issues.	States (funding); media regulators / competition authorities	*§6.2 - "Ensure fair compensation" (independent oversight, proportionate sanctions)*	Mid-term	Address concrete capacity gaps first as a precondition to assigning new investigative mandates.
Media Viability	Align copyright legislation with the EU DSM Directive, including Article 15 (press publishers' related right) and Article 4 (text and data mining exception with machine-readable rights reservation).	States / national legislators	*§6.2 - "Ensure fair compensation" (copyright as policy avenue)*	Mid-term	Preserve Article 3's scientific-research exception and Article 15's scope and exclusions; distinguish the Manual's proposed opt-in model from existing statutory rules.
Media Viability	Use ongoing AI-law drafting processes (e.g. Serbia) to introduce obligations for providers of general-purpose AI models mirroring the EU AI Act, including published training-data summaries and copyright-compliance policies.	States / national legislators	*§6.2 - "Address generative AI" (the right to know)*	Mid-term	Engage the Ministry of Science AI law working group during its early-2026 drafting phase to secure a binding deadline for general-purpose AI providers to publish training-data summaries and copyright-compliance policies. Include Albania's consulted AI draft in the comparison; verify the current stage of each legislative process and distinguish Article 53 transparency duties from separate compensation rights.
Media Viability	Explore AI-adapted compensation mechanisms (copyright levies, data-use levies, collective licensing schemes); leverage regional co-operation among media associations and regulators when negotiating with AI deployers.	Media associations / regulators (regional co-operation)	*§6.2 - "Address generative AI" (right to fair compensation) / "Digital services tax"*	Long-term	Commission a joint WB feasibility study, before any single country legislates unilaterally, covering (i) a co-ordinated digital services tax approach and (ii) alignment with the EU's reduced-VAT treatment of digital news publications.
Media Viability	Support existing or new collective management organizations able to negotiate AI licensing and enforce related rights on behalf of publishers, with attention to including small, local, and nonprofit media.	Collective management organizations / media associations	*§6.2 - "Ensure fair compensation" (collective bargaining)*	Long-term	
Media Viability	Equip media regulators and competition authorities with technical/financial capacity and	Media regulators / competition	*§6.2 "Ensure fair compensation"*	Mid-to-long-term	

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	mandate to oversee and enforce fair compensation and bargaining outcomes between media organizations and AI providers, including monitoring compliance with negotiated agreements and preventing asymmetric bargaining power for smaller media; prioritize regional co-operation through joint capacity building, knowledge exchange, and investigations.	authorities (regional co-operation)	*(bargaining outcomes enforcement)*		
Media Viability	Integrate AI-specific considerations into ongoing human rights impact assessments and legislative processes (e.g. North Macedonia, Albania) at an early stage, so press-publishers' rights and compensation mechanisms are built in.	States / national legislators / relevant regulators and non-state stakeholders	*§6.2 - "Address generative AI"; cross-ref. §8.2 (state-intervention principles)*	Short-term (time-sensitive)	Use the live legislative windows in North Macedonia, Albania and Kosovo* – which are already running RIA/impact-assessment processes – to insert AI and press-publisher provisions. Assess media safeguards through remaining legislative and implementation stages. In Albania, follow-up the completed AI and digital-services consultations, including consultation feedback and any revised text.
Media Viability	Use tax policy as a media-sustainability tool: extend reduced VAT rates already applied to print journalism to digital news subscriptions and access, and explore a co-ordinated regional approach to digital services taxation and disinformation demonetization.	WB finance ministries; media associations and regulators (regional co-ordination)	*§6.2 - "Support the diversification of revenue streams for media"*	Short-term (VAT) / Mid-term (regional study)	As part of ongoing EU accession harmonization, WB finance ministries confirm that reduced VAT rates already applied to print journalism are extended to digital news subscriptions and access. In parallel, media associations and regulators, co-ordinated through OSCE field engagement, commission a joint feasibility study covering (i) a co-ordinated approach to digital services taxation and (ii) a regional demonetization commitment modelled on the EU Code of Practice on Disinformation, before any individual country legislates unilaterally.

