



# Digitalization and Democracy in the Western Balkans



Aspen Western Balkans Initiative  
Engagement for Progress and Stability

Aspen Institute  Germany

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## Foreword

The future of the Western Balkans is within the European Union. It is therefore important that reform efforts are further intensified and that the outstanding reforms are addressed with determination. Striking the right balance between supporting enlargement and ensuring that the necessary criteria are met remains a priority. By emphasizing the principles of democracy, rule of law, economic cooperation and shared responsibility, Germany remains determined to drive the enlargement process forward while upholding the norms and values that define the European Union.

Digitalization is a key aspect of the democratization process in the Western Balkans, bringing positive changes but also posing major challenges. The European Commission has launched the Digital Agenda for the Western Balkans to reap the benefits of faster economic growth and improved services. Joint efforts, such as Digital Summits, underline the region's commitment to digitalization. However, rapid digitalization and increasing cyber threats make it necessary to focus on strengthening cyber resilience. The region faces the multiple challenge of creating a solid legal framework and institutions as well as capacity building for digital technologies.

In the media landscape, digitalization has revolutionized the dissemination of information, but also poses challenges such as limited space for independent journalism, lack of transparency and political influence. Disinformation campaigns and politically motivated fake news on social media are threats to democracy. Hate speech increases social tensions, exacerbates division, and contributes to instability. Tackling these problems requires the engagement of both state and non-state actors to promote constructive solutions.

The intersection of digitalization and democratization in the Western Balkans is complex and multi-layered. While digital technologies offer immense potential for positive change, addressing challenges such as cybersecurity, preserving media freedom, and combating disinformation is crucial to ensure that democrat-

ic development in the region remains on a stable and inclusive path. This publication offers an insightful contribution from individual experts on this topic.

The conference, which I also attended, was part of the two-year project “Aspen Western Balkans Initiative: Engagement for Progress and Stability”. I was particularly impressed by the professionalism and dedication of the regional experts from various backgrounds.

I am also grateful to the new Government of Montenegro: Only some days after his confirmation in office, Foreign Minister Filip Ivanović and his team hosted this conference, helped organize it by short notice, participated actively and contributed grateously. I flew back to Berlin with a clear notion that this government is both willing and capable of tackling any kind of challenges on Montenegro's way into the European Union. I wish you well – keep this can-do-mentality !

I express my gratitude to the Aspen Institute Germany for a fruitful year of collaboration, encompassing the coordination of various events, including the “Democratization and Democracy” conference held in Podgorica. The German Federal Foreign Office values the importance of ongoing dialogue and exchange of ideas. It is truly gratifying that the Aspen Institute Germany has played an important role in fostering such an environment with this project. Its aim is to promote dialogue and cooperation in the Western Balkans and to develop concrete recommendations for the enlargement and reform process. The project is also intended to counteract the “EU fatigue” that has spread in parts of the region. We look forward to continued collaboration with the Aspen Institute Germany in 2024.



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## Introduction

The Russian war of aggression on Ukraine has significantly changed the geopolitical situation in Europe. In the past year, the geopolitical awakening of the EU has also led to a new dynamic in the enlargement process: the European Council made the decision to open accession negotiations with Ukraine and Moldova and with Bosnia and Herzegovina, “once the necessary degree of compliance with the membership criteria is achieved”.<sup>1</sup> Georgia was also added to the list of candidate countries. President of the European Council Charles Michel even introduced a concrete date at last year’s Bled Strategic Forum: “I believe we must be ready – on both sides – by 2030 to enlarge.”<sup>2</sup> Nevertheless, the Western Balkans still have a way to go. Reforms on the rule of law are lagging, and democratic processes still need to be strengthened in many ways.

In the ever-evolving landscape of global affairs, the Western Balkans stand at the crossroads of historical legacies, geopolitical shifts, and the transformative power of digitalization. Digital developments increasingly influence the core aspects of democratic life. They can strengthen democratic processes and improve social participation, inclusion, and equality. Alternatively, they can undermine democratic institutions and reinforce social inequalities. Different approaches are therefore needed to successfully shape the interplay between democracy and digitalization. Policy and regulatory challenges such as data protection or the promotion of political digital media competence are central aspects.

On December 11-14, 2023, the Aspen Institute Germany in cooperation with the Ministry of Foreign Affairs of Montenegro organized a conference titled “Digitalization and Democracy” in Podgorica. The aim of this conference was to offer a platform for high-level participants from the Western Balkans, Germany, the EU, and international and

regional organizations to discuss and identify central challenges and opportunities of digitalization in the Western Balkans. This publication provides an overview of the recommendations developed at the conference as well as the input papers that guided the discussions, written by civil society experts and academic researchers. All statements of facts and expressions of opinion contained in this publication are the sole responsibility of the author(s) and do not necessarily reflect the position of Aspen Germany or the German Federal Foreign Office.

We would like to thank the German Federal Foreign Office for its generous financial support of the “Aspen Western Balkans Initiative: Engagement for Progress and Stability”. We also owe thanks to the Ministry of Foreign Affairs of Montenegro for the excellent collaboration in co-organizing the conference in Podgorica. Finally, we are grateful to all participants whose insightful contributions created a fruitful exchange and, in particular, to all authors of input papers for contributing substantially with their expertise and for providing thought-provoking insights for discussion. Finally, we would like to thank Kilian Kurtenacker and Maren Sass for their contributions to the editing process of this publication.

We hope you enjoy reading this publication, and we look forward to continuing our commitment to the Western Balkans.



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1 European Commission, European Neighbourhood Policy and Enlargement Negotiations (DG NEAR). Bosnia and Herzegovina, [https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/bosnia-and-herzegovina\\_en](https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/bosnia-and-herzegovina_en) (accessed January 10, 2024).  
2 European Council of the European Union, Speech by President Charles Michel at the Bled Strategic Forum. <https://www.consilium.europa.eu/en/press/press-releases/2023/08/28/speech-by-president-charles-michel-at-the-bled-strategic-forum/> (accessed January 10, 2024).

# Conference Summary: Digitalization and Democracy in the Western Balkans

Maren Sass

## Setting the Stage

Digitalization is forever transforming the way we communicate, work, do business, conduct research, or educate the next generation. The European Union (EU) is currently in its ‘Digital Decade’, with a series of concrete targets and objectives for 2030 to boost digital public services, drive the digital transformation of businesses, secure digital infrastructures, and elevate digital skills for a human-centered digital future.<sup>1</sup> As the Western Balkan (WB) nations continue working to converge more closely with EU nations, the role of digitalization in safeguarding democratic values will take on an increasingly important role.

To explore ways forward in this, on December 11-14, 2023, the Aspen Institute Germany held a conference on *Digitalization and Democracy* in Podgorica, Montenegro. Supported by the German Federal Foreign Office and in cooperation with the Ministry of Foreign Affairs of Montenegro, the conference brought together expert opinions from civil society, media, research, and policymaking to discuss the various ways that digital technologies are affecting democracies in the Western Balkan region. To allow for an open and earnest debate, talks were held under the Chatham House Rule, which stipulates that all conversations are confidential, and that any content of what is said may only be shared publicly if it is not attributable to the speaker. Debates were lively and brought together many constructive recommendations across a wide array of topics. This paper summarizes the key challenges identified as well as recommendations that discussants developed.

- To begin, participants examined in the session *Digitalization as Part of the Democratization Process* the ways in which digital developments could contribute to strengthening or undermining democracies in the Western Balkans, and what roadblocks must be cleared to use digital technologies to the benefit of citizens and their governments.
- Following this, the session *Democratization in the Context of the EU Enlargement Process* took a closer look at the renewed momentum in the EU to integrate further members into the union, and explored how this might best be utilized to inject fresh impetus in WB reform efforts as the EU embarks on its new approach of gradual integration.
- Next, the session *Digital Transformation and Its Role in the Economic Development in the Region* focused on the many ways that the digital transformation might be harnessed in WB countries to benefit economic development in the region and what challenges lie ahead when embracing digital technologies.
- In the subsequent discussion on *Cyberresilience and Cybersecurity* a number of recommendations were developed on how to safeguard democratic processes and structures by effectively strengthening collective cyberresilience in the entire WB region.
- Similarly, talks on *Media Freedom and Its Importance for the Democratization Process* produced a series of recommendations on how to foster independent media as a crucial pillar for sustainable democracies.
- The final topic, *Hate Speech and Disinformation as a Major Threat to Democracy* saw spirited discussions on how disinformation might

<sup>1</sup> European Commission, Europe’s Digital Decade. Digital Targets for 2030, [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/europes-digital-decade-digital-targets-2030\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/europes-digital-decade-digital-targets-2030_en) (accessed December 22, 2023).

be effectively countered, particularly given new technological advancements in artificial intelligence (AI).

Aspen Germany was honored to organize these workshops and present the many creative ideas they brought forth. These conferences are not only meant to collect thoughts and proposals, but also to enable experts from various fields and pillars of society to build new bridges and expand their connections across the WB6. The EU is currently experiencing a “magic moment” as more momentum is gathering to push forward reforms after years of inertia. While EU accession is a technical process, there is also an element of magic inherent in the promise of peace, prosperity, and stability that comes from EU membership. At the fourth annual summit between EU and WB leaders in Brussels on December 13, 2023, European leaders clearly stated that “[t]he future of the Western Balkans is in our Union.”<sup>2</sup> The importance of the Western Balkans for the EU reaches beyond geopolitical reasoning or strategic cooperation, and touches upon shared values and principles within the European family. Harnessing this sentiment will be the key to completing the EU accession process for the remaining WB nations.

### Digitalization as Part of the Democratization Process

The pace of digital development is picking up, and digital technologies are increasingly influencing core aspects of democratic life. From voting to law enforcement, to citizen engagement, to social services – digitalization is transforming governance around the world.

Digitalization is widely understood to be the “transformation of the socioeconomic environment through processes of digital artifact adoption, application, and utilization,”<sup>3</sup> leading to new business

opportunities and industries, among other things. In the public sphere, it can transform governmental modes of operation and provide novel e-Government services.

From a positive perspective, digital tools have the potential to dramatically improve democratic processes, bolstering communication, fostering transparency, encouraging civic engagement, and generally reducing costs of governance. Digital tools can also help hold governments more accountable, increasing the power of civil society watchdogs, and making governance more accessible, open, fair, and responsive. Availability and access to public services can be improved. And corruption can be fought more effectively.<sup>4</sup>

However, the potential drawbacks of digital tools are also considerable. There is no guarantee that digital tools improve governance automatically. Quite the contrary, poorly managed digitalization can further erode political accountability where it is already low or under threat. Data-driven algorithmic models can undermine privacy or encode social inequalities (in particular, if data is insufficient or biased). Public officials often have limited knowledge of the digital tools they employ, and government institutions are struggling to keep pace with the digital revolution. If digitalization is not managed well, trust in public institutions, which is often already low, can further decrease.<sup>5</sup> In addition, badly managed digitalization can advance disinformation, threaten media independence, and negatively influence electoral preferences, fueling societal conflicts and polarization. Not least, it can also make governments more vulnerable to cyberattacks from domestic and foreign actors.

The Organisation for Economic Co-operation and Development (OECD) identifies digitalization as one of five primary policy areas, or “clusters”,

2 EU-Western Balkans Summit, Brussels Declaration, December 13, 2023, <https://www.consilium.europa.eu/media/68822/brussels-declaration-en.pdf> (accessed December 22, 2023).

3 Maria Gradillas and Llewellyn Thomas, “Distinguishing Digitization and Digitalization. A Systematic Review and Conceptual Framework,” in: *Journal of Product Innovation Management*, May 28, 2023.

4 Beth Kerley, “Editor’s Overview,” in: Krzysztof Izdebski, Teona Turashvili, Haykuhi Harutyunyan, *The Digitalization of Democracy How Technology is Changing Government Accountability*, National Endowment for Democracy and International Forum for Democratic Studies, March 2023, [https://www.ned.org/wp-content/uploads/2023/03/NED\\_FORUM-The-Digitalization-of-Democracy-Essay-Collection-2.pdf](https://www.ned.org/wp-content/uploads/2023/03/NED_FORUM-The-Digitalization-of-Democracy-Essay-Collection-2.pdf) (accessed January 4, 2024), 1-3.

5 Kerley (2023).



which serve as drivers of economic convergence and sustainable and inclusive growth in the WB (the others being business environment, skills, connectivity and infrastructure, and greening). The OECD finds that performance in the digitalization cluster has been largely positive. An exception, however, is the very low proportion of individuals with basic or above basic digital skills. In the OECD index, “1” is awarded for the OECD good policy practices, standards, and tools. The WB6 stand at 0.61 regarding fixed broadband internet penetration (subscriptions per 100 people), 0.96 on mobile cellular penetration (subscriptions per 100 people), 0.69 on individuals having made digital payments (% of population), and 0.63 on ICT (information and communication technologies) specialists in total employment (% of employment). In contrast, the score is only 0.29 for individuals with basic or above basic digital skills (% of population), showing no positive trajectory.<sup>6</sup>

The Regional Cooperation Council (RCC) is aiming at more closely monitoring the progress of digital transformation in the WB6 region. In late 2022, the RCC calculated the WB Digital Economy and Society Index (DESI) for the years 2021 and 2022. Many of the OECD’s findings were confirmed. In its 2022 report, the RCC highlights the skills gap as a considerable challenge. While many WB6 have introduced policies which aim at improving overall digital skills, the WB region performs well below the EU average in the human capital dimension. The report also underlines the region’s underperformance compared to the EU regarding the integration of digital technology in businesses, particularly small and medium sized enterprises (SME).<sup>7</sup>

In 2022, Europe was the world’s highest ranked region in terms of e-Government development, fol-

lowed by Asia and the Americas, scoring high in online service provision, telecommunication connectivity, and human capacity.<sup>8</sup> However, EU benchmark reports find that WB countries offer some of the worst e-Government services in Europe, scoring on average around 43 percent compared to the EU’s average score of 71 percent. While the region ranks relatively high on user centrality (70%), its ratings for transparency (40%) and cross-border availability (22%) are low.<sup>9</sup> According to the Western Balkans Digital Economy Society Index (2021-2022), the number of internet users interacting with the public administration online in the WB region reached approximately 35 percent (of total internet users) – well below the EU average of 65 percent. The WB6 also scored considerably below regarding digital public services (e.g., the extent to which services or information on services in life events such as career, studying, family, health, moving). The same holds true for open data, i.e., information collected, produced, or paid for by public bodies and made freely available for re-use.<sup>10</sup>

While the WB6 differ among each other in gradients of digital preparedness, the region as a whole faces the challenge of a lacking overarching, cross-country vision or strategy for the digital transformation. Instead, policies have been developed piece-meal and in response to facts on the ground. As a result, the system is often opaque, leaving much room for inefficiencies and corruption while undermining public faith in e-Government services.

The European Commission is working to develop cross-border digital public services, with the aim of saving costs and efficiency for governments and businesses, increasing governmental transparency, and enabling greater civic participation in the EU.<sup>11</sup>

6 OECD, Economic Convergence Scoreboard for the Western Balkans 2023, Paris 2023, <https://www.oecd.org/south-east-europe/ECS-Policy-Paper-2%20web-1.pdf> (accessed January 4, 2024), 6.

7 Vesna Tintor, Nikola Jovanović, Veronika Bocarova, and Mihailo Bugarski, Western Balkans Digital Economy Society Index, WB DESI 2022 Report, Regional Cooperation Council, December 2022, <https://www.rcc.int/download/docs/WB%20Desi%20Report%202022%2025%2005%202023%20final%20HR.pdf/43a521a624cf08523a2268a67a7be2ff.pdf> (accessed January 5, 2023), 9-10.

8 UN e-Government Knowledgebase, e-Government Development Index (EGDI), <https://publicadministration.un.org/egovkb/en-us/About/Overview/-E-Government-Development-Index> (accessed December 22, 2023).

9 Helvetas Eastern Europe, Is the Digital Revolution the Balkans’ Big Chance?, December 14, 2021, <https://www.helvetas.org/en/eastern-europe/about-us/follow-us/helvetas-mosaic/article/December2021/Is-the-Digital-Revolution-the-Balkans-Big-Chance-> (accessed December 22, 2023).

10 Tintor et al. (2022), 35-39.

11 European Commission, e-Government and Digital Public Services, <https://digital-strategy.ec.europa.eu/en/policies/egovernment> (accessed December 22, 2023).

To stay aligned with this, it is crucial for the WB6 to address the challenges and risks associated with digitalization, while ensuring that the benefits are equitably distributed among the population.

One important aspect are capacity-building measures, both for governments and citizens, to restore trust in the process, and digital leadership, to develop sustainable digital strategies. The European Cybersecurity Competence Network and Centre (ECCC),<sup>12</sup> which aims to support EU members in developing long-term strategic approaches to cybersecurity, might be a useful point of reference in this. By addressing these challenges, Western Balkan nations could progress to becoming stronger, more resilient democracies.

### Democratization in the Context of the EU Enlargement Process

The democratization of political processes and establishment of sustainable democracies in the WB6 is essential for long-term stability in the region. A recent survey by the International Institute for Democracy and Electoral Assistance (International IDEA) found that 61 percent of people in the Western Balkans live in democracies, with government assessments ranging from mid-range performing democracies, to weak democracies or hybrid regimes.<sup>13</sup>

Healthy democracies are generally characterized by energetic civic participation, vibrant news and media, independent civil society, effective governing institutions, free and fair elections, impartial rule of law, and equal civil rights.<sup>14</sup> The EU has repeatedly emphasized that rule-of-law reforms in the WB6 are non-negotiable for EU accession, as this safeguards the integrity of the single market. Other important and necessary reforms called for include bolstering freedom of speech and freedom of the press, as well as resolute steps towards combating corruption and government non-transparency.

Functioning democratic institutions are important to fight back against autocratic tendencies in the region, stemming from both within as well as outside of the system. This places Chapters 23 (Judiciary and Fundamental Rights) and 24 (Justice, Freedom, and Security) at the heart of EU enlargement efforts. Stable democracies must be able to defend against radical fragments of the population, especially right-wing populism, all while regulating economic fluctuations and adapting their countries toward a greener future. In this capacity, the crucial role of civil society in driving bottom-up change cannot be underestimated.

However, as the accession process drags on, rising enlargement fatigue in the WB6 is making it difficult for governments to sell uncomfortable reforms to an increasingly Eurosceptic public. Now, the EU's geopolitical awakening in light of Russia's full-scale invasion of Ukraine in 2022 has injected new urgency in the EU enlargement process and brought fresh momentum to EU efforts to integrate the WB region. Just recently, a report by a Franco-German working group<sup>15</sup> was presented, which proposed various reforms to make the EU enlargement-ready. Recommendations in the report included mechanisms to safeguard the rule of law within EU borders, proposals for qualified majority voting procedures, and various approaches to staging accession for WB nations in incremental steps of informal association.

The proposal of gradual integration has been met with some apprehension. While intended to reinvigorate the enlargement process with tangible results, it has raised fears in the region of ending in partial membership and dividing WB neighbor states in their joint bid for membership, as each country ascends at its own pace. To imbue the approach of gradual integration with meaning, policy makers must find ways to keep citizens engaged and inspired in the "magic" of EU membership. Parliamentarians play a major role in this, as do

12 ECCC, The European Cybersecurity Competence Centre, [https://cybersecurity-centre.europa.eu/index\\_en](https://cybersecurity-centre.europa.eu/index_en) (accessed December 22, 2023).

13 International IDEA, Global State of Democracy Findings for the Western Balkans. What is on the Horizon?, February 28, 2023, <https://www.idea.int/news/global-state-democracy-findings-western-balkans-what-horizon> (accessed December 22, 2023).

14 Democracy Fund, Health Democracy Framework, <https://democracyfund.org/who-we-are/healthy-democracy-framework/> (accessed December 22, 2023).

15 Franco-German Working Group on EU Institutional Reform, Sailing in High Seas, Reforming and Enlarging the EU for the 21st Century, Paris-Berlin, September 18, 2023, <https://www.politico.eu/wp-content/uploads/2023/09/19/Paper-EU-reform.pdf> (accessed December 22, 2023).



civil society organizations. Incorporating both more deeply in the Berlin Process will ensure that pro-European citizens have a voice at the table and that the “magic moment” of EU enlargement stays alive.

### Digital Transformation and Its Role in the Economic Development of the Region

In 2018, the European Commission (EC) launched the Digital Agenda for the Western Balkans (WB) with the aim to “support the transition of the region into a digital economy and bring the benefits of the digital transformation, such as faster economic growth, more jobs, and better services.”<sup>16</sup>

The European Parliament understands digital transformation as “the integration of digital technologies by companies and the impact of the technologies on society,”<sup>17</sup> with digital technologies including “digital platforms, the Internet of Things, cloud computing and artificial intelligence.”<sup>18</sup> At the micro level, digital transformation comes with “changes in ways of working, roles, and business offering caused by the adoption of digital technologies in an organization, or in the operation environment of the organization.”<sup>19</sup>

Set within the framework of the subsequent Economic and Investment Plan for the Western Balkans,<sup>20</sup> and based upon the premise that “digital is by definition borderless, spanning regions and continents,”<sup>21</sup> the Digital Agenda sets out various commitments between the EC and Western Balkan ministers. These include investing in broadband connectivity, increasing cybersecurity, trust, and digitalization of industry, strengthening the digital

economy and society, as well as boosting research and innovation.

The commitments of the Digital Agenda aim to enhance businesses’ agility and efficiency. At the micro level, digital technologies can unlock new value for employees, customers, and shareholders. At the macro level, this can lead to sustainable economic growth and thereby increase convergence between EU and WB economies. Currently, the divergence gap is widening from year to year, as the Western Balkans fall behind in digital literacy, digital infrastructure, and labor market regulations.

Perhaps most prominently, WB countries are falling behind in digital skills, leaving businesses and users alike with an insufficient understanding of the possibilities and risks digital technologies pose, as well as poorly developed strategies to meet them. This has had a particularly negative impact on small- and medium-sized enterprises (SMEs), which for the most part lack the skills and funding to harness the promise digital technologies hold.

This lack of digital skill is not unique to the WB region: The EU has identified a considerable gap within its own borders, with a recent survey reporting that 42 percent of EU citizens lack basic digital skills.<sup>22</sup> What is region-specific, however, is underdeveloped digital infrastructure, poor labor market policy regulations, and high rates of emigration from the region (“brain drain”). Young talent leaving the country or accepting remote, freelance work from European companies is severely disrupting the market and depriving the Western Balkan workforce of much-needed digital skills. Countering this could promise a considerable economic upswing

16 European Commission, European Commission Launches Digital Agenda for the Western Balkans. Press Release, Brussels, June 25, 2018, [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_18\\_4242](https://ec.europa.eu/commission/presscorner/detail/en/IP_18_4242) (accessed December 22, 2023).

17 European Parliament, Shaping the Digital Transformation. EU Strategy Explained, October 19, 2023, <https://www.europarl.europa.eu/news/en/headlines/priorities/digital-transformation/20210414STO02010/shaping-the-digital-transformation-eu-strategy-explained> (accessed December 22, 2023).

18 Ibid.

19 Päivi Parviainen, Maarit Tihinen, Jukka Kääriäinen, Susanna Teppola, “Tackling the Digitalisation Challenge. How to Benefit from Digitalisation in Practice,” in: *International Journal of Information Systems and Project Management*, vol. 5, no. 1, 2017, 63-77.

20 European Commission, Western Balkans: An Economic and Investment Plan to Support the Economic Recovery and Convergence. Directorate-General for Neighborhood and Enlargement Negotiations, October 6, 2020 [https://neighbourhood-enlargement.ec.europa.eu/news/western-balkans-economic-and-investment-plan-support-economic-recovery-and-convergence-2020-10-06\\_en](https://neighbourhood-enlargement.ec.europa.eu/news/western-balkans-economic-and-investment-plan-support-economic-recovery-and-convergence-2020-10-06_en) (accessed December 22, 2023).

21 European Commission, European Commission Launches Digital Agenda for the Western Balkans. Press Release, Brussels, June 25, 2018, [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_18\\_4242](https://ec.europa.eu/commission/presscorner/detail/en/IP_18_4242) (accessed December 22, 2023).

22 European Parliament, Shaping the Digital Transformation. EU Strategy Explained, October 19, 2023, <https://www.europarl.europa.eu/news/en/headlines/priorities/digital-transformation/20210414STO02010/shaping-the-digital-transformation-eu-strategy-explained> (accessed December 22, 2023).

for the region, as the Western Balkans are a promising location for IT expertise.

Investing in WB digital infrastructure and transformation can also help curb foreign influence through China and Russia and tie in countries' diasporas. However, the Western Balkans' digital transformation must be managed in a way that leaves no one behind, ensuring that vulnerable communities are given equal access to digital technologies and equipped with the literacy needed to safely navigate digital spaces.

Experts routinely observe that, in order to successfully pursue digital transformation in the Western Balkans, higher levels of regional cooperation are required. The WB region has already begun coordinating efforts to pursue the Digital Agenda, tracking achievements in annual Digital Summits.<sup>23</sup> And countries in the region have since set out a number of Memoranda of Understanding to deepen regional cooperation, most notably in system interoperability. This cooperation must be expanded, not least to ensure that divergence among WB states does not deepen as economies transform at increasingly different paces.

The business sector, civil society, and academia should be involved in a multi-stakeholder approach. Approaches to elevate digital skills across the region must also be interdisciplinary and multi-stakeholder, bringing together public and private actors to generate region-specific knowledge and develop targeted policy recommendations.

## Cyberresilience and Cybersecurity

As overall digital activity increases in public and private spheres, national authorities in the Western Balkans have been reporting higher numbers of cybersecurity incidents.<sup>24</sup> Cyberviolence can be per-

petrated by governments, foreign and domestic, often for the purpose of influence, and from private individuals, mostly to extract data with the purpose of enrichment.

According to the Cybersecurity Ecosystem Report, commissioned by the United Kingdom Government and prepared jointly by PricewaterhouseCoopers GmbH (PwC) and the International and Security Affairs Centre (ISAC Fund), cybersecurity threats faced by WB6 economies generally mirror global threats. The report finds that the numbers of incident reports received by national authorities is increasing. This is reaffirmed by various studies. For example, the Balkan Investigative Journalism Network (BIRN) reported 40 cyber incidents in the Western Balkan region between 2020 and 2023, that predominantly targeted biometrics and digital identity systems (BDI).<sup>25</sup> The number is likely to be higher, as institutions prove reluctant to share information on past attacks for fear of damaging their reputation.

The Cybersecurity Ecosystem Report also found that smaller actors such as SMEs, media actors, and civil society organizations are being increasingly targeted. In addition, attacks are becoming more sophisticated. The report identified different sources of vulnerabilities: governance, technical, capacity and awareness. While awareness is increasing and the WB6 have passed several acts of legislation to address cyber threats, appropriate legislative and institutional frameworks are still underdeveloped, as political, regulatory, and technical capacities remain behind rapid digital advancements. Regional cooperation is often also insufficient to address the growing number of cross-border cyber incidents. Another vulnerability are legacy systems and equipment, especially in the public sector and critical national infrastructure. Finally, the WB6 are struggling with a shortage of cybersecurity experts.<sup>26</sup>

23 Regional Cooperation Council, Western Balkan Digital Summit, [https://www.rcc.int/priority\\_areas/56/digital-economy](https://www.rcc.int/priority_areas/56/digital-economy) (accessed December 22, 2023).

24 PricewaterhouseCoopers and International and Security Affairs Centre, Cybersecurity Ecosystem Report. Western Balkans: Emerging Cyber Threats, March 2022, <https://www.isac-fund.org/wp-content/uploads/2022/04/PwC-Cybersecurity-Ecosystem-Report-WB.pdf> (accessed December 22, 2023).

25 Balkan Investigative Journalism Network, Battle for Balkan Cybersecurity. Threats and Implications of Biometrics and Digital Identity, June 30, 2023, <https://balkaninsight.com/2023/06/30/battle-for-balkan-cybersecurity-threats-and-implications-of-biometrics-and-digital-identity/> (accessed December 22, 2023).

26 PwC and ISAC (2022).

Currently, performance of WB countries vary considerably from one state to the next, as reports by the European Commission have assessed that the WB6 demonstrate at best a moderate level of cyberresilience capabilities.<sup>27</sup> According to these reports, the greatest vulnerabilities to cyber threats in the Western Balkan region stem from inappropriate data handling and cyber hygiene, leading to data breaches, third party exposure, and a higher likelihood of ransomware and phishing attacks.

The rise of generative AI and large language models also brings new risks. On one hand, AI can be utilized to bolster cyber resilience by helping to identify and prioritize risk, spot malware more quickly, guide incident responses, and effectively detect intrusions. On the other hand, AI allows adversaries to launch cyberattacks with unprecedented speed, precision, and scale. It is hard for cyber defense to keep up with the fast-moving innovations of cyberattacks.

Two prominent recent examples of cyber incidents are the attacks on the government of the Republic of Albania and the attack on the IT infrastructure of the government of the Republic of Montenegro.<sup>28</sup> Both underline the vulnerabilities in the region and show that bolstering cyberresilience is an essential condition for stability.

Cyberresilience is generally understood as “an organization’s ability to prevent, withstand and recover from cybersecurity incidents.”<sup>29</sup> Similarly, the European Union Agency for Network and Information Security (ENISA) defines cybersecurity as “all activities necessary to protect cyberspace, its users, and impacted persons from cyber threats.”<sup>30</sup> This includes predicting, preventing, mitigating, and removing cyber incidents, and includes threats to network and information security as subsets of

cybersecurity. Cyberresilience is generally thought to rest upon multiple pillars, including robust policy frameworks, widespread cyber capacities and awareness of digital risks, regional integration and cooperation, and public-private partnerships between government, civil society, businesses, and science.

In the past, the WB6 region has shown reluctance to exchange sensitive information with regional partners, thereby slowing integration and cooperation in the neighborhood. What’s more, the EU long treated cybersecurity as an afterthought, failing to integrate cyberresilience goals into chapters of the acquis.

Today, both the EU and Western Balkans are determined to strengthen cooperation on key security issues and act against information manipulation and foreign influence that would undermine the region’s democratic processes and EU alignment. In December 2023, the European Commission passed the Cyber Resilience Act that sets cybersecurity benchmarks for hardware and software products and holds manufacturers accountable for ensuring these benchmarks throughout a product’s lifecycle.<sup>31</sup> Aligning with these guidelines will better prepare the WB6 for EU accession.

Looking ahead, appropriate response strategies to these new technologies must still be developed. While adapting to AI is a global challenge, the Western Balkan region must step up its overall tempo of adapting to new digital technologies and responding to the threats they pose.

In order to build collective cyberresilience, cybersecurity needs to be integrated into broader national and regional development strategies. As many governments lack the resources to manage this single-handedly, information and resources

27 European Commission, EU Enlargement Package 2023, [https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports\\_en](https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en) (accessed December 22, 2023).

28 Rebecca Beigel and Sven Herpig, A Platform for Sustainable Cybersecurity Cooperation in the Western Balkans, Stiftung Neue Verantwortung, December 2023, [https://www.stiftung-nv.de/sites/default/files/snv\\_platform\\_for\\_sustainable\\_cybersecurity\\_cooperation\\_in\\_western\\_balkans.pdf](https://www.stiftung-nv.de/sites/default/files/snv_platform_for_sustainable_cybersecurity_cooperation_in_western_balkans.pdf) (accessed January 4, 2024).

29 IBM, What is Cyber Resilience? Cyber Resilience Defined, <https://www.ibm.com/topics/cyber-resilience> (accessed December 22, 2023).

30 European Union Agency for Network and Information Security, ENISA Overview of Cybersecurity and Related Terminology, Version 1, September 2017, <https://www.enisa.europa.eu/publications/enisa-position-papers-and-opinions/enisa-overview-of-cybersecurity-and-related-terminology> (accessed December 22, 2023).

31 European Commission, EU Cyber Resilience Act. New EU Cybersecurity Rules Ensure Safer Hardware and Software, <https://digital-strategy.ec.europa.eu/en/policies/cyber-resilience-act> (accessed December 22, 2023).

must be shared throughout the region, perhaps most ideally through national cybersecurity centers (NCCs), or information sharing and analysis centers (ISACs).

### Media Freedom and Its Importance

Digitalization has fundamentally transformed the media landscape, with social media and other digital platforms redefining how information is organized, disseminated, consumed, and shared. A 2020 survey found that, in the Western Balkans, the internet is considered the second-most important source of information after public service broadcasters.<sup>32</sup>

Digital media offer independent journalists new storytelling platforms, but they also come with new opportunities for influence and control that increasingly limit the spaces in which journalists can operate. A vibrant and independent media landscape is a key pillar to a healthy and sustainable democracy. Media freedom is also a crucial safeguard for human rights, making the protection of freedom of the press a matter of regional security and stability.

In the World Media Freedom Index of Reporters Without Borders Albania ranks at place 96, followed by Serbia (91), Bosnia and Herzegovina (64), Kosovo (56), Montenegro (39) and North Macedonia (38). While the trajectory is positive for Albania, Bosnia and Herzegovina, North Macedonia, Montenegro, and Kosovo, Serbia's position deteriorated in 2023.<sup>33</sup>

The Western Balkans face a number of challenges in ensuring free and independent media. A lack of media pluralism, difficult and uncertain funding, poor transparency, political interference, and a deficiency of independent journalism are among the biggest hurdles facing the WB region. Infotainment can often conceal the lack of media plural-

ism and independent reporting. What's more, disinformation and propaganda are diluting the media landscape and undermining trust in all outlets. Strategic lawsuits against public participation (SLAPPs) are another major threat to investigative journalists, independent media outlets, and civil society organizations aiming to protect independent media.

To overcome these challenges, the public right to – professional and independently verified – information must take a front seat in reforms. Journalist protection must be increased. Disinformation and propaganda must be met by holding platforms that host it accountable. The EU has laid out a Code of Practice on Disinformation which Western Balkan countries are encouraged to adopt in its entirety. At the annual EU-WB leader summit in Brussels on December 18, 2023, representatives underlined their intent to strengthen cooperation in fostering media professionalism and media literacy.<sup>34</sup> Media literacy is defined as the ability to “access, analyze and produce information,” with the objective of maintaining “critical autonomy in relationship to all media.”<sup>35</sup>

Within the WB region, there is some divergence in media freedom, with some countries having stronger safeguards in place to independent media than others. Regional exchange and cooperation can help countries to exchange best practice experience and build a stronger front to leverage powerful social media platforms to demonetize propaganda and disinformation.

### Hate Speech and Disinformation

The EU distinguishes three types of information disorders, with varying intents of harm to individuals, groups, organizations, or countries: disinformation, misinformation, and malinformation. According to the European Commission, disinformation is “verifiably false or misleading information that is designed, presented and disseminated

32 Vera Stojarova, “Media in the Western Balkans. Who Controls the Past Controls the Future,” vol. 20, no. 1, December 15, 2019, 161-181.

33 Reporters Without Borders, World Media Freedom Index, 2023 <https://rsf.org/en/index> (accessed January 4, 2024).

34 Delegation of the European Union to Montenegro, EU-Western Balkans Summit 2023. A Vital Cooperation Between Current and Future EU Members, December 18, 2023, [https://www.eeas.europa.eu/delegations/montenegro/eu-western-balkans-summit-2023-vital-cooperation-between-current-and-future-eu-members\\_en](https://www.eeas.europa.eu/delegations/montenegro/eu-western-balkans-summit-2023-vital-cooperation-between-current-and-future-eu-members_en) (accessed December 22, 2023).

