

# *Resursi za poboljšanje pravnog i financijskog položaja neprofitnih medija u Republici Hrvatskoj*

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## SAMOREGULACIJA, PREPOPRUKE I MEĐUNARODNI PRAVNI STANDARDI

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<https://amarceurope.eu/the-community-radio-charter-for-europe/>
- Council of Europe (2007) *Recommendation CM/Rec(2007)2 of the Committee of Ministers to member states on media pluralism and diversity of media content*<sup>2</sup>  
[https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805d6be3](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d6be3)
- European Parliament (2008) *European Parliament resolution of 25 September 2008 on Community Media in Europe*<sup>3</sup>  
[https://www.europarl.europa.eu/doceo/document/TA-6-2008-0456\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-6-2008-0456_EN.html)
- Council of Europe (2009) *Declaration of the Committee of Ministers on the role of community media in promoting social cohesion and intercultural dialogue*<sup>4</sup>

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<sup>1</sup> "Community radio stations: (1) promote the right to communicate, assist the free flow of information and opinions, encourage creative expression and contribute to the democratic process and a pluralist society; (2) provide access to training, production and distribution facilities; encourage local creative talent and foster local traditions; and provide programmes for the benefit, entertainment, education and development of their listeners; (3) seek to have their ownership representative of local geographically recognisable communities or of communities of common interest; (4) are editorially independent of government, commercial and religious institutions and political parties in determining their programme policy; (5) provide a right of access to minority and marginalised groups and promote and protect cultural and linguistic diversity; (6) seek to honestly inform their listeners on the basis of information drawn from a diversity of sources and provide a right of reply to any person or organisation subject to serious misrepresentation; (7) are established as organisations which are not run with a view to profit and ensure their independence by being financed from a variety of sources; (8) recognise and respect the contribution of volunteers, recognise the right of paid workers to join trade unions and provide satisfactory working conditions for both; (9) operate management, programming and employment practices which oppose discriminations and which are open and accountable to all supporters, staff and volunteers; (10) foster exchange between community radio broadcasters using communications to develop greater understanding in support of peace, tolerance, democracy and development."

<sup>2</sup> "Member states should encourage the development of other media capable of contributing to pluralism and diversity and providing a space for dialogue. These media could, for example, take the form of community, local, minority or social media. The content of such media can be created mainly, but not exclusively, by and for certain groups in society, can provide a response to their specific needs or demands, and can serve as a factor of social cohesion and integration. The means of distribution, which may include digital technologies, should be adapted to the habits and needs of the public for whom these media are intended."

<sup>3</sup> "Calls on the Commission and the Member States to take into account the contents of the resolution by defining community media as: a) non-profit making and independent, not only from national, but also from local power, engaging primarily in activities of public and civil society interest, serving clearly defined objectives which always include social value and contribute to intercultural dialogue; b) accountable to the community which they seek to serve, which means that they are to inform the community about their actions and decisions, to justify them, and to be penalised in the event of any misconduct, so that the service remains controlled by the interests of the community and the creation of 'top-down' networks is prevented; c) open to participation in the creation of content by members of the community, who may participate in all aspects of operation and management, although those in charge of editorial content must have professional status;"

<sup>4</sup> "Declares its support for community media, with a view to helping them play a positive role for social cohesion and intercultural dialogue, and in this connection: i. Recognises community media as a distinct media sector, alongside public service and private commercial media and, in this connection, highlights the necessity to examine the question of how to adapt legal frameworks which would enable the recognition and the development of community media and the proper performance of their social functions; ii. Draws attention to the desirability of allocating to community media, to the extent possible, a sufficient number of frequencies, both in analogue and digital environments, and ensuring that community broadcasting media are not disadvantaged after the transition to the digital environment; iii. Underlines the need to develop and/or support educational and vocational programmes for all communities in order to encourage them to make full use of available technological platforms; iv. Stresses the desirability of: a. recognising the social value of community media and examining the possibility of committing funds at national, regional and local level to support the sector, directly and indirectly, while duly taking into account competition aspects; b. encouraging studies of good practice in community media, and facilitating co-operation and the exchange of good practice, including exchanges with such media in other regions of the world, as well as between community media and other interested media, for example by exchanging programmes and content or by developing joint projects; c. facilitating capacity building and training of community media staff, for example via training schemes within the framework of lifelong learning and media literacy, as well as staff and volunteer exchanges with other media and internship arrangements, which could enhance the quality of community media programmes; d. encouraging the media's contribution to intercultural dialogue through initiatives such as the setting up of a network to exchange information and support and facilitate initiatives which exist in this field in Europe; v. Invites community media to be conscious of

