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# THE UNSTANDARDIZED FIGHT AGAINST DISINFORMATION

A Needs Analysis for Legal and Strategic Changes  
to Address the Challenges of Disinformation in Kosovo

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# EXECUTIVE SUMMARY

This analysis aims to identify legal gaps and the lack of clear policies that would address the problem of disinformation in Kosovo

Kosovo faces serious challenges from hybrid attacks and disinformation that originate from multiple sources. Harmful content is disseminated through various channels, including traditional media (television and radio), as well as online channels, such as online media outlets, closed groups, and other platforms on social networks.

Kosovo has a modern constitution and legislation which, at the time of its adoption, was in line with the standards of the European Union. Nevertheless, the legislation regulating and standardizing audiovisual platforms and online platforms has become outdated and is no longer aligned with European regulations and the new standards of the European Union.

As a result, many of the standards established by the *Digital Services Act*<sup>1</sup>, the *European Media Freedom Act* (EMFA)<sup>2</sup>, and *Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online* (TCO – Terrorist Content Online)<sup>3</sup> are not being implemented in Kosovo.

In addition to the insufficient incorporation of the standards established by the *Digital Services Act* (DSA), the *Terrorist Content Online Regulation* (TCO), and the *European Media*

*Freedom Act* (EMFA), Kosovo's legislation should also be aligned with the *Audiovisual Media Services Directive* (AVMSD) in order to guarantee the independence of the regulator and the standardization of commercial communications. Furthermore, it should be harmonized with the *Artificial Intelligence Act* (AI Act) to regulate protection against technologically generated disinformation.

This reform should be further complemented by integrating the principles of the *General Data Protection Regulation* (GDPR) and the *Copyright Directive*, thereby creating a unified legal framework that enables the transition from merely administrative transparency to a substantive and verifiable system that protects media pluralism, editorial independence, and national resilience against hybrid attacks.

Within the framework of the proposed legal reform, the effectiveness of the implementation of the *Digital Services Act* (DSA) in Kosovo is interdependent with the application of the principles of the *European Media Freedom Act* (EMFA) regarding transparency of ownership and financing. Currently, Kosovo operates with a fragmented transparency system that provides only an administrative overview, without penetrating the real structures of control and economic interests.

1 European Parliament and the Council of the European Union. (2022). Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act). Official Journal of the European Union. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R2065>

2 European Parliament and the Council of the European Union. (2024). Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act). Official Journal of the European Union. Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L\\_202401083](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202401083)

3 European Parliament and the Council of the European Union. (2024). Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act). Official Journal of the European Union. Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L\\_202401083](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202401083)

While the DSA requires mechanisms to address disinformation and the appointment of a Digital Services Coordinator to regulate online platforms, such oversight remains ineffective if the real “beneficial owners” of the media outlets distributing content are not identified.

Unlike the current framework, which is based on formal declarations, the *European Media Freedom Act* (EMFA), particularly Articles 6 and 7, requires that information on ownership and the main sources of financing—including state advertising—be publicly accessible and verifiable. Without such substantive transparency, Kosovo’s institutions cannot establish effective communication with global platforms (such as Meta or TikTok) to identify hybrid attacks, as the necessary reference point for editorial accountability is not accessible.

Consequently, the integration of the standards of the *Digital Services Act* (DSA) should serve as a technical instrument for protecting the digital space, while the *European Media Freedom Act* (EMFA) should function as a structural instrument to ensure that behind every piece of online information there is an entity with transparent ownership and protected editorial independence.

Fragmented in their competencies and approaches, Kosovo’s institutions have not established clear communication with social media platforms. International cooperation also remains challenging, particularly with countries in the region where some of the platforms that disseminate disinformation about Kosovo are based.

At the national level, Kosovo is among the few countries that does not have a national strategy against disinformation or a comprehensive national plan for addressing it.

As a result, public institutions and media organizations do not have clearly defined responsibilities for dealing with disinformation.

In most institutions in the country, officials are not trained to identify the sources of disinformation, nor do they have clear strategies on how to prevent the spread of such content. Moreover, for the majority of public officials responsible for communication with the media and the public, addressing disinformation is not included in their official job descriptions.

Serious challenges also exist in the management of the official communication channels of public institutions. Kosovo does not have a legal regulatory framework governing the presence of public institutions on social media platforms (such as Facebook, TikTok, or other networks). As a result, the institutional presence on social media is fragmented and lacks standardized practices.

Furthermore, institutions have not managed to establish clear communication with social media platforms in order to build rapid mechanisms for the removal of harmful content.

Kosovo as a country, and the Albanian language, are still not fully recognized by platforms such as Google. This has significantly disrupted the country’s online presence. Due to the lack of membership in certain international mechanisms, Kosovo does not have its own country URL code, and as a result some online platforms operate through addresses registered outside the country.

Within the country, there is no mechanism responsible for collecting and evaluating harmful content, while judicial procedures for addressing such content are lengthy and often ineffective because too much time passes before action is taken.

Data collected indicate that the majority of officials working in the field of communication are not adequately equipped and do not use online platforms to monitor or track disinformation.

Similar to public institutions, media organizations also face serious challenges due to their vulnerability to disinformation.

The current media legislation in Kosovo does not promote financial transparency and does not aim to expose the sources of media funding.

# METHODOLOGY

This report is an analysis of the situation on the ground and the legal framework regulating the field of disinformation prevention in Kosovo.

For the purpose of this analysis, BIRN conducted structured interviews with representatives of Kosovo's institutions, sent detailed semi-structured questionnaires to the Independent Media Commission, the Tax Administration of Kosovo, and the Kosovo Business Registration Agency. They also analyzed the legal framework of more than 10 laws and around 30 other relevant legal documents and statutory instruments in Kosovo, and examined the European Union's legal framework in the relevant field.

Based on the collected data, the research assessed the alignment of Kosovo's legislation with EU legislation in the field of disinformation and digital rights. It addressed issues related to media transparency and the structural challenges of media accountability toward the public. The research also analyzed the strategic approach and the capacity of Kosovo's institutions to confront the challenges of disinformation. Based on concrete findings, specific recommendations were developed for institutions and media organizations with the aim of addressing the problem of disinformation in the country more effectively.

# ALIGNMENT OF LEGISLATION WITH EU LEGISLATION

The scope of activity and the daily work of media in Kosovo are regulated through a complex legal framework that covers editorial activity, the protection of personal data, and the safeguarding of copyright.

