

Information Integrity in Kosovo

Assessment of the Political Economy of Disinformation



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July 2022

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LIST OF ABBREVIATIONS

- (AAK) Alliance for the Future of Kosovo
- (AGK) Association of Journalists of Kosovo
- (AMPEK) Independent Electronic Media Association
- (ATK) Tax Administration of Kosovo
- (AVMSD) Audiovisual Media Services Directive
- (CEC) Central Election Commission
- (CSOs) Civil society organizations
- (DISICON) Information Integrity Conference
- (EC) European Commission
- (EU) European Union
- (ICANN) Internet Corporation for Assigned Names and Numbers
- (IMC) The Independent Media Commission
- (LDK) Democratic League of Kosovo
- (LVV) Vetevendosje Movement
- (NATO) North Atlantic Treaty Organization
- (NDI) National Democratic Institute
- (NGO) Non-governmental organization
- (NIS) Directive on Security of Network and Information Systems
- (PCK) Press Council of Kosovo
- (PDK) Democratic Party of Kosovo
- (RSF) Reporters Without Borders
- (RTK) Radio and Television of Kosovo
- (UNMIK) United Nations Mission in Kosovo
- (UNS) Journalists' Association of Serbia
- (USAID) United States Agency for International Development
- (VAW-P) Violence Against Women in Politics

EXECUTIVE SUMMARY

Kosovo's media and information landscape consists of traditional, online, and social media. Innovations and developments in media and communication, along with internet penetration—which, at 96.1 percent,¹ is among the highest in Europe—puts citizens at risk of rapid spread of disinformation.

The media environment reflects a tense political environment. Short-lived governments and intense political campaigning help fuel political, along with ethnic, division. This has cultivated a breeding ground for hate speech, and misogyny and inflammatory language. Media literacy is weak, many citizens are engaged online, and the country lacks an adequate plan to prevent and mitigate the rapidly growing threat of disinformation. Foreign interference is particularly challenging given ethnic divisions that are reinforced by low inter-communal engagement, and the lack of an updated cybersecurity strategy.

This lack of information integrity threatens Kosovo's otherwise vibrant democracy. Kosovo needs to increase its resilience to disinformation and address several critical risks to its information environment.

From November 2020 to July 2022, NDI conducted interviews and research to assess the status of information integrity in Kosovo (see [methodology](#) below). The assessment found that Kosovo lacks media literacy and its citizens are not fully equipped to critically assess information. Business and political interests are prevalent in disinformation campaigns, enabled by the lack of adequate regulation and transparency of media's finances and ownership, as well as a lack of mechanisms and protocols to fight foreign influence on the information space. Below are the assessment's key findings and recommendations, summarized by topic.

Key findings

Overall media landscape

1. **Outdated strategy on cybersecurity.** Kosovo enjoys one of the highest internet penetration rates in Europe and a very active population online. Nevertheless, its national cybersecurity is outdated. Institutions and political parties do not have the necessary strategies and capacity to mitigate growing cybersecurity threats.
2. **Weak independence of Kosovo's public broadcaster.** Radio Television of Kosovo remains vulnerable to political influence given poor transparency around the election of its board members.
3. **Journalists face problems with financial stability, security, and independence.** Journalists lack job security and face financial uncertainty. They are often required to meet a high quota of individual news items, face pressure to publish sooner and faster, and frequently self-censor.
4. **Kosovo's media landscape is divided along ethnic lines.** Serbian-speaking Kosovars get their news largely from Belgrade-sourced media, while the Albanian-speaking population gets its news primarily from Kosovo-based sources in the Albanian

¹ See [Rezultatet e Anketës së Përdorimit të Teknologjisë Informative dhe Komunikimit](#), November 2021.

language. Therefore, Kosovo's Albanian and Serbian communities trust sources only in their own languages.

5. **Media literacy needs to be raised.** NDI's public opinion research shows that Kosovo's citizens are not fully educated on identifying information disorders. On a scale from 1 to 5, they evaluate that the education system has prepared them to do so at an average of 2.9. They also find it somewhat difficult to distinguish false narratives from true information. Most people (82 percent) believe that websites/portals report false stories regularly or occasionally. 57 percent of citizens do some form of fact checking, although 41 percent still do not, up from last year (36 percent fact checking while 63 percent do not).

Legal and regulatory framework

6. **Parts of Kosovo's legal and regulatory framework for Kosovo's media environment are outdated and not in line with what is required for creating a free, independent, and transparent media environment.** There are a hodgepodge of regulations, laws, regulatory bodies that do not fully address the current state of media in Kosovo and are not fully in line with EU standards and best practices. Other regulations and laws are adequate but lack implementation or oversight. Online media is only self-regulated through the Press Council of Kosovo.

Independence and financial transparency

7. **Kosovo's media environment lacks financial and ownership transparency.** According to most of the editors and journalists interviewed, Kosovo's media environment is neither sustainable nor transparent. Most media outlets do not publish information on their finances or ownership; therefore, information on media ownership structures, particularly for online media, is ambiguous or unknown. The lack of sustainable financing models for private media makes it overly dependent on political and business influence. The lack of transparency obscures these relationships. There also needs to be more transparency related to use of public funds for advertising.

Information integrity

8. **Kosovo's media environment is vulnerable to disinformation.** Most of the experts interviewed for this assessment do not see traditional media in Kosovo to be the primary producer or spreader of information disorders. Disinformation is most prevalent in online news and social media. NDI media monitoring found that Kosovo's media environment contained false information, harsh language which exacerbated political tensions among the parties, misogyny, and foreign influence. Online and social media shared and, in some cases created, false, exaggerated, or harmful information without identifying it as such or undertaking fact-checking. Political leaders, parties, and their supporters used Facebook, including party fan groups, to launch unfounded attacks on each other. Social media also created and spread information disorders.
9. **Disinformation impacts public opinion.** While the citizens of Kosovo are aware of information disorders, they often believe the false narratives. For instance, NDI's April 2021 public opinion research shows that some false narratives on COVID-19 were

believed by nearly 40 percent of the overall population in Kosovo. Skewed and false narratives related to politics were believed by as many as one-third of Kosovo's population.² Some false narratives from Russia impacted up to 20 percent of citizens' opinions and perceptions.

Recommendations

Overall media landscape

Recommendation 1. The executive branch should develop and implement a national strategy on cybersecurity and foreign threats in line with EU practices that addresses threats in this field, alongside technological developments, such as artificial intelligence and new generations of wireless in increasingly digitally connected societies.

Recommendation 2. The legislative branch should ensure a transparent and independent process in appointing and monitoring Radio Television of Kosovo board members.

Recommendation 3. The media should increase fact-checking and professional capacities, as well as improve working conditions for journalists and enforce implementation of the respective laws, in accordance with the Law on Labor.

Recommendation 4. Key stakeholders must cooperate to bridge the ethnic divide in the access to media in the Serbian and Albanian communities, ensuring broader access to Kosovo-based media.

Recommendation 5. Kosovo needs to undertake an assessment of media literacy and develop a strategy to improve citizens' abilities to access and evaluate information. Its education system's curriculum should include media literacy at all levels.

Legal and regulatory framework

Recommendation 6. Kosovo should update the current legal and regulatory frameworks, as well as ensure alignment with EU standards and best practices.

Independence and financial transparency

Recommendation 7. To advance a free and independent media, Kosovo should develop financial and ownership transparency of the media in line with EU standards.

Information integrity

Recommendation 8. Kosovo's institutions and political parties need to develop standards and protocols to mitigate disinformation campaigns, improve cyber security, as well as address hate speech, harsh public discourse, and misogynistic language.

Recommendation 9. Civil society should help raise public awareness of disinformation, as well as develop better mechanisms to monitor the media and combat disinformation campaigns, including those from external actors.

² See National Democratic Institute report, [NDI Kosovo Public Opinion Poll](#), April 2021.

OVERALL MEDIA LANDSCAPE

Since the end of the armed conflict with Serbia in 1999, the media landscape in Kosovo has grown rapidly, with the establishment of several media outlets initially through donor help, as well as many national and local privately-owned media companies. Kosovo has a total of 19 television stations, 89 radio stations, and, since 2006 when the first news website emerged, many online news portals.³ The number of online news portals—some self-proclaimed as such—increased rapidly, although the exact number is unknown as no registration is required. With the highest internet usage in the Western Balkans, news portals are of great importance in Kosovo’s media landscape. The one weekly printed newspaper, *Koha Ditore*, stopped producing its printed version in January 2021. All other magazines and newspapers stopped printing with the onset of the COVID-19 pandemic. Although vibrant, the media environment faces many challenges in terms of sustainable financing, independence, transparency, working conditions and safety, laws and regulations, and safety for journalists.

Legal frameworks for Kosovo’s media landscape began during the administration of the United Nations Mission in Kosovo (UNMIK). There are a hodgepodge of regulations, laws, and regulatory bodies that do not fully address the current state of media in Kosovo. Other regulations are adequate but lack implementation or oversight.

Freedom House’s 2022 report noted that Kosovo's democracy is “partially free,” scoring 56/100, and scoring two out of four in the freedom of expression and belief measurements.⁴ The government and business interests exert undue influence on editorial processes, including at the public broadcaster RTK. The report also states that journalists report frequent harassment and intimidation, noting that several journalists were attacked while reporting in northern Kosovo in 2021. The lack of transparency in private media ownership and advertisement leaves the media vulnerable to pressure and influence from business interests. In 2022, the World Press Freedom Index ranked Kosovo 61/180, noting that Kosovo’s media are dependent on advertising either from the government or political parties, both of which are distributed in a non-transparent and partisan manner. The report also points out that private media newsrooms are subjected to editorial interference on media owners by powerful political or business groups.⁵

Political polarization, ethnic tensions, marginalization of women and non-majority communities, and low government responsiveness to citizen concerns—have created an environment where anti-democratic narratives, including information disorders engineered domestically and from abroad, are quickly taking root. Since independence in 2008, Kosovo occupies a particular place in the Kremlin’s strategic interest in the Western Balkans, including as a point of leverage with both Serbia and the West. Russia, which does not recognize Kosovo, seeks to undermine its sovereignty and recognition by the international community. Russian-owned media and managed outlets in Serbia spread false information, including on Kosovo.⁶

³ See Independent Media Commission (IMC), [Llojet e licencave dhe adresarët](#), January 2021.