35 Robert Tomljenovic, Authorities for Electronic Media and Media Literacy. Comparative Analysis of the Best European Practices, <https://rm.coe.int/regulatory-authorities-for-electronic-media/1680903a2a> (accessed December 22, 2023).

for the purpose of economic gain or to intentionally deceive the public and which may cause public harm.”<sup>36</sup> Malinformation, on the other hand, is fact-based information deliberately shared to cause harm, while misinformation is false information that was created unintentionally, for example through a journalistic mistake.<sup>37</sup>

These disorders are not contained by country, but frequently spill over borders through shared languages and social contexts. Disinformation can be spread through foreign and domestic actors and is frequently found on social platforms, as these are widely unregulated. Regulatory frameworks in WB6 are still underdeveloped, and WB governments are strongly recommended to adopt EU disinformation legislation found in the Digital Service Act (DSA) and Digital Markets Act (DMA). The European Commission has recently taken action against the social media platform X, formerly Twitter, in its first application of the DSA, for spreading illegal content and disinformation.<sup>38</sup>

Currently, 83 percent of EU citizens believe disinformation threatens democracy, 63 percent of younger citizens believe they encounter fake news more than once a week, and 51 percent believe they have encountered disinformation online.<sup>39</sup> False, inaccurate or deliberately misleading information, conspiracy theories, propaganda, filter bubbles, and hate speech can cause considerable damage to the ability of citizens to hold informed political opinions, and thus pose a threat to democracy and a free and open social order. This applies even more acutely in times of crisis and war, whereby infor-

mation disorders tend to increase exponentially on poorly regulated online platforms.

The Western Balkans have increasingly suffered from the disinformation environment and a lack of objective reporting in recent years, particularly on social media but also in traditional media. Disinformation, propaganda, and information manipulation are the most common information disorders – the EU calls it endemic and ubiquitous.<sup>40</sup>

A study commissioned by the European Parliament analyzed the disinformation environment in the WB region in the period from 2018 through 2020. The authors of the study found that the mass of disinformation was produced and disseminated by domestic actors for domestic purposes.<sup>41</sup> At the same time, foreign actors – including Russia, China, Türkiye and some others – were a prominent source of disinformation.<sup>42</sup> The study highlighted three key disinformation challenges: 1. external challenges to EU credibility; 2. disinformation related to the COVID-19 pandemic; and 3. the impact of disinformation on elections and referendums. Lastly, the study argued that the disinformation environment was both a symptom of social and political disorder and amplifier of it.<sup>43</sup>

Hate speech represents another significant problem for social peace in the Western Balkans, where insults and abuse of ethnic, religious, and sexual minorities have increased. By poisoning the social climate and impeding solidarity across divisions, hate speech fuels splits along denominational and ethnic fault lines which contribute to violence, crime, and

36 European Commission, Communication from the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM(2018) 236 final, April 26, 2018, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0236> (accessed March 25, 2024).

37 Robert Tomljenovic, Authorities for Electronic Media and Media Literacy. Comparative Analysis of the Best European Practices, <https://rm.coe.int/regulatory-authorities-for-electronic-media/1680903a2a> (accessed December 22, 2023).

38 Mared Gwyn Jones, “Brussels Launches Legal Action Against Elon Musk’s X Over Illegal Content, Disinformation,” in: Euronews, December 18, 2023, <https://www.euronews.com/my-europe/2023/12/18/brussels-launches-legal-action-against-musks-x-over-illegal-content-disinformation> (accessed December 22, 2023).

39 European Commission, A Strengthened EU Code of Practice on Disinformation. A Growing Threat to European Democracies, [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy/strengthened-eu-code-practice-disinformation\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy/strengthened-eu-code-practice-disinformation_en) (accessed December 22, 2023).

40 Samuel Greene, Gregory Asmolov, Adam Fagan, Ofer Fridman, Borjan Gjuzelov, Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them, European Union, 2021, [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO\\_STU\(2020\)653621\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO_STU(2020)653621_EN.pdf) (accessed January 5, 2024).

41 Ibid.

42 Daniel Sunter, Disinformation in the Western Balkans, December 21, 2020, <https://www.nato.int/docu/review/articles/2020/12/21/disinformation-in-the-western-balkans/index.html> (accessed January 5, 2024).

43 Greene et al. (2022).



instability. Both state and non-state actors are complicit in creating today's information environment, and both must be engaged in addressing hate speech and disinformation through constructive solutions.

Artificial intelligence is likely to amplify these problems. The language development bot ChatGPT logged 1 million users within the first five days of its release.<sup>44</sup> With the growing role of sophisticated machine learning tools come great opportunities for businesses and private consumers, with Forbes reporting that 64 percent of businesses surveyed believe AI will help increase overall productivity.<sup>45</sup> But on the downside, AI also opens the gateway for disinformation at a level of sophistication that is hard to detect, and at a potential speed that is nearly impossible to counter. An in-house Forbes survey showed that 75 percent of consumers are concerned about disinformation and misinformation from AI.<sup>46</sup>

One key recommendation for tackling disinformation, aside from elevating media literacy, is regulating business models that incentivize disinformation. Given that the WB is a small market with limited leverage, regional cooperation is essential to gather strength in numbers. It is also worth considering expanding the EU single digital market into the WB region.

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<sup>44</sup> Forbes Advisor, 24 Top AI Statistics and Trends in 2023, <https://www.forbes.com/advisor/business/ai-statistics/> (accessed December 22, 2023).

<sup>45</sup> Ibid.

<sup>46</sup> Ibid.

# Facilitating Digital Citizenship in the Western Balkans Through Digital Inclusion

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The governments of the Western Balkan (WB) countries, like all other European governments, are required to adapt to the challenges that have emerged in the digital era. Digital citizenship, as rights and responsibilities, has become integral to a democratic state in this era, necessitating policies and institutional designs focused on inclusive digital welfare.

The following paper examines the role of digital inclusion in the WB, utilizing the framework of researcher Jan van Dijk<sup>1</sup> for understanding digital inclusion, to assess its influence on digital citizenship. Using the EU's Digital Society and Economy Index, the Balkan Barometer, and a professional training program, the analysis reveals a discrepancy between high internet access and low digital inclusion, particularly in digital competence and public digital service usage. Notable variations among the WB countries are also explored, alongside EU and regional collaboration. The paper highlights policy measures for improving digital inclusion, thereby fostering inclusive digital citizenship in the WB. Key policy recommendations include conducting national and regional surveys, establishing citizen centers to support digital inclusion, and designing inclusive, user-friendly public digital services.

## Setting the Stage

Governments and organizations face new challenges, which demand new policy tools and relations with citizens in the digital era. Digital transformation expands the opportunities of citizens and reshapes the knowledge and skills required for active and informed participation in modern digital society. Digital transformation varies by a country's unique social, economic, and political landscape, leading to diverse stages, paths, goals, and barriers. Digital transformation influences how citizens exercise their democratic citizenship rights, including

how they access public services, shaping the very nature of modern digital citizenship.<sup>2</sup>

In research, digital citizenship commonly refers to citizens' ability to participate in and navigate public and private digital domains safely.<sup>3</sup> A more narrow conceptualization frames digital citizenship as citizens' ability to exercise their civic, political, and social rights and responsibilities in a digital context.<sup>4</sup> This includes citizens' ability to access and use public digital services. A key to enhancing and supporting digital citizenship is to focus on digital inclusion and develop programs that promote access, use, and

1 Jan van Dijk, *The Digital Divide*, Hoboken: John Wiley & Sons, 2020.

2 Birgit Jaeger, "Digital Citizenship. A Review of the Academic Literature," in: *dms – der moderne Staat – Zeitschrift für Public Policy, Recht und Management*, 14, 1, 2021, 5-6.

3 Karen Mossberger, Caroline Tolbert, and Ramona McNeal, *Digital Citizenship. The Internet, Society, and Participation*, Cambridge: MIT Press, 2007.

See also: Mike Ribble, *Digital Citizenship in Schools. Nine Elements All Students Should Know*, Washington DC: International Society for Technology in Education, 2015.

4 Jaeger, 2021.

participation in democratic digital contexts.<sup>5</sup> The subsequent analysis underlines the importance of fostering democratic digital citizenship.<sup>6</sup>

Research shows that digital inequalities linked to, for example, race, class, and gender exacerbate societal divides, reflected and reshaped in the digital realm. The digital divide concept was launched by a pathbreaking study by Pippa Norris<sup>7</sup>, revealing how unequal digital access creates new societal challenges. This argument has formed research in academia and policy. Now, the rapid evolution of digital technologies outpaces many users' capabilities, embedding societal barriers in the digital transformation of welfare states and the provision of public services.<sup>8</sup>

The following analysis centers on the question, how digital inclusion, especially in terms of public digital services, can be improved in WB countries. As such, possibilities to enhance and develop digital citizenship through increased digital participation and the use of public digital services are discussed.

### Methods and Materials

This paper builds on two parts of research. Firstly, an analysis of datasets of open data, especially the EU's Digital Economy and Society Index (DESI)<sup>9</sup> and the Balkan Barometer<sup>10</sup> which is conducted by the Regional Cooperation Council (RCC). The WB DESI is developed by RCC based on the same methodology as the EU DESI. The data is provided by government authorities in WB countries. The Balkan Barometer is the RCC's own dataset, collected through extensive face-to-face surveys covering the whole region. The Balkan Barometer sur-

vey targets the adult population in the WB. The DESI data allows comparison with the EU, while the RCC's own data does not.

Secondly, the analysis builds on insights from the professional training program SeGRID for young professionals in the WB, that is hosted at Linköping University. Since 2019, SeGRID has trained and collaborated with over 100 public servants, policy makers, and civil society members. Insights were drawn from discussions during the training program on democratic digital governance<sup>11</sup> and the cases the participants shared.<sup>12</sup>

### What is Digital Inclusion? An Analytical Framework

Jan van Dijk proposes a structured framework of digital inclusion<sup>13</sup> that has been very commonly used in research as well as to promote digital inclusion and to build digital capabilities.

van Dijk's framework emphasizes that digital inclusion involves addressing motivation, ensuring access to digital tools, fostering competence in using these tools, and promoting active usage. He argues that a comprehensive approach that considers these four dimensions is necessary to bridge the digital divide and create an inclusive digital society. The last aspect, usage, implies that two citizens can be motivated, have the same access, and have the competence to use technology, but then actually use technology in different ways for different reasons, at different times, and to various extents.

5 Christina Hennig Manzuoli, Ana Vargas Sánchez, and Erika Duque Bedoya, "Digital Citizenship. A Theoretical Review of the Concept and Trends," in: Turkish Online Journal of Educational Technology, 18, 2, 2018, 10-18.

6 Ahmed Kaharevic and Karin Skill, "Digital Citizenship in Swedish Marginalised Neighbourhoods. Different Attitudes to and Experiences of Digital Inclusion and eHealth," in: JeDEM-eJournal of eDemocracy and Open Government, 13, 1, 2021.

7 Pippa Norris, Digital Divide. Civic Engagement, Information Poverty, and Internet, Cambridge: Cambridge University Press, 2001.

8 Christian Østergaard Madsen, Ida Lindgren, and Ulf Melin, "The Accidental Caseworker. How Digital Self-service Influences Citizens' Administrative Burden," in: Government Information Quarterly, 39, 101653, 2022, 1-11.

9 European Commission, Digital Economy and Society Index (until 2022), <https://digital-decade-desi.digital-strategy.ec.europa.eu/datasets/desi-2022/charts> (accessed November 11, 2023).

10 Regional Cooperation Council, Balkan Public Barometer, <https://www.rcc.int/balkanbarometer/results/2/public> (accessed November 11, 2023).

11 Linköping University, SeGRID. Sustainable e-Government for Resilience, Innovation and Democracy, <https://liu.se/en/article/segrid> (accessed December 1, 2023).

12 Carl Johan Sommar, Aneta Kulanovic, Ahmed Kaharevic, Elin Wihlborg, and Helena Iacobaeus, Best Practice of Digital Government in Emerging Democracies. Illustrations, Challenges and Reflections of State Building Processes, Proceedings of the 54th Hawaii International Conference on System Sciences, January 2021, <https://scholarspace.manoa.hawaii.edu/items/0f3c4cfe-4b27-435d-8eb8-14e74d974e69> (accessed December 1, 2023).

13 van Dijk, 2020.

**Table 1. e-Government Availability**

	Public Services (index)	Personal Documents (%)	Pre-Filled Forms (%)
ALB	35	90	71
BIH	49	60	74
KOS	45	91	55
MKD	36	64	73
MNE	48	60	22
SRB	43	85	79
WB	43	75	63
EU	75	N/A	65

Sources: European Commission, 2022; Regional Cooperation Council, 2023.

### Digital Transformation of Public Services in the Western Balkans

Digital transformation has sped up in WB countries and did so especially during the COVID-19 pandemic. Today, these countries offer various public digital services, provided through platforms such as eUprava in Montenegro, eUslugi in North Macedonia, and eKosovo. The table below shows an overview of public digital services.

While all WB states lag behind the EU, there is still a considerable share of e-Government services available. However, usage of public digital services remains low, as indicated by the data on usage indicators, which are measured differently by the EU and the RCC, as detailed in the subsequent table.

The low usage of public digital services poses a challenge to digital inclusion and the realization of democratic digital citizenship. SeGRID participants have often problematized the design of public digital services and the fact that those often are preconditions for other offline services. The data also shows that 35 percent of the population in the region is satisfied with the accessibility to digital public services while 27 percent are not.<sup>14</sup>

**Table 2. e-Government Usage (%)**

	Usage	Usage	Personal Documents
ALB	43	29	57
BIH	22	3	7
KOS	26	1	36
MKD	32	7	19
MNE	36	8	15
SRB	40	22	37
WB	35	12	28
EU	65	N/A	N/A

Sources: European Commission 2022; Regional Cooperation Council, 2023.

### Analyzing and Comparing Digital Inclusion in the Western Balkans

The subsequent section follows the structure of van Dijk's model and presents data on digital inclusion in the Western Balkans.

#### Step 1: Motivation

Motivation and attitudes are the first step for citizens to consider using (public) digital services. The table below shows preferences of citizens in WB countries regarding how they want to access personal and other types of documents. Digital public services are often a precondition for offline services, like obtaining permits and information in order to conduct other offline procedures, as stated by SeGRID participants.

Broadly in the region, almost half of the population prefers obtaining documents offline, which indicates quite a low motivation to use digital public services. Albania is the only country where online services are preferred over physical. This could be a consequence of eAlbania, a platform that SeGRID participants often named as a positive example. Citizens of Bosnia and Herzegovina show the lowest preference for online (11%) over offline (53%) services. The table below shows citizens' concerns about a society's increasing use of the internet and digital tools.

<sup>14</sup> Regional Cooperation Council, 2023.

**Table 3. Preference When Obtaining Personal and Other Documents (%)**

	Online	Physically	No Preference
<b>ALB</b>	47	38	13
<b>BIH</b>	11	53	30
<b>KOS</b>	31	51	12
<b>MKD</b>	24	44	29
<b>MNE</b>	18	51	29
<b>SRB</b>	26	53	20
<b>WB</b>	26	48	22

Source: Regional Cooperation Council, 2023.

**Table 4. Concerns about the Internet (%)**

	Cyber-security	Pay online	Digital Skills	Nothing
<b>ALB</b>	50	19	13	29
<b>BIH</b>	36	19	14	23
<b>KOS</b>	45	57	6	9
<b>MKD</b>	41	27	9	22
<b>MNE</b>	40	27	8	22
<b>SRB</b>	36	26	14	25
<b>WB</b>	41	30	10	21

Source: Regional Cooperation Council, 2023.

The overview demonstrates that a larger share of citizens is concerned about cyberattacks and cyber-crime (41%), compared to those without any concerns (21%). Interestingly, only a small portion of society is concerned about not having the digital skills to use the internet and digital media (10%).

Having concerns about cybersecurity is not a barrier to digital inclusion but can be seen as an element of digital competence and trust, as discussed in the EU program on digital inclusion.<sup>15</sup> The share of citizens preferring to obtain documents physically will be a challenge when developing a digital democratic government and citizenship. SeGRID participants often stated that paper documents and stamps were more “authoritative” in the region. This will be challenging for digital transformation to replace.

### Step 2: Access

Having physical access (through broadband or phones) to the internet and digital public services is van Dijk’s second step towards digital inclusion.

As shown in the table below, the share of households with a fixed broadband network is almost the same in the Western Balkans (77%) as in the EU (78%). Kosovo and Montenegro even exceed the EU average. However, when looking at fixed broadband networks with at least 100 Megabits per second (mbps), WB countries (21%) lag behind the EU

(41%). The total percentage across the WB region is lowered by North Macedonia (7%) and Bosnia and Herzegovina (15%). Kosovo (45%) and Montenegro (40%) have the largest share of households with at least 100mbps fixed broadband speeds. Lastly, the share of users with mobile broadband access is similar between WB states (82%) and the EU (87%). Notable differences can be seen between Montenegro (91%) and Serbia (96%) on one side, and Bosnia and Herzegovina (63%) on the other.

Access to broadband does not seem to be a central issue for digital inclusion in WB states. However, with advancing digitalization, the need for faster internet, at least 100 mbps, will become more apparent. Furthermore, SeGRID participants often raised concerns about broadband access in rural areas as a key constraint both for digital inclusion and for socio-economic development in general.

### Step 3: Competence

The third step in van Dijk’s framework is digital competence or skills. Data from WB states and the EU is found in the table below.

The overview shows that all WB countries lag behind the EU, both in terms of basic and advanced skills. The share of citizens with at least basic skills is lowest in Albania (24%) and Kosovo (28%), and highest in Montenegro (47%) and Serbia (41%). Notably, the share of citizens with advanced skills

<sup>15</sup> European Commission, Digital Inclusion, <https://digital-strategy.ec.europa.eu/en/policies/digital-inclusion> (accessed January 8, 2024).



**Table 5. Broadband Subscriptions (%)**

	Fixed	At least 100 Mbps fixed	Mobile
<b>ALB</b>	77	7	73
<b>BIH</b>	69	15	63
<b>KOS</b>	99.7	45	78
<b>MKD</b>	78	2	76
<b>MNE</b>	96	40	91
<b>SRB</b>	72	26	96
<b>WB</b>	77	21	82
<b>EU</b>	78	41	87

Sources: European Commission, 2022.

is highest in Kosovo (14%) and lowest in Albania (4%), but all states still lag substantially behind the EU. This is a clear indication of a general challenge to improve digital inclusion, despite the low concerns about digital competence citizens reported, as discussed above.

A common task when dealing with public administration is the need for personal documents and certificates. These can easily be transformed into digital services. Table 6 provides an overview of whether citizens know how to obtain personal documents online.

In total, 30 percent of WB citizens do not know how to or cannot obtain personal documents online. Differences are most apparent between North Macedonia (21%) and Kosovo (45%). The reasons behind these numbers are not obvious in the dataset, but looking at the other results suggests that a lack of digital skills could be a reasonable explanation. This can be corrected with policy initiatives.

#### Step 4: Usage

The last step of van Dijk’s model is usage. As mentioned above, the usage of public digital services in the region is low. However, internet usage in general is rather high – at 89 percent as seen in the table below. SeGRID participants often mentioned high internet usage. At the same time, participants problematized the high overall internet usage compared to the low use of public digital services. A common statement was that the internet was used for social media and not for public digital services.

**Table 6. Digital Skills (%)**

	At Least Basic Skills	Advanced Skills
<b>ALB</b>	24	4
<b>BIH</b>	35	5
<b>KOS</b>	28	14
<b>MKD</b>	35	8
<b>MNE</b>	47	9
<b>SRB</b>	41	12
<b>WB</b>	35	9
<b>EU</b>	54	27

Sources: European Commission, 2022.

Neither RCC’s Balkan Barometer nor DESI provide direct data on the share of internet users. However, RCC’s Balkan Barometer provides questions to which respondents can reply why they do not use the internet. These questions show different results on the share of internet users. Responses to one of these questions indicate that internet usage is extremely high, for example in Albania (100%) and Kosovo (99%). At the same time, Albania is ranked among the lowest in the other question (84%). A similar pattern is found in North Macedonia. Kosovo scores 99 percent in both.

Collectively, the significantly high data usage observed in, for example, Albania and Kosovo, alongside the varying outcomes from two distinct questions on internet usage, call into question the data’s reliability. Nonetheless, it can be assumed, compared to the other steps in van Dijk’s model, that internet usage is not the central concern for digital inclusion, as will be further discussed in the policy recommendations below.

#### Analysis of Regional Cooperation

Western Balkan countries face similar challenges regarding digital inclusion. Especially with regard to the discrepancy between the rather high internet use on the one hand, and the low use of public digital services on the other. Furthermore, in general, they lag behind the EU average. At the same time, there are several differences between countries. For example, Albania and Bosnia and Herzegovina differ in terms of preferences for obtaining

**Table 7. Do not Know How to or Cannot Obtain Personal Documents Online (%)**

	Do not Know/ Cannot
<b>ALB</b>	32
<b>BIH</b>	27
<b>KOS</b>	45
<b>MKD</b>	21
<b>MNE</b>	25
<b>SRB</b>	32
<b>WB</b>	30

Source: Regional Cooperation Council, 2023.

personal documents. Montenegro, Kosovo, and Bosnia and Herzegovina differ regarding broadband access. Kosovo, Albania, Montenegro, and Serbia differ in digital competence. There are also differences between countries regarding the different stages of digital inclusion. For example, Kosovo has more broadband access, but lower digital competence among citizens.

Differences among the six WB countries, also in comparison with the EU, could have several explanations. Previous research does highlight economic factors such as Gross Domestic Product (GDP) per capita, social factors such as trust in society, and political factors such as the ambition of political leaders, as relating to digital transformation, citizenship, and inclusion.<sup>16</sup> Another social factor is the almost holy status that stamps and papers have in public service delivery. Thus, it is important to make policy changes towards an inclusive digital citizenship that will take off from the socio-economic and cultural situation in each country. Similarities among the countries can be helpful and promote growth and trust, while the uniqueness of each country also has to characterize the political design of digital government.

Similarity between countries enables collaboration and the exchange of knowledge, best practices, and

**Table 8. Internet Use (%)**

	Users	Users
<b>ALB</b>	84	100
<b>BIH</b>	93	98
<b>KOS</b>	99	99
<b>MKD</b>	83	98
<b>MNE</b>	91	94
<b>SRB</b>	87	96
<b>WB</b>	89	98

Source: Regional Cooperation Council, 2023.

experience. At the same time, differences must be taken into account when collaborating. This means that each state will need to place a different focal point in the way they facilitate digital inclusion and foster democratic digital citizenship.

Collaboration should be sought between all six WB nations. One major issue for this will be how to utilize the high internet use to motivate and facilitate increased use of public digital services. This question is all the more relevant considering that all countries have ambitions to increase digitalization in the public sector.

There is also a need for a more elaborated and nuanced mapping of digital access, competence, and skills. This will help to develop relevant policies for enhancing digital inclusion and shaping digital citizenship. The data above has a rather limited scope of variables. Furthermore, the different results concerning internet use, and the extremely high share of internet users among some countries, raised concerns about the quality of the data. This is also an aspect where collaboration can be useful.

### Analysis of Cooperation with the EU

Digital inclusion has been on the agenda for a long time and guided the EU policies not least concern-

<sup>16</sup> Tanja Paneva and Ahmed Kaharevic, "In E-government We Trust? Correlating Factors of E-government Use in the Western Balkan and EU Countries," in: *Balkan Social Science Review*, Vol 22, 2023. Tamara Duričković and Dijana Kovacević, "eGovernment in the Context of Developing Countries," in: *2011 Proceedings of the 34th International Convention MIPRO*. IEEE, 2011. Yingqin Zheng, Mathias Hatakka, Sundeep Sahay and Annika Andersson, "Conceptualizing Development in Information and Communication Technology for Development (ICT4D)," in: *Information Technology for Development* 24,1, 2018, 1-14.

ing labor market integration. A democratic digital transformation in the WB region is a crucial step towards further EU integration for the WB.

Digital skills are becoming one of the major issues for digital inclusion in Europe, since a lack of skills will lead to citizens not being able to use the technology available, despite access to it. Digital skills are demanded in most occupations and commonly seen as a barrier to labor market participation, and for democratic participation. It is clearly embedded in the European Pillar of Social Rights Action Plan.<sup>17</sup> The EU's target for digital skills in Europe's Digital Decade 2030 program is for at least 80 percent of the population to have at least basic digital skills.<sup>18</sup> The data here shows that this is an issue for the WB countries as well. Only about one third of the population in the region has at least basic digital skills. The action plan may provide useful guidance for further policy development in the WB region.

The EU's digital inclusion policies can be seen as a key component of broader initiatives, such as the Digital Single Market and the Digital Europe Program. These policies aim to create a digital environment that benefits all and contributes to economic growth and innovation.

Since digital competence stands out as one of the lowest-ranked elements of van Dijk's framework, the EU's Digital competence model has to be considered,<sup>19</sup> which focuses on five components to increase digital capabilities. Firstly, it encourages training on information and data literacy, focusing on capacities to articulate information needs and to locate, retrieve, manage, store, and share digital data in a safe way. Secondly, it also supports communication and digital collaboration, to participate in society and express one's citizenship rights and duties. Thirdly, it focuses on digital content creation, by integrating and translating information

and content. All this is with knowledge of proper safety. Finally, it includes teaching problem solving, by using digital tools.

There have long been extensive policies promoting broadband access and related infrastructural support in WB states (as seen in Table 5 above). Here, it can be pointed to the importance of digital capabilities, based on the data provided above.

Aiming to enhance the digital transformation of the whole European region, the EU launched the Digital Agenda for the WB in 2018. It encourages research and innovation as well as strengthens digital infrastructure, digital economy, and society. As prospective EU member states, the WB countries, Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia, expressed commitment to implementation of the action items envisaged in this digital agenda: "The WB region has already clearly stated its ambition to use DESI to monitor progress in the main areas of digital transformation and to compare digital performance of WB economies within the WB region and with the EU. The first step in this process is to ensure a reliable and continuous data collection process. All WB economies have already mandated authorities responsible for data collection process for calculating DESI indicators."<sup>20</sup>

The pursuit of fostering democratic digital citizenship through enhanced digital inclusion is a widespread challenge, extending beyond the WB. Nevertheless, each country's approach to this challenge is distinctly shaped by its unique social, economic and political context. In the case of the Western Balkans, the progression towards democratic digital citizenship is particularly influenced by specific regional challenges. These include prevalent issues of corruption, a pervasive lack of political trust, concerns over transparency, and constrained media

17 European Commission, The European Pillar of Social Rights Action Plan, <https://op.europa.eu/webpub/empl/european-pillar-of-social-rights/en/> (accessed December 1, 2023).

18 European Commission, Europe's Digital Decade. Digital Targets for 2030, [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/europes-digital-decade-digital-targets-2030\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/europes-digital-decade-digital-targets-2030_en) (accessed December 1, 2023).

19 European Commission, DigComp Framework, [https://joint-research-centre.ec.europa.eu/digcomp/digcomp-framework\\_en](https://joint-research-centre.ec.europa.eu/digcomp/digcomp-framework_en) (accessed December 1, 2023).

20 Vesna Tintor, Nikola Jovanović, Veronika Bocarova, Mihailo Bugarski, Western Balkans DESI 2022 Report, January 2023, <https://www.rcc.int/download/docs/WB%20Desi%20Report%202022%2025%2005%202023%20final%20HR.pdf/43a521a624cf08523a2268a67a7be2ff.pdf> (accessed December 1, 2023).

freedom. Addressing these challenges is crucial for promoting democratic digital citizenship in the WB. Furthermore, while democratic digitalization itself is not a formal requirement for EU integration, it serves as a vital tool in meeting the EU's democratic standards. However, it is promoted by the EU and has the potential to support the region's deeper integration with the European Union. By tackling these unique regional obstacles, the Western Balkans can make substantial progress in its journey towards digital inclusivity and democratic advancement.

## Conclusion and Recommendations

This paper has analyzed stages of digital inclusion in the WB region, with the aim of facilitating democratic digital citizenship. The main issue, both in data and stated by SeGRID participants, is the low use of public digital services despite a rather high internet use. At a general level, all WB countries lag behind the EU average in terms of digital inclusion. According to the data, digital competence is a central issue for increased digital inclusion in the WB. Digital competence is also a central issue for other papers in this edited volume. Higher digital competence can increase awareness of cyberthreats and disinformation. Further, it can make businesses more innovative and competitive.

Policies have to build on the wide variations among and within WB countries regarding digital inclusion. Policies have to be formed based on all stages in van Dijk's framework and in particular to enhance competencies. Three recommendations can be made to facilitate democratic and competence-based digital citizenship that has to be contextualized before being implemented.

The following policy recommendations address the regional governments, civil society, and the EU. Successful implementation of all three recommendations demands collaboration among different levels of government and with organizations outside the government.

### 1. National and Regional Surveys

There is a lack of data on the attitudes and behaviors of citizens regarding digital inclusion. Current data captures only a limited aspect of digital inclusion. Improved data would enable better knowledge, for example, of why citizens do or do not use digital public services. This is fundamental for more knowledge-based policy-making. Sweden offers some interesting learnings: Successful digitalization is often based on clear leadership and responsibility, as well as processes that take citizens' needs and wants into account.

Furthermore, improved data through national and regional surveys would allow inferential statistical analyses that could map reasons and causes for digital inclusion. Again, Sweden can serve as an example. There is a national survey called "The Swedes and the Internet,"<sup>21</sup> which features as survey of ten thematic areas, including approximately 70 questions relating to internet use and digital technology. It is also related to the World Internet Project for quality assurance and to secure further learning and development. WB countries should thus collaborate in national and regional surveys on digital inclusion. Governments in the region should prioritize this and fund independent surveys, even if the practical management can be outsourced. The RCC Balkan Barometer offers a good starting point and could be a partner. In addition, the EU Digital Competence Framework<sup>22</sup> can be an important guide as the World Internet Project can be too.

### 2. Citizen Centers for Digital Inclusion

There is a need to form open and publicly funded centers instructing users on how to use digital services. This is critical to enhance competence among all citizens. These centers can be both funded and operated by state and/or local level government, or in collaboration. Partnership with civil society should be encouraged. These centers can be incorporated into already existing organizations and projects such as libraries, citizen centers, and educational associations. These centers should primarily target competencies to access and use public

21 Svenskarna och Internet, The Swedes and the Internet, <https://svenskarnaochinternet.se/english/> (accessed December 1, 2023).

22 European Commission, DigComp Framework, [https://joint-research-centre.ec.europa.eu/digcomp/digcomp-framework\\_en](https://joint-research-centre.ec.europa.eu/digcomp/digcomp-framework_en) (accessed December 1, 2023).

digital services and also increase overall digital literacy.

SeGRID participants often discussed the need for these centers and got inspiration from study visits to such Swedish centers. Centers in Sweden are organized by public-private civic partnerships and often located in municipal libraries.<sup>23</sup> Experiences from Sweden show that the centers manage to target a broad range of various groups in society, including vulnerable populations at risk of digital exclusion. WB countries could share their experience and knowledge in organizing and managing these centers as well as in collaborating with local governments and civil society, with a focus on vulnerable and marginalized groups, for example the Roma population. In Sweden, the funding is often provided by national or local government agencies, while municipalities and/or civil society manage the centers. Municipalities and civil society also offer assistance for digital inclusion through different projects embedded into educational or community associations.

### 3. Designing Inclusive and User-Friendly Public Digital Services

Inclusive and user-friendly design is crucial for digital inclusion. While the digital transformation of the public sector and wider society is speeding up in the WB region, SeGRID participants often criticized the design of the public digital services in their countries. One strategy they have proposed is to empower young professionals in public administration to develop their skills to create inclusive and user-friendly digital services. Hereby each public agency could fund and support better service design and open for partnership with civil society and the tech industry.

The extremely high degree of mobile internet use over fixed broadband connections in the region also indicates that digital public services should be designed for mobile access to promote more trustworthy and safer user experiences. In addition, it indicates that access is more flexible and remote than through fixed home or office connections. Im-

proved designs must build on knowledge generated from surveys and the experiences of challenges addressed at citizen centers as per the first and second recommendations. WB countries should collaborate on sharing experiences and organize joint training programs to build secure and trustworthy public digital services that can promote inclusive digital citizenship.

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<sup>23</sup> Digidel, DigidelCenter, <https://digidel.se/digidelcenter/> (accessed December 1, 2023). Elin Wihlborg and Helena Iacobaeus, “Context Matters – Different Entrepreneurial Approaches Among Street-level Bureaucrats Enhancing Digital Inclusion,” in: *European Policy Analysis*, 9, 4, 2023, 379-396.



# Digitalization and Public Service Delivery

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The digitalization process of public service delivery in the Western Balkans (WB) has run at a fast pace since the introduction of the Digital Agenda launched in 2018. However, countries face challenges that hinder the delivery of public services using Information and Communications Technology (ICT). The continuous support and funding by the European Union (EU) has the potential to improve the modernization and efficiency of the public administration, based on digitalization, enhancement of e-Government, electronic communication between and within institutions, provision of digital services, and design of inclusive and easily accessible platforms.<sup>1</sup> However, the EU identifies several challenges regarding public service delivery and digitalization.<sup>2</sup> While some countries like Serbia and Albania have made significant progress in digital transformation and public service delivery, others, such as Bosnia and Herzegovina, are facing challenges and are lagging behind.

## Setting the Stage

Governments worldwide are facing growing calls for better digital communication with citizens and businesses. As technology usage increases, citizens and businesses expect that their government will offer secure and accessible communication as they experience with other technologies in their daily lives. One of the main channels for using digitalization as a tool for public service delivery is the e-Government platform where citizens and businesses can access a wide range of services and information. E-government is the use of information and communication technology to improve the processes of government.<sup>3</sup> It is directed toward more efficient, transparent, and accountable public ser-

vice delivery through free flow of information. According to Svard, the implementation of e-Government has resulted in a rise of information that governmental bodies must effectively manage to guarantee its security, authenticity, and reliability.<sup>4</sup>

The digitalization of public services has been a key priority in the Western Balkans government agendas, especially amidst the COVID-19 pandemic when the need for digital access to services and information significantly rose. The Digital Agenda for the Western Balkans launched in 2018 has been supporting the digital transformation and the transition of the region into a digital economy, in order to provide better services to their citizens.<sup>5</sup> It led to the introduction of more national communication,

1 European Commission, Digital Europe Programme Opens to Candidate Countries Montenegro, North Macedonia, Albania, and Serbia to Access Calls for Funding, <https://digital-strategy.ec.europa.eu/en/news/digital-europe-programme-opens-candidate-countries-montenegro-north-macedonia-albania-and-serbia> (accessed December 28, 2023).