This activity is specifically governed by the *Law on the Independent Media Commission*, the *Law on Personal Data Protection*, the *Law on the Protection of Journalists' Sources*, the *Law on the Tax Administration of Kosovo*, the *Law on Copyright and Related Rights*, as well as the legislation of the Regulatory Authority of Electronic and Postal Communications (ARKEP), which together regulate the sphere of audiovisual and online publications.

However, the majority of this legislation was adopted before 2019 and does not reflect the standards of the European Union promoted through the most recent European regulatory package.

This legal vacuum is particularly evident in the absence of the implementation of *Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services* (Digital Services Act – DSA), which requires the designation of a Digital Services Coordinator (DSC) to establish official communication with online platforms—a mechanism that Kosovo currently lacks entirely.

Although Kosovo is not a member state of the European Union, obligations for legal harmonization stem from the process of European integration and the country's state aspirations, which are defined in the *Stabilisation and Association Agreement*.

This process requires Kosovo to adopt the highest standards of digital security in order to guarantee a safe information environment and democratic functioning. However, in the absence of such harmonization, the country remains exposed to hybrid attacks and systematic disinformation. Currently, the misalignment of domestic legislation with the standards introduced in 2022 leaves Kosovo without the necessary legal basis to demand accountability from technology giants operating within its territory, making it impossible to properly assess the systemic risks originating from online platforms.

In addition to the absence of a Digital Services Coordinator, Kosovo also lacks other essential elements envisaged by the Digital Services Act, such as rapid response mechanisms and procedures for the removal of harmful content, as well as clear sanctioning measures against platforms that violate online safety rules.

Furthermore, the country has no national strategy against disinformation and a regulatory framework governing the presence of public institutions on social media, resulting in fragmented institutional communication without clear standards of accountability. This institutional vacuum is further compounded by the lack of a central mechanism for collecting and assessing harmful content, leaving the handling of such cases solely to judicial procedures, which tend to be excessively lengthy and often produce limited practical effects.

At the same time, *Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market* (European Media Freedom Act – EMFA) and *Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 on audiovisual media services* (AVMSD) require a transition from purely administrative and procedural transparency toward the substantive disclosure of real beneficial owners and sources of public financing.

Within the framework of this research, the need to update legislation in Kosovo becomes urgent, as the current system mainly provides an administrative overview of formal ownership without penetrating the real structures of control and economic interests behind media outlets.

While the existing legislation relies on fragmented reporting between the Independent Media Commission, the Kosovo Business Registration Agency (KBRA), and the Tax Administration, this system fails to identify the real beneficial owners and the ultimate sources of financing, which is inconsistent with the standards of the European Media Freedom Act (EMFA).

Alignment with this European framework requires that information on substantive ownership should not remain solely an object of reporting to the regulator, but should instead be transformed into horizontal and publicly accessible transparency, ensuring that editorial accountability can be verified by citizens.

The updating of legislation should focus on establishing detailed criteria for assessing effective economic control, going beyond the formal procedural declarations that currently make it difficult to detect hidden concentration through intermediary companies or chain ownership structures.

In line with the standards of the European Media Freedom Act (EMFA) and the Audiovisual Media Services Directive (AVMSD), Kosovo should integrate a “substantive test” for editorial influence and ensure full transparency regarding public funds, including state advertising and subsidies. This transition toward an integrated sectoral oversight framework would strengthen editorial independence and guarantee that informational pluralism is protected from external political and economic influence.

These remain challenges that the current domestic framework fails to address due to the fragmented reporting system and the absence of a substantive test for real economic and editorial control.

Furthermore, the protection of the information space requires urgent harmonization with *Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online* (TCO Regulation), in order to enable rapid responses to online radicalization.

Protecting the information space from disinformation and terrorist propaganda has become one of the key pillars of national security, as the rapid spread of extremist content online directly threatens the country’s stability. Nevertheless, this protection remains largely paralyzed in practice due to the absence of a legal framework aligned with the standards of the European Union.

Without such harmonization, Kosovo’s institutions lack the legal authority to compel technology giants to comply, which results in requests for content moderation being treated by platforms such as Meta, TikTok, or X merely as voluntary suggestions rather than binding legal orders.

This regulatory isolation creates critical delays in responding to hybrid attacks, leaving the country outside the umbrella of the *Digital Services Act* (DSA) sanctions and enforcement mechanisms that are available to EU member states.

In the absence of a shared legal ‘language,’ global platforms often disregard the authority of Kosovo’s institutions, effectively turning the country into a space where harmful content circulates without legal consequences for service providers. As a result, Kosovo remains fully dependent on the goodwill of technology companies rather than being protected through standardized legal accountability.

This process should also be accompanied by the continuous alignment with EU standards on the protection of natural persons with regard to the processing of personal data (GDPR) and the *Copyright Directive* within the sectoral oversight of online media.

Finally, the absence of a legal framework for Artificial Intelligence, aligned with *Regulation (EU) 2024/1689 of the European Parliament and of the Council on Artificial Intelligence (Artificial Intelligence Act - AI Act)*, leaves the information environment unprotected against emerging manipulative technologies such as deepfakes and other forms of synthetic media, making a comprehensive reform necessary to safeguard pluralism and national resilience against disinformation.

Beyond manipulative images and videos, the most significant current risk arises from the use of Generative Artificial Intelligence to instantly produce hundreds of thousands of articles and automated accounts (bots) that simulate public opinion.

Without the rules established by the *EU Artificial Intelligence Act (AI Act)*, Kosovo remains unprotected against sophisticated 'bot farms' that use language models to generate false narratives in the Albanian language, making disinformation appear as authentic human conversation.

This automation has lowered the cost of hybrid attacks, allowing malicious actors to dominate the digital sphere with coordinated messages that undermine trust in institutions and democratic processes.

On another level, the absence of regulation enables the use of profiling algorithms that exploit citizens' data in order to target them with manipulative messages based on fear or prejudice (micro-targeting).

According to European standards, AI systems used to influence voter behaviour or to curate news are classified as 'high-risk' and therefore require maximum transparency regarding how they function.

In Kosovo, due to the legal vacuum, there is currently no oversight of the 'black boxes' of algorithms that determine what information is shown to citizens. This allows the creation of 'information bubbles' that foster polarization and radicalization, without any possibility of accountability from platforms or technology developers.

This legal ambiguity also extends to the level of editorial accountability, where currently no rule exists that determines who bears responsibility when an artificial intelligence system produces defamatory or inaccurate content. In the absence of harmonization with the *EU Artificial Intelligence Act*, it remains undefined in Kosovo what constitutes permitted use of AI in newsrooms and which forms of automation represent ethical or legal violations.