⁴ See [Kosovo: Freedom in the World 2022 Country Report](#).

⁵ For more information see: [Kosovo | RSE](#).

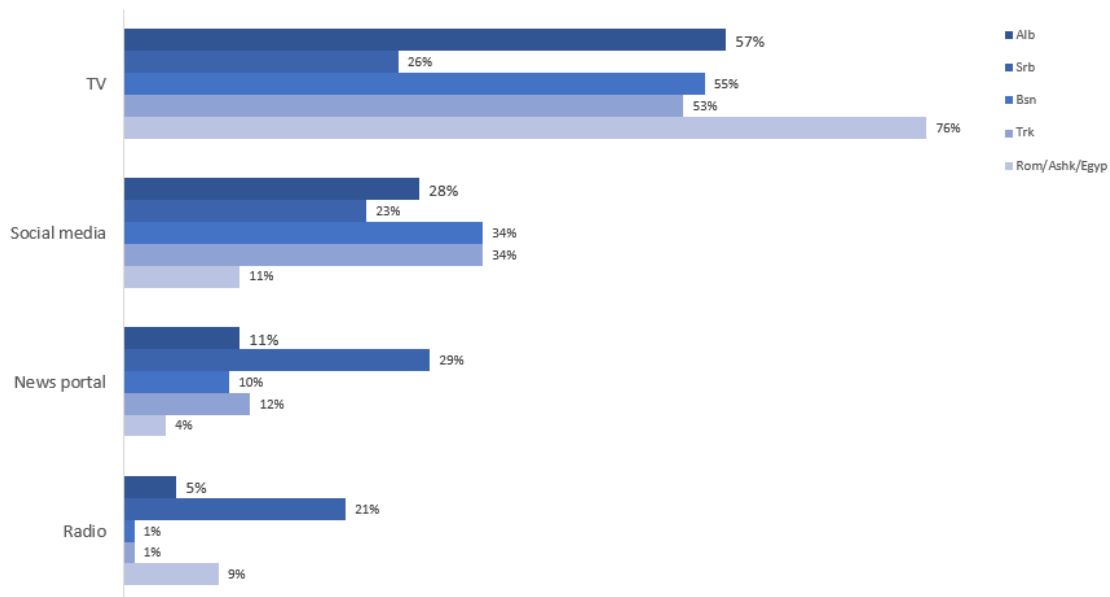
⁶ Kallaba, Pëllumb [Russian Interference in Kosovo: How and Why?](#), Kosovo Center for Security Studies (KCSS), October 2017.

A strong understanding of the origins, nature, and impact of the variety of threats Kosovo faces is critical to countering threats to the democratic information environment. Responses to manipulated information in Kosovo must be rooted in an especially detailed understanding of causal environmental factors—particularly its vulnerabilities and the disproportionate impact of manipulated information on women and marginalized communities—to ensure that systemic measures to bolster the information environment are tailored to Kosovo’s context.

Internet use

With 96.1 percent internet penetration, Kosovo’s connected population is the highest in the Western Balkans, and one of the highest and fastest-growing in Europe.⁷ Its 1.76 million internet users represent an increase of 9.7 percent (156,000) between 2020 and 2021. There are 1.1 million users of social media.⁸ Facebook is the most widely used social media platform in Kosovo (910,000 users), followed by Instagram (750,000 users). Twitter is not widely used (63,200). While a boost to Kosovo’s society and economy, this high penetration also makes Kosovo vulnerable to the threat of information disorders.

Facebook is the most popular social media among youth in Kosovo. NDI’s public opinion research on youth shows that 87% of them are on Facebook, followed by 77% on Instagram and 54% on Snapchat.⁹ This research has also shown that social media platforms are a source of information for them, with 48% from the Albanian community receiving information from social media on a daily basis and 24% from the Serbian community. As shown in the table below, social media are the second most trusted source of information for youth in Kosovo.



According to the Kosovar Agency for Statistics, 93.1 percent of individuals who have had internet access away from home or work had access via mobile phone or a smartphone.¹⁰ Mobile users may find it logistically more difficult to fact-check information themselves on non-social media sources. For instance, if a trusted news website is not mobile-optimized, that

⁷ See [Rezultatet e Anketës së Përdorimit të Teknologjisë Informative dhe Komunikimit](#), November 2021.

⁸ Kamp, Simon [DIGITAL 2021: Kosovo, DATAREPORTAL](#), February 2021.

⁹ NDI’s Public Opinion Research, Youth Participation, December 2021.

¹⁰ See [Rezultatet e Anketës së Përdorimit të Teknologjisë Informative dhe Komunikimit](#), November 2021.

content is more accessible to desktop users, leaving those who are predominantly mobile users more susceptible to information disorders.

Over the past decade, dramatic technological developments and innovations, and widespread access to the internet and social media have all impacted Kosovo's information environment overall, changing the way that citizens get information. An increasingly connected society, increasing capabilities of artificial intelligence, and advances to wireless technologies, including 4G and 5G, have expanded the challenges of information integrity.¹¹ Media companies adopted new business models to include online media and social media, and redefined the role of journalists. Most of those NDI interviewed stated that there has been a shift from traditional media to online media compared to five years ago, with online media becoming an important source of information in that time. NDI's research found that online and social media contain information disorders, such as disinformation, misinformation, biased information or misogynistic and harsh language.¹² According to NDI's 2021 regional poll, interactive content, such as interesting images and videos, grabs the most attention on social media for nearly half of the population (45 percent). This creates an opening to undermine information integrity, since videos, photos/graphics can be easily used to manipulate or mislead the public.

According to NDI's March 2021 regional public opinion research, 67 percent of Kosovo's population use social media to check in on family and friends, 66 percent use it to get the latest news updates, 28 percent use it for entertainment, while 27 percent get commentary and analysis of the news from social media. In addition, in interviews for this assessment, NDI was told that sharing information from social media and checking in on friends and family can reinforce the tendency for people to accept narratives discussed in their networks. This fuels disinformation/misinformation: messages that otherwise would emanate from suspicious sources instead arrive as forwarded messages from family and friends which are therefore trusted more readily. For instance, WhatsApp has been documented as a leading global factor in propagation of false information.¹³ This assessment found examples of this in Kosovo. For instance, one professor interviewed mentioned the spread of disinformation among friends and family regarding COVID-19. *"Disinformation that lemon is a cure for COVID-19 symptoms was widely spread through messaging apps in the beginning of the pandemic."*

While Kosovo's society is very active online, there is a lack of a comprehensive national strategy on cybersecurity. The existing cybersecurity strategy, "State Strategy for Cyber Security and Action Plan 2016 - 2019," is outdated and fails to address online threats. Experts agree that cybersecurity threats remain one of the most prominent challenges, as emphasized in a 2019 conference "Challenges in Cyberspace II."¹⁴ Kosovo would benefit from developing and implementing a strategy on cybersecurity based on and in line with the EU's best practices and standards. These should include the EU's Cybersecurity Strategy,¹⁵ which aims to build resilience to cyber threats and ensure citizens and businesses benefit from trustworthy digital

¹¹ For more information on technological developments, see: [Research and Innovation Brief - Annual Report on Cybersecurity Research and Innovation Needs and Priorities](#), May 2022.

¹² See [NDI, Information Integrity Challenges: A growing threat to Kosovo's democracy](#), October 2021.

¹³ See Himanshu Gupta and Taneja Harsh, "WhatsApp has a Fake News Problem - that can be Fixed without Breaking Encryption," *Columbia Journalism Review*, 2018.

¹⁴ See University of Business of Technology (UBT), [Cybersecurity and privacy remain challenges for Kosovo](#), November 2019.

¹⁵ See European Union, [The Cybersecurity Strategy](#), 2021.

technologies, and the EU's Directive on Security of Network and Information Systems (NIS)¹⁶ which provides legal measures to boost the overall level of cybersecurity. Such a step would also aid Kosovo's goal of joining the European Union.

Broadcast media

Kosovo's media landscape includes national and local media, as well as private media and the public broadcaster Radio and Television of Kosovo (RTK). While the majority of the media has only local or regional reach, they are underfunded. The media with the greatest reach and influence on public opinion are national and located in Pristina. According to the Independent Media Commission's 2021 report, Kosovo hosts a total of 19 television stations, 89 radio stations, 42 distribution operators, and 105 audiovisual media service providers. NDI's public opinion research shows that TV stations are one of the most trusted sources of information for the majority of the population of Kosovo, 74 percent overall.¹⁷

RTK hosts Kosovo's public television and radio stations. It is publicly funded, although it also accepts private payments for advertising.¹⁸ RTK consists of two radio channels and four television channels, one of which broadcasts in the Albanian language, one in Serbian, and two others are obliged to share 15 percent of their programming in languages of other communities in Kosovo. RTK board members are elected by the Assembly of Kosovo in a simple majority vote, who in turn appoint and dismiss the general director of RTK. The board also appoints and dismisses directors and vice directors of the radio and television channels with the proposal of the general director. The directors appoint the editors in chief of the departments of the television channels. One editor in chief pointed out that this poses a big problem because the *"public broadcaster is controlled by a parliamentary majority, which means that it's controlled by whoever is in the government...so its employees and managerial chain are controlled by the majority in the parliament."*

According to the European Commission's 2021 report on Kosovo's progress toward EU integration, the public broadcaster remains vulnerable to political influence, and a sustainable solution for its funding still needs to be found.¹⁹ The fact that RTK also accepts private advertising, despite its generous public funding, destabilizes the private advertising market and other media companies. A media expert explained that *"several years ago, the media had easier access to funds because there were a few small media outlets. Now, if you take Kosovo's Telecom for example - which is one of the biggest advertisers - before they had two to three channels on which to spend on marketing and now it's a big competition."*

Nevertheless, there has been recent progress in the process of RTK's selection of its new board,²⁰ which was praised by civil society and the international community, including by the EU Parliament as *"transparent and merit-based."*²¹

As further detailed in the section below on legal and regulatory frameworks, Kosovo has a media regulatory institution, as well as membership organizations for the media which establishes guidelines for its members. The Independent Media Commission (IMC) is

¹⁶ See European Union, [NIS Directive](#).

¹⁷ National Democratic Institute report, NDI Public Opinion Poll, April 2022.

¹⁸ See Gazeta Zyrtare e RKS, [LIGJI NR. 04/L-046 Për Radio Televizionin e Kosovës](#).