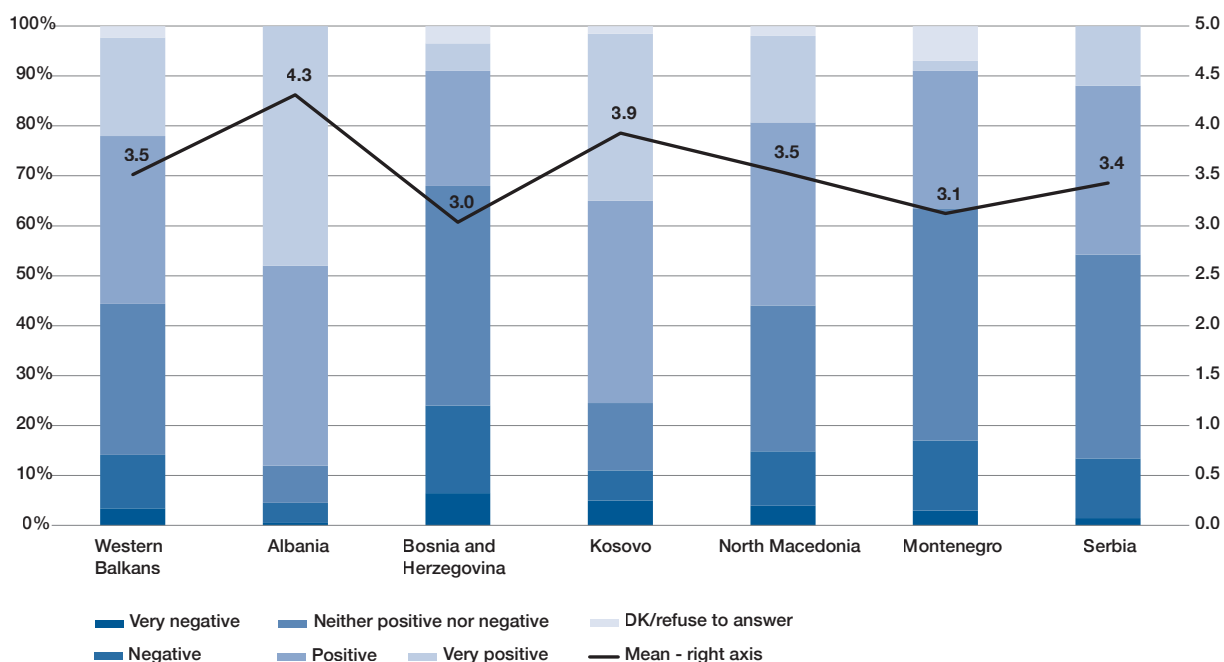
2 European Commission, European Neighbourhood Policy and Enlargement Negotiations. Strategy and Reports, [https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports\\_en](https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en) (accessed December 8, 2023).

3 Gordon Thomas, “E-government: Introduction,” in: ERCIM News No. 48, January, 2002, [https://www.ercim.eu/publication/Ercim\\_News/enw48/intro.html](https://www.ercim.eu/publication/Ercim_News/enw48/intro.html) (accessed November, 22 2023).

4 Svard Proscovia, “E-government Development and its Impact on Information Management,” in: Ruth Rikowski, ed., Enterprise Content Management, Records Content Management, Records Management and Information Culture amidst E-government Development, Witney: Chandos Publishing, 2017, 25-33.

5 European Commission, “European Commission Launches Digital Agenda for the Western Balkans”, 25 June 2018, [https://ec.europa.eu/commission/presscorner/detail/es/IP\\_18\\_4242](https://ec.europa.eu/commission/presscorner/detail/es/IP_18_4242), (accessed November 22, 2023).

Figure 1: Perception of Government Effort in Digitalization of Public Services<sup>6</sup>



Source: Regional Cooperation Council, 2022.

legislation, and infrastructure, in order to create space for successful digital transformation. Four years later, the digitalization of service delivery in the region is still moderate. According to the Regional Cooperation Council (RCC)<sup>7</sup> digitalization of public services in the Western Balkan countries is assessed with an average score of 3.5 (on a scale of 1 negative to 5 very positive). Still, there are differences among WB countries: perceptions of the government efforts in public services digitalization range from 4.3 in Albania to 3.0 in Bosnia and Herzegovina (Figure 1).

In North Macedonia, the digital era also started in 2018, with the introduction and adoption of national strategies and action plans for public administration reform, open data, and cyber security, as well as aligning the current legislation for procurements. Also, ample digital infrastructure has been built to

provide digital government services to citizens and businesses, such as portals for open data, customs administration, registration and management of medicines, searching and issuing of trade and transit licenses and tariff quotas, personal income taxes, as well as a system for processing customs declarations.

### Case Study: Digitalization of the Para-fiscal Charges in North Macedonia

Non-tax revenues are part of the national and local budget, collected in a different way than taxation of the income, wealth, and profit or spending of the economic agents.<sup>8</sup> Typically, non-tax revenues encompass a variety of charges such as administrative fees, license and permit issuance charges, payments for public goods and services, fines, concessions, revenue from state property sales, and donations.<sup>9</sup> Certain non-tax fees may be imposed on companies

6 The question is “How do you perceive the following factors related to government conduct, based on your experience or of other investors that you have heard of? – Digitalization of public services” (All respondents – N=1203, scores are on a scale of 1 to 5 where 1 means very negative and 5 very positive, share of total in %)

7 Regional Cooperation Council, Balkan Barometer 2022. Business Opinion, June, 2022, <https://www.rcc.int/pubs/140/balkan-barometer-business-opinion-2022> (accessed 22 November 2023).

8 Mourre Gilles and Reut Adriana, Non-Tax Revenue in the European Union: A Source of Fiscal Risk?, European Commission, February, 2017, [https://economy-finance.ec.europa.eu/system/files/2017-03/dp044\\_en\\_0.pdf](https://economy-finance.ec.europa.eu/system/files/2017-03/dp044_en_0.pdf) (accessed November 22, 2023).

9 Petreski Blagica and Petreski Marjan, Exploratory Analysis of the Para-fiscal Charges for the Small and Medium-sized Enterprises in the Republic of North Macedonia, Finance Think – Economic Research & Policy Institute, 2019, <https://www.financethink.mk/wp-content/uploads/2020/10/Parafiskalni-studija.pdf> (accessed December 8, 2023).

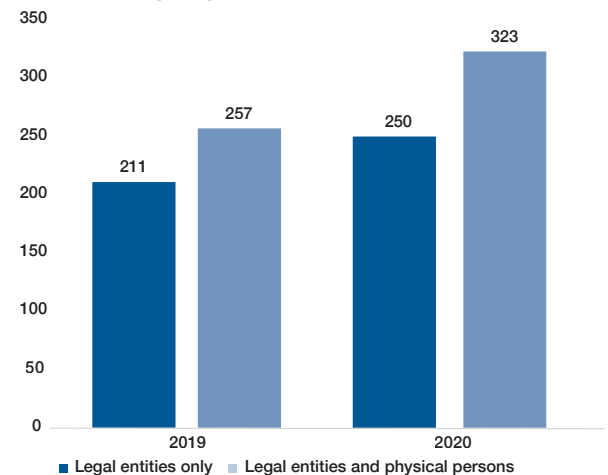
and citizens without offering any corresponding rights. Additionally, there are instances where charges for state or local government services exceed the actual value of the service provided. As per Petreski and Petreski (2019), “para-fiscal charges (PFC) are part of the non-tax charges towards the state and the local self-government, which fulfill one of these two conditions: i) they do not transfer any right to the payer, although they do not represent a tax, and they do not provide any service, or ii) they transfer a right or provide a service to the payer, but the price of which exceeds the value of the service multiple times.”<sup>10</sup>

Both national authorities and local self-governments collect para-fiscal charges for issuing permits, licenses, certificates, approvals, and authorizations, fees associated with registering a legal entity, for displaying business names, patents, trademarks, etc.<sup>11</sup> At the national level, in 2022, there were 250 para-fiscal charges for legal entities and 323 charges for both, legal entities and physical persons, listed on the Ministry of Information Society and Administration (MISA) e-Services portal.

Although one of the key goals of the Economic Reform Program of the government is streamlining and optimization of para-fiscal charges, the number of para-fiscal charges has increased. The data from the MISA e-platform, recorded an increase of 39 charges for legal entities and 66 charges for both legal entities and individuals. Over three years, there was an 18.5 percent increase in non-tax payments for legal entities and a 25.7 percent increase for both legal entities and individuals (Figure 2). The nature of this increase – whether it involves new public services or additional verification of existing services from the public sector– is not specified. Beyond the fees outlined in the e-platform/catalogue, public authorities and professional organizations may impose additional para-fiscal charges. This indicates that the importance of the digitalization of e-Services is multifold: 1) it is directly

linked to transparency, 2) access to data could be used for progress evaluation, and 3) its foresight is a driving force for competitiveness.

**Figure 2: Overview of the Para-fiscal Charges Listed at the Registry of the MISA in 2019 and 2022**



Source: Stojkov et al., 2023.

The number and base of the para-fiscal charges collected by the local self-governments are unknown. Within the EU-funded project implemented in the period 2021-2023, Finance Think for the first time mapped the para-fiscal charges in 18 out of 80 municipalities in North Macedonia. 408 non-tax charges were identified in 18 municipalities, but only 199 were classified as para-fiscal charges based on the defined criteria.<sup>12</sup> The largest number of para-fiscal charges (83%), which include utility fees, educational fees, and construction land development fees, were prescribed by law and by a decision of the Council of the Municipality adopted pursuant to the law.<sup>13</sup> Only one percent of the para-fiscal charges were prescribed by an internal act – a decision of the Council of the Municipality, while 16 percent, like the administrative fees, the tourist tax, and the environmental permit, were prescribed according to current legislation.<sup>14</sup> However, the local para-fiscal charges are not part of any e-platform or register, affecting their transparency, but also companies’ competitiveness.

10 Ibid.

11 Nikolovska Irena, Stojkov Aleksandar and Blagica Petreski Blagica, Study on Para-fiscal Charges at National and Local Level in the Republic of North Macedonia, Finance Think – Economic Research & Policy Institute, March, 2023, <https://www.financethink.mk/wp-content/uploads/2023/05/Para-fiscal-charges-policy-EN.pdf> (accessed December 8, 2023).

12 Ibid.

13 Ibid.

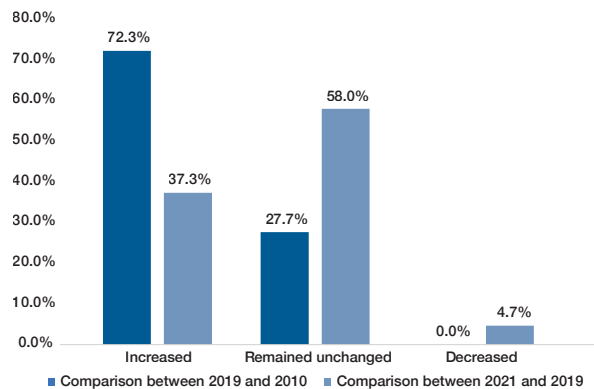
14 Ibid.

Para-fiscal charges are a significant burden for the business sector in North Macedonia. They create both financial and administrative challenges in terms of managing, tracking changes, and correcting potential errors during the application and utilization of services.<sup>15</sup> Concerning distinct burden aspects, the local para-fiscal charges entail a relatively smaller financial burden compared to uncertainties, compliance time, and the multitude of PFC. Conversely, para-fiscal charges to the central government present a different scenario, with the financial burden ranking as the second most substantial, following uncertainties related to PFC (such as the inability to fully comply with regulations and frequent changes). As a result, the resources allocated for managing PFC-related obligations, beyond financial resources, also encompass human resources. Thus, the time invested in submissions, communication with officials, and document preparation is at least equal, and in the case of local government PFC, even greater than the financial resources expended. Considering that only 14 percent of all submissions are handed in electronically, digitalization is seen as a solution to reduce the administrative burden for companies.<sup>16</sup>

Still, there is a positive trend of perception, presented in Figure 3. According to the survey, 58 percent of the companies believe that the PFC remained consistent compared to 2019, while 37 percent perceive an increase. This indicates a shift from the perception in 2019, when a majority of companies believed the PFC had increased. The findings suggest stabilization in the increasing trend, reflecting a heightened awareness among institutions about the impact of para-fiscal charges on businesses. While the introduction of new charges is now approached more cautiously, a comprehensive optimization process has yet to be initiated to the extent that companies feel a substantial reduction in the burden. This trend is also evident in companies' perceptions of how the cost of PFC is determined. A majority of companies (60%) still believe that the

method of price formation lacks transparency and objectivity. However, compared to 2019, there is a slight positive trend indicating a reduction in this percentage, potentially influenced by initiatives such as the commitment to improving the state of PFC, increased efforts to provide information on PFC, and heightened public discourse involving various stakeholders (companies, institutions, think tanks and experts) and media coverage.

**Figure 3: Comparison of Para-fiscal Charges in 2021 vis-à-vis 2019 and 2010**



Source: *Finance Think*, 2023.

As a result, digitalization of the administration of submissions and communication between the submitter and the institution, as a form of optimization was identified as a key recommendation and priority, especially for the local charges.

### Preparedness of the Western Balkans for Digital Transformation

The 2023 Enlargement Package of the European Commission<sup>17</sup> makes several comments on the para-fiscal charges in the WB region. Namely, it elaborates that para-fiscal charges pose a large business environment issue and further burden administrative procedures of businesses. The latest European Commission report for Serbia,<sup>18</sup> highlights that para-fiscal charges are numerous, high in price, non-transparent and lack rationalization. Thus, they undermine the predictability of the tax system and

<sup>15</sup> Ibid.

<sup>16</sup> Petreski et al., 2019.

<sup>17</sup> European Commission, European Neighbourhood Policy and Enlargement Negotiations. Strategy and Reports, [https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports\\_en](https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en) (accessed December 8, 2023).

<sup>18</sup> European Commission, Serbia 2023 Report, SWD(2023) 695 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/serbia-report-2023\\_en](https://neighbourhood-enlargement.ec.europa.eu/serbia-report-2023_en) (accessed December 8, 2023).

can hinder economic development. Based on the Commission’s reports, rationalization of para-fiscal charges is recommended for North Macedonia, Bosnia and Herzegovina, Montenegro, and Serbia.

The 2023 reports for Western Balkan countries identify several challenges regarding public service delivery and digitalization. While some countries like Serbia and Albania have made significant progress in digital transformation and public service delivery, others, such as Bosnia and Herzegovina, are facing challenges and are lagging behind. Regarding interoperability and trust services, all WB6 countries need to align with the European Interoperability Framework and Interoperable Europe Act, while Serbia is encouraged to remain aligned with the Framework.<sup>19</sup>

Albania has been making progress when it comes to digital transformation, with 95 percent of all public services being digitalized, including 2.8 million users, of which 1.5 million are active.<sup>20</sup> The new Digital Agenda for the period 2022 to 2026 was adopted in June 2022.<sup>21</sup> Recently, the Albanian government moved all services online and decided to close all “front desks”.<sup>22</sup> While this is a positive move, it may lower access for citizens with disabilities as well as to people living in rural areas. Considering the latest cyber-attack on government websites, cyber security actions need to be taken to prevent future attacks.<sup>23</sup> Additionally, a new law in electronic identification needs to be adopted.<sup>24</sup>

In Montenegro, public services are reported as “bureaucratic and not user-friendly”.<sup>25</sup> Modest progress

in the digitalization of public services is noted, particularly for services offered to individuals.<sup>26</sup> Currently, there are 403 available e-Services offered on the Montenegrin platform, which is a decrease from 410 services provided in 2021. According to the European Commission, this is due to internal reorganizing related to a previous cyber-attack.<sup>27</sup>

In the case of Kosovo, the EU Progress Report assessed the digitalization of public services at an early stage, although the digitalization process has advanced with 150 fully digitized services provided on the e-platform.<sup>28</sup> However, the Kosovo government still needs to adopt the e-Government Strategy.<sup>29</sup>

In Serbia, significant progress is identified in simplifying administrative procedures and reducing the cost of setting up a company.<sup>30</sup> Also, good progress in digital transformation has been made, with continuous upgrades to the e-Government national portal, offering 340 digital services, with approximately 2 million users.<sup>31</sup> Serbia has also adopted the e-Government Development Program with an Action Plan from 2023 to 2025 and has also implemented the use of e-signatures.<sup>32</sup> Significant progress has been made in the provision of public services, with 386 simplified administrative procedures and 64 newly digitized procedures.<sup>33</sup>

Bosnia and Herzegovina is lagging behind in digital transition, with businesses least satisfied with the digitalization of public services. According to the European Commission, it is still in its early

19 Ibid.

20 European Commission, Albania 2023 Report, SWD(2023) 690 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/albania-report-2023\\_en](https://neighbourhood-enlargement.ec.europa.eu/albania-report-2023_en) (accessed December 8, 2023).

21 Ibid.

22 Ibid.

23 Ibid.

24 Ibid.

25 European Commission, Montenegro 2023 Report, SWD(2023) 694 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/montenegro-report-2023\\_en](https://neighbourhood-enlargement.ec.europa.eu/montenegro-report-2023_en) (accessed December 8, 2023).

26 Ibid.

27 Ibid.

28 European Commission, Kosovo 2023 Report, SWD(2023) 692 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/kosovo-report-2023\\_en](https://neighbourhood-enlargement.ec.europa.eu/kosovo-report-2023_en) (accessed December 8, 2023).

29 Ibid.

30 European Commission, Serbia 2023 Report, 2023.

31 Ibid.

32 Ibid.

33 Ibid.



stages for digital transformation and needs to develop and adopt a Law on electronic identity and trust services.<sup>34</sup> As is the case in most WB6 countries, Bosnia and Herzegovina needs to provide higher incentives to attract the right candidates for work in public administration.<sup>35</sup>

In North Macedonia, the digital service platform provides 392 services, however, it mainly consists of services that are rarely requested and used.<sup>36</sup> Not all services can be completed online, or some are purely informational, which still mandates physical appearance for gaining access to a service. A recommendation is given by the European Commission to improve the functionality and quantity of available e-Services. The ongoing update of the e-portal aims to add 135 services, but the current digital offerings are limited.<sup>37</sup> Improvement is needed in the population register's data quality. Challenges include outdated legislation for interoperability and underutilization of the tool, hindering progress in digital service provision. Moreover, there has been no progress in simplifying administrative procedures, with inconsistent implementation of the law on general administrative procedures.

### Policy Responses in the Western Balkans: Progress and Set-Backs

Although some progress is identified in the Western Balkan countries, key challenges noted in the Progress Reports include the quality of data, the low number of online services, and the need for improvement of infrastructure to ensure digital security and protection of personal data.

The rationalization of the para-fiscal charges would lower the financial and administrative burden of their users, mainly on the business sector. As outlined in the Economic Reform Programme (2022 to 2024) established by the Ministry of Finance of the Republic of North Macedonia, “by reducing the

burden, companies are expected to be more competitive. They could use the saved resources and time for further development and innovation. On the other hand, increased knowledge about para-fiscal duties, as well as the introduction of digital services will contribute to more efficient and effective companies, which will lead to more productive companies.”<sup>38</sup> In general, the predictability of the para-fiscal charges will contribute to a more favorable business environment that will lead to increased investment and entrepreneurship, as well as the formalization of businesses. The increased competitiveness may affect their economic activity and increase the demand for new employment, leaving a positive outcome in the domestic labor market.

One of the key priorities in the Program of the Government of the Republic of North Macedonia for 2023 is the modernization and increased efficiency of the public administration, based on digitalization, enhancement of e-Government, electronic communication between and within institutions, provision of digital services, and design of inclusive and easily accessible platforms. The aim of such digital modernization is the introduction of modern and efficient digital service delivery that would ensure quality, transparent, and fast services for citizens and business entities, improvement of the system for local self-government, and decentralization of power, accountability, and inclusiveness.

Although most of the government institutions at the central and local level have developed systems that offer e-Services to users, all systems have general functionalities such as identification of users and common-general payments, but they are implemented and maintained on a different basis. This is far from economical, because those costs are budgeted by each institution separately, and the total cost at the national level is paid by taxpayers. Additionally, the various and non-unique documents,

34 European Commission, Bosnia and Herzegovina 2023 Report, SWD(2023) 691 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2023\\_en](https://neighbourhood-enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2023_en) (accessed December 8, 2023).

35 Ibid.

36 European Commission, North Macedonia 2023 Report, 2023.

37 Ibid.

38 Ministry of Finance of the Republic of North Macedonia, Economic Reform Programme 2022-2024, January 2022, [https://neighbourhood-enlargement.ec.europa.eu/document/download/504cc56a-60a0-4f36-b7b7-1a2423e6fa59\\_en](https://neighbourhood-enlargement.ec.europa.eu/document/download/504cc56a-60a0-4f36-b7b7-1a2423e6fa59_en), (accessed December 8, 2023).

forms, and processes of submission by business entities require the engagement of dedicated authorized persons with specific training to be able to implement electronic communication within the relevant institutions. The government's dedication to alleviating the administrative workload for users, including citizens and businesses, is impeded by the absence of organized data concerning the required documentation and evidence for service provision.<sup>39</sup> The institutions responsible for the delivery of services maintain these data in different ways, so comparison and analysis are difficult. Moreover, during the transition from conventional to digital services, para-fiscal charges have to remain unaffected.<sup>40</sup>

Regarding the para-fiscal charges, the Government of the Republic of North Macedonia has made some progress in optimization, with ongoing efforts to optimize and consolidate these charges. The Ministry of the Economy is leading coordination in this regard, aiming to streamline 100 selected charges, pending government approval.<sup>41</sup> Work is underway to enhance the e-portal for a more user-centric service delivery, but user engagement remains below expectations, and many services on the portal remain informational and not fully executable online. The Economic Reform Programme of the government of the Republic of North Macedonia 2023-2025 focuses on the rationalization of the para-fiscal charges through activities for optimizing, consolidating, and digitalization.<sup>42</sup> The objective is to streamline non-tax obligations and para-fiscal fees, enhancing their transparency and predictability, ultimately fostering a more conducive business environment.<sup>43</sup> Since 2022, the Ministry of Economy has been the beneficiary of a one-year technical EU project aimed at effectively supporting the development of a methodology for optimizing, consolidating, and rationalizing para-fiscal charges. The goals are to assess the feasi-

bility of reducing or eliminating some of them, to establish a system for introducing new para-fiscal charges, to build a tool (e-portal and/or register) for increasing their transparency, and to build capacities for public institutions, as well as to raise awareness of the private sector.

Businesses continue to highlight the need for simplification of submission of documentation and payment toward public institutions. In Serbia, there are noticeable trends for optimization, digitalization, or discontinuation of administrative procedures.<sup>44</sup> Moreover, a digital public register of administrative procedures was published recently in Serbia as well.<sup>45</sup>

### Regional Cooperation: The Way Ahead

Since their inception in 2018, the Western Balkans Digital Summits are a positive highlight of regional cooperation when it comes to digitalization practices, including public sector innovation and e-Government. So far, six Digital Summits have been organized by RCC, providing much-needed space for collaboration and innovation on digital economy topics among WB6. These Digital Summits have led to the signing of multiple agreements, which include:

- Statement of Support for the Digital Agenda for the Western Balkans;
- Regional Roaming Agreement;
- Agreement on mutual recognition of qualified trust services (between Serbia and Montenegro);
- Memorandum of Understanding on 5G Roadmap for Digital Transformation in the Western Balkans;
- Memorandum of Understanding on Regional Interoperability and Trust Services in Western Balkans Region.<sup>46</sup>

39 Ministry of Finance of the Republic of North Macedonia, Economic Reform Programme 2023-2025, January 2023, <https://finance.gov.mk/wp-content/uploads/2023/02/ERP-2023-2025.pdf>, (accessed December 8, 2023).

40 Stojkov et al., 2023.

41 European Commission, North Macedonia 2023 Report, 2023.

42 Ministry of Finance of the Republic of North Macedonia, Economic Reform Programme 2023-2025, January 2022, chrome-extension://efaid-nbmnnibpcajpcglcfindmkaj/<https://finance.gov.mk/wp-content/uploads/2023/02/ERP-2023-2025.pdf>, (accessed December 8, 2023).

43 Stojkov et al., 2023.

44 European Commission, Serbia 2023 Report, 2023.

45 Ibid.

46 Regional Cooperation Council, Digital Economy, [https://www.rcc.int/priority\\_areas/56/digital-economy](https://www.rcc.int/priority_areas/56/digital-economy) (accessed December 8, 2023).

Regional interoperability and trusted services are of great importance when it comes to regional cooperation in order to speed up the modernization of public administration.<sup>47</sup> This includes mutual recognition of electronic identification numbers (eID) and public and private service accessibility through eIDs. The overall vision of Interoperable Western Balkans is for citizens and businesses to be able to use a wide range of cross-border services and easily sign and validate electronic signatures.<sup>48</sup> So far, eID schemes have been put into place in the Western Balkans but are not often used in practice nationally and even less so across the borders.

Independently, three Western Balkan countries – Albania, North Macedonia, and Serbia – created the Open Balkan Initiative which emerged in 2018. One of the aims of the Open Balkan Initiative is to enable free movement of workers without the need for work permits. This entailed the creation of an electronic identification number (Open Balkan ID), through which citizens of Serbia, North Macedonia, and Albania can work without any administrative barriers. With the creation of prototype electronic platforms, some progress has been made in this regard. However, their deployment has been delayed, as the Open Balkan Initiative seems to be somewhat on hold.

### WB6 Cooperation with the EU: Positive Steps, But Far from the Endpoint

WB6 are still in the early stages of digital integration. Only 9 to 21 percent of the WB population use e-Government services, compared to 59 percent in the European Union.<sup>49</sup> The Digital Agenda for the Western Balkans has an aim to improve the digitalization process, with the support of the EU and RCC.<sup>50</sup>

Additionally, digital infrastructure was incorporated as a standalone sector of the Western Balkan Investment Framework in December 2017, as a response to the adoption of the Multi-annual Action Plan for Regional Economic Area in the Western Balkans.<sup>51</sup> Within this framework, the EU and international financial institutions have been aiding large investments to boost digital infrastructure and improve digital connectivity between WB6. So far, WBIF has allocated 54.2 million EUR in grants for accelerating the region's digital transformation, whereas the whole WBIF investment, including loans, reaches the estimated amount of 640 million EUR.<sup>52</sup> From the WBIF investments that have been realized so far, it can be inferred that most of them are focused on building up necessary infrastructure such as fast broadband connectivity and access to high-speed networks in rural areas. This implies that the WB region still lacks key infrastructure for digitalization. However, these investments can later contribute to larger access to e-Services and e-Government. Moreover, the newly signed association agreements for the Digital Europe Program entail financial support in the amount of 7.5 billion EUR for businesses, public administrations, and other eligible organizations in the period from 2021 to 2027.<sup>53</sup> For this purpose, association agreements within the Digital Europe Program have been signed with Montenegro, North Macedonia, Serbia, and Albania. Kosovo signed the agreement recently, on December 13<sup>th</sup>, 2023<sup>54</sup>, while Bosnia and Herzegovina is still in negotiations for joining the Program.

47 Regional Cooperation Council, Trust and Security, [https://www.rcc.int/priority\\_areas/55/trust-and-security](https://www.rcc.int/priority_areas/55/trust-and-security) (accessed December 7, 2023).

48 Regional Cooperation Council, Regional Interoperability and Trust Services in Western Balkans, November 21, 2021, <https://www.rcc.int/pubs/132/regional-interoperability-and-trust-services-in-western-balkans--methodology-implementation-vision-and-action-plan> (accessed December 8, 2023).

49 WeBalkans, Digitalization, 2020, <https://webalkans.eu/en/themes/connectivity/digitalisation/> (accessed December 7, 2023).

50 Ibid.

51 Western Balkan Investment Framework, Digital Future, <https://www.wbif.eu/sectors/digital-infrastructure> (accessed December 7, 2023).

52 Western Balkan Investment Framework, Factsheet Digital Future, February 2023, <https://www.wbif.eu/storage/app/media/Library/FactSheets/Factsheets%202023/Sector%20Factsheets/04%20Fact%20Sheet%20DIGITAL%202023%20-%20feb%2027%202023.pdf> (accessed December 7, 2023).

53 European Commission, Digital Europe Programme Opens to Candidate Countries Montenegro, North Macedonia, Albania, and Serbia to Access Calls for Funding, <https://digital-strategy.ec.europa.eu/en/news/digital-europe-programme-opens-candidate-countries-montenegro-north-macedonia-albania-and-serbia> (accessed December 28, 2023).

54 Genta Hodo, "Kosovo to Join EU's Digital Europe Programme," in: SeeNews, December 13, 2023, <https://seenews.com/news/kosovo-to-join-eus-digital-europe-programme-843026> (accessed December 28, 2023).

## Conclusion and Recommendations

The digital evolution of society and economy is radically changing service delivery practices. The new methods to offer services have raised citizens' and private sectors' expectations regarding the delivery of public services. Hence, governments should focus on mapping and understanding citizens' and businesses' needs in order to design and deliver public service strategies, where the use of digital technologies is assumed as an integrated part of the governments' modernization process.

The delivery of public services online enables governments to provide more accessible and convenient services for citizens and businesses. Services such as employment and education services, access to different certificates and permissions, and benefit claims can be completed through digital platforms, reducing the need for in-person visits. Unlike physical offices, the digital ones are open 24/7, and have even been open during the lockdowns in the COVID-19 pandemic. Digital interactions can be more efficient and can alleviate the administrative workload for businesses.<sup>55</sup> Digitalization also boosts the productivity and frees resources for other priorities. Public servants also benefit from digitalization through decreased repetitive tasks and a higher level of job satisfaction.<sup>56</sup>

The Action Plan for a Regional Economic Area and the Digital Agenda for the Western Balkans have laid the foundations for economic and digital integration in the region. The Western Balkans Digital Summit is a positive highlight for sharing knowledge and experiences regarding digital services for citizens and businesses. By engaging in informative discussions and enhancing collaboration, Western Balkan countries will boost their progress toward digital transformation and economic growth.

It therefore should be recommended that the EU:

- Provides technical and financial assistance in the area of digitalization of public services;

- In that regard, it should also enable quality capacity building for public administration for the use and implementation of public digital services.

Western Balkan governments should:

- Adopt the recommendations provided in the European Commission Country Reports;
- Better rationalize and digitalize the administration of para-fiscal charges and improve the communication between the submitter and the institutions, as well as between institutions;
- Align with the European Interoperability Framework or enhance the interoperability of digital public service delivery;
- Undertake measures for preventing future cyber-attacks and strengthen cyber resilience of e-Government and e-Service platforms;
- Strengthen the capacities of human resources working in public administration and provide incentives to attract the right candidates for the open positions;
- Take part in regular exchange of information on good practices or successful implementations of digital services and tools;
- Incorporate study visits among governmental institutions or local self-governing units, in order to share successful implementations of digitized services and give guidelines on how good practices can be implemented in the neighboring countries.

It is recommended that Civil Society in the WB and EU:

- Continue the regional dialogue and exchange of knowledge regarding digital public services between WB6 authorities, CSOs, companies, chambers, and academia;
- Continue organizing the Western Balkan Digital Summits, and discuss important topics such as public sector innovation, digitalization, and e-Government.

55 Daub Matthias, Demoyer Axel, Lamaa Abdulkader, and Renz Frauke, *Digital Public Services: How to Achieve Fast Transformation at Scale*. McKinsey & Company, <https://www.mckinsey.com/industries/public-sector/our-insights/digital-public-services-how-to-achieve-fast-transformation-at-scale> (accessed November 22, 2023).

56 Joerg Bueechl, Ralf-Christian Harting, and Mara Schroder, "Influence of Digitalization on Employee Satisfaction in Small and Medium-sized enterprises," in: *Prodecia Computer Science*, 192, 2021, pp. 2753-2760.

# Bridging Progress: Digital Transformation in Western Balkans

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Digitalization has the potential to significantly impact the economic development of the countries of the Western Balkans (WB6: Albania, Bosnia and Herzegovina, North Macedonia, Montenegro, Kosovo, and Serbia). By embracing digital technologies, the WB6 can enhance productivity, attract investment, and improve governance. However, limited digital skills, insufficient infrastructure, and unfit regulatory frameworks are often impediments for realizing the full potential of digitalization. The WB6 must prioritize policies and investments that promote digital innovation and inclusivity to ensure sustainable economic growth in the digital era.

Although the indicators of digital transformation show a positive trend, they are significantly below the average values for the European Union (EU). The WB6 lag behind the EU the most in terms of workforce education and the application of new technologies in company operations. Digital public services are still underdeveloped, and the number of citizens using these services is not sufficient to increase the efficiency of institutions.

## Setting the Stage

The digital transformation is an important component of economic and social development in the WB6 and decisive factor in the WB6 convergence with EU Member States.

The concept of digital transformation in the scientific literature is not unambiguously defined. The broadest understanding of digital transformation “refers to the changes associated with the application of digital technology in all aspects of human society.”<sup>1</sup> In the following, digital transformation is to be understood as: “a fundamental change of a whole new form, function, or structure with the adoption of digital technologies that create new value.”<sup>2</sup>

Digital transformation has great potential to drive sustainable economic growth and promote a better quality of life. Among others, using new digital technologies such as cloud infrastructure, big data analytics, Artificial Intelligence (AI), and the IoT (Internet of Things) allows businesses to reduce costs, while increasing productivity. Fostering innovation and development, digital technologies can also help companies to improve product and service quality as well as sustainability. The deployment of new digital technologies further plays a crucial role in facilitating the transformation and upgrading of industrial structures. In addition, the digital transformation can help optimizing resource allocation, including labor, both on the business as well as macroeconomic level.

1 Mark Baker, *Digital Transformation*, Buckingham: Buckingham Business Monographs, 2014, 19.

2 Cheng Gong and Vincent Ribiere, “Developing a Unified Definition of Digital Transformation”, in *Technovation*, 2021, 102: 102217.



Ljubiša Mičić (2017) takes a closer look at the technological map of Europe, which compares Gross Domestic Product (GDP) per capita and ICT spending. She found that those countries which have invested more in ICT (Information and Communications Technology) also experience higher degrees of economic growth.<sup>3</sup> These findings come with a caveat, however: it cannot be said with certainty that higher economic growth is primarily the result of the positive impact of digital transformation and not of some other macroeconomic factors.

Mihaela Brindusa Tudose et. al. (2023) went a step further by conducting an econometric analysis to quantify the impact of digital transformation on economic and social outcomes, using a sample of 46 countries. To capture digital transformation, the authors used the Network Readiness Index (NRI), which encompasses: “technology (access, content, and future technologies), people (individuals, businesses, and governments), governance (trust, regulation, and inclusion), and impact (economy, quality of life, and contribution to sustainable development goals).” The authors found that NRI has a positive and significant impact on GDP per capita.<sup>4</sup>

Several other studies come to similar conclusions, including Bocean et. al. (2023). The authors found that countries with a high level of digital transformation are more likely to have recorded high economic growth rates per capita as well as embraced sustainability principles.<sup>5</sup>

Aneta Elenkova Marichova and Dafina Georgieva Doneva (2023) took a closer look at another important aspect of the economy: material consumption and resource productivity (GDP per unit of domestic material consumption). Focusing on nine

countries – Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Greece, North Macedonia, Romania, Serbia, and Slovenia – the authors find a link between the digitization process and increasing resource productivity.<sup>6</sup>

The digital transformation also positively impacts the labor market. Thus, it can trigger job creation by the emergence of new occupational profiles as well as by increasing demand for technology-based products and services. Robert Ivanschitz and Daniel Korn (2017) looked specifically at cloud computing and its impact on employment. They found that the spread of cloud computing stimulated demand for new occupations. In addition, businesses could reallocate resources and boost employment in other sectors.<sup>7</sup>

Despite these potential benefits, the impact of digitalization on the economic development of the WB6 is not without challenges. Limited digital skills and education, particularly in rural areas, pose a significant barrier to the adoption and utilization of digital technologies. The digital divide between urban and rural areas, as well as between different socio-economic groups, needs to be addressed to ensure inclusive growth. The same holds true for job loss for low-skilled routine workers through automation. In addition, digitalization, such as the application of Artificial Intelligence (AI), increases the consumption of electricity and raw materials such as Rare Earth, while leading to more e-waste.<sup>8</sup> Moreover, the lack of sufficient regulatory frameworks and investment in digital infrastructure hinders the full realization of the potential benefits of digitalization.<sup>9</sup>

3 Ljubiša Mičić, “Digital Transformation and Its Influence on GDP,” in: *Economics*, 5(2), 2017, 135-147.

4 Mihaela Brindusa Tudose, Amalia Georgescu, and Silvia Avasilcăi, “Global Analysis Regarding the Impact of Digital Transformation on Macroeconomic Outcomes,” in: *Sustainability*, 15(5), March 2023, 4583.

