

Disinformation in the online sphere

The case of BiH



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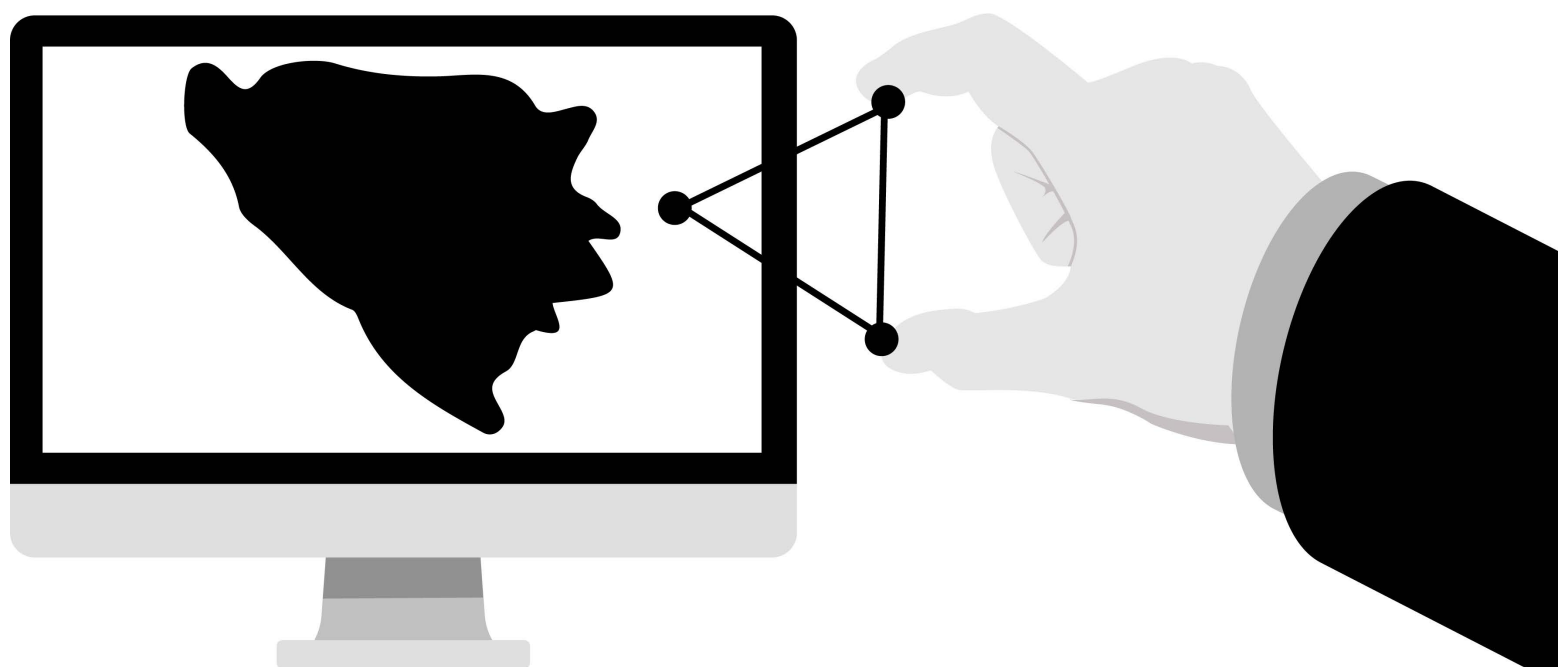
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DISINFORMATION IN THE ONLINE SPHERE: THE CASE OF BIH



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EXECUTIVE SUMMARY

DISINFORMATION IN THE ONLINE SPHERE: THE CASE OF BIH

In December 2018, the European Union adopted the Action Plan against Disinformation, recognizing disinformation as a serious threat to democratic processes and citizens' security and well-being. These activities have not been paralleled in the Western Balkans region.

Using a novel and unique methodology which combines fact checking and data analysis, this research into the scale and scope of disinformation in online media is the first of its kind in Bosnia and Herzegovina. Based on material from more than **450 digital media outlets**,¹ it provides insight into patterns of creation and distribution of disinformation targeting the citizens of BiH, as well as its neighboring countries.

KEY FINDINGS

False or misleading media reporting is highly present in BiH and the region, most often in the form of "fake news" - **intentionally fabricated false information** - which accounts for almost a third of all disinformation analyzed in this research.

More than **60% of all false or misleading media content** deals with issues which are political in nature.² The research points to two major sources of such disinformation online:

- 1) "**opportunistic disinformers**", who operate mostly through anonymous websites and social media, with financial gain as their primary motive;
- 2) **political and state actors**, who utilize both public and commercial media outlets to spread disinformation to advance their political agenda.

The congruence of media disinformation and specific political interests raises concerns over targeted disinformation campaigns in the online sphere, some related to foreign actors and sources. Conversely, the key stakeholders have **low awareness of such influences**, despite being acutely aware of the overall problem of disinformation in the media.

¹ The material used in the research was scraped from the data base of the media fact-checking platform Raskrinkavanje (raskrinkavanje.ba). It includes analysis of media reports (fact-checks) produced over the course of one year.

² In the time span of one year, raskrinkavanje.ba has rated a total of 3,592 media manipulations. Out of that number 2,228 cases refer to misleading content which is political in nature.

SOURCES OF DISINFORMATION

Anonymous websites are the type of media which appears as the main source and redistributor of disinformation online. Their activity creates a virtual eco-system where disinformation almost instantly reaches large audiences, due to their proliferation, intense content production and significant reach on social media. Anonymous online portals account for **two thirds of disinformation sources** tracked in this research.

In most of the cases, the primary motive for producing such content is commercial gain which anonymous website owners obtain from online ads. However, several anonymous outlets traced in the research appear to be established by political actors as tools to attack political opponents using false information and inflammatory accusations. The anonymity of these outlets is used to avoiding public scrutiny and accountability for such actions.

Public media are the largest **individual sources** of disinformation in BiH. The research shows that **public media frequently use anonymous websites** as both sources and amplifiers of disinformation they publish. Two public outlets (*RTRS* and *Srna* agency) stand out as single most prolific sources of disinformation in BiH. Public media from other countries also appear as significant sources of disinformation pertaining to BiH.³

DISINFORMATION HUBS

Most of the sources of political disinformation are media based in BiH. There is, however, an alarmingly high number of media from neighboring countries which appear in the analyzed sample through their connections with BiH-based media outlets, using each other as sources and redistributors of disinformation.

These media outlets form a large disinformation "hub", used by local and possibly foreign political actors to influence public opinion in BiH and the region with considerable regularity and frequency.

The disinformative content produced by this "network" relates both to political issues in Bosnia and Herzegovina and to geopolitical issues and events in the region, shaping them predominantly through anti-Western lens. Out of **29 media** in this hub, **15 are located in Serbia and 14 in BiH (out of which 12 in Republika Srpska)**. Russian government-owned media outlet "Sputnik" (Serbian edition) is the only foreign-owned media in this disinformation hub, appearing as one of the main "connectors" of media located in Serbia and those located in Republika Srpska.

³ About **10 media outlets** (7 located in BiH and 3 located in Serbia) are responsible for more than a third of all disinformation analyzed in this sample.

TARGETS OF DISINFORMATION PRODUCED BY INTERCONNECTED MEDIA OUTLETS

The USA-based entities, specifically actors related to the previous US administration, appear to be the main targets of disinformation related to international matters produced by the main disinformation “hub”.

The EU is still mostly present as a neutral and/or desirable actor in the content of disinformation analyzed in this research. When it comes to EU member states, those which are seen as destination for economic migrations are portrayed in a positive light, while the overall view of EU as a “value system” is portrayed in a negative light and presented as undesirable for local cultures.

Conspiracy theories are the most frequent type of manipulation used in this type of content. They occasionally target unspecified EU actors, but are predominantly focused on individual states, in particular Great Britain, repeatedly accused of conspiracies against Republika Srpska and/or its former president Milorad Dodik.

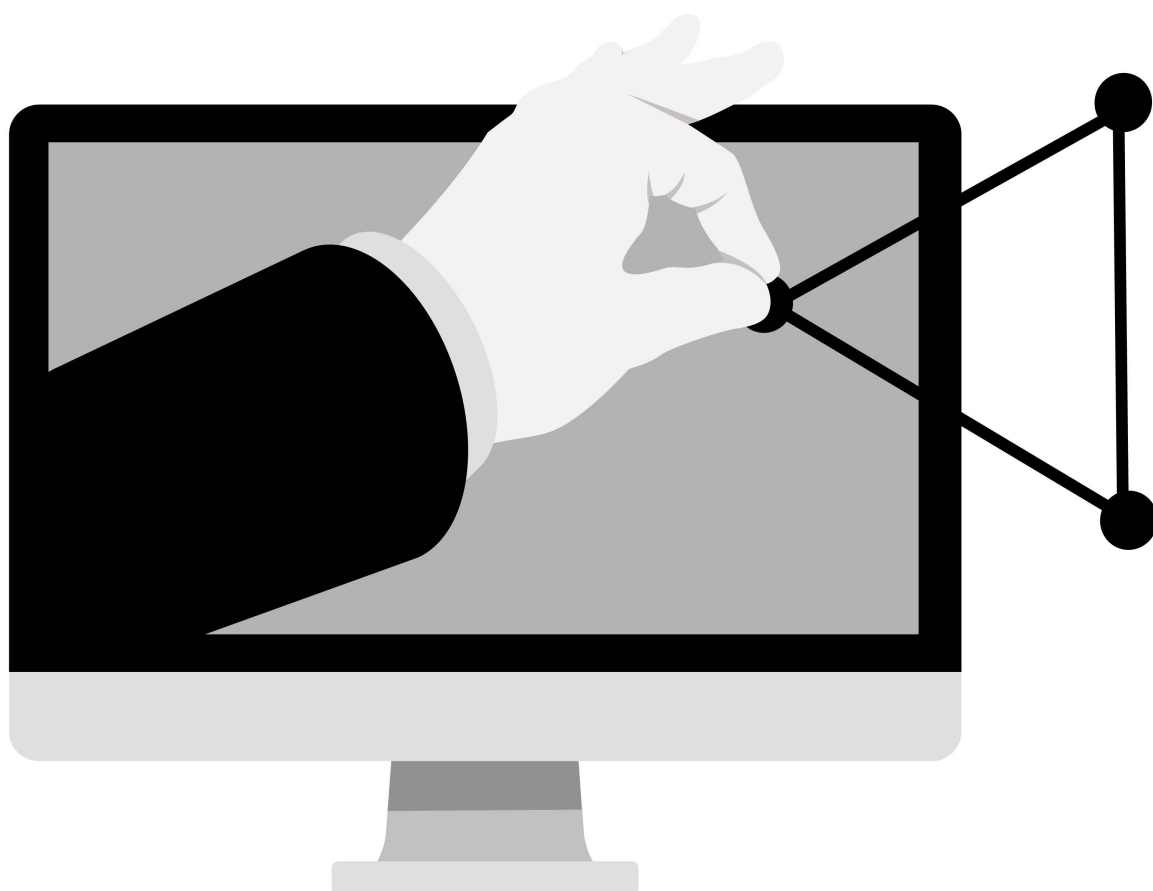
AWARENESS OF THE DISINFORMATION PHENOMENON AMONG STAKEHOLDERS

A total of 16 interviews with representatives of relevant institutions, regulatory and self-regulatory bodies, media professionals and academics in the field, show a high level of awareness of the problem of disinformation in the local media. However, it is seen **only in context of media professionalism and media independence**.

There is little or no awareness of disinformation as a problem developing in context of hybrid threats. There is also little recognition of the role played by major internet/data companies and the need for BiH/the region to have a voice in the ongoing conversations with those entities.

DISINFORMATION IN THE ONLINE SPHERE:

THE CASE OF BIH



Document before you is a result of research into the various aspects of the phenomenon of political disinformation in the media in Bosnia and Herzegovina and the region.

The research was conducted from November 2018 to January 2019 and is dominantly based on the material produced by a year-long work of the BiH based fact-checking platform **Raskrinkavanje**.⁴

⁴ **Raskrinkavanje** (raskrinkavanje.ba) is a media fact-checking platform run by U.G. *Zašto ne* (CA Why Not), a citizens' association from Sarajevo, BiH. It was launched in December 2017, with the first fact-checking analysis published in November 2017.

1. DISINFORMATION: GLOBAL CONTEXT AND IMPLICATIONS

The term “political disinformation”, as used in this report, corresponds to a large degree to the more broadly used term “fake news”, described by various EU documents as “simplification of the complex problem of disinformation”.⁵ Before getting into their respectful definitions, it is important to stress the difference between a lie⁶ (as opposed to the category of **truth**) and a factual error (as opposed to the category of **accuracy**). A piece of information which does not correctly present facts is by definition **inaccurate**, but it is not necessarily a **lie**. Inaccurate information can be communicated “in good faith”: a person can make a factually incorrect statement believing it to be true. The *intent to mislead* is what separates these two categories and is also a crucial element of political disinformation, i.e. “fake news”.⁷

In the European Commission's Action Plan against Disinformation, the term disinformation is defined as:

“...verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm [including] threats to democratic processes as well as to public goods such as Union citizens' health, environment or security”.⁸

This definition also highlights *malicious intent* as one of defining elements of disinformation, excluding other types of information of questionable accuracy which appear in the public realm:

“Disinformation does not include inadvertent errors, satire and parody, or clearly identified partisan news and commentary.”⁹

Looking into this and other definitions of the term “disinformation”, the designation “political” may seem redundant. For example, the Merriam-Webster Dictionary defines it as:

“False information deliberately and often covertly spread (as by the planting of rumors) in order to influence public opinion or obscure the truth”.¹⁰

In English language, as noted in Merriam-Webster definition, the term is believed to be a literal translation of a Russian word “*dezinformatsiya*”, used by the KGB¹¹ to name the agency's department charged with placing false information either as part of a state propaganda or as “active measures” against political and military adversaries during the

⁵ European Commission. “*Factsheet: Tackling The Spread Of Disinformation Online.*” October 2018. <http://bit.ly/2EC2ct6>.

⁶ In BHS, the term “*fake news*” translates to “*lažna vijest*”, coming from the word “*laž*” (a lie).

⁷ In the ratings system of *Raskrinkavanje*, the terms disinformation and fake news are also used as fact-checking ratings, with a more specific meaning. More in *Annex 1: Methodology*.

⁸ European Commission High Representative of the Union for Foreign Affairs and Security Policy. “*Action Plan against Disinformation.*” Brussels. December 2018.

⁹ Ibid.

¹⁰ “*Disinformation.*” In Merriam-Webster Online. <https://bit.ly/2GK0Yh3>.

¹¹ “*Komitet Gosudarstvennoy Bezopasnosti*”, the main intelligence/security agency of the Soviet Union.

Cold War (mainly in and against the USA). This corresponds to a testimony of a former director of KGB's disinformation department, Larry Martin, who describes disinformation as "deliberately distorted information that is secretly leaked into the communication process in order to deceive and manipulate".¹²

This geopolitical context of disinformation and/or "fake news" has come back to dominate the global conversation about the phenomenon in the past few years – specifically since 2016, when two globally significant political processes took place. Both were notably shaped by continuous use of false information by the winning camps: one was the UK referendum on leaving the European Union, known as "Brexit" and the other was the Presidential Election in the United States of America. The US elections were, undoubtedly, more consequential in relation to raising awareness about the phenomenon and shaping the discourse on "fake news" in the Western countries. In the aftermath of the US elections, several investigations, carried out by both US law agencies and investigative journalists, pointed to a targeted disinformation campaign waged as a part of Russian Federation's effort to influence the outcome of US elections and/or instigate political crisis and discord in the country. A series of media and official reports were published about activities undertaken in the campaign, such as: hacking of the Democratic National Committee servers and releasing their emails through WikiLeaks; creating fake news stories about US political actors and promoting them on social networks alongside targeted political ads; using fake or automated social media accounts to amplify the reach of such messaging, and other similar activities performed by "Internet Research Agency", a company from Saint Petersburg which became known as a "troll farm". A link between these activities and microtargeting of social media users (by using their illegally obtained personal information) carried out by the UK company "Cambridge Analytica" is still under investigation, as is the role of Russian state actors in "Vote Leave" Brexit campaign (allegedly aided by the same company). While it remains unclear to what extent these disinformation campaigns had influenced the results of "Brexit" and US elections, all this has contributed to disinformation being observed as one of the tactics of "information warfare", rather than just a media phenomenon.

These and similar investigations also pointed to many risks modern democracies face in the information age, where "hybrid threats"¹³ are increasingly hard to track, respond to, or anticipate.

¹² Adam B. Ellick and Adam Westbrook. "Operation InfeKtion." The New York Times. November 2018. <https://nyti.ms/2V1Qj4K> (As stated in the "New York Times" video series about "Operation InfeKtion", a covert disinformation operation that Martin (formerly Ladislav Bittman) was a part of before defecting to the US. It traces a false story placed by the KGB, that HIV virus was artificially produced by the US military to target African Americans and LGBT people. After it was debunked, then president of U.S.S.R., Mikhail Gorbachev, admitted that the hoax was an "active measure" of KGB and apologized for it.)

¹³ "Hybrid threat." is defined as "an action conducted by state or non-state actors, whose goal is to undermine or harm the target by influencing its decision-making at the local, regional, state or institutional level", which can be carried out in political, economic, military, civil or information domains and include "a wide range of means and designed to remain below the threshold of detection and attribution," but also "below the threshold of formally declared warfare." In "The European Centre of Excellence for Countering Hybrid Threats". <http://bit.ly/2SFncJC>, and in "Action Plan against Disinformation, European Commission High Representative of the Union for Foreign Affairs and Security Policy." Brussels. December 2018. <https://bit.ly/2EqPmBy>.

One of the reasons is that they exploit the inherent vulnerabilities of democratic societies¹⁴ by mimicking the form and content of legitimate political debate, profiting off of categories protected under the human right laws such as freedom of expression, freedom of speech and media freedoms. Another one is the fact that digital and information technologies are developing at a pace far faster than any kind of regulation has been able to follow, particularly when it comes to the challenge of balancing it with protection of freedom of speech and media freedoms.¹⁵

In the online sphere, where conversations about ideas and ideologies are more global than ever, protection of free speech – but also protection of personal data, right to privacy, individual and minority rights, personal and national security – has become the matter of international rather than national approach. With the exception of authoritarian regimes which undertake repressive measures such as online surveillance or limiting and blocking access to certain platforms, the legislatures of nation states are neither up-to-date nor do they have the jurisdiction over the ever-changing global channels of online communication.

Consequently, the tactics applied to abuse those channels for nefarious purposes continue to be steps ahead of any national-level legal response within the boundaries of democratic values. A prominent place in this process is held by big internet/data companies and social networks which have insofar been more a part of the problem than the solution. These global platforms, unlimited by and independent of national online domains, are not accountable to any individual government, nor are they obliged to uphold the same standards of transparency and content regulation in every state in which they operate. Without an organized international approach, that is not likely to change.

Finally, the media markets have undergone tectonic changes with the proliferation of digital technologies, forcing many media outlets to downsize or resort to sensationalist tactics, which fall below the standards of the journalist profession, to attract and keep online audiences.

This has also been a favorable factor for spreading disinformation, consequently contributing to erosion of public discourse, quality of political debate and overall level of trust in the society.¹⁶

¹⁴ European Commission High Representative of the Union for Foreign Affairs and Security Policy. "**Action Plan against Disinformation.**" Brussels. December 2018. <https://bit.ly/2EgPmBy>.

¹⁵ Claussen, Victor. "**Fighting hate speech and fake news, The Network Enforcement Act (NetzDG) in Germany in the context of European legislation.**" *Media Laws*. March 2018. <http://bit.ly/2IFX8YQ>.

¹⁶ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. "**Tackling online disinformation: A European approach.**" Brussels. April 2018. <https://bit.ly/2UQXpco>.

1.1. POLITICAL DISINFORMATION: THE EUROPEAN CONTEXT

The European Union has officially recognized these and similar threats as far back as 2015, following Russian annexation of Crimea and the war in Ukraine which saw the rise in similar disinformation campaigns. In March 2015, the European Council invited the High Representative to develop an action plan to address Russia's ongoing disinformation campaigns¹⁷ which resulted in establishing East Stratcom Task Force in September 2015. In 2016, a Joint Framework on countering hybrid threats was adopted,¹⁸ followed by establishment of EU Hybrid Fusion Cell within the EU Intelligence and Situation Centre to monitor and address hybrid threats, including disinformation. In the same year, the Commission, Facebook, Twitter, YouTube and Microsoft signed a **Code of Conduct on countering illegal hate speech online**.¹⁹ In **March 2018**, the European Council stated that social networks and digital platforms still need to "guarantee transparent practices and full protection of citizens' privacy and personal data."²⁰

European Centre of Excellence for Countering Hybrid Threats was also established in 2017. In the same year, The European Parliament adopted a Resolution asking the European Commission "to analyze in depth the current situation and legal framework with regard to fake news and to verify the possibility of legislative intervention to limit the dissemination and spreading of fake content."²¹ The Commission's High-Level Expert Group delivered its report on the matter in March 2018.²²

The Commission undertook several other actions to tackle the issue of targeted disinformation, such as activities to strengthen media literacy²³ and a broad set of public consultations on the matter.²⁴ In March 2017, the **Joint Declaration on Freedom of Expression and "Fake News", Disinformation and Propaganda**, was adopted by Special Rapporteurs appointed by several international organizations.²⁵

¹⁷ "The European Council stressed the need to challenge Russia's ongoing disinformation campaigns and invited the High Representative, in cooperation with Member States and EU institutions, to prepare by June an action plan on strategic communication. The establishment of a communication team is a first step in this regard." In "European Council conclusions meeting, 19-20 March 2015." *General Secretariat of the Council*. <https://bit.ly/2V5sB91>.

¹⁸ High Representative of the Union for Foreign Affairs and Security Policy. "JOINT COMMUNICATION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL: Joint Framework on countering hybrid threats, a European Union response." Brussels. April 2016. <https://bit.ly/2Gpqr6g>.

¹⁹ Signed in 2016 in line with Framework Decision on combating certain forms and expressions of racism and xenophobia by means of criminal law adopted in 2008. Framework and direct download link for "Code of Conduct" can be found in the 2016 press release. <https://bit.ly/25vWgXU>.

²⁰ European Council. "European Council conclusions meeting, 22 March 2018." *General Secretariat of the Council*. <https://bit.ly/2STFzbK>.

²¹ European Parliament. "Online platforms and the Digital Single Market." June 2017. <https://bit.ly/2P4qJcp>.

²² European Commission. "Report of the High Level Expert Group on Fake News and Online Disinformation." 2018. <https://bit.ly/2p4qjZr>.

²³ European Commission. "The Digital Education Action Plan." Brussels. Adopted in January 2018. <http://bit.ly/2TK8a04>.

²⁴ European Commission. "Synopsis report of the public consultation on fake news and online disinformation." Brussels. April 2018. <http://bit.ly/2lJN4Vk>.

²⁵ The United Nations (UN) Special Rapporteur on Freedom of Opinion and Expression, the Organization for Security and Co-operation in Europe (OSCE), Representative on Freedom of the Media, the Organization of American States (OAS), Special Rapporteur on Freedom of Expression and the African Commission on Human and Peoples' Rights (ACHPR), and Special Rapporteur on Freedom of Expression and Access to Information. "Joint Declaration on Freedom of Expression and "Fake News," Disinformation and Propaganda." March 2017. <http://bit.ly/2tta6yN>.

In April 2018, the Commission issued a Communication to the European Parliament²⁶ which foresaw the adoption of the Action Plan against Disinformation, adopted in December 2018.²⁷

Additionally, several EU member states have undertaken separate actions to counter disinformation in the context of current hybrid threats, with special emphasis on protection of electoral and other democratic processes. Similar activities are ongoing in other states, some raising questions about the boundaries between responding to hybrid threats and protecting political and media freedoms and human rights.²⁸

1.2. DISINFORMATION: THE REGIONAL CONTEXT

These intense activities have not been paralleled in the region known as Western Balkans and/or Southeast Europe, despite its geopolitical position and recent history. The position of former SFRY countries, which remain among the few non-EU states on the continent, makes them a particularly fertile ground for precisely this kind of foreign influence campaigns. There is, however, no comprehensive regional research or data on political disinformation in this context, nor any official policies tackling the matter. While there is an overall consensus in the Western countries that the issue of disinformation, particularly in the online sphere, should be approached as a part of the more complex phenomenon of hybrid threats, there is little recognition of the issue by the state actors, academic community or media professionals in the region.

In case of Bosnia and Herzegovina, the awareness of the issue is even lower than in the surrounding countries. There is little or no recognition that disinformation may pose a "hybrid threat" and public debate on responses to such threats is largely lacking.

This is particularly striking given the country's recent history and the fact that BiH has been a crux of interests and aspirations of its neighboring countries before, during and since the armed conflicts in the 1990's, including their own targeted disinformation campaigns related to wartime propaganda.²⁹ Many of those narratives, especially those propagated by the state-controlled media in Serbia during the nineties, still persist today: global conspiracies attributed to governments of Western countries; their intelligence services presented as "puppet masters" of any local actors who publicly criticized the local authorities; international media presented as propaganda outlets of the same governments; independent local media described as traitors "working for the enemy", etc. The names of the actors have changed and the means of distribution have expanded to the online channels, but the content has remained virtually the same.

²⁶ "Tackling online disinformation: A European approach." April 2018. <https://bit.ly/2UQXpco>.

²⁷ "Action Plan against Disinformation." December 2018.

²⁸ Samantha Bradshaw, Lisa-Maria Neudert, Philip N. Howard. "Government Responses to Malicious Use of Social Media." NATO Strategic Communications Centre of Excellence. Riga, Latvia. November 2018. <http://bit.ly/2N4OvFB>.

²⁹ United Nations. "Situation of human rights in the territory of the former Yugoslavia, Special report on the media (E/CN.4/1995/54)." December 1994.

Again, this is fully congruent with the contemporary disinformation campaigns where the media are presented as tools of “deep state”, working under the orders of political actors and intelligence services.

There is, however, almost no recognition of those patterns by the local media professionals, policy makers, or academic community. In a series of interviews conducted over the course of this research, all the interviewed stakeholders agreed that disinformation is a serious problem for the local media scene and majority consider them to be politically motivated. However, during the conversations about underlying causes of “booming” disinformation, particularly in the online sphere, none of the interviewees have mentioned the possibility of any foreign influence as a contributing factor. The causes of the problem are still interpreted solely in the context of local partisan politics: power struggles between numerous political parties, ethnic animosities inherited from the 1992–1995 war (again, seen as a tool of political parties to consolidate and control their constituencies), using the media to keep a lid on evidence of corruption, bash political opponents, and support the clientelistic politics.

At the same time, the conspiratory mindset of the nineties continues to be legitimized by political actors and amplified by the media they control, as well as the party-line “intellectuals”. Conspiracy theories are equally legitimate topics of “academic papers”, public media reports, obscure online portals, social media “chatter” and the everyday vernacular. As a result, the influence of foreign actors on the local public is, paradoxically, almost exclusively mentioned in that context: in the views of large parts of local populations, the Western media are seen as the main sources of disinformation, political propaganda and information warfare.

FACT-CHECKING

The higher awareness of the problem of disinformation has also drawn more attention to the phenomenon of fact-checking. In some cases, the governments are recognizing fact-checkers as partners in countering disinformation, consequently contributing to the faster development, mutual networking and growth of the “fact-checking movement” worldwide.

Since 2014, when The International Fact-Checking Network (IFCN)³¹ was founded, there are continuous efforts to establish the professional standards in the fact-checking community. Due to the increased demand for accountability, IFCN has published the fact-checking principles as a mandatory standard for its signatories in order to assure the quality of their work. So far, there have been 61 verified signatories of the principles worldwide, 4 of them from this region.

It is encouraging to see that many of the interviewed stakeholders - particularly those who work as journalists or teach journalism at universities - recognize the importance of fact-checking, media monitoring and media analysis as tools for fighting disinformation and as models which should be considered by other stakeholders.

³⁰ The number of fact-checking initiatives has tripled over the past four years, rising from 44 to 149 outlets worldwide. (Mark Stencel and Riley Griffin “Fact-checking triples over four years.”

³¹ Duke Reporters Lab. USA. February 22, 2018. <http://bit.ly/2XrGolc>. IFCN. “Verified signatories of the IFCN code of principles.” Accessed January 8, 2019. <http://bit.ly/2GOU22G>.

2. METHODOLOGY OVERVIEW³²

The sample for this research was obtained from the media fact-checking website *Raskrinkavanje*.³³ The data base extracted from the website was analyzed for content, frequency, scope and patterns of political disinformation which was fact checked over the course of one year (November 20, 2017 to November 20, 2018). During this period, *Raskrinkavanje* has fact checked 2,420 media articles published by 752 media outlets. These articles have received 3,592 ratings on the platform.

Out of that number, **political disinformation** appears in **1,486** articles published by **477** media outlets. The articles containing political disinformation have received **2,228** ratings. This is the sample used for data analysis presented in this report.

RATING SYSTEM

The term "rating" is used in fact checking to summarize and systematize the findings established by verification of facts. For example, the most basic rating for a claim or a statement would be "true" if it corresponds to the facts, or "false" if it doesn't.

In the case of *Raskrinkavanje's* fact-checking methodology, the rating system is more complex. It was designed to identify different types of false or misleading media content, not limited just to explicitly true or explicitly false statements and claims. These are the ratings used on *Raskrinkavanje*:

Fake news – intentional fabrication of factually incorrect information

Redistributing fake news – redistributing of fake news published by other media outlet

Spin – intentional attempt to steer public attention from a current relevant event or information

Disinformation – false or selective presentation of existing information

Manipulation of facts – misleading interpretation of factually correct information

Pseudoscience – presenting non-scientific or pseudoscientific claims as scientific facts

Conspiracy theory – explicit or implicit claim of the existence of a hidden malevolent plan, without presenting evidence for it

Biased reporting – news coverage which advocates or openly favors one side in a dispute or a controversy; and/or portrays another side in a negative light without providing its perspective

Censorship – relevant information intentionally unreported or removed after being published

Clickbait – misleading and/or exaggerated media headlines or social media shares

Hidden advertisement – promotional material presented as news

Unverifiable – claims that can't be verified, mainly due lack of cited or verifiable sources

³² For comprehensive research methodology see: **Annex 1: Methodology**.