¹⁹ See [EU: Kosovo Report 2021](#).

²⁰ See [Monitoring the process of selecting RTK new board members](#), December, 2021.

²¹ [European Parliament resolution](#) on the 2021 Commission Report on Kosovo, July 6, 2022.

responsible for the regulation, management, and oversight of the broadcasting frequency spectrum (including, television, radio and network providers). In addition, online media is regulated through the Press Council of Kosovo (PCK).²² The Independent Electronic Media Association (AMPEK)²³ functions as an NGO and represents the interests of commercial broadcasters in the country (including television broadcasters and radio). AMPEK is mainly involved in advocating for legislation related to the audio-visual media sector and advocacy for issues of media freedom in general.²⁴

State of journalism

Working conditions for journalists remain a challenge. Journalists face problems related to job stability, security, and independence. The Association of Journalists of Kosovo (AGK) is the largest and most active membership-based organization that represents the interests of journalists in the country and advocates for freedom of the media. Parallel to this Association, Kosovo Serb journalists have their own association, the Association of Journalists of Kosovo and Metohija, which represents Kosovo Serb media. This Association is a branch of the Serbia-based Journalists' Association of Serbia (UNS).

An AGK report on media freedom and journalist safety in 2020 indicates that the main challenges for journalists are the lack of job security and financial uncertainty, which worsened due to the pandemic.²⁵ Typically, Kosovar journalists move from one newsroom to another seeking better working conditions. According to a researcher interviewed for this assessment, two thirds of journalists do not have working contracts with their employers, which, in addition to denying them job security and better pay, denies them access to essential paid professional global online services. In addition, journalists often face pressure to skew their reporting to avoid conflicts with an outlet's political or financial backers. They are free to suggest a story, but political and business interests often influence the content, limiting the freedom of journalists in practice. For the journalists of private media outlets, this is especially true, as they must navigate myriad interests of business or other interests of media owners. However, journalists believe that there is more self-censorship than direct influence of owners or managers on how a topic should be covered.²⁶

Media and communications developments of the past decade, especially with the proliferation of online media, have had a considerable impact on journalists. The changes redefined their role and created pressure on both outlets and journalists for swift adaptation and more and faster publications. One media expert explained that one of the biggest changes with online media is that there are journalists under pressure to publish news very quickly without fact-checking. AGK's report also points out that journalists—especially those that work in news portals—are required to deliver a high quota of news items, facing pressure to publish sooner and faster, which negatively affects the quality of journalism in the online sector.²⁷

Safety is another concern for journalists. Reporters Without Borders' report on Kosovo states that journalists and media are exposed to a hostile environment that includes physical, verbal,

²² See [Press Council of Kosovo](#), September 2021.

²³ For more information see [Association of Independent Broadcast Media of Kosovo](#).

²⁴ Audio-visual includes television, audio includes radio, written media includes print media and news portals.

²⁵ See Association of Journalists of Kosovo (AJK), [Kosovo Indicators on the level of media freedom and journalists safety](#), December 2020.

²⁶ Ibid.

²⁷ Ibid.

and cyber-attacks.²⁸ AGK's report shows that there was an increase to 24 threats and attacks against journalists during 2020, up from 21 cases in 2019 and 17 in 2018.²⁹ A Kosovo Serbian journalist interviewed for this assessment stated that it is very likely that his work makes him a target. "*Journalists who exposed things were being attacked very heavily, and there were also journalist's personal data that were published. You can easily be a target publicly even in Kosovo, it's difficult for journalists when it comes to mitigating this information.*"

A lack of subject specialization also hinders journalists. Given limited resources at news outlets, journalists are obliged to cover a wide range of topics and areas, often without knowledge or expertise. For instance, a journalist might cover the economy and national security one week and then cover justice affairs another week. Journalists in Kosovo and international reports have repeatedly identified overextension of journalists as a significant challenge to their professionalism. Media owners do not further professional development of journalists, likely due to the lack of financial sustainability of the media.

Ethnic divide

Kosovo's media landscape is divided along Albanian and Serbian ethnic and linguistic lines. According to Reporters Without Borders,³⁰ access to certain information is often limited to a particular ethnic or political group, and media outlets tend to focus on issues concerning their own nationality and cover them solely from its viewpoint.³¹ In 2022, the World Press Freedom Index noted that the Serbian-language media face the extra challenge of a small unsustainable market in which media is dependent on funding from Serbia or international grants.³² Consequently, Serbian-speaking Kosovars get their news largely from Belgrade-sourced media and not Kosovo-based media. The Albanian-speaking population gets its news primarily from Kosovo-based sources in the Albanian language only. Trust in sources of information amongst Kosovo's population is split accordingly, a fact which is reflected in NDI's public opinion research. For instance, according to NDI's April 2021 public opinion research, the majority of the Albanian population trust Kosovo TV stations, whereas nearly half of the Serbian population trust Serbian-based TV stations. The non-majority non-Serbian communities are split among Serbian and Albanian sources, as well as some media in their own languages.

One Belgrade-based TV provider covers all 10 Serb-majority municipalities in Kosovo. Three of the four northern municipalities have an additional local provider. They mainly receive and provide news from Belgrade-based media, except for a few local TV stations, such as TV Most. None of the Kosovo-based channels in the Albanian language are present in these municipalities, nor is RTK 2, a Kosovo state-owned media in the Serbian language.

NDI's research has found that the quality and quantity of Kosovo-based media in the Serbian language is limited, further creating a disjointed information environment between Kosovo Albanians and Kosovo Serbs.³³ This, together with language barriers, means that the flow of information from Kosovo's media into Serb communities is limited or nonexistent. As detailed in the section below, Russian-based disinformation proliferating in Serbia-based media threatens the information integrity in the Serbian-speaking community in Kosovo. The Serbian-

²⁸ See Reporters Without Borders (RSF), [Coronavirus crisis increases instability](#), 2021.

²⁹ See Association of Journalists of Kosovo (AJK), [Kosovo Indicators on level of media freedom and journalists safety](#), December 2020.

³⁰ See Reporters Without Borders (RSF), [Coronavirus crisis increases instability](#), 2021.

³¹ Ibid.

³² For more information see: [Kosovo | RSF](#).

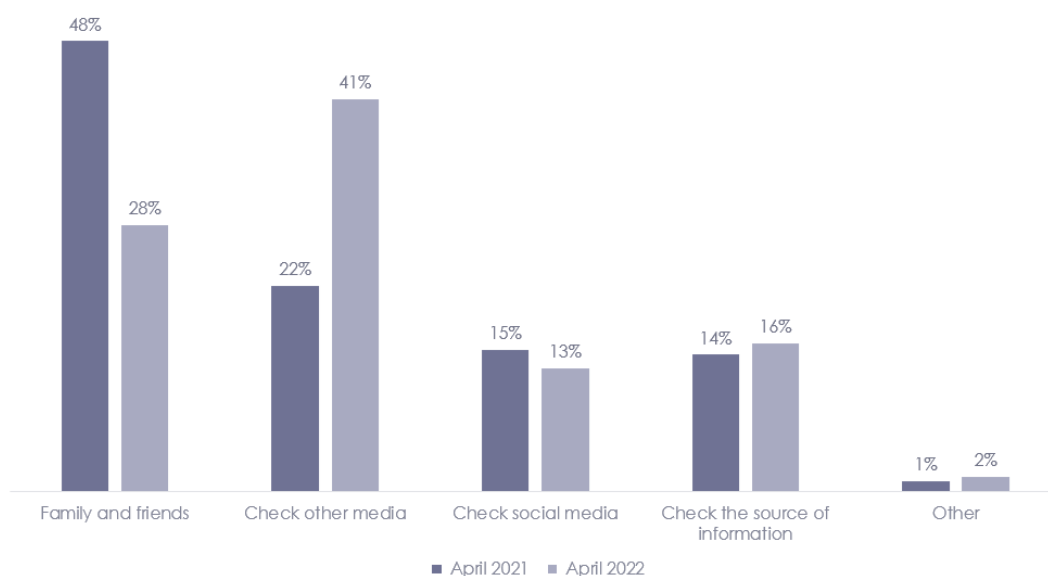
³³ See National Democratic Institute NDI report, [Information Integrity Conference - DISICON](#), October 2021.

speaking community is thus vulnerable to Kremlin sponsored false and sometimes extreme narratives designed to foment distrust and social and political cleavages.

Media literacy

Media literacy, the ability to access, evaluate, analyze, create, and act using all forms of media and communication, is lacking in Kosovo.³⁴ Along with its benefits, the proliferation of online media and social media brought new challenges that need to be addressed in an innovative and comprehensive way. Citizens must be aware of and better understand innovations in the communication and information sphere—this includes being literate in all forms of media and communication and proactive on how they get information and communicate. It is paramount for citizens to understand digital tools, how to fact check online, and identify information disorders, in order to be informed in an accurate manner.

NDI’s public opinion research shows that Kosovo’s citizens are not fully educated in identifying information disorders.³⁵ On a scale from 1 to 5, they evaluated that the education system has prepared them at an average of 2.9. Additionally, they find it somewhat difficult to distinguish false narratives from true information. According to NDI’s poll conducted in April 2022, most people in Kosovo (82 percent) believe that websites/portals report false stories regularly or occasionally. Despite this awareness, 41 percent of citizens do not fact check the information they receive, 28 percent turn to family and friends and 13 percent check social media. Another 41 percent check other media outlets, while 16 percent check the source of the information. Nevertheless, in comparison to public opinion research from 2021, there is a significant drop among the population who turn to family and friends, from 48 percent to 28 percent. According to NDI’s regional poll conducted in March 2021, 69 percent of people in Kosovo believe that false news comes from domestic disinformation efforts.



A majority of the experts interviewed for this assessment pointed out that Kosovo’s media landscape consists of a huge amount of information published through various media outlets,

³⁴ DiMauro, Margaret, [Media Literacy in The Age of Misinformation and Disinformation](#), February 2021.

³⁵ National Democratic Institute report, NDI Public Opinion Poll, April 2022.

with that information coming from different—often unknown—sources. Kosovo’s citizens are bombarded with information daily by online media.

