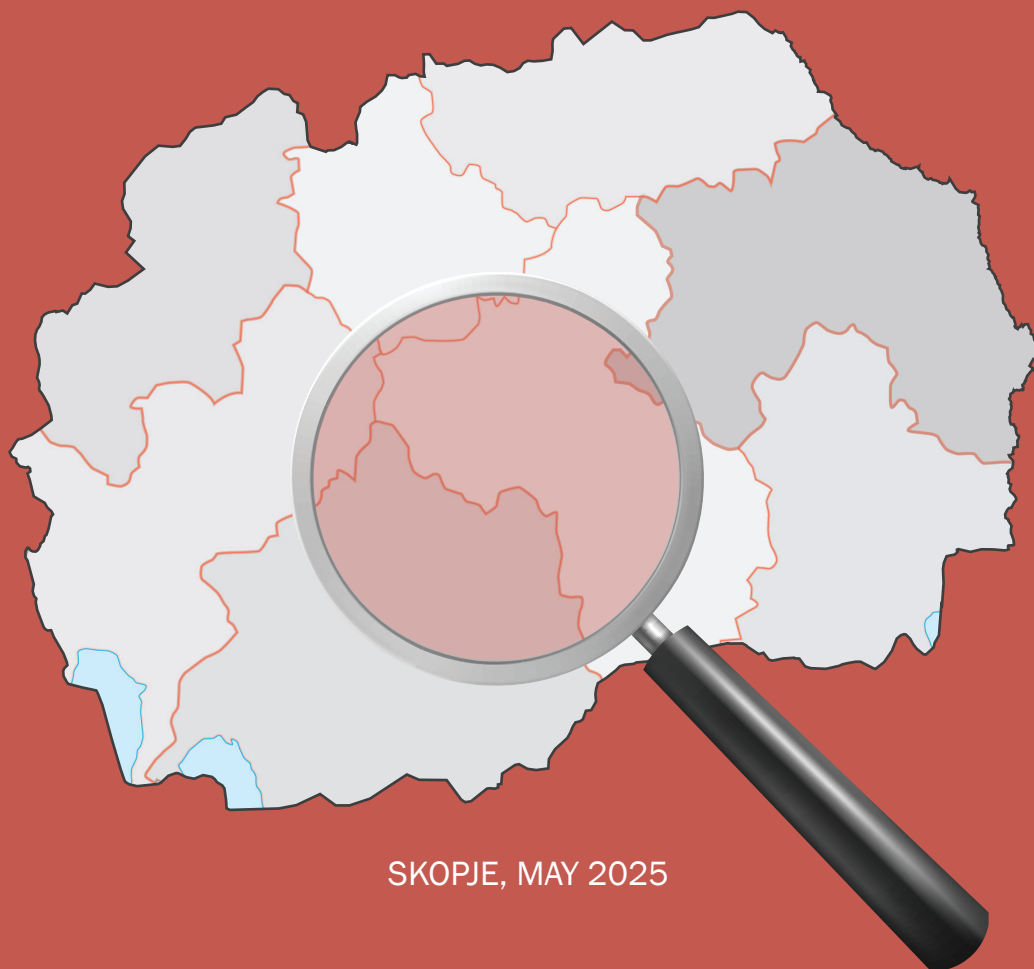


ANALYSIS

**TRANSPARENCY OF LOCAL
SELF-GOVERNMENT UNITS REGARDING PUBLIC
SPENDING ON MEDIA**



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INTRODUCTION

Transparent spending on media campaigns implies a safeguard for democracy, fair competition among media outlets, greater trust from the citizens, and minimising the opportunities for misuse. Where transparency is lacking, the risk of corruption, manipulation, and media clientelism increases significantly.

The risk of political influence on the media through state campaign financing is serious and real – especially in countries with weak institutions, insufficient media independence or insufficient transparency. Without clear rules, oversight and transparency, this practice can easily become a means of manipulation rather than informing.

Therefore, Article 102 of the Law on Audio and Audiovisual Media Services in North Macedonia has been the subject of significant legal and political debates over the past eight years. This article, first introduced in 2017, prohibited the use of public funds for advertising of state bodies, public enterprises, municipalities and other public institutions in private media. The goal was to prevent political influence on the media through the financing of campaigns that could undermine their independence and objectivity.