This situation creates an environment in which the lack of transparency regarding the use of algorithms enables the manipulation of audiences without any form of oversight, as neither media organizations nor online platforms are legally required to disclose when a news item, image, or analysis is generated by artificial intelligence rather than by human work.

Furthermore, the lack of alignment with EU standards makes it impossible to establish a risk classification system, as foreseen by the *AI Act*, which would differentiate between various types of artificial intelligence based on their potential impact on public opinion.

This absence of clear criteria means that AI systems used to profile citizens' behaviour or manipulate political perceptions operate without any limitations, while professional journalism remains at a disadvantage when confronted with organized 'disinformation farms.'

Without a reform that imposes accountability on both the developers and users of these technologies, the media sector in Kosovo will continue to face a crisis of credibility, where technology is not used to improve the quality of information, but rather it is exploited as a tool to conceal authorship and evade legal responsibility.

# STAGNATION IN THE REFORM FOR TRANSPARENCY IN MEDIA FINANCING

Media in Kosovo formally enjoy freedom of expression and pluralism under the Constitution; however, in recent years the media landscape has faced serious challenges regarding ownership transparency, financial sustainability, and editorial independence.

At first glance, the media environment in Kosovo is characterized by a large diversity of media outlets and platforms, creating the perception of a pluralistic and competitive market. This pluralism is also supported by the existence of several institutional public registers through which basic information on the legal status and formal ownership of media is published. The Independent Media Commission maintains the register of licensed television and radio broadcasters, the Kosovo Business Registration Agency records media outlets operating as business entities, while the Department for NGOs maintains data on media organized as non-profit organizations.

However, this fragmented transparency system primarily provides an administrative overview of formal ownership without penetrating the real structures of control and economic interests behind media outlets. As a result, real ownership, including beneficial owners and the ultimate sources of financing, remains largely unidentified, undermining the credibility, accountability, and editorial independence of the media sector.

International reports have consistently highlighted the lack of transparency in the ownership and financing structures of Kosovo's media, making the sector vulnerable to political and economic influence.

According to the *European Commission's 2025 Progress Report*, in its broader assessment of the state of media and civil society in Kosovo, the need for the collection and dissemination

of reliable information has been emphasized, particularly by improving access to information on beneficial media ownership through accessible and functional public registers.

The report also notes that the lack of transparency in media ownership and financing exposes media outlets to political and economic influence, thereby threatening the integrity of media content and the pluralism of the information market.

As a result, media owners often remain hidden behind various ownership schemes, while most media outlets, especially online portals, do not provide the public with complete information (or any information at all) about their owners or sources of financing.

These circumstances have created conditions for concealed ownership, external influence on editorial content, and an increased risk of the spread of disinformation in the absence of accountability.

The regulatory context has evolved very slowly. The Independent Media Commission (IMC) the only regulatory body for audiovisual broadcasters operates on the basis of *Law No. 04/L-44 (2012)*<sup>4</sup>, which guarantees the principles of media pluralism.

Although the adoption of the *Regulation on ownership and concentration of licensees* represents an important normative step toward addressing media ownership concentration, it still does not ensure effective and substantive oversight of concentration in practice.

4 Assembly of the Republic of Kosovo. (2012). Law No. 04/L-44 on the Independent Media Commission. Available at – <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2809>

The regulation primarily focuses on the formal transparency of ownership and on limitations based on legal structures and individual licenses, without establishing clear mechanisms for identifying ultimate economic control or for consolidating formally separate structures that are, in reality, controlled by the same actors.

The absence of a normative definition of a beneficial owner and the lack of detailed criteria for assessing effective control make it difficult to detect real concentration through intermediary companies or chain ownership structures.

In the absence of a structured linkage with horizontal mechanisms of financial and ownership transparency such as the Register of Beneficial Owners and tax oversight and without a regular procedure for the substantive review of reported data, the regulation remains a necessary but insufficient instrument for guaranteeing real pluralism and preventing hidden concentration of media ownership.

The legal framework governing media in Kosovo still contains gaps related to the obligation to declare real beneficial owners, particularly for online portals and emerging digital media formats.

Meanwhile, the Assembly of Kosovo adopted a new *Law on the Independent Media Commission* in July 2024, which expanded its competencies (for example, by enabling the licensing of online media that publish video content). However, the law was strongly criticized by the European Union and civil society for undermining the independence of the regulator and the proportionality of its measures.

The law was challenged before the Constitutional Court by several political and non-governmental actors, and in April 2025 the Court declared it unconstitutional due to several provisions that violated constitutional principles particularly those related to the process of appointment and dismissal of IMC members, the scope of its competencies, and the sanctions envisaged.

As a result, Kosovo currently continues to operate under the existing legal framework, facing gaps in the oversight of media ownership while awaiting new legislative reforms.

Challenges in the media sector in Kosovo are also reflected in the country's overall progress toward European Union integration, where transparent practices regarding media ownership and financing are considered essential indicators of a functioning democratic society and a free and independent information environment.

At the European level, the regulatory approach to media is evolving toward a more integrated model, where editorial independence is no longer treated separately from transparency in ownership and financing.

The new European framework particularly through the *European Media Freedom Act* (EMFA) and the *Audiovisual Media Services Directive* (AVMSD) places transparency at the core of guaranteeing pluralism and protecting media from political and economic influence.

These instruments require member states to ensure public access to information on the real owners of media outlets, control structures, and the main sources of financing, as well as increased transparency regarding public funds, including state advertising, subsidies, and other forms of financial support from public institutions.

In particular, the *European Media Freedom Act* (EMFA), adopted in 2024 by the European Parliament and the Council of the European Union, places transparency of media ownership and financing at the core of guaranteeing pluralism and editorial independence.

Through Article 6 and Article 7, the EMFA requires public access to information on the real owners of media outlets and full transparency of public financing, making it clear that media independence cannot be guaranteed without substantive transparency.

Within this framework, transparency of state financing is seen as a necessary condition for preventing the selective use of public resources for editorial influence or political favoritism.

This European regulatory climate clearly demonstrates that the formal guarantee of media independence is insufficient without effective mechanisms for transparency of ownership and financing, placing Kosovo before the need for substantive harmonization of its legal and institutional framework with EU standards.

In this context, the lack of real transparency in media ownership and financing does not only represent a regulatory issue, but also a structural challenge for pluralism, information integrity, and resilience against disinformation.