There has not yet been an objective and thorough assessment of media literacy among citizens, but anecdotal evidence from interviews from this assessment suggests that there is a lack of critical thinking and knowledge on technology that would enable citizens to search, prioritize, access, and analyze information and make sense of content. A university professor interviewed for this assessment emphasized that *“Kosovo’s society is not educated in a way to have critical thinking and this affects the way they read and see news.”* He added that *“they just read on Facebook, they don’t analyze what and are not informed who provides this information. They are not educated on online media. They trust everything that is being published in newspapers, online media, and TV. And today they are very confused.”*

Several interviewees underscored the notable lack of technological knowledge and skills amongst the elderly. This has a direct impact on the way they perceive information that comes through online sources, such as news portals, blogs, social media. A journalist stated that the tendency among this generation to believe every piece of information they read or see is very high: *“Elderly believe everything and that impacts their decision on whom to vote for. You will change your judgment if you are presented with fake news all day.”*

Kosovo lacks a strategy on media education, including media literacy and digital literacy.³⁶ Given the need to raise the level of critical judgment of media content in Kosovan society, the approach for media education for children, young people, adults, and the elderly faces various challenges, hence different solutions.³⁷ These challenges need to be addressed by raising awareness of information disorders, such as disinformation and misinformation, as well as by including media education in formal and informal learning. Kosovo should begin a media literacy program at all levels of education. So far in Kosovo, there have been some small-scale initiatives in this regard, such as Education on Media and Information,³⁸ PONDER program,³⁹ or initiatives from the Independent Media Commission.⁴⁰

An IMC official interviewed for this assessment stated that there is a need for a different and more intensive approach on media literacy. He pointed out that the IMC does not receive many complaints and that it is difficult for it to monitor all media due to a lack of human resources. He added that *“the public should be educated to file complaints, to know where to complain and ask the media to be more responsible.”* But, another expert interviewed expressed concerns regarding the IMC’s work in terms of raising public awareness. *“If Kosovo institutions do not promote their own legislation, how can we expect people to know things? Kosovo should be more engaged in media literacy. I need to emphasize this. It’s of critical essence to support IMC in this regard and without any support from internationals this won’t happen.”*

Civil society organizations (CSOs) have been able to play a critical role in shaping the media landscape, while developing the capacity to monitor, detect and fight information disorders in

³⁶ Digital literacy is the ability to use information and communication technologies to find, evaluate, create, and communicate information, requiring both cognitive and technical skills.

³⁷ See European Journalism Observatory (EJO), [Edukimi medial duhet të promovohet, por si dhe cilat janë sfidat?](#), January 2020.

³⁸ See Institute for Development Policy (INDEP), [Edukimi mbi median dhe informacionin](#), November 2021.

³⁹ See UNICEF - Kosovo Program, [Instilling critical thinking skills to empower adolescents to analyze the role of media in our culture](#), 2021.

⁴⁰ See Independent Media Commission (IMK), [Edukimi Medial](#), October 2021.

Kosovo. The environment for CSOs has evolved, given the worldwide scale of engagement and efforts on fighting disinformation threats. There have been some CSO initiatives on raising awareness amongst the general public in regards to information disorders and media education. Nevertheless, this assessment found that there is a lack of a coordinated approach among CSOs on monitoring, detecting and analyzing disinformation campaigns, especially foreign influence.

Due to the instant and rapid technological developments that have a great impact on media and communication, there is a need for constant monitoring and assessment of the media environment. This will require advanced technology and the inclusion of civil society in a far-reaching effort in combating disinformation, monitoring, raising awareness on these issues, as well as improving media literacy in Kosovo, is crucial for improving legislation, strengthening platform responses, and increasing public understanding and involvement.

Targeted media landscape recommendations

Internet penetration and cybersecurity

Recommendation 1.1. Kosovo's executive branch should assess the overall cybersecurity state and develop a national strategy on cybersecurity.

Recommendation 1.2. Political parties should develop internal cybersecurity protocols including internal communication, data storage and backups, security for websites, internet in the party and emails.

State of broadcasters

Recommendation 2.1. The Assembly should follow a transparent and independent process in appointing RTK board members.

State of journalism

Recommendation 3.1. The media should improve working conditions for journalists and enforce the implementation of the respective laws, such as the Law on Labor.

Ethnic divide

Recommendation 4.1. Civil society and media should establish open platforms to host dialogue with all stakeholders to discuss practices that contribute to ensuring information integrity.

Recommendation 4.2. Civil society and media should bring together representatives of the media from different communities to help establish communication bridges to reduce the ethnic divisions in the media industry.

Media literacy

Recommendation 5.1. The executive branch should develop and conduct a national assessment on media literacy and digital literacy to lay a foundation for Kosovo to develop a national strategy on media literacy.

Recommendation 5.2. The Ministry of Education should include media literacy programs in its formal educational institutions, training programs on digital literacy as well as informal education.

Recommendation 5.3. IMC should increase its efforts in campaigns to raise awareness of media literacy and information disorders.

Recommendation 5.4. Civil society should work together with all stakeholders to advance media literacy in Kosovo, such as innovative extracurricular activities.

LEGAL AND REGULATORY FRAMEWORK

The Kosovo constitution guarantees freedom and pluralism in the media and forbids censorship and Kosovo has a lively and pluralistic media environment.⁴¹ However, some laws and regulations need to be updated, implemented, and brought in line with European standards and best practices to ensure a free, independent, and transparent media environment.

Legal framework

The Constitution of Kosovo guarantees freedom of expression and the media under Articles 40 and 42, which allow anyone to disseminate and receive information. The Assembly of the Republic of Kosovo, with the contribution of civil society organizations and the international community, has promulgated laws that regulate the way media functions. However, Kosovo lacks laws regulating the media's financing, ownership, public broadcasters, and their legal status. Their activities are covered well in some cases, such as the laws on the Protection of Journalistic Sources,⁴² Civil Law against Defamation and Insult,⁴³ Law on Protection of Whistleblowers,⁴⁴ Law on Access to Public Documents,⁴⁵ and Law on Personal Data Protection.⁴⁶ Nevertheless, the laws on the Independent Media Commission (IMC)⁴⁷ and Radio Television of Kosovo (RTK) are outdated and do not address current challenges, especially online media.⁴⁸ Others, although adequate, lack implementation.

Media are registered as businesses with the Tax Administration of Kosovo (ATK) and not as media entities. Audio and audio-visual broadcasters, but not online media, then apply for a license at IMC, while online media is not required to secure a license to operate.

The Civil Law against Defamation and Insult⁴⁹ establishes civil liabilities for defamation and insult, while ensuring the right to freedom of expression and the media's role in the democratic process as public watchdogs and transmitters of information to the public. According to the law, a person has the right to demand an end to the defamation and insult. The media must

⁴¹ See [EU: Kosovo Report 2021](#), October 2021.

⁴² Official Gazette of RKS, [Law No. 04/L-137 on the Protection of Journalism Sources](#), 2017.

⁴³ Official Gazette of RKS, [Law No. 02/L-65 Civil Law Against Defamation and Insult](#), 2008.

⁴⁴ Official Gazette of RKS, [Law No. 06/L-085 on Protection of Whistleblowers](#), 2018.

⁴⁵ Official Gazette of RKS, [Law No. 06/L-081 on Access to Public Documents](#), 2019.

⁴⁶ Official Gazette of RKS, [Law No. 06/L-082 on Protection of Personal Data](#), 2010.

⁴⁷ Official Gazette of RKS, [Law No. 04/L-044 on the Independent Media Commission](#), 2012.

⁴⁸ Official Gazette of RKS, [Law No. 04/L-046 on Radio Television of Kosovo](#), 2012.

⁴⁹ Official Gazette of RKS, [Law No. 02/L-65 Civil Law Against Defamation and Insult](#), 2008.

refute the defamation and insult in the same medium and give it the same prominence within eight days of receipt of the relevant demand. Such actions may include seeking a remedy from the publisher of an allegedly defamatory or insulting expression and filing a claim with the IMC or PCK.

Journalists in Kosovo enjoy some protection. For instance, the Law on Protection of Whistleblowers strengthened the protection of journalists' sources and the Law on Access to Public Documents has started to be implemented. The Information and Privacy Commissioner has been elected. However, the Assembly's Committee on Public Administration, Local Governance and Media – the sole body with the right to initiate legislation on issues related to freedom of expression and the media – has at times operated in a non-transparent and non-inclusive manner. In addition, the Law on Protection of Journalistic Sources needs to be brought in line with European standards regarding the rights of journalists to protect their sources.⁵⁰

Regulatory framework

Experts interviewed argued that the media market has been developed in an unregulated way regarding standards and legislation implementation. A chief editor explained that the “*media market is free in principle but there is a need to regulate further concentrated media ownership to ensure competition and pluralism.*”

As noted above, the two main institutions, created in 2005, have contributed to media regulations in Kosovo: the Independent Media Commission (IMC) and the Press Council of Kosovo (PCK), a self-regulating body. Article 141 of the Constitution of Republic of Kosovo⁵¹ asserts that the IMC is a body which regulates the range of broadcasting frequencies in the Republic of Kosovo, issues licenses to public and private broadcasters, establishes and implements broadcasting policies, and exercises other competences as set forth by law. The current IMC law⁵² gives the institution power to license public and private broadcasters. The IMC establishes and implements policy and regulates broadcasting rights, obligations, and responsibilities of individuals and entities who provide audio and audiovisual media services. Its seven-member board is appointed by the Assembly and this role can weaken its independence.

The IMC's broadcasting policies have evolved generally in line with internationally accepted standards of broadcasting, and human rights, particularly with the European Commission Directive AVMS fully respecting democracy, rule of law, protection of freedom of expression and pluralism of audio visual of media services. However, EU standards were updated in 2018, especially regarding video clips or user-generated content. Therefore, IMC regulations should be reviewed to ensure they are in line with current EU standards as outlined in the EU's Audio-Visual Media Services 2018/1808 directive.⁵³

The European Commission's Kosovo 2021 Progress Report⁵⁴ recommends that Kosovo updates the law on the IMC to bring up to EU standards, especially regarding the IMC's power

⁵⁰ See [EU: Kosovo Report 2021](#), October 2021.

⁵¹ Official Gazette of RKS, [Constitution of the Republic of Kosovo](#).

⁵² Independent media Commission (IMC), [Law NO. 04/L-044 on the Independent Media Commission](#).

⁵³ The European Parliament and the Council of the European Union, [Directive \(EU\) 2018/1808 of the European Parliament and of the Council](#), November 2018.

