

DEFUNDING DISINFORMATION IN THE BALKANS

How International Brands
Support Russia's Agenda

by BFMI & CRTA

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BFMI

CRTA

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EXECUTIVE SUMMARY

Advertising revenues from global brands are a key source of funding for outlets spreading disinformation on Russia's invasion of Ukraine and other divisive issues in the Balkan media. Global brands and advertising agencies placing ads in such outlets risk strengthening Russian influence and contributing to the declining information environment in a politically fragile region.

This report examines advertising spending and practices in Serbia and Bulgaria, two Balkan states at a critical junction between European democracy and authoritarianism. Analysis of advertising data shows that major global brands are spending hundreds of millions of euros on advertising with outlets in the Balkans that spread disinformation on topics including:

- Kremlin narratives linked to the invasion of Ukraine;
- malign government propaganda;
- attacks on civil society, independent media, and political opposition; and
- narratives undermining democratic values.

Advertising serves as the leading source of revenue for media companies globally. In the Balkans, government control over the media is a growing issue and advertising revenues from global brands could offer a lifeline to independent outlets which do not receive government support. However, this report finds that current advertising practices often prioritise outlets that are highly sympathetic to the government spreading disinformation, exacerbating existing problems.

This report finds that this issue is particularly acute in Serbia, an EU accession candidate and, according to the European Parliament, the launchpad of Russian disinformation in the region. In 2022, 64% of advertising spending in the country came from global brands. This report shines a light on how commonplace disinformation is across the country's mainstream media. Two of the most popular national Serbian TV stations – TV Pink and TV Happy – regularly propagate the unfounded claim that “Russia was forced” into conducting a “special military operation” in Ukraine and likened NATO to an “apocalyptic group of anti-Russian crusaders.” These stations collectively receive over half of the country's total advertising expenditure.

In Bulgaria, an EU member state, disinformation narratives are found to be less common in broadcast media but widely spread online in digital media. This includes some of the country's most popular news websites, which regularly promote pro-Kremlin disinformation, claiming that NATO is using Ukraine to fight Russia, that Bulgaria will be forced to join the conflict, and that Ukrainian refugees are exploiting host countries.

The purpose of this report is to alert global brands concerned with brand safety, and the advertising companies that represent them, to the fact that they may be unwittingly funding disinformation in the region. This report calls on policymakers, civil society and the private sector to take concrete steps to ensure corporate advertising strategies strengthen independent media and democracy in the region.

Recommendations:

- Global brands: review ethical advertising policies and relationships with advertising companies, conduct enhanced due diligence on media outlets, and support trustworthy sources through advertising.
- Advertising companies: conduct enhanced due diligence on media outlets, review and revise publisher policies, and block advertising placement on websites, platforms, and services in violation.
- Civil society: foster greater engagement with the private sector to facilitate investment in credible media.
- Policymakers: hold governments accountable for declining media freedom and promote transparency and accountability in the media sector.

The Balkan region is at a crossroads between integration with the European Union and forming closer ties with authoritarian states such as Russia. In this context, an independent media is of vital importance, but media freedoms are declining rapidly in the region due to government interference. Global brands and advertising companies have an important responsibility to ensure their investments in the Balkans do not contribute to the further erosion of media freedom, stability and democracy in the region.

INTRODUCTION

Disinformation is on the rise in the Balkans.¹ In a region with declining media freedom, false narratives and propaganda are widespread on both digital and traditional media.² The South East European Network for the Professionalization of Media warns that no matter where you live in the region, “you are exposed to large volumes of disinformation that may shape your attitudes towards health, politics or public safety.”³

This poses genuine risks to stability and democracy, particularly given the role of disinformation in fuelling tension and violence in multi-ethnic communities in the Balkans, as seen in Kosovo and Bosnia and Herzegovina. The severity of this situation has been further exacerbated by Russia’s full-scale invasion of Ukraine, which has seen a flood of pro-Kremlin disinformation narratives enter the information environment of the Balkans.⁴

A growing area of interest from policymakers and researchers tackling these issues is the demonetisation of disinformation. An identified approach to reduce financial incentives to disinform involves ensuring that outlets spreading disinformation are not able to profit from advertising revenues. This report builds on research in this area, especially on the role of digital advertising, to examine how advertising provides funding to outlets spreading disinformation in the Balkan region.⁵

In particular, the report examines the cases of Serbia and Bulgaria, two Balkan states at a critical junction between European democracy and authoritarianism. Analysis of advertising data for 2022 shows that major global brands are spending hundreds of millions of euros on advertising with outlets in these countries that spread disinformation on topics including:

- **Kremlin narratives linked to the invasion of Ukraine;**
- **malign government propaganda;**
- **attacks on civil society, independent media, and political opposition; and**
- **narratives undermining democratic values**



Front page of the most popular tabloid in Serbia on February 22, 2022 - two days before the invasion of Ukraine.

In Serbia, the subject of Chapter One, disinformation is found to be predominantly spread through traditional media, including leading TV stations and newspapers, which receive significant advertising revenues from global brands.

In Bulgaria, the subject of Chapter Two, disinformation is less of an issue in mainstream media and is instead promoted more widely through digital media. However, again, major global brands are found to advertise on outlets spreading disinformation through digital advertising.

The authors contacted all of the companies whose advertising record is featured in the text in this report. None of their responses contradicted the data we are reporting. The companies gave a variety of explanations for their behaviour - from following accepted commercial practice in maximising reach to deferring to local representatives. Wherever we have received a substantive response from a named company the key points from their statements are referred to in the appendix. Where no response is annotated it should be assumed that the company did not respond or declined the request for comment.

ADVERTISING IN THE MEDIA

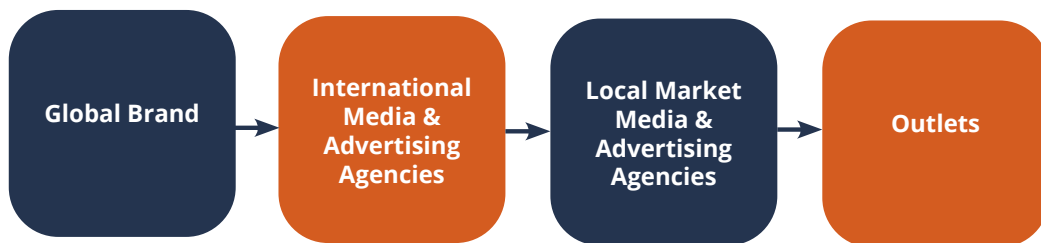
To understand exactly how advertising revenue is funding disinformation in the Balkans, and how it may be redirected to support trusted media partners, it is crucial to understand the supply chain of advertising in the media. Global brands spend billions on advertising to drive sales, increase brand awareness and, ultimately, to create value. This advertising spending serves as the leading source of revenue for media companies globally, with total advertising revenue estimated at \$808 billion in 2022⁶ and projected to surpass one trillion US dollars by 2026.⁷ This revenue is often crucial for the survival and success of outlets, particularly in underdeveloped media markets such as in the Balkans, where outlets compete for limited funding.

However, there are numerous actors involved between global brands deciding to market their products and the consumer being exposed to an advertisement in the media. This supply chain often lacks transparency, resulting in brands having limited control or knowledge of where their advertisements are being distributed.

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1. Unkic, H. (2023), 'Fighting a Flood of Disinformation in the Western Balkans,' SEENPM, 13 March 2023, <https://seenpm.org/fighting-a-flood-of-disinformation-in-the-western-balkans/>. (Accessed 27 Oct 2023).
 2. Reporters Without Borders (2021), 'Press Freedom Should Be High on EU-Balkans Summit Agenda, Says RSF,' <https://rsf.org/en/press-freedom-should-be-high-eu-balkans-summit-agenda-says-rsf>. (Accessed 27 Oct 2023).
 3. Unkic, H. (2023), 'Fighting a Flood of Disinformation in the Western Balkans,' SEENPM, 13 March 2023, <https://seenpm.org/fighting-a-flood-of-disinformation-in-the-western-balkans/>. (Accessed 27 Oct 2023).
 4. Radio Free Europe (2023), 'U.S. Envoy Warns about Russian Efforts to Use Disinformation to Divide U.S. Allies in Balkans,' <https://www.rferl.org/a/russia-disinformation-divide-us-allies-balkans/32439762.html>. (Accessed October 27, 2023).
 5. Atkin, C. (2023), 'Are Your Ads Funding Disinformation?', Harvard Business Review, 21 August 2023, <https://hbr.org/2023/08/are-your-ads-funding-disinformation>. (Accessed 27 Oct 2023).
 6. 'Advertising media owners' revenue worldwide from 2018 to 2028 (in billion U.S. dollars),' Statista, <https://www.statista.com/statistics/236943/global-advertising-spending/#statisticContainer>. (Accessed 27 Oct 2023).
 7. Sales Force (2023), 'New Report: Media & Entertainment Industry Seeks New Revenue Sources as 64% Predict Flat or Lowered Ad Spend,' Salesforce, 23 March 2023, <https://www.salesforce.com/news/stories/media-trends/#:-:text=Advertising%20remains%20the%20leading%20source>. (Accessed 27 Oct 2023).