This document analyzes the gaps in the existing legal and regulatory framework in Kosovo and provides concrete legal and institutional recommendations for strengthening ownership transparency, overseeing market concentration, and protecting editorial independence, in line with the standards of the European Union.

## Legal transparency of media ownership

The constitutional and legal framework in Kosovo provides clear principles and obligations regarding media transparency. However, in practice this transparency manifests primarily in a formal and procedural manner, without ensuring the real disclosure of ownership structures, economic control, and sources of financing that influence the functioning and editorial independence of media outlets.

The normative basis for regulating the media sector and ownership transparency in Kosovo originates from the *Constitution of the Republic of Kosovo*, which guarantees freedom of expression and media pluralism as fundamental values of the constitutional order.

The Constitution recognizes the role of media in a democratic society and authorizes the establishment of an independent regulatory authority for the audiovisual sector in order to safeguard the public interest, pluralism, and fair competition in the media market.

Within this constitutional framework, *Law No. 04/L-44 on the Independent Media Commission* defines the IMC as the only independent body responsible for regulating, licensing, and supervising audiovisual media service providers in Kosovo.

The law directly links the exercise of media activity with the respect for the principles of transparency, pluralism, and competition, granting the IMC the authority to establish licensing conditions and to monitor the compliance of media outlets with these conditions.

The *Law on the IMC* also requires media service providers to operate transparently and to cooperate with the regulator by providing complete and accurate information regarding their organizational and ownership structures.

In this regard, the IMC is authorized to request data and documentation related to the ownership, management, and operation of media outlets, as well as to undertake administrative and sanctioning measures in cases where licensing conditions or secondary legislation are violated.

Although the annual reports submitted to the Independent Media Commission (IMC) constitute an important source of information on the functioning and financing of media outlets, they are treated primarily as administrative documents and are not published systematically, thereby failing to fulfill the function of public transparency.

However, these legal provisions mainly focus on the formal declaration of ownership and the procedural compliance with obligations toward the regulator, without establishing detailed mechanisms for identifying real control and for the substantive verification of complex ownership structures.

Within this legal framework, transparency of media ownership is further operationalized through the secondary legislation of the IMC, which requires reporting and notification of changes in ownership and organizational structure.

Nevertheless, even at this level, transparency remains largely limited to reporting to the regulator and does not automatically translate into public and verifiable transparency for citizens, civil society, and other interested stakeholders.

In practice, the current legal framework in Kosovo creates a fragmented reporting system for media ownership and financing, which is distributed across several institutions but is not consolidated into a single mechanism that is accessible and verifiable for the public.

The transparency produced by this system remains largely administrative and procedural, intended more to fulfill institutional requirements than to provide clear and comprehensive information to the public regarding the control and financing of media outlets.

At the secondary legislative level, the procedural and reporting transparency of audiovisual media is operationalized through the *IMC Regulation on Audio and Audiovisual Media Service Providers (IMC-2021/01)*, which establishes a range of continuous obligations for reporting, notification, and cooperation with the regulator throughout the entire period of the license's validity.

According to Article 15, the media service provider bears full responsibility for conducting its activities in accordance with the law, regulations, and license conditions, including the obligation to notify the IMC of any change that may affect the exercise of media activity.

The Regulation stipulates that essential elements of the license, including the organizational structure and operational conditions, cannot be changed without the prior approval of the IMC (Article 15, paragraphs 8 and 9). Furthermore, the license holder is required to maintain the relevant documentation and make it available to the IMC for monitoring and verification purposes (Article 15, paragraph 7).

Oversight of compliance with these obligations is carried out through the IMC's monitoring and inspection powers, while failure to comply with reporting and notification obligations may result in sanctioning measures pursuant to Articles 23 and 24 of the Regulation.

However, this regime mainly creates vertical and administrative transparency, oriented toward regulatory control of license compliance,

without establishing obligations for the regular publication of data for the public or mechanisms to transform institutional reporting into publicly understandable and verifiable transparency.

According to *Law No. 04/L-44 on the Independent Media Commission*, audiovisual media service providers are obliged to cooperate with the IMC and to provide accurate information regarding their ownership, organizational structure, and operation (Article 3, paragraph 2, and Article 28).

These obligations are further specified through the *Regulation on Ownership and Concentration of Licensees*, which establishes in Article 8 the obligation of license holders to report to the Independent Media Commission (IMC) about, among other things, the identity of direct and indirect owners, the percentage of shares and voting rights, the organizational structure, executive responsible persons, and any change in ownership or management.

The Regulation also provides for the obligation to regularly update this information: any change in ownership, organizational structure, or sources of financing exceeding the threshold of 30% must be reported to the IMC within five (5) working days (Article 8, paragraph 4).

Formally, this mechanism creates a sufficient basis for administrative oversight by the IMC, which has the authority to review reports, request additional clarifications, and apply sanctioning measures in cases of non-reporting or inaccurate reporting (Article 9 of the Regulation).

However, the transparency produced through this mechanism remains largely vertical (regulator–entity) and does not automatically translate into horizontal transparency for the public. The registers published by the IMC on its website usually contain only basic data on licenses, formal owners, and share percentages, without analysis of links between entities, without identification of effective control, and without connection to the real sources of financing.

In a broader context, *Law No. 08/L-265 on the Register of Beneficial Owners* establishes for the first time a clear legal basis for identifying the real beneficial owner as the natural person who exercises ultimate control over a legal entity (Article 3, paragraphs 1.3–1.6).

This law also applies to commercial companies and non-governmental organizations that operate as media outlets (Article 2), obliging them to declare beneficial ownership in the Central Register maintained by the Kosovo Business Registration Agency (KBRA). However, this regime remains horizontal and general in nature, primarily oriented toward the objectives of preventing money laundering and terrorist financing, and is not functionally integrated with the sectoral oversight exercised by the Independent Media Commission (IMC).

From a financial perspective, the Tax Administration of Kosovo holds detailed data on the revenues, expenditures, and sources of media financing. However, the Law on the Administration of Tax Procedures strictly limits the disclosure of this data to the public, particularly for small and medium-sized businesses, which include the majority of private media outlets (provisions on tax confidentiality). As a result, the public does not have systematic access to the financial statements of media organizations, nor to information regarding their dependence on state advertising or other public funding sources.

Within this institutional configuration, media transparency in Kosovo is fragmented, without a unified mechanism linking formal ownership, beneficial ownership, and financing. This situation is inconsistent with the standards of the *European Media Freedom Act* (EMFA), which requires declaration of and effective public access to information on the real owners of media outlets and the main sources of financing, including public funding and state advertising (Articles 6 and 7 of the EMFA).