Media Vigilance

Area	Action Point	Responsible Stakeholder(s)	OSCE Policy Manual Reference	Timeframe	Concrete Steps
Media Vigilance	Monitor online violence against journalists through existing safety mechanisms and prosecution units (e.g. the Bosnia and Herzegovina model); require platforms to provide disaggregated data on safety risks and responses, on a clear legal basis and with privacy safeguards.	National safety mechanisms / judiciary and law enforcement	*§7.2 - "Legislative and policy interventions" (monitor + mandate platform data)*	Short-term	Extend BiH's existing prosecution-unit monitoring model regionally. Follow up on the protocols for safety of journalists signed in Montenegro in October 2025. Utilize the established working group with the mandate to operationalize the national press safety mechanism (funding, structure and legal anchoring).
Media Vigilance	Develop and implement holistic, gender-sensitive safety protocols within prosecution and investigation units, with a focus on digital threats and participation of women journalists and underrepresented groups.	States / prosecution and law enforcement units	*§7.2 - "Safety by design" / "Legislative and policy interventions" (tech-facilitated GBV)*	Mid-term	Complement police and prosecutorial measures by strengthening support within newsrooms. Work also with media employers and editors to respond to online threats. In Kosovo*, for example, follow-up to the AJK/Network of Women Journalists report on women in media and gender-based disinformation to develop practical newsroom procedures on confidential reporting, documentation of digital threats, management support and referral to appropriate assistance.
Media Vigilance	Strengthen co-ordination across national, regional, and international initiatives, including structured engagement with platforms to improve accountability and responsiveness.	States / regional bodies (OSCE) / platforms	*§7.2 - "Inclusive and meaningful multi-stakeholder models of safety"*	Mid-term	Model this on "Privacy4Balkans" (Serbia, BiH, Montenegro, North Macedonia data-protection authorities jointly pressing Meta and X on regional representation) - draw on this model to develop an inclusive regional co-ordination mechanism.
Media Vigilance	Ensure sustainable financial support for journalist safety mechanisms, including trusted escalation channels and partner organizations, to guarantee long-term effectiveness.	States (funding)	*§7.2 - "Inclusive and meaningful multi-stakeholder models of safety" (sustainable financing)*	Short-to-mid-term	

Area	Action Point	Responsible Stakeholder(s)	OSCE Policy Manual Reference	Timeframe	Concrete Steps
Media Vigilance	Establish a dedicated solidarity fund to support journalists and media workers targeted by online violence.	States / media associations / donors	*§7.2 - "Legislative and policy interventions" (dedicated solidarity fund)*	Long-term	Seed the fund through a mixed model: a small share of any future WB digital services tax revenue (see Media Viability, Action Point 6) combined with donor contributions, administered independently of government to preserve trust.
Media Vigilance	Support existing escalation channels, often trusted partners such as the Media Center in Sarajevo, and establish dedicated appeals mechanisms for safety-related complaints raised by journalists.	Civil society / trusted partner organizations	*§7.2 - "Inclusive and meaningful multi-stakeholder models of safety" (escalation channels)*	Short-to-mid-term	
Media Vigilance	Ensure human rights and media freedom safeguards in the process of national alignment with EMFA Article 4 (protection of journalistic sources).	States / national legislators	*§7.1 - Policy and Regulatory Initiatives to Strengthen Vigilance*	Mid-term	Albania: assess the criminal-procedure draft alongside digital reforms for device access, source confidentiality and reporting restrictions; identify safeguards for independent review and effective remedies before adoption.
Media Vigilance	Ensure effective enforcement of existing criminal law provisions against online violence, including gender-specific threats, and recognize related offences such as doxxing, including where facilitated by generative AI, using precise definitions and safeguards for public-interest reporting.	States / judiciary and law enforcement	*§7.2 - "Legislative and policy interventions" (criminal provisions apply online)*	Short-term	
Media Vigilance	Ensure any legislative intervention includes pre-legislative and regular human rights impact assessments addressing risks specific to media freedom, including gender-based violence.	States / national legislators	*§7.2 - "Legislative and policy interventions" (pre-legislative HR impact assessments)*	Short-term (procedural, applies going forward)	
Media Vigilance	Provide financial and institutional support to independent media actors and organizations acting as first responders and bystanders to online violence against journalists, while fully safeguarding their independence.	States (through existing project support mechanisms)	*§7.2 - "Inclusive and meaningful multi-stakeholder models of safety" (sustainable financing)*	Short-to-mid-term	

Long-Term Vision

Area	Action Point	Responsible Stakeholder(s)	OSCE Policy Manual Reference	Timeframe	Concrete Steps
Long-Term Vision	Explore regulatory approaches to content creators and influencers - transparency, advertising disclosure, protection of minors -- balancing innovation, accountability, and freedom of expression, drawing on emerging models in Italy, Spain, and North Macedonia.	States / national legislators and self-regulatory bodies	*§8.1 "A New Way of Thinking" (not directly addressed in the Manual)*	Long-term	Explore North Macedonia's existing influencer framework (audience-reach/income thresholds triggering AVMS-style obligations) as a regional example.
Long-Term Vision	Develop public interest-oriented digital infrastructure as a longer-term response to platform dependency: alternative distribution models, direct media-audience relationships, investment in media innovation and public service media.	States / media sector / civil society (joint)	*§8.3 - Structural Changes and Investment to Move Beyond*	Long-term	Pilot shared training and practical newsroom policies on AI verification, editorial responsibility, copyright and source confidentiality, with media associations, journalism schools and public service media; assess participation and uptake before expansion.
Long-Term Vision	Leverage regional co-operation – OSCE Field Operations and RFoM multi-stakeholder mechanisms – to incentivize alternative, pluralistic information ecosystems and strengthen accountability frameworks for large technology companies.	States / OSCE field operations and RFoM / civil society	*§8.2 - Considerations for State Intervention*	Long-term	Formalize this through a standing OSCE-facilitated working group meeting at least twice yearly, rather than *ad hoc* engagement, to give the accountability frameworks referenced here an actual institutional home.