⁵⁴ See [EU: Kosovo Report 2021](#), October 2021.

over video sharing platforms and for it to make public the finances and ownership of the entities it oversees. It should follow the guidelines laid out in the EU's Audiovisual Media Services Directive (AVMSD).⁵⁵ However, there are concerns from news portals that enhancing the government's regulatory powers over the media might interfere with free speech. For instance, PCK and AGK oppose initiatives to include online media content as part of the regulatory mechanism by state institutions.⁵⁶

An IMC official told the assessment team it is working on the draft regulation on media ownership and concentration of audio and audiovisual media service providers. The aim is to establish standards regarding media pluralism and diversity and transparency in media ownership, establishing rules on the concentration of ownership in the media, prevention of monopoly in the media market, prohibition of media domination and pressure, freedom of expression, preserving editorial independence and the right to objective information in accordance with national legislation and European standards and best practices.

The PCK is a self-regulated body founded for and by the print media sector in Kosovo. Its mission is based on the Press Code of Kosovo,⁵⁷ which defines the functions, rights and obligations of journalists. The purpose is to guarantee the autonomy of the profession and service to public interest. The PCK is guided by its by-laws⁵⁸ created and approved by editors and editors in chief of written media who are members of PCK. In the past, the PCK represented only print media, whereas currently, with the abolition of print media in Kosovo, it only represents news portals. As the PCK does not license or register news portals, it cannot issue fines or take actions, such as revoke licenses as the IMC does against media. Such action would violate the Press Code of Kosovo. Instead, the PCK acts as a self-regulatory body for online media, by reacting to complaints about the media's compliance with ethical principles of reporting.

It should be noted that the PCK is facing difficulties in terms of sustainability, especially in having financial support to function properly. The Kosovo Assembly should consider ways to make the PCK financially sustainable, perhaps, as some experts have suggested to NDI, from the funding of RTK.

A journalist described the Press Council as an advisory institution, whose *"decisions are not obligatory nor are they applied by the media. Regulatory institutions don't do their job and their impact in regards to different factors who have influence in the media."* Additionally, given that the PCK is a nonprofit organization, it is limited in funds and cannot implement all of its duties. Achieving financial sustainability is crucial and the PCK should increase its membership.

Kosovo institutions have made at least two attempts to regulate online media, which were unsuccessful. In 2018, the Parliamentary Committee on Public Administration, Local Governance, and Media began an initiative to draft Kosovo's media law but the effort did not materialize. Similarly, the Kosovo Ministry of Internal Affairs attempted to regulate the "fake news problem" through the Kosovo Criminal Code, considering it as hate speech. Both these ideas have been condemned by the media experts, media executives, and journalists. In

⁵⁵ The European Parliament and the Council of the European Union, [Directive \(EU\) 2018/1808 of the European Parliament and of the Council](#), November 2018.

⁵⁶ See Press Council of Kosovo (PCK), [The PCK and AGK oppose the regulation of online media](#), April 2021.

⁵⁷ Press Code for Kosovo, [Press Code for Kosovo](#), March 2005.

⁵⁸ See Press Council of Kosovo, [Press Council of Kosovo Statute](#).

addition, in July 2022, members of parliament began to raise the issue again, triggering a repeat of the media's concerns about overregulation and lack of consultation with the media and civil society.

Targeted legal and regulatory recommendations

Regulatory framework

Recommendation 6.1. The Kosovo executive branch and Assembly should review laws and regulations regarding the media in Kosovo to ensure they are in line with EU standards and best practices, including those set forth by the Council of Europe, the European Convention on Human Rights, and the Digital Services Act package.

Recommendation 6.2. Kosovo's Assembly should update the law on the Independent Media Commission to harmonize it with the EU's Audiovisual Media Services Directive (AVMSD).

Recommendation 6.3. The Assembly should improve oversight of implementation of laws and regulations of the media.

Recommendation 6.4. The IMC should improve its oversight of implementation of laws and regulations of the media.

Recommendation 6.5. Kosovo's Assembly should amend the law on the public broadcaster (RTK), earmarking a percentage of RTK's budget for the Kosovo Press Council which would ensure its financial sustainability.

Recommendation 6.6. Civil society and the media should establish an internal dialogue with the aim of reaching consensus on necessary legal and regulatory reform.

INDEPENDENCE AND FINANCIAL TRANSPARENCY

When it comes to funding, Kosovo's media environment is neither sustainable nor transparent. According to the 2021 European Union Commission's annual report for Kosovo, the sector remains heavily dependent on donors and advertising, including from the government and political parties.⁵⁹ Media companies struggle to sustain themselves financially through commercial means. Several experts interviewed for this assessment pointed out that private broadcasters depend on non-commercial sources of funding and few are able to operate without strong links to political and business interest groups. There is a lack of data on the advertising market and financing remains largely non-transparent.

Lack of financial transparency

Most media do not publish information on their finances or ownership; therefore, information on media ownership structures, particularly for online media, is ambiguous or unknown. One representative of regulatory institutions explained *"Kosovo does not have clear and transparent rules when it comes to media ownership, incomes, revenues and financial*

⁵⁹ See [EU: Kosovo Report 2021](#), October 2021.

disclosures.” As a result, there is no information about what financial interests stand behind media companies, the risk of monopolization in the media market is high and the distribution of opportunities for financial resources is not done based on free-market principles. In July 2022, the EU Parliament noted that large-scale investments have led to increased private sector influence over the media, including “commercial and political blackmail.” The resolution calls for media transparency, including on media ownership.⁶⁰

Some interviewees emphasized that big companies and businesses close to or owned by politicians are buying or investing in online media, television companies, and network providers. The lack of financial and ownership transparency, as well as regulations in this regard leaves Kosovo highly vulnerable to the possibility of one company having a monopoly of the media market.

On the other hand, one journalist emphasized how it is unfair for the public broadcaster to receive public funding and still earn from commercial advertising. According to him, public media should not generate income from marketing and advertising and should leave that opportunity to the private media because it already has the advantage of having sustainable funding.

NDI’s April 2021 public opinion research shows that more than one-quarter of Kosovo’s population, 38 percent, believe that various media outlets publish false information because of financial gains and interest. Another 15 percent believe that the media is *somewhat* influenced, by stating that disinformation happens on purpose, in order to push an agenda, forward which is associated again with financial interests in the background. Some local media continue to be funded by international organizations, which enables them to be quite independent in the way they report and to criticize freely. According to one editor from the Serbian community, this *“business model of donor funding, however, is not likely sustainable as donors will not fund them indefinitely.”* All of the media representatives that were interviewed emphasized that international donors never imposed censorship or dictated any editorial policies.

Registered media that receive government funds are obliged to submit financial annual reports to the IMC. In explaining why Kosovo does not have financial transparency of the media, some of the editors in chief blame the IMC for not imposing stricter rules or regulating the system. One of them stated that *“even if you go to the list of registered media in IMC, you can see that the owners and editor’s information are often outdated and inaccurate.”* Some representatives of the institution claimed that *“data related to media found in the IMC are regarding their licenses which includes information on the owners, headquarters, address, etc.”* Another said that *“Behind the legal owners, which mostly are not regularly updated, there are other business interests which are not made public and, therefore, cannot be analyzed.”*

However, there is fear in the media community of being over-regulated, due to concerns that *“over-regulation can harm the public expression and freedom of the media, especially if it is done by politicians.”* A researcher told the assessment team that, except for RTK which is financed by the state budget, no one knows how the media is financed. *“Just recently, there was a new TV station launched in Kosovo with an investment of more than 10 million euros and nobody knows who stands behind them. It’s totally an unregulated field in terms of funding transparency.”*

⁶⁰ [European Parliament resolution](#) on the 2021 Commission Report on Kosovo, July 6, 2022.

Kosovo, together with North Macedonia, was listed by Facebook as one of the countries with troll farms producing a lot of disinformation and these trolls through Facebook were able to reach 140 million Americans and 360 million global users.⁶¹ This was mentioned also by one CSO interviewee claiming that *“financial interests are motivating our youth to get involved in troll farms and produce disinformation every time more and more.* ‘In Kosovo just recently, the feature of an Ad Library on Facebook was enabled. This means that everyone who will create a political, electoral, or social advertisement must go through the authorizations process. This will enable only people residing in Kosovo to run ads and the data will be publicly available for seven years. This mechanism brings transparency and offers insight about things that revolve around politics and campaigning.

Using social media to advertise is very cheap in Kosovo, making it very vulnerable to the rapid spread of disinformation. A public relations and marketing expert explained that *“with around 530 euros, a site can reach the whole population of Kosovo by making it possible to see the ad five times a day.”* A communications officer from a political party emphasized that *“there are small media groups with 4-5 people that create these types of content and many times blackmail politicians or companies to pay for banners and ads, in return for positive coverage or in return for not writing on their scandals.”* NDI research found that one of the main targets of information disorders is ethnic division which undermines democracy in Kosovo. *“The topics of disinformation with the financial background are mainly focused on national identity and dividing in ethnic identities, political parties, defense and security as well,”* a university professor told the assessment team.

Business influence

The lack of financing mechanisms for the privately financed media makes it overly dependent on political and business influence, while the lack of transparency enables those involved to promote their viewpoints, while obscuring these relationships. For instance, journalists and many online media often depend on financial support - or even employment - from political parties, and are therefore hindered from being objective.

NDI interviews revealed that business interests often dictate editorial policies. As one university professor noted, the media tends *“to find the golden middle, to not have bad cooperation with this or that business, or this or that political party. Given their financial situation, they are dependent on various businesses and advertising money. Behind the private media, there are people with strong economic power in the country.”* In some cases, the owners of large private companies that have economic ties with political parties, own media or news portals.

One of the main problems, one interviewee emphasized, is that the media in Kosovo is very closely tied to politically driven economic factors. A CSO representative said that *“politicians want to have their own media to go there and say whatever they want by not being challenged by panelists, opinionists and journalists. On the other side, the media wants some support from political parties because they get funds from them.”*

Another challenge is the lack of a sustainable income stream. *“We have this problem where journalists try to run the business and they’re not creating new innovative ways to generate*

⁶¹ See Massachusetts Institute of Technology (MIT) report, [Troll farms reached 140 million Americans a month on Facebook before 2020 election, internal report shows](#), September 2021. The report notes there were around 15,000 Facebook pages run out of Kosovo and Macedonia that had played a negative role in the 2016 US elections.

income.” According to one editor in chief, a solution may be training media owners on how to create new ways to generate money, such as subscriptions.