Media outlets registered as non-governmental organizations are subject to financial and narrative reporting obligations to the Department for NGOs; however, these reports also fail to provide sufficient public transparency regarding the real sources of financing and the economic influences on editorial activity.

Consequently, although the legal framework in Kosovo provides for numerous reporting obligations and supervisory mechanisms on paper, the lack of institutional interconnection, substantive verification, and integrated public transparency means that the current system fails to meet the standard of real transparency required to guarantee media pluralism and editorial independence.

In summary, the current media transparency system in Kosovo produces extensive institutional reporting, but not effective public transparency. Media outlets report in parallel to the IMC, the Kosovo Business Registration Agency, the Tax Administration of Kosovo, and the Department for NGOs; however, this information remains fragmented, unconnected, and largely inaccessible to the public. As a result, there is administrative transparency for the state, but not real transparency for citizens, which runs contrary to the standards of the *European Media Freedom Act* (EMFA) and the principle of informational pluralism.

## Regulation of media ownership and concentration

The regulation of media ownership and the prevention of market ownership concentration are essential elements for guaranteeing media pluralism, freedom of expression, and the quality of information in a democratic society. In Kosovo, these principles derive directly from the constitutional order and are implemented through a combination of sector-specific legal provisions and general mechanisms of ownership and financial transparency.

In the absence of effective mechanisms to limit ownership concentration, media pluralism risks remaining merely formal. Ownership concentration, particularly through indirect structures and hidden ownership, creates the risk of editorial uniformity, increased economic or political influence over content, and the weakening of the media's role as a watchdog of the public interest.

Consequently, the issue of media ownership is not only a matter of market competition, but also directly a matter of information quality and democratic functioning.

The *Constitution of the Republic of Kosovo* guarantees freedom of expression and freedom of the media as fundamental rights, linking their exercise to the public interest and the principle of pluralism. In this sense, media pluralism is not understood merely as the formal existence of a number of media outlets, but as the real guarantee of diversity in sources of information, opinions, and viewpoints, without domination by a single economic or political actor.

*The Constitution* also authorizes the establishment of an independent regulatory authority the Independent Media Commission (IMC) for the audiovisual sector, with a mandate to protect these values in practice.

Based on this constitutional foundation, *Law No. 04/L-44 on the Independent Media Commission* defines the IMC as the only independent body responsible for regulating, licensing, and supervising audiovisual media service providers in Kosovo. The law links the exercise of media activity with respect for the principles of pluralism, fair competition, and transparency, granting the IMC the authority to establish licensing conditions and to intervene in cases where these principles are violated.

However, *the Law on the Independent Media Commission* itself remains relatively broad with regard to ownership and concentration, as it does not provide detailed criteria for assessing real economic control and the connections between formally separate entities.

Precisely in order to address this gap, the Independent Media Commission (IMC) adopted in 2023 the *Regulation on Ownership and Concentration of Licensees* (IMC Regulation), which constitutes the main secondary legal instrument for the concrete regulation of media ownership and the limitation of concentration in the audiovisual market.

The *IMC Regulation on Ownership and Concentration of Licensees* has a clearly defined and sector-limited scope of application. It applies to all audio and audiovisual media service providers licensed by the IMC and aims to regulate ownership relations, concentration limits, and structural transparency within the audiovisual market. In essence, the regulation functions as both an ex ante and ex post control instrument over the ownership structures of

license holders, protecting pluralism, media diversity, and the public interest.

In substantive terms, the regulation addresses three main issues:

- The permitted limits of ownership and concentration at the level of licenses and the market,
- Prohibitions on certain forms of ownership that create conflicts of interest or risks to editorial independence (e.g., political affiliations, cross-sector ownership), and
- Structural transparency obligations for license holders, including the reporting of direct and indirect ownership, ownership chains, and substantial changes.

These mechanisms aim to prevent market dominance and the multiple control of media outlets by the same economic or political actors.

The purpose of the *IMC Regulation on Ownership and Concentration of Licensees* is to establish standards for media pluralism and diversity, increase ownership transparency, and prevent excessive dominance in the audiovisual market.

The Regulation applies to all audio and audiovisual media service providers licensed by the Independent Media Commission in the Republic of Kosovo and represents the main secondary legal instrument for controlling ownership structures in this sector.

The Regulation introduces, for the first time, clear definitions of direct and indirect ownership, recognizing that control over a media outlet may be exercised not only through the formal holding of shares but also through intermediary structures and influence over strategic decision-making.

Indirect ownership is defined as ownership or control exercised through one or more legal entities, reflecting the reality of chain ownership structures and indirect forms of exercising economic control.

Regarding concentration, the Regulation establishes concrete limits on the number of licenses that may be held by the same natural or legal person, prohibits certain combinations of roles within the sector (such as combining content provision with distribution), and provides restrictions on mergers or acquisitions that could lead to market dominance and undermine media pluralism.

These mechanisms aim to prevent control over multiple media outlets by the same economic or political actors and to protect fair competition in the audiovisual market.

An important element of the Regulation is the obligation for transparency of ownership structures, including the requirement that, where the owner of a media outlet is a legal entity, the full chain of ownership must be disclosed up to the ultimate owner. This provision seeks to address the use of shell companies and hidden structures of formal control.

However, although the Regulation recognizes indirect ownership and requires disclosure of the ownership chain, it does not independently define the concept of a “beneficial owner” nor establish substantive criteria for identifying real economic and editorial control.

Control is largely based on the formal declarations of licensed entities, without a clear test for assessing effective influence over decision-making and editorial content.

As a result, the regulation establishes a necessary regulatory framework, but one that remains insufficient for the real control of media ownership concentration. It does not provide for advanced verification mechanisms, market impact analyses, or instruments for identifying sophisticated forms of concentration through related entities and chain ownership structures.

Moreover, the Regulation does not create a functional mechanism for the exchange and integration of data with horizontal registers of ownership and financing, limiting its role primarily to the formal control of legal structures and licenses.

In the absence of a substantive test for real control and an operational link with mechanisms of ownership and financial transparency, its capacity to identify hidden influences over editorial content remains limited.

**Law No. 05/L-096 on the Prevention of Money Laundering and Combating the Financing of Terrorism** represents a key horizontal pillar for ownership transparency, as it provides the most comprehensive and substantive definition of a “beneficial owner” within the legal order of Kosovo.

According to Article 2, paragraph 1.36, a beneficial owner is the natural person who

ultimately owns or exercises effective control over a legal entity, whether through direct or indirect ownership or through other forms of control, including influence over management and decision-making.