[https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805d1bd1](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d1bd1)

- UNESCO (2017) *Defining Community Broadcasting. Community Media Sustainability Policy Series*<sup>5</sup>

<https://en.unesco.org/community-media-sustainability/policy-series/defining>

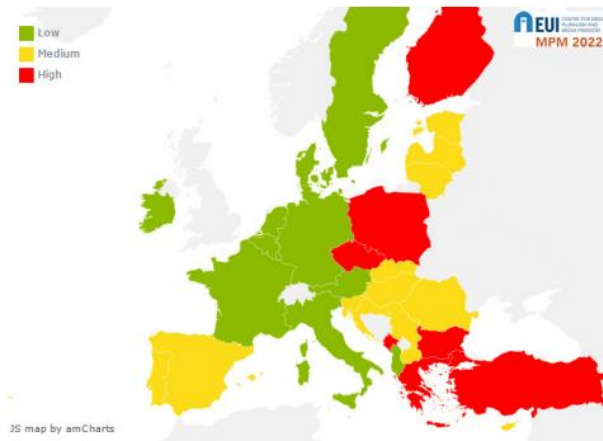
## PRAVNI POLOŽAJ MEDIJA ZAJEDNICE U EU

- CMPF (2022) *Monitoring media pluralism in the digital era: application of the Media Pluralism Monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2021. [FULL REPORT]*

<https://cadmus.eui.eu/handle/1814/74712>

### Access to media for local/regional communities and for community media<sup>6</sup>

Figure 3.4.2.a. Indicator on Access to media for local/regional communities and for community media - Map of risks per country



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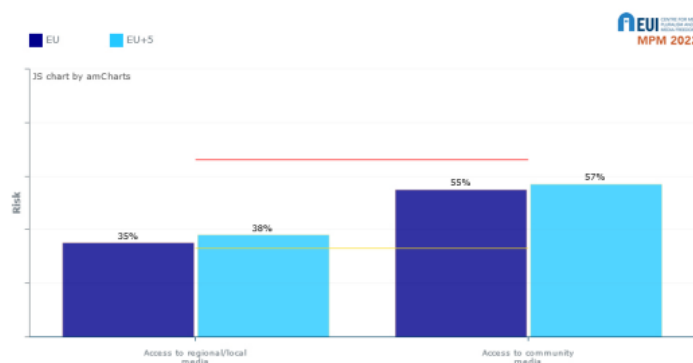
their role in promoting social cohesion and intercultural dialogue and, to this end, to elaborate and adopt or, if appropriate, review codes of professional ethics or internal guidelines and to ensure that they are respected.”

<sup>5</sup> “Providing for a clear definition of community broadcasting is the first step in the creation of a regulatory system that can promote a robust and healthy sector. Community broadcasters are generally characterised by three principles: Independence: Not-for-profit in nature and independent of government and commercial forces. Governance: Owned and/or managed by the community, who participate in policy, programming and operations. Service: They focus on issues of local concern and represent the interests of all in the community. Being not-for-profit does not preclude community broadcasters from obtaining public and private sources of funding, including advertising. An important step is to define ‘community’ which can be a geographic community and/or a community of interest. In some countries, specific programming requirements are imposed on community broadcasters, for example in terms of languages used and quotas for local content.”