³³ Available at: Raskrinkavanje.ba

Satire – clearly declared satirical content which has the potential of being mistaken as genuine news, requiring clarification in such cases

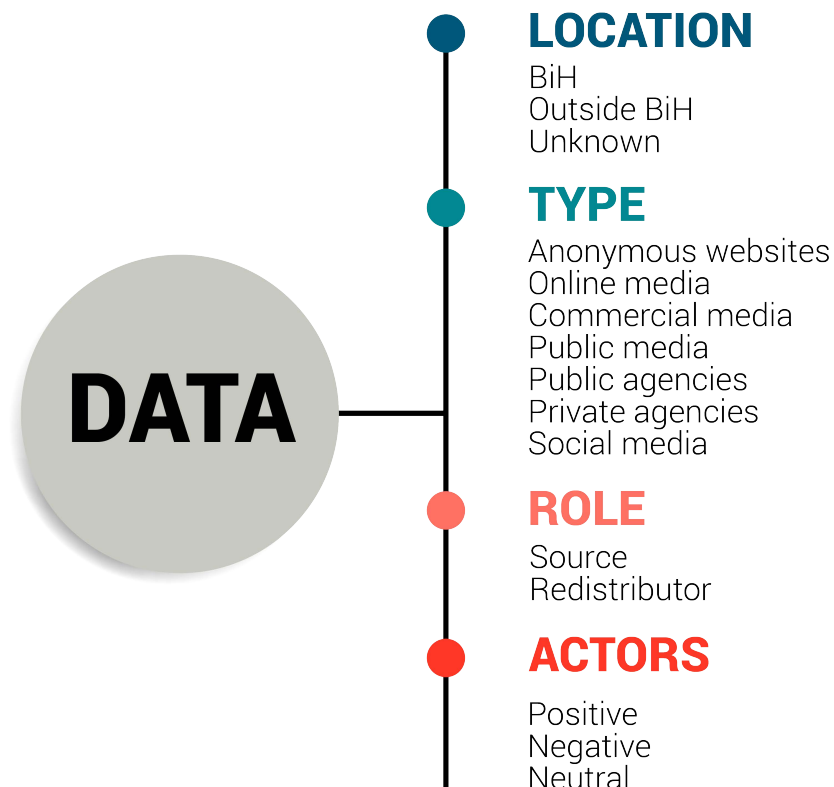
Error – incorrect information published as a result of an unintentional mistake

Corrected – correction of previously published incorrect information

Raskrinkavanje gives a separate rating to each media manipulation which appears in one media report. If, for example, an article has a misleading headline it will be rated as “clickbait”. If the same article contains an explicitly false statement, it will also be rated as “fake news” and both ratings (*clickbait* and *fake news*) will be assigned to the same article in the database. This is why the database contains more ratings than articles.

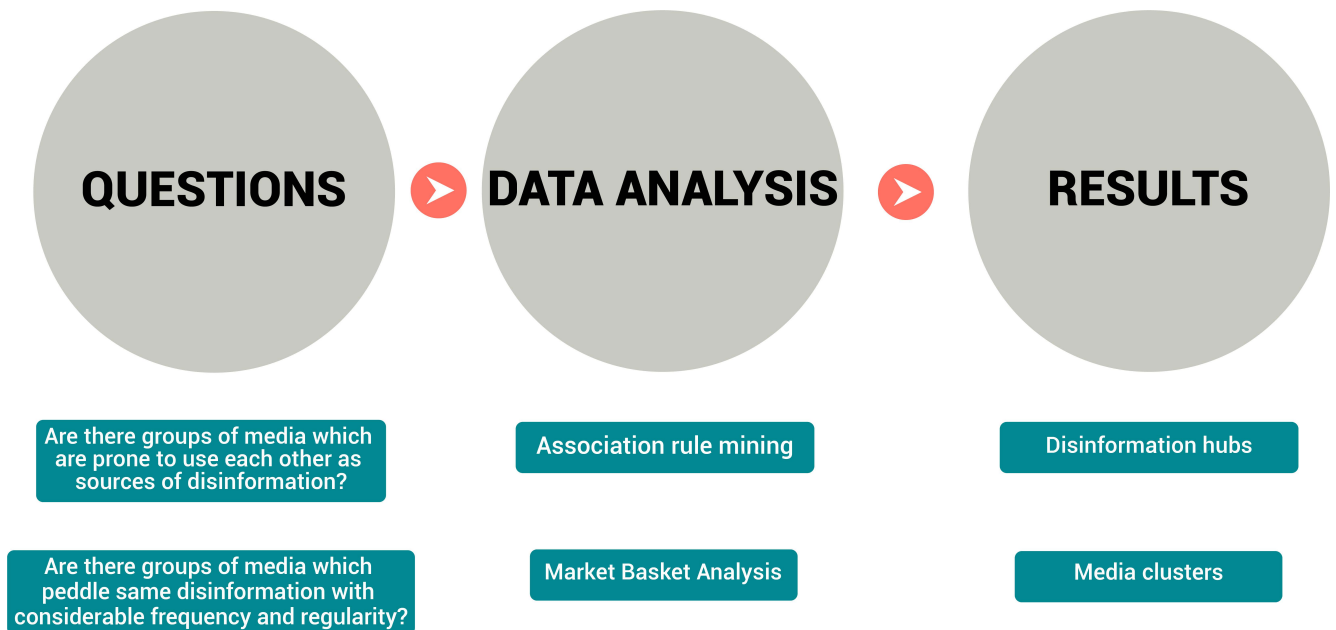
Furthermore, if several media publish the same manipulative content – for example, the same conspiracy theory – all such articles are tracked and fact-checked by *Raskrinkavanje*. Each article will receive the same rating (*conspiracy theory*) and all of them will appear in the same fact checking analysis on *Raskrinkavanje*.

Ratings, articles, fact- checking analysis and names of media outlets create the basic data set of *Raskrinkavanje*. This data was primarily sorted and analyzed to establish how different categories of media participate in creation and dissemination of political disinformation in BiH and the region and what are the subjects of the disinformation they publish.



An in-depth analysis was then performed to establish mutual connections between the media which are the most frequent sources of disinformation, using techniques called “Association rule mining” and “Market Basket Analysis”.

The main goal of this part of the research was to determine if there are groups of media which intentionally publish and redistribute the same political disinformation in a regular, continuous and non-incidental manner.



Additionally, desk research and series of interviews were conducted to provide insights into strengths and weaknesses of existing legal/policy framework and self-regulatory framework in terms of fighting media disinformation, as well as awareness of the problem among relevant stakeholders.³⁴

³⁴ Out of 23 contacted persons, 16 have agreed to an interview, 2 have given a few short remarks over the phone and 5 haven't responded to the interview request. The interviews were conducted with 5 persons from government institutions, 3 from universities' departments of journalism, 1 self regulatory body and 7 journalists and editors.

3. DATA ANALYSIS

3.1. TYPES OF MEDIA MANIPULATIONS

As mentioned above, the ratings are used to specify which type of media manipulation appears in each analyzed article. When it comes to political disinformation analyzed in this research, the type of media manipulation dominant in the sample is **intentionally fabricated false information**. In terms of ratings, these are “Fake news”, appearing **292** times and “Redistributing fake news”, appearing **439** times in the total number of **2,228** ratings. Taken together, they make up for **731** or **32.8%** of all political disinformation analyzed in this research.

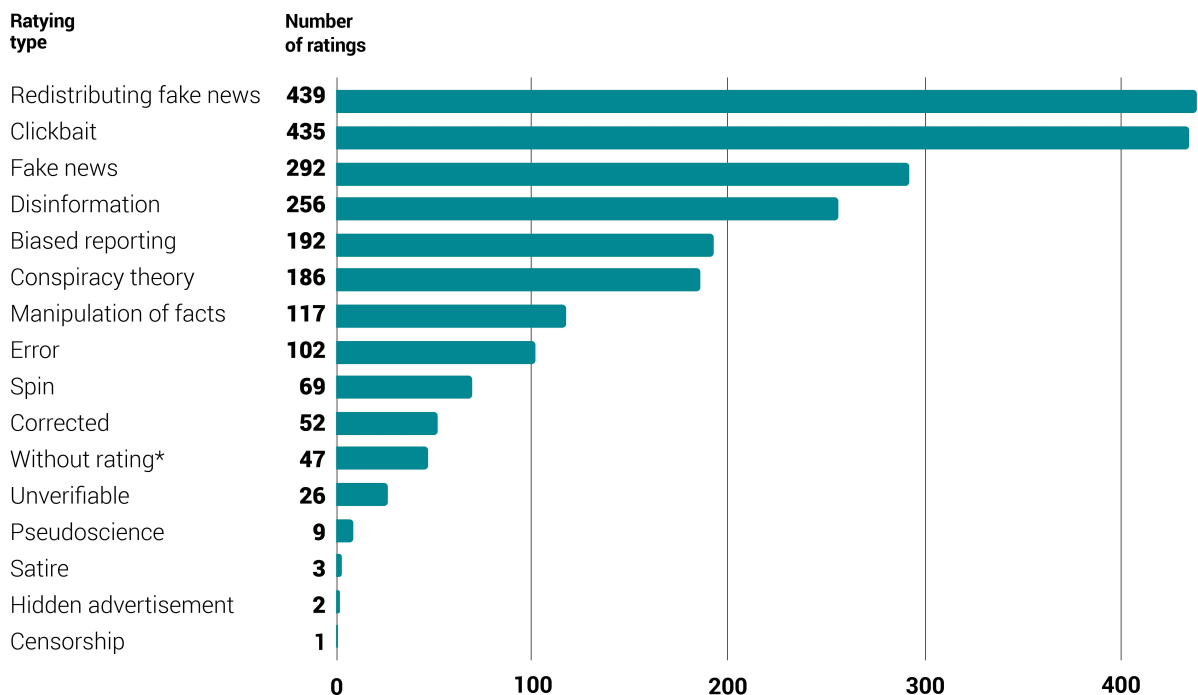


Figure 1: **Distribution of ratings in the sample (Total: 2,228)**

“Clickbait” appears as the second most frequent type of media manipulation, with a share of **19.52%** in total ratings. This suggests that profits and economic factors are significant reasons for creating misleading content about political topics.

Ratings “Disinformation”, “Biased reporting” and “Manipulation of facts” are also among the frequently used types of media manipulations, with a cumulative share of **25.36%** in total ratings. This suggests that media outlets often use more sophisticated types of misleading information and manipulate the truth with an intent to deceive the public.

“Censorship”, as defined by the methodology of Raskrinkavanje, has been represented in Raskrinkavanje’s database three times, or 0.04%. This does not suggest that cases of censorship are rare; it rather speaks to the fact that this type of manipulation is the hardest to prove beyond doubt.

The “**Corrected**” rating, appearing **52** times, is given to the articles where inaccurate information was corrected, usually after the publisher was contacted by *Raskrinkavanje*’s fact checkers. The rating “**Error**” which is defined as incorrect information published as a result of an unintentional mistake, has been recorded 102 times, or in **4.57%** of cases.

3.2. ANALYSIS OF THE MEDIA

3.2.1. TYPES OF MEDIA OUTLETS

For the purpose of this research, the media in the database were classified into seven categories based on their ownership structure and organizational type.

- **Public media:** Publicly owned media (majority ownership by the state, entity, canton or local self-governance) and their online outlets
- **Public news agency:** News agencies with majority public ownership
- **Private agency:** Privately owned news agencies
- **Commercial media:** Privately owned print or electronic media (TV stations, radio stations, newspapers, magazines) and their online outlets
- **Online media:** Media which exist only as online outlets (without press, TV, or radio outlets) and have clearly visible impressum and ownership information
- **Anonymous websites:** Online media outlets which do not provide any information about ownership or editorial staff
- **Social networks:** profiles and pages on social media, where they appear as sources of disinformation

To establish how these types of media participate in dissemination of political disinformation, the cumulative ratings for each media type were calculated by summing up the ratings given to each individual outlet in that media type.

Most of the media which publish political disinformation fall into the category of **anonymous websites**. Anonymous online portals have a larger cumulative share in the sample than all other types of media combined. The “flourishing” of anonymous websites which present themselves as news media has also been pointed out by many of the interviewed stakeholders as one of the main problems in the online media sphere, particularly because it’s the hardest one to tackle through regulation, and virtually impossible to tackle through self-regulation due to anonymity.

This type of “media” are therefore **primary contributors to spreading of political disinformation online**. However, a total of 12 publicly owned media and agencies, as well as commercial news agencies, also appear as sources or redistributors of political disinformation.

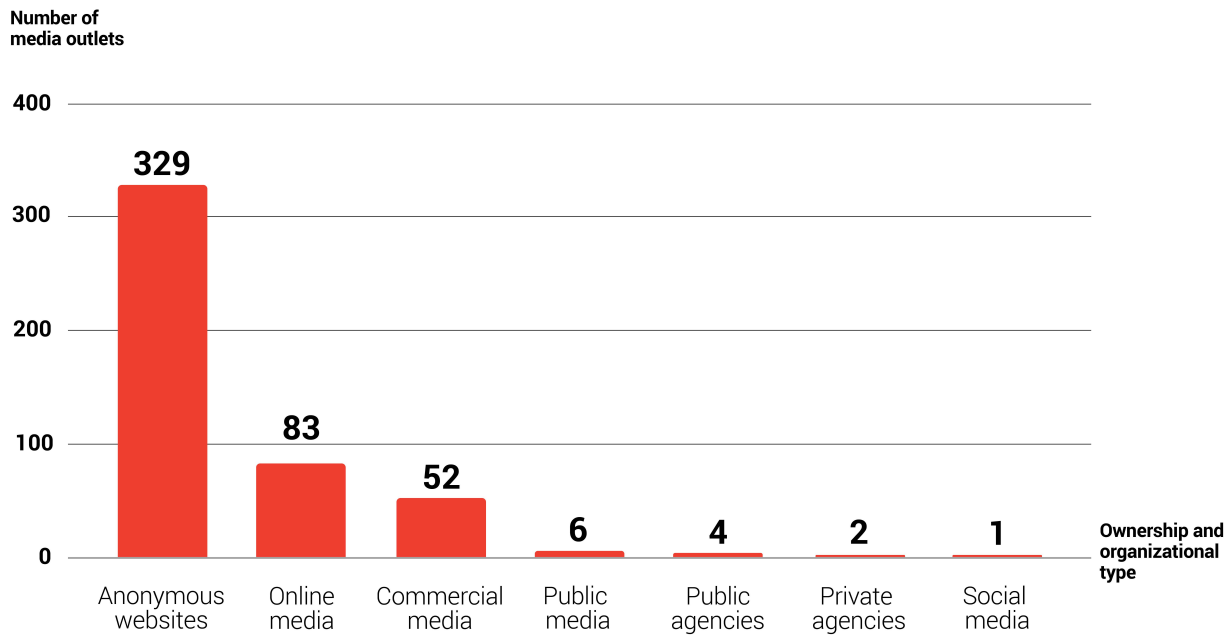


Figure 2: **Types of media outlets in the sample (Total: 477)**

Anonymous websites are prominently the most represented producers (more than 50% share) of media manipulations rated as “Fake news”, “Clickbait”, “Disinformation” and “Pseudoscience”. As expected, they are also most prone to use **clickbait**, which is both the most common type of manipulation appearing on these portals (**298 out of 1,144 given ratings**) and a type of manipulation which these media publish more than any other type of media (**68.51% – more than two thirds of all clickbaits** are found on anonymous portals). Anonymous portals are also by far the largest source of intentionally fabricated false information, both in the role of the source (**58.2%** of all published fake news) and the redistributor (**54.2%** of all fake news redistributed from other sources).

Ratings such as “Spin” and “Biased reporting” are also highly represented in this type of media source, indicating that some of these “media” may be working within specific partisan or ideological political narratives typically connected with these ratings. By contrast, this type of media source is among the least likely to issue a correction of inaccurate information after publishing it. Anonymous websites, while being most represented in ratings which indicate media manipulations, have published only **19%** of all corrections.

These data speak to the fact that: 1) “wild” portals, as they were described by some of the interviewees, make up for the largest amount of misleading content online; and 2) have little to no accountability to either their readers, or to the journalistic standards. A qualitative analysis of their content, combined with the quantitative data, points to two main conclusions: 1) their extensive use of clickbait indicates that profit is their main motive; and 2) economic gain is not the only motive which drives publishing of political disinformation in this type of media source.

Online media with clear ownership/identity attributions have published the most "Corrections" (42.31% of all published corrections). This type of media also has a significant share of the following ratings: "Manipulation of facts" (25.64%), "Biased reporting" (20.83%) and "Error" (28.43%). The large number of **errors** in their work speaks to the fact that online media market demands intensive content production, while most online media fail to provide good quality assurance procedures and editorial practices. In the process of publishing content, there is lack of fact-checking and information verification, often resulting in unintentional errors.

The difference between anonymous and non-anonymous online portals is most striking in the use of "Clickbait", which is far less present in the genuine online media websites than in their anonymous counterparts (17.7% compared to 68.5% of share in total number of "Clickbait" ratings). However, this type of media also appears as the second highest source of entirely false information, amounting to 15.75% of all "Fake news" and 19.36% of all "Redistributing fake news" ratings.

Commercial media has a 20.83% share of "Biased reporting", 24.22% of "Disinformation" rating, and the second largest share of "Corrections" (32.69%). These findings imply that commercial media outlets are more inclined to use misleading interpretations than outright false information, maintaining certain level of correct factual reporting, while still exercising editorial bias.

News agencies mostly publish "Spin", "Conspiracy theories", "Unverifiable information" and "Fake news". These ratings are strongly influenced by one news agency (*Srna*), which appears as the most prolific publisher of misinformation - especially those with underlying political motives - in this type of media.

Private news agencies have published 4.35% of all "Spin" and 3.85% of all "Unverified information". They have a share of 2.15% in "Conspiracy theories", and 1.56% of "Biased reporting" and "Disinformation rating".

Public news agencies published a total of 57 media manipulations. They have the highest share of "Unverifiable information" (7.69%) and "Conspiracy theories" (6.45%). A share of 3.42% of all "Manipulation of facts", 4.69% of all "Biased reporting" and 2.9% of "Spin" has also been recorded in public news agencies. A significant finding is that **public news agencies have been the source of fake news in 4.11% of the cases**, while they redistributed 1.59% of fake news from other media outlets.

Public media published 26.1% of all "Spin", 19.23% of "Unverifiable information" and 18.23% of "Biased reporting" – a result which indicates strong political motives behind the disinformation appearing in this type of media.

3.2.1.1. REACH ON SOCIAL MEDIA

Different types of media have different approaches to their audiences. Manipulative use of social media to gain visibility and reach large numbers of people is a "signature strategy" of anonymous websites. Since Facebook is still the dominant social media platform in BiH and the region, the entire business model of anonymous portals is built around this social network. This is a phenomenon which is described on *Raskrinkavanje* as "farms" of anonymous portals.³⁵

MODE OF OPERATION OF ANONYMOUS "MEDIA"

Most of the anonymous websites which appear in this sample are manifestations of a phenomenon known as "portal farms". These are networks of websites and Facebook groups managed by the same person or persons, which link to each other and use multiple outlets to amplify the reach of the content they publish. Although they look like news media outlets, they don't have newsrooms, editors or journalists: they are run by a single individual or a small group of people who stay anonymous, using all available services to conceal their identity in "who is" data registries.

The economic benefit of the owner is the only driving force behind these outlets, which is why they are heavily populated with ads, usually from Google AdSense platform. Most are connected with several Facebook pages or groups, which are usually not visibly related to the website. To Facebook users, these pages appear as "general interest" pages, as a way to trick the visitors into following them.

Many people who are targeted by such "media" are themselves not aware of their inner mechanisms which are based on producing misleading and/or "lowest common denominator" content (clickbait headlines, false and/or sensationalist "reporting") and networks of Facebook pages to promote their content. The network of linked portals and Facebook pages make one such "portal farm".

The most successful ones, who "master" the use of these manipulation tactics, manage to achieve enormous reach on social media, while remaining fully anonymous, operating outside of the mainstream media cycle or the attention of the general public. These "farms" are a driving force for the expansion of "disinformation landscape".

An example of such "farm" is the one developed around Facebook fan page *Sarajevo Grad* and three related Facebook pages, with a total reach of **466,000 fans** on this social network.³⁶

³⁵ Zulejhić, Emir. „Farme portala: Biznis u kom vaše vrijeme postaje tuđi novac“. *Raskrinkavanje*. November 17, 2018. <https://bit.ly/2WILFjf>

³⁶ *Sarajevo Grad*. 271,912 fans <http://bit.ly/2H87y0P>;
Vijesti iz regije. 54,372 fans <http://bit.ly/2GOfJjw>;
Bosna i Hercegovina. 69,740 fans <http://bit.ly/2SvqYFN>;
Sarajevo Grad II. 76,569 fans <http://bit.ly/2Nvuulr>;

The case of BiH

Since 2011, these pages have regularly shared content from 25 different interconnected portals, majority of which were shut down in the meantime. These websites are usually taken down because they regularly violate Google AdSense rules to artificially increase page views, manipulate search engines, or “force” ads on viewers. After Google “notices” the violations and bans its AdSense service, the website is no longer useful for the owner, who shuts it down and creates a new one to be promoted through the same channels.

Some of these farms have an even larger reach, far surpassing that of even the most successful “regular” media. One such example is a semi-anonymous portal “Novi”,³⁷ which uses a total of **58 Facebook pages** to promote the content published on its main portal (novi.ba) and several related domains, reaching the astonishing **6,670,421 followers** on Facebook.³⁸

The two anonymous websites which are the most frequent publishers of political disinformation in the sample, are the above mentioned *Sarajevo Grad* and *Poskok* (the latter does not belong to a “portal farm” and has a significantly lower reach on social networks).

Of all the media types represented in the sample, **anonymous websites** have the highest reach on social media. **Online media** (as defined in this report³⁹) are the second most successful in reaching their audiences on Facebook. The exceptions are *RTS* (public broadcaster in Serbia) and *Sputnik* (Serbian outlet of a Russian news agency), both with a significant social media following.

Accessed on January 24, 2019.

³⁷ The portal has changed ownership and editorial information several times, reducing it to basic information (publisher, director of the company), while names of the editorial staff have been removed in the process. Most of the texts are published anonymously and the portal does not disclose any of the social media pages it uses for promotion of its content, except for the “official” one of the same name. Although this portal has received over 80 ratings on *Raskrinkavanje*, it does not appear in this sample as it is predominantly oriented towards showbiz, gossip and similar type of content, rather than political disinformation. Media profile available at: <http://bit.ly/2Vq1NzE>

³⁸ Data compiled through “**CrowdTangle**” tool and Facebook search. <http://bit.ly/2IPTBHc>

³⁹ The media which don't have any other outlets except for the website.

Number of Facebook followers for "top two" publishers of disinformation for each type of media in the sample:⁴⁰

ANONYMOUS WEBSITES:

- Sarajevo grad: 271,772⁴¹ + 76,575⁴² + 69,743⁴³ + 54,372⁴⁴ (Total: 466,000)
- Poskok: 28,654⁴⁵

PUBLIC MEDIA:

- RTRS: 46,734⁴⁶
- RTS: 351,713⁴⁷

COMMERCIAL MEDIA OUTLETS:

- Alternativna televizija: 58,944⁴⁸
- Informer: 98,506⁴⁹

ONLINE MEDIA:

- Srbija danas: 306,567⁵⁰ + 228,667⁵¹ (total: 564,000)
- Fresh press: 107,918⁵²

NEWS AGENCIES:

- Sputnik Srbija: 112,430⁵³
- Patria: 19,047⁵⁴
- Srna: 1,762⁵⁵
- Tanjug: 15,731⁵⁶

⁴⁰ All Facebook pages accessed on January 22, 2019.

⁴¹ Sarajevo Grad. <http://bit.ly/2UIA3Mm>

⁴² Sarajevo Grad. <http://bit.ly/2IQ60Lq>

⁴³ Sarajevo Grad. <http://bit.ly/2EM8lxF>

⁴⁴ Sarajevo Grad. <http://bit.ly/2UjLqV6>

⁴⁵ Poskok. <http://bit.ly/2TtM19v>

⁴⁶ RTRS. <http://bit.ly/2NIYDnV>

⁴⁷ RTS. <http://bit.ly/2XFr0Yz>

⁴⁸ Alternativna televizija. <http://bit.ly/2TeUa28>

⁴⁹ Informer. <http://bit.ly/2XFovp6>

⁵⁰ Srbija danas. <http://bit.ly/2ENpXhR>

⁵¹ Srbija danas. <http://bit.ly/2XFFbgb>

⁵² Fresh press. <http://bit.ly/2E0ta0J>

⁵³ Sputnik Srbija. <http://bit.ly/2C2FSHy>

⁵⁴ Patria. <http://bit.ly/2H0VOy4>

⁵⁵ Srna. <http://bit.ly/2ED1quv>

⁵⁶ Tanjug. <http://bit.ly/2TfoGsN>

3.2.2. MEDIA OUTLETS BY LOCATION

Most of the media which appear in the sample (more than a half) are based in Bosnia and Herzegovina. However, the number of media with unidentifiable location is also high. These are the anonymous media which target regional audiences and are impossible to connect to any specific location.⁵⁷ Finally, there are 100 media in the sample located in the neighboring countries, mostly in Serbia.

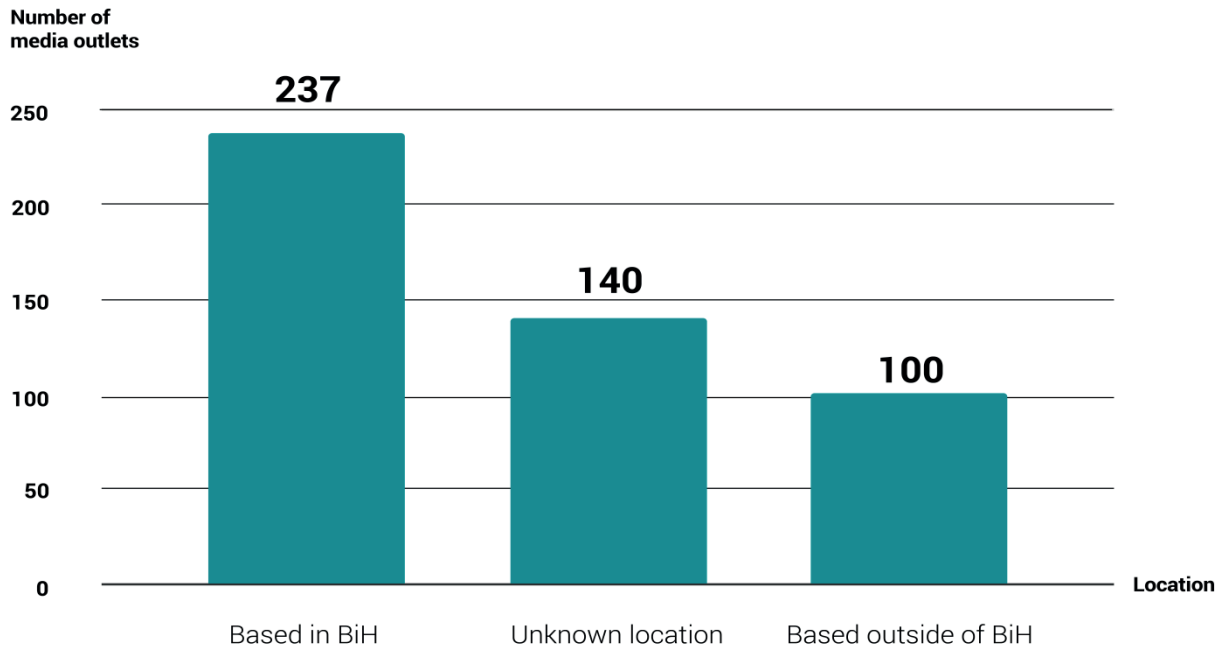


Figure 3: **Location of media outlets in the sample (Total: 477)**

⁵⁷ Annex 1: Methodology.

3.2.3. INDIVIDUAL MEDIA OUTLETS

As stated before, **2,228** ratings in *Raskrinkavanje* database pertain to the content labeled as "Political disinformation" and **477** different media outlets were rated for publishing such content in the course of one year, averaging on **4.67 media manipulations** per individual media outlet in the sample.

While anonymous websites dominate the sample, both in terms of their number and the number of ratings they received, the individual media outlet which has received the highest number of ratings is **RTRS, a public broadcaster** of Republika Srpska, followed by two other RS-based media: **Srna, a public news agency** and **Alternativna televizija, a commercial media outlet**. The image below shows the ten individual media outlets which have published the most political disinformation in the past year. Only two (*Sarajevo grad* and *Infosrpska*) belong to the category of anonymous websites.

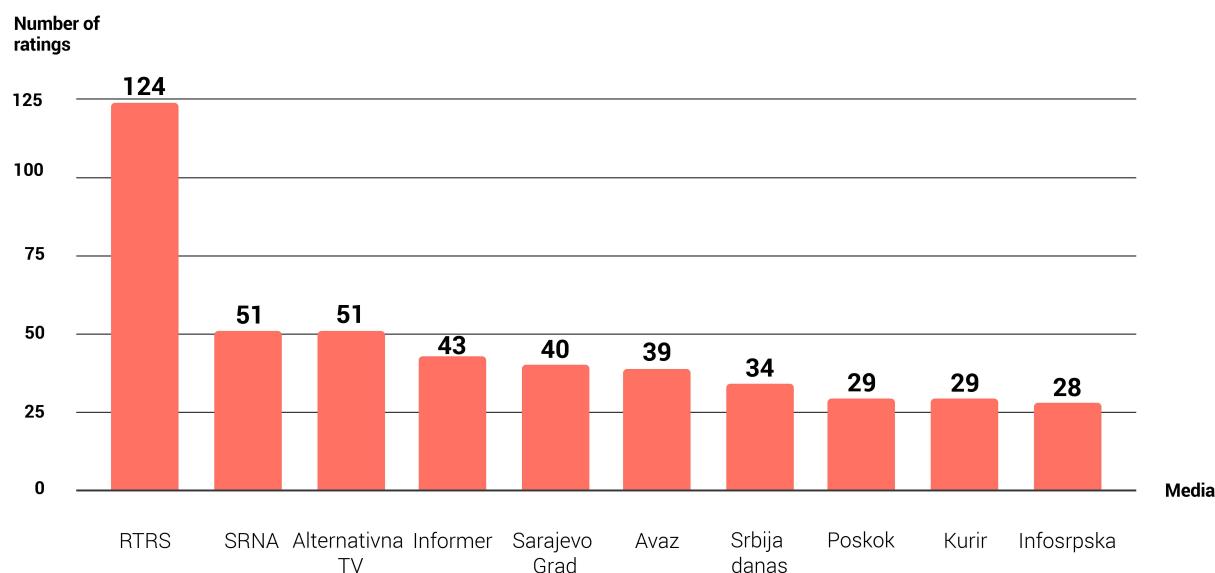


Figure 4: **Ten most frequent publishers of political disinformation (Total ratings: 1,461)**

Out of these ten, seven are located in BiH and three media are located in Serbia. In total, **1,461 ratings (65.57% of all media manipulations)** were given to media outlets based in Bosnia and Herzegovina, according to the criteria used to determine media location. Media outlets based in BiH published minimum one political disinformation per month during the time covered by this report. More than a half of them published minimum two disinformation per month.