This definition goes beyond the formal concept of a shareholder and seeks to identify who has real economic control, addressing the risk of the use of chain structures, shell companies, and nominal intermediaries. The relevance of this law for the media sector lies in the fact that media outlets, whether operating as commercial companies or non-governmental organizations, fall within its scope and are obliged to identify and declare their beneficial owners.

However, this regime is primarily designed for the purposes of preventing money laundering and terrorist financing and is not functionally integrated with the sectoral oversight of the Independent Media Commission (IMC), thereby creating a gap between the horizontal identification of beneficial owners and the assessment of real ownership concentration and its impact on media pluralism.

While Law No. 05/L-096 establishes the conceptual and substantive basis for identifying the beneficial owner, it addresses this issue mainly from the perspective of preventing money laundering and terrorist financing, without creating a dedicated mechanism for consolidating and providing systematic access to this data.

The need to transform this definition from a legal norm into a functional mechanism and to centralize data on real beneficial owners was subsequently addressed through a separate legal instrument, which aims to convert the identification of beneficial ownership from a declarative obligation into a structured system of registration and verification.

This gap is partially addressed by **Law No. 08/L-265 on the Register of Beneficial Owners**, which establishes a detailed definition of the beneficial owner as the natural person who exercises ultimate effective control over a legal entity, whether through direct or indirect ownership or other means of control.

This law applies to both commercial companies and non-governmental organizations, including those operating as media outlets, and is administered by the Kosovo Business Registration Agency (KBRA) and the Department for NGOs.

However, this regime remains horizontal and primarily oriented toward the objectives of preventing money laundering and terrorist financing. In practice, it is not integrated into the sectoral oversight of the Independent Media Commission (IMC), which means that data on beneficial owners is not systematically used to assess the real concentration of media ownership.

In comparison to this approach, the European Media Freedom Act (EMFA) establishes a significantly more advanced standard by treating ownership transparency and the prevention of concentration as essential conditions for editorial independence. EMFA requires not only formal declarations but also effective public access to data on real owners and the main sources of financing, as well as functional cooperation between sectoral regulators and horizontal registers.

In this regard, Kosovo's framework remains fragmented and primarily oriented toward administrative control, without yet reaching the level of substantive transparency and institutional integration required by European standards.

In summary, Kosovo has established a broad legal foundation for regulating media ownership and preventing concentration, but the effectiveness of this framework remains limited due to its focus on formal declarations and the absence of substantive verification of real economic and editorial control.

The IMC Regulation on Ownership and Concentration of Licensees represents a necessary instrument for transparency and pluralism; however, without a functional link to mechanisms for identifying beneficial owners and without systematic use of existing data, it does not effectively limit hidden forms of concentration.

Horizontal laws on beneficial ownership provide the foundation for identifying real control, yet this potential has not yet been fully utilized within sectoral media oversight. In order to guarantee real pluralism, editorial independence, and the quality of information, a coordinated approach is required, one that strengthens the verification of real ownership, connects the IMC's oversight with the Register of Beneficial Owners, and ensures meaningful public access to data on real owners and the main sources of financing, in line with European standards of media freedom and transparency.

## Transparency of media financing and the advertising market

Beyond the formal structures of ownership, the real influence on the editorial independence of media is largely materialized through the way they are financed.

In practice, the advertising market constitutes the main mechanism through which economic power can exert direct or indirect influence over editorial orientation, the selection of content, and the positioning of media outlets in relation to political and economic interests.

For this reason, transparency in financing through advertising represents a key element for assessing editorial autonomy and the real functioning of media pluralism.

In Kosovo, advertising constitutes the dominant

source of revenue for the majority of audiovisual media outlets. Influence exercised through this market is usually less visible than ownership control, as it operates through contractual relationships, sponsorships, institutional advertising, and other forms of commercial communication.

This makes the regulation of the advertising market and the level of transparency it produces even more important, not only from the perspective of protecting audiences but also from the perspective of the financial influence exerted on media content.

Within the existing legal framework, the regulation of commercial communications derives from the competencies of the Independent Media Commission (IMC) in overseeing audiovisual activities and the functioning of the media market.

*Law No. 04/L-44 on the Independent Media Commission* authorizes the IMC, through licensing conditions and secondary legislation, to regulate advertising, sponsorship, teleshopping, and other forms of commercial communication as integral parts of media activity (Article 3, paragraph 2; Article 28).

In this sense, commercial communications are not treated merely as an economic activity, but as an element with a direct impact on the public interest and the integrity of the media.

These competencies are operationalized through the *IMC Regulation on Audio and Audiovisual Commercial Communications*, which constitutes the main secondary legal instrument regulating the form and content of advertising in the audiovisual sector.

The Regulation establishes the obligation that commercial communications must be clearly identifiable and separated from editorial content, prohibits hidden and misleading advertising, and regulates in detail sponsorship, product placement, and teleshopping (provisions on the identification of commercial communications and the prohibition of hidden advertising).

In particular, it prohibits any interference by sponsors in editorial content and requires clear disclosure of sponsorship relationships to the public (provisions on sponsorship).

Compliance with these rules is monitored through the supervisory and sanctioning powers of the IMC throughout the entire period of license validity.

However, although this regulation is detailed in regulating the form and ethics of commercial communication, it does not produce sufficient transparency regarding the financial relationships underlying the advertising market.

The current framework does not establish obligations for the publication of data on revenues from advertising and sponsorships, does not require the disclosure of major advertisers or the relative share of institutional advertising, and does not provide mechanisms for identifying the financial dependence of media outlets on specific advertising sources.

As a result, the regulation remains primarily oriented toward protecting audiences and ensuring ethical standards in content, without substantively addressing the dimension of financial influence.

In addition to this content-related regulation, the IMC's secondary legal framework also includes direct structural limitations within the audiovisual marketing and advertising market, which are linked to preventing economic dominance and disproportionate financial influence over media outlets.

*The IMC Regulation on Ownership and Concentration of Licensees* treats the advertising market as an important factor of economic control over editorial independence and establishes clear limits on the concentration of advertising revenues.

Explicitly, the regulation prohibits a license holder from receiving or broadcasting more than 30% of the total value of the audiovisual commercial communications market, thereby establishing a legal ceiling on financial dominance through advertising (Article 4, paragraph 10).

This provision aims to prevent the concentration of advertising revenues in a limited number of media outlets and to reduce the risk that financial power generated through marketing translates into disproportionate editorial influence over media content.