5 Claudiu George Bocean and Anca Antoaneta Vărzaru, “EU Countries’ Digital Transformation, Economic Performance, and Sustainability Analysis,” in: *Humanities and Social Sciences Communications*, 10, 875, 2023, <https://www.nature.com/articles/s41599-023-02415-1#citeas> (accessed February 29, 2024).

6 Aneta Elenkova Marichova and Dafina Georgieva Doneva, “Role of Digitalization to Increase Resource Productivity (Balkan Cluster Case Study),” in: *Global Journal of Engineering and Technology Advances*, 16(02), August 2023, 256–265.

7 Robert Ivanschitz and Daniel Korn, “Digital Transformation and Jobs: Building a Cloud for Everyone,” in: *University of Miami Inter-American Law Review*, 49(1), 2017, 41-50.

8 Johanna Pohl and Matthias Finkbeiner, “Digitalisation for Sustainability? Challenges in Environmental Assessment of Digital Services,” in: *INFORMATIK*, 2017, 1-6.

9 Agim Zuzaku and Blerton Abazi, “Digital Transformation in the Western Balkans as an Opportunity for Managing Innovation in Small and Medium Businesses-Challenges and Opportunities,” in: *IFAC-PapersOnLine*, 55 (39), 2022, 60-65.

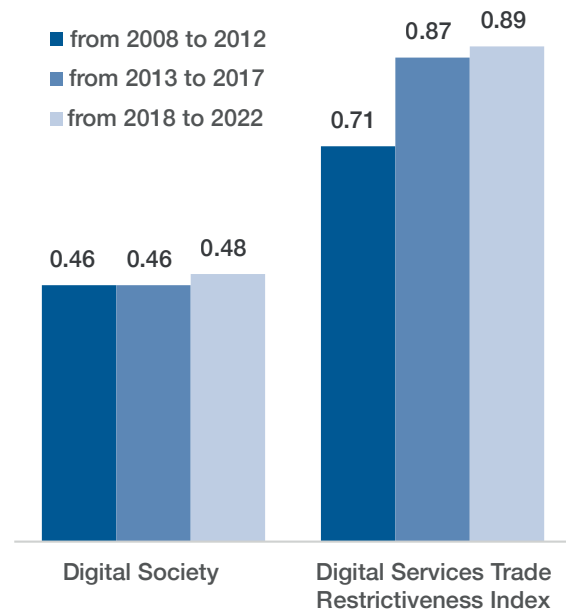
Whether or not the WB6 will succeed in fully realizing the potentials of digital transformation while tackling its challenges will have a considerable impact on convergence between the region and the EU Member States.

### Digital Transformation in the WB6

Where do the WB6 stand on digitalization? According to the scoreboard of the Organisation for Economic Cooperation and Development, which analyses the level of economic convergence of the Western Balkans with the European Union and the OECD, there is still a considerable gap between the region and the EU regarding GDP. Regional GDP per capita stood at only 38 percent of the EU average in 2022. The OECD compiled several indicators on digitalization, showing the WB6 regional performance relative to the EU and the OECD. In the OECD index, “1” is awarded for the OECD good policy practices, standards, and tools. Overall, performance of the WB6 has been largely positive. The WB6 stood at 0.61 regarding fixed broadband internet penetration (subscriptions per 100 people), 0.96 on mobile cellular penetration (subscriptions per 100 people), 0.69 on individuals having made digital payments (% of population), and 0.63 on ICT (information and communication technologies) specialists in total employment (% of employment). Progress in the Competitiveness Outlook’s Digital Society dimension was less pronounced. The index volume stood at 0.48 for the period 2020-2022 (2016-2017: 0.46). The highest values of the Digital Society Index were recorded in Serbia (0.60) and Montenegro (0.54), while Bosnia and Herzegovina is below the average for the Western Balkans with an index value of 0.34. Particularly pronounced was the gap between the WB6 and the EU/OECD regarding skills: the score stood at only 0.29 for individuals with basic or above basic digital skills, showing no positive trajectory.<sup>10</sup>

The WB6 performed somewhat better on the Digital Services Trade Restrictiveness Index (STRI). The STRI identifies, catalogues, and quantifies bar-

**Figure 1: Economic Convergence of the Digitalization in the WB6 (compared to the EU and OECD average)**



OECD index, “1” is awarded for the OECD good policy practices, standards, and tools.

Source: OECD, 2023.

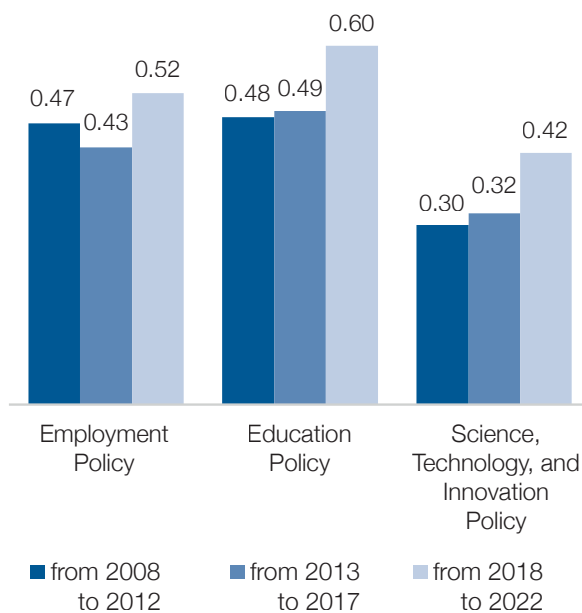
riers that affect trade in digitally enabled services. While the index stood at 0.84 in the period 2016-2017, it improved to a value of 1.38 for the period 2020-2022. Bosnia and Herzegovina recorded the lowest Digital Services Trade Restrictiveness Index value of 0.39, followed by Serbia with an index value of 0.77. The other countries of the Western Balkans realized an index value higher than the OECD good policy practices, standards, and tools score of 1, standing at 1.38.<sup>11</sup>

Regarding skills, the OECD takes a closer look at several indicators, including employment policy, education policy, and science, technology and innovation policy. Although there is a positive trend according to these indicators, the WB6 are significantly behind the EU and OECD countries, especially in terms of science, technology and innovation policy (Figure 2). The reason for the low value of this indicator is primarily the result of insufficient investments in research and development in

<sup>10</sup> OECD, Economic Convergence Scoreboard for the Western Balkans 2023, Paris 2023, <https://www.oecd.org/south-east-europe/ECS-Policy-Paper-2%20web-1.pdf> (accessed January 4, 2024), 6.

<sup>11</sup> OECD, 2023.

**Figure 2: Economic Convergence of the Skills in the WB6 (compared to the EU and OECD average)**



Source: OECD, 2023.

all countries of the Western Balkans. Lower values in terms of education policy compared to average values in OECD countries are, among others, the result of the lack of a concept for lifelong learning in the Western Balkans. Significantly lower employment policy values are a consequence of the low productivity of workers and their contribution to the creation of added value.<sup>12</sup>

Overall, here is little divergence among the WB6 regarding these three indicators, with few exceptions. Kosovo lags behind considerably on the first and third indicator. Bosnia and Herzegovina and Albania scored below the WB6 average in the third indicator. On the index of Employment Policy, the following scores are achieved for the period 2020-2022: Albania: 0.56; Bosnia and Herzegovina: 0.40; Kosovo: 0.32; Montenegro: 0.60; North Macedonia: 0.66; Serbia: 0.56. On employment policy the countries scored in the following way:

Albania: 0.66; Bosnia and Herzegovina: 0.42; Kosovo: 0.64; Montenegro: 0.64; North Macedonia: 0.58; Serbia: 0.64. On education policy, and science, technology and innovation policy the following scores were realized: Albania: 0.36; Bosnia and Herzegovina: 0.26; Kosovo: 0.26; Montenegro: 0.48; North Macedonia: 0.48; Serbia: 0.62.<sup>13</sup>

Only 35 percent of individuals in the WB area had at least rudimentary digital abilities in 2021, despite the fact that 85 percent of people had accessed the internet. The WB area is experiencing a general lack of ICT professionals compared to the EU labor market. In 2021, there were just 2.6 percent of working adults who were ICT specialists. The greatest percentages of hired ICT experts were recorded in Serbia (3.6%) and Albania (3.6%). Another serious problem is the lack of gender parity; women account for only 16 percent of ICT professionals in the WB region (2021), which is about the same as in the EU, but well below gender parity. There is a noticeable improvement in the status of female ICT experts in North Macedonia (24%), Serbia (24%), and Albania (28%).<sup>14</sup>

Only three percent of companies in the Western Balkans region used at least one artificial intelligence (AI) technology, which is significantly below the European average of 7.9 percent. Albania, North Macedonia, and Kosovo reported having an above-average share of businesses utilizing AI compared to other WB countries.<sup>15</sup>

The COVID-19 pandemic has forced the countries of the WB6 to rapidly digitize public services. Nonetheless, the WB6 lag behind the EU regarding digital public services. Serbia has the highest score (42.1), followed by Albania (35.6), and North Macedonia (32.4), both of which have scores higher than the WB6 average (32.1). However, these achievements are much lower than the EU average (67.3).<sup>16</sup>

<sup>12</sup> OECD, 2023.

<sup>13</sup> Ibid.

<sup>14</sup> Regional Cooperation Council, Western Balkans Digital Economy Society Index, WB DESI 2022 Report, December 2022, <https://www.rcc.int/pubs/159/western-balkans-digital-economy-society-index-wb-desi-2022-report> (accessed January 15, 2024). See also: Zoran Jordanoski, Morten Meyerhoff Nielsen, "Measuring the Digital Economy and Society: A Study on the Application of the Digital Economy and Society Index in the Western Balkans," in: Proceedings of the 14th International Conference on Theory and Practice of Electronic Governance, 2021, 190-197.

<sup>15</sup> Ibid.

<sup>16</sup> Ibid.

The percentage of internet users in the WB area who interacted with the public administration online in 2021 was roughly 35 percent, a considerably lower percentage than the EU average of 65 percent. In 2021, Serbia (43%) and Albania (40%) had the highest percentages of users of e-Government services.<sup>17</sup>

All countries of the WB6 have adopted national strategies for the digital transformation. Nonetheless, overall progress has been slow. Overall, the biggest problem is insufficient investment in digital infrastructure and education of the population for IT needs (although in recent years, significantly larger funds have been allocated in all the countries of the WB6).<sup>18</sup>

### Regional Cooperation in the Western Balkans

While the countries of the Western Balkans score differently regarding the various indicators of digital transformation, they have been converging in recent year.<sup>19</sup> In order for this trend to continue, it is necessary to strengthen regional integration and cooperation (in tandem with EU integration) through new initiatives and policies. This promises many benefits such as efficiency gains and cost savings. Apart from reduced roaming charges between the WB and the EU, cooperation can foster digital workforce development, improve the exchange of both personal and non-personal data, and boost cyber resilience. Regional integration and cooperation is particularly important for small economies as this allows them to better realize economies of scale.<sup>20</sup>

One important component of regional cooperation is the Western Balkans Digital Summit, which was initiated as part of the Berlin Process. It provides a framework for high-level regional discussion on digital transformation and coordination for EU accession of the region.<sup>21</sup>

The Regional Cooperation Council (RCC) plays an important role for digital transformation in the region and convergence between the WB6. As such, the RCC fosters regional capacities for creating digital skill strategies and for developing a sustainable regional framework to support digital upskilling. The RCC also facilitated the Regional Roaming Agreement, which the WB6 signed in 2019, enabling Roaming Free Western Balkans as of 1 July 2021. The RCC further published the Western Balkans Digital Economy Society Index, which provides important guidance for informed policy-making. The RCC also co-organizes the Digital Summits.

Another important initiative to mention is the Open Balkan initiative: “the concept of regional cooperation was raised to a new level by introducing concrete measures in the fields of infrastructure, trade, investment, mobility, and digitalization.”<sup>22</sup> The initiative includes Albania, North Macedonia, and Serbia and supports the adoption of policies and concrete measures.<sup>23</sup> Among the first is the free movement of labor between these three countries, which was supposed to be implemented by the end of 2021. However, the practical implementation of the agreement and registration as an e-citizen has been postponed until March 2024.<sup>24</sup>

17 Ibid.

18 Christian Rupp, Jana Belcheva Andreevska, and Verena Weixlbraun, Empowering Progress: Unveiling the Digitalization Maturity in Western Balkan and Moldova Local Governments with Best Practices and Potentials, Network of Associations of Local Authorities of South-East Europe (NALAS), <http://www.nalas.eu/digitaltransitionreport/> (accessed February 19, 2024).

19 Tanja Broz, Goran Buturac, and Miloš Parežanin, “Digital Transformation and Economic Cooperation: The Case of Western Balkan Countries,” in: *Zbornik radova Ekonomskog fakulteta u Rijeci: časopis za ekonomsku teoriju i praksu*, 38(2), 2020, 697-722.

20 Digital WB6+ Initiative, The Impact of Digital Transformation on the Western Balkan – Tackling the Challenges towards Political Stability and Economic Prosperity, [https://www.eizg.hr/userdocsimages/vijesti/vijesti\\_dogadaji/dt\\_studija/wb6-policy-paper.pdf](https://www.eizg.hr/userdocsimages/vijesti/vijesti_dogadaji/dt_studija/wb6-policy-paper.pdf) (accessed February 23, 2024).

21 Petar Mrdović, The Role of Digitalisation in Transforming Western Balkan Societies, ÖGfE Policy Brief 14 2023, Österreichische Gesellschaft für Europapolitik, July 2023, <https://www.oegfe.at/wp-content/uploads/2000/12/PB-142023.pdf> (accessed February 23, 2024).

22 Chamber of Commerce of Serbia, Joint Declaration (by The President of the Republic of Serbia, Prime Minister of the Republic of Albania and the Prime Minister of the Republic North Macedonia) on Implementing the EU Four Freedoms in the Western Balkans, [https://api.pks.rs/storage/assets/Deklaracija\\_Novi\\_Sad1.pdf](https://api.pks.rs/storage/assets/Deklaracija_Novi_Sad1.pdf) (accessed February 23, 2024).

23 Ibid.

24 Intermark Group, Free Access to the Labor Market within the Open Balkan, <https://intermarkrelocation.com/news/immigration/free-access-to-the-labor-market-within-the-open-balkan/> (accessed February 23, 2024).

The Open Government Partnership (OGP) also plays an important role in the WB6 region. Founded in 2011, it brings together 75 countries including the five countries of the WB Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia. The goal of the initiative is to “promote open government, empower citizens, fight corruption and harness new technologies to strengthen governance.” It does so by fostering concrete commitments from national and subnational governments. As part of the OGP initiative, the countries of the Western Balkans adopted National Action Plans in which they defined policies regarding the development of digital technologies and digital transformation. However, according to the country reports for the period until 2022, all Western Balkans countries showed inconsistency in the implementation of policies regarding the development of digitization. Less than half of the planned activities have been implemented. New goals and policies until 2025 were defined within the National Action Plans.<sup>25</sup>

### Analysis of the Cooperation with the EU

The EU and the WB6 are pursuing a multitude of joint projects on digitalization. At the heart of EU-WB6 cooperation stands the Digital Agenda for the Western Balkans.

The Digital Agenda for the Western Balkans was launched by the European Commission in 2018. Together with ministers of the WB6, the Commission committed to 1. invest in broadband connectivity, 2. increase cybersecurity, trust, and digitalization of industry, 3. strengthening the digital economy and society, and 4. boosting research and innovation. The EU also pledged €30 million in EU grants under the Western Balkan Investment Framework (WBIF) for broadband infrastructure.<sup>26</sup> This Declaration also opened up the Digital Opportunity

Traineeship and EU Code Week for the WB6, which promotes coding skills and digital literacy. Efforts to strengthen cybersecurity, e-Government, and e-Health are underway to advance the region’s digital transformation.

However, since its launch in 2018, there has been little follow-up, leaving a gap in EU-Western Balkans engagement.<sup>27</sup>

Since 2020, the European Investment Bank (EIB) has contributed greatly to the region’s digital transformation by investing around 200 million Euros in tech-related initiatives, enhancing 4G and 5G services for businesses. Broadband will be extended to rural areas to bridge the digital divide. Despite high internet penetration in the Western Balkans, digital literacy remains low. Efforts to improve digital skills are crucial. The EU’s Economic and Investment Plan aims to mobilize up to 20 billion Euros over a decade for the region, with the goal to fuel growth with creative financing solutions alongside grants.<sup>28</sup>

In 2020, the European Commission adopted the Economic and Investment Plan for the Western Balkans (EIP) with the goal to boost economic growth and development as well as to support a green and digital transition. The EIP focuses on three key areas of action on Digital Infrastructure:

- Infrastructure for broadband: Projects were to be supported to develop and roll-out national broadband infrastructure, with an emphasis on linking rural communities. This is important as broadband availability is a prerequisite for the effective provision of digital goods and services, including remote healthcare and education. Infrastructure investment in broadband thus holds particular promises to local communities.
- Data centers and cloud infrastructure: Furthermore, projects were to be financed that build

25 Open Government Partnership, Digital Transformation, <https://www.opengovpartnership.org/policy-area/digital-transformation/> (accessed February 19, 2024).

26 European Commission, European Commission Launches Digital Agenda for the Western Balkans, June 25, 2018, [https://ec.europa.eu/commission/presscorner/detail/es/IP\\_18\\_4242](https://ec.europa.eu/commission/presscorner/detail/es/IP_18_4242) (March 1, 2024).

27 European DIGITAL SME Alliance, A New Digital Agenda for the Western Balkans, <https://www.digitalsme.eu/digital/uploads/DIGITAL-SME-Discussion-Paper-A-New-Digital-Agenda-for-the-Western-Balkans.pdf> (accessed January 21, 2024).

28 Matteo Rivellini, “Digital Infrastructure, Regulation and Skills Will Determine the Success of Digital Transformation,” in: European Western Balkans, June 7, 2023, <https://europeanwesternbalkans.com/2023/06/07/digital-infrastructure-regulation-and-skills-will-determine-the-success-of-digital-transformation/> (accessed January 20, 2024).



reliable, secure, and energy-efficient data centers and cloud infrastructure while making sure these complied with EU regulations. Handling data in a secure and trustworthy manner is an important foundation of a sustainable digital economy.

- Digital skills: The EU also committed to foster international collaboration in digital education through the updated Digital Education Action Plan (DEAP). Improving the accessibility of e-learning, especially for marginalized populations like the Roma, and infrastructure spending alone will not be enough if skills are not also invested in.<sup>29</sup>

In June 2023, the European Commission signed an agreement on the inclusion of EU candidate countries in the Digital Europe Program. For the countries of the Western Balkans, this is an additional opportunity to improve cyber security, develop and build digital infrastructure, and adapt their legal frameworks in digitalization to EU regulations.

At the Berlin Process Leaders' Summit in Tirana in 2023, the participants agreed that a Value Chain Partnership between the EU and the Western Balkans should be explored, acknowledging the strategic importance of the WB6 in the context of critical raw materials and batteries. Such a partnership would provide an opportunity for the WB6 to improve economic growth through the exploitation of critical raw materials. The special importance of these raw materials is that they are necessary for the further process of digital transformation at the global and national level.<sup>30</sup>

In summary, the cooperation of the Western Balkans with the EU is significant for all the countries of the WB6. For the countries of the WB6, the EU is the main trading partner, which massively affects their economic growth rates. Funds and various programs and projects financed by the EU support not only digital transformation in the countries of

the WB6, but also other areas of social and economic development. As the countries of the WB6 move closer to EU membership, this cooperation will be more important than ever.

## Conclusion and Recommendations

A shared future is now within reach for the WB6 and the EU. On the one hand, the EU is adamant about seeing the WB6 economies integrated. On the other hand, the WB6 remain steadfastly dedicated to achieving the strategic goal of membership in the EU.

In the WB6, digitalization has led to the emergence of new industries and business models, attracting foreign direct investment, and creating employment opportunities. The development of digital infrastructure, such as high-speed internet connectivity and mobile networks, has facilitated the growth of e-commerce and digital services, contributing to economic growth. Furthermore, digitalization has improved access to information and knowledge, enabling individuals and businesses to make informed decisions. It has also enhanced the efficiency of government services, reducing bureaucracy and corruption. The implementation of digital platforms for public services, such as e-Government and e-Health, has increased transparency and accountability, leading to better governance and public trust. The digitalization of economies has become a crucial factor in the economic development of countries worldwide. The WB6 have repeatedly recognized the significance of digitalization in driving economic growth.

However, the gap between digitalization in the WB6 and the EU shows that much more needs to be done. Economic development in WB6 can be improved through digital transformation in several ways:

- It is necessary to raise the level of digital literacy, especially among the elderly population and

29 European Commission, Economic and Investment Plan for the Western Balkans, 2020, <https://www.wbif.eu/storage/app/media/Library/economic-and-investment-plan-brochure.pdf> (accessed March 1, 2024); WeBalkans, Digitalisation, <https://webalkans.eu/en/themes/connectivity/digitalisation/> (accessed January 20, 2024).

30 Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, Berlin Process Summit 2023 in Tirana, Chairs Conclusions Berlin Process Summit 2023, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-berlin-process-summit-2023\\_1697629712.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-berlin-process-summit-2023_1697629712.pdf) (accessed February 19, 2024).

vulnerable minority groups and in rural areas. There is also a structural mismatch in the IT sector on the labor market. Due to the rapid development of the IT sector in all countries of the Western Balkans, the demand for labor in this sector is much higher than the supply. This can be addressed through mutual cooperation between the WB6 in terms of education and the free movement of the workforce.

- National governments and businesses must pay more attention to cyber security. Cyber attacks can lead to the theft of personal information and cripple the operations of government institutions and private companies. Therefore, there is a need for significantly greater cooperation between the WB6. Unfortunately, very little has been done on this issue, and the citizens of the Western Balkans are exposed to the risk of personal data theft every day.
- It is necessary to increase digital capacities through the construction of new infrastructure through public-private partnerships within the Western Balkans. This may lead to an additional inflow of foreign investors in this sector.
- The application of new technologies in company's operations is at a low level and below the average values for the EU. Although the export of IT services from the WB6 has been growing significantly in recent years, local companies apply new technologies to a very small extent. This may pose a threat to the competitiveness of companies from the WB6 in the competitive EU market and global markets.
- Regional initiatives like the Open Balkan are a good start to create a common market. Unfortunately, this initiative is not sufficiently developed and does not include all WB6. The Berlin Process involves all six countries. Perhaps it would be better if the coordination of the Open Balkans process took place as part of the Berlin process by including the remaining countries in the initiative.
- The rapid development of ICT can lead to an increase in energy consumption. As most of the WB6 still base their energy policy on fossil fuels, this development may threaten sustainability. Thus, digitalization and sustainability should be addressed more in tandem. A sector, which offers particular potential, is the transport sector, which EU officials also recognized as an area where the Digital and Green Agenda can be applied at the same time.
- Including WB6 in the EU Value Chain Partnership would be a good basis for the development of digitization and economic growth of these countries. However, this process should be approached with caution. Due to the liberal policy of attracting investment in the countries of the Western Balkans, multinational companies could take advantage of the poor legal regulations in these countries and endanger the environment in order to get access to rare raw materials. Thus, this process should be monitored in coordination with EU institutions.

In addition to significant allocations that have already been made by the EU for the promotion and development of digital transformation, the EU can help in several other ways:

- The EU should support sound reporting on digital transformation with transparent indicators and regular reports. The Digital Economy and Society Index (DESI) data for the countries of the Western Balkans are available only from 2022 and are often incomplete and unreliable. Including the countries of the WB6 in regular reporting according to the DESI methodology will enable the monitoring of progress of the countries of the WB6, also in comparison with the EU Member States.

# Media Freedom in WB6 Countries – Between Challenges and Solutions

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Media freedom is the ability of individuals and media outlets to operate independently without interference or censorship, fostering diverse perspectives, open discourse, as well as professional and ethical reporting. Professional, objective, and independent journalism is a fundamental prerequisite for Western Balkan countries seeking accession to the European Union (EU). For a long time, this region has been characterized as one with insufficiently independent and professional media, lacking media pluralism. Unfortunately, the public's right to information often takes a backseat to the interests of political elites, who prioritize their party agendas over the broader public interest. This undermines the role of the media as “watchdogs” of democracy. An excess of factors that restrict media freedom and directly impact the financial sustainability and editorial independence of the media, as well as a lack of initiative in addressing these problems, are typical for all Western Balkan countries. Governments do not collaborate on media freedom issues as effectively as media and civil society organizations which have extensive cross-border collaboration. The EU remains the key driver of positive change in this area, but greater pressure on Western Balkan countries is needed to ensure full media freedom and professionalism.

## Setting the Stage

Media and journalists in Western Balkan countries face numerous threats, both verbal and physical, often coming from the highest officials themselves. Pressure is particularly felt by those in the media dealing with topics of corruption and organized crime. Although there have been some improvements in countries where an attack on a journalist is considered an attack on public officials (such as Montenegro<sup>1</sup>), mechanisms for protecting journalists remain very limited, and investigations into previous attacks on journalists have not been effective. All of this has led to the rise of self-censorship, one of the most significant indicators of the decline of media freedom in Western Balkan countries.

The economic unsustainability of media in Western Balkan countries leaves room for the influence of international actors who do not stand behind the principles of the rule of law and respect for diversity. This opens the opportunity for media takeovers by those with sufficient financial means. Often these buyers seek to spread disinformation and propaganda and create information chaos, all with the aim of disrupting the commitment of these countries to continue on the path of European integration. Unfortunately, this occasionally involves backing Russian propaganda outlets Russia Today (RT) and Sputnik, without any government-imposed broadcasting constraints that align with EU policies. This situation is present in Serbia and the political entity of Bosnia and Herzegovina, the Republic of Srpska. Social media platforms and ad hoc-created online portals in Montenegro, not registered in accordance with national legislation, are also used as important chan-

<sup>1</sup> Human Rights Action, Akcija za ljudska prava, Skupština Crne Gore jednoglasno usvojila izmjene KZ-a u cilju jače krivičnopravne zaštite novinara, <https://www.hraction.org/2021/12/29/skupstina-crne-gore-jednoglasno-usvojila-izmjene-kz-a-u-cilju-jace-krivicnopravne-zastite-novinaraf/> (accessed February 5, 2024).

nels for spreading disinformation and propaganda.<sup>2</sup>

Strategic lawsuits against public participation (SLAPPs) pose significant challenges for media in Western Balkan countries. These actions, often filed by powerful individuals or entities, are used as a tool to silence and intimidate journalists and media organizations. The threat of costly legal battles and potential financial ruin can lead to self-censorship among media outlets, hindering investigative journalism and the free flow of information. On the other hand, frequent reliance on financial assistance from the state opens the possibility for governments and politicians to condition their support upon favorable media coverage of their activities. In Kosovo, governmental advertising is prohibited in private media, which reduces potential state influence on editorial policy but also places private media outlets at a disadvantage compared to public broadcasters. In Montenegro, although this issue is well-defined in the 2020 Media Law, in practice, a significant number of public institutions still hide information about fund allocations for media advertising. In North Macedonia, media associations raised the issue of state-funded political advertisements in the media and called for it to be tackled in accordance with practices observed in Europe.<sup>3</sup>

The following paper presents an overview of the most significant challenges facing Western Balkan countries in terms of media freedom.

In the latest report from the European Commission on Albania,<sup>4</sup> key issues include the persistence of negative campaigns, verbal and physical attacks on journalists during the previous reporting period – such as the attacks on Adriatik Doçi,<sup>5</sup> Elvis Hila and his wife,<sup>6</sup> and the gun attack at Top Channel headquarters.<sup>7</sup> Key challenges include the presence of criminalization of defamation, weak legislative framework regulating public-sector advertising in media, and poor working conditions for journalists. According to the latest Reporters Without Borders (RWB) World Press Freedom Index,<sup>8</sup> Albania ranks 96 out of 180 countries. The RWB report notes that government financial support is a significant income source for the media. However, concerns arise regarding to opacity and discrimination in the distribution process. The Freedom House report on Albania<sup>9</sup> points out that prosecutors banned the media from covering the repercussions of a 2022 cyberattack on state institutions.

Bosnia and Herzegovina also faces a range of media freedom issues, particularly evident in the weak judicial protection of journalists and the unstable financial sustainability of public broadcasters at all levels, as highlighted in the latest report by the European Commission.<sup>10</sup> Thus, Bosnia and Herzegovina is the only country that has regressed in terms of freedom of expression. The deepened divide between entities, as well as increased political polarization, have led to different degrees and understandings of media freedom in different parts of the country. The Safe Journalists platform documented

2 European Commission, Montenegro 2023 Report. 2023 Communication on EU Enlargement policy, Commission Staff Working Document SWD(2023) 694 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_694%20Montenegro%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_694%20Montenegro%20report.pdf) (accessed February 5, 2024).

3 European Commission, North Macedonia 2023 Report. 2023 Communication on EU Enlargement policy, Commission Staff Working Document SWD(2023) 693 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_693%20North%20Macedonia%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_693%20North%20Macedonia%20report.pdf) (accessed February 5, 2024).

4 European Commission, Albania 2023 Report. 2023 Communication on EU Enlargement Policy, Commission Staff Working Document SWD(2023) 690 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_690%20Albania%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_690%20Albania%20report.pdf) (accessed November 11, 2023).

5 Safe Journalists, “Actual Attack on Journalist Adriatik Doçi, 13/11/2022, Tirana,” in: Safe Journalists, November 15, 2022, <https://safejournalists.net/reports/actual-attack-on-journalist-adriatik-doci-13-11-2022-tirana/> (accessed November 11, 2023).

6 Safe Journalists, “Actual Attack on Journalist Ervis Hila, 25/01/2023, Lezhe,” in: Safe Journalists, January 26, 2023, <https://safejournalists.net/reports/actual-attack-on-journalist-ervis-hila-25-01-2023-lezhe/> (accessed November 11, 2023).

7 Safe Journalists, “Attacks on Media Outlets and Organisation, Top Channel, 27/03/2023, Tirana,” March 27, 2023, <https://safejournalists.net/reports/attacks-on-media-outlets-and-organisation-top-channel-26-03-2023-tirane/> (accessed November 11, 2023).

8 Reporters Without Borders, Albania, <https://rsf.org/en/country/albania> (accessed November 11, 2023).

9 Freedom House, Freedom in the World 2023. Albania, <https://freedomhouse.org/country/albania/freedom-world/2023> (accessed November 11, 2023).

10 European Commission, Bosnia and Herzegovina 2023 Report. 2023 Communication on EU Enlargement policy, Commission Staff Working Document SWD(2023) 691 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_691%20Bosnia%20and%20Herzegovina%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_691%20Bosnia%20and%20Herzegovina%20report.pdf) (accessed November 11, 2023).

31 cases<sup>11</sup> of attacks on journalists, including physical assault, threats, and intimidation in 2022. In the Republic of Srpska, defamation became a criminal offense in August 2023, limiting freedom of expression and media. According to the latest Reporters Without Borders World Press Freedom Index,<sup>12</sup> Bosnia and Herzegovina is ranked 64 of 180 countries.

In Kosovo, persistent worries exist regarding physical aggression, threats, smear campaigns, and hate speech specifically aimed at journalists, especially in the north of Kosovo, as highlighted in the latest European Commission report.<sup>13</sup> In 2022, the Association of Journalists in Kosovo reported 33 cases of intimidation, threats, and attacks against journalists.<sup>14</sup> One key criticism is the discrepancy between the law on the Radio and Television of Kosovo and the law on the Independent Media Commission with the EU's Audiovisual Media Services Directive. Kosovo is ranked 56 out of 180 countries on the Reporters Without Borders World Press Freedom Index.<sup>15</sup> The RWB report states that the media scene is divided along ethnic lines.

The media scene in Montenegro is deeply polarized, with unresolved attacks on journalists and media property, and a weak self-regulation system. The European Commission report notes no progress in investigations into the 2004 murder of Duško Jovanović and the 2018 shooting attack on investigative journalist Olivera Lakić.<sup>16</sup> Despite the public service having a balanced editorial policy,

the report takes note of the reappointment of Boris Raonić as Director-General of Radio Televizija Crne Gore (RTCG) despite a legally binding court decision deeming his previous appointment unlawful. The report calls for the adoption of media legislation in accordance with the EU acquis. Montenegro is ranked 39 out of 180 countries, according to the latest Reporters Without Borders World Press Freedom Index.<sup>17</sup>

Regarding North Macedonia, both the European Commission report<sup>18</sup> and the Reporters Without Borders World Press Freedom Index<sup>19</sup> note a generally improved environment for the work of journalists and media. However, attacks and threats against media outlets and journalists persist. The Ministry of the Interior recorded 17 cases of attacks against journalists in 2022.<sup>20</sup> The European Commission has called for the implementation of a strategy to reform the public broadcaster and finalize appointments for the program council and media regulator's council. The RWB report highlights low reliability of the most-watched TV stations. That is why it is important to establish Makedonska radio-televizija (MRT) as a professional, sustainable, and financially independent public service. North Macedonia is ranked 38 out of 180 countries in the latest Reporters Without Borders World Press Freedom Index.<sup>21</sup>

In Serbia, recent amendments to media laws have lifted restrictions on state-owned providers becoming media owners and holders of media licenses, al-

11 Safe Journalists, Napadi na novinare, <https://safejournalists.net/napadi-na-novinare/?lang=bs> (accessed November 11, 2023).

12 Reporters Without Borders, Bosnia-Herzegovina, <https://rsf.org/en/country/bosnia-herzegovina> (accessed November 11, 2023).

13 European Commission, Kosovo 2023 Report. 2023 Communication on EU Enlargement policy, Commission Staff Working Document SWD(2023) 692 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_692%20Kosovo%20report\\_0.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_692%20Kosovo%20report_0.pdf) (accessed November 11, 2023).

14 Association of Journalists of Kosovo, Case Search, <https://agk-ks.org/en/case-search/?keywords=&city=&ngakush=&gjinia=&year=2022&llojiiimedias=&llojiiincidentit=&ppublik=&gjyqesor=&pligjor=&search=1> (accessed November 11, 2023).

15 Reporters Without Borders, Kosovo, <https://rsf.org/en/country-kosovo> (accessed November 11, 2023).

16 European Commission, Montenegro 2023 Report. 2023 Communication on EU Enlargement policy, Commission Staff Working Document SWD(2023) 694 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_694%20Montenegro%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_694%20Montenegro%20report.pdf) (accessed November 11, 2023).

17 Reporters Without Borders, Montenegro, <https://rsf.org/en/country/montenegro> (accessed November 11, 2023).

18 European Commission, North Macedonia 2023 Report. 2023 Communication on EU Enlargement policy, Commission Staff Working Document SWD(2023) 693 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_693%20North%20Macedonia%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_693%20North%20Macedonia%20report.pdf) (accessed November 11, 2023).

19 Reporters Without Borders, North Macedonia, <https://rsf.org/en/country/north-macedonia> (accessed November 11, 2023).

20 European Commission, North Macedonia 2023 Report. 2023 Communication on EU Enlargement policy, Commission Staff Working Document SWD(2023) 693 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_693%20North%20Macedonia%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_693%20North%20Macedonia%20report.pdf) (accessed December 21, 2023).