Key finding is that **8.81% of all the political disinformation published by BiH-based media comes from one public broadcaster, Radio televizija Republike Srpske (RTRS)**.

The case of BiH

These are the BiH media which appear as main publishers of political disinformation:

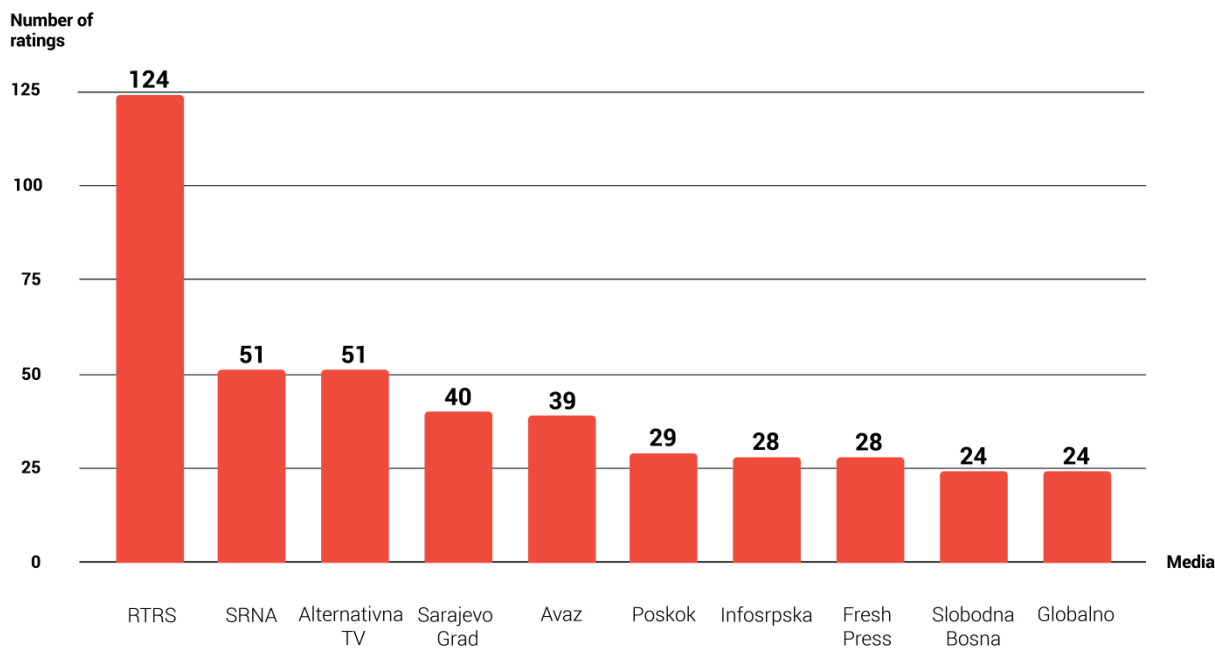


Figure 5: **Ten most frequent publishers of political disinformation in BiH (ratings)**
(Total ratings: 1,461)

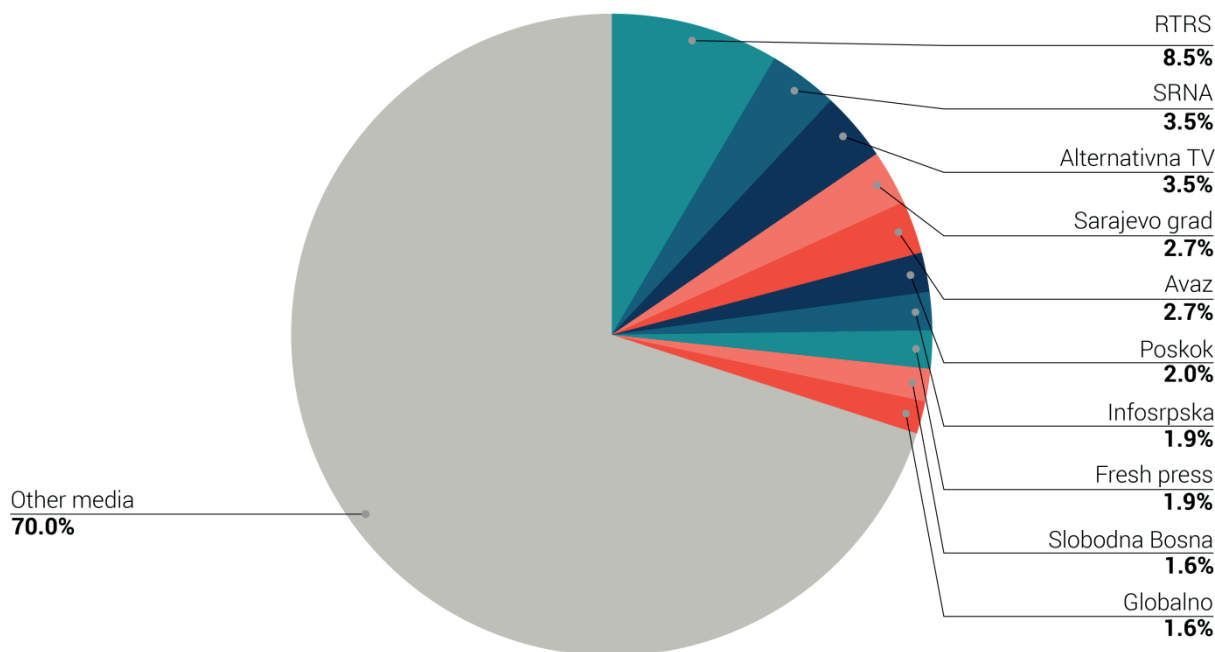


Figure 6: **Ten most frequent publishers of political disinformation in BiH (percentage)**
(Total ratings: 1,461)

A total of **523 ratings (23.47% of all ratings)** were given to media outlets based outside of Bosnia and Herzegovina. All the media in the “top ten” list of most frequent publishers of political disinformation are based in Serbia: if the “top twenty” media are selected, there are only two media outlets which are not located in that country (Dnevno.hr at the 14th place and Max portal at the 20th, both from Croatia).

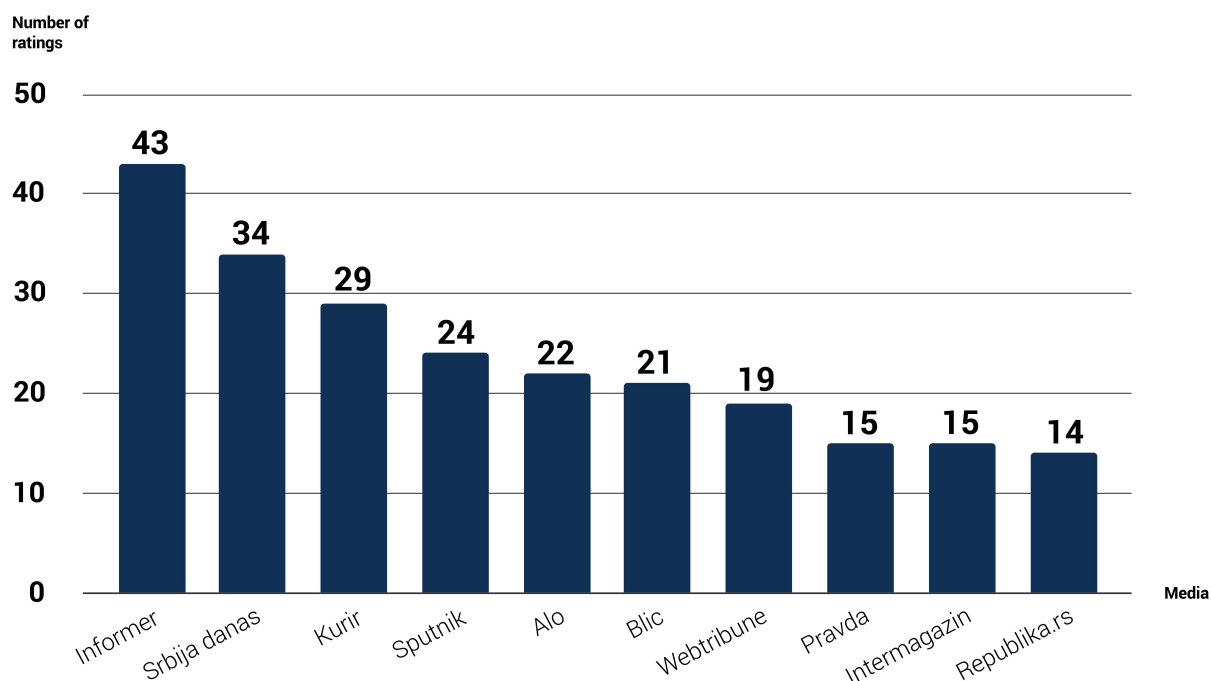


Figure 7: **Number of ratings per individual media outlet (outside of BiH)**
(Total ratings: 523)

Remaining **224** or **10.95%** of disinformation were published by websites with unidentifiable location. In this category, the 20 portals which had received the most ratings⁵⁸ account for just a little over 4% of all published political disinformation.

The data presented above are calculated based on the **number of ratings** that each of these outlets has received in the past year. The number of ratings is equal to the number of specific media manipulations published in that media outlet.

⁵⁸ These are: *Vijesti 24h*, *Vijesti 24.net*, *Skandalozno*, *Dnevne vijesti*, *IBalkan*, *Balkanis*, *Islam-live*, *Balkanija*, *Balkan vesti*, *Wikisi.wordpress*, *Relevantno*, *Prati svoje snove*, *Najljepsi Citati*, *Klix.online*, *Instant 24*, *Euskola*, *Dnevne-Vijesti.gq*, *Balkan.website*, *24hZanimljivosti*, and several Facebook pages and profiles.

The case of BiH

There is one more way to look into individual media outlets and their participation in the overall scope of political disinformation published in that time, and that is the **number of articles** which were rated by *Raskrinkavanje*. An article can receive more than one rating if more than one type of media manipulation appears in it. The number of ratings is therefore higher than the number of articles. For an article to appear in the database, it has to receive **at least one rating**, meaning that it contains at least one type of media manipulation.

These are all the media which have published 10 or more such articles, regardless of their location or media type:

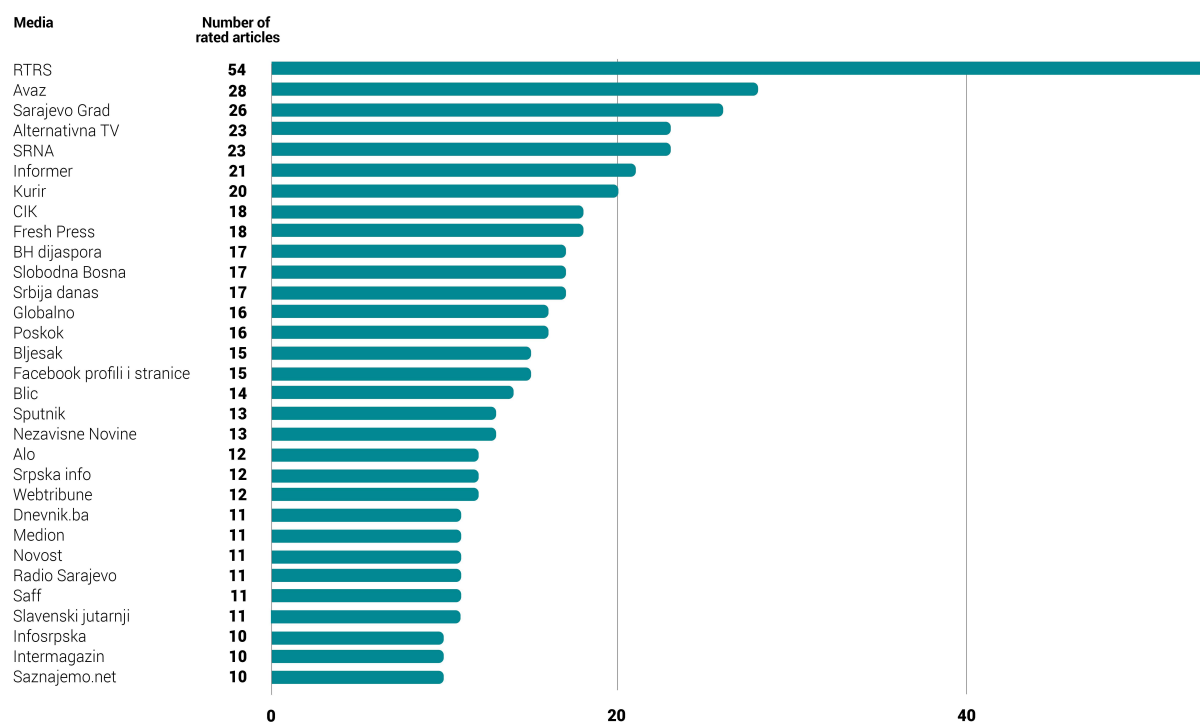


Figure 8: **Media with 10 or more articles rated for political disinformation**

When all the data presented above is compared, these are the key findings about **publishers of political disinformation in BiH (and the region)**:

- Anonymous websites, which are mostly not professional media outlets, are the type of publisher which is the most present in the sample and contributes the most to creation and dissemination of disinformation online. However, these websites are individually not the most frequent publishers of political disinformation. These are the two publicly owned media outlets, *RTRS* and *Srna*, which is a fact that raises particular concern.⁵⁹

⁵⁹ There is no standardized practice or a rule that obliges Communications Regulatory Agency to subject public media to more scrutiny and to monitor their programs more regularly. However, in the recent years CRA did provide monitoring of the program of some public broadcasters. After monitoring of RTRS informative programs in the one-month period in mid-2017, in February 2018 CRA fined *RTRS* for violation of Article 5 (Fairness and Impartiality) of the Code on Audiovisual Media

- Most of the media in the sample are located in Bosnia and Herzegovina, while most of the media located outside of BiH are based in Serbia, with tabloids and online portals playing the most prominent role in spreading disinformation. The only exception is the state-owned news agency *Sputnik*, which is based in Serbia, but is owned by the government of Russia.

3.3. SOURCES AND REDISTRIBUTORS OF POLITICAL DISINFORMATION

The data presented above takes into account all ratings given to all the 477 media outlets in the sample. In many cases, these media have published the same disinformation, with one media outlet acting as a **source** (the media which created the disinformation) and others acting as **redistributors** (copying and republishing the original article where disinformation was first published).⁶⁰

Out of 2,228 total ratings in this sample, **530** are given to the **sources** and **1,668** ratings are given to the **redistributors** of disinformation. Remaining **30** ratings relate to cases where the disinformation was originally published in a foreign language; these ratings are given to the media which have been the first to translate and publish it in local language.⁶¹

Services and Radio Media Services, pointing out that the monitoring showed favoritism towards SNSD, specifically: *“continuous and tendentious promotion of interests of the ruling party, favoring individuals or subjects in positive context, and continually present critical tone towards the opposition.”* CRA. “The overview of CRA decision for February 2018.” <http://bit.ly/2TgtA8i>.

⁶⁰ For details on identification of sources and redistributors, see: *Methodology of Raskrinavanje* in *Annex 1: Methodology*

⁶¹ See: *Designation separating sources and redistributors of disinformation in Methodology*

3.3.1. SOURCES

Looking at the types and locations of media outlets, anonymous websites from BiH appear, again, as the most frequent sources of political disinformation.

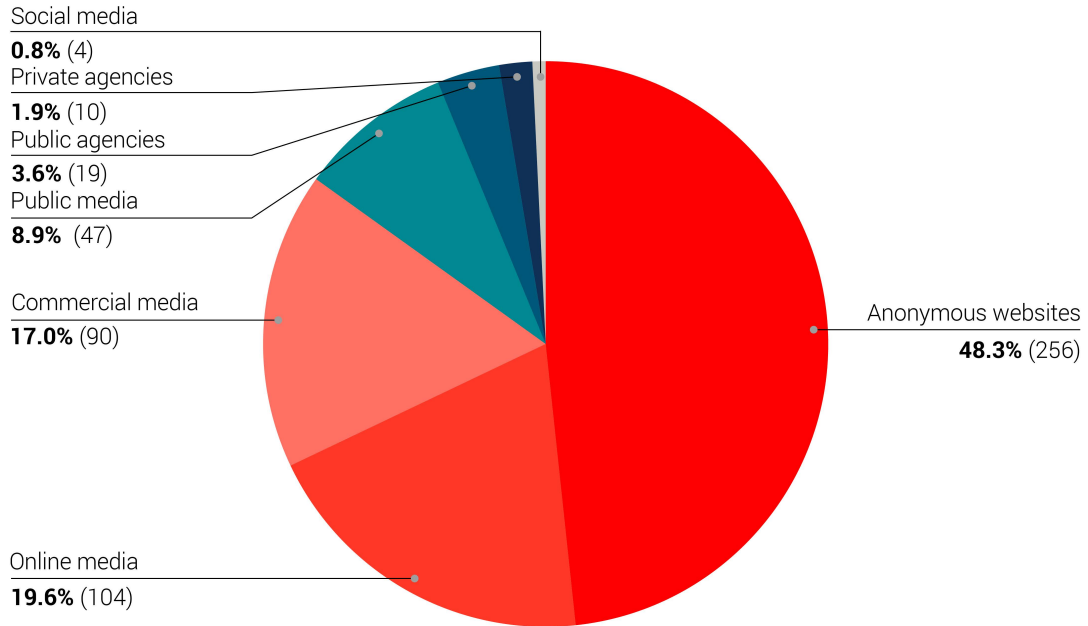


Figure 9: Sources of disinformation by media type
(Total ratings: 530)

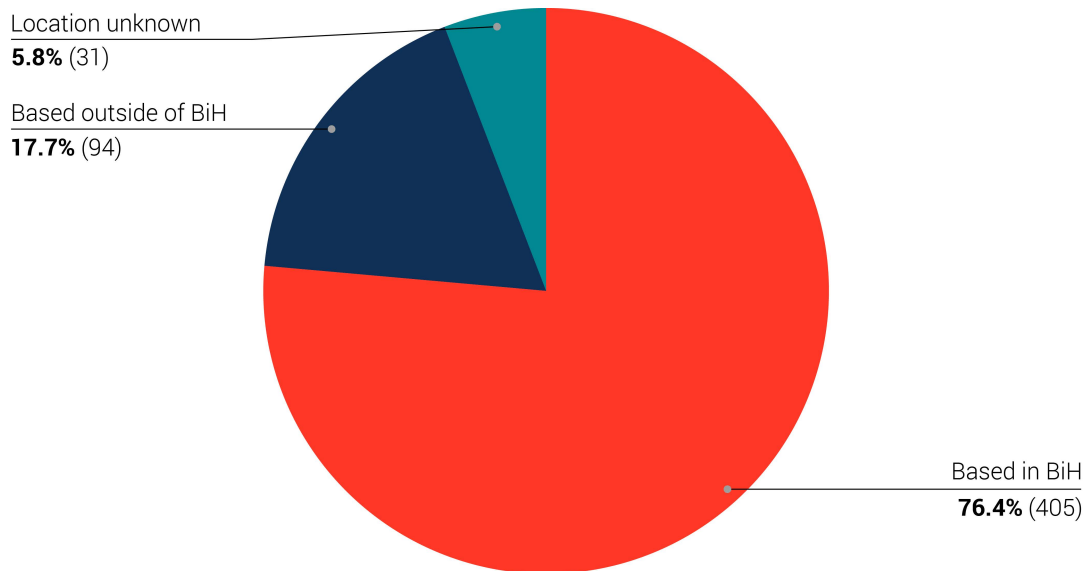


Figure 10: Sources of disinformation by media location
(Total ratings: 530)

When it comes to individual media outlets, anonymous portals remain significant sources of political disinformation, with **four anonymous websites**⁶² among the ten most frequent sources. Again, the only media outside of BiH which appear in this list are based in Serbia (*Srbija danas* and *Informer*).

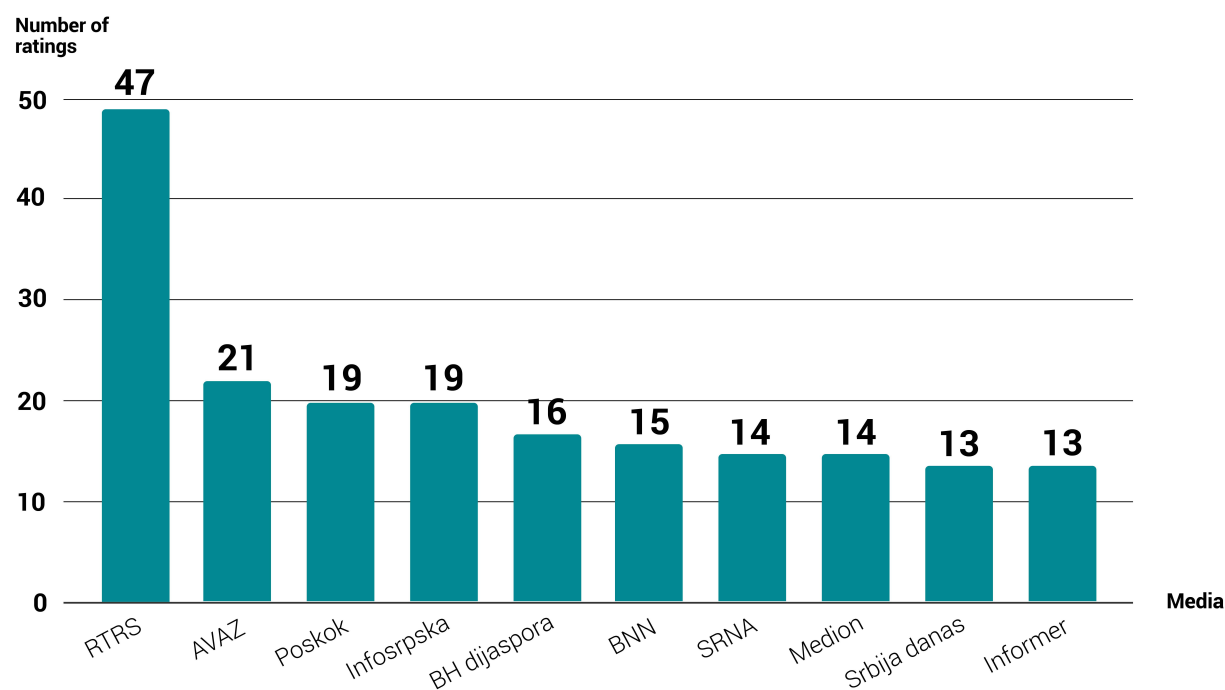


Figure 11: **Ten most frequent sources of political disinformation in the sample (ratings)**
(Total: 530)

These ten media outlets have been the creators of **191 out of total 530 political disinformation** published in the past year. All the other ratings present in the sample are the products of these 530 disinformation which were copied, republished and redistributed by other media. In other words, out of 477 media outlets, **only 10 individual media are responsible for more than a third, or 36.02% of all media manipulations tracked in a year's time.**

⁶² Poskok, Infosrpska, BH Dijaspota and Medion.

The case of BiH

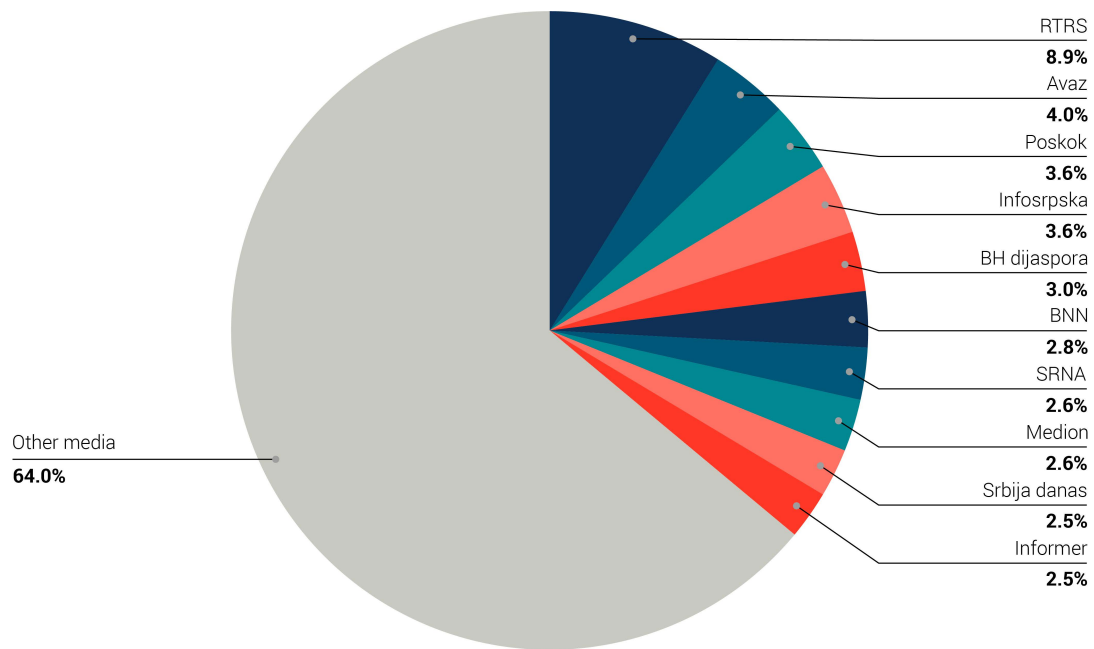


Figure 12: **Ten most frequent sources of political disinformation in the sample (percentage)**
(Total ratings: 530)

3.3.2. REDISTRIBUTORS

As noted above, the total number of ratings in the sample is the result of multiplication of the original 530 pieces of media manipulations. When it comes to media types and location, the top redistributors of disinformation are similar as the sources: these are mostly anonymous media located in BiH.

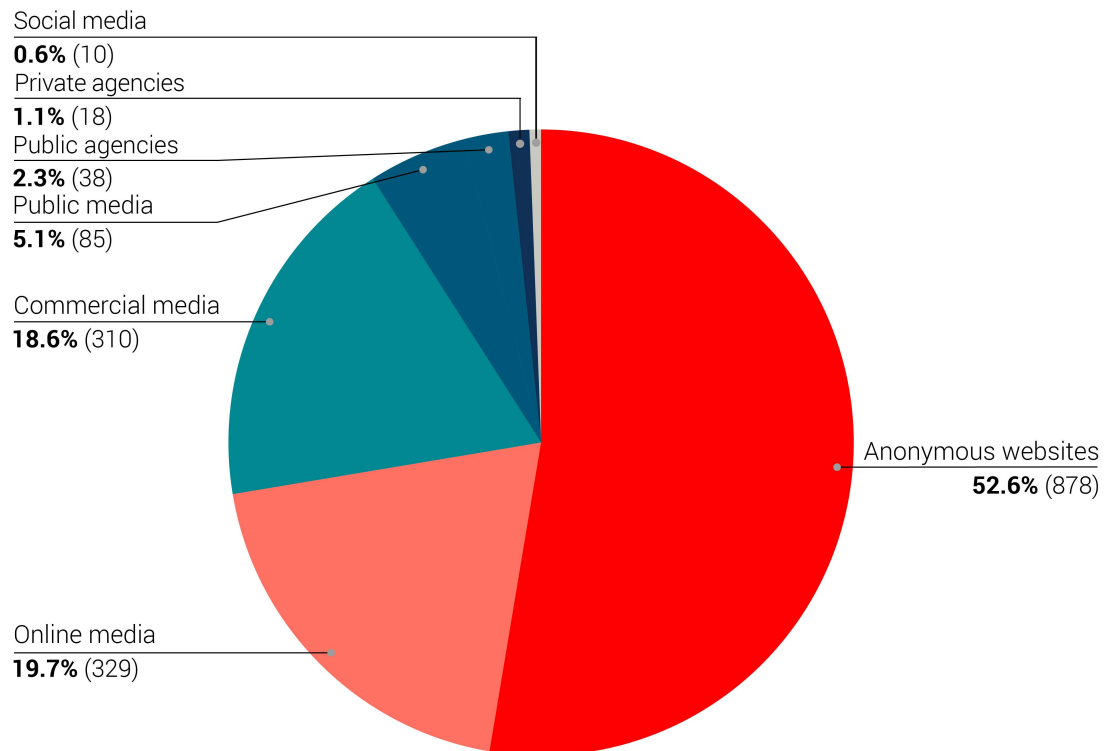


Figure 13: **Redistributors of disinformation by media type**
(Total ratings: 1,668)

The case of BiH

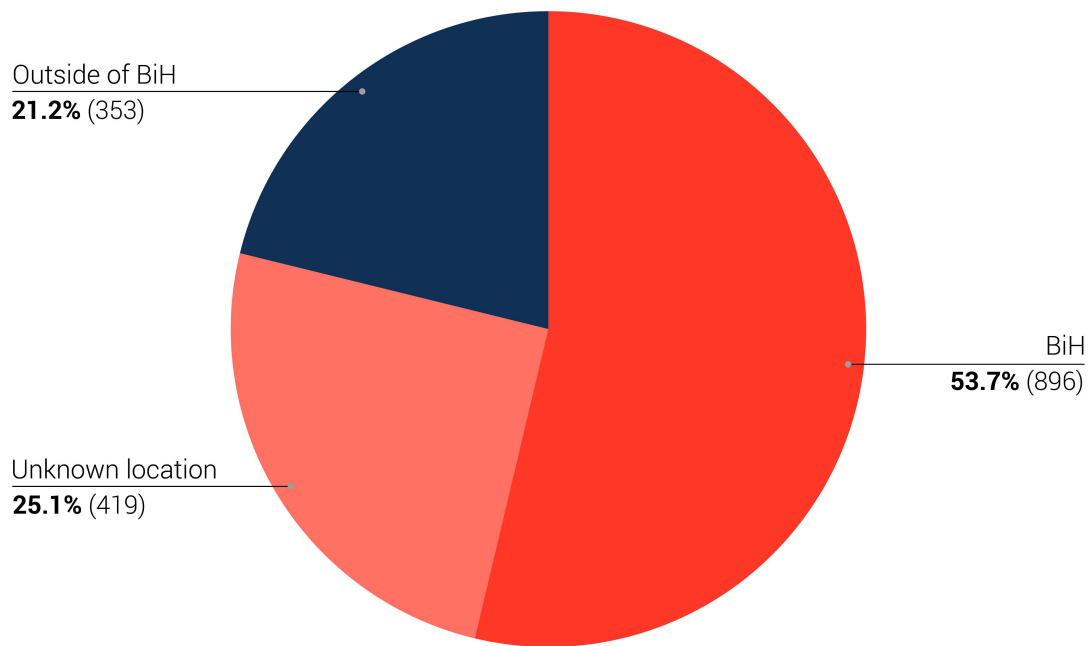


Figure 14: **Sources of disinformation by media location**
(Total ratings: 530)

The individual media outlets which appear as the most frequent **redistributors** of political disinformation are similar to those which appear as sources. However, among the “top ten” redistributors of political disinformation there are fewer anonymous outlets and more outlets based outside of BiH compared to the “top ten” sources.