In the same spirit, the regulation limits ownership links between audiovisual media and entities in the advertising sector, allowing advertising agencies or persons connected to them to hold shares in generalist media outlets only up to a maximum of 10% of ownership (Article 4, paragraph 7).

This restriction seeks to avoid conflicts of interest and indirect control of media through the marketing chain, the distribution of advertising budgets, and economic influence over editorial policies.

However, even these structural limitations are not accompanied by detailed mechanisms for public transparency of the advertising market.

The regulation does not establish obligations for the public reporting of advertising revenues, does not require the disclosure of major advertisers including public institutions, and does not create an integrated database that would enable the assessment of the financial dependence of media outlets on specific advertising sources.

As a result, the control of financial concentration remains largely administrative and oriented toward licensing, without being transformed into real and verifiable transparency for the public.

Within this regulatory configuration, transparency of the advertising market remains the least developed element of the overall framework of media transparency in Kosovo.

Without structured reporting, without public access to data on financing through advertising, and without functional links between content-related oversight and financial oversight, the real economic influence over media remains difficult to identify and assess.

Strengthening transparency in this field, therefore, constitutes a necessary condition for the effective guarantee of media pluralism and editorial integrity.

Although the regulatory framework establishes clear normative limitations on financial influence through advertising, the manner in which these limitations translate into concrete measurement and market monitoring remains unclear.

With regard to transparency in financing through the advertising market, the *IMC Regulation on Ownership and Concentration of Licensees* does not establish a clear mechanism for measuring the audiovisual advertising market as an economic whole. It does not define a methodology for calculating the overall market value, the sources of data on advertising revenues, or standardized indicators for assessing the participation of individual media outlets in this market.

As a result, the formal restrictions placed on financial dominance through advertising are not accompanied by verifiable and comparable criteria that would enable substantive implementation and effective ongoing monitoring.

Likewise, the regulation does not provide obligations for specific periodic financial reporting on advertising revenues, nor mechanisms for auditing or independent verification of the reported data.

The oversight exercised by the Independent Media Commission (IMC) remains largely based on declarations submitted by licensed entities and on case-by-case interventions, without a structured system for continuous monitoring of the advertising market and without a consolidated overview of the real distribution of financial power within the sector.

In this context, the Regulation addresses concentration primarily from a normative perspective, rather than from an empirical and analytical market perspective. This limits the regulator's ability to identify financial dependencies, indirect dominance, or the use of advertising particularly public advertising as an instrument of influence.

Compared with the standards of the *European Media Freedom Act (EMFA)*, which require measurable transparency, public access to data, and systematic monitoring of media financing, the current framework does not provide the necessary basis for an informed assessment of the real economic influence on editorial independence.

## Comparison with the European Framework – the European Media Freedom Act and the AVMS Directive

The European framework for media freedom and pluralism is currently based on two central normative instruments which, although different in function and regulatory intensity, operate in a complementary manner: the *Audiovisual Media Services Directive (AVMSD)* and the *European Media Freedom Act (EMFA)*.

While the AVMSD represents the traditional basis for sectoral audiovisual regulation in the European Union, the EMFA marks a new phase of European intervention by directly addressing structural issues related to media ownership, financing, and editorial independence.

The AVMSD is designed as an instrument of minimum standards. It does not aim to harmonize rules on media ownership or concentration but establishes the basic framework for the functioning of the audiovisual market through the guarantee of independence for regulatory authorities, the clear separation between editorial content and commercial communications, and the protection of the public interest and pluralism through content regulation.

In this sense, pluralism is treated mainly as an institutional and procedural matter, while the regulation of ownership and concentration is left to the member states in accordance with their national realities. For Kosovo, the relevance of the AVMSD is particularly linked to the standard of regulatory independence, which has been problematic in recent legal developments related to the Independent Media Commission (IMC).

In contrast to this approach, the EMFA represents a clear shift from general principles toward substantive mechanisms. The EMFA intervenes precisely in those areas where domestic frameworks—including Kosovo’s framework—remain limited, like real transparency of ownership, control of media concentration, and the influence of financing, particularly state advertising, on editorial independence.

The EMFA requires that media ownership should not only be reported to regulators, but should be publicly accessible, including information on beneficial owners and control structures.

It also directly links economic concentration with risks to pluralism and democratic functioning, requiring substantive assessments before the approval of major media concentrations. A particularly important element is the transparency of state advertising, which is treated as a potential instrument of political influence over the media rather than merely as an economic activity.

Compared with this framework, regulation in Kosovo provides a functional basis but with noticeable limitations. In the field of media ownership, Kosovo has established a declarative and supervisory regime through the Independent Media Commission (IMC) and its secondary legislation. It has not, however, translated this into fully transparent public reporting, nor has it established a substantive

test for effective control. The EMFA, by contrast, considers public access to ownership information a precondition for the real exercise of freedom of expression by the public.

Similarly, in terms of ownership concentration, the IMC regulation relies mainly on formal limitations and numerical thresholds, without mechanisms for assessing the impact on the market and on editorial content. The EMFA expands this approach by treating concentration not only as a matter of competition but as a systemic risk to pluralism and democracy.

In the areas of financing and advertising, Kosovo has intervened mainly through regulating the form of commercial communications and structural limitations, but without establishing obligations for transparency of financial sources, the share of state advertising, or the economic dependence of media outlets. The EMFA directly addresses this gap by treating the transparency of public advertising as a fundamental element for protecting editorial independence.

Regarding the role of the regulator, both the AVMSD and the EMFA establish high standards for institutional independence and protection from political interference. Compared with these standards, Kosovo’s main challenge relates, not only to the normative framework itself, but also to the manner in which it is implemented, without undermining the functional autonomy of the IMC.

Thus, in the context of this document, the EMFA does not represent the only comparative reference, but rather the main strategic reference for Kosovo. The EMFA provides concrete and measurable standards, is directly linked to the European integration process, and specifically addresses the gaps that appear in the domestic framework concerning media ownership, financing, and advertising. The AVMSD remains relevant as a minimum sectoral standard, while other European instruments complement the overall framework without replacing the EMFA in structural terms.

In summary, comparison with the European framework shows that Kosovo has established a functional regulatory regime on paper, but has not yet fully transitioned toward substantive transparency and the real assessment of economic and political influence over media.

Gradual harmonization with the EMFA is, therefore, an obligation for EU integration, but also as a practical instrument for strengthening pluralism, editorial independence, and public trust in the media.