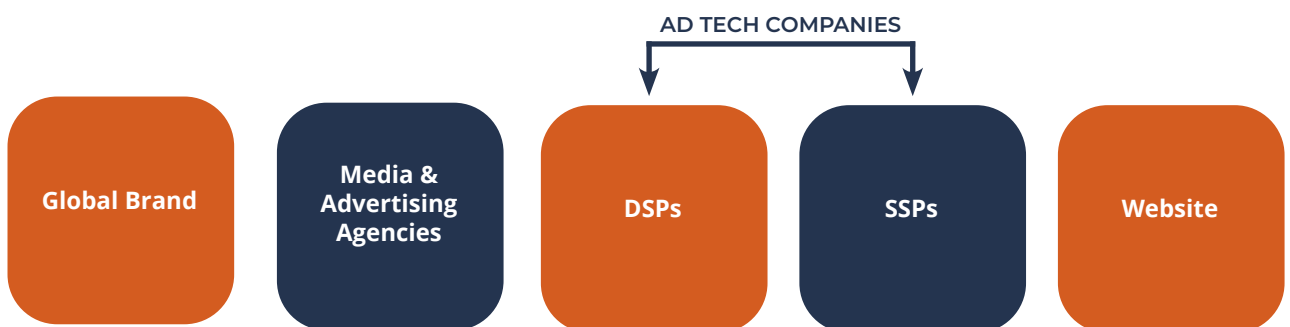
In traditional print and broadcast media, global brands typically entrust media and advertising agencies with the placement of ads in TV and newspapers. These agencies advise or decide which outlets the brands advertise with, largely based on their budget and target audience. In smaller markets, such as those in the Balkan countries, a brand's main agency often subcontracts to a local agency to place advertising on local TV and print media. The involvement of multiple steps in this process creates an opaque system that can lead to a lack of awareness among brands, and even major advertising agencies, about the media outlets profiting from their advertising campaigns.

Traditional Print and TV Advertising Supply Chain



In online media, global brands have even less control over their advertising. Here, brands and their media and advertising agencies place ads through programmatic advertising – a system run by ad tech companies that relies on algorithms to place ads using an automated auction process, involving minimal human supervision. This complex supply chain involves multiple layers and intermediaries, including a demand-side platform (DSP) that brings advertisers to market and a supply-side platform (SSP) that brings publishers to market, and ad tech companies that serve as brokers.

Online Programmatic Advertising Supply Chain



As noted by NewsGuard, an organisation which has developed trust ratings for more than 7,500 news and information websites, programmatic advertising allows ad tech companies “to promise advertisers (brands) that they can target specific audiences with specific demographics at the lowest available price. Often left out of the process is any consideration of the nature of the website where the ad lands.”⁸ Check My Ads Institute finds that “the reality of too many opaque business relationships has led to disinformation outlets being pulled into the system,” as intermediary platforms often turn a blind eye and allow websites to connect to the advertising supply chain without any human review.⁹

(DE)MONETISING DISINFORMATION

This fragmented supply chain and subsequent lack of oversight leaves global brands open to the risk of unknowingly advertising in outlets spreading disinformation. A joint analysis by NewsGuard and Comscore found that major global brands are sending \$2.6 billion to misinformation websites each year.¹⁰ The Global Disinformation Index has similarly found that millions in estimated advertising revenue are being sent to outlets that publish disinformation, including false health claims and anti-vaccine myths,¹¹ election misinformation,¹² Russian propaganda,¹³ and other forms of false news worldwide. The European Commission’s 2022 Strengthened Code of Practice on Disinformation identifies that “better cooperation” across the supply chain is needed to “ensure that ad placements are scrutinised more effectively.”¹⁴

Allowing ads to feature on such outlets represents a threefold threat, according to Check My Ads Institute.¹⁵ Firstly, as outlined above, it monetises disinformation. Secondly, it enables malign actors to gain knowledge of their audience and further target them with falsehoods. Thirdly, ads from well-known brands send signals of legitimacy to viewers of the disinformation.

Global brands are increasingly aware of the risks of advertising for brand safety and in some cases, are removing advertising from platforms on ethical grounds. For example, Elon Musk’s “general amnesty” in November 2022 for previously banned users on X (formerly Twitter) prompted a substantial exodus of advertisers, citing the propagation of hate speech and misinformation as the primary reason.¹⁶ Likewise, after the Check My Ads Institute initiated a campaign to alert brands about their ads funding War Room, an online blog founded by Steve Bannon and known for regularly promoting disinformation, major advertisers promptly responded by taking action and withdrawing their ads.¹⁷

8. Roache, M., Sadeghi, M., n.d. “Another Tech ‘Innovation’ With Unintended Consequences,” NewsGuard, <https://www.newsguardtech.com/special-reports/russian-disinformation-programmatic-advertising/> (Accessed 27 Oct 2023).

9. Atkin, C. (2023), ‘Are Your Ads Funding Disinformation?’, Harvard Business Review, 21 August 2023, <https://hbr.org/2023/08/are-your-ads-funding-disinformation>. (Accessed 27 Oct 2023).

10. Skibinski, M., n.d., ‘Review of Special Report: Top Brands Are Sending \$2.6 Billion to Misinformation Websites Each Year,’ NewsGuard, <https://www.newsguardtech.com/special-reports/brands-send-billions-to-misinformation-websites-newsguard-comscore-report/>. (Accessed 27 Oct 2023).

11. Alfonsi, C., Cece F., Matasick C., (2021), ‘Disinformation Amidst a Global Pandemic: A Call to Action,’ Global Disinformation Index, 10 May 2021, <https://www.disinformationindex.org/blog/2021-5-10-disinformation-amidst-a-global-pandemic-a-call-to-action/>. (Accessed 27 Oct 2023).

12. Global Disinformation Index, (2022), ‘Ad-funded Elections Integrity Disinformation,’ Global Disinformation Index, 08 November 2022, <https://www.disinformationindex.org/research/2022-11-08-ad-funded-elections-integrity-disinformation/>. (Accessed 27 Oct 2023).

13. Global Disinformation Index, (2022), ‘Ukraine Conflict Series: ad-funded disinformation, corporate responsibility and policy solutions (Report 5),’ Global Disinformation Index, 25 May 2022, <https://www.disinformationindex.org/disinfo-ads/2022-05-25-ukraine-conflict-series-ad-funded-disinformation-corporate-responsibility-and-policy-solutions-report-5/>. (Accessed Oct 27, 2023).

14. European Union: European Commission (2022), ‘Questions and Answers: Strengthened Code of Practice on disinformation,’ 16 June 2022, https://ec.europa.eu/commission/presscorner/detail/en/QANDA_22_3665. (Accessed 27 Oct 2023).

15. Atkin, C. (2023), ‘Are Your Ads Funding Disinformation?’, Harvard Business Review, 21 August 2023, <https://hbr.org/2023/08/are-your-ads-funding-disinformation>. (Accessed 27 Oct 2023).

16. Duffy, C. (2023), ‘More than Half of Twitter’s Top 1,000 Advertisers Stopped Spending on Platform, Data Show,’ CNN, 10 February 2023, <https://edition.cnn.com/2023/02/10/tech/twitter-top-advertiser-decline/index.html>. (Accessed 27 Oct 2023).

17. Thalen, M. (2022), ‘Ad Tech Watchdog Petitions 8 Companies to Stop Advertising on Steve Bannon’s War Room,’ The Daily Dot, 22 September 2022, <https://www.dailydot.com/debug/check-my-ads-steve-bannon-war-room/>. (Accessed 27 Oct 2023).

Attention towards ethical advertising gained traction following the invasion of Ukraine when leading advertising platforms halted their services to Russian state media and ceased the delivery of ads to users in Russia. Many individual companies responded to the invasion; for example, Procter & Gamble announced the suspension of all media, advertising and promotional activity across Russian channels.¹⁸ Google, the world's leading ad tech provider, also updated its publisher policy to pause advertising on "content that exploits, dismisses, or condones the war."¹⁹ However, in practice, due to the opaque nature of advertising markets and a lack of curiosity and due diligence throughout the advertising value chain, global brands are still advertising with outlets spreading disinformation, often in contradiction to their own policies and industry-wide ethical guidelines.