<sup>6</sup> Media at the regional and local level are particularly important for democracy, since their relationship with local audiences tends to be closer, if compared to the national media. That proximity is confirmed by both the user statistics and by the level of the participation of users in the media. Regional and local media can also serve as alternative spaces for discussion for those whose identities and languages are marginalised by the national media. A solid regulatory framework and support measures can help the regional media in their democratic mission (European Audiovisual Observatory, 2016). This is becoming increasingly important now, when more and more local and regional newspapers and broadcasters are struggling to survive. Community media are also critical in ensuring media pluralism, and they are an indicator of a sound democratic society. They tend to focus on local issues, and they can contribute to facilitating local discussions (UNESCO, 2017). In the MPM, the community media are defined as being those media that are non-profit and that are accountable to the community that they seek to serve. They are open to participation by the members of the community for the creation of content. As such, they are a distinct group within the media sector, alongside commercial and public media. Community media are addressed to specific target groups, and social benefit is their primary concern. This MPM indicator assesses whether local and regional communities are guaranteed access to the media, both in terms of legal safeguards and of policy or financial support. It also covers community media, both from the point of view of the legal and practical guarantees of access to media platforms and independence, and in terms of policy measures. As the name indicates, this indicator is composed of two sub-indicators: (1) Access to local/regional communities (2) Access to community media.

<sup>7</sup> For 20 countries of the 32 studied, the risk associated with Access to media for local/regional communities and community media is either medium (13) or high (7) (see, Figure 3.4.2.a.). Poland and Greece have joined Bulgaria, the Czech Republic, Finland, Montenegro, and Turkey in the high-risk range, while Estonia, Romania and Slovakia have moved to the medium-risk range. On the other side of the spectrum, Albania, Belgium, Italy and Luxembourg have joined Austria, Denmark, France, Germany, Ireland, Malta, and The Netherlands in the low-risk band. Regarding the sub-indicator on Access to local/regional media, 16 countries are associated with a low-risk score (Austria, Belgium, Croatia,

Figure 3.4.2.b. Indicator on Access to media for local/regional communities and for community media - Averages per sub-indicator



Regarding Access to community media, nine countries are associated with low risk: Albania, Austria, Belgium, France, Germany, Ireland, Luxembourg, Malta, and Sweden. Germany, Malta and Sweden are associated with the lowest risk level (3%). In Sweden, implementing new media subsidies in February 2019 to strengthen local journalism in “white spot” areas that lack, or have weak, journalistic coverage has contributed to maintaining the low risk (Fardigh, 2022). Ten countries are associated with a medium risk: Croatia, Denmark, Estonia, Hungary, Italy, Lithuania, The Republic of North Macedonia, Serbia, Slovakia and Slovenia. Finally, 12 countries are associated with high risk: Bulgaria, Cyprus, the Czech Republic, Finland, Greece, Latvia, Montenegro, Poland, Portugal, Romania, Spain, and Turkey. Bulgaria, Cyprus, the Czech Republic, Greece, Montenegro and Turkey are associated with the maximum risk level (97%). **Community media does not have a legal definition in Bulgaria, Cyprus, the Czech Republic, Denmark, Finland, Greece, Latvia, Montenegro, Portugal, Romania, and Slovakia. In some countries, despite a legal definition, their existence is not legally guaranteed. This is the case in Croatia, Hungary, Lithuania, Poland, Slovakia, Spain, and Turkey.** However, in practice, the absence of a legal framework and safeguards for community media does not necessarily hamper the independence of community media, as in Italy, for example (Carlini et al., 2022). Inadequate subsidies often trigger the risk associated with community media. **The State provides no subsidies in Bulgaria, Estonia, Finland, Greece, Poland, The Republic of North Macedonia, Romania, Spain, and Turkey. In other countries - Albania, Austria, Croatia, France, Ireland, Italy, Lithuania, Serbia, Slovakia, and Slovenia -the level of subsidies is too limited to ensure the independence of the community media.**