## FUNDING OF ONLINE PLATFORMS

Online media outlets operating in Kosovo are registered with the Kosovo Business Registration Agency (KBRA) and declare their revenues to the Tax Administration of Kosovo (TAK). Research revealed that the main activities conducted within the country such as advertising and sponsored content are subject to domestic revenue reporting. However, significant challenges arise in addressing revenues generated from ads and advertising on social media platforms.

The research has shown that Google does support Albanian language content for monetization and does not allow monetization from the territory of Kosovo. Similarly, platforms, such as those owned by Meta, as well as YouTube and TikTok, do not allow monetization from Kosovo. In order to create opportunities for revenue generation, media outlets and social media platforms have relocated their addresses to countries where monetization is permitted.

Data collected from interviews with social media managers indicate that some platforms have been registered in the United States, others in EU countries, and some in third countries from which the monetization process is carried out.

Within Kosovo, there is no mechanism that would inform the public about the revenues generated from these platforms or about the system through which such revenues are taxed by the authorities of the countries where the platforms are formally based.

# AN UNCERTAIN STRATEGY FOR ADDRESSING DISINFORMATION

In addition to the legal framework and the challenges of transparency in media financing, serious ambiguities are also observed within the country regarding the treatment of disinformation by public institutions.

European standards, as well as good practices in the region, promote the development of strategic plans to address disinformation.

At the national level, Kosovo still does not have a comprehensive national strategy against disinformation, nor a clear and comprehensive plan for addressing this phenomenon. The absence of any such strategic document makes it difficult to coordinate actions among public institutions, media organizations, and other actors in society.

Without this strategy, institutions lack a common operational framework for identifying, preventing, and responding to disinformation. This creates a situation in which institutional responsibilities remain unclear, and responses to disinformation campaigns are often sporadic and uncoordinated.

As a consequence of the absence of a national strategy, public institutions and media organizations do not have clearly defined duties and responsibilities for addressing disinformation. In many cases, the issue of disinformation is not treated as part of the institutional mandate but remains a general challenge that does not fall directly under the responsibility of any specific structure.

This situation contributes to a lack of institutional coordination and delayed responses to cases involving the spread of false information. Institutions often react only after disinformation has already spread widely and influenced public opinion.

## LACK OF PROFESSIONAL CAPACITIES

One of the main challenges in Kosovo relates to the lack of professional training for public officials in identifying and addressing disinformation. Officials in most institutions are not trained to identify the sources of disinformation and do not possess the necessary knowledge to analyze the ways in which it spreads.

Moreover, institutions have not developed clear strategies for preventing and managing the spread of disinformation. This creates a significant gap in institutional capacities to confront this phenomenon, especially at a time when information circulates rapidly across digital platforms.

Another identified problem is that the majority of public officials who work in communication with the media and the public do not have the treatment of disinformation included in their job descriptions. This means that combating disinformation is not considered part of their institutional responsibilities.

As a result, institutions lack specialized structures or designated individuals responsible for monitoring and responding to false or manipulative content circulating in the public sphere and on social networks.

Challenges are also evident in the management of official communication channels owned by public institutions on social media. Currently, Kosovo does not have a legal regulatory framework governing the presence of public institutions on social media platforms such as Facebook, TikTok, or other networks.

Consequently, the presence of institutions on these platforms is often uncoordinated and lacks clear professional standards. Institutions use social networks in different ways, without a unified communication policy and without clear guidelines for content management and responding to disinformation.

Another important challenge relates to the lack of structured communication and cooperation

between Kosovo's institutions and major social media platforms. Institutions have not succeeded in establishing rapid and effective mechanisms for reporting and removing harmful or false content.

This situation makes it more difficult to respond to the spread of disinformation, as reporting and content removal processes are often slow and not always effective.

Within the country, there is no centralized mechanism that would collect, analyze, and assess harmful content circulating in the digital space. The absence of such a structure makes the systematic identification of disinformation campaigns more difficult.

Meanwhile, judicial procedures for addressing such cases are often lengthy and not always effective. Due to the time required for court proceedings, many cases of disinformation remain unaddressed at the appropriate time.

The collected data show that a large portion of officials working in the field of institutional communication do not use digital platforms and tools to track disinformation. This indicates a lack of technological and professional capacities for monitoring the online environment.

Without the use of advanced tools for analyzing digital content, institutions remain limited in their ability to identify and respond in a timely manner to disinformation campaigns.

These findings lead to the conclusion that the country lacks a clear overarching institutional strategy on how to address and manage disinformation.

# RECOMMENDATIONS

Based on this analysis, the institutions of Kosovo are recommended to undertake the following steps:

The Government of Kosovo should initiate an interinstitutional working group to draft a concept document on the necessary legal changes that would ensure the harmonization of national legislation with EU standards in the field of disinformation.

The Government of Kosovo should establish an interinstitutional working group to prepare a concept document on the necessary legislative changes to guarantee transparency in media financing.

The Government of Kosovo, independent institutions, and the Assembly of Kosovo should undertake concrete measures to propose and amend laws affecting media financing transparency and to strengthen institutional capacities to address disinformation.

In order to prevent the use of public funds as an instrument of influence over media, the Assembly should consider adopting a dedicated law on state advertising. This law should guarantee full transparency regarding public spending on advertising, the criteria for its allocation, and the beneficiaries, in line with the standards set out in the EMFA. A framework of this kind would reduce the risk of political favoritism and ensure fair competition in the advertising market.

At the national level, the Assembly of Kosovo and the Government of Kosovo should work closely to develop a national strategy against disinformation that would address coordination and concrete actions in the field of combating disinformation.

The Assembly of Kosovo, the Government of Kosovo, and independent institutions should ensure adequate funding for concrete activities aimed at preventing and addressing disinformation.

Within public institutions, technological and professional capacities should be strengthened to guarantee effective monitoring and response to disinformation.

Kosovo's institutions should intensify their efforts to establish cooperation with digital platforms in order to ensure the recognition of the Albanian language by these platforms.

Kosovo's institutions should increase their efforts to secure a dedicated internet country domain (URL domain) for Kosovo in order to facilitate easier monitoring of the country's online presence.

The Assembly should strengthen its supervisory role by requiring periodic reports from the IMC on media ownership, concentration, and pluralism. It should also request regular reporting on the implementation of the Law on the Register of Beneficial Owners in the media sector, ensuring that declarative obligations are transformed into real transparency.

The IMC should develop internal capacities for periodic analysis of the media market, including the assessment of economic concentration and the influence of financing on editorial content. Annual reports on pluralism and ownership should be transformed into practical instruments for policymaking and parliamentary oversight.



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