Global brands advertising in the Balkans, a region where the Kremlin is actively trying to sow discord, must ensure they are not funding outlets spreading disinformation. The objective of this report is to alert policymakers, Balkan observers, and global brands to this issue, and to provide recommendations to ensure advertising revenues are used to strengthen the information environment in the region by limiting funding for disinformation and supporting credible independent media.

18. 'Procter & Gamble.', Leave-Russia.org, <https://leave-russia.org/procter-gamble>. (Accessed Oct 27, 2023).

19. Google (2022) 'Google Publisher Policies - Google Ad Manager Help,' <https://support.google.com/admanager/answer/10502938?hl=en>. (Accessed 27 Oct, 2023).

CHAPTER ONE



DEFUNDING DISINFORMATION IN MAINSTREAM MEDIA: THE CASE OF SERBIA

According to a study by the European Parliament, Serbia serves as a “launchpad for Russian disinformation operations in the Western Balkans.”²⁰ Reporters Without Borders (RSF) notes that Serbia is a country “with weak institutions that are prey to fake news spread by government-backed sensational media.”²¹ Under President Aleksandar Vučić, a former information minister during the Milošević era, media freedom in Serbia has experienced a significant decline. In the RSF’s Press Freedom Index 2023, Serbia dropped twelve positions, the largest decline in the EU and Balkans region, and currently ranks 91st out of 180 countries.

Despite being a candidate for EU membership, Serbia maintains a strong relationship with Russia and stands among the few European nations not enforcing sanctions against Russia since the full-scale invasion of Ukraine. Kremlin disinformation is pervasive within the Serbian information ecosystem, aligning closely with the government’s pro-Russia stance.²² This disinformation often originates in Serbia from a false or misleading statement made by a political figure, including members of the government and Kremlin spokespeople, which is then promoted by local media.²³ The vast majority of the mainstream media in Serbia portrays Russia very positively, often contrasting it favourably against the EU. This message is amplified by Kremlin-sponsored outlets such as Sputnik and Russia Today (RT) which continue to operate in Serbia despite widespread bans across Europe.²⁴ Unsurprisingly, most of the Serbian population holds a positive view of Vladimir Putin, according to recent polling.²⁵

These factors contribute to a media market where disinformation is widespread on the country’s most popular TV stations and print tabloids, which are the main source of news for Serbians and the focus of this research.

20. Greene, S., Asmolov, G., Fagan, A., Fridman, O., Gzuvelov, B. (2021), ‘Mapping Fake News and Disinformation in the Western Balkans and Identifying Ways to Effectively Counter Them,’ European Parliament: Policy Department for External Relations, 23 Feb 2021, [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO_STU\(2020\)653621_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/653621/EXPO_STU(2020)653621_EN.pdf) (Accessed 27 Oct 2023).

21. Reporters Without Borders (2023), ‘Serbia,’ <https://rsf.org/en/serbia>. (Accessed Oct 27, 2023).

22. Hoxhaj, A., n.d, ‘Ukraine War: Serbia Is Shifting Closer to Russia – Here’s Why,’ The Conversation, 07 November 2022, <https://theconversation.com/ukraine-war-serbia-is-shifting-closer-to-russia-heres-why-192472>. (Accessed 27 Oct 2023).

23. ‘Social Media and the Information War in the Balkans,’ Balkan Free Media Initiative, March 2022, <https://static1.squarespace.com/static/607edb92071ad0422f427dcb/t/624414f9e92d772d1859b723/1648628995459/BFMI+Social+Media+Report.pdf> (Accessed 27 Oct 2023).

24. European Council: Council of the European Union (2022), ‘EU imposes sanctions on state-owned outlets RT/Russia Today and Sputnik’s broadcasting in the EU,’ 02 March 2022, <https://www.consilium.europa.eu/en/press/press-releases/2022/03/02/eu-imposes-sanctions-on-state-owned-outlets-rt-russia-today-and-sputnik-s-broadcasting-in-the-eu/>. (Accessed 27 Oct, 2023).

25. Hoxhaj, A., n.d, ‘Ukraine War: Serbia Is Shifting Closer to Russia – Here’s Why,’ The Conversation, 07 November 2022, <https://theconversation.com/ukraine-war-serbia-is-shifting-closer-to-russia-heres-why-192472>. (Accessed 27 Oct 2023).

THE SERBIAN ADVERTISING MARKET

In Serbia, advertising, especially from non-Serbian brands, is a crucial source of funding for media. According to the market analysis firm Nielsen, €1.02 billion was spent on advertising in Serbia's five main TV channels with national free-to-air licences (i.e. accessible to the population for free) and 11 largest newspapers in 2022. However, it is important to note that the advertising total is for the full-rate card, i.e. contracts with no discounts. Discounts – sometimes up to 60% – on the full-rate card figures are standard in advertising contracts, so the real figure is likely to be lower.

SERBIA OUTLETS TRACKED BY NIELSEN

Type	Name
TV Channels with free-to-air licences	RTS, TV Pink, TV Happy, Prva, B92
Print Dailies	Blic, Večernje novosti, Informer, Alo!, Srpski telegraf, Politika, Kurir, Objektiv, Nova, Danas

As legacy media in a highly controlled market, all of the media analysed by Nielsen, with the exceptions of Nova and Danas,²⁶ are highly sympathetic to the government in their reporting and were found to publish disinformation. As identified by BFMI's earlier report on media ownership in the Balkans, many of these problematic media outlets have links to the ruling party and state.²⁷

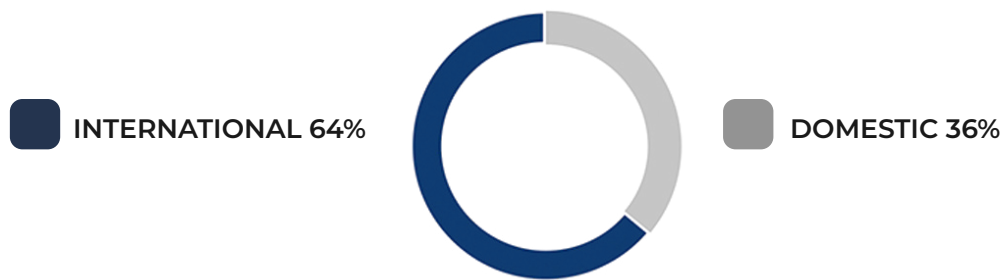
According to Nielsen's advertising data for 2022, TV massively dominated spending with €989.6 million dedicated to those five television stations, and only €31.4 million allocated to the print titles.²⁸ Roughly €653.1 million of the total advertising expenditure came from companies outside of Serbia, while €367.9 million was spent by domestic sources.

26. Nova and Danas are owned by the Netherlands-based telecoms company United Group, which operates some of the few media outlets in Serbia that are critical of the government.

27. 'The Invisible Hand of Media Censorship in the Balkans,' Balkan Free Media Initiative, October 2021, <https://static1.squarespace.com/static/607edb92071ad0422f427dcb/t/61645373f3eab25c6ded87e0/1633965030745/The+Invisible+Hand+of+Media+Censorship.pdf>. (Accessed 27 Oct 2023).

28. Nielsen's 2022 data representative of the Full-Rate Card.

DISTRIBUTION OF THE €1 BILLION ADVERTISING SPEND IN SERBIA



In 2022, 196 non-Serbian companies, many of them well-known US and European global brands, advertised in the Serbian printed dailies and national television channels.

TOP TEN INTERNATIONAL COMPANIES ADVERTISING IN SERBIA²⁹

Company	Country	Industry	% of total ad spend in the country
Lidl Serbia	Germany	discount retailer chain	5.33
Delhaize Group	The Netherlands / Belgium	retail and wholesale conglomerate	5.30
Procter & Gamble	USA	fast-moving consumer goods	3.67
Coca-Cola	USA	fast-moving consumer goods	3.36
A1	Austria	telecoms operator	2.84
Mercator S	Slovenia	fast-moving consumer goods	2.66
Yettel	Czech Republic	telecoms operator	2.62
Studio Moderna	Slovenia	multi-brand retailer	2.13
Ferrero	Italy	chocolate and confectionery manufacturer and retailer	1.83
Heineken	The Netherlands	fast-moving consumer goods	1.45
Total			31.19%

It is worth noting that these figures have largely remained the same in the first six months of 2023, according to Nielsen. Throughout this time, €442.2 million has been invested in advertising on the five TV channels, with 66% coming from foreign companies. There is no data available for print media.