However, with the amendments to the law adopted on February 29, 2024, Article 102 was repealed. With this amendment, the option for state advertising in private media was reinstated.

Supporters of the repeal of Article 102, local and regional media outlets in particular, pointed out that the previous ban had forced them into a financial crisis, as they were unable to make business and technical cooperation agreements with public institutions. They believe that this amendment will now help them be financially sustainable and will increase the transparency of public institutions.

On the other hand, there is also criticism from journalist associations and experts, who warn of the risk of restoring political influence on the media. There are fears that without appropriate control and transparency mechanisms, this amendment could lead to the misuse of public funds and could undermine media independence.

The repeal of Article 102 opens up new opportunities for financial support of the media, but at the same time poses challenges in terms of preserving their independence and objectivity. It is important to establish appropriate mechanisms for control and transparency to ensure that public funds are used in the citizens' best interests, and not for political purposes.

In the context of these debates, the European Commission stressed that while it is important to support professional and investigative journalism, efforts should be made to protect the independence of the media from political interference. The EC recommends greater transparency regarding media advertising paid by political parties and public institutions.

The European Commission, Reporters Without Borders, and the OSCE regularly caution that the non-transparent allocation of public money in the media is a serious source of political influence. In press freedom indices, countries with such practices often rank lower.

The experiences of developed European countries with state advertising in the media vary significantly, but, in general, there are several common trends and best practices that are used to prevent political influence and misuse of public funds:

●	Clear criteria for state campaigns (public interest, not political promotion)
●	Funds allocated by an independent body, not by government offices
●	Budgets, contracts and media leases must be publicly available
●	Equitable access for all media based on measurable parameters (circulation, rating points, coverage)

Transparency of local government units is improving, but challenges remain.

Several institutions that measure the transparency of municipalities through multiple parameters show that, with each year, the municipalities are becoming more aware of the need to share public information with the public, but there is still significant room for improvement in that area.

According to the latest report by the Center for Economic Analysis (CEA) for the period 2023/2024, municipalities in North Macedonia are showing gradual improvement in budget transparency. Compared to the previous year, more than a third of municipalities have improved their budget transparency index.

According to another Active Transparency Index, published annually by the Center for Civic Communications, it is in the area of finances that municipalities publish the least information (67% out of 100%).

The general active transparency of municipalities according to this index for 2024 was 79%, showing an improvement of five percentage points compared to the previous year.

Transparency of public spending in North Macedonia, especially by local government units, is improving, but there is still significant room for improvement. Additional efforts are needed to ensure full, regular and easily accessible information for citizens, as well as active public involvement in decision-making processes.



WHAT IS MADE POSSIBLE WITH THE REMOVAL OF ARTICLE 102 FROM THE LAW ON AUDIO AND AUDIOVISUAL MEDIA SERVICES

After the Article was removed, the amendments allowed certain types of campaigns to be carried out, but under specific conditions.

Public interest campaigns, such as:

●	Public health – vaccination, disease prevention, healthy living
●	Public safety – traffic safety culture, fire protection, disasters
●	Education and informing (public service announcements) – enrolments, exams, curricula
●	Environment – recycling, energy efficiency, nature protection
●	Civil rights – elections, censuses, electronic services, inclusion of marginalized groups

With the legal amendments of 2024, the Government is obliged to implement at least one public interest campaign per year. The budget for this purpose must not exceed 0.1% of tax revenues in the state treasury.

In local self-government units, the Council of a municipality, as the highest decision-making body at the local level, has a key role in approving campaign funding – especially when the campaigns are implemented with public (budgetary) funds.

The procedure is not always regulated in detail in the Media Law, but rather relies on the principles of the Law on Local Self-Government, the Law on Public Procurement, and municipal statutes.

The campaign can be initiated by the mayor, a municipal commission, or municipal administration services.

The proposal must outline the objective of the campaign, i.e. it must be in the scope of the municipal jurisdiction, provide an explanation of why it is of public interest, establish the scope (where and how it will be implemented), and provide a budget with a detailed calculation.