Some of the interviewees believe that when Kosovo gets a country code for the internet and membership in appropriate organizations and international institutions, there will be improvements in the business model for the media, through the ability to more predictably generate incomes. Internet codes are controlled by the Internet Corporation for Assigned Names and Numbers (ICANN) which limits provision of such codes to U.N. member countries.⁶² Another expressed the view that if the media can secure advertising from Google, Facebook, and other large social media companies, the media will start becoming more self-sustainable and more transparent.

Structural problems in this regard were also emphasized by an editor in chief of a news outlet. His views are that the intertwining of business and political interests reduces the integrity of information in the Kosovar context. When private enterprises with political interests pump money into online media, it creates a climate for facilitating political influence, as well as mushrooming of disinformation. *“You cannot find a direct line, but if you see from which businesses the media is financed, you’ll find that this business supports a political party.”* He pointed out that 30 million euros from Kosovo Telekom was used to purchase advertisements in more than 100 news portals, of which 20 are members of the Kosovo Press Council.

Political influence

As observed in NDI’s media monitoring and public opinion research, political parties play an active role in creating and spreading information disorders, especially during the electoral campaign times using Facebook groups and fan pages. This trend was notable in the aftermath of the vote of no confidence in March 2020. These groups, affiliated with political parties, promoted their parties’ work but also shared negative, and often manipulated, information against their opponents. A political spokesperson points out that *“some political parties create smear campaigns against some politicians just because they criticize them.”*

Such activities involved creating false narratives against opponents, spreading them through pages that act like online media, and calling for action in closed groups on Facebook. Interviewees mentioned examples, such as the case of Valdete Daka being accused of engaging in corruption, the former head of the Central Elections Commission (CEC), in illustrating what political parties can do in creating and shaping public discourse within just one day. In interviews, some of the party communication officers underscored these challenges, especially how parties lack the capacities in terms of staff, independence, and know-how to counter disinformation, much less prevent it. NDI/Kosovo’s media monitoring shows that political parties continue to engage in disinformation campaigns.

Most of the parties do not engage in disinformation activities through official channels, but rather indirectly through the creation of closed groups on Facebook. It is largely youth who engage by sharing, commenting and conducting negative campaigns which often contain hate speech elements against their opponents.⁶³ Two communication officers from different political parties told the assessment team how their party provides resources for these groups,

⁶² See <https://www.icann.org/>. The lack of recognition of Kosovo by the UN contributes to the fact that ICANN has not extended Kosovo an internet code. It relies on the International Organization for Standardization (ISO) which is guided by the UN Country Bulletins in extending internet codes.

⁶³ See NDI Kosovo, [Monitoring Online News and Social Media: Kosovo's February 14, 2021 Parliamentary Election](#) June, 2021.

such as computers, internet, office space, and fund party activities and false narratives on social media.

Political parties engage frequently in creating and disseminating hate speech and harsh language towards each other in closed social media groups in which hundreds of thousands are involved. According to communication officers interviewed, *“sometimes, party leaders and prominent political figures are involved directly in creating and spreading disinformation in the public discourse which is being presented in traditional and social media very rapidly.”* Therefore, most party representatives agree that there should be a code of conduct issued and monitored by the CEC and CSOs to help ensure that parties play fair during the electoral campaigns. Also, opinion-makers and journalists cater to political leaders by supporting them and helping them raise their public profile. *“Building such relationships can later be translated into a job position for them as political advisors,”* pointed out a CSO representative. One representative of a communication agency told the assessment team that this is happening because, throughout the years, parties have failed to create communication departments which would develop protocols on communication and develop a professional staff. *“The majority of the parties always hire communication and social media agencies to do the communication for them and not necessarily always have the needed political sensitivity and they are usually driven by the numbers and money on measuring the success of their campaign.”* According to a party communication officer, sometimes such agencies are involved in creating, shaping and spreading negative campaigns for parties.

A chief editor emphasized that the media directors engage in politics, or become part of political parties. *“You can see big companies that dictate even editorial policies. These companies are controlled through tenders and indirectly by politicians.”*

Social networks are becoming the next online environment after micro-environments, such as families and friends, to discuss politics. According to NDI’s regional poll,⁶⁴ almost 40 percent of people followed or joined a political discussion through social media. Therefore, parties should prepare and develop new digital communication strategies and information integrity protocols for online communication. For instance, one political party spokesperson said: *“Everything has shifted to social networks. There’s no party or anybody that can control the social network. The news when it’s published can’t be controlled. Even in the cases when false information needs to be denied, we think it’s best not to react because we think it will only get bigger.”* NDI’s poll also showed that 39 percent of Kosovo's citizens often follow and/or join political discussions on social networks, while 37 percent do so rarely. Meanwhile, 47 percent of them often discuss politics with their families, while 43 percent rarely discuss politics with their families.

A local Serb journalist commented that the government seeks to buy influence in the media. *“There is the problem that the government gives money to portals to promote the work of this or that ministry. The government structure gives money to media portals through different shady applications.”* Further investigation into the transparency of spending public funds in this area is needed.

⁶⁴ See NDI, [Between East and West: Democracy, Disinformation and Geopolitics](#), July, 2021.

EU standards on financial transparency of the media

As one local Serb journalist emphasized, there is no jurisdiction over news portals and no consequences for spreading disinformation. As explained above, there also is little financial transparency. He said that the problem is structural, “*with 200 euros, you can open a news portal and write what you want... [there is]no media body which can control [the media].*”

The financing of Kosovo’s media should be brought in line with European Union best practices and standards, such as the European Council Convention on Human Rights,⁶⁵ EU Code of Practice on Disinformation,⁶⁶ the Digital Services Act package,⁶⁷ and the Audiovisual Media Services Directive.⁶⁸ Such standards would have an impact on improving media independence, reducing political and business influence, and enabling media companies to have more equal access to financial resources. The most sustainable media model would be one financed directly from citizens through subscription, although it is very difficult to implement subscriptions now, given the current state of media literacy and weak economy in Kosovo. Most interviewees mentioned the EU offers a good model that would help Kosovo to cultivate professional journalism as it is in developed countries. “*You can’t expect our media and journalists to report like the Guardian and pay zero cents for that work,*” said one editor in chief.

Targeted transparency recommendations

Independence and financial transparency

Recommendation 7.1. The Assembly should pass legislation, in line with EU best practices and standards, requiring the public disclosure and full transparency of the ownership and beneficiaries of entities that own and control the media. The process must include consultation with the media and civil society.

Recommendation 7.2. Until such legislation is passed, the media should voluntarily publicly disclose financial information, ownership, and advertising revenue. The well-established media should lead the way and encourage others to do so.

Recommendation 7.3. The CEC should establish regulations for clear and transparent public disclosure of political parties expenditures for marketing in social media platforms for electoral campaigns.

Recommendation 7.4. The IMC and PCK, working with civil society, should create a publicly available, continuously updated database of owners of all relevant media, in coordination with Reporters Without Borders in applying the [Media Ownership Monitor](#) mechanism.

Recommendation 7.5. Kosovo’s executive branch, with support from the international community, especially the US, should prioritize obtaining Kosovo’s own code for the internet.

⁶⁵ Council of Europe, [European Convention on Human Rights](#), 1950-2020.

⁶⁶ European Commission, [Code of Practice on Disinformation](#), 2022.

⁶⁷ European Commission, [The Digital Services Act package](#), 2020.

⁶⁸ The European Parliament and the Council of the European Union, [Directive\(EU\) 2018/1808 of the European Parliament and of the Council](#), November 2018.

INFORMATION INTEGRITY

The majority of experts from different fields interviewed for this assessment agreed that there is disinformation activity in Kosovo's media landscape. NDI's media monitoring found that Kosovo's media environment contained false information on the COVID-19 pandemic, harsh language which exacerbated political tensions among the parties, and misogyny.

They agree that traditional media in Kosovo is not considered the primary producer or spreader of information disorders; rather, disinformation is most prevalent in portals on social media. A university professor explained that this is because traditional media still follows established editorial oversight of and professional reporting. Nevertheless, in cases where disinformation is present in traditional media, it is rapidly spread in online media. NDI research shows that, in cases where disinformation in traditional media, it rapidly spreads in online media.

While acknowledging the benefits of the emergence of online media, one news director interviewed highlighted the challenges that come with it. *"In Kosovo, there are good TV stations, and you can see a lot of new news portals and news comes faster to the audience. But the risk is always that online platforms are not the most reliable source of information because they always run towards reaching more audiences and publishing news faster. The journalism performed by news portals is not at the level that we professionals would like it to be. Do citizens win? Yes, they do. Do they get fake news? Yes, they do."* A media expert compared the before and after of, as she referred to, *"the explosion of the online world,"* pointing out that the main impact is that now it is almost impossible to control information. *"Now, it's much more difficult to censure or control disinformation. Sources will find a way to publish the story and then you have the media which picks up the story and shares it in their outlets and platforms."*

Facebook is the most prominent social media in Kosovo, as well as the one with the highest presence of information disorders. Disinformation is easily spread on Facebook, as it can reach a lot of people within a short timeframe with a very small amount of money. A university professor emphasized that the *"first source of disinformation in Kosovo is Facebook. Second are online media/ portals that are many times more anonymous and which pop up usually during particular processes. And the third one is friends and family members. The third one has to do with WhatsApp and Viber where you don't get disinformation from the media but from friends and family."*