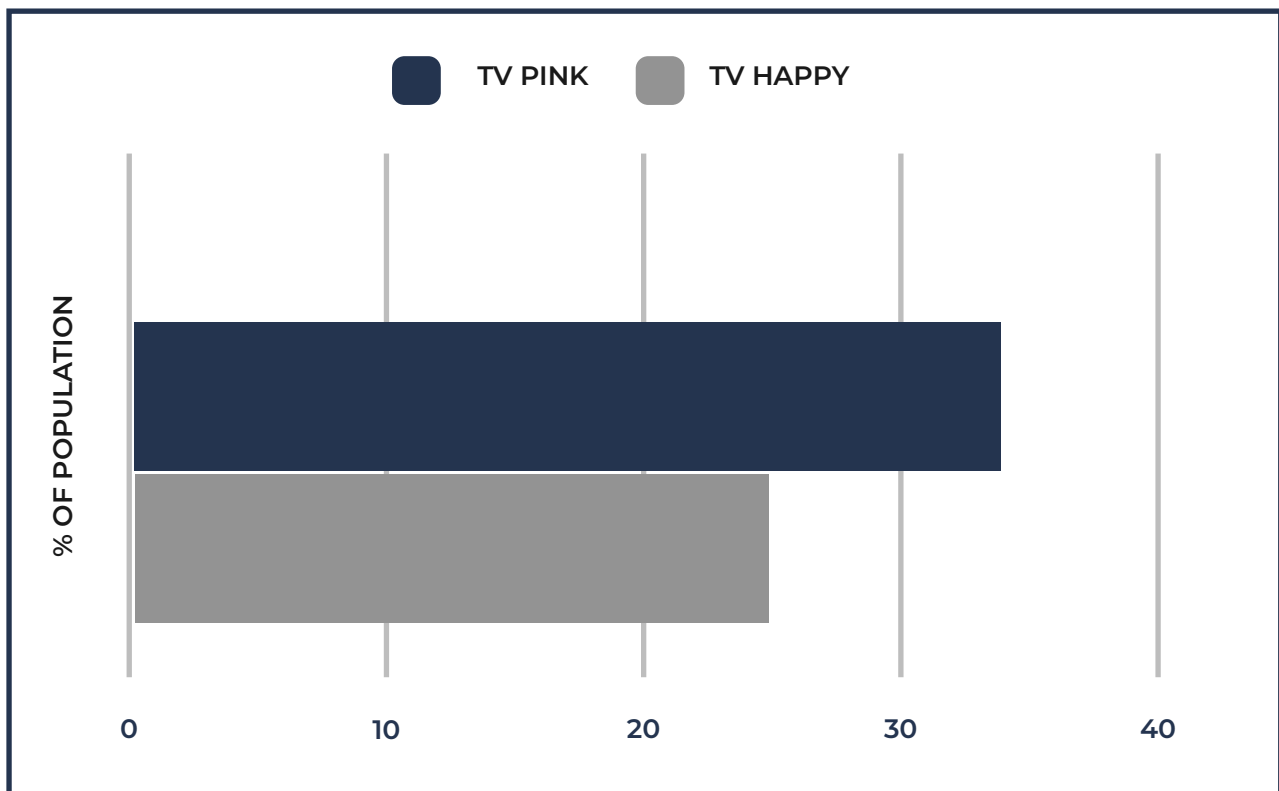
29. Nielsen's 2022 data representative of the Full-Rate Card.

DISINFORMATION CASE STUDIES

TELEVISION

TV Pink and TV Happy are among the primary sources of disinformation in Serbia on mainstream media channels. They are also the second and third most viewed outlets in the country, respectively, after the Serbian state broadcaster RTS.³⁰ The other commercial channels with national coverage – TV Prva and B92 TV – were also found to broadcast pro-Kremlin disinformation, although to a lesser extent.³¹ Therefore, this analysis focuses on TV Pink and TV Happy, the two channels Serbian civil society have identified as most regularly publishing disinformation.³²

Audience Reach of TV Pink and TV Happy



30. Nielsen's Audience Measurement Data (2022).

31. TV Prva outlets are owned by Srđan Milovanović, the brother of a high-ranking ruling-party Serbian Progressive Party (SNS) official Zvezdan Milovanović and are pro-government in their coverage. 'Report: Mapping the media landscape in Serbia 2020-2021,' CRTA, 19 January 2023, <https://crtars/en/report-mapping-the-media-landscape-in-serbia-2020-2021/>. (Accessed 27 Oct, 2023)

32. "Report: Mapping disinformation in the Serbian media" CRTA, 25 January 2023, <https://crtars/en/report-mapping-disinformation-in-the-serbian-media/> (Accessed 03 Nov, 2023)

Both TV Pink and TV Happy are highly sympathetic to the government. According to research from CRTA, they dedicate over 95% of their news coverage to favourable reporting of the government and SNS party interlocutors, while marginalising and attacking the opposition.³³ TV Pink received 45% of the total advertising expenditure analysed by Nielsen, while TV Happy received 10%.

Over 56% of all advertising revenue received by TV Pink comes from global brands, with Lidl, Delhaize Group, and Procter & Gamble as the top foreign advertisers in the outlet. For TV Happy, more than a quarter of advertising revenue comes from international companies. While still a significant proportion of the total advertising revenue, fewer global brands advertised in TV Happy than in TV Pink. Lidl, Delhaize Group, and Slovenia's Studio Moderna are TV Happy's leading foreign advertisers.

Despite having been clearly refuted by international organisations, such as the UN,³⁴ Kremlin disinformation narratives are prevalent on both channels. This includes claims that 'Russia was forced' into conducting a 'special military operation' in Ukraine.³⁵

MAIN ADVERTISERS ON SERBIAN TV



33. 'Godina bez ravnoteže u medijima' [A year without balance in the media], CRTA, 30 January 2023, <https://crt.rs/godina-bez-ravnoteze-u-medijima/>. (Accessed 27 Oct, 2023).

34. 'The UN and the war in Ukraine: key information,' United Nations: Regional Information, Centre for Western Europe, 09 March 2022 <https://unric.org/en/the-un-and-the-war-in-ukraine-key-information/> (Accessed 27 Oct 2023).

35. TV Pink, 30.01.2023, Novo jutro, <https://www.balkanfreemedia.org/report-videos> (Case study one).

For example, in January 2023, Vinko Pandurević, a retired army general, convicted war criminal and regular commentator for TV Pink, stated that Russia had been “under aggression for a long time”, shifting responsibility for the invasion from Russia to Ukraine. Former paramilitary commander, Dragoslav Bokan, similarly likened NATO to “an apocalyptic group of anti-Russian crusaders” on TV Pink.³⁶

30 JANUARY 2023
TV PINK

MAJOR ADVERTISERS



LIDL SRBIJA



DELHAIZE GROUP



PROCTER&GAMBLE



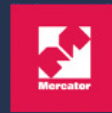
COCA-COLA



“To those who are not well informed, this could seem like Russian aggression against Ukraine, when in fact it’s Russia that has been under aggression for a long time.”

25 JANUARY 2023
TV PINK

OTHER ADVERTISERS



MERCATOR S



YETTEL



HEINEKEN



MARS



MONDELEZ



L'ORÉAL



“[NATO is] an apocalyptic group of anti-Russian crusaders.”

36. TV Pink, 25.01.2023, Novo jutro, <https://www.balkanfreemedia.org/report-videos>. (Case study two).

The Kremlin's false claim that Ukraine is led by Nazis and promotes a Nazi ideology has been regularly promoted by these two TV channels. During the second week of the full-scale invasion, Serbian journalist and regular contributor to TV Happy, Đuro Bilbija repeated claims that Russia is fighting against "the zombified, Hitler's European Union, which is trying to get revenge for 1945."³⁷

**4 MARCH 2022
TV HAPPY**

MAJOR ADVERTISERS



LIDL SRBIJA



DELHAIZE GROUP



"[As Russia] claims that today on the territory of Ukraine, Russia has collided with the zombified, Hitler's European Union, which is trying to get revenge for 1945."

Similarly, in January 2023, TV Happy aired the words of the convicted war criminal Dragan Vasiljković, who claimed that in Ukraine "you can jump-start Nazis very easily", adding, "in Kyiv, for example, you can very easily make the audience shout 'kill the Serb'".³⁸ Other commentators claimed that Ukraine would need "to resolve the problem of Nazis" before any peace deal could be achieved or that "denazification of Ukraine" must be carried out for Russia to enter into any negotiations.³⁹

**25 JANUARY 2023
TV HAPPY**

OTHER ADVERTISERS



STUDIO MODERNA



YETTEL



MERCATOR S



"You can jump start Nazis very easily. In Kyiv, for example, you can very easily make the audience shout 'kill, kill the Serb', even though Serbia is not even playing that match. They are easy to ignite."