21 Reporters Without Borders, North Macedonia, <https://rsf.org/en/country/north-macedonia> (accessed November 11, 2023).



lowing the state to control private media through Telekom Srbija.<sup>22</sup> Media freedom is eroding due to lawsuits or criminal allegations against journalists, direct intimidation, threats, and pervasive self-censorship. The latest European Commission report<sup>23</sup> calls for strengthening journalist safety and urges government officials to refrain from defamation and verbal attacks on journalists. The Freedom House report on Serbia<sup>24</sup> recorded 137 attacks on journalists in 2022. The Court of Appeals initiated a new trial for the murder of Slavko Ćuruvija, concluding proceedings in March 2023. In February 2024, a Serbian court acquitted four officers accused of participating in the assassination of Ćuruvija, which led to protests in Belgrade.<sup>25</sup> The Serbian Regulatory Authority of Electronic Media (REM) failed to demonstrate autonomy, especially in determining the allocation of national broadcast frequencies. Serbia is ranked 91 out of 180 countries in the latest Reporters Without Borders World Press Freedom Index.<sup>26</sup>

### One Step Forward, Two Steps Back

Legal and regulatory barriers in the Western Balkan countries delay the improvement of media professionalism, and without positive encouragement from the EU, it is unlikely that even minimal progress will be achieved.

In *Albania*, progress has been made in amending audiovisual media legislation to align with the 2018 EU directive on audiovisual media services, with the aim of qualifying for the Creative Europe Programme. Simultaneously, defamation remains a criminal offense with severe penalties, directly affecting journalists by inducing self-censorship due to the fear of financial repercussions. Regulatory bodies overseeing media and public media services

in the Western Balkan countries continue to be subjects of interest for politicians and political parties. Particularly, political parties seek to informally influence the selection of candidates promoting their political agenda within regulatory bodies and public services. In *Albania*, the appointment of Alfred Peza, formerly the Secretary for Media Relations and Civil Society of the ruling Socialist Party until September 2021, as the Director-General of the public broadcaster raises concerns about its future independence.<sup>27</sup>

In *Kosovo*, the board of public broadcaster Radio and Television Kosovo (RTK) faced criticism for approving the election of Rilind Gervalla as the new Director of the Albanian-language channels due to ties with the ruling party, Vetëvendosje.<sup>28</sup> Additionally, the Independent Media Commission (IMC) experienced significant dysfunction primarily due to a quorum shortage, rendering its board non-operational since March 2021. Although Kosovo's legal framework guarantees freedom of the media and expression, the independence of regulatory bodies for media and public broadcasters is crucial to ensure unbiased oversight, fostering a democratic media landscape that provides diverse, objective information to the public.

In *North Macedonia*, the reform of the public service broadcaster faced delays, with a decrease in government funding for Makedonska radio televizija (MRT) in 2022. This financial reduction corresponded with a worrying lack of action in parliament, where the appointment of new members to critical bodies like the Public Service Broadcaster's Programme Council and the Media Regulator's Council was continuously deferred. The reduced funding of MRT could compromise its quality and overall functioning. The failure to appoint new

22 Milica Stojanovic and Ivana Jeremic, "Serbian Parliament Adopts Controversial Media Laws," in: Balkan Insight, October 26, 2023, <https://balkaninsight.com/2023/10/26/serbian-parliament-adopts-controversial-media-laws/> (accessed November 11, 2023).

23 European Commission, Serbia 2023 Report. 2023 Communication on EU Enlargement Policy, Commission Staff Working Document SWD(2023) 695 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_695\\_Serbia.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_695_Serbia.pdf) (accessed November 11, 2023).

24 Freedom House, Serbia, <https://freedomhouse.org/country/serbia/freedom-net/2023> (accessed November 11, 2023).

25 Saša Dragojlo, "Acquittals in Trial for Serbian Editor's Murder Spark Protest in Belgrade" in: Balkan Insight, February 5, 2024, <https://balkaninsight.com/2024/02/05/acquittals-in-trial-for-serbian-editors-murder-spark-protest-in-belgrade/> (accessed February 5, 2024).

26 Reporters Without Borders, Serbia, <https://rsf.org/en/country/serbia> (accessed November 11, 2023).

27 Gjergj Erebara, "Ex-MP of Ruling Party to Lead Albania's Public Broadcaster," in: Balkan Insight, June 13, 2023, <https://balkaninsight.com/2023/06/13/former-sp-mp-elected-general-director-of-albanias-public-broadcaster/> (accessed November 12, 2023).

28 Perparim Isufi, "Kosovo Ruling Party Accused of 'Capturing' Public Broadcaster," in: Balkan Insight, February 1, 2023, <https://balkaninsight.com/2023/02/01/kosovo-ruling-party-accused-of-capturing-public-broadcaster/> (accessed November 12, 2023).

members to regulatory councils poses a threat to the independence and accountability of regulatory mechanisms and public broadcasting in North Macedonia. On a positive note, the Agency for Audio and Audiovisual Media Services actively collaborated with civil society organizations and media entities to promote media literacy initiatives addressing human rights issues.

On the other side, in *Bosnia and Herzegovina*, the mandate of the Communications Regulatory Agency (CRA) board expired at the end of 2017, and the parliament did not appoint a new board for the whole 2018-2022 term. The absence of effective regulatory oversight may result in the non-enforcement of broadcasting standards, potentially leading to a less accountable media environment. Public broadcasters have not yet managed to position themselves as independent media actors. This is followed by enormous financial problems and debts. Radio Television Bosnia and Herzegovina (BHRT) is on the verge of closure,<sup>29</sup> and two entity public broadcasters have been also accumulating huge debts.

Concerning *Serbia*, public consultations on two draft laws related to public information, media, and electronic media began in September 2023. With involvement from the public, media associations, and the European Commission, amendments were swiftly incorporated into legislation in October 2023,<sup>30</sup> just before the dissolution of parliament. These revisions aimed to strengthen the autonomy of the regulatory body for electronic media (REM) and simplify the nomination process for REM council members by minimizing political influences. On the other hand, expressions of hate speech and the use of discriminatory language in the media

are frequently met with little or no action from regulatory bodies or legal authorities. Serbia also faces pressure from the European Commission<sup>31</sup> to counter anti-EU narratives spread by numerous media outlets and to address foreign information manipulation, notably evident in Russia's aggression against Ukraine. Despite REM rejecting Sputnik's application for radio licenses in December 2022, Russia Today's (RT) English-language international channel continues to be broadcast in Serbia through cable TV. Moreover, in November 2022, RT launched a local RT Balkan multimedia web platform in Serbian, featuring government representatives in video content and promoting military recruitment for the prohibited Wagner paramilitary group without legal consequences.<sup>32</sup>

At the end of 2021, the parliament of *Montenegro*, based on the initiative of several non-governmental organizations (NGOs), unanimously adopted amendments to the Criminal Code<sup>33</sup> which enhance the safety and protection of journalists. The amendments were adopted with the support of all 70 present members of both the ruling and opposition parties. The working group responsible for the media legislation proposed laws related to media, audiovisual media services, and the national public broadcaster, RTCG, through consultations with media and civil society. Despite the conclusion of public debate in December 2022, the government has not adopted these laws, consistently delaying their approval in parliament. The laws were finalized only a few days before the formation of the new 44th government of Montenegro, led by Milojko Spajić.<sup>34</sup> The only advancement in this domain was the adoption of the Media Strategy for the period 2023 to 2027. The ownership of four out of five TV stations (Vijesti, Nova, Prva, Adria) with national frequen-

29 BHRT, "Završen protest radnika BHRT-a: Gašenje Javnog servisa ne smije biti opcija," in: BHRT, March 28, 2023, <https://bhrt.ba/u/%C5%BEivo-12h-protestuju-radnici-bhrt-a>, (accessed November 12, 2023).

30 Radio Slobodna Evropa, "Vlada Srbije usvojila predloge dva zakona o medijima," in: Radio Slobodna Evropa, October 20, 2023, <https://www.slobodnaevropa.org/a/srbija-vlada-mediji-zakoni/32646813.html>, (accessed November 12, 2023).

31 European Commission, Serbia 2023 Report. 2023 Communication on EU Enlargement Policy, Commission Staff Working Document SWD(2023) 695 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_695\\_Serbia.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_695_Serbia.pdf), (accessed November 11, 2023).

32 European Commission, Serbia 2023 Report. 2023 Communication on EU Enlargement Policy, Commission Staff Working Document SWD(2023) 695 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_695\\_Serbia.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_695_Serbia.pdf) (accessed February 5, 2024).

33 Human Rights Action, Akcija za ljudska prava, Skupština Crne Gore jednoglasno usvojila izmjene KZ-a u cilju jače krivičnopravne zaštite novinara, <https://www.hraction.org/2021/12/29/skupstina-crne-gore-jednoglasno-usvojila-izmjene-kz-a-u-cilju-jace-krivicnopravne-zastite-novinar/> (accessed November 12, 2023).

34 Vlada Crne Gore, Vlaović: Nova vlast da nastavi dobru praksu i obezbijedi usvajanje seta medijskih zakona, <https://www.gov.me/clanak/vlaovic-nova-vlast-da-nastavi-dobru-praksu-i-obezbjedi-usvajanje-seta-medijskih-zakona> (accessed November 12, 2023).

cies in Montenegro by companies from Serbia emphasizes the significance of public broadcasters in Montenegro. Therefore, measures are expected to be taken to enhance both the programming and financial independence of RTCG, considering that RTCG has been marked by controversies surrounding the appointment of its Director-General.<sup>35</sup>

### Insufficient Regional Synergy

Western Balkan countries share a complex history, and their paths toward media freedom have been influenced by similar political, and socioeconomic factors. For this reason, shared experiences can foster collaborative efforts. This collaboration often involves cooperation among local nongovernmental organizations and media rather than systematic collaboration between states and governments. The European integration process and EU standards offer the opportunity to exchange experiences. This collaboration facilitates a smoother integration process, ensuring that media landscapes in these countries meet the criteria set by the European Union.

Cross-border media cooperation exists, especially among states with similar languages and cultural backgrounds. Public broadcasters have established solid cooperation, some of them have signed mutual memoranda of cooperation,<sup>36</sup> and are part of the wider European Broadcasting Union (EBU)<sup>37</sup> network. A similar situation exists with regulatory bodies that are part of broader European networks of regulators, such as the European Regulators Group for Audiovisual Media Services (ERGA).<sup>38</sup> The exchange of media content and information-sharing in this domain is becoming more com-

mon, but there is still a need to encourage regional cooperation in investigative journalism.

Threats, attacks, and impunity for crimes against journalists persist in the region. A shared commitment to ensuring the safety of journalists, including legal protections and law enforcement efforts, is crucial for effective regional cooperation. Safe Journalists, a regional advocacy platform for media freedom and journalists' safety in the Western Balkans<sup>39</sup> plays a particularly important role in this regard, focusing on the safety of journalists, promoting solidarity, and providing support in cases of threats or attacks against media professionals.

The digital transformation has changed the habits of average media consumers, making digital platforms a key way for citizens to access information. The spread of disinformation, online harassment, and portals avoiding legal procedures impact public discourse – and this is a characteristic shared by all Western Balkan countries. Regional cooperation in developing strategies to address disinformation is vital. Platforms dedicated to debunking disinformation, such as Vistinomer<sup>40</sup> (North Macedonia), Istinomjer<sup>41</sup> and Raskrinkavanje<sup>42</sup> (Bosnia and Herzegovina), Raskrinkavanje<sup>43</sup> (Montenegro), Faktroje.al<sup>44</sup> (Albania), Sbunker.net<sup>45</sup> (Kosovo), Istinomer<sup>46</sup> (Serbia), are especially important and have established good lines of cooperation.

Perhaps one of the most valuable aspects of regional cooperation is related to professional development and capacity-building programs. Training programs, workshops, and knowledge-sharing opportunities enhance the skills of journalists and media profes-

35 European Commission, Montenegro 2023 Report. 2023 Communication on EU Enlargement Policy, Commission Staff Working Document SWD(2023) 694 final, November 8, 2023 [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_694%20Montenegro%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_694%20Montenegro%20report.pdf) (accessed November 11, 2023).

36 Radio televizija Crne Gore, "Potpisan memorandum o saradnji RTCG sa javnim emiterima Albanije i Kosova," in: Radio televizija Crne Gore, November 10, 2023 <https://rtcg.me/vijesti/drustvo/486163/potpisan-memorandum-o-saradnji-rtcg-sa-javnim-emiterima-albanije-i-kosova.html>, (accessed November 12, 2023).

37 European Broadcasting Union, Home, <https://www.ebu.ch/home> (accessed November 12, 2023).

38 ERGA, European Regulators Group for Audiovisual Media Services, <https://erga-online.eu/> (accessed November 12, 2023).

39 Safe Journalists, Homepage, <https://safejournalists.net/> (accessed November 12, 2023).

40 Vistinomer, Homepage, <https://vistinomer.mk/> (accessed November 12, 2023).

41 Istinomjer, Homepage, <https://istinomjer.ba/> (accessed November 12, 2023).

42 Raskrinkavanje Bosnia and Herzegovina, Homepage, <https://raskrinkavanje.ba/> (accessed November 12, 2023).

43 Raskrinkavanje Montenegro, Homepage, <https://www.raskrinkavanje.me/> (accessed November 12, 2023).

44 Faktroje, Homepage, <https://faktroje.al/> (accessed November 12, 2023).

45 Sbunker, Homepage, <https://sbunker.net/> (accessed November 12, 2023).

46 Istinomer, Homepage <https://www.istinomer.rs/> (accessed November 12, 2023).

sionals, fostering a more competent and resilient media community. Collaboration in media literacy is also noteworthy, with the majority of these programs and projects funded by the European Union.

It is important to mention SEENPM – South East European Network for Professionalization of Media<sup>47</sup> which promotes excellence in journalism through policy initiatives, research, and training in South East European countries, aiming to support the development of independent media and strengthen relations among journalists.

For Western Balkan countries the road ahead requires continued commitment from governments, not only media outlets and civil society organizations, to uphold the principles of media freedom and contribute to the overall democratization of the region.

### EU Support is Pivotal

The EU plays a crucial role in supporting media freedom in Western Balkan countries, recognizing its significance as a fundamental democratic value and a key condition for accession to the EU. The European Commission has developed long-term strategic guidelines for EU assistance to media freedom in the region, known as the guidelines for EU support to media freedom and media integrity in enlargement countries.

Financial assistance is the primary mechanism through which the EU supports media freedom in the Western Balkans. These funds aim to strengthen institutional capacities, enhance the professionalism of media outlets, and facilitate the adoption of EU standards. The European Commission provided substantial support to the media sector in the Western Balkans, totaling nearly 38 million EUR. This assistance is channeled through regional and bilateral programs. According to the latest data<sup>48</sup>, 31.6 million EUR have been allocated in recent

years to regional projects, including initiatives such as “Support to Media Freedom and Pluralism in the Western Balkans,” “Building Trust in Media,” “JUFREX 2 – Reinforcing Judicial Expertise on Freedom of Expression and the Media,” and the “Regional Training Programme to improve Quality and Professionalism in Journalism.” Additionally, the EU has periodically supported regional media networks and journalist associations, as well as their projects. Total bilateral assistance to the region and various projects amounts to 6.2 million EUR, with Albania receiving 376,500 EUR, Bosnia and Herzegovina 467,500 EUR, Kosovo 1.5 million EUR, Montenegro 130,000 EUR, Serbia 3.42 million EUR, and North Macedonia 400,000 EUR.<sup>49</sup> The focus of these projects includes support to legislative reforms, strengthening media professionalism, ensuring independent public broadcasters in all Western Balkan countries, enhancing independent journalism with a focus on investigative journalism, capacity-building programs, journalist safety, combating impunity for crimes against journalists, fighting disinformation (especially in light of Russia’s aggression against Ukraine), strengthening regulatory and self-regulatory mechanisms, enhancing regional cooperation, and supporting civil society organizations in advocacy efforts.

Perhaps the most important assistance lies in aligning the media legislation of Western Balkan countries with EU acquis and EU standards, notably through Chapter 10 (Information Society and Media) and Chapter 23 (Judiciary and Fundamental Rights). This collaboration is of great importance, considering the direct benefit to citizens who gain access to unbiased information crucial for upholding democratic principles, contributing to informed public discourse, and supporting democratic governance.

Despite the EU’s commitment to promote media freedom, the practical enforcement of these principles has exhibited inconsistency among certain member states, including Hungary which is con-

47 SEENPM – South East European Network for Professionalization of Media, Homepage, <https://seenpm.org/> (accessed November 12, 2023).

48 European Commission, EU Support to the Media Sector in the Western Balkans. Factsheet, November 7, 2022, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-11/EU%20support%20to%20the%20media%20sector%20in%20the%20western%20balkans\\_factsheet.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-11/EU%20support%20to%20the%20media%20sector%20in%20the%20western%20balkans_factsheet.pdf) (accessed February 5, 2024).

49 European Commission, EU Support to the Media Sector in the Western Balkans. Factsheet, November 7, 2022, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-11/EU%20support%20to%20the%20media%20sector%20in%20the%20western%20balkans\\_factsheet.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-11/EU%20support%20to%20the%20media%20sector%20in%20the%20western%20balkans_factsheet.pdf) (accessed November 12, 2023).



firmed in the latest Reporters Without Borders World Press Freedom Index<sup>50</sup>. Unfortunately, this creates an impression that the EU sets standards for the Western Balkan countries which it does not meet itself. Additionally, the EU's conditionality in the accession process has not consistently delivered real tangible improvements in media freedom. While the EU sets benchmarks for candidate countries, the monitoring and enforcement mechanisms have proven insufficient, allowing governments in the region to backtrack on media reforms once they achieve certain EU-related goals.

## Conclusion and Recommendations

The challenges faced by Western Balkan countries in ensuring full media freedom and democratization are multidimensional. These include the safety of journalists, quality of judicial sentences in attacks on journalists, weaknesses of regulatory and self-regulatory frameworks, insufficient independence, and political influence on public broadcasters. Economic vulnerabilities of the media and the bad socioeconomic standing of journalists provide an opportunity for external actors, particularly in Serbia and the Bosnia and Herzegovina entity Republic of Srpska, to spread disinformation campaigns. Despite legislative progress, the stagnation slows down the Western Balkan countries from aligning their media laws with EU standards. Regional cooperation must grow, and EU support is essential to maintaining the region's focus on European integration.

To address these uncertainties WB governments and state institutions working in the field of media should:

- Promptly adopt the recommendations of the European Commission. Long-standing limited (or no) progress in the field of freedom of expression demands urgent actions in the public and not political interest. The legislative alignment process must be inclusive and transparent. Harmonizing policies with the EU also involves the prohibition of Russian propaganda channels.
- Provide full information on media ownership, funding sources, and limit inappropriate media ownership concentration. Additionally, legisla-

tive amendments are necessary to ensure transparent and fair allocation of public budget funds to media that respect journalistic ethical codes. This is especially relevant to government, state-owned companies, and public enterprises advertising in the media.

- Ensure journalist safety followed by legal procedure amendments and prompt responses from relevant institutions such as police and prosecution offices for effective investigations into previous and recent attacks. There must be zero tolerance for the stigmatizing of journalists by public officials, and this should receive clear condemnation from both domestic and international organizations and institutions. Governments and public officials (not only civil society and media) must create and promote campaigns highlighting the importance of journalist safety for democracy.
- Financially support digital and media literacy programs which are crucial for educating citizens on media, enhancing critical thinking, and building resilience against disinformation coming from guerrilla portals whose founders are unknown and which are not registered in accordance with the law. This involves government-led initiatives and support for existing civil society and media initiatives, with a focus on youth.
- Promote cyber-secure media in the Western Balkans, which is imperative for enhancing resilience, upholding freedom of expression, and cultivating a trustworthy information system. By adopting best cybersecurity practices, all countries in the region can effectively counter potential threats to media organizations, thereby safeguarding against the dissemination of disinformation, ensuring the confidentiality of journalistic sources, and finally preserving the public's right to access accurate and impartial information.
- Ensure the independence of public broadcasters and media regulatory bodies from political influences. Experienced individuals with impeccable nonpolitical backgrounds must lead these institutions. Strengthening their independence is pivotal for democratization in Western Balkan countries.

50 Reporters Without Borders, Hungary, <https://rsf.org/en/country/hungary> (accessed December 22, 2023).



Governments, media, and civil society organizations should:

- Establish oversight consultative bodies (such as media councils), comprised of representatives of government, media, media unions, media regulatory bodies, and civil society would be a useful solution. These advisory bodies should autonomously reach conclusions, regardless of political and ideological differences, providing continuous monitoring of the media scene in each country.

Media and civil society organizations should:

- Strengthen collaboration and relationship between traditional media and social media platforms. Sharing professional and ethical content on these channels can boost information dissemination, widen audience reach, and enhance public engagement, fostering transparency and democratic values. Despite the rising popularity of social media and other challenges, the importance of traditional media remains crucial.

The EU and the international community should:

- Continue its commitment to media freedom in the Western Balkans by providing financial support to independent journalism, capacity-building programs, and, more importantly, technical assistance for harmonizing media legislation between the EU and Western Balkan countries.
- Address the erosion of media freedoms in member states like Hungary and demonstrate its ability to enforce stricter procedures, applying adequate sanctions to those disregarding the fundamental pillars of the rule of law. EU institutions, particularly the European Parliament and European Commission, should initiate targeted political actions and increase pressure on these countries to prevent a spillover effect on other member states. The above-mentioned measures would send a clear message to Western Balkan countries that the EU will not tolerate compromises on media freedom and will actively sanction such violations.

# With a Little Help from our Friends – Joining Efforts to Fight Disinformation

**Darko Brkan and Marija Ćosić**  
Citizens' Association "Why Not"

Bosnia and Herzegovina, Montenegro, Serbia, Kosovo, Albania, and North Macedonia (Western Balkans, WB6) all face various serious challenges posed by disinformation. All WB6 are experiencing significant foreign influence, coming from different countries and causing information disorders. Social media and other large online media platforms lack accountability and do not have appropriate mechanisms to counter disinformation in the region. Since none of the WB6 countries are a member of the European Union (EU), regulations regarding various aspects of disinformation proposed and adopted in the EU are not being applied in the WB6 region. Adopting EU digital legislation in national laws of the WB6 countries would be valuable for both the EU and the WB6, but not sufficient. However, the WB6 governments adopting the legislation is not enough. In addition, the EU needs to expand the reach of its legislation, for example by covering the activities of very large online platforms (VLOPs) and very large online search engines (VLOSEs) in the WB6. A systemic approach to the improvement of media credibility and sustainability, as well as cooperation between the media and fact-checking organizations and networks are also key to tackling information disorders in the WB6.

## Setting the Stage

Disinformation, misinformation, and other types of information disorders have become a common reality in all of the Western Balkan countries. While there are several similarities in the disinformation disorders of individual countries, there are also a lot of country-specific differences.

“Disinformation is an endemic and ubiquitous part of politics throughout the Western Balkans, without exception,” according to a study published in

2021 by the Policy Department for External Relations, at the request of the European Parliament’s Committee on Foreign Affairs, “Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them.”<sup>1</sup> The prevalence of this, as well as other information disorders, is also confirmed by various studies conducted by a number of organizations dealing with these issues in the Western Balkans.<sup>2</sup>

Disinformation in the region comes from various sources. Foreign actors often appear as sources of

1 Samuel Greene, Gregory Asmolov, Adam Fagan, Ofer Fridman, and Borjan Gjuzelov, Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them, Directorate General for External Policies of the Union, February 2021, [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO\\_STU\(2020\)653621\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO_STU(2020)653621_EN.pdf) (accessed November 17, 2023).

2 Tijana Cvjetičanin, Darko Brkan, Emir Zulejhić, Biljana Livančić-Milić, Disinformation in the Online Sphere. The Case of BiH, UG Zašto ne, April 2019, [https://zastone.ba/app/uploads/2019/05/Disinformation\\_in\\_the\\_online\\_sphere\\_The\\_case\\_of\\_BiH\\_ENG.pdf](https://zastone.ba/app/uploads/2019/05/Disinformation_in_the_online_sphere_The_case_of_BiH_ENG.pdf) (accessed November 17, 2023).

Despina Kovachevska, Nikola Petrovic, Ismar Milak, Barbara Halla, Aimona Vogli, Fitim Gashi, Marko Vukajlović, and Darvin Murić, Disinformation Trends and Narratives in the Western Balkans. Media Monitoring Report for the Period July-December 2022, Metamorphosis Foundation for Internet and Society, July 2023, [https://metamorphosis.org.mk/wp-content/uploads/2023/03/disinformation\\_trends\\_and\\_narratives\\_in\\_the\\_western\\_balkans\\_media\\_monitoring\\_report\\_jul-dec-2022-1.pdf](https://metamorphosis.org.mk/wp-content/uploads/2023/03/disinformation_trends_and_narratives_in_the_western_balkans_media_monitoring_report_jul-dec-2022-1.pdf) (accessed November 17, 2023).

disinformation in the region, but a large amount of it is also produced by local sources.<sup>3</sup> Russian influence has been particularly strong in the region, escalating with the beginning of the full-scale invasion of Ukraine in 2022. According to research conducted by the fact-checking platform Raskrinkavanje from Bosnia and Herzegovina (BiH), between January 2022 and October 2022, the most prominent disinformation narratives focused on the invasion of Ukraine. They echoed common Russian propaganda, stemming from President Vladimir Putin's speech on the eve of the invasion.<sup>4</sup>

There are several specificities in different Western Balkan countries regarding disinformation and their sources.

In *Bosnia and Herzegovina*, for instance, a large part of the problem is the fact that the public broadcaster from Republika Srpska, Radio Television of Republika Srpska (RTRS),<sup>5</sup> as well as the news agency Srna,<sup>6</sup> are a common source of disinformation and propaganda narratives. Claims published by these media outlets are usually spread by different media close to the government of Republika Srpska, thus reaching wide audiences. Another issue in BiH is the surge of anonymous media outlets spreading disinformation.<sup>7</sup> When it comes to the sources of disinformation, BiH has a complex media landscape, with various specificities related to different administrative parts of the country. In Republika Srpska, for example, most of the disinfor-

mation is predominantly international in nature, concluded the Policy Department for External Relations in a 2021 study.<sup>8</sup>

In *Serbia*, a significant issue is the state media capture and the work of tabloids.<sup>9</sup> A lot of foreign disinformation comes from two Russian media outlets with branches operating in this country: Russia Today Balkan and Sputnik Serbia.<sup>10</sup> Media outlets from Serbia are also a common source of disinformation for other countries in the region, especially Montenegro and Kosovo. Additionally, a significant amount of disinformation in Kosovo and Montenegro comes from international sources, but, as in most of the region, local actors are most efficient in spreading these narratives to the public.

When it comes to *Montenegro*, polarization in the media landscape regarding political issues plays a significant role in the state of disinformation. Similarly, polarization and the conflict in *Kosovo* have much influence on the work of the media in the country. Political misinformation is dominant, and online media and their social media channels are the main disseminators of disinformation in Kosovo.<sup>11</sup>

In *North Macedonia*, a combination of both domestic and international media are the key sources of disinformation. Political polarization and foreign influence are also very significant in this country.

Foreign influence in *Albania* is also very present. Another significant issue when it comes to informa-

3 Samuel Greene, Gregory Asmolov, Adam Fagan, Ofer Fridman, Borjan Gjuzelov, Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them, Policy Department for External Relations Directorate General for External Policies of the Union, February 2021, [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO\\_STU\(2020\)653621\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO_STU(2020)653621_EN.pdf) (accessed November 17, 2023).

4 Tijana Cvjetičanin, Marija Ćosić, Darko Brkan, Emir Zulejhić, Nerma Šehović, Elma Murić, Alena Beširević, Rašid Krupalija, Mladen Lakić, and Marija Manojlović, Disinformation Narratives in BiH and the Region, UG Zašto ne, March 2023, [https://zastone.ba/app/uploads/2023/03/Disinformation\\_narratives\\_in\\_BiH\\_and\\_the\\_region.pdf](https://zastone.ba/app/uploads/2023/03/Disinformation_narratives_in_BiH_and_the_region.pdf) (accessed November 17, 2023).

5 RTRS' articles were rated more than 140 times by a fact-checking platform Raskrinkavanje. Raskrinkavanje's analyses are available at: <https://raskrinkavanje.ba/medij/rtrs> (accessed November 17, 2023).

6 Srna's articles were rated more than 60 times by the fact-checking platform Raskrinkavanje. Raskrinkavanje's analyses are available at: <https://raskrinkavanje.ba/medij/srna> (accessed November 17, 2023).

7 Tijana Cvjetičanin, Darko Brkan, Emir Zulejhić, Biljana Livančić-Milić, Disinformation in the Online Sphere. The Case of BiH, UG Zašto ne, April 2019, [https://zastone.ba/app/uploads/2019/05/Disinformation\\_in\\_the\\_online\\_sphere\\_The\\_case\\_of\\_BiH\\_ENG.pdf](https://zastone.ba/app/uploads/2019/05/Disinformation_in_the_online_sphere_The_case_of_BiH_ENG.pdf) (accessed November 17, 2023).

8 Samuel Greene, et al., 2021.

9 Marija Vučić and Milica Ljubičić, "Last Year, Almost 1,200 Manipulations and Disinformation were on the Front Pages of Five Newspapers," in: Raskrikavanje, April 10, 2023, <https://www.raskrikavanje.rs/page.php?id=Last-year-almost-1200-manipulations-and-disinformation-were-on-the-front-pages-of-five-newspapers-1169> (accessed November 18, 2023).

10 Thomas Brey, Russische Medien auf dem Balkan, Friedrich Naumann Foundation for Freedom, February 2022, <https://www.freiheit.org/de/deutschland/russische-medien-auf-dem-balkan> (accessed November 18, 2023).

11 Plator Avdiu and Shkelzen Osmani, Behind the Screens. Annual Report on the State of Information Disorder, ADS/hibrid.info, July 2023, <https://hibrid.info/behind-the-screens-annual-report-on-the-state-of-information-disorder/> (accessed November 18, 2023).

tion disorders in this country is the proliferation of disinformation by local political actors.

Given the fact that part of the region shares common languages and that the entire region shares various aspects of a certain political context, media outlets from countries in the region influence each other's landscape significantly. Therefore, a lot of the specificities mentioned above are often intertwined, and there is a spillover effect from one country into the others. Researchers have been warning that disinformation in the region needs to be considered as a hybrid threat.<sup>12</sup>

Notably, a lot of misinformation and disinformation globally is spread through various social media platforms.<sup>13</sup> Large social media platforms, such as Facebook, Instagram, TikTok, or Telegram currently have no obligation to enforce any action regarding the regulation of disinformation in the region. If things remain as they are, these platforms will be able to continue avoiding such obligations in the future, since none of the WB6 countries are members of the European Union (EU). Currently, the only large social media platform that has a transparent fact-checking program that includes organizations from all WB6 is Meta.<sup>14</sup> TikTok has a program dedicated to combating misinformation, but the program does not include

any organizations from this region.<sup>15</sup> Telegram, on the other hand, has no public commitments to counter disinformation on the platform. It is, therefore, a popular platform to spread such content.<sup>16</sup> In the region, Russian and pro-Russian Telegram channels, have been used heavily to spread disinformation.<sup>17</sup> These channels are not only focused on spreading disinformation about Russia's invasion of Ukraine but also play a role in local disinformation campaigns, such as ones regarding the situation in Kosovo.

Large online platforms lack accountability, as well as concrete mechanisms to counter disinformation in the Western Balkans. Research conducted by ProPublica found that over 60 percent of all articles from WB countries that were rated as disinformation by the fact-checking platform Raskrinkavanje were still monetized by Google. This is the largest percentage in Europe.<sup>18</sup>

Fact-checking initiatives in the WB region have a long history and strong presence. Every country has at least one such initiative that is a verified signatory of International Fact-Checking Network:<sup>19</sup> Istinomjer and Raskrinkavanje in BiH,<sup>20</sup> Raskrinkavanje in Montenegro,<sup>21</sup> Fake News Tragač,<sup>22</sup> Raskrikavanje,<sup>23</sup> Istinomer,<sup>24</sup> and AFP Provera Činjenica<sup>25</sup> in Serbia, Kryptometer<sup>26</sup> and Hibrid.info<sup>27</sup> in Koso-

12 Darko Brkan, "Open-Source Analysis: Foreign Instigators and Local Amplifiers. Disinformation in Bosnia", in: Medium, March 13, 2020, <https://medium.com/dfrlab/open-source-analysis-foreign-instigators-and-local-amplifiers-disinformation-in-bosnia-5125049cff28> (accessed November 18, 2023).

13 Sadiq Muhammed and Saji K. Mathew, "The Disaster of Misinformation. A Review of Research in Social Media," in: International Journal of Data Science and Analytics, 13(4), 271–285, February 15, 2022, <https://doi.org/10.1007/s41060-022-00311-6> (accessed November 17, 2023).

14 Facebook, Meta For Media. Where We Have Fact Checking, <https://www.facebook.com/formedia/mjp/programs/third-party-fact-checking/partner-map> (accessed November 17, 2023).

15 TikTok, Combatting Misinformation, <https://www.tiktok.com/transparency/en-us/combating-misinformation/> (accessed November 17, 2023).

16 Francesco Poldi, Alexandre Alaphilippe, Rita Jonusaite, Maria Giovanna Sessa, Disinformation on Telegram. Research And Content Moderation Policies, EU DisinfoLab, December 2022, [https://www.disinfo.eu/wp-content/uploads/2022/12/20221220\\_TD\\_Telegram.pdf](https://www.disinfo.eu/wp-content/uploads/2022/12/20221220_TD_Telegram.pdf) (accessed November 17, 2023).

17 Maja Živanović and Dušan Komarčević, "Kako su proruski i ruski Telegram kanali širili dezinformacije o Kosovu", in: Radio Slobodna Evropa, August 1, 2022, <https://www.slobodnaevropa.org/a/kosovo-rusija-telegram-proruski-drustvene-mreze-dezinformacije/31969041.html> (accessed November 18, 2023).

18 Craig Silverman, Ruth Talbot, Jeff Kao, and Anna Klühspies, "How Google's Ad Business Funds Disinformation Around the World," in: ProPublica, October 2022, <https://www.propublica.org/article/google-alphabet-ads-fund-disinformation-covid-elections> (accessed November 20, 2023).

19 IFCN, Verified Signatories of the IFCN Code of Principles, <https://ifcncodeofprinciples.poynter.org/signatories> (accessed November 20, 2023).

20 Zašto ne, O nama, <https://zastone.ba/o-nama/> (accessed November 20, 2023).

21 Raskrinkavanje, O nama, <https://www.raskrinkavanje.me/o-nama/> (accessed November 20, 2023).

22 Fake News Tragač, O nama, <https://fakenews.rs/o-nama/> (accessed November 20, 2023).

23 Raskrikavanje, O nama, [https://www.raskrikavanje.rs/o\\_nama.html](https://www.raskrikavanje.rs/o_nama.html) (accessed November 20, 2023).

24 Istinomer, O Istinomeru. Sta je Istinomer?, <https://www.istinomer.rs/o-istinomer/> (accessed November 20, 2023).

25 AFP Provera Činjenica, O AFP-u, <https://cinjenice.afp.com/o-afp-u> (accessed November 20, 2023).

26 Kallxo, Kryptometer, <https://kallxo.com/krypometer/> (accessed November 20, 2023).

27 Hibrid.info, Rreth hibrid.info, <https://hibrid.info/rreth-hibrid-info/> (accessed November 20, 2023).

vo, Faktoje<sup>28</sup> in Albania, and Vistinomer<sup>29</sup> in North Macedonia.