Cyprus, Denmark, France, Germany, Ireland, Italy, The Netherlands, Poland, Portugal, Slovakia, Serbia, Spain, and Sweden). Among them, Denmark is associated with the lowest risk level (3%), Such a low-risk level considers the fact that the Ministry of Culture announced its intention to allocate more economic support to local and regional media to alleviate ‘news deserts’ in smaller local communities (Santos Rasmussen et al., 2022). 13 countries are in the medium risk band (Albania, Bulgaria, the Czech Republic, Greece, Hungary, Ireland, Latvia, Lithuania, Luxembourg, Montenegro, The Republic of North Macedonia, Romania, and Slovenia); while only 3 countries find themselves in the high band (Estonia, Finland, and Turkey). The high risk associated with Access to local/regional media in these three countries reflects the lack of adequate legal safeguards for local/regional media and the absence of substantial and consistent subsidies. Most countries studied have a regulatory framework that guarantees access to local and regional electronic media to media platforms, with the notable exceptions of the Czech Republic, Estonia, Finland, Montenegro, Portugal and The Republic of North Macedonia. Rather than legal risk, the main risk relating to the local and regional media is economical. No subsidies are distributed to the local and regional media in 10 countries: Albania, Bulgaria, the Czech Republic, Estonia, and Finland. Germany, the Republic of North Macedonia, Romania, Slovakia, and Turkey. For this 2022 edition of the MPM, only 3 countries studied provide local and regional media with adequate subsidies and transparently distribute them: Denmark, Portugal, and Spain.

# FINANCIRANJE MEDIJA ZAJEDNICE U ODABRANIM ZEMLJAMA ČLANICAMA

## HRVATSKI REGULATORNI OKVIR

U hrvatskom zakonodavstvu ne postoji jedinstvena definicija medija zajednice. Međutim, postoje barem tri različite vrste medija koje se *de facto* mogu razumjeti kao mediji zajednice u skladu sa međunarodno definiranim standardima (Council of Europe, 2007, European Parliament, 2008, Council of Europe, 2009, UNESCO, 2017): (1) radijski i televizijski nakladnici sa lokalnim i regionalnim koncesijama; (2) mediji nacionalnih manjina; (3) neprofitni pružatelji medijskih usluga. Definicija neprofitnih pružatelja najbliža je međunarodnim definicijama.

### 1) Radijski i televizijski nakladnici sa lokalnim i regionalnim koncesijama

Članak 8. Zakona o koncesijama (NN 107/20): "Koncesija se daje u različitim područjima i za različite djelatnosti, a osobito: (...) 20. za pružanje medijskih usluga televizije i radija". Članak 85., stavak 5. Zakona o elektroničkim medijima (NN 111/21, 114/22): "(5) Kriteriji za davanje koncesije za obavljanje djelatnosti pružanja medijskih usluga televizije i radija jesu: programski uvjeti sukladno ovom Zakonu, a napose količina vlastite proizvodnje, hrvatskih audiovizualnih djela, europskih audiovizualnih djela i djela neovisnih proizvođača; vrijeme objavljivanja; kvaliteta i raznovrsnost audiovizualnih i/ili radijskih programa; posebni tehnički, financijski uvjeti, koji uključuju visinu sredstava i financijska jamstva, te kadrovski uvjeti; poštivanje obveze plaćanja javnih davanja i doprinosa za mirovinsko i zdravstveno osiguranje u Republici Hrvatskoj." Članak 4. Pravilnika o sadržaju i postupku raspisivanja obavijesti o namjeri davanja koncesija za obavljanje djelatnosti pružanja medijskih usluga televizije i radija (NN 118/22): (1) Koncesija se daje na vrijeme od 20 godina. (2) Područje koncesije može biti na državnoj, regionalnoj, županijskoj, gradskoj, općinskoj ili na drugoj razini utvrđenoj posebnim propisom. (3) Područje koncesije na državnoj razini mora obuhvatiti najmanje 60 % stanovništva Republike Hrvatske, a na regionalnoj i nižim razinama najmanje 70 % stanovništva regije.

### 2) Mediji nacionalnih manjina

Članak 15. Ustavnog zakona o pravima nacionalnih manjina (NN 155/02, 47/10, 80/10, 93/11): "(1) Pripadnici nacionalnih manjina radi očuvanja, razvoja, promicanja i iskazivanja svog nacionalnog i kulturnog identiteta mogu osnivati udruge, zaklade i fundacije te ustanove za obavljanje djelatnosti javnog priopćavanja, kulturne, izdavačke (nakladničke), muzejske, arhivske, knjižnične i znanstvene djelatnosti. (2) Republika Hrvatska, jedinice lokalne samouprave i područne (regionalne) samouprave sukladno svojim mogućnostima, financiraju djelovanje institucija iz stavka 1. ovoga članka. (3) Udruge, zaklade, fundacije i ustanove iz stavka 1. ovoga članka mogu u nazivu iskazivati da su nacionalne manjine njihovi osnivači."