This points to conclusion that “legitimate” media outlets tend to use anonymous websites as sources of disinformation, despite their evident lack of credibility as sources of information.

Disinformation in the online sphere

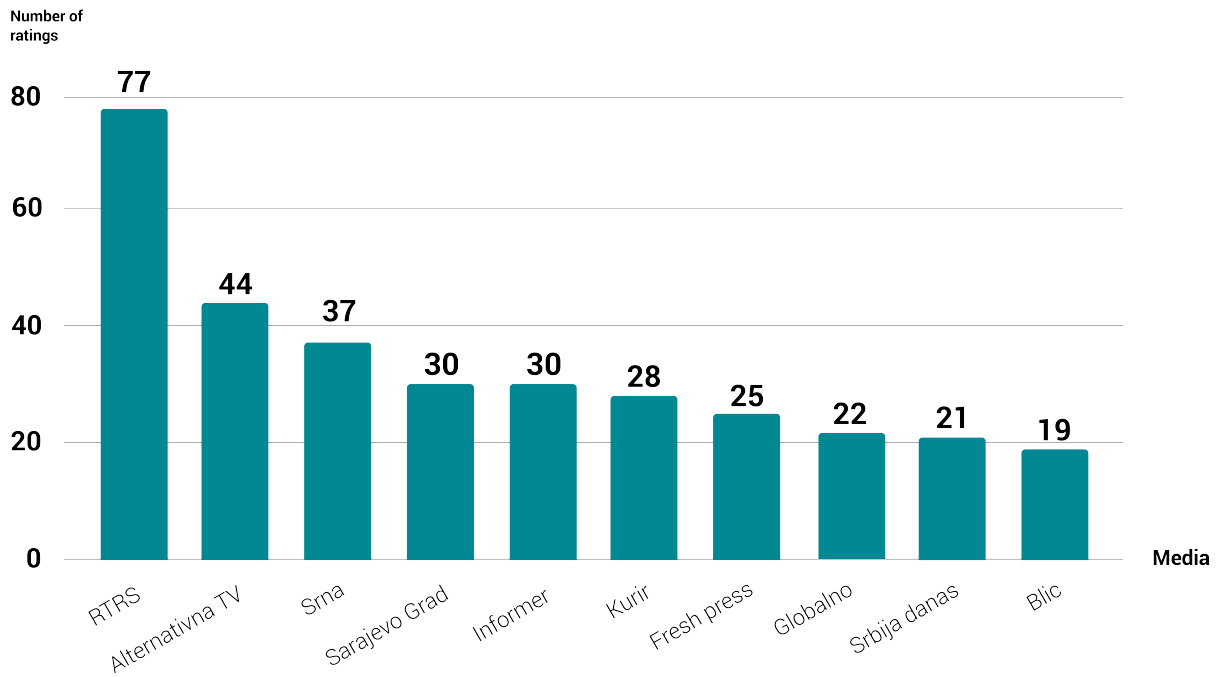


Figure 15: **Ten most frequent redistributors of political disinformation in the sample (ratings)**

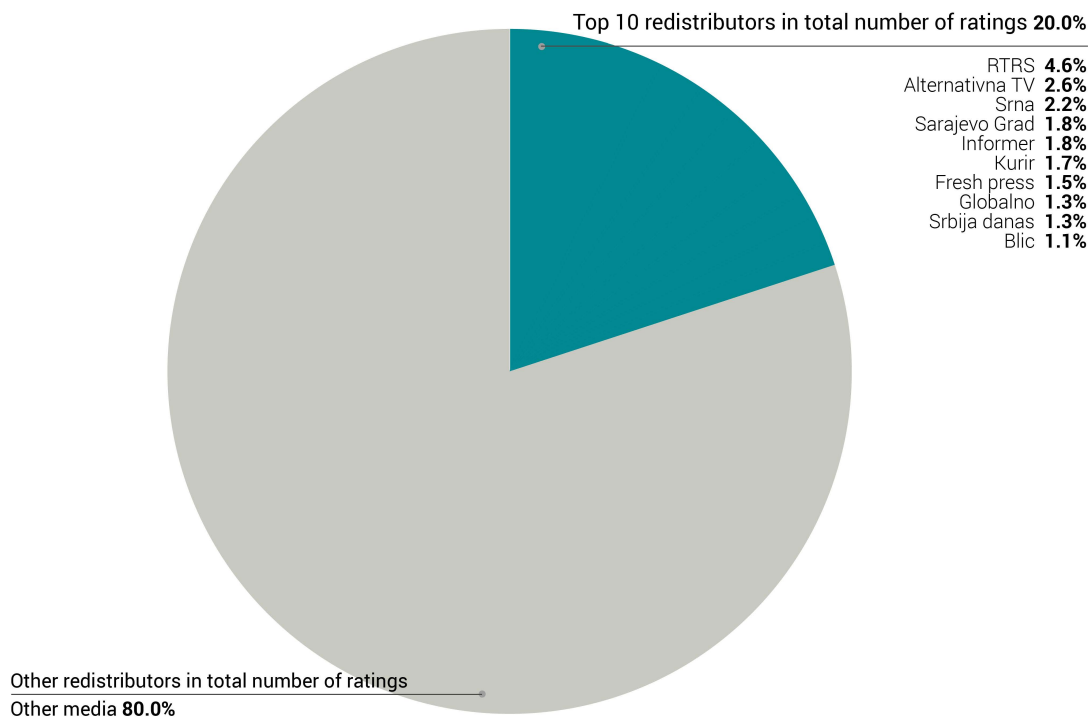


Figure 16: **Ten most frequent redistributors of political disinformation in the sample (percentage)**

Six media outlets appear on both the list of the top sources and the top redistributors. These are the media which can be considered as “top ranks” in overall creation and redistribution of political disinformation in BiH and the region.

Media	Number of source ratings	Share in total source ratings (530)	Number of redistribution ratings	Share in total redistribution ratings (1668)
RTRS	47	8.87%	77	4.62%
Avaz	21	3.96%	18	1.08%
Srna	14	2.64%	37	2.22%
Srbija danas	13	2.45%	21	1.26%
Informer	13	2.45%	30	1.80%
Sarajevo Grad	10	1.89%	30	1.80%

Table 1: **Intersection of top sources and top redistributors in the sample**

3.4. TARGETS AND BENEFICIARIES OF POLITICAL DISINFORMATION

The data presented above provides insight into the scope and structure of distribution of political disinformation in BiH and regional media. The content of the sample was analyzed to identify which actors appear as subjects/objects of disinformation and in which roles. The **actors targeted with disinformation** are those persons or entities presented in a negative light, in a misleading or manipulative way; the **beneficiaries of disinformation** are those who are portrayed in a positive light in those same media manipulations.⁶³ The actors which appear in the analyzed material, but are not consequential for the “story” told with the use of disinformation, are marked as actors portrayed in a neutral way (actors who are not subjects of disinformation).

A total of **444** actors were identified in the database,⁶⁴ majority of which fall into the category of targeted actors (portrayed in a negative light). Public figures which are portrayed in a predominantly positive light include many pundits used by the media outlets as sources or commentators (i.e. “verifiers”) of disinformation. Majority of the actors which are targeted with media manipulations include institutions, politicians or political parties, amounting to 54.11% of all actors; citizens and private persons make up for 17.52% of total actors in the sample. It is interesting to mention that military or police entities are subjects of almost 5% of all the media manipulations.

⁶³ See: **Annex 1: Methodology.**

⁶⁴ Total number of individual actors can be slightly smaller due to use of different spelling in different media, as the actors' names were copied into the database as written. This, however, doesn't have a significant effect on the results of data analysis.

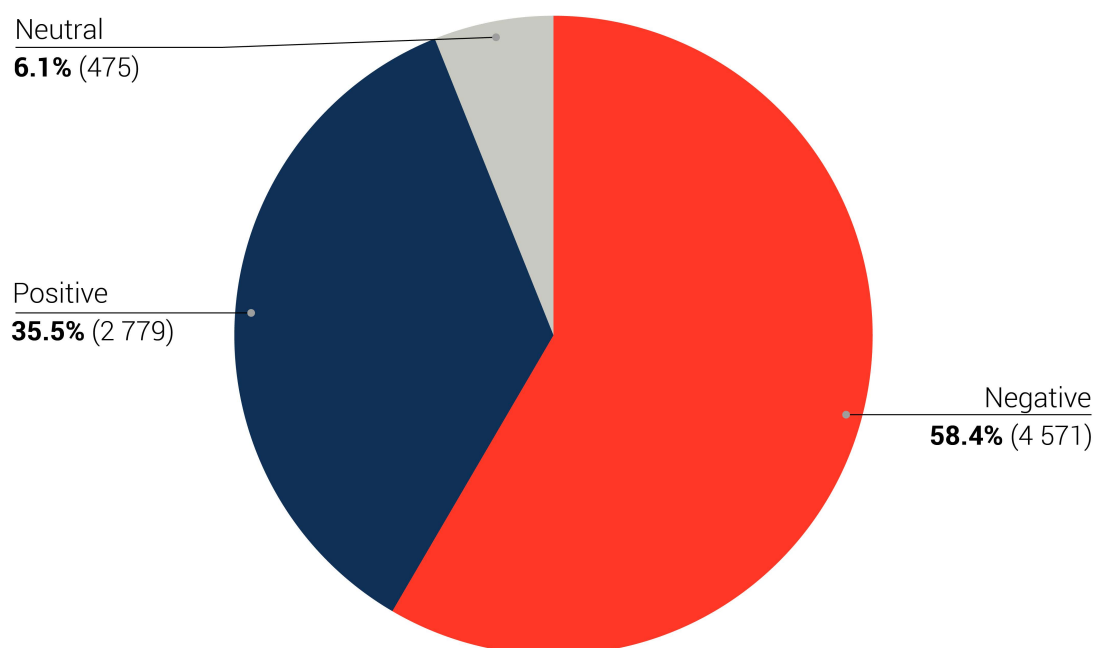


Figure 17: **Representation of actors in the sample**
(Total: 7,826)

Most of the media manipulations feature BiH-based actors, which make up for 62.1% of all actors mentioned in the articles. The actors from the Western countries are mentioned in 17.45% of cases; actors from Russia, Turkey and other countries also appear in the sample in smaller percentages.

The single most frequently mentioned actor in the whole sample is Milorad Dodik, who is portrayed more in a positive than in a negative light (out of 377 mentions, 202 are positive). He is followed by Bakir Izetbegović, who is dominantly portrayed in negative light (165 negative out of total 195 mentions). Other local actors with a lot of mentions who are predominantly negatively portrayed in the sample are Dragan Mektić, Davor Dragičević (the same is the case with "Justice for David" protests when they are mentioned separately) Fadil Novalić, Željko Komšić and Šefik Džaferović. Actors like Dževad Galijašević (who frequently appears as a pundit in the analyzed articles), Dragan Čović and Dragan Lukač are more often portrayed in a positive than in a negative light.

The case of BiH

Name	Positive mentions	Neutral mentions	Negative mentions	Total
Milorad Dodik	202	38	137	377
Bakir Izetbegović	19	6	165	190
Dragan Mektić	22	14	65	101
Davor Dragičević	8	0	81	89
Dževad Galijašević	84	0	0	84
Fadil Novalić	0	0	63	63
Dragan Čović	35	2	25	62
Željko Komšić	10	2	46	58
Šefik Džaferović	19	2	32	53
Dragan Lukač	47	0	4	51

Table 2: **Actors from BiH most frequently mentioned in the sample**

When it comes to local political parties, there is a clear line between those which are portrayed positively and negatively. The parties which include SNSD, its coalition partners and political allies, appear mostly in a positive context, while the opposition parties/coalitions from Republika Srpska and parties from the Federation of BiH which are not favorably oriented towards Dodik/SNSD are overwhelmingly portrayed in negative light. The party which stands out by the number of mentions is SDA (with 126 negative out of total of 152 mentions). It's also interesting that all the parties perceived as non-nationally oriented parties (SDP, Naša stranka, GS, DF) are exclusively portrayed in negative light.

Name	Positive mentions	Neutral mentions	Negative mentions	Total
SDA	20	6	126	152
SNSD	32	0	11	43
Savez za pobjedu (Savez za promjene)	0	0	41	41
SDP	0	0	26	26
Naša stranka	0	0	24	24
Koalicija SNSD, DNS, SP	10	11	0	21
HDZ BiH	17	0	0	17
SBB	8	0	5	13
Građanski Savez	0	0	11	11
Demokratska fronta	0	0	8	8

Table 3: **Political parties from BiH: Mentions in the sample**

Bosnia and Herzegovina as a country is mentioned 103 times, out of which 69 in negative light; the Federation of BiH is mentioned 175 times, almost exclusively in negative light (only 5 positive mentions), while Republika Srpska appears 185 times, out of which 130 in positive and 55 in negative light.

Other countries which are most frequently mentioned in the sample are the USA (mostly negatively) and Serbia (mostly positively). Russia, Palestine and Germany are dominantly portrayed as positive, while Israel and Great Britain are mostly mentioned in a negative light.

Name	Positive mentions	Neutral mentions	Negative mentions	Total
USA	44	5	75	124
Serbia	60	6	24	90
Russia	60	2	15	77
Israel	0	0	54	54
Palestine	54	0	0	54
Great Britain	10	0	50	60
Argentina	49	0	0	49
Germany	41	0	1	42
Croatia	25	0	10	35
Turkey	13	0	10	23

Table 4: **Countries most frequently mentioned in the sample**

The civil society organizations, both from BiH and from abroad, are almost exclusively mentioned in negative light. International bodies and organizations are also mostly negatively portrayed (particularly NATO, which has 35 negative and no positive mentions).

When it comes to political actors outside of BiH, it's noticeable that, although many of the media in the sample are located in Serbia and some in Croatia, the actors from these two countries do not feature prominently in the content of political disinformation. The only political actor from the region with a significant number of mentions is Aleksandar Vučić, who is mostly portrayed in positive light (28 positive out of total 55 mentions).

One political actor outside of BiH who is mentioned far more frequently than others is Donald Trump, who appears 137 times, out of which 95 are positive mentions. The second most represented person in the sample is Hillary Clinton, with a total of 63 mentions, all negative. Barack Obama and former US ambassador in BiH Maureen Cormack have also received only negative mentions.

Politicians belonging to the US Democratic Party have only received negative mentions; in contrast, Davin Nunes (US Congress Republican) is exclusively mentioned in positive light.⁶⁵ Political actors from countries other than the USA appear less frequently, with exceptions of Recep Tayyip Erdogan (with a slightly higher number of negative than positive mentions) and Vladimir Putin, who was represented in positive light every time he was mentioned (the same is true of Sebastian Kurz).

⁶⁵ Most of the mentions of US political actors come from the same series of articles related to the release of "Nunes Memo", arguing that the investigation of Russia's meddling into US elections started under false pretenses and presenting it as a conspiracy of Democratic Party and the "deep state", i.e. US intelligence agencies. <http://bit.ly/2H0Scft>.

The case of BiH

Name	Positive mentions	Neutral mentions	Negative mentions	Total
Donald Trump	95	6	36	137
Hillary Clinton	0	0	63	63
Aleksandar Vučić	28	18	9	55
Barack Obama	0	0	53	53
Devin Nunes	53	0	0	53
Recep Tayyip Erdogan	18	0	23	41
Vladimir Putin	38	0	0	38
Maureen Cormack	0	0	31	31
Bashar al-Assad	13	0	5	18
Sebastian Kurz	18	0	0	18

Table 5: **Political actors outside of BiH most frequently mentioned in the sample**

PORTRAYAL OF THE EU IN THE SAMPLE

In the context of political manipulations, the European Union appears mostly in a neutral frame: out of 36 mentions, 24 are neutral, 10 are positive and 2 negative. When other phrases related to the EU (Europe, European Commission, European Parliament) are added to this count, the ratio is similar: out of 59 total mentions, 39 are neutral, 13 positive and 7 negative.

This reflects the general consensus about the EU membership as a strategic goal of countries in the region, which is treated as a given in majority of these articles. Interestingly enough, even some of the articles which portray EU in a negative light hold on to this basic premise: while they use manipulative techniques to exaggerate the anti-enlargement sentiments in the EU, they do not question membership aspirations of states from the region.⁶⁶

Most of the positive or neutral mentions of EU-related actors are generated through the use of sensationalist headlines. These are typically found on anonymous websites located in the Federation of BiH which use clickbaits to create “fake good news” related to accession process.⁶⁷ Similar examples are found in articles which mention specific EU member states in the context of economic migrations, aiming to attract the “clicks” of BiH citizens who want to find work abroad (usually in Germany, which is overwhelmingly portrayed in positive light).⁶⁸ Misleading reports about specifics of EU accession process are sometimes also used as a backdrop for criticism of local actors, where EU appears as an antithesis and/or desired corrective mechanism to the disarray of local politics.⁶⁹

Compared to the positive or neutral image of the EU, the articles where the EU is a target of disinformation (portrayed in negative light) are less present in the sample, but with a far more emphasized political agenda. For example, there are very few clickbaits among those articles, but they are more political, drawing on conspiracy theories about “Western meddling” in the region.⁷⁰

⁶⁶ See, for example, a series of clickbait articles on several “portal farms”, with headlines claiming that the EU has “officially banned Serbia from entering EU until the end of 2027. Zulejhić, Emir. “**Klikbejt star pola godine.**” *Raskrinkavanje*, October 18, 2018. <http://bit.ly/2NKemTQ>.

⁶⁷ Brkan, Darko. “**Ni članstva, ni razloga za slavlje.**” *Raskrinkavanje*. February 12, 2018. <http://bit.ly/2GZdidZ>. (a clickbait headline reads: “Now it’s all clear, Bosnians can celebrate: Check out when Bosnia is entering the EU”, falsely implying that candidacy status has been granted to BiH).

⁶⁸ Zulejhić, Emir. “**(Malo) sutra u Njemačku bez vize.**” *Raskrinkavanje*. December 22, 2017. <http://bit.ly/2CfyGH> (a series of persistent “viral fakes” about Germany introducing the same employment conditions to EU and non-EU citizens, and/or abolishing work visas for citizens of Balkan countries)

⁶⁹ Livančić-Milić, Biljana. “**EU nije ozvaničila da smo najgori.**” *Raskrinkavanje*. August 16, 2018. <http://bit.ly/2NJRdaj> (a misrepresentation of the fact that the EC report is no longer called “progress report”, interpreted here in a clickbait headline reading: “We’ve reached rock bottom – EU officially recognized that we’re the worst: There’s no more progress, we’re heading to our doom”).

⁷⁰ Zulejhić, Emir. “**Ruske mape i evropska strategija proširenja.**” *Raskrinkavanje*. February 1, 2018. <http://bit.ly/2TdQYE9> (article centered around a map of Russian origin, showing redrawn borders in the Balkans, used to illustrate the clickbait headline reading: “The insight of a Croatian insider into an EU document: When everyone take what they need and Serbia, stripped bare, can enter EU in 2025”)

Conspiracies are generally the most frequent type of manipulation used here, sometimes targeting unspecified EU actors⁷¹ but predominantly focusing on individual states - specifically Great Britain, repeatedly accused of plotting against Republika Srpska,⁷² or even of planning the assassination of Milorad Dodik.⁷³

Other types of conspiracies appear as well, like those built around the racist narrative of "migrant invasion on Europe", presented either as a secret plan of unspecified EU entities,⁷⁴ or as a sign of European weakness as opposed to Russia's strength.⁷⁵

The leitmotif of weakness is closely connected to the portrayal of EU values as harmful and incompatible with the local culture, with emphasis on gender equality, LGBT and other minorities' rights.⁷⁶

While such types of articles do occasionally appear on anonymous websites and commercial media from FBiH, they are almost exclusively published by the media from Serbia and RS, such as *RTRS*, *ATV*, *Sputnik*, *Informer* and their anonymous "satellites".

⁷¹ Zulejhić, Emir. "**Infosrpska' – platforma za proizvodnju i distribuciju teorija zavjere.**" *Raskrinkavanje*. August 24, 2018. <http://bit.ly/2Tucjs3> (articles published by Infosrpska, Alternativna televizija, RTRS and Srna, accusing Center for investigative journalism from Serbia of being a "puppet" used by the US and EU donors to overthrow local governments).

⁷² Cvjetićanin, Tijana. "**Sputnik: Teorije zavjere o teoriji zavjere.**" *Raskrinkavanje*. January 19, 2018. <http://bit.ly/2VAuEBh>.

⁷³ Zulejhić, Emir. "**Atentat na osnovu raspoloživih informacija.**" *Raskrinkavanje*, March 9, 2018. <http://bit.ly/2tQz3UU>.

⁷⁴ Cvjetićanin, Tijana. "**Kako je 'vijest' sa Youtube-a završila na javnom servisu RS.**" *Raskrinkavanje* August 1, 2018. <http://bit.ly/2Tf7pQu> (fake testimony of violence committed by migrants which the media are "not allowed to report on", with a conclusion that it's "all a part of someone having a plan larger than anything we can imagine").

⁷⁵ Cvjetićanin, Tijana. *Raskrinkavanje*. February 22, 2018. <http://bit.ly/2ENrWmk> (fake account of mass fight between Russian men and migrants from the Middle East, who were beaten after sexually harassing Russian women; the made-up event is presented as "a proper way to deal with imposters", unlike the "unmanly" approach of the European Union).

⁷⁶ Zulejhić, Emir. "**Ni Švedanima nije potreban papir za seks.**" *Raskrinkavanje*. July 5, 2018. <http://bit.ly/2XGhJ2L> (series of articles claiming that Sweden and other EU countries would bring rape charges against anyone who doesn't obtain "written consent to sex" from a partner).

3.5. DISINFORMATION HUBS

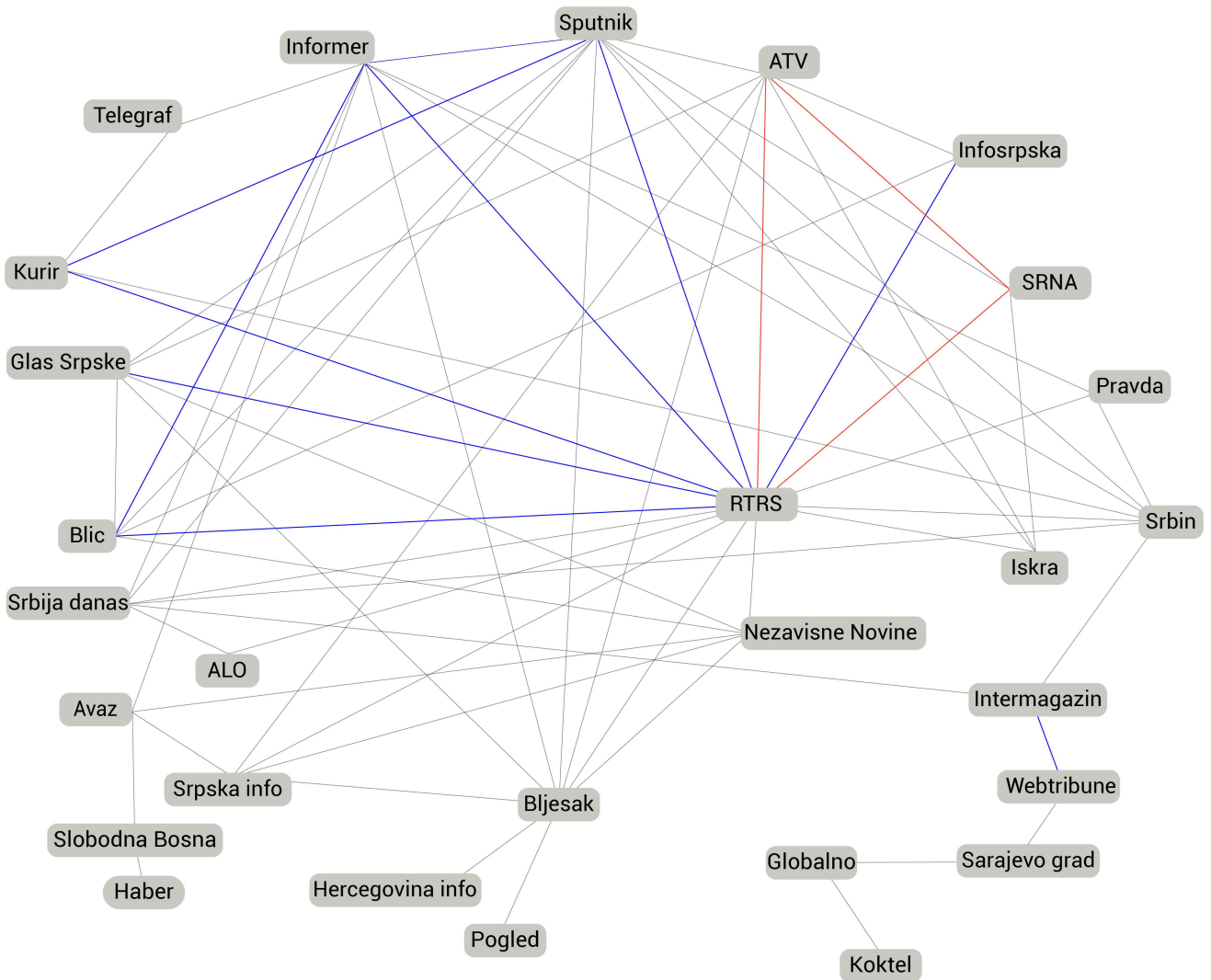
The data presented in this report so far shows various aspects of production and dissemination of political disinformation in BiH and the region. To fully understand the scope, patterns and motives which shape the content of political disinformation, it is necessary to also look into its “inner workings”, specifically the mutual connections of the media which create and disseminate it.

The basic step for establishing these connections is to look for **pairs** of media outlets which have published the same disinformation. Since the total number of such combinations for the entire database is too high to establish any patterns or regularities,⁷⁷ the search was narrowed to pairs among the **50 most frequent** publishers of disinformation which have **published the same disinformation at least 4 times**. In this manner, incidental connections are filtered out and more regular connections are established.

When these criteria are applied, the remaining combinations include 28 media which form 72 pairs among themselves. The media and their pairs are presented in the following graph:

⁷⁷ There are over half a million pairs if the sample includes all 477 media in the database and all cases when two media outlets have published at least one same piece of disinformation.

The case of BiH



LEGEND

- Same disinformation published 4-6 times
- Same disinformation published 7-10 times
- Same disinformation published more than 11 times

Figure 18: **Pairs of media outlets which have published the same disinformation at least 4 times**

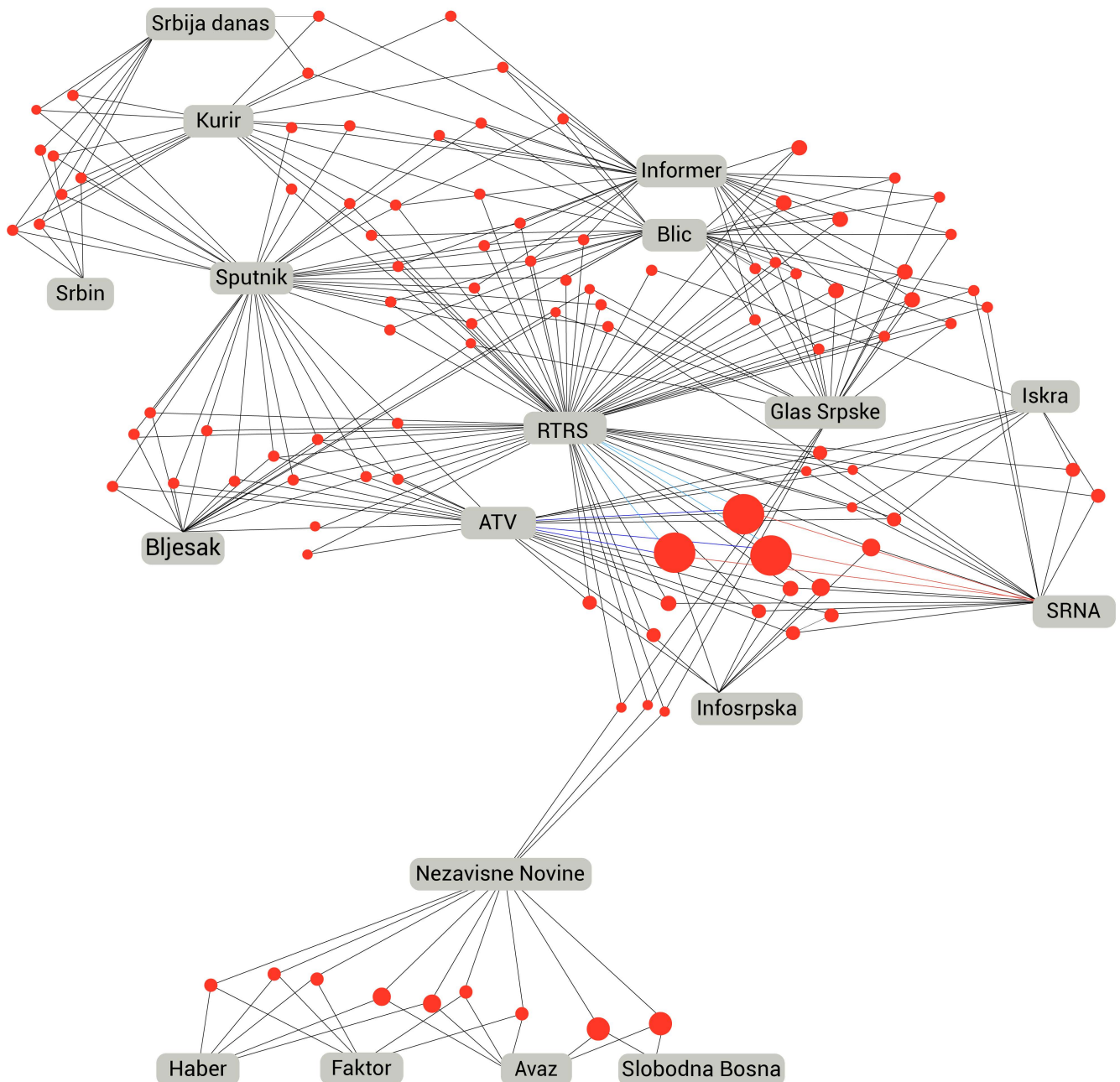
When repetitive and continuous connections are traced, very few anonymous media remain in this “disinformation hub”. Among them is one of explicitly partisan nature (*Infosrpska*, two which have the appearance of generic news portals (*Globalno*, *Koktel* and one typical “farm” portal (*Sarajevo grad*.)

These outlets are not, however, the ones with the strongest connections, i.e. influence on spreading of political disinformation. *RTRS*, as the most prominent source of disinformation in all categories (number of ratings, most frequent source and most frequent redistributor), forms the center of the main hub of disinformation, with the highest number of strong connections (same disinformation published more than 7 times) with other media. *RTRS* also has the highest number of connections with other media (16), while *Sputnik* is the second (11).