Significant presence and impact of disinformation in the region is also demonstrated by the rise in public concern regarding disinformation. According to the Public Opinion Survey on Security<sup>30</sup> conducted by the Regional Cooperation Council (RCC) between May 14, 2023, and June 2, 2023, across Western Balkans countries, 79 percent of the respondents from WB6 countries perceive the spread of fake news as a threat. The exception was Kosovo, where around 50 percent of the respondents suggested that disinformation was not a threat.

The easy, persistent and common spread of disinformation in the WB6 region is a reflection of the region's low media literacy as well as the fact that various financial, political, and other interests are achievable by disseminating disinformation. All of the WB6 countries scored very low on the Media Literacy Index in 2023.<sup>31</sup> Among 41 countries in the index, Kosovo is on the 40th, North Macedonia on 39th, Albania on 38th, and Bosnia and Herzegovina on the 37th place. That means that in the 5 lowest scoring countries in the Media Literacy Index, 4 are from the WB6 region. All of the countries, except for Bosnia and Herzegovina and Serbia registered a drop in the score, compared to the Index created in 2022.<sup>32</sup> Insufficient legislation, as well as lack of media accountability, along with no accountability of online platforms in the region all play a significant role. Dissemination of disinformation allows certain actors to obtain financial gain as well as political and other influence in the WB6

region. The current legislative framework is not equipped with mechanisms to prevent that.

## Legislative and Policy Framework for Fighting Disinformation in the WB6

When it comes to policy responses in the Western Balkans related to disinformation, there is no unified approach in the region.

### Montenegro

In Montenegro, current legislation does not reference disinformation as such. The Electronic Media Law in this country, which regulates the work of audiovisual media (radio and television) and the work of the Agency for Electronic Media, as well as other questions related to audiovisual media outlets, does not explicitly mention disinformation.<sup>33</sup> However, certain points in article 146 do address issues that can be interpreted as examples of information disorder (see subsections 34, 35, 36, 40, 46).

A self-regulatory framework for media is also not comprehensive in Montenegro. The journalists' code<sup>34</sup> in this country is outdated, experts warn,<sup>35</sup> and it does not mention disinformation as an issue. In 2023, the Ministry of Culture and Media in Montenegro came out with a media strategy for the years from 2023 until 2027.<sup>36</sup> The strategy looks into disinformation but does not foresee any actionable measures for the mitigation of this issue. A new media law was announced as well as a fund for media pluralism, but neither have been introduced yet.<sup>37</sup>

28 Faktoje, Kush jemi, <https://faktoje.al/kush-jemi/#> (accessed November 20, 2023).

29 Vistinomer, Za Vistinomer, <https://vistinomer.mk/za-vistinomer/> (accessed November 20, 2023).

30 Zhidas Daskalovski, Ilda Zhulali, Mirjana Đorđević, Stefan Vladislavljev, and Mirela Arqimandriti, SecuriMeter2023. Public Opinion Survey on Security, Regional Cooperation Council, June 2023, <https://www.rcc.int/pubs/163/securimeter2023public-opinion-survey-on-security> (accessed November 20, 2023).

31 Marin Lessenski, Media Literacy Index 2023. Report, European Policies Initiative, June 2023, <https://osis.bg/wp-content/uploads/2023/06/MLI-report-in-English-22.06.pdf> (accessed January 2, 2024).

32 Marin Lessenski, How It Started, How It is Going: Media Literacy Index 2022, European Policies Initiative, October 2022, [https://osis.bg/wp-content/uploads/2022/10/HowItStarted\\_MediaLiteracyIndex2022\\_ENG\\_.pdf](https://osis.bg/wp-content/uploads/2022/10/HowItStarted_MediaLiteracyIndex2022_ENG_.pdf), (accessed January 2, 2024).

33 Paragraf, Zakon o elektronskim medijima, <https://www.paragraf.me/propisi-crnegore/zakon-o-medijima.html> (accessed November 20, 2023).

34 OSCE, Kodeks novinara/novinarki Crne Gore, <https://www.osce.org/files/f/documents/2/f/255576.pdf> (accessed November 20, 2023).

35 Vijesti Online, "Institut za medije: Kodeks novinara Crne Gore zastario, medijskoj sceni potrebna jača samoregulacija," in: Vijesti, October 9, 2023, <https://www.vijesti.me/vijesti/drustvo/677004/institut-za-medije-kodeks-novinara-crne-gore-zastario-medijskoj-sceni-potrebna-jaca-samo-regulacija> (accessed November 20, 2023).

36 Vlada Crne Gore, Predlog medijske strategije Crne Gore 2023-2027. sa Predlogom akcionog plana za period 2023-2024. godine, <https://www.gov.me/dokumenta/3d29965b-5536-41d7-875f-02316d5524ed>, (accessed November 20, 2023).

37 CDT, "Crna Gora se ne bori protiv dezinformacija jer političari žele da ih koriste", in: Centar za demokratsku tranziciju, December 6, 2022, <https://www.cdtmn.org/2022/12/06/crna-gora-se-ne-bori-protiv-dezinformacija-je-politricari-zele-da-ih-koriste/> (accessed November 20, 2023).



## North Macedonia

In North Macedonia, similarly to Montenegro, the Audio and Audio-Visual Media Services Act does not reference disinformation at all.<sup>38</sup> The media law regulates the work of print media, but this does not treat disinformation in any way.<sup>39</sup> Self-regulation of the media in North Macedonia has two levels: the Association of Journalists of Macedonia with the Council of Honor,<sup>40</sup> and Council of Media Ethics of Macedonia.<sup>41</sup> The former is a self-regulatory body that, among other things, processes complaints filed by citizens on the work of journalists that are members of the association. The latter is a nongovernmental organization that applies “moral sanctions” on those who do not uphold the journalists’ code.<sup>42</sup> In its very first article, the Code of Journalists in Macedonia article addresses disinformation by stating, among other things, that “the journalists shall publish correct, verified information,” as well as that “correctness of the information ought to be verified as much as possible.”<sup>43</sup>

The government of North Macedonia announced in 2019 a proposed plan for decisive action against the spread of disinformation and against attacks on democracy,<sup>44</sup> but it was never adopted.

## Serbia

Legislation in Serbia treats the question of disinformation to some extent. The Law on Public Information and Media,<sup>45</sup> as well as Electronic Media Law<sup>46</sup>

both proclaim that the people have the right to be correctly informed. The Law on Public Information and Media also states that editors and journalists are obliged to check the “origin, truthfulness and completeness” of information before publishing it. Article 343 of Serbia’s Criminal Code proclaims that whoever causes panic or disturbs public order or peace by spreading false news or assertions will be punished with a minimum of three months and up to three years of imprisonment as well as a fine.<sup>47</sup>

The Code of Journalists in Serbia is a document that describes professional and ethical journalistic standards<sup>48</sup> for self-regulation. This code also points out that it is journalists’ obligation to report “accurately, objectively, completely and timely.” The Press Council, an independent self-regulatory body, is responsible for monitoring compliance with the Code, as well as resolving complaints from individuals and institutions.<sup>49</sup>

## Bosnia and Herzegovina

The Communications Regulatory Agency (CRA) is responsible for the regulation of audiovisual media<sup>50</sup> in Bosnia and Herzegovina. This regulation is mostly based on complaints made by citizens, and the content is primarily regulated based on the Code on Audiovisual Media Services and Radio Services.<sup>51</sup> According to article 7, it is forbidden to publish content “for which it is known or can be established based on common sense or routine check

- 38 Agencija za audio i audiovizuelni medijski usluzi, Zakon za audio i audiovizuelni medijski usluzi, <https://avmu.mk/%D0%B7%D0%B0%D0%BA%D0%BE%D0%BD-%D0%B7%D0%B0-%D0%B0%D1%83%D0%B4%D0%B8%D0%BE-%D0%B8-%D0%B0%D1%83%D0%B4%D0%B8%D0%BE%D0%B2%D0%B8%D0%B7%D1%83%D0%B5%D0%BB%D0%BD%D0%B8-%D0%BC%D0%B5%D0%B4%D0%B8%D1%83%D0%BC/> (accessed November 17, 2023).
- 39 Agencija za audio i audiovizuelni medijski usluzi, Zakon za medijumi, <https://avmu.mk/%D0%B7%D0%B0%D0%BA%D0%BE%D0%BD-%D0%B7%D0%B0-%D0%BC%D0%B5%D0%B4%D0%B8%D1%83%D0%BC%D0%B8/> (accessed November 17, 2023).
- 40 Zdruzenie na novinarite na Makedonija, Sovet na cest, <https://znm.org.mk/sovet-na-chest/> (accessed November 17, 2023).
- 41 Council of Media Ethics of Macedonia, Homepage, <https://www.semm.mk/> (accessed November 17, 2023).
- 42 Council of Media Ethics of Macedonia, About CMEM, <https://semm.mk/en/sovet-za-etika-3/za-nas> (accessed November 17, 2023).
- 43 Council of Media Ethics of Macedonia, Code of Journalists of Macedonia, <https://semm.mk/en/documents/useful-resorces/kodeks> (accessed November 17, 2023).
- 44 Vlada na Republika Severna Makedonija, Predlog plan za odlučna akcija protiv širenje dezinformacii i protiv napadi vrz demokratijata, <https://vlada.mk/node/18640> (accessed November 17, 2023).
- 45 Paragraf, Zakon o javnom informisanju i medijima, [https://www.paragraf.rs/propisi/zakon\\_o\\_javnom\\_informisanju\\_i\\_medijima.html](https://www.paragraf.rs/propisi/zakon_o_javnom_informisanju_i_medijima.html) (accessed November 17, 2023).
- 46 Paragraf, Zakon o elektronskim medijima, [https://www.paragraf.rs/propisi/zakon\\_o\\_elektronskim\\_medijima.html](https://www.paragraf.rs/propisi/zakon_o_elektronskim_medijima.html) (accessed November 17, 2023).
- 47 Paragraf, Krivični zakonik, <https://www.paragraf.rs/propisi/krivicni-zakonik-2019.html> (accessed November 17, 2023).
- 48 Savet za štampu, Kodeks novinara Srbije, 2015, [https://savetzastampu.rs/wp-content/uploads/2020/11/Kodeks\\_novinarina\\_Srbije.pdf](https://savetzastampu.rs/wp-content/uploads/2020/11/Kodeks_novinarina_Srbije.pdf) (accessed November 17, 2023).
- 49 Savet za štampu, O nama, <https://savetzastampu.rs/o-nama/> (accessed November 17, 2023).
- 50 Regulatorna agencija za komunikacije Bosne i Hercegovine, <https://www.rak.ba/bs-Latn-BA/> (accessed November 17, 2023).
- 51 Vijeće Regulatorne agencije za komunikacije Bosne i Hercegovine, Kodeks o audiovizuelnim medijskim uslugama i medijskim uslugama radija, December 2015, [https://www.media.ba/sites/default/files/kodeks\\_o\\_audiovizuelnim\\_medijskim\\_uslugama\\_i\\_medijskim\\_uslugama\\_radija\\_rakbih.pdf](https://www.media.ba/sites/default/files/kodeks_o_audiovizuelnim_medijskim_uslugama_i_medijskim_uslugama_radija_rakbih.pdf) (accessed November 17, 2023).

that it is false or misleading, or for which there is a justified assumption that it is false or misleading.” Several different articles also relate to some extent to the issue of publishing disinformation.<sup>52</sup> Violations of the Code can be subject to different fines, defined in the Overview of Violations and Corresponding Sanctions Ruled by the CRA.<sup>53</sup> No specific country-wide law in BiH treats disinformation in any way. In various administrative parts of BiH, such as Republika Srpska and Kanton Sarajevo, efforts were made by lawmakers to have the internet be treated as a public space and subject to the same regulations regarding public order and peace.<sup>54</sup> Effectively, this would mean that publishing false information could be punishable by law. In August 2023, in Republika Srpska, slander became a criminal offense, after changes to the Criminal Code were adopted.<sup>55</sup>

Self-regulatory framework for the press and online media in Bosnia and Herzegovina is in jurisdiction of the Press Council.<sup>56</sup> The Council’s work is based on the Press and Online Media Code of BiH.<sup>57</sup> Article 7 of this Code proclaims that “journalists and editors must not publish inaccurate or misleading content,” and that they are “obliged to check all the facts.”

### Kosovo

The Independent Media Commission (IMC) is in charge of the “regulation, management and oversight of the broadcasting frequency spectrum in the Republic of Kosovo.”<sup>58</sup> Responsibilities and juris-

diction of the Commission were established through the Law on the Independent Media Commission, based on the Constitution of the Republic of Kosovo.<sup>59</sup> The law does not reference information disorders in any particular way. When it comes to self-regulation in Kosovo, the Press Council of Kosovo is the mechanism in charge of it.<sup>60</sup> One of the aims of the Council, according to its website, is to “protect the citizens from false information and journalists from baseless complaints.” The Press Council of Kosovo deals with complaints over alleged violations of the Press Code of Kosovo.<sup>61</sup> Article II.1. of the Code is titled “Fake News,” and it prescribes that print media ought to verify information before publishing it and not use any manipulated material. However, experts warn that both mechanisms are facing various challenges in their work.<sup>62</sup>

The Kosovo Security Strategy for the years 2022 to 2027 mentions disinformation as one of the threats to the country. The Strategy, however, does not propose any actions referring explicitly to disinformation.

### Albania

Much like many other WB6 countries, the Albanian regulatory framework does not reference disinformation in particular.<sup>63</sup> Article 267 of the Criminal Code, however, states that the spread of false information aimed at inciting “a state of insecurity or panic in people” is punishable by up to five years of incarceration and a fine.<sup>64</sup> Article 271 also prescribes punishment for the intentional provision of

52 Tijana Cvjetičanin, et al., 2019.

53 Regulatorna agencija za komunikacije, Pregled povreda i odgovarajućih kazni koje izriče Regulatorna agencija za komunikacije, February 7, 2017, <https://docs.rak.ba/articles/2086f18f-bb7a-4c34-970a-64f00819ff4c.pdf> (accessed November 17, 2023).

54 Emir Zulejhić and Dalio Sijah, “Nacrt zakona o prekršajima protiv javnog reda i mira u KS: Između javnog reda i mira i slobode govora,” in: Inicijativa za monitoring evropskih integracija BiH, August 7, 2023, <https://eu-monitoring.ba/nacrt-zakona-o-prekršajima-protiv-javnog-reda-i-mira-u-ks-izmedju-javnog-reda-i-mira-i-slobode-govora/> (accessed November 17, 2023).

55 Radio Slobodna Evropa, “Kleveta postala krivično djelo u Republici Srpskoj,” in: Radio Slobodna Evropa, August 26, 2023, <https://www.slobodnaevropa.org/a/bih-rs-kleveta-zakon/32565201.html> (accessed November 17, 2023).

56 Vijeće za štampu i online medije u Bosni i Hercegovini, Homepage, <https://vzs.ba/> (accessed November 17, 2023).

57 Vijeće za štampu i online medije u Bosni i Hercegovini, Kodeks za štampane i online medije BiH, <https://vzs.ba/kodeks-za-stampane-i-online-medije-bih/> (accessed November 17, 2023).

58 Independent Media Commission, About the IMC, <https://www.kpm-ks.org/en/kpm/311/per-kpm/311> (accessed November 17, 2023).

59 Independent Media Commission, Law on the Independent Media Commission, <https://www.kpm-ks.org/assets/cms/uploads/files/LAW%20No.%2004%20L-044%20ON%20THE%20INDEPENDENT%20MEDIA%20COMMISSION.pdf> (accessed November 17, 2023).

60 Press Council of Kosovo, About us, <http://presscouncil-ks.org/about-us/?lang=en> (accessed November 17, 2023).

61 Press Council of Kosovo, Press Code of Kosovo, <http://presscouncil-ks.org/about-us/document-list/?lang=en> (accessed November 17, 2023).

62 Plator Avdiu and Shkelzen Osmani, 2023.

63 Ilda Londo, National Regulatory and Self-Regulatory Framework Against Hate-Speech and Disinformation. Fact Sheet, November 2021, <https://seenpm.org/wp-content/uploads/2021/12/Resilience-Factsheet-Albania.pdf> (accessed November 17, 2023).

64 Criminal Code Of The Republic Of Albania, [https://track.unodc.org/uploads/documents/BRI-legal-resources/Albania/27\\_-Albania\\_Criminal\\_Code\\_1995\\_am2017\\_en.pdf](https://track.unodc.org/uploads/documents/BRI-legal-resources/Albania/27_-Albania_Criminal_Code_1995_am2017_en.pdf) (accessed November 17, 2023).

false information to emergency units. The Audiovisual Media Authority (AMA) regulates the work of audiovisual broadcasters in Albania.<sup>65</sup> The Law on Audio and Audio-Visual Media Services in the Republic of Albania<sup>66</sup> and the Code of Broadcast<sup>67</sup> on which, among other documents, AMA bases its work, do not treat disinformation specifically. The Code states that audiovisual activity should protect from disinformation and that published information should be true and accurate.

The self-regulatory framework in Albania is based on the Code of Ethics for Journalists,<sup>68</sup> enforced by the Albania Media Council.<sup>69</sup> This Code states that journalists “must verify information prior to its publication” and that media should not mislead the public.

In conclusion, various WB6 countries reference disinformation through their regulatory and self-regulatory framework to a different extent. Experts, the public, and other stakeholders have expressed concern that many of the proposed and adopted regulations, such as the ones in Serbia, Republika Srpska, and Kanton Sarajevo would infringe on the freedom of speech and democracy. Generally, issues of information disorders are more present in self-regulatory frameworks, meaning they are rarely part of the media’s legal responsibilities.

## Regional Cooperation Combatting Disinformation

The Western Balkans region has various instances of cooperation regarding disinformation. In 2020, six organizations created the SEE Check network, dedicated to increasing resilience to disinformation in the Southeast Europe (SEE) region, fact-checking, as well as advocating for “improvement of the media ecosystem and strengthening of journalism professional standards.”<sup>70</sup> Member organizations of SEE Check implement various projects together, produce articles and fact-checks, as well as different regional studies and papers.<sup>71</sup>

Another instance of cooperation is the Anti-Disinformation Network for the Balkans (ADN-Balkans).<sup>72</sup> The network’s goal is to create “a wide front on countering disinformation through affirmation of the highest standards of fact-checking and all other ethical principles of professional journalism, as well as promoting media literacy and critical thinking.” ADN-Balkans’ project Western Balkans Anti-Disinformation Hub (WBADH)<sup>73</sup> aims at exposing foreign influence in the region.

Southeast Europe Digital Rights Network, with signatories from all six Western Balkan countries, offers another platform for regional cooperation.<sup>74</sup> This network’s goal is to build capacities of signatory organizations to tackle digital threats as well as to “protect digital rights and address the growing challenges posed by the widespread use of advanced technologies in the Balkan region.”

65 Audiovisual Media Authority, <https://ama.gov.al/?lang=en> (accessed November 17, 2023).

66 Audiovisual Media Authority, Law on Audio and Audio-Visual Media Services in the Republic of Albania, <https://ama.gov.al/wp-content/uploads/2021/06/LAW-NO-97-2013-ON-THE-AUDIOVISUAL-MEDIA-AUTHORITY.pdf> (accessed November 17, 2023).

67 Audiovisual Media Authority, Code of Broadcast, <https://ama.gov.al/wp-content/uploads/2021/06/Broadcasting-Code-of-AMA.pdf> (accessed November 17, 2023).

68 Albania Media Council, Code of Ethics for Journalists, <https://kshm.al/en/code-of-ethics-for-journalists/> (accessed November 17, 2023).

69 Albania Media Council, About Us, <https://kshm.al/en/about-us/> (accessed November 17, 2023).

70 SEE Check, About Us, <https://seecheck.org/index.php/about/> (accessed November 17, 2023).

71 Darvin Murić, Emir Zulejhić, Ivana Živković, Milovan Nikolić, Vesna Radojević, Global Narratives and Local Actors: 150 Days of War in Ukraine and Over 1,500 Disinformation in the Region, SEE Check, July 2022, <https://zastone.ba/app/uploads/2022/08/150-days-of-war-in-ukraine-and-over-1500-disinformation-in-the-region.pdf> (accessed November 17, 2023).

72 Rašid Krupalija, Emir Zulejhić, Darko Brkan, Ajla Škrbić, Tin Puljić, Stefan Janjić, Vesna Radojević, Milan Jovanović, Disinformation During Covid-19 Pandemic, Friedrich-Naumann-Stiftung für die Freiheit Bosnien-Herzegowina, July 2021, [https://www.freiheit.org/sites/default/files/2021-05/disinformation\\_covid-19\\_march\\_2021.pdf](https://www.freiheit.org/sites/default/files/2021-05/disinformation_covid-19_march_2021.pdf) (accessed November 17, 2023).

72 Antidisinfo, <https://antidisinfo.net/> (accessed November 17, 2023).

73 Antidisinfo, Database, <https://antidisinfo.net/database/> (accessed November 17, 2023).

74 South East Europe Digital Rights Network, <https://www.seedigitalrights.network/> (accessed November 17, 2023).

Another initiative related to regional cooperation is the Southeast European Network for Professionalization of Media (SEENPM).<sup>75</sup> This Network also has members from all WB6 countries.<sup>76</sup> SEENPM's work also focuses on media and information literacy, as well as digital rights.

The Regional Cooperation Council (RCC), a “regionally owned and led framework for cooperation in Southeast Europe”<sup>77</sup> is another example of regional cooperation. RCC member countries include all WB6 nations.<sup>78</sup> Its work is focused on various aspects of improving connectivity and cooperation in the SEE region, including the Western Balkans as well as the European and Euro-Atlantic integration of Southeast Europe. With this aim, RCC has different projects with some activities and publications related to disinformation and misinformation.<sup>79</sup> RCC is one of the participants in the Berlin Process.

The Berlin Process, initiated in 2014, is another platform set up for cooperation.<sup>80</sup> Various participants in the process<sup>81</sup> meet annually to discuss topics of importance for regional cooperation, as well as cooperation with the European Union.<sup>82</sup> The Civil Society Forum of the Western Balkans, organized as a part of

the Berlin Process, also “seeks to contribute to regional cooperation, EU-related reforms, and the accession process in the Western Balkans.”<sup>83</sup>

Some regional cooperation can also be seen in the activities conducted by the Centre for European Perspective (CEP), a Slovenian governmental organization active in the Western Balkans.<sup>84</sup> Part of the CEP's focus are information disorders. One of CEP's projects is called “Strengthening Societal Resilience and Countering Foreign Perpetrated Disinformation in six Western Balkans countries.”<sup>85</sup>

## Analysis of WB6 Cooperation with the EU

None of the WB6 countries are members of the EU. Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia are all candidate countries, while Kosovo is a “potential candidate.”<sup>86</sup> This means that any EU legislation related to disinformation, such as the EU AI Act,<sup>87</sup> Digital Service Act (DSA), Digital Markets Act (DMA),<sup>88</sup> and Code of Practice on Disinformation,<sup>89</sup> does not apply to any of the WB6. However, through the Civil Society Forum held in 2023 in Tirana, civil society organizations from the Western Balkans, led by the Citizen's

75 South East European Network for Professionalization of Media, <https://seenpm.org/> (accessed November 17, 2023).

76 South East European Network for Professionalization of Media, Members, <https://seenpm.org/members/> (accessed November 17, 2023).

77 Regional Cooperation Council, About Us, <https://www.rcc.int/pages/2/about-us> (accessed November 17, 2023).

78 Regional Cooperation Council, RCC Participants, <https://www.rcc.int/pages/96/participants> (accessed November 17, 2023).

79 ACIT Centre Radu Magdin (Annex III), Balkan Barometer 2022 - Special Security Edition: Impact of the War in Ukraine on the Western Balkans Public and Business Opinion, Regional Cooperation Council, September 2023, <https://www.rcc.int/pubs/161/balkan-barometer-2022--special-security-edition-impact-of-the-war-in-ukraine-on-the-western-balkans-public-and-business-opinion> (accessed November 17, 2023).

Regional Cooperation Council, “RCC Gathers Key Western Balkan Stakeholders for a Workshop on Media Literacy and Countering Hybrid Threats and Disinformation”, in: Regional Cooperation Council, April 20, 2023, <https://www.rcc.int/news/810/rcc-gathers-key-western-balkan-stakeholders-for-a-workshop-on-media-literacy-and-countering-hybrid-threats-and-disinformation> (accessed November 17, 2023).  
Daskalovski et al. June 2023

80 Berlin Process Summit, What is the Berlin Process?, <https://www.berlinprocess.de/en/what-is-the-berlin-process> (accessed November 17, 2023).

81 Berlin Process Summit, The Participants, <https://www.berlinprocess.de/en/the-participants> (accessed November 17, 2023).

82 Berlin Process Summit, The Achievements and the Future of the Berlin Process <https://www.berlinprocess.de/en/the-achievements-and-the-future-of-the-berlin-process-40> (accessed November 17, 2023).

83 The Civil Society Forum of the Western Balkans, About CSF, <https://wb-csf.eu/about-csf> (accessed November 17, 2023).

84 Centre for European Perspective, <https://www.cep.si/> (accessed November 17, 2023).

85 Centre for European Perspective, Strengthening Societal Resilience and Countering Foreign Perpetrated Disinformation in 6 Western Balkans Countries, <https://www.cep.si/regional-projects/societal-resilience-countering-disinfo-in-6wb/#:~:text=The%20aim%20of%20the%20project,encountering%20cases%20of%20foreign%20disinformation> (accessed November 17, 2023).

86 European Union, Joining the EU, [https://european-union.europa.eu/principles-countries-history/joining-eu\\_en](https://european-union.europa.eu/principles-countries-history/joining-eu_en) (accessed November 17, 2023).

87 European Parliament, EU AI Act: First Regulation on Artificial Intelligence”, <https://www.europarl.europa.eu/news/en/headlines/society/20230601STO93804/eu-ai-act-first-regulation-on-artificial-intelligence> (accessed November 17, 2023).

88 European Commission, The Digital Services Act Package, <https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package> (accessed November 17, 2023).

89 European Commission, The 2022 Code of Practice on Disinformation, <https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation> (accessed November 17, 2023).



Association “Why Not” from BiH, advocated to have these regulations applied to the region.<sup>90</sup>

Besides offering a platform for cooperation between the WB6, the Berlin Process also facilitates cooperation with EU institutions.<sup>91</sup> The process is not a part of the EU’s Stabilization and Accession Process (SAP), but an independent format, focused on the WB6 region.<sup>92</sup>

The SEE Check network is also implementing a large project supported by the European Union. It provides means for strengthening regional cooperation and joined production of fact-checking content and regional analysis. It also plans activities for expanding and strengthening the network and integrating it more in global and European developments in the field.

Fact-checking organizations from the WB6 countries also cooperate with the EU through the work of the European Fact-Checking Standards Network (EFCSN).<sup>93</sup> The network is supported by the EU. EFCSN is an association of fact-checking organizations committed to the standards outlined in the European Code of Standards for Independent Fact-Checking Organizations.<sup>94</sup> Several organizations from the Western Balkans have so far become verified members of the EFCSN.

The Regional Cooperation Council, mentioned above as one of the facilitators of regional cooperation, is also co-funded by the European Union. RCC, through different activities, assists the region “in deepening the process of EU integration.” Its participants are, among others, different EU member states, as well as representatives of the EU.

The Western Balkans Digital Summit, supported by the RCC, also reflects aspects of cooperation with the EU.<sup>95</sup> The Summit is an opportunity for cooperation, as well as the exchange of knowledge and experience between the WB6 and the EU, often hosting many speakers who are representative of the EU.<sup>96</sup>

The regional presence of the EU in the field of fighting disinformation is also visible through the work of the European External Action Service (EEAS) strategic communication Western Balkans Task Force that is engaged in monitoring, analyzing, and assessing information environments, including disinformation, information manipulation, and interference in the region, as well as supporting the implementation and understanding of EU policy in the region.<sup>97</sup>

## Conclusion and Recommendations

The Western Balkan region has, over the past few years especially, become very fertile soil for various manifestations of information disorder. A global change in the modes of information publishing and consuming, together with a lack of regulation in this sector, have brought different actors on the scene. They are both local and foreign, and they produce, publish, and republish different types of manipulated information.

There is a swarm of anonymous portals that publish sensationalistic content just to monetize it through visits. Then, there are a lot of media outlets owned or influenced by governments or other political actors that publish disinformation as part of a political agenda. A number of foreign-owned media in the region serve as proxies for different foreign in-

90 Darko Brkan and Tijana Cvjetićanin, Key Recommendations of the Thematic Working Group on Digitalization and Connectivity, The Civil Society Forum of the Western Balkans, October 2023, <https://wb-csf.eu/publications-csf/key-recommendations-of-the-thematic-working-group-on-digitalization-and-connectivity> (accessed November 17, 2023).

91 Berlin Process Summit, The Berlin Process, <https://www.berlinprocess.de/#about-berlin-process-section> (accessed November 17, 2023).

92 Berlin Process Summit, The Berlin Process and the EU’s Policy towards the WB, <https://www.berlinprocess.de/en/the-berlin-process-and-the-eus-policy-towards-the-wb> (accessed November 17, 2023).

93 European Fact-Checking Standards Network, <https://efcsn.com/> (accessed November 17, 2023).

94 European Fact-Checking Standards Network, Code of Standards, <https://efcsn.com/code-of-standards/> (accessed November 17, 2023).

95 Regional Cooperation Council, “RCC Co-Organizes 6th Western Balkans Digital Summit”, in: Regional Cooperation Council, October 4, 2023, <https://www.rcc.int/events/1548/rcc-co-organizes-6th-western-balkans-digital-summit> (accessed November 17, 2023).

96 European Commission, Sixth Western Balkans Digital Summit, <https://digital-strategy.ec.europa.eu/en/events/sixth-western-balkans-digital-summit> (accessed November 17, 2023).

97 European Union External Action, “Tackling Disinformation: Information on the Work of the EEAS Strategic Communication Division and its Task Forces (SG.STRAT.2)”, European Union External Action, October 12, 2021, [https://www.eeas.europa.eu/countering-disinformation/tackling-disinformation-information-work-eeas-strategic-communication-division-and-its-task-forces\\_und\\_en](https://www.eeas.europa.eu/countering-disinformation/tackling-disinformation-information-work-eeas-strategic-communication-division-and-its-task-forces_und_en) (accessed November 17, 2023).



fluences, but also a variety of local players are propelling the same narratives for different reasons.

At the same time, governments, civil society, and media have all been unable to contain this problem, partly because of a lack of will or resources, but mostly due to the fact that there is a very limited number of things that can be done on the matter within all countries of the region. The issue of disinformation needs to be tackled on a global level, with the participation of all involved stakeholders, and, above all, with the active involvement of the very large online platforms and search engines. Some processes on this, especially at the EU level, have already started, and Western Balkan countries need to be a part of this.

Given the fact that the region is not a part of these processes, the global challenges that disinformation brings are even more amplified in the WB6, since there are no sufficient mechanisms being put in place to tackle them. The implementation of all of the aforementioned acts as well as the European Elections in 2024 will surface most of the potential weaknesses of the acts as they are now. However, the most significant weakness that is already visible is the fact that the WB6 region is not covered by this legislation. By not including this region, the efficacy of the legislation is in jeopardy, since the digital environment does not recognize state borders. Significant part of the region speaks the same language as one of the EU member states, making it even easier for malign actors to bypass the provisions of the legislation, if it is applied only to the European Union.

With all of this in mind, the actionable items recommended to stakeholders in this field are listed below.

Governments of the WB6 region should:

- Ask from the EU and very large online platforms and search engines that the implementation of the new digital legislation (Digital Services Act, Digital Markets Act, AI Act) be expanded to the Western Balkans. This could be done through an expedited expanding of the EU's Digital Single Market to all countries of the WB region, as a step in their EU integration process;

- Adopt EU legislation into national laws and improve the WB countries' digital readiness;
- Take a systemic approach to tackling the issue of low media and information literacy;
- Work on improving media credibility by promoting and supporting credible media work and creating conditions for the sustainability media sources that produce credible content.

The European Union should:

- Work with WB6 governments to prepare them for adopting EU digital legislation in national laws;
- Taking into account the importance of the Western Balkans accession process as well as potential threats to democratic processes (such as EU elections), the EU should consider expanding the EU's Digital Single Market to the WB6 in order to assure that the effects of the EU digital package of legislation are also seen in the WB6.

Media in the WB6 should:

- Improve their fact-checking capacities and work more with fact-checkers and fact-checking networks to reduce the dissemination of disinformation;
- Improve the self-regulation mechanisms in place, especially focusing on the effectiveness of the implementation of their work.

Civil-society organizations in the WB6 should:

- Work with their EU counterparts to advocate both in the EU and outside of it for the expansion of the new digital legislation in the region;
- Work on improving fact-checking and media literacy skills of CSOs and media in the region.

Very large online platforms and search engines should:

- Commit to the implementation of the Code of Practice Against Disinformation in the WB region;
- Introduce and implement anti-disinformation policies and programs throughout the region, such as cooperation with fact-checkers.

# Polarization and Dialogue on Social Media

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This paper focuses on the potential of social media in facilitating dialogue, a type of conversation that is civil and oriented to the other. Promoting dialogical communication is crucial for supporting democracy because it encourages constructive participation and can reduce polarization. Research on how people in Serbia discuss the legacy of the war of the 1990s on the territory of the former Yugoslavia on Facebook, Twitter, and in face-to-face meetings shows that social media have a limited potential to facilitate dialogue, with some differences between the various platforms.<sup>2</sup> This can be explained by the architecture of social media, norms of acceptable behavior, actors who participate, and a sensitivity of the topics discussed in this socio-political context. This research finds that attitude change, in the direction of accepting more open viewpoints, happens mostly during lengthy exchanges of arguments (which can be called engaged interactions, and which are an example of dialogical communication). Addressing disinformation (intentionally false information) should thus not be limited to identifying and correcting disinformation online but should also include fostering dialogical communication online. Research insights further indicate that identity threat is another impediment to attitude change toward accepting ingroup responsibility for war crimes.<sup>3</sup> This paper recommends the EU to encourage tech companies to adopt product design solutions that will promote dialogical communication and to work together with civil society actors on creating policies and training in online political communication that will address the norms of acceptable behavior. All parties concerned, including tech companies, the EU, civil society, and national governments should more effectively identify, report, and remove fake social media accounts engaged in smear campaigns. Lastly, domestic, and international media, as well as politicians and government officials, should be discouraged and prevented from stereotyping ethnic and national groups and from self-stereotyping.