### 3) Neprofitni pružatelji medijskih usluga

Članak 55. Zakona o elektroničkim medijima (NN 111/21, 114/22): "(1) Neprofitni pružatelji medijskih usluga mogu biti neprofitni nakladnici televizije i/ili radija te neprofitni pružatelji medijskih usluga iz članaka 26. i 92. ovoga Zakona. Neprofitni pružatelji medijskih usluga i neprofitni pružatelji elektroničkih publikacija mogu biti domaće i strane udruge i njihovi savezi, zaklade, ustanove, umjetničke organizacije, komore, sindikati, udruge poslodavaca te sve druge pravne osobe kojima temeljni cilj osnivanja i djelovanja nije stjecanje dobiti, za koje iz

posebnih propisa proizlazi da su neprofitnog karaktera sukladno zakonu kojim se uređuje financijsko poslovanje i računovodstvo neprofitnih organizacija.”<sup>9</sup>

## MEHANIZMI FINANCIRANJA U RH

- Fond za poticanje pluralizma i raznovrsnosti elektroničkih medija. Članak 70, 71 Zakona o elektroničkim medijima (NN 111/21, 114/22). Pravilnik o Fondu za poticanje pluralizma i raznovrsnosti elektroničkih medija (NN 84/22).<sup>10</sup>
- Savjet za nacionalne manjine i Vijeća nacionalnih manjina
- Sredstva lokalne i regionalne samouprave
- Drugi lokalni, regionalni, nacionalni i međunarodni izvori

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<sup>9</sup> (2) Dobit od djelatnosti iz stavka 1. ovoga članka neprofitni pružatelji medijskih usluga i neprofitni pružatelji elektroničkih publikacija smiju koristiti samo za unapređenje i razvoj vlastite djelatnosti. (3) Plaće radnika i naknade članovima tijela upravljanja i nadzora neprofitnih pružatelja medijskih usluga i neprofitnih pružatelja elektroničkih publikacija koji se financiraju većim djelom iz javnih sredstava ne mogu premašiti iznos dobiven umnoškom najvećeg koeficijenta složenosti poslova za radna mjesta I. vrste i osnovice za izračun plaće sukladno zakonu kojim se uređuju plaće u javnim službama i podzakonskom propisu kojim se utvrđuju koeficijenti složenosti poslova za područje kulture. (4) Status neprofitnog pružatelja medijskih usluga u skladu s ovim Zakonom odlukom utvrđuje Vijeće pri objavi obavijesti o namjeri davanja koncesije ili dopuštenja za obavljanje djelatnosti. Za vrijeme trajanja ugovora o koncesiji ili dopuštenja za obavljanje djelatnosti ne može se mijenjati status neprofitnog pružatelja medijskih usluga. (5) Neprofitni pružatelji elektroničkih publikacija upisuju se u Upisnik iz članka 7. stavka 11. ovoga Zakona na temelju odluke Vijeća koja se donosi na njihov zahtjev. Neprofitni pružatelj elektroničkih publikacija ne može se brisati iz Upisnika dok se ne opravdaju dodijeljena sredstva iz Fonda za poticanje pluralizma i raznovrsnosti elektroničkih medija (u daljnjem tekstu: Fond) odnosno dok se ne izvrši povrat dodijeljenih sredstava sukladno odluci Vijeća. (6) Detaljne kriterije upisa u Upisnik neprofitnog pružatelja elektroničkih publikacija u skladu s ovim Zakonom utvrđuje Vijeće naputkom iz članka 7. stavka 11. ovoga Zakona.

(7) Neprofitni pružatelj medijskih usluga može objavljivati promidžbene poruke u trajanju do tri minute u jednom satu.