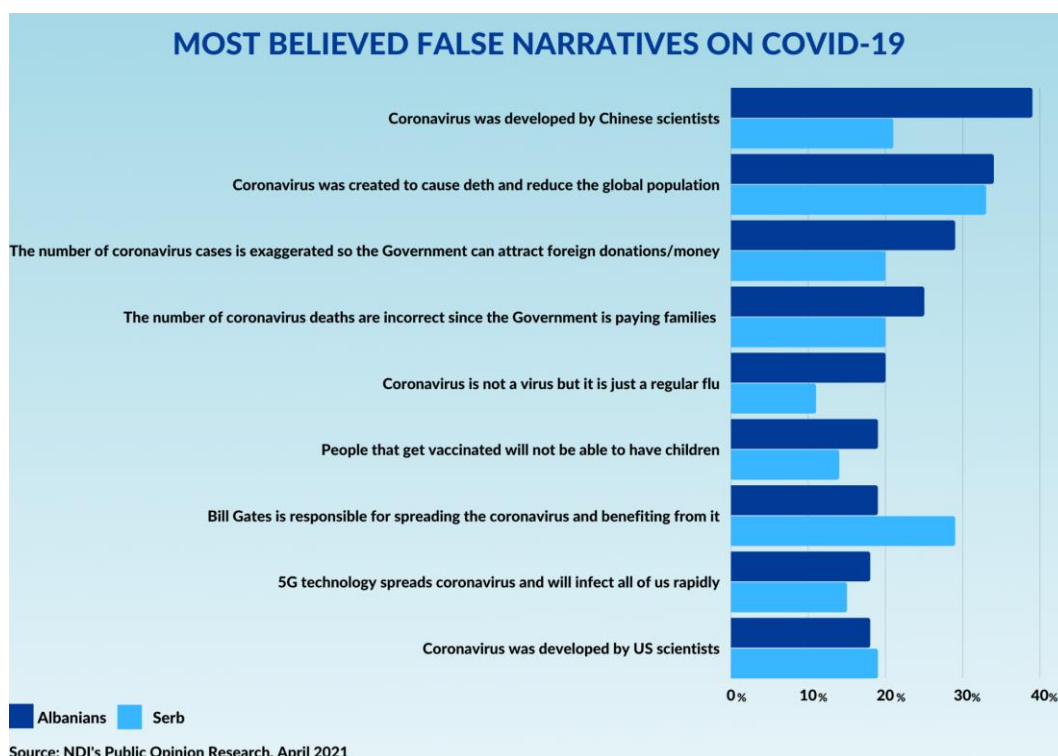
Online media also offers unprecedented possibilities for interaction with audiences, but they are also at risk of disinformation. A journalist interviewed for this assessment pointed out the disinformation phenomena in Facebook pages, groups, and online media are usually created for financial gain *"They are created with only one purpose: to spread disinformation and make money from that."* NDI's media monitoring research found that Facebook groups and fan pages have been increasingly spreading disinformation, especially during election periods. These groups, affiliated with political parties, promoted their parties' work but also shared negative and often manipulated information against their opponents. A political spokesperson points out that *"some political parties create smear campaigns against some politicians just because they criticize them."*

NDI's public opinion research shows that nearly three-quarters of the population believe that news portals regularly or occasionally report false information stories.⁶⁹ Yet, large percentages of the population still believe the false narratives, impacting the public opinions of Kosovo's

⁶⁹ See [NDI Kosovo Public Opinion Poll](#), April 2021.

citizens. For instance, NDI’s April 2021 public opinion research shows that some false narratives on COVID-19 were believed by nearly 40 percent of the population. Additionally, a representative of the Association of Journalists of Kosovo explained how widely sensational disinformation can spread *"in one of the closed groups on Facebook, there was a post in which it said that there's a Roma woman that is kidnapping children and the woman got beaten within 2 hours by people who saw that news."* Whether intentional or inadvertent, the widespread sharing of disinformation means citizens are not accessing accurate and factual information. This has an impact on how they elect their representatives and hold their governments accountable and thus threatens Kosovo’s democracy.

The table below, “Most believed false narratives on COVID-19,” shows that some false narratives on COVID-19 were believed by one-third of the citizens. In some cases, there is a difference in beliefs between Albanian and Serb communities. For instance, 39 percent of Albanian respondents believe Chinese scientists are responsible for the virus, while 21 percent of the Serb community does. A higher percentage of Kosovo Serbs, 29 percent, believe that Bill Gates is responsible for the virus, compared to 19 percent of Kosovo Albanians. These divergent views reflect the influence of external actors as described in section below on external influence.



Political division/harsh language

Among information disorders in Kosovo’s media environment, there is a considerable amount of harsh language that contributes to political division. Political parties and leaders are part of such disorders - as producers and victims. NDI’s media monitoring research found that political developments - snap elections, the Dialogue between Kosovo and Serbia, the indictment of Kosovo’s political leaders by the Special Court - triggered harsh public rhetoric and offensive language, as well as skewed or false narratives. The media also contributed to this by creating and sharing false information without fact checking. Additionally, they used third-party

opinions as a way of deflecting responsibility for claims in articles. Some portals passed on unverified rumors without acknowledging the content as rumor. Social media, as well, played a considerable role in promoting information disorders.

Skewed and false narratives on the political situation had an impact on the public opinions of Kosovo citizens. According to NDI's April 2021 public opinion research, the narrative that "Valdete Daka was responsible for declining and decreasing diaspora votes" is believed by 31 percent of the population; 29 percent believe that Daka is corrupt and part of the Pronto Klan and 28 percent consider her to be responsible for not certifying the candidate list of LVV, including Albin Kurti. One of the most widely circulated narratives were skewed narratives relating to the Constitutional Court's decision and the CEC's implementation of the ruling denying the eligibility of some candidates, including Albin Kurti's, on the basis of prior convictions, which, while in line with Kosovo law, had not been previously enforced. Other false narratives were that "Vjosa Osmani is controlled by Albin Kurti," which is believed by 21 percent; 19 percent believe that Albin Kurti is a Communist; 17 percent believe that Albin Kurti is anti-American and 7 percent believe that Vjosa Osmani's family has ties with Russia and Serbia.

Misogyny and inflammatory language

Misogyny is a particular challenge in Kosovo's media environment. Women were frequent targets of biased, sexist, or manipulated language. Such misogynistic language and attacks were covered and shared among the country's traditional and social media, often without being identified as such. NDI's media monitoring report showed that women in leadership positions were subject to verbal attacks for their political positions, their appearances and also were subject to sexist language. Much of the observed language constitutes online violence against women in politics.⁷⁰ NDI research found that the impact of this online violence has a chilling effect on the political ambitions and engagement of women and girls, decreasing their involvement in politics and public life. A global survey of 14,000 girls in 22 countries found that 98% use social media, and half reported being attacked for their opinions before they were old enough to vote. As a result, in some countries, almost 20% of respondents stopped posting their opinions.⁷¹

Additionally, some of the key takeaways from the panel discussion "Online and social media disinformation in Kosovo" during NDI's DISICON Conference in June 2021 were the need for the media to portray misogyny as such in their reporting and to raise awareness about such inflammatory language.⁷² Challenges in women's representation in the media were also emphasized, including the lack of women in managerial positions within the media companies, such as directors, editors in chief, editors.

The negative portrayal of women in the media poses an added challenge for women's electoral success. For instance, President Vjosa Osmani was the primary subject of attacks, according to NDI's research. She faced criticism of her cooperation with Albin Kurti, her purchase of a house, allegations of disloyalty to her party, LDK, and criticism of her personal appearance. NDI/Kosovo public opinion research from April 2021 showed that 38 percent of Kosovo's citizens believe that violence against women hinders their participation in politics, although attitudes have improved since November 2020 when 51 percent thought so. In addition, 38

⁷⁰ See NDI's report, [Not the Cost: Program Guidance for Stopping Violence Against Women in Politics](#).

⁷¹ See NDI's report, [Tweets that Chill](#).

⁷² See National Democratic Institute NDI report, [Information Integrity Conference - DISICON](#), October 2021.

percent of the population in Kosovo believe that the negative portrayal of women in the media poses an added obstacle for women's electoral success, down from 49 percent in November, 2020. There is also a difference in perspectives among genders. For instance, only 33 percent of men believe that the negative portrayal of women in the media poses an added obstacle for women's electoral success, while 42 percent of women do.

A journalist interviewed for this assessment drew attention to women's representation in the media, labeling it as problematic. *"Women are twice underrepresented in general: first from and within their parties and then from the media. It's very visible also during the campaign when you see most of the debate speakers being just men like they are the smartest and the only ones capable of presenting party messages."* One editor in chief underscored the lack of equal treatment and representation of women in the media. *"Men are dominating the debates, the public agenda, the media, and the political structure... We see many times some type of offense like "you are acting like a woman" in debates in the media."*

Violence against women in politics (VAW-P) can take many forms, including online, physical, psychological, and sexual violence. NDI's report "Kosovo's Vibrant Democracy: Closing the Deficit in Women's Full Participation," shows that online violence against women was particularly present against women candidates in the February snap elections of 2021.⁷³ NDI's public opinion research shows that 25 percent of the Serbian community believe that online harassment targets women more and discourages their political participation, while 36 percent of Albanians share this view. Furthermore, the media plays an important role by exacerbating and amplifying psychological violence against women in politics. According to this poll, this mostly happens because the media want to gain likes on their social platforms.

Foreign influence

The online and social media monitoring of NDI Kosovo found narratives with information disorders, skewed, and harsh narratives from Serbia, Russia, China, and Turkey that were shared in Kosovo, at times feeding political divisions in Kosovo. While mostly accurately reporting the news from abroad, the media did not make clear which news items came from outside Kosovo and failed to note when the statements were skewed or not factual. The EU Parliament has expressed alarm that the Western Balkans are being hit "particularly hard by foreign interference and disinformation campaigns originating from Russia and China."⁷⁴

A large amount of false information produced in the Serbian language is directly linked to Belgrade-based media and institutions. In addition, the Russian news state agency *Sputnik* is present in the region with its branch in Belgrade producing news in Serbian targeting the entire region. The EU parliament has condemned the long running disinformation campaigns by Russia's outlet *Sputnik Serbia*, which sow ethnic tensions, attempt to delegitimize Kosovo's statehood, destabilize its governance and undermine Kosovo's relations with the EU.⁷⁵ One representative of a CSO commented that *"There is foreign influence from Russia and Turkey and disinformation mostly is spread from these kinds of small scales of Facebook groups and pages."* According to one journalist, most of the media in Serbia is part of this campaign, which portrays Albanians as "bad people" with whom you cannot live, promoting interethnic hate.

⁷³ See NDI's Assessment, [Kosovo's Vibrant Democracy: Closing the deficit in women's full participation](#), July 2021.

⁷⁴ [European Parliament resolution](#) on the 2021 Commission Report on Kosovo, July 6, 2022.

⁷⁵ Ibid.

This influences the Serbian community in Kosovo which is mostly following Serbian language media. NDI research shows that the majority of Serbia-based media spreads such narratives.