The proposal is placed on the agenda of a Council session, it is reviewed in the budget and financing committees, and possibly in the public affairs or media committee.

Advisors have the right to request additional information, explanations or revisions to the proposal.

Funding is approved by a majority vote of the Council members present.

The decision must be recorded in the Meeting Minutes and published on the municipal website (according to the principles of transparency).

After the campaign is completed, a report on implementation is submitted to the Council, the effect of the campaign is assessed, and information on the money spent should be publicly available.

PROCEDURE FOR CONDUCTING THE ANALYSIS

Objectives and applied methodology for access to information

The purpose of the analysis was to determine whether, following the amendments to the Law on Media voted in the Parliament of the Republic of North Macedonia on February 29, 2024, municipalities publish advertisements and campaigns in private print, electronic and online media or make contracts with individuals (natural persons) to promote the activities of the municipality and the mayor. At the same time, the municipalities covered by the analysis were asked to submit all contracts made in the period from January 1, 2024 to April 30, 2025.

The requests for responses were sent in accordance with the Law on Free Access to Public Information, according to which the deadline for response is 20 days.

The municipalities included in the analysis were provided with a form with an identical request that read:

In accordance with the Law on Free Access to Public Information, please provide us with *“Copies of the contracts you have made for informing and introducing the public to your services or activities through private broadcasters and web portals (media advertising, media campaigns and any expenses to media or journalists) in the period from 01.01.2024 to 30.04.2025.”*

Municipalities that responded the fastest	Response time in days	Municipalities that responded last	Response time in days
↓	↓	↓	↓
Valandovo	1	Resen	31
Bogovinje	1	Struga	25
Vevchani	1	Bitola	23
Karposh	1	Delchevo	23
Kavadarci	2	Kochani	21

Subject of the analysis

The subject of the analysis was not the contracts made by local government units for subscriptions to magazines and newspapers, nor the lease of advertising space in daily newspapers for publishing decisions, resolutions, advertisements, announcements for public presentation and public survey for detailed urban plans, announcements for the sale of construction land, notifications for building permits, announcements for granting use of sports facilities and fields, employment advertisements, as well as other announcements that must be published in daily newspapers according to the law.

The analysis did not focus on the impact of advertisements and campaigns financed from the budget of local governments on the editorial policy of the media outlets. The analysis was aimed at determining for what activities municipalities make media advertising contracts after the Parliament lifted the moratorium on state advertising in private media through amendments to the Law on Media.

MUNICIPALITIES COVERED BY THE ANALYSIS

Methodology for selecting the municipalities

The Republic of North Macedonia is divided into 8 (eight) planning regions, which serve statistical, economic and administrative purposes. In each planning region there are several municipalities. Some of them are larger administrative centres, some are smaller and rural areas.

In many municipalities, there are no media outlets, correspondents reporting on local problems, nor are there web portals that publish news that is of relevance to the local population.

Journalists and local media are concentrated in larger cities, which provide media coverage on the activities, events, and problems of the smaller municipalities in their immediate surroundings.

There are 80 municipalities in the Republic of North Macedonia and the City of Skopje as a separate unit of local self-government. The analysis included municipalities from all eight planning regions.

A total of 39 requests were sent in accordance with the Law on Free Access to Public Information. We received responses from 29 (twenty-nine) municipalities. Nine municipalities and the City of Skopje did not respond.

Municipalities to which a request for response was sent



The largest number of municipalities were covered in the Skopje region, more specifically, a total of ten municipalities that are part of the urban area of the capital Skopje.

Skopje region

Municipality: Aerodrom, Butel, Gazi Baba, Gjorche Petrov, Karposh, Kisela Voda, Saraj, Chair, Centar, Shuto Orizari.

In the Southwest region, we sent requests to a total of six municipalities.

Southwestern region

Municipality: Ohrid, Struga, Vevcani, Kichevo, Debar, Plasnica.

In the Eastern region, we have identified four municipalities, which are larger administrative centres and have a larger population than the other municipalities in the region.

Eastern region

Municipality: Shtip, Kochani, Delchevo, Berovo.

Four municipalities were selected from the Southeast region.

Southeast region

Municipality: Gevgelija, Valandovo, Dojran, Strumica.