37. TV Happy, 04.03.2022, Aktuelnosti, <https://www.balkanfreemedia.org/report-videos> (Case study three)

38. TV Happy, 09.03.2023, Aktuelnosti, <https://www.balkanfreemedia.org/report-videos> (Case study four).

39. TV Happy, 24.02.2023, Aktuelnosti, <https://www.balkanfreemedia.org/report-videos> (Case study five).

PRINT

While overall, print media attracts significantly less advertising revenue than TV, global brands are still spending millions of euros advertising in these outlets. The print media landscape in Serbia is dominated by tabloids that produce sensationalist content and frequently disseminate pro-Kremlin and pro-government disinformation which often originates in public statements or TV interviews.

Informer, the most-read publication in the country according to Ipsos Serbia, regularly promotes disinformation.⁴⁰ For example, on the first day of Russia's invasion of Ukraine, *Informer* carried the front-page headline: 'Ukraine attacks Russia'.⁴¹

22 FEBRUARY 2022
INFORMER

MAJOR ADVERTISERS





LIDL SRBIJA



DELHAIZE GROUP

"The Americans push the world into chaos"

"Ukraine attacks Russia!"

The outlet is also among the main promoters of the narrative that the Bucha massacre was a staged operation by Ukraine and its allies. In August 2022, *Informer* published an article with a headline claiming the massacre in Bucha was "set up". The article contained further unverified claims from a witness who saw the "torture and murder of Russian prisoners of war in a hangar near Bucha."⁴²

03 AUGUST 2022
INFORMER

MAJOR ADVERTISER





HEINEKEN

"THE MASSACRE IN BUCHA WAS SET UP: A 'FIRST-HAND' ACCOUNT OF A CRIME THAT BROUGHT THE WORLD TO ITS FEET!"

The Russians are not guilty of anything...

THE WEST IS ALL WILLING TO BELIEVE EVERYTHING, JUST NOT THIS"

40. Cetinić, G. (2018), 'Serbia,' Media Sustainability Index 2019, 08 November 2018. <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2019-serbia.pdf>. (Accessed 27 Oct 2023).

41. 'Ukraine attacked Russia: How Serbian pro-government tabloids reported on yesterday's events 2022,' European Western Balkans, 22 February 2022, <https://europeanwesternbalkans.com/2022/02/22/ukraine-attacked-russia-how-serbian-pro-government-tabloids-reported-on-yesterdays-events/>. (Accessed 27 Oct, 2023).

42. 'Masakr u buči je namešten, francuz iz "prve ruke" o zločinu koji je digao svet na noge! Rusi nisu ništa krivi, već... Zapad je sve želeo da čuje, samo ne ovo,' [The massacre in Bucha was set up: a "first hand" account of a crime that brought the world to its feet! The Russians are not guilty of anything... The West is all willing to believe everything, just not this], *Informer*, 03 August 2022, <https://informer.rs/planeta/vesti/724677/masakr-u-buci-je-namešten-francuz-iz-prve-ruke-o-zlocinu-koji-je-digao-svet-na-noge-rusi-nisu-nista-krivi-vec-zapad-je-sve-zeleo-da-cuje-samo-ne-ovo>, (Accessed 27 Oct 2023).

The alleged development of biological weapons in Ukraine, which has been comprehensively debunked as pro-Kremlin disinformation, has also featured extensively in Serbian print media.⁴³ In April 2023, one of the oldest and most widely circulated newspapers in Serbia, *Večernje Novosti*, published a headline alleging that the US was using “Ukrainian soldiers as guinea pigs” in bio-laboratories.⁴⁴

13 APRIL 2023
VEČERNJE NOVOSTI



“Russian report on the work of bio-laboratories from the USA -- Ukrainian soldiers used as guinea pigs”

“A new lie about our weapons in Ukraine”

MAJOR ADVERTISERS



LIDL SRBIJA



DELHAIZE GROUP



YETTEL

43. EUvsDisinfo (2022), ‘Biological weapons are banned; biological research is not,’ EU vs Disinfo, 08 April 2022 <https://euvsdisinfo.eu/biological-weapons-are-banned-biological-research-is-not/> (Accessed 27 Oct, 2023).

44. ‘Руски извештај о раду биологорија из САД – украјински војници коришћени као покусни кунџи’ [Russian report on the work of bio-laboratories from the USA – Ukrainian soldiers used as guinea pigs], *Večernje novosti*, 13 April 2023.

The same claims about the bio-labs were promoted in a story published by another popular tabloid, *Kurir*.⁴⁵ *Kurir* regularly features pro-government propaganda, particularly Kosovo-related disinformation. In July 2023, *Kurir* published unverified allegations from Professor Miroslav Bjegović claiming that Kosovan Prime Minister Albin Kurti “wants to conquer the north with terrorist methods.”⁴⁶ The following month, *Kurir* featured a similar statement from Professor Dejan Miletić stating that “Kurti’s dream is the ethnic cleansing of the Serbs!”⁴⁷

02 JULY 2023
KURIR



MAJOR ADVERTISERS



A1



COCA-COLA



LIDL SRBIJA



DELHAIZE GROUP



PROCTER&GAMBLE

“Occupation: Experts: Kurti’s plan is to install KBS in the north and quickly and violently conquer all of Kosovo!”

45. 'RUSIJA: Amerika i NATO otvarali vojne objekte u Ukrajini pod maskom bioloških laboratorija! SAD: Njihove tvrdnje su lažne i smešne' [RUSSIA: America and NATO opened military facilities in Ukraine under the guise of biological laboratories! USA: Their claims are false and ridiculous], *Kurir*, 22 March 2023., “RUSSIA: America and NATO opened military facilities in Ukraine under the guise of biological laboratories! USA: Their claims are false and ridiculous”. (Accessed 27 Oct 2023).

46. 'OKUPACIJA: Stručnjaci: Kurtijev plan je da instalira KBS na sever i brzo i nasilno osvoji celo Kosovo!' [OCCUPATION: Experts: Kurti’s plan is to install KBS in the north and quickly and violently conquer all of Kosovo!], *Kurir*, 02 June 2023, <https://www.kurir.rs/vesti/politika/4189612/okupacija-strucnjaci-kurtijev-plan-je-da-instalira-kbs-na-sever-i-brzo-i-nasilno-osvoji-celo-kosovo>. (Accessed 27 Oct, 2023).

47. 'KURTIJEV SAN JE ETNIČKO ČIŠĆENJE SRBA' Miletić: Teško mi je palo kada sam video ruskog ambasadora SVI IMAJU SVOJE INTERESE' [“KURTI’S DREAM IS THE ETHNIC CLEANSING OF SERBS!” Miletić: I had a hard time when I saw the Russian ambassador EVERYONE HAS THEIR OWN INTERESTS], *Kurir*, 07 August 2023, <https://www.kurir.rs/vesti/politika/4214530/miletic-kurtijev-san-je-etnicko-ciscenje-srba>. (Accessed 27 Oct 2023).

During the armed confrontation between Kosovo police and a pro-Serbia paramilitary group in September 2023, *Kurir* published the headline “The source of evil; Experts: Kurti is solely to blame for all the chaos in Kosovo” on its front page and claimed that Kosovo was engaging in terrorist actions supported by the EU and NATO.⁴⁸

These examples provide a snapshot of the prevalence of disinformation in Serbia’s print media. Alongside *Informer*, *Kurir* and *Večernje Novosti* are leading tabloids *Srpski telegraf*, *Alo!* and *Politika* which spread disinformation in Serbia. Together, these outlets received the vast majority of the €31.1 million advertising expenditure in Serbia’s print media. Lidl, Coca-Cola, Procter & Gamble, Delhaize, Mercator and Yettel were the top international brands advertising on these outlets in 2022.

ADVERTISING IN THE WIDER INFORMATION CONTEXT OF SERBIA

Since Russia’s full-scale invasion of Ukraine, disinformation has increased throughout Europe. What is striking about Serbia’s situation is how common disinformation has become in the mainstream media. This can partly be explained by state capture. Under President Vučić, state control of the media has massively increased, leading to a huge dominance of pro-government voices. In this context, outlets sympathetic to the government, which spread disinformation, maintain a dominant position in the Serbian media, which in turn means they are attracting the largest advertising revenues, including from global brands. Therefore, addressing disinformation necessitates understanding and addressing the wider issue of state control of the media environment in Serbia.