According to NDI's research, the articles containing information disorders produced by foreign sources, such as those from Russia or Turkey, spread widely and quickly outside of Kosovo, while in Kosovo, they took longer to be reproduced. For instance, Kosovo-based articles posted on Facebook or online news portals took less than 90 minutes to spread to at least five other portals or Facebook accounts inside Kosovo, while articles from outside of Kosovo not in the Albanian language, such as from Russia and Turkey, took an average of seven days to spread into Kosovo's domestic-based media. In addition, some interviewees said some portals are created in North Macedonia that are active in sharing content in Kosovo.

Sputnik has influence in the Serbian community because it produces content in Serbian language, according to a Serbian journalist from Kosovo. For instance, "*Kosovo Online*" is one of the mediums heavily funded by the government of Serbia. This media was created with the intention of limiting the influence of local news portals and controlling the flow of information to Serbian communities. According to one editor in chief and university professor "*If Sputnik wants to increase their influence through social media channels, they can do that easily due to the fragility of Kosovo; but currently, there is a lot more interest in Serbia rather than Kosovo.*"

NDI's public opinion research showed that such skewed narratives coming from Russia have an impact on citizens' opinions and perceptions.⁷⁶ False narratives such as "Russia entered Ukraine to stop the genocide of Russian people there" is believed by 11 percent of the overall population – 52 percent from the Serbian community and 9 percent from the Albanian community. Meanwhile, 20 percent of the overall population - 19 percent from the Albanian community and 49 percent from the Serbian community – believe that the U.S and NATO do not have the legitimacy to criticize Russia's actions in Ukraine.

With its monitoring, NDI found that the Serbian government regularly promoted false narratives about the intentions of the West. During the snap February 2021 elections, Serbia called for voters to support the Serbian List, spreading false and biased information about the Dialogue and the Washington Agreement. One of the chief editors expressed concern that journalists consider *Sputnik* or *Russia Today* good sources among the media outlets.

According to one journalist, funding from Turkey is being used to support portals in Kosovo to produce information that promotes Erdogan as a powerful politician with a strong army and the special connection between Albanians and the Ottoman empire. "*They are trying to promote how well Erdogan has governed Turkey, but at the same time trying to change history with fake news regarding the Ottoman Empire in the Balkans.*"

Some interviewees said that China is present in the region and has sponsored positive articles about the success of China. China has also promoted numerous stories regarding its culture and travel opportunities. "*You have in Kosovo money that came from China as well, just in a different approach compared to others,*" according to one person interviewed.

NDI's polling shows that Kosovo Albanians have more favorable opinions towards the US than do Kosovo Serbs. On a scale of 1-5 where 1 is negative and 5 is positive, Kosovo Albanians favor NATO and the U.S at 4.8, the EU at 4.0, Turkey at 3.7, China at 1.4 and Russia at 1.3. Meanwhile, for Kosovo Serbs, Russia is most favorable at 3.7, China at 3.5, EU at 2.6, Turkey at 2.1, U.S at 1.8 and NATO at 1.6.

⁷⁶ National Democratic Institute report, NDI Public Opinion Poll, April 2022.

Regarding foreign influence on the political parties and campaigns in Kosovo, political leaders, CSOs, and the media portrays the Serbian List as being created and managed directly by the Government of Serbia. Most chief editors and journalists interviewed emphasized the lack of access by Kosovo Serbs as creating fertile ground for direct influence coming from Russia given its presence in Belgrade and the creation of content in the Serbian language.

[Targeted information integrity recommendations](#)

Information integrity

Recommendation 8.1. The executive branch should establish mechanisms and develop plans to raise awareness of and address the threats of external influence in Kosovo’s media environment, in accordance with the EU’s standards and best practices, such as the Cybersecurity Strategy and NIS Directive of the EU.

Recommendation 8.2. The media should establish internal guidelines to identify harsh and misogynistic language, as well as set standards for reporting on sexist stereotypes and gender-based violence and refuse “mannels.”

Recommendation 8.3. The media should establish clear ethical reporting and proactive editorial policies for monitoring, detecting and fighting disinformation, and increasing capacities for fact-checking, professional development and sharing best practices.

Recommendation 8.4. Political parties should develop internal rules and protocols for information disorders activities, including refraining from inflammatory language and disinformation campaigns, addressing violence against women in politics, and hate speech, and creating cyber security protocols and addressing.

Recommendation 8.5. The CEC should develop a code of conduct for parties or declaration of principles by creating norms and standards for political parties, candidates, media and the electorate at large that promote the integrity of the information environment around elections.

Recommendation 8.6. The IMC should increase the availability of data in the audiovisual market, especially when it comes to media ownership.

Recommendation 8.7. Civil society should raise capacities to monitor, fact-check, raise awareness, and combat disinformation campaigns.

Recommendation 8.8. Civil society should create an open platform that can share best practices and gather regional stakeholders to share best practices with the goal of developing a regional approach to maintain information integrity.

THE WAY FORWARD

Information integrity is critical to the ability of citizens in a democracy to hold the government accountable on the basis of timely, accurate information. Kosovo, with the highest internet penetration in the Western Balkans, faces a growing threat to its democracy from information disorders. Since independence in 2008, Kosovo has made great strides in developing strong democratic institutions. However, the country faces deep partisan divides, unresolved ethnic

tensions, the marginalization of women, frequent electoral campaigns, and low government responsiveness to citizens' concerns. This environment makes Kosovo susceptible to anti-democratic narratives which spread quickly and widely, affecting public opinion.

To strengthen transparent, responsive, and accountable governance in Kosovo, it is important to identify threats to Kosovo's democratic information environment, increase resilience to these threats, and build tools with our partners to advance systemic responses for a stronger information environment for all of Kosovo's citizens. This assessment points the way toward that goal in several key areas.

The challenges of developing media standards in line with those of the European Union will require the collaboration of many stakeholders. It is therefore important for Kosovo to have fora for dialogue with all of the stakeholders, so that they can work toward consensus on ways to prevent and mitigate information disorders, foreign influence, and cybersecurity breaches in line with European Union standards. On the frontline of these challenges, Kosovo is well placed to serve as a hub for regional coordination on shared experiences. Creating a network of organizations and institutions in similar contexts facing similar challenges is important in finding comprehensive solutions in the face of cross-border threats in this intimately connected region and beyond.

Kosovo also needs greater media literacy, and the education system is a critical foundation for it. A strong media literacy initiative will also require multi-stakeholder collaboration, ideally with the Ministry of Education, civil society, media, and other experts. Such programs will be crucial in creating sustainable solutions for Kosovo's future resilience to information disorders.

In all of these initiatives, civil society has a critical role to play. It needs enhanced capacities to monitor the information environment and offer evidence-based insight into systematic and sustainable solutions for a democratic information environment.

It is a society-wide effort that is needed to ensure Kosovo's citizens have access to timely, accurate, and non-harmful information—in turn an essential foundation to ensuring its vibrant democracy.

METHODOLOGY

NDI carried out this assessment of Kosovo's media landscape from November 2020 to July 2022 to understand the state of media and journalism, threats to information integrity, the legal and regulatory framework, and interventions needed to address challenges presented in those areas. The assessment team was led by NDI's Senior Country Director Nancy Soderberg, Senior Program Manager Pajtim Gashi and Program Officer Adea Beqaj. It appreciates the research and analyses contributed by Victor Breiner, Disinformation Analyst and Cybersecurity expert, Arta Berisha, a journalist, and Abit Hoxha, a university researcher.

This assessment used a variety of methodologies, including interviews, an online questionnaire, public opinion research, expert discussions and workshops during NDI's information integrity conferences, and desk research. The research also draws on NDI's extensive work in this field. In 2018, NDI launched its global [INFOTEGRITY](#) framework to draw on experts and front-line practitioners to scale up responses to disinformation in its democracy and governance programming. In 2019, using this framework, NDI began to glean a detailed understanding of patterns within the information environment in Kosovo, and to determine indications of new or escalating campaigns to manipulate information or to advance harmful speech. NDI desk

research and public opinion polling since 2019 has found a robust domestic marketplace for disinformation. Three conferences on information integrity in Kosovo provided important information on the challenges to Kosovo's information integrity. Summaries of the first two can be found here: [DISICON 2019](#), [DISCON 2021](#) and [DISICON 2022](#).

This assessment included:

Individual Interviews: The assessment team conducted 27 interviews during November and December 2020 with journalists, editors, editors in chief, academics, researchers, experts on technology and media law, as well as representatives from regulatory institutions, political parties and NGOs. The interviews centered on seven main topics: media ecosystem transformation, financial and ownership transparency, legal and regulatory framework, information disorders relating to COVID-19, political division and misogyny, foreign influence, and media literacy. The assessment team was careful to ensure balanced representation from across the political spectrum, as well as representation from across ethnic groups. Interviews were conducted in Albanian, Serbian, and English.

Out of 27 interviews conducted, three interviewees were from the Serbian community. Eighteen were men and nine were women, including: four editors in chief, four journalists, four communications officers from political parties, three representatives from civil society, two representatives from regulatory institutions, two technology experts, two public relations and marketing experts, two university professors, one researcher in the field of media and journalism, one editor, one sociologist and one media lawyer.

Online Questionnaire: Following the online interviews, the assessment team conducted an anonymous online survey with the interviewees to gather additional information, particularly sensitive information that participants may have been hesitant to divulge in an interview format.

Public Opinion Research: In 2021 and 2022, NDI carried out public opinion research, including three polls. The polls included face-to-face interviews with respondents over the age of 18 and a stratified random sample (by region, settlement type, gender, and ethnicity), conducted using a random walk technique, although the youth poll included those between the ages of 16-29. Weighting was implemented in order for the final results to reflect the structure of the population in terms of ethnicity and age-group. The April [2021](#) poll included 1,700 respondents and the 2022 poll included 1,200. The youth poll was conducted in November and December, 2021 and included all communities with a sample of 3,100 respondents, boosted for minority community samples. NDI also drew upon its [2021 regional public opinion poll](#) conducted with similar methods across seven countries in Central and Southeastern Europe.

Desk Research: NDI supplemented the above methods with in-depth desk research from November 2020-July 2022, including a detailed review of international and national reports on the media environment in Kosovo, Kosovo's legal and regulatory framework, and EU acts and strategies related to media and information. The report also draws upon the findings of NDI's media monitoring and analysis, as well as discussions held during its three information integrity "DISICON" conferences.

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