The database was further examined to establish more complex connections, taking into account only cases when **at least three media outlets have published the same disinformation at least three times**. This was determined using the association rule mining algorithm.⁷⁸

⁷⁸ To show how the media which are the most frequent sources of disinformation are connected with other media from the database, an algorithm was used for the entire database, setting the minimal threshold of mutual connection to more than two media which published the same disinformation at least three times, while the maximum is set to six. The information is filtered to exclude media appearing together only one or two times, which would detect about half a million combinations of lesser significance. The result is further filtered to a 100 "best rules" sorted by the 'support' value (100 strongest connections). The size of the circles shown in the image indicates the strength of connections based on the support value.

The case of BiH



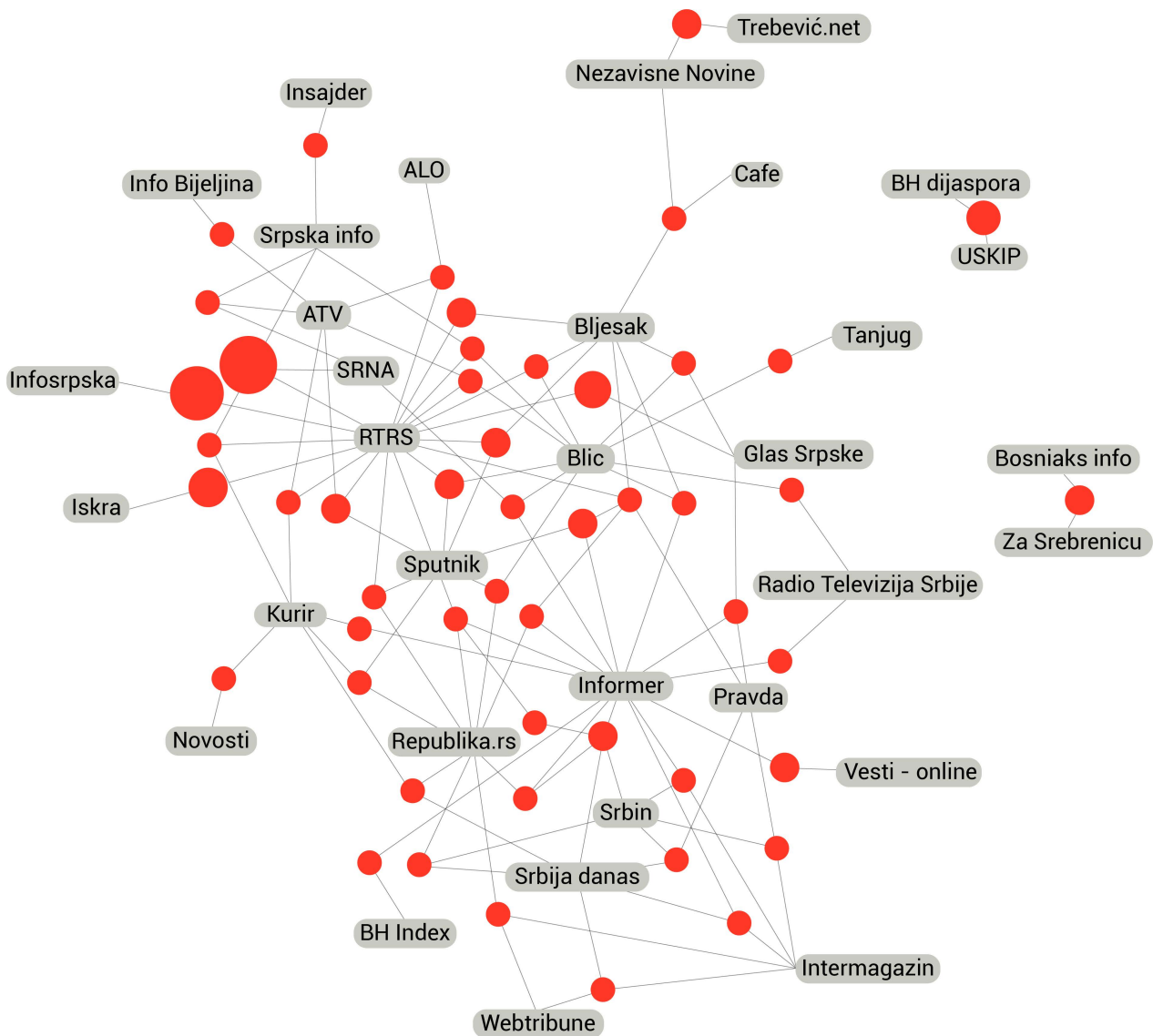
“Disinformation hub” detected at “100 best rules”

Figure 19: **Connections between groups of media which have published the same disinformation at least 3 times (by “100 best rules”)**

The points where the connections are the densest is where the most frequent publishers of political disinformation are placed. The strongest connections observed in this hub are between *RTRS* on one side and *Srna* and *Alternativna televizija* on the other. Prominent “tangled webs” are also formed around *Sputnik*, *Srbija danas*, *Kurir* and other media which rank high in roles of sources/redistributors of disinformation.

The media in the central positions are not just prolific publishers and redistributors of disinformation, but they also have the strongest influence when it comes to forming “disinformation clusters”, with the other media gravitating towards them.

Applying stricter filter⁷⁹ on these results, the image becomes less “crowded”, showing more frequent and stronger connections between certain media.



“Disinformation hub” detected at “50 best rules”

Figure 20: **Connections between groups of media which have published the same disinformation at least 3 times (by “50 best rules”)**

It is noticeable that almost all of the media which remain strongly intertwined at this level – but also dominate the overall results – are located in Serbia (15 media) and Republika Srpska (14 media). **These media form the only large “disinformation hub” in the sample**, which is also the only “web” of this magnitude that goes “across borders” of countries in the region. The media from the Federation of BiH which have similarly strong connections among themselves (*BH dijaspora, USKIP, Za Srebrenicu, Bosniaks*), appear outside of the hub, being connected only in pairs, and only in two cases.

⁷⁹ This is filtered by using “50 best rules” in the algorithm.

The only exception is *Bljesak*, the one media from the Federation of BiH which remains in the large disinformation hub through strong connections with several media located in Serbia (*Sputnik*, *Informer*) and Republika Srpska (*RTRS*, *Glas Srpske*). There is one peripherally positioned media from Republika Srpska, *Nezavisne novine*, which is connected to the general hub through its strong connection with *Bljesak*, rather than directly.

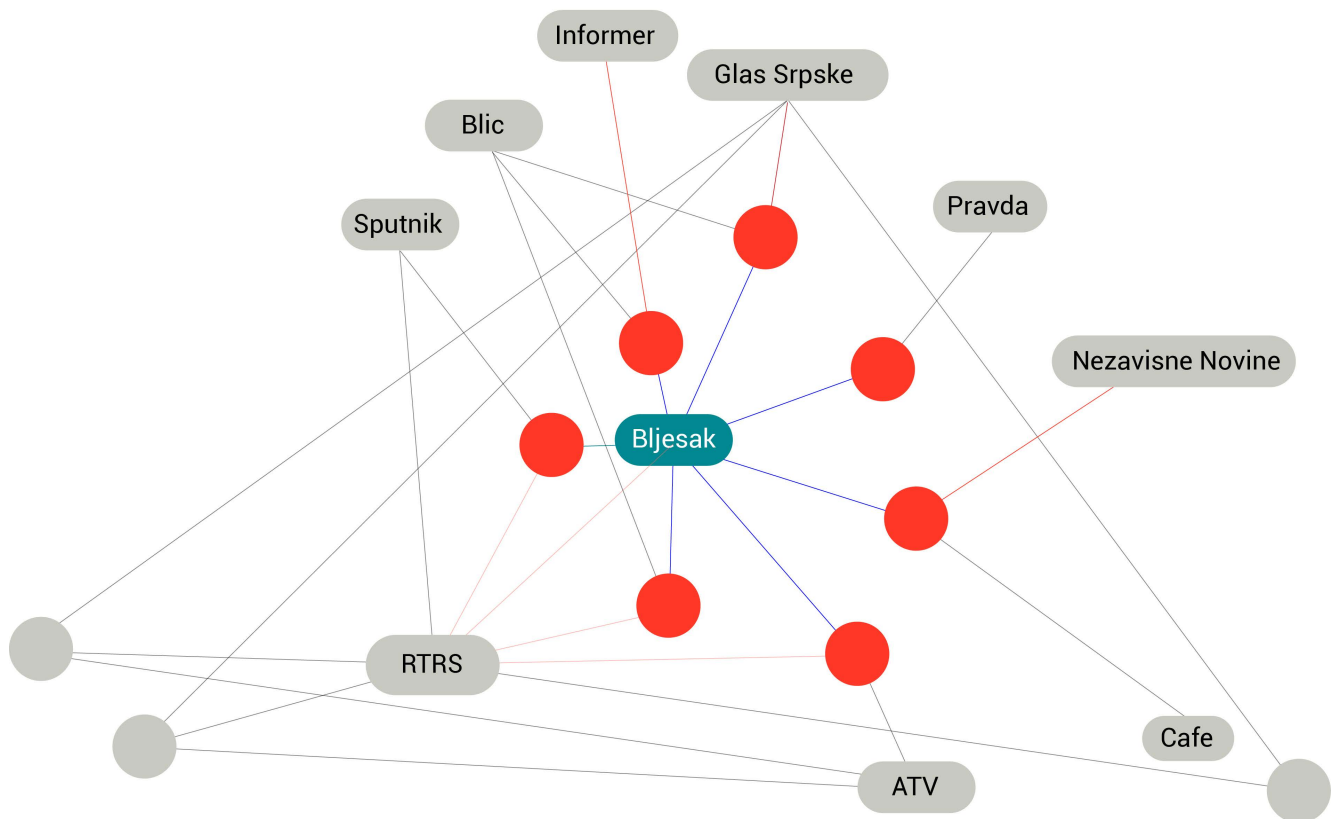


Figure 21: **Connections to the main hub: *Bljesak***

All three methods used to establish the mutual associations between the media in the data base point to the same finding – the existence of **one big disinformation hub which is political in nature**.

They show a number of media with significant mutual connections in terms of spreading the same disinformation with considerable frequency and consistency. These are mainly commercial and public media, but a few anonymous outlets and one foreign state-owned news portal also appear as a part of the hub.

The few separate pairs of anonymous portals, which appear outside of the large hub, are detected at this level of filtered “rule mining” due to the fact that this methodology is more sensitive to direct connections (those between two media outlets). When these “peripheral” connections are removed and the remaining media are grouped by country of origin, patterns of distribution of political disinformation between the most strongly connected media in the sample begin to show.

Disinformation in the online sphere

The image below shows the distribution of media outlets within the disinformation hub in Bosnia and Herzegovina and Serbia. The upper part of the graph shows media from Serbia and their connections with those from BiH, from weaker to stronger. The middle part shows the strongest connections between the media from Serbia and the media from BiH, seventeen altogether. The lower part shows media from BiH and their connections to those from Serbia, from stronger to weaker.

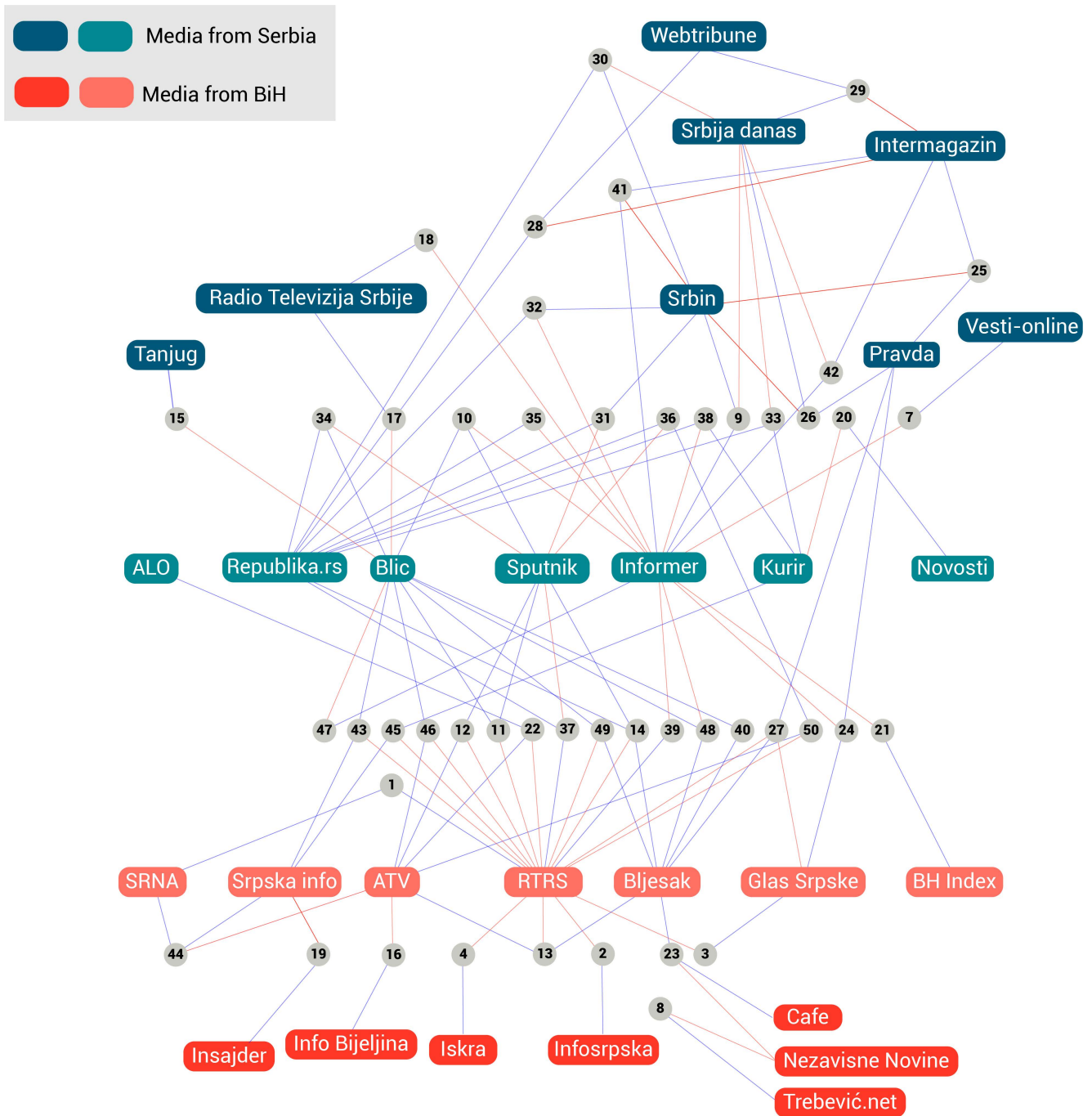


Figure 22: "Disinformation hub" by media location

The case of BiH

The material used for this research comes from the platform Raskrinkavanje which mostly fact-checks media reports related to Bosnia and Herzegovina. However, the largest disinformation hub detected by data analysis has more media from Serbia than from Bosnia, with the latter based mostly in Republika Srpska. This points out to a strong connection between news outlets from Serbia and RS in the context of publishing and redistributing political disinformation about topics relevant for Bosnia and Herzegovina.

The graph above shows the following patterns:

- The media from Serbia are both more present and more strongly mutually connected (20 mutual links) than the media from BiH (10 mutual links);
- There are 9 media from Serbia which have no direct strong connections to media from BiH and 5 media from Serbia which have at least one direct strong connection to media from BiH (top half of the graph);
- The media from BiH have overall more direct links to media from Serbia (17) than to other media from BiH (10);
- There are 7 media from BiH which have no direct strong connections to media from Serbia and 7 media from BiH which have at least one direct strong connection to media from Serbia (bottom half of the graph).
- Those media from Serbia with direct links to BiH have stronger mutual connections (five links: rules 36, 34, 38, 35, 10 on the graph) than their counterparts from BiH (four links: rules 1, 3, 14 and 44 on the graph);
- The main "connectors" of disinformation between Serbia and BiH are *RTRS* (12 links) and *Bljesak* (5) from BiH; and *Sputnik*, *Informer* and *Blic* (each with 7 links) from Serbia.⁸⁰

⁸⁰ *Blic* is also the owner of *Srpska info*, so this media outlet appears in overall 9 links between Serbia and BiH.

EXAMPLES OF CONTENT PRODUCED BY THE MAIN DISINFORMATION HUB

The media which are strongly connected in the main hub frequently publish the same disinformation, using each other as sources. The four analysis where most of these media appear together include two cases of **disinformation** related to BiH, one related to the USA and Russia, and one related to Serbia and Kosovo.

1. In July 2017, it was reported that "Pokop" (a public burial company from Sarajevo) is urging families of the deceased to pay the accumulated debts by putting stickers on grave sites for which maintenance wasn't paid. Four months later, *Glas Srpske* announced that "Pokop" was preparing to exhume graves of Serbs in Sarajevo. "Informer" further claimed that excavation of 13.000 grave sites of Serbs has already begun. This story has appeared in **16 media from this hub**, including *Sputnik, Informer, Blic, Alo, Kurir, Srbin info, Tanjug, Vesti online, Srbija Danas, RTS, Srbin*, and *Republika* from Serbia; and *RTRS, ATV, Glas Srpske*, and *Srna* from BiH.⁸¹

2. In June 2018, a small amount of weapons and ammunition remaining from the 1992–1995 war was discovered during demolition of an abandoned house in a village called Matuzići. Two days later, *Srna* reported that "a weapon storage near a mosque" was found there; it was further presented as an evidence of "paramilitary formations from the Federation BiH stockpiling weapons for an attack on Republika Srpska". The report was picked up by **13 media from this hub**, including *Sputnik, Informer, Blic and Republika* from Serbia; and *Srna, RTRS, Bljesak, ATV, Glas Srpske, Srpska info, Nezavisne novine, Iskra*, and *Trebević* from BiH.⁸²

3. In January 2018 *Srna* republished an old false claim that American philosopher Noam Chomsky called Albanians "a wild tribe" and described them as "ungrateful to Serbs in Kosovo who welcomed them to their territory". The story was picked up by **9 media from this hub**, including *Blic, Informer, Novosti, Srbin, Sputnik, Intermagazin*, and *Republika* from Serbia; and *RTRS* and *Srna* from BiH.⁸³

4. In February 2018, a well-known fake news website from the US claimed that actor Denzel Washington praised Donald Trump for saving USA from a war with Russia and becoming "an Orwellian police state". Anonymous portal *Webtribune* translated that article into local language, while *Sputnik* produced a follow up story, asking several pundits to comment on the made up statement. The story was published in **8 media from this hub**, including *Sputnik, Informer, Webtribune, Kurir, Pravda, Republika*, and *Srbija Danas* from Serbia; and *Iskra* from BiH (*Avaz* and *Aura*, which don't appear in the hub, have published it as well).⁸⁴

⁸¹ Cvjetičanin, Tijana. "Besprizorno poigravanje osjećajima ljudi: U Sarajevu nisu "prekopani srpski grobovi" - niti bilo čiji drugi." *Raskrinkavanje*. February 7, 2018. <http://bit.ly/2UkQnwZ>

⁸² Cvjetičanin, Tijana. "Kad porušena kuća postane 'ogromno skladište vojne opreme u blizini džamije.'" *Raskrinkavanje*. June 28, 2018. <http://bit.ly/2VDI2G2>.

⁸³ Cvjetičanin, Tijana. "Chomsky nikada nije rekao da su Albanci 'kao divlje pleme.'" *Raskrinkavanje*. February 1, 2018. <http://bit.ly/2ISbiWS>

⁸⁴ Cvjetičanin, Tijana. "Denzel Washington nije rekao da je Donald Trump 'spasio SAD od policijske države i rata sa Rusijom.'" *Raskrinkavanje*. February 15, 2018. <http://bit.ly/2H0Scft>.

The distribution of media types represented in this hub differs sharply from that in the general sample. Although they appear as main distributors of disinformation in the general sample, the anonymous portals don't have a prominent presence in the biggest disinformation hub. In contrast, there are only six anonymous portals in the hub formed by 29 most connected media outlets.⁸⁵

Media from Serbia	Number of direct links to BiH	Media from BiH	Number of direct links to Serbia
Sputnik	7	RTRS	12
Informer	7	Bljesak	5
Blic	7	ATV	4
Republika	5	Glas Srpske	2
Kurir	4	Srpska info	2
Alo	1	Srna	1
Tanjug	0	BH Index	1
RTS	0	Iskra	0
Webtribune*	0	Insajder	0
Intermagazin*	0	Info Bijeljina*	0
Srbija Danas	0	Infosrpska*	0
Srbinfo	0	Trebević net*	0
Vesti online	0	Nezavisne novine	0
Pravda	0	Cafe*	0
Novosti	0		

*Anonymous website

Table 6: **Media outlets in the "main disinformation hub"**

Out of those six, *Webtribune* and *Intermagazin*, both from Serbia, almost exclusively publish content related to politics, with a strong nationalist and pro-Russian bias. The same is true for *Infosrpska*, which, although anonymous, has proven to be an outlet of one political party (SNSD) and has been frequently used as a source of politically charged disinformation by the RS public broadcaster and public news agency.⁸⁶ It is also striking that the only large disinformation hub detected in the sample includes no less than five publicly owned media: two from Serbia, two from Republika Srpska and one from Russia. These are three public news agencies: *Tanjug*, *Srna* and *Sputnik* and the websites of two public broadcasters: *RTS* and *RTRS*. With the exception of *RTS* (*Radio-televizija Srbije*), all of these media appear as "connectors" between media from Serbia and media from BiH, most prominent being **RTRS with 12 direct links** and **Sputnik with 7 direct links**.

⁸⁵ Out of the six anonymous media, two are from Serbia and four from Bosnia.

⁸⁶ Cvjetičanin, Tijana. "Krizni PR' Dodika i Lukača: Ista meta, isto odstojanje." *Raskrinkavanje*. December 27, 2018. <http://bit.ly/2SEXgYh> (This analysis is not part of the original sample because it was published outside indicated time period); "Medijski linč u dvije slike." *Raskrinkavanje*. September 22, 2018. <http://bit.ly/2tMATjg>

SPUTNIK: CONTENT AND REACH

Sputnik is the only media with a presence in this hub which is owned by a state actor outside of the region. *Sputnik* is an outlet of *Rossiia Segodnya*, a news agency created in 2013 by an Executive Order of the President of Russia. The platform was launched in November 2014, replacing the previous radio network *Voice of Russia*.⁸⁷ *Sputnik* appears here through its Serbian-language outlet *Sputnik Srbija*, which also offers its radio broadcasts in local language to several radio stations from both Serbia and Bosnia. *Sputnik* is also very influential on social media. A year ago, *Sputnik's* Serbian edition had 90,057 followers on Facebook and 11,000 on Twitter.⁸⁸ In the meantime, these numbers have grown to 119,198 and 15,100 respectively.⁸⁹

Over the course of one year covered by this research, *Sputnik* has been rated by *Raskrinkavanje* 36 times for disinformation published in 16 articles.⁹⁰ Its extensive interest in BiH politics has also been analyzed in an article published in January 2018, where *Sputnik's* headlines and articles about Bosnia were examined for content and tone.⁹¹ An analysis of several hundred articles published over the course of three months has shown that 80 articles were dedicated to BiH or BiH-related topics, all with a clear editorial bias (a positive attitude towards Milorad Dodik and/or SNSD). This was confirmed in another analysis *Raskrinkavanje* has published in September 2018, during the pre-election campaign in Bosnia and Herzegovina, where *Sputnik* has acted as *de facto* Dodik's campaign outlet.⁹² Among the topics where Dodik's and *Sputnik's* narratives were in congruence, those related to geopolitical issues were prominent. Several EU countries, as well as NATO – with emphasis on the latter – were presented in these narratives as a threat to Serbs, Republika Srpska, or Milorad Dodik in particular. Mladen Ivanić, Dodik's main campaign opponent at the time, was frequently presented as a "puppet" of these foreign actors and/or implicated in several conspiracy theories about surveillance, alleged coup plans, or "colored revolutions" planned by EU or NATO countries in Republika Srpska.

None of those articles appear in this sample because they were not individually rated in the analysis. This is, however, yet another indicator of highly biased reporting and strong connections with SNSD controlled media from BiH, showing that *Sputnik* uses the same pundits, shapes the same narratives and highlights the same topics when covering events related to BiH politics, as *RTRS*, *Srna*, *ATV* and others.

⁸⁷ *Sputnjik*. <http://bit.ly/2lO9VZ8>

⁸⁸ Brkan, Darko. "'Sputnik' o Bosni: Medijski 'zastupnik' Milorada Dodika." *Raskrinkavanje*, January 8, 2018. <http://bit.ly/2EA2C21>

⁸⁹ *Sputnik*. <http://bit.ly/2VDl8gS> and <http://bit.ly/2TtlVf>

⁹⁰ *Sputnik*. <http://bit.ly/2XD0Gi0>

⁹¹ Brkan. 2018. "'Sputnik' o Bosni."

⁹² Cvjetičanin, Tijana. "'Sputnik Srbija' i izbori u BiH: O Dodiku sve najbolje." *Raskrinkavanje*. September 29, 2018. <http://bit.ly/2lRxu3l>

The case of BiH

The fact that Sputnik and RTRS appear as the main “connectors” in this disinformation hub is an additional proof of this media's influence and connections to local politics.⁹³

Sputnik also plays a prominent role in the shaping of narratives about “West vs. Russia”, which are often amplified by other media appearing in this disinformation hub, both from Serbia and from Republika Srpska.

⁹³ U.S. Government. “**Putin's Asymmetric Assault On Democracy In Russia And Europe: Implications For U.S. National Security.**” A Minority Staff Report Prepared For The Use Of The Committee On Foreign Relations United States Senate One Hundred Fifteenth Congress Second Session. January 10, 2018. <http://bit.ly/2tQC2g4>.

3.6. DISINFORMATION CLUSTERS

Clusters are smaller groups comprised of three or four media which form strong mutual connections in that they frequently use each other as sources of disinformation. They can also be described as smaller “disinformation hubs” with a single media outlet in the center.

The connections of the media which are the most frequent sources of disinformation⁹⁴ were examined through association rule mining algorithm to identify their “clusters” – a group of media which frequently and regularly publish the same disinformation in the center, while also being strongly connected to each other.⁹⁵ Five of those media (*RTRS*, *Infosrpska*, *Srna*, *Srbija danas*, *Informer*) appear in the general “disinformation hub”. Their individual clusters comprise almost exclusively of media from the same hub, once again reflecting the strong connections between them. The only exception is *Srna*, whose individual cluster includes one media (*Dnevnik.ba*) which is not present in the large “disinformation hub”.

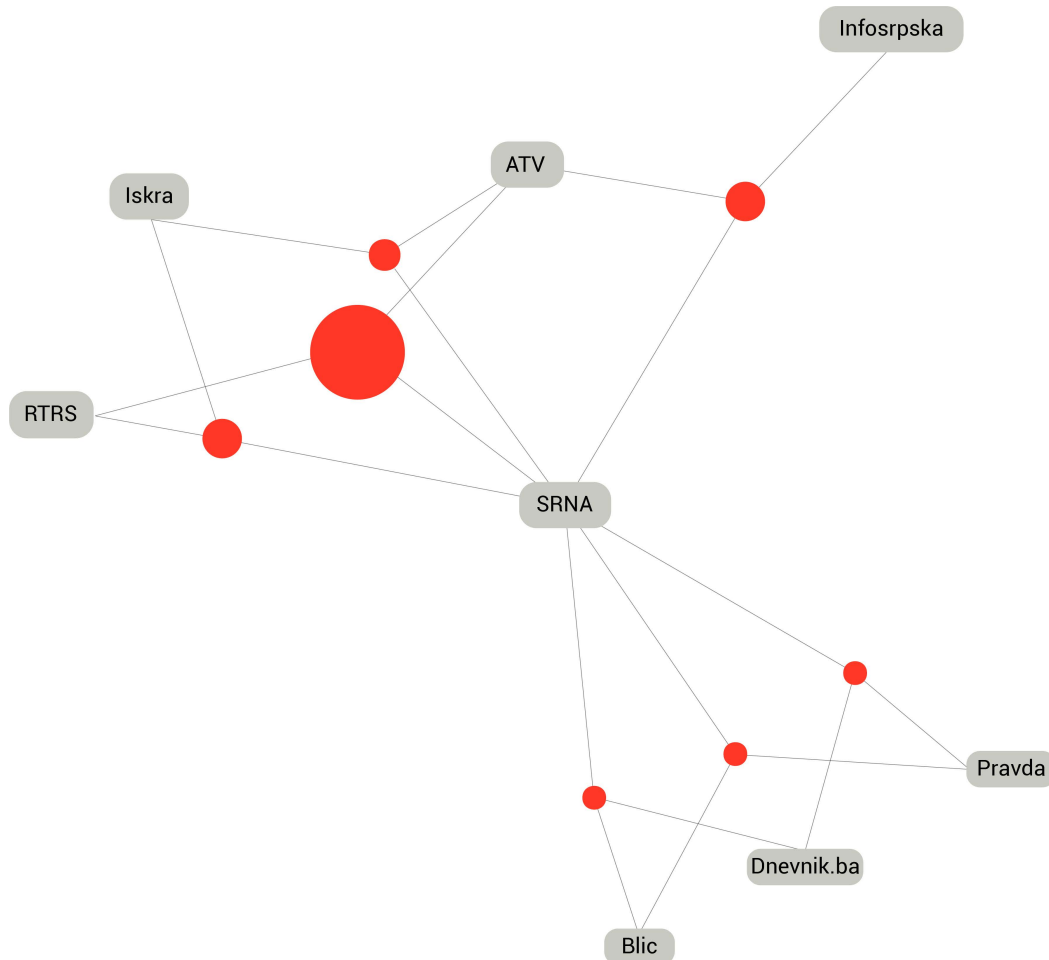


Figure 23: **Srna's cluster**

⁹⁴ See Figure 11 in this report.

⁹⁵ The number of “best rules” used to establish clusters depends on the presence of the central media in the sample. The number of rules was chosen based on how many ratings each media has received (how many times it appears in the sample), so that it can filter out accidental connections and show only significant associations with other media which have similarly strong mutual connections (i.e. repeatedly publish the same disinformation).

The case of BiH

For some of the websites appearing as top sources of disinformation, such as *BH dijaspora* and *BNN*, no repeated strong connections were found, indicating that they are mostly “isolated” sources/redistributors of disinformation.

Dnevni Avaz, one of the most influential *dailies*— both its print and digital editions - is often a source, as well as the redistributor of political disinformation. It however does not fit into any large disinformation hubs, indicating that it publishes or redistributes disinformation on various topics, not relatable to any larger agenda. Based on the content analyzed from the website, it can be stated that this disinformation is mostly driven by partisan day-to-day politics (related with the paper’s connections to political party SBB BiH), with occasional nationalist narratives (*Avaz* also often publishes disinformation related to the presence of foreign migrants and refugees, which is an issue exploited by media of various political orientations⁹⁶).