The same number of municipalities in the Pelagonia and Vardar regions.

Pelagonia region

Municipality: Resen, Bitola, Prilep, Krushevo.

Vardar region

Municipality: Sveti Nikole, Veles, Negotino, Kavadarci.

In the Northeastern and Polog regions, requests for responses were submitted to three larger municipalities from each region.

Northeast region

Municipality: Lipkovo, Kumanovo, Kriva Palanka.

Polog region

Municipality: Gostivar, Bogovinje, Tetovo.

RESEARCH FINDINGS

Of the 29 municipalities that sent in their responses, 12 have not made any contracts for advertising on private televisions, radios or web portals.

Five municipalities responded after the expiration of the legally set 20-day deadline in accordance with the Law on Free Access to Public Information.

However, no municipality has approved funding for media campaigns as legally required through a vote by the Municipal Council.

What is specific is that there is an example of contracts concluded for media services even before the ban, i.e. Article 102 of the Law, was lifted, before February 2024.



Categorized by regions, the situation is as follows.

Skopje region

A request in accordance with the Law on Free Access to Public Information was sent out to the ten urban municipalities in Skopje. We did not receive a response only from the municipalities of Gjorche Petrov and Chair.

Six of the municipalities (Butel, Gazi Baba, Shuto Orizari, Saraj, Aerodrom and Kisela Voda) stated that they had not made contracts with any media outlets.

The Municipality of Centar has an agreement with a marketing agency to promote its activities, inform citizens and implement a PR communications strategy.

The Municipality of Karposh has an agreement with the state agency MIA and a media monitoring company. The state agency was obliged to cover all announcements and events of the

municipality in the media. The private monitoring company was obliged to produce a daily news review.

Pelagonia region

Of the four municipalities in the Pelagonia region to which a request was sent, the municipalities of Bitola, Prilep and Resen responded. Only the municipality of Krushevo did not submit a response within the legally set deadline. The municipality of Bitola has not made contracts with private media or individuals for advertising and promotion of the municipality's activities.

The Municipality of Resen has made two contracts with the same media outlet from Ohrid for promotional content related to events and activities of the municipality.

The Municipality of Prilep has concluded eight contracts with media outlets for publishing advertisements and announcements. The Municipality did not send the specific contracts, but only a summary of the amounts paid per media outlet.

Northeastern region

In the Northeastern region, we sent a request for a response to three municipalities - Kumanovo, Kriva Palanka and Lipkovo. We did not receive a response from Lipkovo, and the Municipality of Kumanovo responded that they had not concluded any contracts.

Kriva Palanka has a contract with a company for the visual presentation of locations in the municipality and the promotion of tourist and cultural-historical locations.

Southwestern region

In the Southwestern region, we sent questions to four municipalities. We did not receive a response from Ohrid and Plasnica. The municipalities of Kichevo and Debar responded that they had not concluded any contracts.

The Municipality of Vevchani has concluded two contracts during the period covered by the analysis, with a web portal from Ohrid for promotional announcements, notifications and news about current events and events that are of significance for the municipality.

The Municipality of Struga has one contract for the production of audio advertising spots with a local radio station from the same municipality.

Polog region

In the Polog region, we sent out a request to three municipalities - Tetovo, Gostivar and Bogovinje. Gostivar did not respond within the legally set deadline, and the Municipality of Tetovo had not concluded any contracts for cooperation with media or journalists.

The Municipality of Bogovinje has concluded four contracts with an individual from the same municipality for providing services for the professional preparation of promotional materials and media reporting at the local level and for broader media coverage.

Vardar region

In the Vardar region, we sent out questions to four larger municipalities - Veles, Sveti Nikole, Negotino and Kavadarci. Only the Municipality of Negotino failed to send in a response.

The Municipality of Veles has not concluded any contracts for advertising and promotions in the media.

The Municipality of Sveti Nikole responded that it has signed contracts with two media outlets for the production of program materials regarding the activities of the local government and recording the sessions of the Council and other working bodies.

The Municipality of Kavadarci has made contracts with two local media outlets in the analysed period – a TV station and a radio station. The media outlets are obliged to broadcast and record sessions of the Council of the Municipality of Kavadarci, produce and broadcast a campaign video to raise public awareness, and broadcast advertisements, videos and shows to promote certain activities to raise public awareness.