## Setting the Scene

Political polarization is one of the key impediments to democracy,<sup>4</sup> and social media are found to contribute to widening existing divides and distrust in societies that lead to polarization.<sup>5</sup> Over 80

percent of the population in the Western Balkans in 2023 used the internet to access social media platforms such as Facebook,<sup>6</sup> in comparison to about 60 percent of the population in the United States<sup>7</sup> and the United Kingdom.<sup>8</sup> The omnipresence of social media requires a better understand-

- 1 This research is funded by the European Research Council, grant no. 772354, as part of the larger project ‘Justice Interactions and Peacebuilding: From Static to Dynamic Discourses across National, Ethnic, Gender and Age Groups’ based at the London School of Economics and Political Science.
- 2 Sanja Vico, “Cognitive Dissonance in Face-to-face and Social Media Interactions in Relation to the Legacy of War,” in: *International Journal of Communication*, 16, 2022, 5739–5758.
- 3 Sanja Vico, “Stereotyping, Social Media, and the Legacy of War,” in: *Journal of Statebuilding and Intervention*, forthcoming 2024.
- 4 Andres Reiljan, “‘Fear and Loathing across Party Lines’ (also) in Europe: Affective Polarisation in European Party Systems,” in: *European Journal of Political Research*, 59, 2020, 376–396.
- 5 Joshua Aaron Tucker, Andrew Guess, Pablo Barbera, Cristian Vaccari, Alexandra Siegel, Sergey Sanovich, Denis Stukal, and Brendan Nyhan, “Social Media, Political Polarization, and Political Disinformation: A Review of the Scientific Literature,” in: *Social Science Research Network*, 2018.
- 6 Miladin Kovacevic, Vladimir Sutic, Uros Rajcevic and Ivana Minaeva, *The Use of Information-Communication Technologies in the Republic of Serbia*, Statistical Office of the Republic of Serbia, <https://www.stat.gov.rs/publikacije/publication/?p=15430> (accessed January 8, 2024).
- 7 Brooke Auxier and Monica Anderson, *Social Media Use in 2021*, Pew Research Center, <https://www.pewresearch.org/internet/2021/04/07/social-media-use-in-2021/> (accessed January 8, 2024).
- 8 Ipsos Synthesio, *2023 Social Media Usage Report*, <https://resources.ipsos.com/social-media-usage-report-23-download.html> (accessed January 8, 2024).

ing of their role in democratic processes. Studies of the relationship between social media and polarization have predominantly focused on algorithm-supported filter bubbles and echo chambers and the spread of disinformation through social media.<sup>9</sup> More attention should be paid to the capacity of social media to facilitate dialogue among citizens on pressing public and political matters and how this type of engaged interaction could tackle the spread of disinformation and hate speech online. Dialogue is not just a talk. Dialogue has certain characteristics; the most fundamental ones are active listening to the other and civility.<sup>10</sup> While there is some disagreement about what uncivil exactly means, i.e. whether it exclusively refers to intolerant communication or if it includes impolite communication too, the bottom line is that disagreements and heated discussions are good for democracy, but hate speech, discrimination, and threats are not.<sup>11</sup> Therefore, it should be distinguished between confrontational and conflictual interactions. Confrontational interactions are the ones wherein interlocutors express disagreements respectfully; conflictual interactions are characterized by personal attacks, threats, and a general lack of constructive exchange of arguments.<sup>12</sup>

According to research on cognitive dissonance in face-to-face and social media interactions in relation to the legacy war, with a focus on former Yugoslavia,<sup>13</sup> interactions on social media are often conflictual, especially on X (formerly known as Twitter), while interactions in face-to-face encounters are sometimes confrontational but not conflictual. These insights contradict some previous research on the role of social media in facilitating

deliberation,<sup>14</sup> which can be explained by the fact that the war legacy and ingroup responsibility for war crimes are highly sensitive topics. The difference between social media and face-to-face interactions can be explained by the architecture of social media and social norms of acceptable behavior on these media. It has been argued that social media played a transformative role in coordinating civic action and bringing about a discourse shift by raising awareness and mobilizing support. Consequently, these media were credited with emancipatory powers.<sup>15</sup>

However, these studies have overlooked that there was seldom a pre-existing critical mass supportive of the cause. In highly polarized societies, such as the societies in the Western Balkans where denial of ingroup responsibility for war crimes and other war-time human rights violations is still widespread,<sup>16</sup> social media's potential in facilitating attitude change and encouraging openness towards the perspective of others is much more limited.

People seldom change attitudes when they are faced with new information that counters their pre-existing (strong) attitudes and beliefs. Research shows that attitude change happens in dialogues or “engaged” interactions that are lengthy exchanges of arguments, that include back-and-forth steps, where meanings are negotiated.<sup>17</sup> This can explain why tackling disinformation on social media should not be limited to identifying and correcting false information, but importantly it needs to be supplemented with dialogical communication (engaged interaction) between people. Acknowledgment of war crimes committed by members of the same ethnic origin is often considered crucial for reconciliation

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- 9 Alex Bruns, *Are Filter Bubbles Real?*, Cambridge: Polity Press, 2019; Samuel C. Rhodes, “Filter Bubbles, Echo Chambers, and Fake News: How Social Media Conditions Individuals to Be Less Critical of Political Misinformation,” in: *Political Communication* 39(1), 2021, 1-22.
- 10 Michael L. Kent, and Maureen Taylor, “Fostering Dialogic Engagement: Toward an Architecture of Social Media for Social Change,” in: *Social Media and Society*, 7(1), 2021, 1–10.
- 11 Rossella Rega, Rita Marchetti, and Anna Stanziano, *Incivility in Online Discussion: An Examination of Impolite and Intolerant Comments*, *Social Media + Society*, 2023, 1–12.
- 12 Vico, 2022.
- 13 Vico, 2022.
- 14 Zizi Papacharissi, “Democracy Online: Civility, Politeness, and the Democratic Potential of Online Political Discussion Groups,” *New Media and Society* 6(2), 2004, 259-283.
- 15 Manuel Castells, *Communication Power*, Oxford: Oxford University Press, 2013; Zeynep Tufekci, *Twitter and Tear Gas: The Power and Fragility of Networked Protest*, New York: Yale University Press, 2017.
- 16 Marko Milanović, “The Impact of ICTY on the Former Yugoslavia: An Anticipatory Post-mortem,” in: *American Journal of International Law*, 110(2), 2016, 233–259.
- 17 Vico, 2022.

between formerly confronted ethnic groups in the conflict and for societies to move on. Research on intra-ethnic interactions on the legacy of the Yugoslav wars of the 1990s<sup>18</sup> shows that the combination of two factors encourages this acknowledgement and the change of the dominant discourse of denial: first, the type of environments where people interact and second, the type of actors (from the bottom-up) who interact. Due to the lack of readiness of state actors to fully address the legacy of war, human rights activists have often been the chief promoters of the transitional justice process. However, their roles in transitional justice in the Western Balkans has also been a subject of criticism because their agenda and untransparent funding are thought to alienate ordinary people.

“Engaged” interactions or dialogues, are most prevalent in face-to-face conversations between ordinary people. It is present to a lesser extent on Facebook and almost completely absent on X, especially when ordinary people interact with activists. The architecture of X and their norms of behavior encourage “self-communication,” a type of communication oriented to oneself rather than to the other. Facebook, conversely, is characterized by semi-dialogical communication, and face-to-face communication is found to be the most dialogical. Although there are ways to exchange opinions through the comments section, these comments rarely have the characteristics of “engaged” interactions and serve more for people to either express agreement or disagreement with a statement in a way that discredits the interlocutor. This insight from the study on the Western Balkans is in line with studies conducted in the context of the United States that find that Facebook enables more symmetrical conversations, unlike platforms where anonymous profiles are more common.<sup>19</sup>

Another key problem on the platforms, where profiles are public by default, is the rise of the use of trolls (smear campaigns rallied by fake social media accounts) to undermine public debate and discourage people from participating. This is an endemic phenomenon in the Western Balkan countries.<sup>20</sup> Research shows that about 70 percent of the most active Twitter profiles that engaged in attacking and disputing the campaign of paying tribute to the victims of Srebrenica in Serbia were created and existed only for the duration of the campaign. A few years later, in 2020, Twitter removed thousands of accounts that were promoting the ruling party in Serbia.<sup>21</sup> In Montenegro, similarly, the prevalent use of trolls to attack and disqualify political opponents and those who think differently on Twitter was noted. This revolved around highly sensitive topics, such as the status of the Serbian Orthodox Church in Montenegro and the 2020 Montenegrin parliamentary elections. Trolls were also used to interfere in political discourse in neighboring countries.<sup>22</sup> 782 violations of digital rights (human rights in digital spaces) were recorded in the Western Balkans between September 2021 and August 2022, with 77 cases in Bosnia and Herzegovina, 89 cases in Kosovo, 83 cases in North Macedonia, 65 cases in Montenegro, and 124 cases in Serbia (124).<sup>23</sup>

Uncivil or intolerant communication on social media is one of the key drivers of non-participation on social media on contentious topics. Focus group participants in a recent study with a focus on the Western Balkans identified intolerant and hostile public discourse on social media as a key problem that discouraged them from participating in discussions on social media. They appreciated the civility of interactions in the focus groups, which they described as respectful and open. Oth-

18 Vico, 2022.

19 Daniel Halpern and Jennifer Gibbs, “Social Media as a Catalyst for Online Deliberation? Exploring the Affordances of Facebook and YouTube for Political Expression,” in: *Computers in Human Behavior* 29, 2013, 1159–1168.

20 Radio Free Europe, “Twitter Removes Thousands of Accounts ‘Promoting’ Serbian Ruling Party,” in: Radio Free Europe, April 2, 2020, <https://www.rferl.org/a/serbia-twitter-vucic-sns-serbian-progressive-party/30526199.html> (accessed January 8, 2024); Zeljka Vucinic, “‘Out of Control’: Bots and Trolls Multiply in Montenegro,” in: BIRN, December 5, 2022, <https://balkaninsight.com/2022/12/05/out-of-control-bots-and-trolls-multiply-in-montenegro/> (accessed January 8, 2024).

21 Radio Free Europe, 2020.

22 Vucinic, 2022.

23 Mat Mastracci, “Hate Speech and Disinformation Fuel Digital Rights Abuses in Balkans,” BIRN, March 30, 2023, <https://balkaninsight.com/2023/03/30/hate-speech-and-disinformation-fuel-digital-rights-abuses-in-balkans/> (accessed January 8, 2024). This report included Croatia, Hungary, and Romania, and excludes Albania.

er motives of non-participation and a reluctance to acknowledge ingroup responsibility for war crimes can be explained by concerns of acting as ‘bad ambassadors’ or being accused as ‘traitors.’ People often perceive that such an acknowledgement can reinforce negative stereotypes about their national or ethnic groups and thereby undermine their reputation and social standing on an international level. This is called identity threat. Consequently, people may withdraw from such discussions or avoid the acknowledgement. These are unintended consequences of visibility that social media afford. Individuals strive to defend their country’s reputation on an international stage regardless of how central their national identity is to them when they perceive to be viewed in the light of this identity.<sup>24</sup>

Human rights activists had a varying role in encouraging the acknowledgement. Their effectiveness depended on the environment in which they interacted and their approach to communication. Face-to-face interactions were better suited. Activists who were merely validating the viewpoints of others or rejecting them without prior engagement in an exchange of arguments did not have an effective role in changing the discourse of denial. The research also showed ordinary people, who advocated the discourse of responsibility, played an important role in encouraging acknowledgement among their compatriots. The reason for this can be that human rights activists are often discredited in the media and by leading politicians – their motives are often questioned, which makes ordinary people less trusting of activists than other citizens.<sup>25</sup>

There are five main conclusions in relation to the role of social media in facilitating dialogue and attitude change in the Western Balkans.

First, the insights show that attitude change rarely occurs when people are presented with new information because they interpret this within an existing system of beliefs that are durable and mutually reinforcing. In “engaged” interactions or dialogues,

existing beliefs are re-examined which then enables attitude change. Second, social media can be a good tool for mobilizing support, but they currently have a limited role as an arena for dialogues that can facilitate the change of dominant discourses on highly sensitive and contentious topics. This is largely because these media are characterized by “self-communication” due to its architecture, social norms of acceptable behavior, and a rise in the use of trolls. Third, alongside uncivil and intolerant interactions on social media, identity threat is a prevalent motive that either drives people away from participating in contentious topics on social media or hinders the acknowledgement of ingroup responsibility for war crimes. This insight is specific to the Western Balkans region and more applicable to countries and ethnic groups in the region that are predominantly seen as perpetrators of war crimes. Fourth, civil society organizations and activists have been criticized for estrangement of ordinary people. However, this is not a universal case, and their success depends on their approach to communication as well as the type of environment in which they engage with ordinary people. Fifth, the role of social media, similarly, cannot be understood regardless of the actors who participate and interact.

### **Regional Cooperation and Policy Responses in the Western Balkans**

Recom is the most notable and most comprehensive regional initiative that facilitated dialogues (in a face-to-face environment) on the legacies of human rights violations during the Yugoslav wars of the 1990s. It was established in 2006 by the Humanitarian Law Centre in Serbia, Documenta in Croatia, and the Research and Documentation Centre in Bosnia and Herzegovina. Since then, 128 local consultations have taken place with victims, families of victims and missing persons, refugees, human rights organizations, and others with an aim to establish facts about war crimes and other violations of human rights in these wars. This initiative was exclusive to face-to-face dialogues. When it comes to interactions on social media, the United Nations-supported initiative in the region in 2023 has a goal to empower

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24 Vico, forthcoming 2024.

25 Vico, 2022.



younger people to confront hate speech and disinformation online. This initiative has particularly focused on gender inequalities, stating that especially women and girls are the targets of hate speech.<sup>26</sup> While the report states the initiative teaches young people how to identify, report, and counter various forms of online hate speech, the report does not detail or specify how exactly they confront such speech and disinformation online.

Solutions offered by most initiatives that address disinformation and hate speech online revolve around supporting media literacy and fact-checking.<sup>27</sup> Dialogical communication or “engaged interactions” are currently missing as an approach to addressing hate speech and disinformation online, and thereby reducing polarization. While polarization in the Western Balkans societies may be exacerbated by social media, causes are beyond this sphere. In terms of the legacies of the wars in the former Yugoslavia, there is still no consensus in the region on the character of some events during these wars. For example, Serbia brought a declaration about the massacre in Srebrenica in 2010, while Bosnia and Herzegovina outlawed genocide denial in 2021. On the other hand, Serbs mourn the displacement of 200,000 Serbs and a few hundred deaths during Operation Storm, while Croatia celebrates victory in this military-police operation that put an end to the four-year-long conflict.<sup>28</sup> There is a prevalent trend of competitive victimhood in the region which means that each nation considers itself a victim and the other group(s) as a perpetrator(s).<sup>29</sup> This lack of consensus and the widespread distrust in domestic and international institutions have enabled polarization and the spread of disin-

formation on social media. While polarization and disinformation online may be a universal problem that no country is immune to, reports note the Western Balkans’ vulnerability to foreign influences.<sup>30</sup>

## EU Digital Agenda for the Western Balkans

The EU has recognized the importance of focusing on digital technologies and their role in democracy as seen in the EU Digital Agenda for the Western Balkans from 2018. The focus has been on increasing cybersecurity and trust, building infrastructure (investing in broadband connectivity), increasing the digital literacy of the citizens (including public administration), and boosting research and innovation.<sup>31</sup> Recommendations have also been made in terms of the adoption of technologies that uphold high EU standards of privacy.<sup>32</sup> However, the EU has not taken into account the importance of fostering dialogical communication on social media in its Digital Agenda toward the six Western Balkan countries, as a way of promoting and strengthening democracy in the region. EU policy responses in 2021 were oriented toward strengthening democracy and the quality of governance in the Western Balkans primarily through supporting independent media outlets. These recommendations were limited in scope because they addressed only one part of the wider problem.

The Strengthened Code of Practice against Disinformation (CoP) has recognized the need to address the spread of disinformation and generally to foster “responsible digital behavior” by “demonetizing the dissemination of disinformation, guaranteeing transparency of political advertising, enhancing co-

26 United Nations Peacebuilding, “Nurturing Safer Digital Spaces: Empowering Youth Against Hate Speech in the Western Balkans,” <https://www.un.org/peacebuilding/content/nurturing-safer-digital-spaces-empowering-youth-against-hate-speech-western-balkans> (accessed January 8, 2024).

27 European Union External Service, Four Western Balkans’ Fact-Checking Organizations Join Facebook’s Platform against Disinformation, [https://www.eeas.europa.eu/eeas/four-western-balkans%E2%80%9999-fact-checking-organisations-join-facebook%E2%80%9999s-platform-against-disinformation\\_en](https://www.eeas.europa.eu/eeas/four-western-balkans%E2%80%9999-fact-checking-organisations-join-facebook%E2%80%9999s-platform-against-disinformation_en) (accessed January 8, 2024).

28 Humanitarian Law Centre, On the Occasion of 21 Years since Operation “Storm”: Serbia to Demonstrate Care for Victims through Actions, <http://www.hlc-rdc.org/?p=32525&lang=de> (accessed January 8, 2024).

29 Milanovic, 2016.

30 European Parliament, Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them, February 21, 2021, [https://www.europarl.europa.eu/thinktank/en/document/EXPO\\_STU\(2020\)653621](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2020)653621) (accessed January 8, 2024).

31 European Commission, European Commission Launches Digital Agenda for the Western Balkans, [https://ec.europa.eu/commission/presscorner/detail/es/IP\\_18\\_4242](https://ec.europa.eu/commission/presscorner/detail/es/IP_18_4242) (accessed January 8, 2024).

32 European Digital SME Alliance, DIGITAL SME Puts Forward a New Digital Agenda for the Western Balkans, <https://www.digitalsme.eu/digital-sme-puts-forward-a-new-digital-agenda-for-the-western-balkans/#:~:text=DIGITAL%20SME%20offers%20five%20policy,the%20Western%20Balkans%2C%20among%20others> (accessed January 8, 2024).

operation with fact-checkers, and facilitating researchers access to data.”<sup>33</sup> CoP has also identified the need to empower users, but this seems to be limited to detecting and reporting false and/or misleading content.<sup>34</sup>

## Conclusion and Recommendations

In the light of the discussion in this paper, there are four key conclusions and recommendations.

- First, it is important to highlight that dialogical communication has a certain set of characteristics, the main ones being active listening (an orientation to the other) and civility. The EU’s efforts should include fostering dialogical communication online as a means of building trust and tackling the spread of dis- and misinformation. This is one of the areas that can be also covered under “boosting research and innovation.” Polarization and dialogues on social media are predicated on the architecture of social media, social norms, actors, and divisiveness of the topics discussed in a particular context. Therefore, the EU’s efforts can be both directed to encouraging tech companies to take action in terms of product design solutions and to working with civil society actors on creating policies and organizing training in online political communication to tackle the norms of acceptable behavior.
- Second, ‘an army’ of fake social media accounts (trolls) aimed at promoting political parties, regimes, and particular agendas, should be more effectively identified and removed. While the tech companies are responsible for removing such accounts from their platforms, all concerned parties can engage in identifying and reporting such accounts, including the EU, national governments, and civil society.
- Third, different views are good for democracy, but polarization is not. Therefore, how people communicate can be even more important than changing attitudes in the direction of accepting
- Fourth, research insights shared in this paper show that identity threats can contribute to polarization, and hinder participation and dialogic communication. Domestic or international media, as well as national governments and politicians, should refrain from stereotyping certain groups, such as ethnic and national, and from self-stereotyping. The efforts of the EU and international organizations could also be oriented toward discouraging and preventing such rhetoric.

more inclusive and more tolerant viewpoints. Moreover, even changed attitudes towards more openness to the perspectives of others are prone to reverting to more exclusive perspectives amid new political turmoil. A recently published policy paper recommends organizing training in political communication about “conversational strategies that allow confrontational exchanges where people can express different opinions, without descending into conflict.”<sup>35</sup> Additionally, civil society organizations in the region should specifically organize training in online political communication where users can learn how to engage with opposed views on social media constructively.

33 European Commission, The Strengthened Code of Practice on Disinformation, 2022, <https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation#:~:text=This%20strengthened%20Code%20of%20Practice,regulatory%20standards%20to%20combat%20disinformation> (accessed January 8, 2024).

34 European Commission, 2022.

35 Ivor Sokolic, Sanja Vico, and Denisa Kostovicova, Inter- and Intra-Ethnic Dialogues on War-time Violence and its Legacies, LSE European Institute, London, 2023, <https://www.lse.ac.uk/european-institute/Assets/Documents/Research/JUSTINT-Policy-Paper-Inter-and-Intra-ethnic-Dialogues.pdf>

# Cyber-Securing Democracy: Cybersecurity Challenges Amidst Malign Foreign Influence in the Western Balkans

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The rapid digital expansion, also driven by the Covid-19 pandemic, has heightened the risk of cyber incidents across the Western Balkans. Public institutions, Small and Medium-sized Enterprises (SMEs), media groups, and civil society organizations face targeted cyberattacks tailored to local contexts. Regulatory obstacles, alongside the lack of protective measures for digital users and consumers, compounded by platform unaccountability, exacerbate these challenges. Cybersecurity and resilience are also a crucial issue within the context of malign foreign influence, extending beyond mere policy and technological capacity challenges for the Western Balkans.

The European Union (EU), through annual country reports, identifies significant cybersecurity obstacles in the Western Balkans. While important progress has been made across the Western Balkans, serious challenges persist. In this context of particular concern is Bosnia and Herzegovina which faces the most challenges with respect to policy, regulation, institutional setup, and capacity. On the other hand, Serbia, with close ties to Russia and China, must align with EU standards. The paper emphasizes the importance of regional cooperation in enhancing cyber resilience, with information exchange and knowledge sharing pivotal in this process.

The forthcoming Center for Cybersecurity Capacity Building in Podgorica/Montenegro offers an opportunity for new momentum in regional cybersecurity cooperation. The Western Balkan countries recognize the significance of regional cooperation, underscored by the conclusions and agreements of the 2023 Berlin Process Summit in Tirana.<sup>1</sup> The EU's support, through funding and technical assistance initiatives, is instrumental in advancing cyber resilience in the region.

## Setting the Stage

Before delving into the discussion of cybersecurity and cyber resilience in the Western Balkans, it is important to clarify key concepts that will be widely used in this paper.

The term “cybersecurity,” as the article “Defining Cybersecurity” by Dan Craigen, Nadia Diakun-Thi-

bault, and Randy Purse points out, lacks a universally accepted definition.<sup>2</sup> Typically viewed through a narrow, technical lens, the authors argue for a broader understanding that includes organizational, economic, social, political and human dimensions. The EU Cybersecurity Act formally defines it as activities necessary to protect network and information systems, their users, and others affected by cyber threats.<sup>3</sup> This definition underscores the mul-

1 Conclusions and Agreements – Berlin Process Summit 2023 in Tirana, Chair's Conclusions, October, 2023, [https://www.berlinprocess.de/uploads/documents/chairs-conclusions-berlin-process-summit-2023\\_1697629712.pdf](https://www.berlinprocess.de/uploads/documents/chairs-conclusions-berlin-process-summit-2023_1697629712.pdf) (accessed February 15, 2024)

2 Dan Craigen, Nadia Diakun-Thibault, and Randy Purse, “Defining Cybersecurity,” in: Technology Innovation Management Review, October 2014.

3 European Union, EU Cybersecurity Act, Article 2, June 7, 2019, <https://eur-lex.europa.eu/eli/reg/2019/881/oj> (accessed January 2024).

tifaceted nature of cybersecurity, extending beyond mere technical aspects.

“Cyber Resilience” in the EU Cybersecurity Act context refers to the ability to anticipate, withstand, recover from, and adapt to cyber threats and attacks.<sup>4</sup> This involves enhancing cybersecurity expertise, especially in critical infrastructures and digital services, providing guidance and best practices, and establishing a centralized information hub for accessible cybersecurity information.

The EU’s Cybersecurity Act also defines a ‘cyber threat’ as: “Any potential circumstance, event or action that could damage, disrupt, or otherwise adversely impact network and information systems, the users of such systems, and other persons.”<sup>5</sup> This definition broadens the scope of cybersecurity concerns to include any possible situations or actions that might negatively affect digital systems and their users, as well as other individuals potentially impacted by such threats.

Digital transformation, as outlined in the European Commission’s annual country reports under Chapter 10: Digital Transformation and Media, is a key indicator of the Western Balkans’ readiness for EU membership.<sup>6</sup> It involves supporting the effective functioning of the internal market in electronic communications, e-commerce, and audiovisual services, ensuring consumer protection and the availability of modern digital services.

This paper also addresses the context of the Western Balkans’ integration into the EU, focusing on transposing EU rules and standards into national legislation, particularly in information technology. The Eu-

ropean Commission’s proposal to include the Western Balkans in the EU’s digital market highlights the importance of cybersecurity and cyber-resilience in EU-Western Balkans relations. The paper analyzes the region’s standing in these areas based on the European Commission’s reports and independent assessments from credible think tanks.

Furthermore, the paper considers the impact of foreign influence. Cybersecurity is closely intertwined with malign foreign influences, a concern that is particularly important in the Western Balkans, an example being cyberattacks from Iran. Cyberattacks have the potential to seriously disrupt democratic processes.<sup>7</sup>

Accordingly, bolstering cyber resilience against international and external threats is paramount to safeguard democratic values and institutions.

China often presents a key point of concern in the Western Balkans’ cybersecurity landscape, due to the growing presence in the region of Chinese telecommunication companies such as ZTE and Huawei.<sup>8</sup> The European Commission’s June 2023 assessment highlighted the elevated risks associated with Huawei and ZTE in comparison to other 5G providers.<sup>9</sup> However, the EU has yet to reach a unanimous decision on banning Huawei, partly due to strong ties between Huawei, China, and certain EU member states.<sup>10</sup>

Serbia stands out within the Western Balkans for its deepening connections with China, solidified further by a free trade agreement in October 2023,<sup>11</sup> flagged as a “strategic concern” by the European Commission in its 2023 Country Report for Ser-

4 European Union, EU Cybersecurity Act, Article 4, June 7, 2019, <https://eur-lex.europa.eu/eli/reg/2019/881/oj> (accessed January 2024).

5 European Union, EU Cybersecurity Act, Article 2, June 7, 2019, <https://eur-lex.europa.eu/eli/reg/2019/881/oj> (accessed January 2024).

6 See the country reports for the Western Balkan countries as part of the 2023 Enlargement package, [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_23\\_5633](https://ec.europa.eu/commission/presscorner/detail/en/IP_23_5633)

7 Rainer W. Gerling, Cyber Attacks on Free Elections, February, 2017, Max Planck Research, [https://www.mpg.de/11357138/W001\\_Viewpoint\\_010-015.pdf](https://www.mpg.de/11357138/W001_Viewpoint_010-015.pdf) (accessed January 2024).

8 Iva Martinovic and Reid Standish, “Huawei, Offshore Deals, And The Pandora Papers: ‘How A Large Chinese Company Operates In Serbia’”, Radio Free Europe, October 27, 2021, <https://www.rferl.org/a/china-huawei-serbia-lobbyists-offshore/31531520.html> (accessed February 15, 2024)

9 European Commission, Commission Announces Next Steps on Cybersecurity of 5G Networks in Complement to Latest Progress Report by Member States\*, [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_23\\_3309](https://ec.europa.eu/commission/presscorner/detail/en/IP_23_3309) (accessed January 2024).

10 Christina Cheng, “Is the EU Finally Headed Towards a Ban on Huawei?,” in: China Observers in Central and Eastern Europe (CHOICE), September 7, 2023, <https://chinaobservers.eu/is-the-eu-finally-headed-towards-a-ban-on-huawei/> (accessed January 2024).

11 Seb Starcevic, “Into the Honey Pot: Serbia and China Ink Free Trade Deal,” in: Politico, October 18, 2023, <https://www.politico.eu/article/serbia-and-china-sign-free-trade-deal/> (accessed February 15, 2024)

bia.<sup>12</sup> Given this paper’s focus on the nexus of malign foreign influence, cybersecurity, democracy, and digitalization, Serbia’s unique relationship with China receives heightened attention in the analysis compared to other Western Balkan countries.<sup>13</sup> Moreover, China is given greater prominence than other malign state actors such as Russia and Iran due to existing research suggesting that China’s access to Western Balkans’ cyber frameworks is uniquely extensive.

### Background into the Cyberthreats and Cybersecurity Challenges in the Western Balkans

Existing research<sup>14</sup> underscores the prevalence of cybercrime as the predominant threat in Western Balkan regional economies. Digitalization, accelerated by the global pandemic, has expanded the risk landscape, resulting in a notable uptick in incident reports received by national authorities. Smaller entities, including small- and medium-sized enterprises, media actors, and civil-society organizations, are increasingly encountering challenges emanating from the cybersphere. The sophistication of attack methods has grown, characterized by more refined tailoring of malicious content to local languages and contexts.

Furthermore, discussions from the thematic working group on digitalization and connectivity at the civil society and think tank forum of the Berlin Process in 2023 show that the countries in the Western Balkans face regulatory challenges and difficulties in curbing illegal and harmful online content.<sup>15</sup> The lack of functional mechanisms to protect citizens and their rights as digital service users and consumers exacerbates the issue. The absence of platform accountability further adds to the challenges, as the operations of very large online platforms inadver-

tently incentivize disinformation-based business models, creating vast gray areas in the regional digital market. This lack of oversight negatively impacts media credibility, compromises information integrity, jeopardizes democratic processes, intensifies foreign influence operations, and poses risks to consumer safety and citizens’ online rights.

The 2023 European Commission country reports highlight significant challenges in cyber resilience and cybersecurity across the Western Balkans. Albania has taken steps to enhance its framework, appointing a National Coordinator for Cybersecurity and establishing a Cybersecurity Operations Center. Bosnia and Herzegovina (BiH) faces significant gaps, lacking a comprehensive legislative framework and a country-wide strategy. Montenegro has addressed some legislative gaps, creating a Directorate for Information Security after a 2022 cyber-attack. Kosovo made progress with the recent approval of the cybersecurity law but needs to develop operational mechanisms and technical capacities.

According to the European Commission’s country reports for 2023, the status of Chapter 10 on Digital Transformation and Media in the Western Balkans, encompassing regulations for the internal market in electronic communications, electronic commerce, audiovisual services, and consumer protection for modern service accessibility, indicates an overall readiness level ranging from some preparation to moderate preparation. Notably, Bosnia and Herzegovina is identified as the sole country at an early stage of preparation, showing no progress in 2023. Kosovo has some level of preparation, while the remaining Western Balkan nations share a moderate level of preparedness. The region, having been a target of substantial cyberattacks, has prompted governments to take tangible measures to enhance their cybersecurity.

12 European Commission, Serbia 2023 Report, SWD(2023) 695 final, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_695\\_Serbia.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_695_Serbia.pdf), (accessed January 2024)

13 Stefan Vladisavljev, “How Did China Become the Largest Investor in Serbia?,” China Observers in Central and Eastern Europe (CHOICE), August 8, 2023, <https://chinaobservers.eu/how-did-china-become-the-largest-investor-in-serbia/> (accessed January 2024); Valbona Zeneli, “Dancing in the Dark: The West, China and Russia in the Western Balkans,” Per Concordiam, [https://www.marshallcenter.org/sites/default/files/files/2020-10/pC\\_V10N3\\_en-4\\_Zeneli.pdf](https://www.marshallcenter.org/sites/default/files/files/2020-10/pC_V10N3_en-4_Zeneli.pdf) (accessed January 2024).

14 International and Security Affairs Centre (ISAC), Cybersecurity Ecosystem Report. Western Balkans: Emerging Cyber threats, Pricewaterhouse Coopers, March 2022, [www.isac-fund.org/wp-content/uploads/2022/04/PwC-Cybersecurity-Ecosystem-Report-WB.pdf](http://www.isac-fund.org/wp-content/uploads/2022/04/PwC-Cybersecurity-Ecosystem-Report-WB.pdf) (accessed November 5, 2023).

15 Darko Brkan and Tijana Cvjetićanin, Key Recommendations of the Thematic Working Group on Digitalization and Connectivity, Civil Society Forum Tirana 2023, <https://wb-csf.eu/publications-csf/key-recommendations-of-the-thematic-working-group-on-digitalization-and-connectivity> (accessed November 5, 2023).



**Table 1: How the Western Balkans are Faring in Digital Transformation According to the 2023 Country Reports by the European Commission<sup>16</sup>**

Country	Level of Preparedness	Progress in 2023	Rating <sup>17</sup>
Albania	Moderately prepared	Good progress	3
Bosnia and Herzegovina	Early stage of preparations	No progress	1
Montenegro	Moderately prepared	Limited progress	3
Kosovo	Some level of preparation	Limited progress	2
North Macedonia	Moderately prepared	Limited progress	3
Serbia	Moderately prepared	Limited progress	3
<b>Average for the region</b>			2.5

The Cybersecurity Ecosystem Report by the International and Security Affairs Centre (ISAC) provides insights into the cybersecurity threats faced by Western Balkan economies.<sup>18</sup> It reveals that these threats align with global patterns, affecting various sectors, including the overall economy, defense, and public institutions, and services. The predominant cyber threats involve cybercrime, with malware, phishing, ransomware, and Distributed Denial of Service (DDoS) attacks being common. The report identifies key risks in governance, technical aspects, capacity, and awareness. Governance challenges include incomplete national cybersecurity frameworks and overlapping jurisdictions. Technical vulnerabilities arise from outdated systems, especially in the public sector and critical infrastructure.

Cyberattacks in the Western Balkans have been perpetrated by both state and non-state actors. In

September 2022, the Albanian Prime Minister, Edi Rama, attributed damaging hacks of the country's critical digital infrastructure to the Islamic Republic of Iran (IRI), leading to the termination of diplomatic relations with Teheran.<sup>19</sup> Similarly, Montenegro, in the same month, attributed cyberattacks on its government digital infrastructure to a criminal group named Cuba ransomware, which the National Security Agency (ANB) linked to Russia.<sup>20</sup> In April 2020, Kosovo's Economic Bank experienced a significant cyberattack resulting in the publication of private customer data. In 2022, media organizations faced cyberattacks, leading to the deletion of articles, data loss, and compromised access to official email addresses and internal systems for nearly two months.

A database compiled by the Balkan Investigative Reporting Network (BIRN) documents 40 cases of significant cyberattacks targeting the Balkan region's Biometrics and Digital Identity (BDI) systems.<sup>21</sup> These attacks primarily targeted the public sector, banks, and individual citizens. Perpetrators exploited vulnerabilities in the digital infrastructure and security measures of both private and public entities.

Another widespread problem in the region is organized cyber violence. The Western Balkans Cybersecurity Research Network, comprising civil society organizations across the region, released a report in March 2023 on "Cybersecurity and Human Rights."<sup>22</sup> The report highlights the prevalence of organized cyber violence in the Western Balkans, posing a significant threat to individuals' rights and democratic participation. This form of online violence has adverse effects on freedom of expression, the right to information, and freedom of

16 European Commission, Enlargement Package, Country Reports for the Countries of the Western Balkans, [https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports\\_en](https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en) (accessed November 5, 2023).  
 17 Based on the assessment of the European Commission on the level of preparedness of the respective countries: 1: Early stage of preparation; 2: Some level of preparation; 3: Moderately prepared; 4: Good level of preparation; and 5: Very advanced stage of preparation.  
 18 International and Security Affairs Centre (ISAC), March 2022.  
 19 Fjori Sinoruka and Perparim Isufi, "Albania Freezes Diplomatic Ties with Iran Over Cyber-Attacks," *Balkan Insight*, September 7, 2022, <https://balkaninsight.com/2022/09/07/albania-freezes-diplomatic-ties-with-iran-over-cyber-attacks/> (accessed February 18, 2024).  
 20 Daria Sito-Sucic, "Montenegro Blames Criminal Gang for Cyber Attacks on Government," in: *Reuters*, September 1, 2022, <https://www.reuters.com/world/europe/montenegro-blames-criminal-gang-cyber-attacks-government-2022-08-31/> (accessed January 2024).  
 21 BIRN, "Battle for Balkan Cybersecurity: Threats and Implications of Biometrics and Digital Identity," in: *Balkan Insight*, June 30, 2023, <https://balkaninsight.com/2023/06/30/battle-for-balkan-cybersecurity-threats-and-implications-of-biometrics-and-digital-identity/> (accessed December 8, 2023).  
 22 DCAF, *Cybersecurity and Human Rights in the Western Balkans: Mapping Governance and Actors*, October 5, 2022 <https://www.dcaf.ch/index.php/cybersecurity-and-human-rights-western-balkans-mapping-governance-and-actors> (accessed December 8, 2023).

assembly. Individuals are targeted online to silence and discourage them from participating politically, socially, or culturally, both online and offline. The report emphasizes the concerning trend of governments, even those deemed democratic and respectful of human rights, being tempted by the increased availability of technologies that enable widespread monitoring of people at any time and place.