This is reflected in rather random connections it forms with multiple media outlets which are either not mutually associated, or are very loosely mutually related.

Avaz ranks similarly to *RTRS* as source/redistributor of disinformation, but the comparison between their clusters shows clear difference in regularity and strength of mutual associations between other media which appear in their clusters: far looser connections are present in the *Avaz* cluster than in *RTRS* cluster.

⁹⁶ See: <https://raskrinkavanje.ba/medij/avaz>

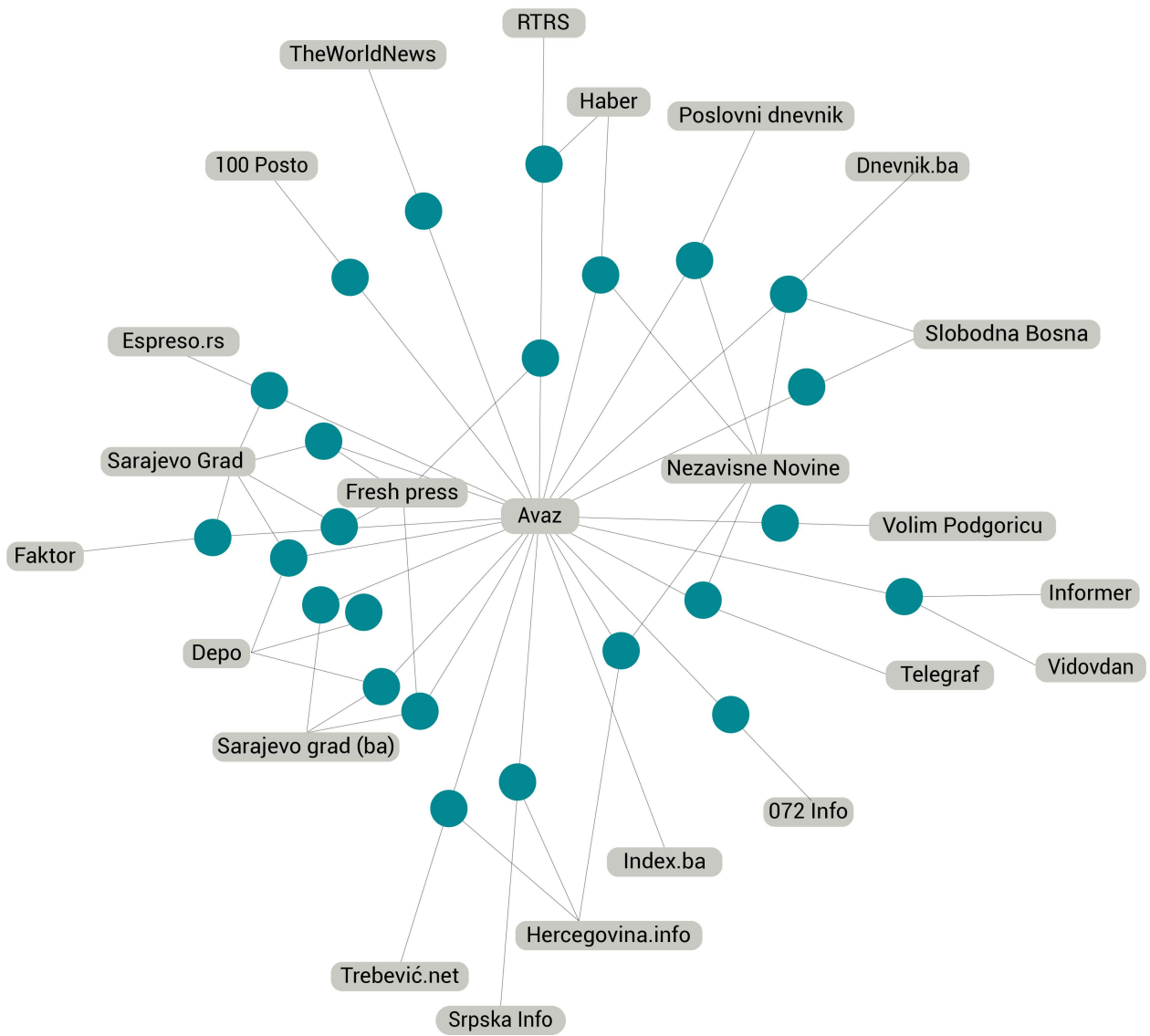


Figure 24: **Avaz cluster**

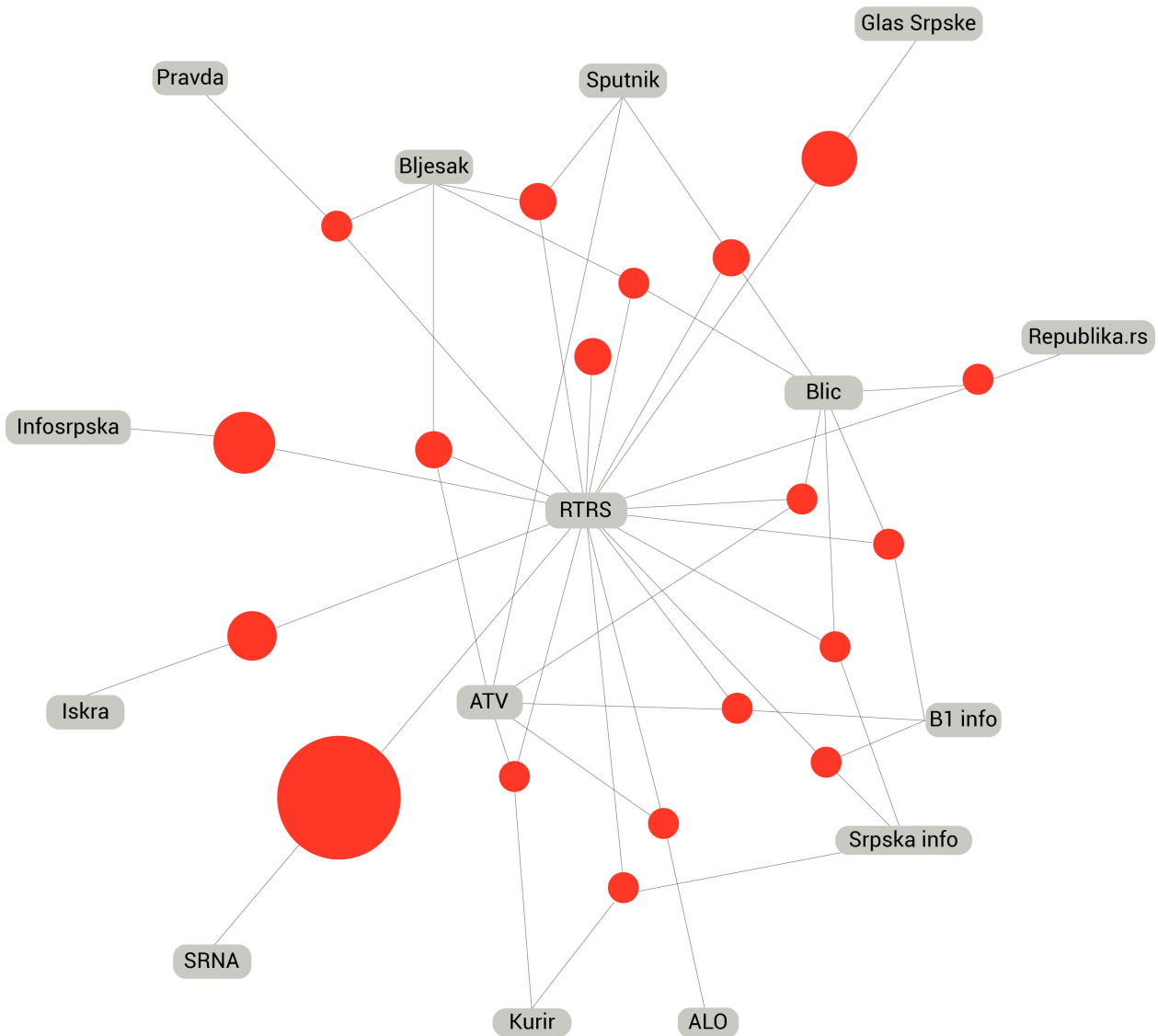


Figure 25: **RTRS cluster**

As stated above, *RTRS* and *Sputnik* appear as the main “connectors” between media from Serbia and media from BiH in the large disinformation “hub”. This is confirmed by the structure of their clusters, both of which have an almost equal number of media from each country. The distribution of mutual connections of other media in these clusters is, however, somewhat different: *Sputnik’s* cluster shows stronger connections between media from Serbia, while *RTRS* cluster has a rather even distribution of strong mutual connections between the media from both countries.

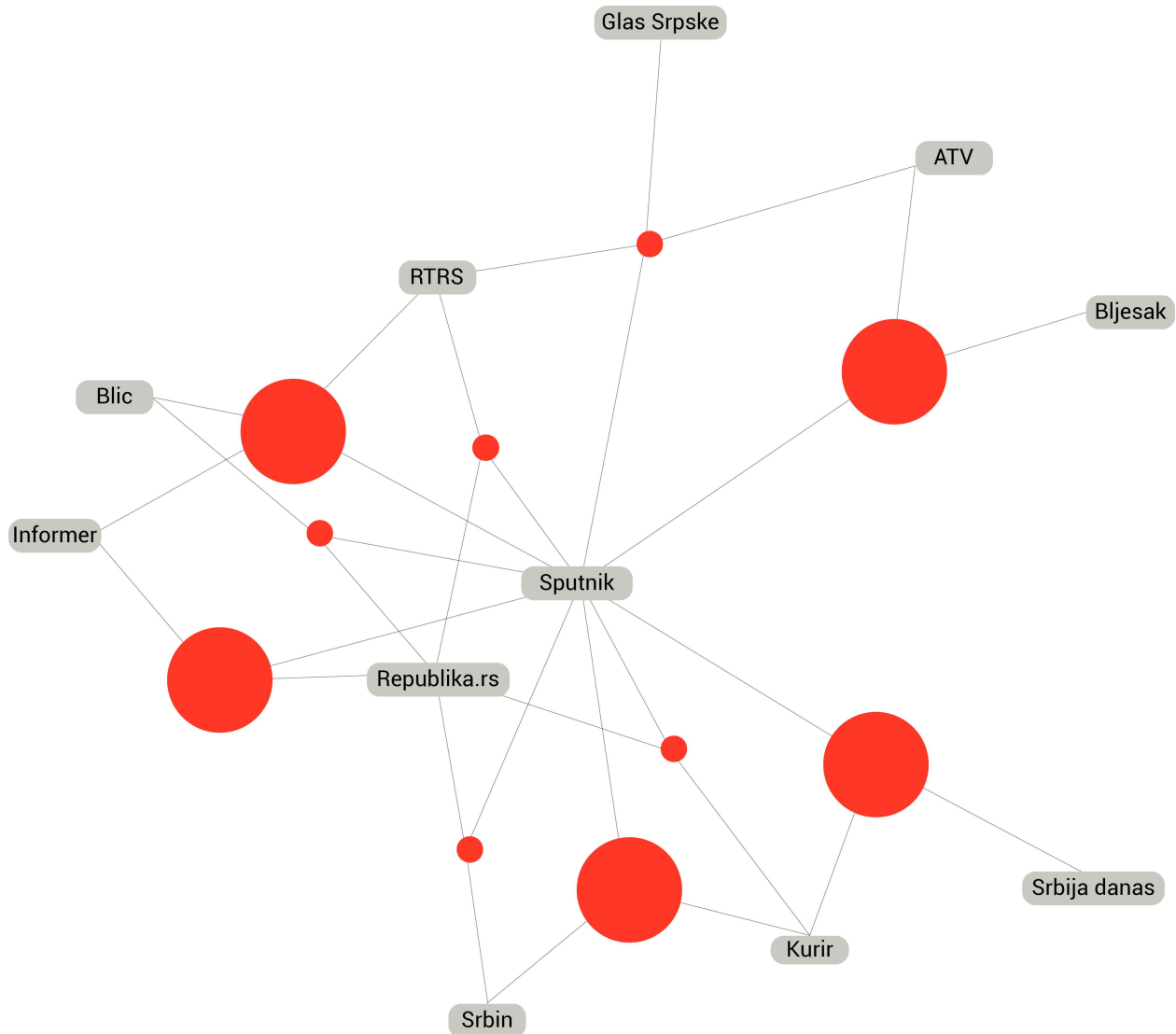


Figure 26: **Sputnik cluster**

The remaining two BiH-based media from the top-ranking disinformation sources are anonymous websites *Poskok* and *Medion*. *Poskok* is a portal with strong political agenda, focusing especially on Croat people in Bosnia and Herzegovina, while *Medion* is a commercial “fake news website”, with no clear political agenda.

Medion appears in the same cluster as another highly ranked source of disinformation (anonymous portal CIK), where most of the other media are similar anonymous websites which publish various types of disinformation. Their connections are not strong and come mostly from the fact that they publish disinformation which appear as daily “hot topics” in the BiH online media sphere. By contrast, when comparing this with *Inforsrpska* – also an anonymous website – there are much stronger connections between this website as the center of the hub and the media it's associated with (which also form strong mutual ties). Unlike *Medion* cluster, the whole cluster of *Inforsrpska* is tightly interconnected.

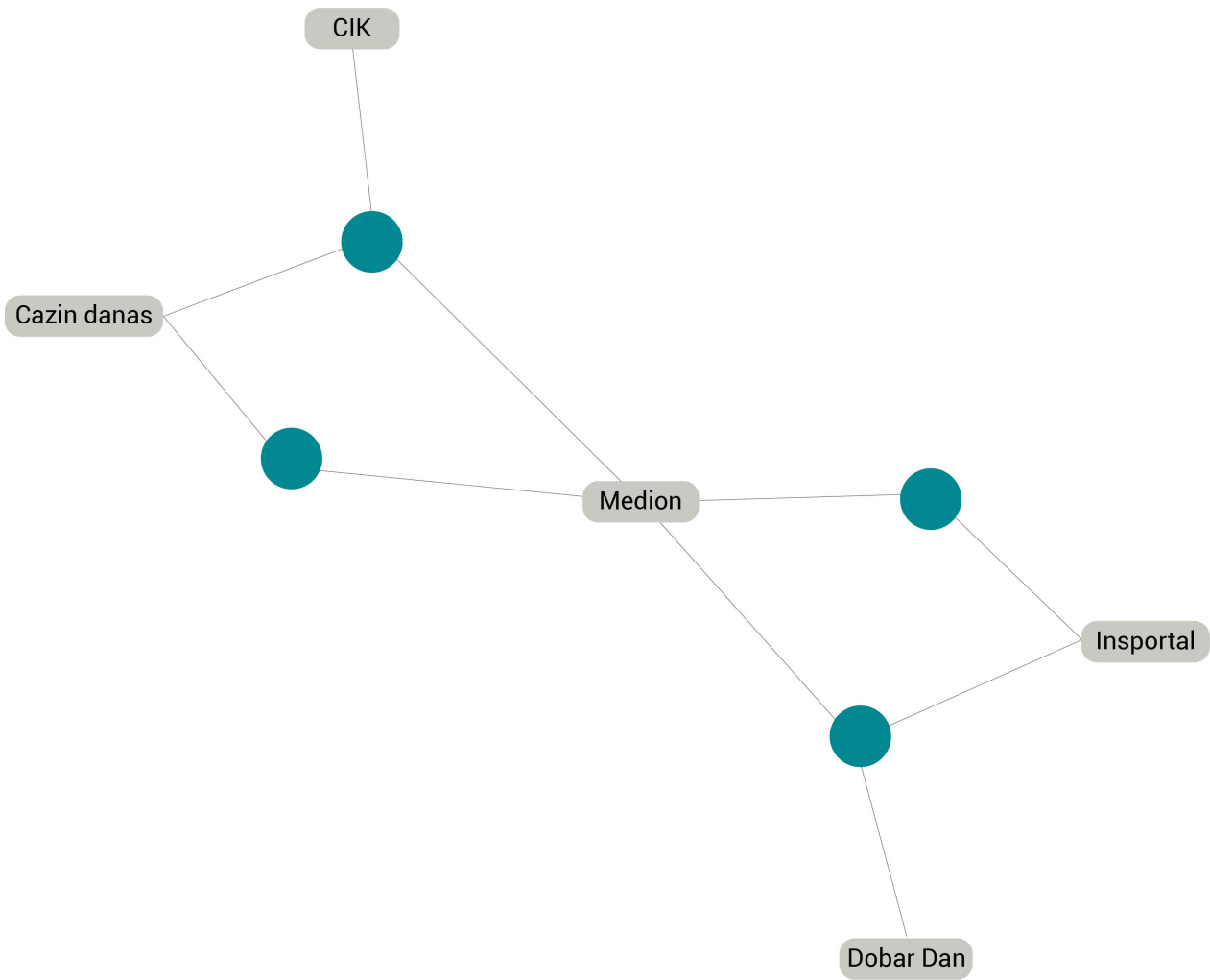


Figure 27: **Medion cluster**

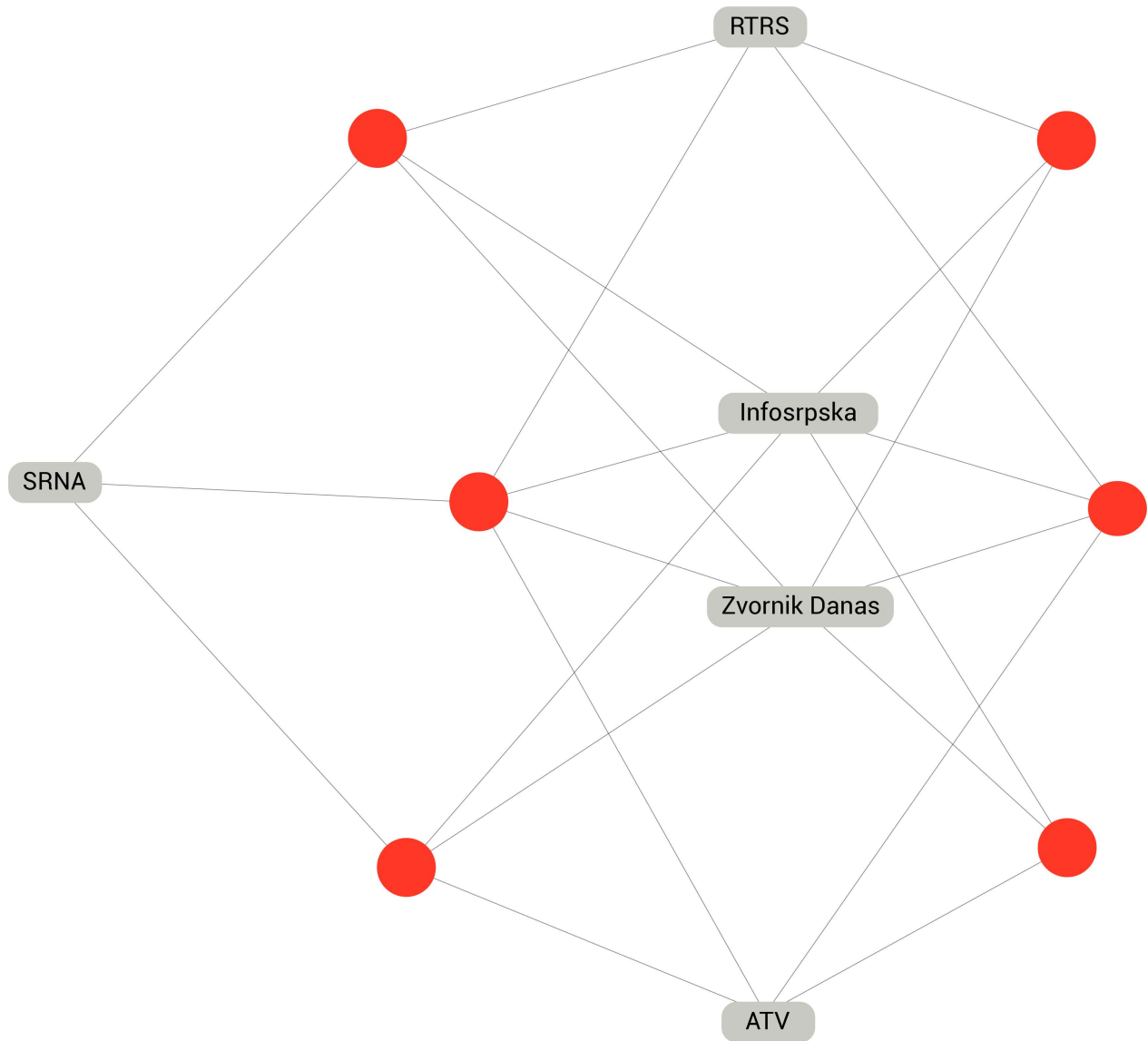


Figure 28: **Infosrpska cluster**

The cluster which is formed around *Poskok* bears much closer resemblance to that of *Infosrpska*, both in content (individual outlets appearing in the cluster) and in the type of identified associations. Moreover, it can be observed that all the media present in *Poskok*'s cluster are a part of the large disinformation hub.

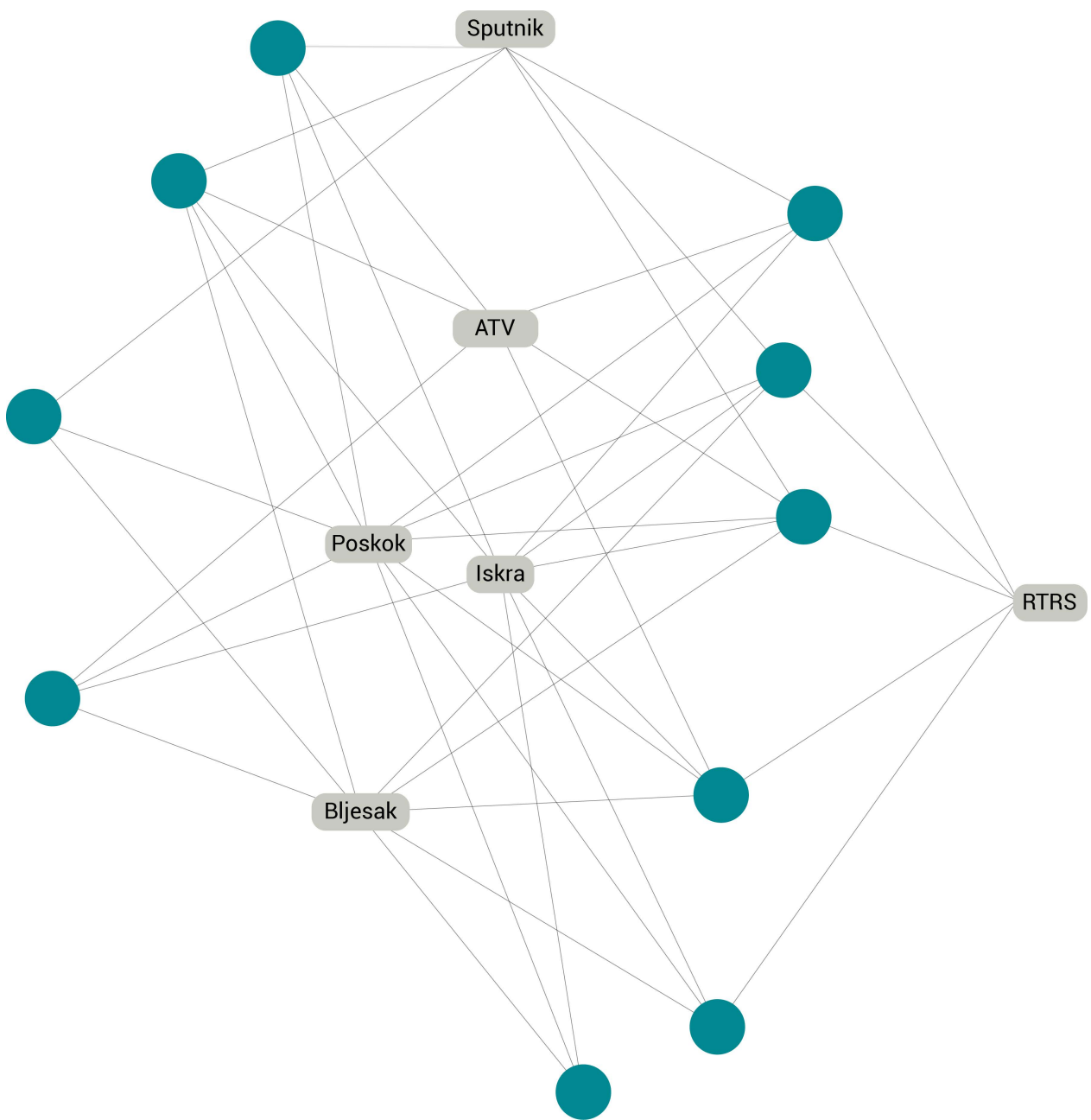


Figure 29: **Poskok cluster**

When the clusters of individual media outlets are examined, two overall patterns emerge:

- Political disinformation published by commercial anonymous portals tends to be more dispersed in terms of associations with other media, indicating “randomness” in selection of topics and issues which are misrepresented in these media outlets. These are the websites which extensively publish other types of disinformation as well, in large majority of cases motivated solely by economic gain (also strongly indicated by the presence of “clickbait” rating on these websites).
- Websites with strong political inclinations, whether anonymous, commercial or publicly owned, tend to form strongly interconnected clusters, indicating the existence of a political agenda.⁹⁷ Among the websites which incline towards local ethno-national narratives in their reporting, those which tend to predominantly “speak” to Serb and Croat audience appear in the same clusters more frequently, while the websites which are predominantly oriented towards Bosniak audience don’t have similar connections and are only randomly associated with websites from the other two groups.

CASE STUDY: USE OF POLITICAL TOPICS FOR ECONOMIC GAIN BY ANONYMOUS PORTALS

A made-up story about Danijel Subašić, the goalkeeper of Croatian national football team, published by an anonymous website *Životni stil*, became one of the most widely spread fake news in the region, both by entering the mainstream media and by its circulation on social media.⁹⁸

On July 11, 2018 national teams of Croatia and England played a semi-final match of FIFA World Cup. The same day *Životni stil* published an article which claimed that Danijel Subašić dedicated the semi-final game to Mothers of Srebrenica in a press conference held before the match. The article was obviously not proofread, containing a number of spelling and grammar errors; nor did it identify any sources of the published information. Despite such clear signs of potentially inaccurate information, the media had instantly picked up on it and shared it at such speed that it became a social media sensation. Many media outlets in BiH and the region published it without verifying the claim, despite the fact that Subašić wasn't even present at the Croatian team's press conference, which was public information.

⁹⁷ In some cases, coordination in publishing disinformation in such clusters was already established by Raskrinavanje's analysis. For coordinated disinformation campaigns between *Infosrpska*, *Srna*, *RTRS*, and *ATV*, see: Cvjetičanin. 2018. “Krizni PR' Dodika i Lukača”

⁹⁸ *Životni stil* translates as “Lifestyle”. The portal was shut down after *Raskrinkavanje* revealed the identity of its owner, who has owned several “portal farms” in the past few years.

Upon the success of the first story, similar statements were soon attributed by the same source to Croatian player Luka Modrić and Kolinda Grabar Kitarović, the president of Croatia.

Several journalists and media professionals have pointed out the inaccuracy of the story and urged social media users to stop sharing the false information. On July 12, *Raskrinkavanje* published a debunking analysis⁹⁹ of the article. The next day, during the interview with Subašić, Igor Štimac, a reporter for *Večernji list* (Croatia) stated as a fact that Subašić has dedicated the match to Mothers of Srebrenica and proceeded to ask him who the next match will be dedicated to. Subašić avoided giving a clear answer, but hasn't denied the claim.

This interview triggered a wave of articles about Subašić's "confirmation" of the authenticity of the statement. This "news" was published even by the media which did not publish the original story; those who had, used it as a proof that they were "right the first time." *Raskrinkavanje* published a follow-up analysis¹⁰⁰ on July 17, after additional verification of facts confirming the falsity of the story. This was additionally confirmed on July 19 by official responses from the Croatian Football Association and the Office of the President of Croatia, denying all claims published by *Životni stil*.

The original article on *Životni stil* gathered about **44,000 page views** in five days, and it had **14,200 shares** on Facebook. Within five days, **31 media outlets redistributed** the story and the false statement which gave them more than **22,000 reactions** on Facebook. Memes and article screenshots of these stories were also popular on Facebook and Twitter, amounting to more than 14,000 interactions.

After *Večernji list* published the interview with Subašić, **46 media outlets** presented it as a definite proof of the alleged statement. This time there were much more "legitimate" media which published these articles, unlike the first time when anonymous websites were in the majority. Forty-six follow up articles gained more than **17,000 interactions** on social media. Many of these articles and posts were taken down after the story was debunked, so these numbers don't fully reflect the magnitude of reach which this false story has had.

⁹⁹ Cvjetičanin, Tijana. "Fudbal, Srebrenica i lažni mediji: Genocid kao izvor klikova." *Raskrinkavanje*. July 12, 2018. <http://bit.ly/2C3gwsS>

¹⁰⁰ Cvjetičanin, Tijana. "Kad laž naknadno postane istina." *Raskrinkavanje*. July 17, 2018. <http://bit.ly/2uKfRlv>

4. MEDIA/DIGITAL MEDIA ENVIRONMENT: LEGISLATIVE FRAMEWORK AND AWARENESS OF THE STAKEHOLDERS

Legally binding regulatory framework for media in Bosnia and Herzegovina includes electronic media broadcast via terrestrial signal and cable distribution. The state Communication Regulatory Agency (CRA) regulates the sector, applying the Policy of Broadcasting Sector, BiH Law on Communication and several Rules and Regulations adopted by CRA, also touching upon the issue of broadcasting false or misleading content.

Online and print media are a part of a self-regulatory system, which is supervised by the non-governmental organization Press Council in BiH (PC), whose members are print and online media outlets. Based on the complaints of the citizens, Press Council first tries to mediate and resolve the issue, and if mediation does not lead to resolution, then the Complaints Commission of the Press Council judges whether the content in question violates any of the journalistic norms defined in the **Press and Online Media Code of BiH**. It is however up to each media outlet whether they will implement certain ruling of the Complaints Commission, i.e. delete, retract certain content or publish a retraction or an apology.

4.1. LEGISLATIVE AND REGULATORY FRAMEWORK

Regulation of TV and radio content is primarily based on citizen complaints which are then processed by CRA. CRA also conducts occasional monitoring of media content *ex officio*, but has limited capacities for such endeavors. CRA has the executive powers and for violations of broadcasting rules and regulations it can issue oral or written warnings, corresponding fines, as well as temporary or permanent suspension of broadcasting licenses.