Serbia’s media market is oversaturated, meaning state funding is often crucial for survival. RSF has said that “dependency on state funding makes most media propagandists of the ruling party.”⁴⁹ Part of this state funding comes through advertising. According to the Nielsen data, over 55 organisations linked in some way to the state advertised in Serbian media.⁵⁰ The most notable case is Telekom Srbija, a state-owned telecommunications provider which was the third-largest advertiser in Serbia, accounting for 3.73% of total advertising measured by Nielsen in 2022. The 2022 European Parliament Report on Serbia raised concerns about the “dominant market position of Telekom Srbija” and “any possible state financing of Telekom Srbija, which gives the company an unfair competitive advantage and contributes to the declining condition of the independent media in Serbia”.⁵¹

48. ‘Izvor Zla Strucnjaci: Kurti Isključivi Krivac Za Sav Haos Na Kim. Ali Treća Strana Ima Interese Od Nereda’ [The source of evil; Experts: Kurti is solely to blame for all the chaos in Kosovo. But there is a third party interest from the disorder], *Kurir*, 26 September 2023.

49. Reporters Without Borders (2017), ‘Who owns the media in Serbia?’, <https://rsf.org/en/who-owns-media-serbia>. (Accessed 27 Oct 2023).

50. Nielsen’s 2022 data representative of the Full-Rate Card.

51. European Commission: European Union, ‘REPORT on the 2022 Commission Report on Serbia’ (2022), 02 May 2023, https://www.europarl.europa.eu/doceo/document/A-9-2023-0172_EN.html. (Accessed 27 Oct 2023).

However, the state uses other levers beyond advertising to influence the mainstream media sector in Serbia. According to RSF, Telekom Srbija was involved in the 2019 purchase of the tabloid *Kurir* by SNS ally Igor Žeželj.⁵² Additionally, Telekom Srbija owns the sports channel Arena Sports and has been accused of overpaying for sports rights to displace competitor United Group, which broadcasts some of the last remaining independent media in the country.⁵³ Arena Sports faced a ban in Kosovo in October 2023 following the broadcast of messages that glorified Serb gunmen responsible for attacking police in Kosovo in September 2023.⁵⁴

Serbia's Regulatory Authority for Electronic Media (REM) has also been widely criticized by domestic and international civil society organisations for lacking independence.⁵⁵ REM awards the national free-to-air (FTA) licences in Serbia. These stations, which include TV Pink and TV Happy, dominate the Serbian media landscape. In July 2022, despite concerns regarding their lack of independence and poor journalistic standards, REM re-awarded TV licences for TV Happy, TV Pink, TV Prva and B92 TV.⁵⁶ The situation continues to decline in Serbia. In October 2023, the government passed controversial changes to media laws which were widely criticised by civil society and political opposition for failing to improve the independence of REM and empowering the state to legally own media outlets.⁵⁷ In this context, combating disinformation in Serbia not only necessitates action from global advertisers but demands intervention from international stakeholders, including policymakers, to compel Serbian authorities to stop their undermining of independent media.

52. Balkan Investigative Reporting Network (2017), 'Kurir', <https://serbia.mom-gmr.org/en/media/detail/outlet/kurir/>. (Accessed 27 Oct 2023).

53. O'Connor, R. (2023), 'Premier League Took Money and Turned Blind Eye to Serbia Ruler's Press Crackdown,' *The Times*, 22 November 2023, <https://www.thetimes.co.uk/article/premier-league-took-money-and-turned-blind-eye-to-serbia-ruler-s-press-crackdown-zlsnhdk33>. (Accessed 27 Oct 2023).

54. Isufi, Perparim, 'Kosovo Bans Serbia Sport TV Channels Over Messages "Glorifying" Banjska Attack,' *Balkan Insight*, 05 Oct 2023 <https://balkaninsight.com/2023/10/05/kosovo-bans-serbia-sport-tv-channels-over-messages-glorifying-banjska-attack/> (Accessed 7 Nov 2023).

55. Article 19 (2023), 'Serbia: New Draft Media Laws Another Step Backward for Media Freedom,' *Article 19*, 04 October 2023 <https://www.article19.org/resources/serbia-new-draft-media-laws-another-step-backward-for-media-freedom/>. (Accessed 27 Oct 2023).

56. ECPFM, 'Serbia: REM's awarding of TV licences underscores media pluralism and media diversity failure,' *European Centre for Press and Media Freedom*, 8 Aug 2022, <https://www.ecpmf.eu/serbia-rems-awarding-of-tv-licences-underscores-media-pluralism-and-media-diversity-failure/>. (Accessed 27 Oct 2023).

57. Serbia: New Draft Media Laws Another Step Backward for Media Freedom,' *Article 19*, 4 October 2023 <https://www.article19.org/resources/serbia-new-draft-media-laws-another-step-backward-for-media-freedom/>. (Accessed 27 Oct 2023).

CHAPTER TWO

BFMI

CRTA

DEFUNDING DISINFORMATION ONLINE: THE CASE OF BULGARIA

Disinformation within the Bulgarian mainstream media is not as pervasive as in Serbia; however, the country's information environment is not exempt from false or misleading narratives concerning Russia. The International Press Institute (IPI) has noted that Bulgaria is a "weak link in Europe's fight against Russian disinformation" and offers a "particularly fruitful environment for the spread of pro-Russian disinformation," given the combination of low levels of media literacy and historic pro-Kremlin attitudes.⁵⁸ Bulgaria consistently ranks at the bottom of the EU Media Literacy Index.⁵⁹

IPI underscores that local online media sources and digital platforms serve as primary conduits for disinformation in Bulgaria. Numerous well-known online outlets regularly feature content rife with disinformation and pro-Kremlin sentiments.⁶⁰ A report by the Human and Social Studies Foundation in Sofia found that in 2022 the number of misleading narratives and media posts in Bulgaria increased 20 times compared to the previous year.⁶¹ The same organisation found that over 370 websites had sprung up in 2022 with the aim of spreading pro-Kremlin narratives to the Bulgarian public.⁶²

Bulgarian mainstream media does occasionally feature disinformation, largely due to false narratives spread by pro-Russian parties. However, this is limited. It is clear that disinformation is most endemic online, and this is the area where global brands should ensure sufficient oversight of advertising spending.

58. Capital Weekly Team (2022), 'Is Bulgaria the weak link in Europe's fight against Russian disinformation?'; International Press Institute, 1 Jun 2022, <https://ipi.media/is-bulgaria-the-weak-link-in-europes-fight-against-russian-disinformation-capital/>. (Accessed 27 Oct 2023).

59. 'Balkan Media Assistance Program: A case study in locally led development,' USAID, <https://internews.org/wp-content/uploads/2023/10/BMAP-Localization-case-study-1.pdf>. (Accessed 27 Oct 2023).

60. Capital Weekly Team (2022), 'Is Bulgaria the weak link in Europe's fight against Russian disinformation?'; International Press Institute, 01 Jun 2022, <https://ipi.media/is-bulgaria-the-weak-link-in-europes-fight-against-russian-disinformation-capital/>. (Accessed 27 Oct 2023).

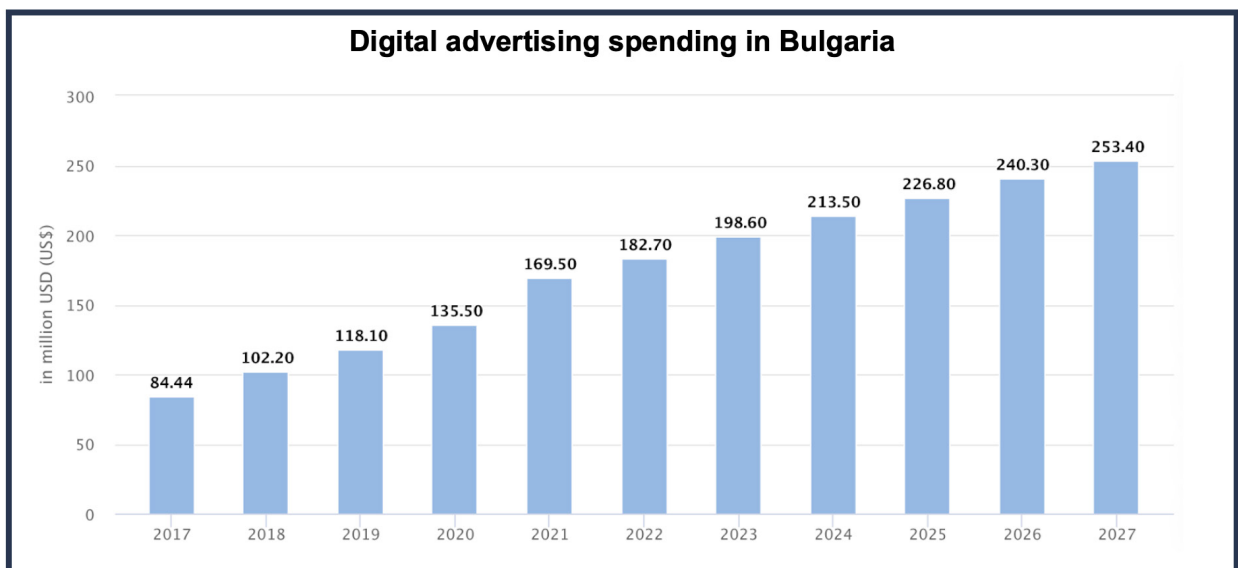
61. Iakimova, M., Dimitrova, V., Donchev L., Valkanov V., Vatsov, D. (2022), 'Russian Propaganda in Bulgarian Online Media,' Human and Social Studies Foundation Sofia (HSSF), <https://hssfoundation.org/wp-content/uploads/2023/04/Report-ENG.pdf>. (Accessed 27 Oct 2023).