It is important to note that assigning blame for cyberattacks is very complex because the inherent design of the internet allows malicious actors to obscure their identity effectively. The challenge of attributing cyber actions to states has been persistent within cybersecurity circles. The internet's inherent anonymity, while generally seen as a positive feature, also complicates the attribution process. Previous research has primarily dealt with the technological hurdles in identifying the sources of cyberattacks, but there is a growing argument that this issue might be better addressed through legal frameworks rather than relying on technology alone.<sup>23</sup> Common views have held that cyber attribution is a matter of technological investigation, focusing narrowly on whether it is possible to link an attack to specific source using digital forensic techniques.<sup>24</sup>

The European Commission's annual reports indicate that the level of cyber preparedness across the Western Balkans is uneven. While countries like Albania, Serbia, and Montenegro have made commendable progress in enhancing their cybersecurity frameworks, others, notably Kosovo and Bosnia and Herzegovina, are significantly lagging behind. This disparity highlights a critical need for more uniform progress across the region.

A major hindrance to building effective cyber resilience in the Western Balkans is the slow pace of the European Union in integrating the region into its cybersecurity framework. Despite explicit political commitments to include the Western Balkans in the EU's Digital Single Market, particularly in areas

like e-commerce and cybersecurity, the realization of these commitments has been sluggish.<sup>25</sup>

Efforts such as the establishment of the Western Balkans Cyber Capacity Center (WB3C) in Podgorica, Montenegro, spearheaded by France and Slovenia, demonstrate a proactive approach to addressing these challenges. However, unresolved bilateral disputes, particularly between Kosovo and Serbia, pose a significant threat to broader regional integration and cooperation. In the context of cybersecurity, where regional collaboration is vital, these ongoing tensions risk undermining the effectiveness of collective security measures.

Although Western Balkan nations are making progress towards enhancing their cybersecurity capabilities, progress is hindered by regional dynamics and sluggish European integration process. Strengthening the region's cybersecurity requires focusing more on capacity development, improving regional cybersecurity cooperation, resolving bilateral disputes which often undermine greater regional cooperation, and expediting alignment with EU standards.

### Assessing Cyber Readiness and Identifying Vulnerabilities: Analysis of the WB6

The 2023 country reports by the European Commission show that each Western Balkan country continues to face significant challenges in developing cyber resilience and strengthening cybersecurity.

In response to significant cyberattacks in July and September 2022, *Albania* has taken substantial steps to enhance its cybersecurity framework. Initiatives include appointing a National Coordinator for Cybersecurity, establishing a government Cybersecurity Operations Center, and developing a new law on cybersecurity, aligning with the Network and Information Systems directive (NIS2). The list of critical information infrastructures has expanded, covering sectors such as government,

23 Delbert Tran, "The Law of Attribution: Rules for Attributing the Source of a Cyber-Attack", *The Yale Journal of Law & Technology*, vol. 20, <https://openyls.law.yale.edu/bitstream/handle/20.500.13051/7830/DelbertTranTheLawofAttrib.pdf?sequence=2> (accessed February 15, 2024).

24 Ibid.

25 The European Commission, "Second Regulatory Dialogue between the EU and the Western Balkans," June 27, 2023, <https://digital-strategy.ec.europa.eu/en/news/second-regulatory-dialogue-between-eu-and-western-balkans> (accessed February 15, 2024)

energy, health, finance, transport, digital, and water. Despite agreements on cybersecurity with Israel, Saudi Arabia, and the United Arab Emirates (UAE), authorities need to further strengthen capacities, promote awareness, and foster collaboration with the private sector and civil society. Albania also needs to improve statistical data collection on digital performance and competitiveness.<sup>26</sup>

*Bosnia and Herzegovina* faces significant gaps in cybersecurity, lacking a comprehensive legislative framework for the security of networks and information systems.<sup>27</sup> The Republika Srpska has a law on information security in place, but a country-wide strategy or legal framework is absent, and no progress has been made in this regard. The country also falls short in designating a country-wide single point of contact responsible for coordination and cross-border cooperation. Furthermore, there is a need for establishing a network of computer security incident response teams (CSIRT), with operational teams currently only present at the Ministry of Defense and in the Republika Srpska entity. These deficiencies highlight the imperative for Bosnia and Herzegovina to enhance its cybersecurity infrastructure and coordination mechanisms.

*Montenegro* faces legislative gaps in aligning with EU standards in electronic communications, 5G cybersecurity, e-privacy, and digital identity.<sup>28</sup> Montenegro experienced a massive cyberattack in August 2022, and as a result e-Government services decreased due to internal reorganizing after the attack.<sup>29</sup> While strides have been made in cybersecurity and digital education, Montenegro needs to intensify efforts for legislative alignment, cyber resilience, and e-Government service restoration, according to the assessment by the European Commission.<sup>30</sup>

*Kosovo* has made progress with the adoption of legislation on cybersecurity.<sup>31</sup> Efforts are needed to finalize the related strategy and action plan. Basic capabilities in cybersecurity exist, but operational mechanisms, technical capacities, and human resources require development. The operational e-Government portal offers over 150 fully digitalized services, but Kosovo needs to finalize and adopt its e-Government strategy and align with the EU acquis on open data.

The Kosovo and Serbia economic normalization agreement, commonly referred to as the Washington Agreement, was signed on September 4, 2020, at the White House by then-Prime Minister of Kosovo Avdullah Hoti and the President of Serbia Aleksandar Vučić in the presence of then President of the United States Donald Trump.<sup>32</sup> As part of the Washington Agreement, Kosovo committed to the U.S.-led Clean Network initiative, pledging to remove 5G equipment provided by what is deemed as “untrusted vendors” – which is a reference to China – from its mobile networks. Additionally, Kosovo committed to prohibiting these vendors from participating in any future projects in its market.

*North Macedonia* has expanded its 5G signal and implemented activities outlined in its national cybersecurity strategy for 2018 until 2022.<sup>33</sup> However, better coordination and inter-institutional cooperation are needed. Adoption of the national cybersecurity strategy for 2023 until 2027 is pending, along with strengthening cyber capacity in state institutions. Legislation alignment with NIS and NIS2 Directives is crucial as well as ensuring the regulators’ full independence.

26 The European Commission, Albania 2023 Report.

27 European Commission, Bosnia and Herzegovina 2023 Report, SWD(2023) 691 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_691%20Bosnia%20and%20Herzegovina%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_691%20Bosnia%20and%20Herzegovina%20report.pdf) (accessed January, 2024).

28 European Commission, Montenegro 2023 Report, SWD(2023) 694 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_694%20Montenegro%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_694%20Montenegro%20report.pdf) (accessed January 2024).

29 Samir Kajosevic, “Montenegro Still Assessing Damage From Mystery Cyber Attacks,” in: Balkan Insight, August 29, 2022, <https://balkaninsight.com/2022/08/29/montenegro-still-assessing-damage-from-mystery-cyber-attacks/> (accessed January 2024).

30 Ibid.

31 European Commission, Kosovo 2023 Report, SWD(2023) 692 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_692%20Kosovo%20report\\_0.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_692%20Kosovo%20report_0.pdf) (accessed January 2024).

32 Vivian Salama, “Serbia and Kosovo Sign Economic normalization agreement in Oval Office ceremony,” in: CNN, September 4, 2020, <https://edition.cnn.com/2020/09/04/politics/serbia-kosovo-agreement/index.html> (accessed January 2024).

33 European Commission, North Macedonia 2023 Report, SWD(2023) 693 final, November 8, 2023, [https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_693%20North%20Macedonia%20report.pdf](https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_693%20North%20Macedonia%20report.pdf) (accessed January 2024).

*Serbia* is considered by the European Commission to have a relevant legal framework concerning cybersecurity and operates a functional national computer emergency response team (CERTs).<sup>34</sup> However, there is a need to enhance and upgrade capacities. Also, Serbia needs to further progress in aligning legislation with the EU *acquis* on cybersecurity, particularly focusing on compliance with the NIS2 directive.<sup>35</sup> A crucial next step for Serbia is to sign and implement the memorandum of understanding on a 5G roadmap for digital transformation, ensuring alignment with the EU's risk mitigation measures for 5G network security.<sup>36</sup>

Serbia has aligned with the Framework for a Joint EU Diplomatic Response to Malicious Cyber Activities, which enables Serbia to employ all Common Foreign and Security Policy (CFSP) measures to prevent and respond to malicious cyber activities against the EU and its member states. However, Serbia has not aligned with specific restrictive measures when the identified perpetrators of malicious cyber activities have been of Russian or Chinese origin.<sup>37</sup>

Serbia follows a so-called “Four Pillar Foreign Policy,” which promotes close cooperation simultaneously with the European Union (EU), United States, Russia, and China.<sup>38</sup> This multi-vector policy has placed Serbia at odds with the EU and the United States on many occasions and will continue to present an issue as the country progresses toward membership in the EU.<sup>39</sup>

Overall, the cybersecurity landscape in the Western Balkans is marked by a significant divergence in national strategies and capabilities, which, coupled with

weak regional cooperation, adds to the region's complexities in dealing with cybersecurity and building cyber resilience. While countries like Albania and Montenegro demonstrate a proactive approach in aligning with EU cybersecurity directives, others, such as Bosnia and Herzegovina and Kosovo, struggle with foundational legislative frameworks, indicating a pressing need for comprehensive regional cooperation and harmonization in cybersecurity policies.

### Case Study: Chinese Influence in Serbia

As mentioned above, Chinese influence in the WB region is particularly visible with regard to Serbia. Therefore, in the following a closer look is cast on this relationship.

For example, China has tried to influence the cyber domain in the Western Balkans, focusing on people, is the so-called “Seeds for the Future” program, which supports the academic sector through its corporate social responsibility program, involving Bosnia and Herzegovina, North Macedonia, and Serbia.<sup>40</sup> Launched in 2020, the program aims to equip young IT leaders with skills and knowledge in areas such as 5G solutions, cybersecurity, and artificial intelligence (AI), and provides insights into Chinese culture. Annually, ten students are selected to participate, marking Huawei's continuous investment in the country's IT education since at least 2011, when scholarship programs were initiated for students across various universities in Bosnia and Herzegovina.<sup>41</sup>

Huawei has played a prominent role in fostering Chinese-Serbian cooperation with respect to cyber

34 European Commission, *Serbia 2023 Report*, 2023.

35 *Ibid.*

36 *Ibid.*

37 International and Security Affairs Centre (ISAC), 2022.

38 Christopher Hartwell, Katarzyna Sidlo, *Serbia's Cooperation with China, the European Union, Russia and the United States of America*, European Parliament, Policy Department, November 21, 2017, [https://www.europarl.europa.eu/RegData/etudes/STUD/2017/603854/EXPO\\_STU\(2017\)603854\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2017/603854/EXPO_STU(2017)603854_EN.pdf) (accessed January 2024).

39 Wouter Zweers, Niels Drost, and Baptiste Henry, “Little Substance, Considerable Impact: Russian Influence in Serbia, Bosnia and Herzegovina, and Montenegro”, Clingendael Report, August 2023, <https://www.clingendael.org/sites/default/files/2023-08/little-substance-considerable-impact.pdf> (accessed February 14, 2024); CEAS Research Team, “Security Relations between Serbia and China – Challenges or Benefits?”, Center for Euro-Atlantic Studies <https://vilniusinstitute.lt/wp-content/uploads/2020/02/SECURITY-RELATIONS-BETWEEN-SERBIA-AND-CHINA.pdf> (accessed February 14, 2024); Natalija Jovanovic, “How Serbia Became Blanketed in Chinese-Made Surveillance Cameras”, in: *Radio Free Europe*, July 30, 2023, <https://www.rferl.org/a/serbia-surveillance-cameras-china/32526515.html> (accessed February 14, 2024).

40 BIRN, *China in the Western Balkans*, December, 2020, <https://balkaninsight.com/wp-content/uploads/2020/12/China-in-the-Western-Balkans-December-2020-klajsiows093oi12302344.pdf> (accessed January 2024).

41 International and Security Affairs Centre (ISAC), *Cybersecurity Ecosystem Report. Western Balkans: Emerging Cyber threats*, March 2022, <https://www.isac-fund.org/wp-content/uploads/2022/04/PwC-Cybersecurity-Ecosystem-Report-WB.pdf> (accessed January 2024).



domains under the Digital Silk Road initiative.<sup>42</sup> According to the “Cybersecurity Ecosystem Report” by ISAC, as early as 2011, Serbia’s Ministry of Internal Affairs initiated cooperation with Huawei for the purpose of improving the telecommunications system. Subsequently, in 2016, Telekom Srbija and Huawei embarked on a fixed network transformation project valued at approximately 150 million EUR.<sup>43</sup> The partnership continued in 2017 with the signing of a memorandum of understanding between Serbia and China, focusing on strengthening the Information Silk Road for Information Connectivity.

Belgrade also hosted the Information Silk Road for Information Connectivity Summit that same year.<sup>44</sup> In 2020, Huawei and Serbia’s Office for Information Technologies and e-Government formalized an agreement enabling Huawei to utilize the capacity of Serbia’s state-owned data center in Kragujevac. According to the agreement, Huawei will deploy its high-performance computer systems and artificial intelligence software platform at the facility<sup>45</sup>.

The Serbian government had plans to cooperate with Huawei on 5G equipment, however, due to the 2020 Washington Agreement between Kosovo and Serbia on the economic normalization of relations, Serbia committed itself to refrain from engaging with “untrusted vendors,” which largely refers to Huawei China, on 5G equipment. This commitment arose as a result of cooperation with the United States government. Serbian civil-society organizations and the EU strongly opposed the Serbian government’s plans to install around 9,000 cameras in Belgrade under the Smart and Safe City project, part of the cooperation agreement with China. This opposition led to the

withdrawal of the Draft Law on Internal Affairs by the government in September 2021.<sup>46</sup>

Civil society in Serbia has raised serious concerns about the use of spyware against government critics and the installation of Chinese smart surveillance cameras as part of a broader strategy to control dissent and intimidate opposition.<sup>47</sup> According to Maja Bjeloš from the Belgrade Centre for Security Policy, the government’s justification for such surveillance is framed as combatting foreign influence, which she argues further raises concerns about privacy and civil liberties.<sup>48</sup>

Besides Serbia, Huawei plays a significant role in Bosnia and Herzegovina’s infrastructural and telecommunications sectors. The Ministry of Communications and Transport in Bosnia and Herzegovina entered into an agreement with Huawei, focusing on technical support for the country’s smart-city and ‘safe-city projects. Most telecom companies in the region, including BiH Telekom, Telekom Srbije, etc., cooperate with Huawei and are considering it as a potential partner for future 5G network implementation.

### Examining Efforts at Building Cyber Resilience in the Western Balkans

Central to EU-WB6 cooperation on cyber security and to developing cyber resilience is the potential for all WB6 to become part of the European Union Agency for Cybersecurity (ENISA). Concerning some support for a phasing-in approach toward the Western Balkans, in the framework of the enlargement policy, this marks an important opportunity to bring the region closer to the EU and help shape cy-

42 Stefan Vladislavljev, Chinese Influence in Serbia, The Center for European Policy Analysis (CEPA), September 2, 2022, <https://cepa.org/comprehensive-reports/chinese-influence-in-serbia/> (accessed December 8, 2023).

43 Xinhua, Huawei Starts Three-year Fixed Network Transformation in Serbia, October 6, 2016, <http://en.people.cn/n3/2016/1006/c90000-9123224.html> (accessed January 2024).

44 Stefan Vladislavljev, China’s ‘Digital Silk Road’ Enters the Western Balkans, CHOICE, June 2021, [https://chinaobservers.eu/wp-content/uploads/2021/06/CHOICE\\_policy-paper\\_digital-silk-road\\_A4\\_web\\_04.pdf](https://chinaobservers.eu/wp-content/uploads/2021/06/CHOICE_policy-paper_digital-silk-road_A4_web_04.pdf) (accessed January 2024).

45 Aleksandar Vasovic, “Serbia Chooses Links with China to Develop Economy, Telecoms despite U.S. warning campaign,” in: Reuters, August 13, 2020, <https://www.reuters.com/article/idUSKCN2592AN/> (accessed February 15, 2024); Huawei, “Huawei Signed an Agreement with Serbia’s Office for Information Technologies and eGovernment,” December 11, 2020, <https://e.huawei.com/cz/news/ebg/2020/serbia-office-egovernment-agreement> (accessed February 15, 2024).

46 Radovan Balać, Withdrawal of the Draft Law on Internal Affairs in Serbia: The Prime Minister’s Gambit, European Western Balkans, December 31, 2022, <https://europeanwesternbalkans.com/2022/12/31/withdrawal-of-the-draft-law-on-internal-affairs-in-serbia-the-prime-ministers-gambit/> (accessed January, 2024).

47 Maja Bjelos, Pro-Democracy Forces in Serbia Targeted with Spyware, Balkan Insight, December 8, 2023, <https://balkaninsight.com/2023/12/08/pro-democracy-forces-in-serbia-targeted-with-spyware/> (accessed January, 2024).

48 Ibid.



ber resilience. Integration of the WB6 countries into ENISA and the EU Cybersecurity Incident Review Mechanism was one of the central recommendations endorsed by leaders from the thematic working group on geopolitics and security at the Berlin Process Summit in Tirana in October 2023.

The Digital Agenda for the Western Balkans, a joint effort between the six Western Balkan countries and the European Commission, was introduced on February 6, 2018, and represents a major framework for cooperation between the European Union and the WB region in the cyber domain. The Digital Agenda for the Western Balkans has four key objectives: investing in broadband connectivity, increasing cybersecurity, trust, and the digitalization of industry, strengthening the digital economy and society, and boosting research and innovation.

During the Berlin Process summit in Tirana on October 16, 2023, representatives of the governments of France, Montenegro, and Slovenia signed a treaty granting the Western Balkans Cyber Capacity Centre (WB3C) the status of an international organization. The WB3C will be a capacity-building and training center in the fields of cybercrime, cybersecurity, and cyber diplomacy. The establishment of WB3C, set to be finalized by 2025 pending ratification by founding states, aims to advance cyber capacity-building in the region. The center will focus on training activities related to cybersecurity and the fight against cybercrime, fostering cooperation among countries of the region. The governance structure of WB3C will include participation from countries of the Western Balkans, along with European and international partners interested in contributing to cyber capacity-building efforts.

In the framework of the Instrument of Pre-Accession Assistance (IPA II), the European Commission is providing important support to build cyber resilience in the Western Balkans. For instance, the “EU Support to Western Balkans Cybersecurity Capacity Building” is a three-year project, current-

ly ongoing. The overarching objective is to strengthen the cyber resilience of Western Balkan IPA III beneficiaries, aligning them with EU standards and best practices. The specific goal is to enhance the prevention, preparedness, and response capabilities of pertinent public and private entities across the Western Balkans. The project is structured into four integral components: cybersecurity governance and awareness, legal framework, cyber norms, and international law, risk and crisis management, and operational capacities.

Another important project that works to strengthen cyber resilience is the Council of Europe’s iPROCEEDS-2. This project seeks to develop capacities in IPA beneficiary countries to search, seize, and confiscate cybercrime proceeds and prevent online money laundering. Most WB countries are signatories to the Council of Europe (CoE) Budapest Convention on Cybercrime, which further adds to the important mechanisms that can shape cyber resilience.

The EU’s promotion of public-private partnerships (PPPs) in the Western Balkans aligns with the Regional Cooperation Council’s emphasis on a collective approach toward cybersecurity, in line with EU standards. However, the critique questions the practicality of these models in a region where political commitment varies and where there is a shortage of IT and cybersecurity specialists.<sup>49</sup>

The EU’s efforts in capacity building and resource allocation face challenges due to the varying maturity levels and capacities of cybersecurity entities across different political institutions in the Western Balkans. It is not clear whether the EU’s efforts are sufficiently tailored to address these disparities and effectively build local cybersecurity capacities.<sup>50</sup>

### Promoting Cyber Resilience through Regional Cooperation

Cybersecurity threats transcend national borders, making a joint regional approach crucial. The West-

49 Stiftung Neue Verantwortung, A Platform for Sustainable Cybersecurity Cooperation in the Western Balkans, December 2023, [https://www.stiftung-nv.de/sites/default/files/snv\\_platform\\_for\\_sustainable\\_cybersecurity\\_cooperation\\_in\\_western\\_balkans.pdf](https://www.stiftung-nv.de/sites/default/files/snv_platform_for_sustainable_cybersecurity_cooperation_in_western_balkans.pdf) (accessed January, 2024).

50 Ibid.

ern Balkans face common cyber challenges, and therefore cooperation allows for a unified defense against cyber threats that often exploit regional interconnectedness. The economic stakes are high, with cybercrime predicted to cause global damages of eight trillion U.S. dollars in 2023.<sup>51</sup>

The Western Balkans, aspiring for greater integration with the EU, need robust cybersecurity measures to align with EU standards. A region more integrated in shared defenses against cyber threats becomes more attractive for investment, fostering economic growth.

Regional cooperation also enhances information sharing and knowledge exchange, critical components of effective cybersecurity and cyber resilience. By pooling resources, Western Balkan countries can collectively strengthen their cyber defenses, share best practices, and engage in capacity-building initiatives. This approach ensures that advancements in cybersecurity are disseminated uniformly across the region, fostering a more resilient digital ecosystem.

Western Balkan countries recognize the importance of regional cooperation to build cyber resilience. The upcoming Center for Cybersecurity Capacity Building presents an important opportunity for the region to advance cooperation in dealing with cyber threats. Regional cooperation is overwhelmingly supported by the citizens of the Western Balkans. According to the Regional Cooperation Council's (RCC) third edition of a public opinion survey on security issues "SecuriMeter," some 73 percent of citizens believe that deepening collaboration among Western Balkan countries is essential to managing security challenges.<sup>52</sup>

Data from the RCC's "SecuriMeter" highlight prevailing concerns regarding cybersecurity, disinformation, and the impact of social media. Almost half of the citizens believe that disinformation causes

harm, with social media identified as the primary platform for spreading fake news.

Countries in the Western Balkans are making some important steps towards building cyber resilience through a regional cooperation approach. Albania has established operational cooperation mechanisms with Kosovo and North Macedonia, but formalizing cooperation faces challenges due to differences in authorities hosting national Computer Emergency Response Teams (CERT). Bilateral cooperation channels have been established with Kosovo, North Macedonia, and Romania through memorandums of understanding.

Bosnia and Herzegovina has limited international agreements concerning cybersecurity, primarily focused on police cooperation and combating cybercrime. Agreements include countries such as the Czech Republic, Saudi Arabia, Ukraine, Croatia, and Turkiye.<sup>53</sup>

Kosovo maintains a strong regional partnership with Albania in cybersecurity, with standing cooperation in the field of ICT (Information and Communication Technology) and memorandums of understanding on cooperation between national CERTs. Bilateral regional cooperation varies in scope and intensity. Limited cooperation with Serbia is primarily focused on information exchange related to detected malicious activities.

Montenegro, as a North Atlantic Treaty Organization (NATO) member, has joined the alliance's Cooperative Cyber Defense Center of Excellence (CCDCOE) and the European Center of Excellence for Countering Hybrid Threats. Long-term ICT and cyber cooperation with the United States have been established under the NATO umbrella. Montenegro also cooperates with UAE for cybersecurity development. Operational cooperation with the national Computer Incident Response Team (CIRT.ME) is

51 Steve Morgan, Cybercrime to Cost the World 8 Trillion Annually in 2023, *Cybercrime Magazine*, October 17, 2022, <https://cybersecurityventures.com/cybercrime-to-cost-the-world-8-trillion-annually-in-2023/#:~:text=Our%20report%20provides%20a%20breakdown,%24154%20billion%20a%20Week> (accessed December 8, 2023).

52 RCC, 69 percent of Western Balkan citizens agree that what brings them together is more important than what separates them, *Regional Cooperation Council (RCC)*, July 18, 2023, <https://www.rcc.int/news/832/69-of-western-balkan-citizens-agree-that-what-brings-them-together-is-more-important-than-what-separates-them> (accessed December 8, 2023).

53 International and Security Affairs Centre (ISAC), *Cybersecurity Ecosystem Report*

in place, including information exchange with other CERTs in the region.<sup>54</sup>

Serbia is estimated to have around 30 international cooperation documents, covering various aspects of cyber-related cooperation. The national CERT in Serbia is an accredited member of Trusted Introducer and FIRST (Forum of Incident and Response Security Teams).<sup>55</sup> Serbia's cooperation with China and Russia is extensive. It is especially deep with China in cyber-related issues. Serbia has failed to align with the EU's foreign and security policy in general and, in particular, on concrete restrictive measures against malicious cyber activities originating from Russia and China.<sup>56</sup>

The Southeast Europe 2030 Strategy developed by the RCC, based on the mandate given by the Southeast European Cooperation Process (SEEC) leaders during the SEEC summit in 2019, prioritizes regional cyber resilience.<sup>57</sup> One of the actions in the strategy emphasizes the need to enhance cybersecurity, adjust regulatory frameworks to address emerging digital security risks, and build capacities as a prerequisite for the deployment of new technologies and services relying on innovative technical solutions. Capacity-building efforts include raising awareness about cybercrime and related offenses.

To build societal and cyber resilience also requires addressing the rampant disinformation environment in the WB6 (see also the article on disinformation in this edited volume). Important prerequisites are better-informed citizens with access to the internet, digital security training, and credible information. The countries in the Western Balkans, but also civil society organizations, have made important efforts to counter disinformation and promote cyber resilience. For instance, ministers and senior officials from Western Balkan countries convened for the second Regulatory Dialogue with the European Commission in June 2023, a crucial plat-

form for digital policy consultation. During the event, Albania, Montenegro, North Macedonia, and Serbia signed association agreements for access to the Digital Europe Programme. Kosovo and Bosnia and Herzegovina were left out. The dialogue covered key digital policy issues, including data governance and the free flow of data, improvements in e-Services and regional interoperability, the development of digital identity and trust services, and enhanced cooperation on cybersecurity. Participating countries emphasized the need for alignment with EU standards and regulations, such as the Open Data Directive, the regulation framework on the free flow of non-personal data, and the European Data Governance Act. Additionally, discussions focused on advancing e-Services, promoting interoperability, and ensuring the mutual recognition of electronic signatures. Cybersecurity cooperation was a central theme, with a focus on preventing, detecting, and responding effectively to cyber threats. The status of adapting the EU's NIS directive and the 5G cybersecurity toolbox was also addressed. It is important for civil-society organizations from the Western Balkans to monitor these meetings, to increase the transparency and accountability of this platform – especially vis-à-vis countries of the Western Balkans – to deliver on their respective commitments.

The EU's initiatives, while well-intentioned, must navigate the unique political and economic landscapes of each Western Balkan economy, including diverse legal and strategic frameworks. Often EU initiatives are not sufficiently adaptable to these unique environments to ensure effective cybersecurity cooperation.

The proposed Platform for Sustainable Cybersecurity Cooperation by Stiftung Neue Verantwortung (SNV) aims to provide practical support and foster efficient regional cooperation. However, challenges such as different maturity levels of political institu-

54 Ibid.

55 CERT, National CERT becomes member of FIRST, February 21, 2020, <https://www.cert.rs/en/vest/430-Nacionalni+CERT+%C4%8Dlan+FIRST-a.html> (accessed December 8, 2023).

56 Stefan Vladislavljev, "Why Serbia Refuses to Stick to the EU's Line on China," CHOICE, October 19, 2023, <https://chinaobservers.eu/why-serbia-refuses-to-stick-to-the-eus-line-on-china/> (accessed February 15, 2024).

57 Southeast Europe 2030 Strategy, <https://www.rcc.int/pages/148/south-east-europe-see2030-strategy#:~:text=The%20SEE%202030%20Strategy%20is,People> (accessed February 18, 2024)

tions and the need for better integration of multiple stakeholders present an obstacle.<sup>58</sup>

While the EU's approach with respect to cyber security is designed to be inclusive, it has often failed to include all stakeholders, and bilateral disputes in the Western Balkans, especially between Kosovo and Serbia, often undermine greater integration and cooperation in the region. When it comes to cooperation, another challenge is how to integrate diverse stakeholders from the private sector and civil society in promoting cyber resilience.

The European Union's approach towards integrating the Western Balkans into the Digital Single Market, particularly in cybersecurity, has been sluggish. This is inconsistent with the European Commission's aspirations for the region's digital integration. There is a lack of a clear pathway for the region's integration or phase-in in the European Union Agency for Cybersecurity (ENISA) as well as cyber incident review mechanism, which would greatly benefit cyber resilience in the Western Balkans. The exclusion of Kosovo and Bosnia and Herzegovina from the Digital Europe Programme, which offers substantial resources for digital development, is a critical oversight. It is essential for the EU to promptly extend membership to these countries since the rest of the region has already signed association agreements in June of 2023.

Furthermore, greater support for civil society in the Western Balkans, ensuring adherence to European digital principles, and promoting governmental accountability is important.

## Conclusion and Recommendations

States and non-state actors are employing several strategies to engage in the Western Balkans, concentrating on people, procedures, and technology in the field of cybersecurity, according to the Metamorphosis study. In the areas of people and processes, Western Balkan countries prioritize building capacity and providing support through institutional activities, workshops, training, and strategic frameworks.

In terms of bilateral cooperation and international organizations, support for cybersecurity activities is greatly aided by the European Union, United States, and the United Kingdom, as well as international and regional organizations like the Regional Cooperation Council (RCC).

The region grapples with regulatory challenges, making it difficult to combat illegal online content. The absence of protective mechanisms for digital service users and consumers, along with a lack of platform accountability, exacerbates the cybersecurity landscape.

Based on these considerations, this paper makes the following recommendations:

### To the European Union (EU):

- The EU should expedite the integration of Western Balkan countries into the Digital Single Market and include them in the European Union Agency for Cybersecurity (ENISA) and the EU Cybersecurity Incident Review Mechanism.
- The EU needs to invite, without delay, Bosnia and Herzegovina and Kosovo to join the Digital Europe Programme.
- The European Commission should assess the allegations from civil society that governments in the region are using information technology to spy on government critics, mainly targeting civil society.

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<sup>58</sup> Ibid.

**To the Western Balkan Governments:**

- Governments must strengthen their cybersecurity frameworks, focusing on regulatory measures against cyber threats and illegal online content. They should invest in cybersecurity infrastructure, awareness programs, and cooperation with the private sector. Additionally, enhancing civic education, media literacy, and critical thinking skills, especially among youth, is vital.
- Regional cooperation is vital for developing cyber resilience, and therefore governments in the region should support initiatives aiming to improve information sharing and cooperation on cybersecurity at the regional level.

**To the Civil Society in Western Balkans and EU:**

- Through a collaborative effort, civil society organizations from the region in cooperation with civil society organizations from the EU should develop a comprehensive assessment of the state of play in the Western Balkans concerning adherence to the declaration on European digital rights and principles and the Berlin Declaration on Digital Society and Value-based Digital Government.
- Civil society organizations from the Western Balkans and the EU should be invited as observers in the Regulatory Dialogue between the EU and the Western Balkans.



## List of Abbreviations

ADN-Balkans	Anti-Disinformation Network for the Balkans
AI	Artificial Intelligence
IT	Information Technology
ALB	Albania
AMA	Audiovisual Media Authority (Albania)
ANB	National Security Agency (Montenegro)
BDI	Biometrics and Digital Identity
BHRT	Radio Television Bosnia and Herzegovina
BIH	Bosnia and Herzegovina
BIRN	Balkan Investigative Reporting Network
CCDCOE	NATO'S Cooperative Cyber Defense Center of Excellence
CCE	Centre for Civic Education
CEP	Centre of European Perspective (Slovenia)
CERT	Computer Emergency Response Team
CFSP	Common Foreign and Security Policy
CIRT.ME	Montenegro's Computer Incident Response Team
CoE	Council of Europe
CoP	Code of Practice
COVID-19	Coronavirus Disease 2019
CRA	Communications Regulatory Agency Bosnia and Herzegovina
CSIRT	Computer Security Incident Response Teams
CSO	Civil Society Organization
DDoS	Distributed Denial of Service
DEAP	Digital Education Action Plan
DESI	Digital Economy and Society Index
DK	Don't Know
DMA	Digital Markets Act
DSA	Digital Services Act
EBU	European Broadcasting Union
EC	European Commission
EEAS	European External Action Service
EFCSN	European Fact-Checking Standards Network
EIB	European Investment Bank
eID	Electronic Identification Number
EIP	Economic and Investment Plan for the Western Balkans
ENISA	European Union Agency for Cybersecurity
ERGA	European Regulators Group for Audiovisual Media Services
EU	European Union

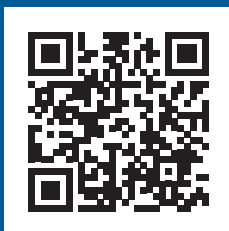
EUR	Euro Currency
FDI	Foreign Direct Investment
FIRST	Forum of Incident and Response Security Teams
GDP	Gross Domestic Product
ICT	Information and Communication Technology
IMC	Independent Media Commission (Kosovo)
INACH	International Network Against Cyber Hate
IoT	Internet of Things
IPA	Instrument for Pre-Accession Assistance
IRI	Islamic Republic of Iran
ISAC	International and Security Affairs Centre
JUFREX	Judicial Expertise on Freedom of Expression
JUFREX 2	EU/CoE Joint Programme Freedom of Expression and Freedom of the Media in South-East Europe
KCSS	Kosovar Centre for Security Studies
KOS	Kosovo
mbps	Megabits per second
MISA	Ministry of Information Society and Administration of North Macedonia
MKD	North Macedonia
MNE	Montenegro
MRT	Makedonska radio-televizija
NATO	North Atlantic Treaty Organization
NGO	Non Governmental Organization
NIS	Network and Information Security
NIS2 directive	Network and Information Systems Directive 2022/0383 of the EU Parliament
NRI	Network Readiness Index
OGP	Open Government Partnership
OECD	Organisation for Economic Co-operation and Development
OSCE	Organization for Security and Co-operation in Europe
PFC	Para-Fiscal Charges
PPP	Public-Privat Partnerships
PwC	PricewaterhouseCoopers GmbH
RCC	Regional Cooperation Council
REM	Serbian Regulatory Authority of Electronic Media
RS	Republika Srpska
RT	Russia Today
RTCG	Council of Radio Television of Montenegro
RTK	Radio and Television Kosovo
RTRS	Radio Television of Republika Srpska
RWB	Reporters Without Borders
SAP	Stabilization and Accession Process

SEE	Southeast Europe
SEECF	Southeast European Cooperation Process
SEENPM	South East European Network for Professionalization of Media
SLAPP	Strategic Lawsuit Against Public Participation
SME	Small and Medium-sized Enterprise
SNV	Stiftung Neue Verantwortung
SRB	Serbia
STRI	Digital Services Trade Restrictiveness Index
UAE	United Arab Emirates
UK	United Kingdom
VLOP	Very Large Online Platform
VLOSE	Very Large Online Search Engine
WB	Western Balkan
WB3C	Western Balkans Cyber Capacity Center
WB6	Western Balkan Six
WBADH	Western Balkans Anti-Disinformation Hub
WBIF	Western Balkan Investment Framework

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