TV and radio content is primarily regulated based on the **Code on Audiovisual Media Services and Radio Services** (hereinafter Code on Media Services). Disinformation is specifically mentioned in The Code on Media Services as "false and misleading audiovisual and radio program" (Article 7). More specifically it is forbidden to broadcast content "for which it is known or can be established based on common sense or routine check that it is false or misleading, or for which there is a justified assumption that it is false or misleading" (paragraph 1, Article 7).

Broadcasters are obligated to publish correction in the shortest time possible, if it is later established that broadcasted content is false or misleading (paragraph 2).

The case of BiH

In addition, disinformation relates to some of the general principles defined by the Code on Media Services, primarily in the parts that spell out that:

"Audiovisual media services and radio media services will in no way misuse and/or manipulate superstitions, fears and credulity of individuals or public, nor will they incite potentially damaging behaviors" (Article 3, paragraph 6).

"Audiovisual media services and radio media services will not transmit clear and direct risk of causing negative consequences which include but are not limited to death, injuries, damage to property and other types of violence or disruption of police activities, medical services or activities of other services for maintaining public order and safety (Article 3, paragraph 9).

Furthermore, in Article 5, paragraph 1 it is stipulated that "accuracy of presented information will be assured in all programs, in particular informational-political and program on current affairs. All discovered mistakes will be timely corrected". In the context of disinformation, also several other articles can be relevant, including for example those pertaining to alternative medicine or paranormal activities. These articles state that:

"All content on paranormal and parapsychological phenomena will be particularly balanced in a sense of comparison between scientific and nonscientific insights on these phenomena" (Article 12, paragraph 1). Broadcasting of content on these issues is limited only to the period between 24:00 and 6:00 hours.

"All content on alternative medicine will include clear and univocal indications that these are the means of treatment that are not based on ruling medical doctrine, and will not propagate these means of treatment as the only or the best ones. In this content it is preferable to assure an opinion and participation of authorized medical expert" (Article 13).

"Content on quackery will not be provided, unless if it is pointing to its damaging consequences" (Article 14).

CRA also publishes the Guidelines for Implementation of the Code of Audiovisual Media Services and Radio Media Services, where these stipulations are elaborated in more detail.

Each of the mentioned violations can be subjected to corresponding financial fines (see Table 1), specified in the **Overview of Violations and Corresponding Sanctions Ruled by the Communications Regulatory Agency** (hereafter the Overview of Sanctions).

Violation area	Corresponding fine
Basic principles, Article 3 of the Code	BAM 1,000 to 75,000 (Article 18, Overview of Sanctions)
False or misleading content	BAM 1,000 to 30,000 (Article 22, Ibid.)
Alternative medicine	BAM 1,000 to 30,000 (Article 28)
Quackery	BAM 2,000 to 60,000 (Article 29)
Paranormal and parapsychological phenomena	BAM 1,000 to 60,000 (Article 27)

Table 7: **Violations and corresponding CRA sanctions (fines) related to disinformation**

In the broadcasting sector, the content of commercial communication, i.e. of advertising, is also regulated by The Code on Commercial Communication, among other things, in order to prevent that such content incites behavior that is damaging for health or security (Article 3, paragraph 4, point d.), or promotes quackery (Article 2, paragraph 11), while content which focuses on paranormal phenomena and services is limited to period from 24 to 6 hours (Article 3, paragraph 13). CRA provides additional elaboration of these rules in the Guidelines for Implementation of Code on Commercial Communication.

In an interview with Helena Mandić (assistant director of broadcasting, CRA), it was pointed out that in all cases related to disinformation in the past few years, the Agency has sanctioned the broadcasters for biased reporting. Mandić noted that the sanctioned media do pay fines, but “they don’t significantly change their reporting, nor do they pay the fines voluntarily, showing that this (publishing disinformation) is clearly their editorial policy,” rather than a consequence of unprofessional reporting or unintentional errors.

Other interviewed stakeholders have divided opinions on the effects of CRA sanctions. Some consider the CRA to be of a questionable objectivity, given that it is appointed by political bodies; consequently, they think that CRA “sanctions the media selectively”, penalizing some and giving others a “free pass”. Other interlocutors don’t find the CRA to be politically influenced, but point out that it only takes action on basis of the received reports and they recommend establishing a continuous media monitoring instead, considering it a way to have more consistent and more efficient sanctioning policy.

Some have also expressed opinions that the sanctions fail to change the media’s behavior because 1) CRA avoids sanctioning in general and only resorts to it when it cannot be avoided; and 2) the fines are too low and the media which break the Code count on them in advance, given that the profit made by publishing disinformation is much higher than the fines they pay if sanctioned.

Overall, there are more stakeholders who consider the regulatory framework to be good, but not implemented thoroughly and consistently, than those who think that the regulatory framework itself is inadequate and needs to be reformed.

The general weaknesses of media framework concerning their ownership and funding of media which are relevant to all administrative levels are important for determining the position and role of media and will be addressed later in this report.

UNDERSTANDING OF DISINFORMATION PHENOMENON IN THE EXPERT COMMUNITY IN BIH

The interviewed representatives of institutions, regulatory and self-regulatory bodies, media professionals and academics in the field are in unison in recognizing the issue of media disinformation as an omnipresent problem in Bosnia and Herzegovina. Majority of interviewees consider disinformation to be *intentionally created* for either political or financial gain (only one out of 16 interviewees said that he considers disinformation to be anything that is false, regardless of the intention behind publishing such content).¹⁰¹ Many also point to the fact that "fake news" (entirely fabricated, factually incorrect claims) are not the only, nor the most common type of disinformation present in the media in BiH. Disinformation is rather seen as misleading or inaccurate content placed in texts and reports which contain some accurate information as well.¹⁰²

Most of the interviewees think that political interests are the primary motive behind media disinformation. Connection between political parties and the media has generally been observed as "common knowledge" for years.¹⁰³ These connections are realized either by political instrumentalization of existing media outlets¹⁰⁴ or through online "media" created with sole purpose of peddling political disinformation.¹⁰⁵ The specific manifestations of political influence identified by the interviewees as the most common are media self-censorship and biased reporting.

Except for the political instrumentalization of the media as the main cause behind proliferate political disinformation, the interviewees also point to the weaknesses inherent to the media scene in BiH, which exacerbate the problem. Lack of professionalism is among the most commonly mentioned factors, brought about by financial insecurity of the media which leaves them both vulnerable to political influence and unable to hire quality staff and produce quality work.

¹⁰¹ **Dejan Jazvić**, *chief editor of FENA*: "Anything the media publish which turns out to be inaccurate or false, regardless of whether they do it knowingly or not"

¹⁰² **Helena Mandić**, *assistant director of broadcasting of the Communications Regulatory Agency (CRA)*, notes that "In all cases related to disinformation in the past few years, the Agency has sanctioned the broadcasters for biased reporting - it wasn't outright false news, but manipulation of facts aimed to produce skewed image (of the reported topics) in the public."

¹⁰³ Media Sustainability Index (MSI) 2001, <http://bit.ly/2EP0Dln> and MSI 2018, <http://bit.ly/2VBS3T2>

¹⁰⁴ **Jasmin Begić**, *journalist, TV Sarajevo*: "Every big political party in BiH today has its own media used to influence the public and other parties. There's only a few media who work in public interest."

¹⁰⁵ **Ljiljana Zurovac** from *The Press Council in Bosnia-Herzegovina* notices that dozens of anonymous ("wild") portals have appeared in the months before 2018 General elections, with a clear purpose to propagate the agenda of major political parties and attack their political opponents. She added that particularly troublesome was the fact that official agencies used them as sources in their reporting.

One of its consequences pointed out is a specific “brain drain” in the profession, leaving the professional media understaffed and/or staffed with untrained and uneducated journalists.¹⁰⁶

When discussing consequences of political disinformation, the interviewees emphasize the detrimental effect they have on democratic processes, some describing them as the main factor which is hampering development of democracy in BiH:

“The peoples in BiH have been bombarded with disinformation for the past 20 years, that’s why democracy still hasn’t taken on in BiH. People are closed, unwilling to participate in social and political life, to organize, to question anything; there’s no participation, the youth is disillusioned and apathetic.” (Vuk Vučetić, University of East Sarajevo, Department of Journalism). Insufficient and/or factually incorrect information provided to voters is among the most mentioned harmful effects on democracy, second only to the perpetual instigation of ethnic tensions and ethnic hatred, noted by large majority of the interviewees.¹⁰⁷ Helena Mandić (CRA) particularly emphasizes the role of disinformation as a primary tool of keeping the ethnic tensions high: “Disinformation in BiH are particularly damaging considering lack of democratic consciousness, relatively low level of education, the legacy of war which has moved from battle field into what was previously known as “special warfare”. It is now waged primarily through the media, but not through classic hate speech: it’s rather through distorting reality which deepens political crisis and ethnic tensions”.

Nearly all interviewees point to the negative effects of online sphere, particularly social media, when it comes to proliferation of disinformation in the country. Social networks mentioned by most as a factor which exacerbates spreading of disinformation because of the new habits they developed in consumers of media information, but also as a tool used both by commercial and political “disinformers”.

There is, however, a noticeable discrepancy between the overall awareness of the problem of disinformation and/or lack of professionalism which leads to publishing bad content and self-awareness when it comes to day-to-day practices of journalists and editors themselves. Among the interviewed stakeholders, only one (a journalist of TVSA) has noticed that everyday practice does lead to errors in reporting.¹⁰⁸ Others who had discussed the practices of their own media outlets mostly present them as highly professional and not prone to publishing misinformation, while at the same time pointing out bad practices in other media.

The communication of Raskrinkavanje with website owners, editors and journalists of online and offline media outlets and agencies points to similar lack of accountability in the media. Unwillingness to abide to professional standards, appears either because of lack of knowledge of what these standards are, or because of clear intent to publish disinformation.¹⁰⁹

When faced with the fact that their media outlet has published inaccurate information, website owners, journalists and editors, if they decide not to ignore our requests for comments, would respond in one of the following ways:

¹⁰⁶ **Sandra Kovačević**, *Ministry of Transport and Communications of Republic of Srpska*: “Because of the low wages, professional journalists are forced to move to other professions and newsrooms are then populated with untrained and uneducated staff, which is not familiar with ethical codes of the profession.”; **Vuk Vučetić**: “Most of the professional, skilled editors and journalists went to work for international media which have their outlets in BiH. Their places in local media have been filled by “compliant instead of competent” staff, either unwilling or unable to resist political pressures”.

¹⁰⁷ **Katarina Panić**, *journalist, Srna* -The media “create an image of the enemy in order to homogenize certain group”); “Ethnic tensions and biased reporting about war related topics is a common content of misleading reporting” (Amela Delić, University of Tuzla, Department of Journalism).

¹⁰⁸ **Jasmin Begić**, *journalist, TV Sarajevo*: “I’d lie if I said that I haven’t had experience with disinformation, i.e. publishing content I haven’t verified because of the speed (of publishing). In these cases, my media outlet publishes a retraction, which should be the practice in all the media in my opinion.”

¹⁰⁹For example, most of the media from the “large disinformation hub” are usually non-responsive and rarely answer any questions about the political disinformation they publish, or issue corrections after the factual inaccuracies are pointed out.

Acknowledge the misinformation and take accountability

Acknowledge the unintentional mistake and correct the false information (publish a correction).

Acknowledge the misinformation and deny accountability

Delete the inaccurate/misleading content without feedback or explanation.

Because information was "taken" from another media outlet, it's their responsibility to correct it (disregard of own responsibility to check and verify information before publishing).

Many think that citing the source is enough to be absolved of responsibility for accuracy of information (especially citing "social media" as sources).

Justify their mishaps with the number of news they publish every day (there's no time to check every information).

Deny the misinformation

Stand by the editorial decision to publish the inaccurate/misleading content, giving different reasons:

- defend the choice to publish unverified information (essentially hearsay) claiming that this is an accepted practice among all the media (lack of knowledge about professional use of sources, including anonymous sources);
- ideological reasons pointing to lack of professionalism (not distinguishing between news and opinion pieces, fundamental misunderstanding of the role of media);
- ideological reasons pointing to clear intention to misinform the public as service to some "cause" (treating their ideological or political convictions as a legitimate motive to publish inaccurate, incomplete or misleading information).¹¹⁰

Acknowledge the misinformation and deny accountability

Delete the inaccurate/misleading content without feedback or explanation

Because information was "taken" from another media outlet, it's their responsibility to correct it (disregard of own responsibility to check and verify information before publishing)

Many think that citing the source is enough to be absolved of responsibility for accuracy of information (especially citing "social media" as sources)

Justify their mishaps with the number of news they publish every day (there's no time to check every information)

¹¹⁰ Zulejhić, Emir. "Koji mediji lažu o Siriji." *Raskrinkavanje*. May 29, 2018. <http://bit.ly/2IOXeNB>

Deny any accountability and display an overtly hostile attitude

Responses which indicate lack of accountability to the public and to the readers' right to accurate and professional reporting:

- asking for "credentials" which give the fact checkers the "right" to ask the media for their sources of information, or for a comment on why an incorrect information was published
- asking if there's a law which obliges them to answer the questions (implying that they are only accountable to the law and/or not interested in discussing/correcting their practices unless legally obliged);
- accusations of trying to "police" them using "repressive measures", or interpret fact checking as an attempt to limit free speech;
- accusations that the inquiring fact checkers are working "for someone", disregarding public interest as a category;
- replying in an aggressive (sometimes openly offensive) way, including requests from anonymous portals to take down the information about website ownership (WHOIS data) from Raskrinkavanje website; some in an openly threatening manner;
- ones with clearly recognizable political agenda would point to other media and/or specific news they consider to be "fake news" and ask that those are debunked instead of their own disinformation.

Raskrinkavanje sometimes publishes these responses verbatim, both to provide full information to the readers and to point to the lack of accountability and other bad practices which contribute to, or are a symptom of, omnipresence of disinformation, particularly in the online media sphere. A good illustration of several of the phenomena described above can be found in responses sent by website Poskok in a series of unsigned emails, containing everything from accusations of political instrumentalizations, intentions of "policing the media", to demonstrable lack of knowledge about the basic postulates of professional journalism.¹¹¹

¹¹¹ Cvjetičanin, Tijana. "'Poskokovo' istraživačko novinarstvo." *Raskrinkavanje*. April 29, 2018. <http://bit.ly/2UpknrC>

4.2. SELF-REGULATORY FRAMEWORK

Press and Online Media Code of BiH includes the article on accurate and fair reporting, which spells out:

“Journalists shall not publish inaccurate or misleading material in the form of pictures, texts or other materials. Pictures and documents must not be falsified and/or used in a misleading manner. Journalists shall not conceal and/or withhold any essential information, the disclosure of which would materially affect the interpretation of a report published and the general readers' understanding. Journalists have the professional obligation to promptly correct any published information that is found to be inaccurate. The apology and/or correction shall be published with due emphasis. Journalists shall always report truthfully and accurately about the outcome of an action undertaken as a result of defamation they were involved in. The journalist shall report only on the basis of facts, the origin of which is known to the journalists.

In reporting and commenting controversy, journalists shall make an effort to hear and represent all sides in a conflict. If one side in a controversy refuses to make itself available to the journalist, the publication may legitimately note this refusal in its reporting.”
(Article 5)¹¹²

In addition, the truthful reporting is subject matter of other articles, mostly Article 1, Public Interest, where it is defined as “the procedure and/or information which has the intention of helping the public create personal opinions and decisions (...) including the efforts (...) to prevent the seduction of the public by certain statements or actions of individuals or organizations”.

The members of Press Council are media from both entities and different regions in the country, which speaks of the fact that PC has managed to largely overcome the entity and other administrative divides over the past years. While these norms are in line with global journalistic standards, the reach of the self-regulatory system is limited only to content observed and reported to PC by the benevolent citizens. Furthermore, Press Council only deals with content of the platforms that they consider mass news media, but not with platforms that fall beyond this category, nor with the content of the social networks or blogs which is similar to the bodies that operate in Western European countries. However, the possibility of moderation of social media content is increasingly discussed, and some sort of self-regulation in this area is generally more preferred option for the experts' community, as the one being least restrictive towards media freedoms¹¹³ (see more below).

On the global level, there have been some initiatives to establish self-regulatory framework for social networks, example of which is related to regulation of hate speech under 2017 Network Enforcement Act (NetzDG) in Germany¹¹⁴.

¹¹² The text of the English version of the Code, available at: <http://bit.ly/2EfKj20>.

¹¹³ Article 19. “Self-regulation and ‘hate speech’ on social media platforms.” 2018. <http://bit.ly/2SvjhbT>.

¹¹⁴ “Network Enforcement Act.” September 2017. <http://bit.ly/2Ef1AYZ>.

The Act stipulates a fine of up to 50 million EUR for social networks that do not remove “clearly illegal” content within 24 hours of a complaint (or a week when it is not clear that the content is illegal). The NetzDG also envisages the existence of “regulated self-regulatory agencies”, which would be financed by social media companies, and role of which would be to determine whether particular content is in violation of the law and should be removed. These agencies are to be recognized by the Ministry of Justice under conditions, among others, of demonstrated independence and expertise of the persons that would make the decisions.

When it comes to the effects of self-regulation, there are also stark differences in opinion among the stakeholders, perhaps more than in any other issue discussed in the interviews. We can, again, divide them into two broader “camps”: those who think that self-regulation is powerless to stop or prevent publishing of disinformation because of the current set up of the online media scene in particular, and those who think that it already has satisfactory results¹¹⁵ and/or that it can be further improved either by improving the work of PC itself¹¹⁶, or by introducing new models and mechanisms of self-regulation.

The interviewees who express skepticism at any significant influence of self-regulation point to the fact that the key component for self-regulation to work is the willingness of the media to be recognized as professional and trustworthy, which is lacking in many cases. The media which break the ethic codes intentionally are not interested in respecting PC recommendations, as lowering the standards of the profession is their business model and they have no interest in abandoning it.¹¹⁷ Apart from direct economic gain (from advertisements and “clickbaits”), some interviewees also pointed to the fact that the media market is underdeveloped, pushing the media to economically depended on their political sponsors, which hampers their professional development, including the awareness of the significance of self-regulation.¹¹⁸

Among the models to improve self-regulation, Ljiljana Zurovac from the Press Council points to “co-regulation” as the best solution, where the basic self-regulatory model would be kept, with additional ability introduced to sanction the most severe breaches of ethical standards of the profession by the self-regulatory body. Some of the interviewees are of the opinion that self-regulation of online media should either be replaced by legal mechanism (laws and regulations),¹¹⁹ or combined with them to produce any significant effect when it comes to fighting disinformation. This is often mentioned when it comes to social networks, seen by all as the most unregulated and most damaging part of the online

¹¹⁵ **Dejan Jazvić**, *chief editor of FENA*: “Considering that PC code of conduct is voluntary, the results are satisfactory in terms of how much the media comply with their decisions”.

¹¹⁶ For example, **Berislav Jurić**, *Editor of Bljesak*, considers that PC is doing “good work but is too soft on the media which are the members of the Council”.

¹¹⁷ **Lejla Turčilo**, *University of Sarajevo*: “There’s no longer any honor in the media profession, so self-regulation can’t have any significant effect. Publishing misleading and low quality content is not accidental, its modus operandi and those who do it will not abandon it as long as they can use it for financial or other gains.”

¹¹⁸ **Emir Habul**, *Editor and journalist, BHRT*: “Self-regulation requires that the awareness of media community rises to the level where it will be resolving its own issues. However, we can see that that hasn’t happened (...) partially due to the political divide, but also because they are not developed enough to be economically independent and to abide by professional credo”.

¹¹⁹ **Amil Dučić**, *editor at Klix*, thinks that regulatory framework is missing a body which would be authorized to sanction portals or print press for publishing disinformation, as currently only libel laws provide any legal mechanism in that respect (but only for individuals targeted by disinformation and even for them it includes long court trials). Mehmed Halilović, a lawyer and a media expert, also points out that libel laws only work on individual level and did have some effect in making the media more cautious after paying fines for publishing disinformation about individual persons; however, they are not a tool which can be broadly used in fighting against disinformation

This is often mentioned when it comes to social networks, seen by all as the most unregulated and most damaging part of the online sphere, where freedom of speech is abused.¹²⁰ There is also a dose of skepticism as to even that would bring satisfactory results,¹²¹ especially when it comes to social networks, where some interviewees note that any local regulation is powerless until the companies which run these networks decide to self-regulate.

4.3. OTHER ISSUES RELATED TO DISINFORMATION

4.3.1. TRANSPARENCY OF MEDIA OUTLETS IN BIH

Transparency of media businesses, including the transparency of ownership, identification of persons responsible for the media content, and transparency of their patterns of funding is limited. Some of the reasons derive from the lack of regulation in this area.

Primarily, the transparency of the ownership is only partly ensured through the court registration of media outlets, like any other businesses. The data on business owners can be accessed through direct requests to the nine municipal courts in FBiH and five district courts in Republika Srpska. However, the data on the ownership is only in part available online, through the website Pravosuđe.¹²² It is up to the courts to publish and update such information, and so far the register does not include information from courts based in Republika Srpska, while there have been indications that some data from Federation of BiH on certain media outlets are missing from the register¹²³. Some data on business entities in RS are available in the registers of Intermediary Agency for IT and financial services ad Banja Luka (APIF)¹²⁴, while data on ownership is available only per fee.

Furthermore, the ownership information for the media that are registered as foundations and associations, are collected by the Ministry of justice FBiH¹²⁵ or the authorities of the Canton where the association is based (in FBiH), or at the Ministry of Governance and Local Governance in RS. These data are generally available on request, which is guaranteed by the freedom of access to information acts (or FOIA, including two laws on entity and one on the state level). But, while such information from court and other registries are mostly public, collection of data on media ownership requires access to multitude of public registries and the copies of the registration documents are available only per a certain fee. Secondary sources suggest that in 2014 this fee was around BAM10.00 per page in courts in FBiH, or BAM10.00 per company in RS.

It can be argued that this is contrary to stipulations that copies should be free of charge for first then pages in RS (Article 16 of the Freedom of Access to Information Act of Republika Srpska, Official Gazette 20/01).

¹²⁰ Emir Habul, for examples, thinks that a new law is needed, as no self regulation will help when it comes to online portals and social networks: "It's out of control, chaos. Freedom must be limited by the rights of others. I can't be free to slander you and you don't have the right to defend yourself"

¹²¹ Amela Delić, *University of Tuzla, Department of Journalism*: "I don't think that freedom to spread lies, hate speech and disinformation should be presented as freedom of expression. However, I don't think that online media will be regulated in the future"

¹²² <http://bit.ly/2ExbOEm>

¹²³ Petković Brankica, Sandra Bašić Hrvatinić and Sanela Hodžić. "Značaj medijskog integriteta: Vraćanje novinarstva u službu javnosti." *Mediacentar*. Sarajevo. 2014. <http://bit.ly/2NvuWXg>.

¹²⁴ Available at <http://bit.ly/2C4KtJ8>

¹²⁵ Reregister available at <http://bit.ly/2VDjDil>

¹²⁶ Ibid. 95. Data for RS are available at the agency APIF.

In FBiH the guidelines for expenses for copies are to be provided by the Ministry of Justice (Article 16 of the Freedom of Access to Information Act of Federation of BiH, Official Gazette 32/01 and 48/11).

More importantly, these registries do not provide information on indirect ownership and final beneficiaries of businesses, which further complicates a search for actors that are involved in media functioning. In BiH there are no legal requirements for disclosure of information on indirect ownership and final beneficiaries of media businesses, nor is the excessive concentration of media ownership regulated in any way. Therefore, indirect ownership enables possible influences on media content hidden not only from the public eye, but from the relevant authorities as well.

Communications Regulatory Agency (CRA) does pose an obligation on broadcasters to assure "simple, direct and constant access to at least following information a) name of the licensee b) address where the licensee is founded or based, c) detailed information on the licensee, including the e-mail address or website, and d) information that it was licensed by the Agency" (Article 18, Rule 77/2015). However, the broadcasters are not obliged to publish information on their ownership or sources of funding. CRA itself, on the other hand, publishes data on the editors, addresses and contact information of TV and radio stations, and it intended on publishing information on the owners. By the beginning of 2017 CRA collected information on ownership – including indirect ownership, but the Personal Data Protection Agency has made its publishing impossible by issuing an opinion that the names of owners and shares of media ownership are to be treated as personal data and therefore should not be published.

The Agency holds the opinion that publishing such information would be illegitimate given that the legislation does not clearly recognize ownership transparency as public interest and that publishing of these data would fall out of the scope of CRA authorities, defined in the Law on Communications.¹²⁷

Contrary to broadcasting media, print and online media do not have any legislative or regulatory obligation to publish information on their registration or their contact information, let alone about their owners. Press Council of BiH publishes information such as the name of editor-in-chief and contact information, but not the information on ownership over print and online media. Many of online platforms in addition are not registered as media business in the court registries, and do not publish information on their ownership, nor are they within the reach of self-regulatory system managed by the Press Council. PC does invite print and online media to publish their impressum (i.e. information on editors, journalists, contact information, etc.), but many of the media outlets ignore such requests. In these circumstances there are no obstacles for existence of clandestine platforms that use disinformation in the service of particular party agenda, while protecting the persons who operate them from any ethical accountability.

¹²⁷ Jukić, Elvira M. "Registar medija kao važan doprinos transparentnosti medijskog vlasništva u BiH." *Mediacentar*. 2018. <http://bit.ly/2Xv7l86>.

The issue of ownership transparency, or lack thereof, is also addressed by majority of interviewed stakeholders, most of whom agree that it has to be tackled by adopting new regulations or amending the existing framework.

Lack of transparency of **funding** of media is also recognized as a factor that goes in favor of possible hidden influences on media in BiH. Even the funding that comes from the public sector lacks clear criteria for allocation and its transparency is limited, although it amounts to more than 30 million BAM per year.¹²⁸ The duties of local government towards public media are in general terms defined by the relevant laws. But despite the fact that for example the **Law on Principles of Local Self-Governance in the FBiH**, specifies that local government has authorities for "ensuring proper work conditions for local radio and TV stations" (Article 8)¹²⁹, there have been cases of conditioning and delays in providing the funding for public media due to political disagreements between the local government and the leading persons within the media¹³⁰. Public sector also provides funding for both private and public media for particular purposes, including grants meant to support the sustainability of media or specific media projects, for media reporting on the work of local government, etc.

They also allocate funds for commercial purposes, such as advertising, public calls or notifications on public procurement. Such information are even more difficult to obtain and to monitor.¹³¹ Under such circumstances, this public funding can easily become an instrument of considerable influence, i.e. of rewarding political affiliates and favorable media reporting. In an impoverished BH media market, with limited alternative sources of funding¹³², the public funding is becoming more relevant for sustainability of multitude of media outlets.

Issue of transparency of funding is furthermore addressed in the EU accession process, with for example Guidelines for EU Support to Media Freedoms and Media integrity in Accession Countries 2014–2020¹³³ promoting transparency, including existence of accessible database on media owners (and final beneficiaries), legal measures against monopolies and dominant market positions which are consistently applied and made know to the public, as well as transparent privatization of public media based on equal market completion. In BiH, none of these indicators is currently in place.

Anti-Corruption Strategy and Action Plan for Implementation of the Anti-Corruption Strategy 2015– 2019¹³⁴ recognizes the need to increase transparency of media ownership and funding (Activities 4.1.2. and 4.1.4.), but no concrete measures have been taken so far, either to enhance transparency of media ownership and funding in general, or public funding in particular.

¹²⁸ Hodžić, Sanela and Anida Sokol. "Transparent and legitimate media financing from public budgets: guidelines for public bodies." Mediacentar. 2018. <http://bit.ly/2VhM7hM>. 9.

¹²⁹ The title of the Law and the quote is taken from an unofficial translation of the document at the website of the Association of Municipalities and Cities of the FBiH; "Official Gazette of FBiH 49/06 and 51/09." <http://bit.ly/2NI4QAx>.

¹³⁰ Purić, Amir. "Na rubu egzistencije: slabo marketinško tržište i politički pritisci." *Javni lokalni mediji između javnog interesa i finansijske ovisnosti*. Mediacentar. 2018. <http://bit.ly/2GZoMyb>. 26.

¹³¹ Hodžić, Sanela and Anida Sokol. "Oglašavanje i drugi komercijalni odnosi između javnog sektora i medija: smjernice za javne organe u BiH." Mediacentar. 2018. <http://bit.ly/2tOfqYL>.

¹³² More on the weakening of advertising; IREX. "Media Sustainability Index." *Annual Scores for Bosnia and Herzegovina 2018*. <http://bit.ly/2VBS3T2>. 4, 8, 9.

¹³³ European Commission. "Guidelines for EU support to media freedom and media integrity in Enlargement countries, 2014–2020." *DG Enlargement*. February 2014.

¹³⁴ Document in local language available; <http://bit.ly/2SEKJnG>.

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The main obstacle in carrying out these actions is that the institutions and organizations that were identified as responsible – Communications Regulatory Agency, inspectorates, public broadcasting services, courts and journalists' associations – do not have the authority and/or capacity to fulfill this task¹³⁵.

¹³⁵ Agency for the Prevention of Corruption and Coordination of the Fight against Corruption. "Prvi izvještaj monitoringa provođenja Strategije za borbu protiv korupcije 2015–2019. i Akcionog plana za provođenje strategije za borbu protiv korupcije 2015–2019." APIK. 2016.

4.3.2. DEFAMATION

Misinformation can also involve defamation i.e. it can inflict damage to private or legal person. For more than a decade, defamation in BiH has been regulated under civil law, and the defamation law is generally considered well defined, providing a proper balance between the freedom of expression and freedom of media on one side, and the accountability of media on the other (Libel law FBiH, RS and BD). Some difficulties are related in particular to the lack of standards for establishing the amount of compensation for the damage to the reputation and emotional distress caused by defamation. In addition, the overall high number of the libel cases – as many as 300 per year¹³⁶ – is posing considerable burden on many media and thus can discourage journalistic critique. Some sources suggest that defamation lawsuits have been often misused for exerting pressures on media¹³⁷.

4.3.3. ADVERTISING AND POLITICAL ADVERTISING

Public sector in BiH spends considerable funds for advertising. The information is not proactively published and not easily available. Some sources show that the government spending for advertising has ranged between half a million and several millions KM per year.¹³⁸ In addition, public companies allocate considerable amounts for advertising – in particular telecom operators – amounting to several to dozen millions.¹³⁹

Law on Public Procurement in BiH,¹⁴⁰ adopted in 2014, has set relevant rules for public procurement, but the transparency of the procurement procedures and contracts as well as the precise establishing of criteria and evaluation of bidders are still very limited.¹⁴¹

Although the website of public procurement since 2018 enables publishing of plans of public procurement, this is not still obligatory for public bodies. Therefore the plans on procurement are not regularly published.¹⁴²

¹³⁶ The Institution of Human Rights Ombudsman BiH. "Special Report on the Status and Cases of Threats to Journalists in Bosnia and Herzegovina." 2017. <http://bit.ly/2UINADB>. 43.