62. Ibid

ONLINE ADVERTISING MARKET

Determining the overall expenditure on online advertising is challenging due to lack of public information and transparency. Data on how much individual entities are spending on specific outlets is unavailable.

According to the Interactive Advertising Bureau Bulgaria (IAB Bulgaria), the local branch of the European-wide digital business industry association, Bulgaria is in the top five fastest-growing EU digital markets for 2022.⁶³ IAB Bulgaria reports that digital advertising in Bulgaria is estimated at \$169.5 million in 2021. Local publishers accounted for 27.5% of this spending.⁶⁴



Projections by Statista Market Insights, show that spending in the Bulgaria digital advertising market could reach \$198.60m in 2023.⁶⁵

This data shows that 77% of the digital advertising revenue in 2023 is expected to be generated through programmatic advertising – i.e. the use of automated technology for media buying.⁶⁶ This reflects the industry-wide shift over the past decade, where global brands and their advertising agencies are relying on ad tech companies to place advertising online, as opposed to traditional methods of advertising. Google, the leading ad tech company in the world, has a market share of 30% of the online advertising in Bulgaria.⁶⁷ Programmatic advertising presents a problem for global brands, as it relies on a complex supply chain in which control and information on where their advertising budgets are being spent are lost.⁶⁸ This means that global brands are often unaware of where their ads are being displayed.

63. 'Digital Ad Spend Report' (2021), IAB Bulgaria, https://iabbg.net/wp-content/uploads/2022/10/IAB-Bulgaria_ADEX-Report-2021-SHORT.pdf. (Accessed 17 Oct 2023).

64. Ibid

65. Ibid

66. Ibid

67. Ibid

68. Atkin, C. (2023), 'Are Your Ads Funding Disinformation?', Harvard Business Review, 21 August 2023, <https://hbr.org/2023/08/are-your-ads-funding-disinformation>. (Accessed 27 Oct 2023)

NewsGuard found that the use of programmatic advertising globally has led to global brands inadvertently funding outlets that spread disinformation.⁶⁹ Between 14 and 21 February 2023, NewsGuard analysts found ads for 79 Western brands appearing on 88 sites spreading Russian disinformation. Advertisers included “blue-chip companies such as Hertz, Hulu, Amazon, British Airways, Marriott, IKEA, and Macy’s”, whose ads appeared “alongside articles that advance egregious falsehoods about the war in Ukraine.”⁷⁰

The Global Disinformation Index (GDI) has similarly found that ads from US and European entities placed by Google, Criteo, MGID and other ad tech companies have featured on websites that promote pro-Kremlin disinformation.⁷¹ This includes articles in English, French, Russian and Serbian language. The case of Bulgaria shows that the growing issue of programmatic advertising funding disinformation is now a problem impacting the Balkans.

DISINFORMATION CASE STUDIES

Among the primary actors spreading disinformation are the news websites Blitz, Pogled Info, and Trud. These rank among the most visited Bulgarian-language websites in the country. Since the start of the war, these outlets were found to consistently publish pro-Kremlin disinformation, including that Ukrainian armed forces are deliberately killing civilians, that Ukraine is a Nazi country, and that Bulgaria will become a forced participant in the war.⁷²

PROBLEM OUTLETS IN BULGARIA

Outlet	Online Platform	Monthly Visits
Blitz News Agency	blitz.bg	12.6 million
Trud	trud.bg	3.6 million
Pogled Info	pogled.info	1.4 million

69. Roache, M., Sadeghi, M., (2023) ‘Another Tech ‘Innovation’ With Unintended Consequences’, NewsGuard, <https://www.newsguardtech.com/special-reports/russian-disinformation-programmatic-advertising/> (Accessed 27 Oct. 2023).

70. Ibid

71. Global Disinformation Index (2022), ‘Ad tech continues to monetise disinformation on the Russia-Ukraine Conflict: Ad tech companies, affected brands, policy solutions’, 24 March 2022, https://www.disinformationindex.org/files/gdi_ad-funded-disinformation-on-russia-ukraine-conflict_24-march-2022.pdf. (Accessed 27 Oct. 2023).

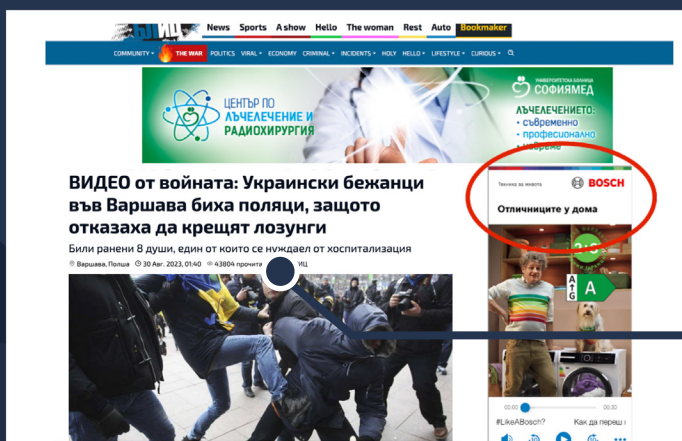
72. Georgiev, G., Petrova, V., and Tsabala, K. (2023), ‘Breaking the Code: Russian and Chinese Disinformation and Illicit Financial Flows in South Europe’, Center for Study of Democracy, 19 April 2023, <https://csd.bg/publications/publication/breaking-the-code-russian-and-chinese-disinformation-and-illicit-financial-flows-in-southeast-europ/> (Accessed 27 Oct. 2023).

Disinformation about Ukrainian refugees has been particularly prominent in Bulgarian media. For example, in August 2023, Blitz published an article titled: “Ukrainian refugees in Warsaw beat Poles because they refused to shout slogans”. The article was based on unverified video footage of a confrontation between a group of young adults fighting in a public space. The source was a channel called “Operation Z: Military Correspondents of the Russian Spring” on the Russian social media platform Telegram. The channel name is a reference to the symbol of pro-Russian support for the invasion of Ukraine.⁷³ This article is featured next to an advert from German multinational Bosch. After being approached for comment by the authors, a spokesperson for the company stated that there are currently (November 2023) no active Bosch campaigns in Blitz.

30 AUGUST 2023

BLITZ

ADVERTISER



“VIDEO from the war: Ukrainian refugees in Warsaw beat Poles because they refused to shout slogans”

73. 'ВИДЕО от войната: Украински бежанци във Варшава биха поляци, защото отказаха да крещят лозунги' [VIDEO from the war: Ukrainian refugees in Warsaw beat Poles because they refused to shout slogans], Blitz.bg, 30 August 2023, https://blitz.bg/svyat/video-ot-voynata-ukrainski-bezhantsi-vv-varshava-bikha-polyatsi-zashchoto-otkazakha-da-kreshchat-lozungi_news972071.html. (Accessed 27 Oct 2023).

Blitz has also promoted the narrative that the US and EU are coercing the Bulgarian government to pursue a hostile agenda against Russia. In February 2023, Blitz published an article titled “The envoy to Soros will issue an ultimatum to Radev” ahead of a visit to Bulgaria from the director of the US Office of Sanctions Coordination, James O'Brien.⁷⁴ The Soros reference implies an antisemitic trope – the unfounded claim that Jewish elites work through the US government and foreign-based non-governmental organisations to promote a political agenda that will bring about the destruction of society. This article featured an ad from the German discount retailer chain Lidl. After being approached for comment by the authors, a spokesperson for Lidl Bulgaria stated that the company will end any cooperation with Blitz in the next financial year.

22 FEBRUARY 2023
BLITZ

ADVERTISER



“Urumov: An envoy of Soros [US State Department official James O'Brien] gave an ultimatum to Radev, this is a national humiliation and a historical disgrace.”