<sup>10</sup> Članak 4. Sredstva Fonda dijele se na šest (6) kategorija nakladnika u minimalnom postotku: 1. Nakladnici televizije i neprofitne televizije na lokalnoj i regionalnoj razini – 35 %. 2. Nakladnici radija i neprofitnog radija na lokalnoj i regionalnoj razini – 38 %. 3. Profitni pružatelji elektroničkih publikacija iz članka 71. stavak (1) ZEM-a – 9 %. 4. Neprofitni pružatelji elektroničkih publikacija iz članka 55. stavak (5) ZEM-a – 5 %. 5. Neprofitni pružatelji radija i televizije iz članka 26. i 92. ZEM-a – 1,5 %. 6. Neprofitni proizvođači audiovizualnog i radijskog programa – 1,5 %. Preostalih 10 % sredstava Fonda Vijeće će prije raspisivanja javnog natječaja raspodijeliti između šest kategorija nakladnika na temelju procjene potreba javnosti, kretanja trendova i razvoja medijske industrije.

## OSNOVE ZAGOVARANJA I MOGUĆI MODELI FINANCIRANJA

### PROBLEMI I ANALIZA STANJA

- ☒ Mehanizmi tržišnog natjecanja nisu dovoljni da se osigura medijski pluralizam i odgovarajući balans između privatnih, javnih i neprofitnih medija u javnoj sferi. Tržišni je pluralizam domena koja bilježi najviši rizik u svim zemljama EU. Vidi CMPF, 2022 i Bilić, 2023.
- ☒ Interni pluralizam u medijskom sustavu Republike Hrvatske nije reformiran u posljednjih deset godina. Posljedica: politizacija javnog servisa i nestabilno financiranje neprofitnih medija usprkos važnosti tih medija u izvještavanju o društveno relevantnim temama. Vidi Bilić 2023, Bilić i sur. 2023, Vozab i sur. 2017 itd.
- ☒ Niska socijalna uključivost medijskog sustava, kratkoročne teme i niski profesionalni standardi novinarstva. Vidi Bilić 2023 te druge akademske izvore citirane u tom članku.

### MOGUĆA RJEŠENJA

- ✓ Jasno definiran pravni položaj medija zajednice sa naglaskom na neprofitnom statusu (treći medijski sektor) i ulozi neprofitnih medija u razvoju internog pluralizma medijskog sustava, poticanju društvene uključivosti i kritičkog mišljenja lokalnih i regionalnih zajednica ali i političke zajednice svih građana RH (primjeri Council of Europe, 2007, European Parliament, 2008, Council of Europe, 2009, UNESCO, 2017, Seethaler & Beaufort, 2017, Biringer, Peissl & Seethaler, 2022).
- ✓ Uspostava udruženja ili stručnog vijeća za medije zajednice koje će snažnije sudjelovati u raspravama o medijskim politikama (primjeri Austrije, Danske, Španjolske)
- ✓ Izmjena Pravilnika o Fondu za poticanje pluralizma i raznovrsnosti elektroničkih medija (NN 84/22), odnosno smanjenje udjela privatnih lokalnih i regionalnih medija te privatnih elektroničkih publikacija u distribuciji sredstava Fonda.
- ✓ Razvoj novih modela financiranja za neprofitne elektroničke publikacije kroz oporezivanje bruto prihoda digitalnih platformi (Google, Facebook) ostvarenih na području RH (vidjeti Bilić i Primorac, 2018) i razvoj novog (digitalnog) fonda. Model djelomično uveden kroz Zakon o elektroničkim medijima (Članak 81 NN 111/21, 114/22) i 0,5% godišnjeg bruto prihoda platformi za razmjenu videozapisa kojima će se financirati rad Agencije za elektroničke medije.
- ✓ Povećanje vidljivosti neprofitne produkcije kroz *must-carry* obaveze za HRT i pay-TV operatere (primjer Irske)
- ✓ Snažnija zastupljenost medija zajednice u European Media Freedom Act (Uloga Community Media Forum Europe)<sup>11</sup>

<sup>11</sup> [https://www.europarl.europa.eu/thinktank/hr/document/EPRS\\_BRI\(2022\)739202](https://www.europarl.europa.eu/thinktank/hr/document/EPRS_BRI(2022)739202)

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## OSTALI RESURSI

- Community Media Forum Europe: <https://www.cmfe.eu/>
- Journal of Alternative and Community Media: <https://www.intellectbooks.com/journal-of-alternative-community-media>



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Analiza nije namijenjena za publikaciju i neograničenu distribuciju.