Southeast region

In the Southeast region, we sent out requests to four municipalities - Gevgelija, Valandovo, Dojran and Strumica. Only the municipality of Dojran did not respond.

In the two years covered by this analysis, **the Municipality of Gevgelija** only has contracts for recording and editing the sessions of the Council and the local government committees. The local television station with which it still has an active contract has been selected through a public call.

In 2024 and 2025, **the Municipality of Valandovo** has had a contract with the local radio station to record and broadcast the Council sessions and to publish announcements and other types of information of public interest.

The Municipality of Strumica has signed contracts with a media outlet from Skopje and a local media outlet from Radovish for the filming and production of video stories about significant events in the municipality.

This local government has also engaged a local citizens' association for the development, production or co-production of materials and content for the needs of the Municipality to be placed on the association's website.

The municipality also has contracts for last year and this year with a marketing agency for the production of media content and publishing on the legal entity's platform.

Eastern region

All four municipalities from the Eastern region to which we sent out requests confirmed that they have concluded contracts with media outlets and submitted copies of the contracts in question.

The Municipality of Berovo has concluded two memoranda of cooperation with a natural person from Delchevo in 2024 and 2025. The author is obliged to create and publish reports and provide media coverage of events commissioned by the Municipality and publish them on a local web portal.

The Municipality of Delchevo has also concluded annual contracts with the same individual from Delchevo. The person hired by the local government is obligated to make photographs, video materials, broadcast live from sessions of the Municipal Council and other events organized by the local government, and also publish them on a web portal.

The Municipality of Kochani has signed agreements with three local media outlets (two television stations and one radio station) for publishing greeting cards for holidays such as New Year, Christmas, Easter.

The Municipality of Shtip has the most contracts for media services concluded in the period covered by this analysis.

Last year and this year, this municipality has signed contracts for the publication of service information and media content with a local television station.

The municipality has contracts for production and co-production of media content and service information publications with three local web portals and one marketing agency.

As of June 2023, it has also had a continuous contract with a local monthly magazine for publishing various content such as texts, photos, banners, advertisements and announcements.

GENERAL CONCLUSIONS

Poor systemic transparency

Although there is a legal possibility for media advertising by municipalities after the re-voking of Article 102, no municipality has implemented a procedure that includes formal approval of campaigns by the Municipal Council, which is a prerequisite for transparency and accountability.

Lack of a clear legal procedure

In practice, there is no single defined procedure for how municipalities should conduct public interest campaigns. A large proportion of contracts are concluded without a clear methodology or public debate.

Funding outside media channels

Some municipalities conclude contracts with marketing agencies or individuals, and not directly with media outlets, which creates an additional risk of non-transparency and the possibility of circumventing media regulations.

Differences in practices between municipalities

Some municipalities have several contracts with multiple media outlets, while others do not sign contracts at all or do not respond to transparency requests.

Insertion of neutral but indirectly political content

Some contracts cover the production of «public events» or «municipal announcements,» but the content that is published often serves to positively promote the mayor or the local government, without critical distance.

Insufficient public availability of information

Rarely does any municipality publish detailed information about the contracts they've made, funds spent, or the effects of implemented campaigns, which reduces the possibility of public oversight.

RECOMMENDATIONS

Establish a unified legal framework

A bylaw or guideline should be adopted, setting out a clear procedure for planning, approving, implementing and reporting on media campaigns with public funds at the local level.

Publicly available database

The Ministry of Local Self-Government or another relevant institution should establish a centralized platform where all municipalities would be obligated to publish their contracts, budgets, content, and results of media campaigns.

Mandatory approval from the Municipal Council

Every campaign financed from the budget must be transparently reviewed and voted on at a public session of the Council.

A clear distinction between public information and political promotion

Establish criteria that will prevent the funding of content that promotes political figures rather than public interest.

Independent monitoring

Establish an external oversight mechanism (e.g. through the State Audit Office, the Media Agency or journalism organizations) that will monitor practices and publish regular reports.

Training for municipal officials

Local administrations should receive training on the proper application of the law, public procurement, and media ethics in communicating with the public.

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