¹³⁷ Halilović, Mehmed. "Tužbe za klevetu - sredstvo pritisaka na medije." January 12, 2018. <http://bit.ly/2SFsCOL>.

¹³⁸ The data are partial because in some cases they include only those published on the public procurement website, and some do not include data on public institutions that failed to respond to requests to information; Hodžić and Sokol. "Oglašavanje i drugi komercijalni odnosi između javnog sektora i medija." Mediacentar. 2018. <http://bit.ly/2SFsDBT>, p. 11; Mujkić, Semir. "Kratko uputstvo: Gdje se oglašavaju institucije i javne kompanije?" *MC Online*, November 19, 2017. <http://bit.ly/2EC2LBS>; MC Online. "Institucije u BiH finansiraju medije sa desetinama miliona maraka godišnje." August 17, 2016. <http://bit.ly/2Tf93Sk>.

¹³⁹ CRMA. "Pogledajte TV film: Kako se finansiraju javni mediji u BiH." *Žurnal.info*. 2018. <http://bit.ly/2NHF1AC>.

¹⁴⁰ Official Gazette BiH 39/14. <http://bit.ly/2UfYhaK>.

¹⁴¹ Hodžić and Sokol 2018. "Oglašavanje i drugi komercijalni odnosi između javnog sektora i medija." 14; Pejaković, Stanka. "Objavlivanjem ugovora do transparentnijih javnih nabava u Bosni i Hercegovini." *Analitika*. Sarajevo. 2016. <http://bit.ly/2HgeitJ>

¹⁴² Voloder, Nermina. "Transparentnost javnih nabavki u Bosni i Hercegovini. Između teorije i prakse." *Analitika*. Sarajevo 2016. <http://bit.ly/2SIXLjO>.

Most of the public procurement contracts obligate a public body to publish a call on website of public procurement, which includes the subjects of procurement, financial data and information on the procedure. However, there is no such obligation for direct agreements, and also negotiation procedure is possible without publishing of these data (although in the latter case there is an obligation to publish the data on the website of the public body in question).¹⁴³ Secondary sources suggest that although negotiation procedure is widely used, at least in some cases it was judged as unjustified.¹⁴⁴ Similarly, obligation to publish information on contracting of bidders does not apply to concurrency procedure or direct agreements,¹⁴⁵ although the Procurement Agency has started to publish them in 2017.

The transparency of the advertising practices of public companies is particularly limited, given that for example telecommunication companies in BiH are exempted from the procurement regulation. In addition, these companies are not obliged to disclose information on marketing, as it falls under the category of business secret, under the Law on Public Enterprises of the Federation of BiH (Article 4).¹⁴⁶

In BiH there is in addition no regulation about what constitutes a legitimate content of political advertising. A few advertising campaigns by public bodies have however been judged as a blatant promotion of political parties, associating with its symbols, glorifying the successes of the government and featuring political leaders.¹⁴⁷

Therefore, there is a need to regulate advertising and other financial relations between public sector and media, in order to assure establishing precise and legitimate public-interest criteria for each decision on media funding, and to assure that the entire procedure is transparent.

¹⁴³ Law on Public Procurement, Article 17.

¹⁴⁴ Voloder, Nermina, 2015.

¹⁴⁵ Pejaković 2016. supra note 22. 19-20.

¹⁴⁶ The title and the text of the law taken from the English version of the document available on a website of a lawyer office; Official gazette FBiH 8/05, 81/08 and 22/09. <http://bit.ly/2H1GXn3>.

¹⁴⁷ Some examples are mentioned in Hodžić, Sanela. "Increasingly dependent and disciplined media." <http://bit.ly/2Ukrd1x>. 23.

4.3.4. SOCIAL MEDIA

So far there has been a considerable clandestineness about the nature and purpose, credibility and origin of much of the content produced and distributed on social media. Therefore the extent and manner in which the communication rights of citizens, i.e. rights to be properly informed about the issues of public interest are exercised have been profoundly affected. While social media and other intermediaries now have indispensable and a positive role in the flow of information and ideas, content circulated also can involve hidden agenda, misinformation and disinformation. The content shared on these platforms informs public opinion and the citizen engagement and thus influences socio-political developments.

The possibilities of monitoring content on social networks concerning issues such as hate speech, as well as possibilities of improving the overall transparency of the sources of circulated content have been increasingly discussed on the global level.

When it comes to state regulation over online content, In the revisions of the Audiovisual media directive (AVMSD) from November 2018, the EU member states are instructed to extend the authorities of media regulators to video-sharing platforms and social media used for sharing video content, but only on matters concerning hate speech and terrorist content and protection of minors from harmful content.¹⁴⁸ Even these changes were criticized for example by Article 19, which claimed that they are too restrictive and incompatible with standards of freedom of expression.¹⁴⁹

There are some recent initiatives, however, which focus on disinformation. The most relevant is the Code of Practice on Disinformation, jointly adopted by the European Commission and signed by Google, Facebook and Twitter, aimed to minimize the influence of fake news.¹⁵⁰ With this code, the social media companies commit to increasing transparency of political advertising (through for example disclosing identity of sponsors and amounts spent, and efforts to clearly distinguish between advertising and editorial content), reducing of revenues of purveyors of disinformation (for example by disrupting advertising on platforms that misrepresent material information about themselves or the purpose of their properties), by closing the false accounts and informing their consumers about the issues related to transparency. The companies also commit to invest in technological means to prioritize relevant, authentic, and authoritative information where appropriate in search, feeds, or other automatically ranked distribution channels.

¹⁴⁸ European Commission. "Directive (EU) 2018/1808 of the European Parliament and of the Council." *Official Journal of the European Union*. November 2018. <http://bit.ly/2tRDHSy>.

¹⁴⁹ European Commission. "Directive (EU) 2018/1808." Preamble (19).

¹⁵⁰ European Commission. "Code of Practice on Disinformation." September 2018. <http://bit.ly/2C1tQOs>; Article 19. "Self-regulation and 'hate speech' on social media platforms." 2018. <http://bit.ly/2VvutHk>.

While the Code is not legally binding for the signees, they do commit to regularly report on its implementation, agree on their reports to be subjected to independent evaluation, and on extensive cooperation with the European Commission in collecting the data and analyzing related issues.

Steps towards greater transparency of political advertising were made by Facebook and Instagram Facebook Ad archive. The archive is for now only available for United States, United Kingdom and Brazil.¹⁵¹ The archive is, however, not complete, nor does it provide all relevant data. For example, the advertising from Brazil will appear in the archive only if the advertisers themselves declare that their ad relates to politics or issues of national importance. Furthermore, the archive lists the organizations, but does not provide information about who is behind those organizations.

When it comes to policies of social media companies about removing user content, they are stipulated in the company Terms of services. While some of their norms are supportive of fundamental human rights, some of the decisions, possibly made under pressures of particular states, have been criticized for violation of standards of freedom of expression¹⁵². Given that these practices imply a lack of legal certainty, lack of respect for due process of law, and lack of transparency and accountability of these platforms (allowing possible biases and political influences), they cannot be considered as a remedy against false and problematic online communication.

In BiH there are no initiatives related to content on social media, blogs and other non-journalistic platforms, be it related to the practices of the companies themselves, regulation by the state agencies extending to online content, or setting up self-regulation system for content of social media. In the neighboring countries there have been some discussions on the issue. Most of all, organization *Gong* from Croatia has been advocating for transparency of political advertising on websites and social networks, including advertising that is commissioned outside of Croatia¹⁵³.

¹⁵¹ More on Ad archive. Facebook. <http://bit.ly/2C4KZa2>.

¹⁵² Article 19. "Self-regulation and 'hate speech'" 15.

¹⁵³ More in the article of *Gong* available at: <http://bit.ly/2Cfl9jV>.

4.3.5. MEDIA AND INFORMATION LITERACY

Media and information literacy is underrepresented in the education curricula in BiH.¹⁵⁴ While the state strategies have been mentioning some of the related concepts, the specific initiatives of state bodies aimed at promoting MIL have been only few. The CRA has been engaged mostly on commissioning research, adopting rules and developing guidelines for protecting minors and consumers from potentially harmful broadcasting content¹⁵⁵. Other institutions remain mostly inactive, but for example Ministry of Communication and Transport of Republika Srpska (RS) is currently engaged in a project of raising awareness on potentially harmful online content and self-regulation in 2018–2019, while Ministry of Civil Affairs of BiH has announced development of state strategy for MIL development.¹⁵⁶

Civil sector on the other hand has been more active in MIL projects, mainly fostering critical thinking and media production skills. Some of the examples are the Media literacy workshops for students of social sciences in 2017 and 2018, led by OSCE, or workshop for teachers on protection of children against abuse through ICT platforms, organized by EMS Emmaus since 2010. There have also been a number of research publications of civil society organizations such as *Internews* in BiH, *Mediacentar Sarajevo*, *Friedrich-Ebert-Stiftung*, *Heinrich Böll Foundation*, as well as events organized by *Zašto ne*, *Mostar Center for Critical Thinking* and others, which partly or entirely focused on MIL, which demonstrate considerable awareness about the needs for improvement of MIL in BiH. The watchdog and fact checking platforms such as *Analiziraj* and *Raskrinkavanje*, also include raising the awareness of the audience on media practices and problematic reporting, and thus contribute to MIL in BiH. However, as some of the interviewed stakeholders notice, most of these activities are fragmented and a coordinated approach to strengthening media literacy is lacking in both the governmental and the civil sector.¹⁵⁷

Current system of regulation of broadcasting content and self-regulation of online and print media content in Bosnia and Herzegovina entails safeguards against false information. The contribution of regulation and self-regulation to fight against fake news and to the promotion of journalistic ethics in general is indispensable, but limited to broadcasting media and those online and print media that cooperate with Press Council in joint efforts to implement professional norms. Given that some of online media outlets are not even registered as businesses, lack of information about the persons behind these media incapacitate self-regulatory authorities to even try to intervene and to ask for removal of false information.

¹⁵⁴ Tajić, Lea. "Medijska pismenost u Bosni i Hercegovini." 58-59. Dedić Bukvić, Emina. "Zastupljenost informacijske i informatičke kompetencije na studijskim programima izobrazbe nastavnika na Univerzitetu u Sarajevu." *Časopis za obrazovanje odraslih i kulturu*. Issue 2. 2016. <http://bit.ly/2XzCi0y>. 73-96.

¹⁵⁵ CRA. <http://bit.ly/2TvYUzQ>.

¹⁵⁶ More in: Hodžić, Sanela. Media and Information Literacy in Bosnia and Herzegovina: Numerous Civil Society Initiatives and Lack of Public Policies. in Petković, Brankica (ed.) *Media and Information Literacy in the Western Balkans: Unrealized Emancipatory Potential*. Mediacentar Sarajevo 2019.

¹⁵⁷ Lejla Turčilo, *University of Sarajevo*: "Media literacy as an activity undertaken by numerous NGOs can be one of the mechanisms to fight disinformation, but unfortunately there we also see a lot of doubling and overlapping of activities and fragmented, rather than coordinated work of actors from both the governmental and nongovernmental sector."

At the same time, not sufficient information about ownership and funding of media business are made easily available, and under these circumstances it is more difficult for the public to make informed judgment about credibility of media content. There is also a systemic problem of lack of media and information literacy education, which would capacitate the citizens to better recognize and understand false information and other problematic content.

Increasing challenges come in particular with the changing nature of how the information are produced and disseminated through online platforms. Platforms that are not monitored in any way, mainly content shared on social media, increasingly influence the perception, choices and engagement of citizens. Similarly, blogs and websites other than print and online media outlets are not exposed to any systematic scrutiny. In practice, while fake news disseminated through TV and radio programs can be penalized under the relevant CRA regulation, the same information can be distributed through online platforms (websites and social networks) of these media or other actors with impunity.

In recent years, different states have been pressuring social networks to remove what was considered problematic content, but the practices have been inconsistent and sometimes in violation of freedom of expression. Some states have decided to move in the direction of penalizing social networks for hosting problematic content. The Network Enforcement Act in Germany is a precedent in this regard and stipulates penalization of social network that do not remove content that is judged to be violating the national laws. However, the experts judge these trends as worrying and possibly restrictive to freedom of expression¹⁵⁸.

Proffered future line of actions go in favor of assuring efficient and independently-led self-regulation¹⁵⁹, thus putting a fight against fake news without cracking on freedom of expression.

¹⁵⁸ Oltermann, Philip. "Tough new German law puts tech firms and free speech in spotlight." *Guardian* January 5, 2018. <http://bit.ly/2TueRX9>.

¹⁵⁹ For recommendations on self-regulation of hate speech in social media see more in *Article 19*, 2018, supra note 31.

RESEARCH METHODOLOGY

1. Methodology of *Raskrinkavanje*¹⁶⁰

Raskrinkavanje is a fact-checking platform which traces, analyzes and rates disinformation as it appears in the media and social media, using a distinct methodology developed in cooperation with Crime and Corruption Reporting Network (KRIK) from Serbia.¹⁶¹ The main pillar of the methodology are the ratings used to identify different types of false or misleading media content. The rating system was based on 10 types of misleading news as defined by EAVI (European Association for Viewers Interests)¹⁶² which were further refined by *Zašto ne* and *Krik* and adjusted to local context and media practices. The result was 15 ratings used by *Raskrinkavanje*, out of which 12 are negative ratings (12 types of media manipulations), two are neutral and indicate satirical content or unintentional errors in reporting, and one is used to note that a correction of inaccurate information has been issued by the media which published it.

This is the full list of ratings with brief explanations of the types of content they refer to:

- **Fake news:** Intentional fabrication of factually incorrect information
- **Redistributing fake news:** Redistributing of fake news published by other media outlet
- **Spin:** Intentional attempt to steer public attention from a current relevant event or information
- **Disinformation**¹⁶³ False or selective presentation of existing information
- **Manipulation of facts:** Misleading interpretation of factually correct information
- **Pseudoscience:** Presenting non-scientific or pseudoscientific claims as scientific facts
- **Conspiracy theory:** Explicit or implicit claim of the existence of a hidden malevolent plan, without presenting evidence for it
- **Biased reporting:** News coverage which advocates or openly favors one side in a dispute or a controversy; and/or portrays another side in a negative light without providing its perspective

¹⁶⁰ <http://bit.ly/306nHuM>

¹⁶¹ <http://bit.ly/2HbHO3b>

The same methodology is used by *Krik*'s fact checking project of a similar name, *Raskrikavanje* (raskrikavanje.rs)

¹⁶² <http://bit.ly/2E1qcFn>

¹⁶³ When it appears in context of ratings used on *Raskrinkavanje*, this term refers only to the rating as here defined. The terms "political disinformation" and "disinformation" which appear otherwise in this report, are used in a general context as defined in the introduction (See: *Disinformation: Global context and implications*).

The case of BiH

- **Censorship:** Relevant information intentionally unreported or removed after being published
- **Clickbait:** Misleading and/or exaggerated media headlines or social media shares
- **Hidden advertisement:** Promotional material presented as news
- **Unverifiable:** Claims that can't be verified, mainly due lack of cited or verifiable sources
- **Satire:** Clearly declared satirical content which has the potential of being mistaken as genuine news, requiring clarification in such cases
- **Error:** Incorrect information published as a result of an unintentional mistake
- **Corrected:** Correction of previously published incorrect information

These categories are used for the purpose of rating the analyzed material on the basis of facts established by the fact checking process. The ratings are given to each individual claim where facts are distorted or misinterpreted in the analyzed article; or to the article as a whole, in cases where only one type of manipulation is detected. This is why one article can have one or more ratings, depending on the type and presence of misleading content it contains.

The guidelines for selection of articles to be analyzed on *Raskrinkavanje* are established by its methodology. Two main criteria for the selection of articles for debunking, other than the suspicion that they are using at least one type of media manipulation identified by *Raskrinkavanje's* methodology, are that it is covering a topic related to BiH, or that it was published by a media based in BiH or with significant audience in BiH. Readers' inputs have played an unexpectedly significant role in this process. The articles "reported" to *Raskrinkavanje* by the readers through online forms and social media platforms amount to about 80% of all analyzed articles, thus helping minimize "editorial bias" in selection of materials to be rated and analyzed.

A distinct feature of *Raskrinkavanje's* methodology is identification of the sources of false or misleading content analyzed on the website. This is performed for each piece of disinformation reported by readers or spotted by the team members. The process includes identification of the source (first appearance of disinformation) and tracking down all the iterations of that same disinformation as it appears in other media (redistributed disinformation). If the original disinformation was published by media from BiH or one of the countries in the region where the same language is spoken, that article is analyzed and entered into the database.

In cases where the original disinformation was published in a foreign language, the media outlet from BiH or the region who was the first to translate and publish it in local language, is treated as the source of disinformation in the analysis. In such cases, the foreign source is noted in the text of the analysis, but it's not rated, nor entered into the database.

All the articles analyzed on *Raskrinkavanje* are thoroughly archived, sourced and dated on the website. A copy of each analyzed article is created on the website, with additional archiving in PDF format. All articles are thus saved as they had appeared in the media source at the time they had been found. This allows for long-term archiving of all analyzed disinformation in case they are deleted or edited in the original article.

Additionally, every media outlet whose material was analyzed has a "profile page" on *Raskrinkavanje*. This page lists all their articles that have been debunked, all the analyses in which they were debunked, the ratings that were given, as well as all available information about ownership, editorial staff and contact details of the media at the time it was first rated by *Raskrinkavanje*.

There are different methodologies and approaches to fact-checking, but all of them do pertain to publishing verified facts and creating a data base of such information. Consequently, the products of fact-checking have a high research value, since the information is checked, backed up by publicly available sources and the sample is non-partisan to the possible extent. The approach to this research and the use of a database with a significant sample over an extensive period of time, therefore, provides an adequate representation of disinformation in BiH media sphere.

2. Data analysis

Materials from *Raskrinkavanje*'s database which was used in this research were published between **November 20, 2017 and November 20, 2018**. In duration of the research period, the overall number of articles analyzed on *Raskrinkavanje* was 2,420, published by 752 media outlets and receiving 3,592 ratings on *Raskrinkavanje*'s platform. Out of that number, political disinformation appears in 1,486 articles, published by 477 media sources, with a total of 2,228 ratings. Here is a quantitative overview of media, articles, and ratings on *Raskrinkavanje* for the research period:

- Time frame of exported material: **November 20, 2017 and November 20, 2018**
- Sum of given ratings for all analyzed articles: **3,592**
- Sum of debunked articles: **2,420**
- Sum of media in database: **752**
- Articles without ratings: **47¹⁶⁴**
- Sum of ratings given for political disinformation: **2,228 (62.03% of total number of ratings)**
- Sum of debunked articles with political disinformation: **1,486 (61.40% of total number of articles)**
- Sum of media that published political disinformation: **477 (63.43% of total number of media in the database)**

¹⁶⁴ *Articles without ratings are covered in broader analysis of different media phenomena. These are analysis which are not fact-checks, so the analyzed articles are not given a rating (for example, analysis of candidate interviews and reporting during the election campaign 2018, analysis of „portal farms“, etc.).

2.1. Data collection

The following data was automatically generated from website's database: **165**

- Date and title of analysis;
- Names of media sources of analyzed articles;
- Date, title and rating of articles.

Additionally, the database also contains:

- ID numbers for articles and analysis (their unique identifying number in the database);
- URLs of analyzed articles on the website (each article is copied and stored in its original form on *Raskrinkavanje*);
- URLs of analysis of the articles on the website.

Apart from the automatically generated data, additional data was obtained through preliminary research and analysis of content published on *Raskrinkavanje* website in the indicated time period (one year). The following data was added to the database by research team:

1. **Designation of whether the analyzed article contains political disinformation or not**
(value 0: not political; value 1: political)

The content of the database was filtered in order to remove the articles which do not contain political disinformation. The articles defined as political disinformation contained content dealing with political processes, actors and events, including: election campaigns; civic initiatives, organizations and movements; international relations; work of official institutions; events of high political relevance in BiH and the region; social processes of political significance; day-to-day politics and similar.

2. **Designation separating sources and redistributors of disinformation**
(value 0: redistributed disinformation; value 1: the source of disinformation; value 2: first translation of content originally published in a foreign language)

3. **Types of media appearing in the sample**
(1 – publicly owned media; 2 – commercial media; 3 – online media; 4 – anonymous website; 5 – social media; 6 – publicly owned news agency; 7 – private news agency)

¹⁶⁵ The database with raw data is open and can be accessed on the following link: <https://tinyurl.com/yady7vbo>. The authors of this report welcome the use of the database for research or educational purposes, with previous notification.

The media outlets from database have been classified based on elements such as:

- type of ownership (public or private);
- transparency of ownership and editorial staff (published impressum and contact information);
- type of presence on the web (whether they only have online presence or with other types of outlets, such as radio, TV and print);
- organizational type (news agency, news media),

Depending on the combination of these elements, all 477 media outlets from *Raskrinkavanje's* database were sorted in one of the 7 categories cited above.

4. Location of the media outlets

(1: located in BiH; 2: located outside of BiH; 0: unknown location)

Location of each media outlet in the data base was established by the following criteria:

- For the media with transparent ownership/staff information:
 - a. Location of their offices
 - b. Location where they are registered
- For the media with non-transparent ownership/staff information:
 - c. Location of persons running the website (established through WHOIS data, or information on the location of administrators of their Facebook pages)
 - d. Domain address (national or commercial domain of the website)
 - e. Overall context/language clues¹⁶⁶ where neither of the above was available.

Depending on the combination of these elements, all 477 media outlets from *Raskrinkavanje's* database were sorted in one of the three categories:

- **Based in Bosnia and Herzegovina**

Websites and other outlets for which it can be established that one or more of the following is true: they are registered in BiH; have a BiH office/outlet (in case of international media companies); persons running the website are located in BiH, or are BiH citizens running the website from abroad; it is primarily oriented towards BiH audience; it has a national (.ba) domain.
- **Based outside of Bosnia and Herzegovina**

Websites and other outlets for which it can be established that one or more of the following is true: they are registered abroad; have an office/outlet abroad (in case of international media companies); persons running the website are from abroad; it is primarily oriented towards an audience outside of BiH; it has a national domain of some other country.
- **Unknown location**

Anonymous websites where it wasn't possible to establish any of the location criteria.

¹⁶⁶ Due to the fact that anonymous websites use content redistributed from other anonymous websites, social media users or regular media from all over the region, context and language clues are sometimes used to determine whether the person or persons running the website are based in Bosnia and Herzegovina or in one of the neighboring countries. Context clues include disproportionate presence of topics related to BiH, particularly local topics which do not appear (or are underrepresented) in the media from other countries in the region. Since the same language is spoken in 4 countries in the region with different local variations, language clues can also point to a location of website's owners and managers.

5. Targeted actors and “beneficiaries” of political disinformation

(2: Actors portrayed in negative light; 0: Actors portrayed in neutral manner; 1: Actors portrayed in positive light)

Actors of articles containing political disinformation are those which appear in one or both of the following roles:

- 1) subjects: appear as sources in disinformation pieces (peddle disinformation)
- 2) objects: are mentioned in disinformation pieces (targets or beneficiaries of disinformation)

The number of identified actors for each analyzed article was limited to 10. Each actor was named specifically as found in the text and its portrayal was marked as positive, negative or neutral.

Negatively portrayed actors are the ones who are **targets** of disinformation, meaning that false or misleading information was used to portray them in negative light, as opposed to the positively portrayed actors who **benefit** from disinformation. If an actor was portrayed in a neutral way, this means that disinformation either does not concern them (they are not central for the content of disinformation) or that there is no intention to skew public view of them in either positive or negative manner.

2.2. In-depth analysis of disinformation hubs and media clusters

Since *Raskrinkavanje's* approach to fact-checking entails additional research where the source of disinformation is tracked, as well as all the media outlets which redistributed it, the product is a complex data set for each analysis, where one or more one or more claims from several articles published in different media outlets. In order to establish regularities and connections between the media who frequently appear in the same analysis (meaning that they have published the same disinformation), these were starting questions for the research:

- **Are there regularities in the spreading of disinformation between different media outlets?**
- **Are there groups of media which are prone to use each other as sources of disinformation?**
- **If so, which groups of media can be identified as specific "clusters" which peddle same disinformation with considerable frequency and regularity?**

To answer these questions, an approach called "Association rule mining" was used to establish associations between different interconnected objects in a set. In this case, "objects" are the media outlets and they appear in sets of data produced by analysis of their articles and ratings they received. To establish these associations, a modeling technique called "Market Basket Analysis"¹⁶⁷ (MBA) was used. In MBA, the data are observed as a string of transactions, with each transaction containing different products. Applied to this data set, the fact-checking analysis represents a "transaction" and media outlets are "products" which appear together in the transaction (the fact-checking analysis).¹⁶⁸

The outcome is a set of rules of association, revealing which media outlets are more likely to appear together in the fact-checking analysis. The rules are established by a machine learning algorithm, which:

- 1) identifies media outlets which frequently appear together in fact-checking analysis (i.e. publish the same disinformation);
- 2) establishes rules of repetition (which media are repeatedly present in same "transactions" with more frequency);
- 3) calculates the likelihood of the media outlets appearing together in the fact-checking analysis;
- 4) creates "item sets": media "clusters" which appear in same analysis more regularly than other media.

¹⁶⁷ MBA is commonly used by retail stores to establish regularities in customers' choices, i.e. which products are frequently bought together.

¹⁶⁸ More details about the MBA is available here: <http://bit.ly/2JuxPYs>

In order to establish these rules, the algorithm is given predefined parameters which inform the machine learning process. The input parameters used are:

1) **Support:** Minimal value of "transaction" frequency

For example, if support value is 0.2, the algorithm will look for those media which appear together in at least 20% of all the fact-checking analysis and anything below that threshold will not be taken into account. If this value is too low, it would provide no relevant information, because it would connect nearly all the media to each other and produce too many item sets; if it is too high, in the most extreme case it would only connect the media which always appear together in fact-checking analysis (or none, in case there are no two media which always appear together) and produce too few item sets. With this in mind, two "support" parameters were used to establish more accurate connections and more relevant item sets:

- For media outlets which are overrepresented in the dataset, support of 0.008 (≥ 3 appearances in the same analysis) was used.
- For media outlets which are underrepresented in the dataset, support of 0.005 (≥ 2 appearances in the same analysis) was used.

In the output of the analysis, the "support" value shows the exact percentage of appearances in the same analysis.

2) **Confidence:** Percentage of analyses where a media outlet appears together with other media outlets which form a set together

In this case, the parameter "confidence" was set at 0.8, meaning that to form a cluster, the media in the set have to appear together in at least 80% of all analyses where all members of the cluster were mentioned.

The algorithm also calculates output results for the following parameters:

1) **Lift:** Correlation between individual media outlets

Lift is a number which represents the probability of two media outlets to appear in the same analysis compared to the average number of correlations between all the media outlets in the database. For example, if lift is 10, it means that these two media outlets are ten times more likely (than the average likelihood) to publish the same disinformation. The higher this number is, the stronger is the correlation between such media outlets.

2) **Count:** How many times two or more media outlets appear in the same analysis

This number represents how many times each of the media which form one cluster have been found in the same analysis (published the same disinformation). The higher this number is, the stronger is the correlation between such media outlets. All these parameters are shown within the rules appearing in each cluster. Visually, the rules are shown as circles of different sizes, where each circle represents one analysis where the media outlets have appeared together. The size of the circle indicates the strength of correlation between the connected media based on the calculated support value.

3. Legislative overview and interviews

In addition to analysis of database created by the fact-checking work of *Raskrinkavanje*, this research also provides insight into existing regulatory and self-regulatory framework for media in Bosnia and Herzegovina. This part of the research was based on desk research and interviews with relevant stakeholders.

3.1. Desk research

This part of the research is conducted in order to provide insight into strengths and weaknesses of existing legal/policy framework and self-regulatory framework in Bosnia and Herzegovina relevant for fighting media disinformation. Particular focus is put on changes and challenges brought about by digital age. The research is based on desk research, which entailed:

- Analysis of legal framework of media regulation on all administrative levels, with an objective to provide an exhaustive overview of relevant acts, rules and provisions related to disinformation;
- Analysis of written codes of conduct adopted by relevant self-regulatory bodies and/or journalists' organizations in BiH, with the objective to establish its relationship with the legal framework and estimate the level of preparedness of both for challenges of disinformation in digital age.

The analysis was primarily focused on regulation of media reporting i.e. media content, but it also takes into account the related issues of media ownership, public funding and regulative relevant for public media.

3.2. Interviews

Interviews with representatives of relevant institutions, media professionals, members of regulatory or self-regulatory bodies and academics in the area of journalism and media in BiH were conducted for the purpose of establishing the level of awareness and practices of administrative, professional and academic stakeholders related to the problem of disinformation in media, with emphasis on online media. Representatives of institutions tasked with media regulations, practicing media professionals (editors and journalists), representatives of journalist's associations and self-regulatory bodies and faculty staff from three universities were contacted for the purpose of this research. A total of 16 interviews were conducted.

Interview questions were designed on the basis of preliminary research of *Raskrinkavanje* database, as well as desk research of the legislative framework, in order to determine how representatives of institutions and the media view these key issues. For this purpose, semi-structured in-depth interviews were conducted, with a balance of open-ended and data gathering questions.

Interviews were conducted with nine representatives of media and media associations: Dejan Jazvić (editor in chief, *FENA*), Emir Habul (editor and journalist, *BHRT*) Adnan Jašarspahić (editor, *FTV web*), Amil Dučić (editor, *Klix*), Berislav Jurič (editor, *Bljesak*), Jasmin Begić (journalist, *TV Sarajevo*), Katarina Panić (journalist, *Srna*), Mehmed Halilović (journalist, lawyer, former media Ombudsman) and Ljiljana Zurovac (program director, The Press Council in BiH); four representatives of public institutions: Helena Mandić (assistant director of broadcasting, Communications Regulatory Agency of BiH), Edin Ibrahimfendić (technical advisory, The Institution of Human Rights Ombudsman/Ombudsmen of BiH), Sandra Kovačević (technical associate for radio, television and program broadcasting, Ministry of transport and communications of Republika Srpska) and Mensur Begić (technical advisory for information, Government of Tuzla Canton);¹⁶⁹ and three representatives of the academic community: Lejla Turčilo (professor, Department of journalism/communicology, Faculty of political sciences, University of Sarajevo), Vuk Vučetić (senior assistant, Department of journalism, Faculty of political sciences, University of East Sarajevo) and Amela Delić (senior assistant, Department of journalism, Faculty of philosophy, University of Tuzla).

Additionally, for the purpose of analysis of media professionals' practices and awareness, the insight into *Raskrinkavanje's* experience with local and regional media outlets is provided, together with the analysis of their responses when faced with evidence of unethical practice.

¹⁶⁹ Milanka Sudžum Papić, chief of communication department of the BiH Ministry of transport and communications, has also agreed to an interview, but notified the researcher that the questions relate to matters which fall out of the ministry's scope of authority.

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