In an article published in May 2023, Trud echoed comments of Kremlin spokesman Dmitry Peskov stating that “the regime in Kyiv is doing its best to involve as many countries as possible directly in this conflict.”⁷⁵ It claimed that Bulgaria was one of the countries most likely to get involved in the fight and featured ads from both South Korean tech multinational Samsung and American website-building company Squarespace.

74. ‘Урумов: Пратеник на Сорос постави ултиматум на Радев, това е национално унижение и исторически позор’ [Urumov: An envoy of Soros gave an ultimatum to Radev, this is a national humiliation and a historical disgrace], Blitz.bg, 22 February 2023, https://blitz.bg/analizi-i-komentari/urumov-pratenik-na-soros-postavi-ultimatum-na-radev-tova-e-natsionalno-unizhenie-i-istoricheski-pozor_news938194.html. (Accessed 27 Oct 2023).

75. ‘Киев готви провокация с ядрено гориво, събщи запознат източник’ [Kiev is preparing a provocation with nuclear fuel, informed a familiar source], Pogged.info, 27 May 2023, <https://pogged.info/svetoven/ukraina/kiiev-gotvi-provokatsiya-s-yadreno-gorivo-saobshti-zapoznat-iztochnik.156429>. (Accessed 27 Oct 2023)

27 MAY 2023
TRUD

ADVERTISERS

SQUARESPACE

SAMSUNG

Peskov on Zelensky's visit to Bulgaria: "Ukraine is trying to involve as many parties as possible in the conflict."

Pogled Info has been one of the main promoters of the unfounded narrative that Ukraine is a Nazi country.⁷⁶ In May 2023, it published an article claiming that due to the lack of military success, the "Kyiv regime" may blow up a storage facility with spent nuclear fuel in Kharkiv.⁷⁷

The article quotes an unnamed source saying, "In this regard, Kharkiv is quite suitable for carrying out such a monstrous terrorist act by Ukrainian neo-Nazis."⁷⁸ This narrative seeks to create a justification for increased violence toward Ukraine and question the legitimacy of the Ukrainian government.

76. Ibid.
 77. Ibid.
 78. 'Директива на Дугин: С кого всъщност воюват Русия и Украйна?' [Dugin directive: Who are Russia and Ukraine really at war with?], Pogled.info, 16 March 2023, <https://pogled.info/svetoven/direktiva-na-dugin-s-kogo-vsashnost-voyuvat-rusiya-i-ukraina.153625>. (Accessed 27 Oct 2023).

Earlier in March 2023, Pogled Info published an article written by a Russian extremist and close Putin ally Alexander Dugin that claims that “Since 2014, Ukrainians have been trained to kill, burn, dismember, fry, wipe Russians off the face of the earth.”⁷⁹ The article featured an advert for Amazon Warehouse.

16 MARCH 2023
POGLED INFO

ADVERTISER



“Since 2014, Ukrainians have been trained to kill, burn, dismember, fry, wipe Russians off the face of the earth. All - men, women, children.”

Check My Ads examined the above key sites to determine the online advertising networks involved in generating advertising revenue for them. Their research found that Blitz, Pogled Info and Trud all use the ad tech companies Google, Criteo, AppNexus and Teads to connect them to the global online advertising supply chain and place ads from global brands on the sites.

79. Iakimova, M., Dimitrova, V., Donchev L., Valkanov V., Vatsov, D. (2022), 'Russian Propaganda in Bulgarian Online Media,' Human and Social Studies Foundation Sofia (HSSF), <https://hssfoundation.org/wp-content/uploads/2023/04/Report-ENG.pdf>. (Accessed 27 Oct 2023).

RISK OF ADVERTISING IN BULGARIA AND BEYOND

Disinformation is pervasive within the Bulgarian media landscape. However, unlike in Serbia, disinformation in Bulgaria largely spreads online. As the report outlines, some of the country's most prominent online news sites regularly publish disinformation, which is then spread further by hundreds of fringe websites, blogs and social media channels.⁸⁰ However, the case of Bulgaria reflects wider issues facing global brands and the advertising sector in relation to digital advertising, especially programmatic advertising.

As GDI,⁸¹ NewsGuard⁸² and others have shown, ad tech companies and the network of actors between brands and outlets are inadvertently facilitating the monetisation of disinformation.⁸³ Some brands that have been alerted to this issue have already taken action to defund disinformation by halting advertising on platforms that have played a central role in disseminating Russian propaganda and election-related disinformation within the United States.⁸⁴ However, there is less awareness and oversight of these issues from brands, advertisers, and ad tech companies operating in the Balkans.

The erosion of media freedom and the poor media literacy levels in the region have rendered the Balkans vulnerable to disinformation, allowing malign actors to foster discord and pursue Russia's agenda in Europe. The case of Bulgaria shows that Russian disinformation efforts to drive the region further away from European integration while undermining democratic values are a real and growing threat. As Bulgaria is a member of the European Union, pro-Russian disinformation in this country carries ramifications not only for the country's democracy, but for the European institutions more widely.

80. Iakimova, M., Dimitrova, V., Donchev L., Valkanov V., Vatsov, D. (2022), 'Russian Propaganda in Bulgarian Online Media,' Human and Social Studies Foundation Sofia (HSSF), <https://hssfoundation.org/wp-content/uploads/2023/04/Report-ENG.pdf>. (Accessed 27 Oct 2023).

81. Global Disinformation Index (2022), Ad tech continues to monetise disinformation on the Russia-Ukraine Conflict: Ad tech companies, affected brands, policy solutions, 24 March 2022, https://www.disinformationindex.org/files/gdi_ad-funded-disinformation-on-russia-ukraine-conflict_24-march-2022.pdf. (Accessed 27 Oct. 2023).

82. Roache, M., Sadeghi, M., (2023) 'Another Tech 'Innovation' With Unintended Consequences,' NewsGuard, <https://www.newsguardtech.com/special-reports/russian-disinformation-programmatic-advertising/>. (Accessed 27 Oct. 2023).

83. Ibid

84. Atkin, C. (2023), 'Are Your Ads Funding Disinformation?', Harvard Business Review, 21 August 2023, <https://hbr.org/2023/08/are-your-ads-funding-disinformation>. (Accessed 27 Oct 2023).

CONCLUSIONS AND RECOMMENDATIONS

BFMI

CRTA:

CONCLUSION

Independent media is in crisis in the Balkans. Through a combination of market conditions and government control over the media, it is increasingly difficult for outlets to maintain editorial independence and financial security. The weakened information environment in the Balkans has made it vulnerable to disinformation. As evidenced in the report, this issue is particularly serious in Serbia where pro-Kremlin disinformation narratives are disseminated across the mainstream media and the state has a comprehensive grip on the market. By contrast, in Bulgaria, disinformation more readily spreads via online media, demonstrating that problems facing global brands advertising in digital media are evolving in the Balkans. Advertising not only enables outlets spreading disinformation to gain financially, it can also act to legitimise disinformation narratives for certain audiences.⁸⁵

This poses major challenges for companies concerned with brand safety at a time when consumers are increasingly basing purchasing decisions on whether brands are aligned with their personal values. In many cases, brands are also contravening their own guidelines and policies regarding supporting Russian disinformation. However, there are a number of concrete steps that can be taken to mitigate these risks and proactively support independent media.

RECOMMENDATIONS

For the private sector:

More engagement from the private sector on media freedom issues is crucial. When approached for comments by the authors, companies asserted that their advertising policies align with established commercial practices and, notably, displayed limited sensitivity to concerns about disinformation in these countries. One spokesperson elaborated that “the only aim of our marketing measures is to inform our customers about our offer,” adding that “the decision on where advertisements are placed is made on the basis of marketing key figures, such as reach.” This sentiment was echoed by other companies, who also deferred responsibility for ad placements to their local representatives, underscoring the necessity for increased transparency in the advertising supply chain.

85. Atkin, C. (2023), 'Are Your Ads Funding Disinformation?', Harvard Business Review, 21 August 2023, <https://hbr.org/2023/08/are-your-ads-funding-disinformation>. (Accessed 27 Oct 2023).

It is clear from this that media freedom issues should be more central to the advertising industry and the corporate responsibility considerations of companies concerned with brand safety and with delivering positive impact. There are many steps that can be taken to ensure their advertising practices have a positive impact on media freedom:

1. Adopt more ethical and transparent advertising practices.

- Global brands should ensure they do not advertise in outlets regularly spreading disinformation. To achieve this, global brands must require media and advertising agencies and ad tech companies to provide them with detailed information on where their ads are going and drop outlets that promote disinformation.
- Global brands and advertising companies should identify credible, independent outlets to support through advertising. This can be achieved through engaging with civil society and media freedom organisations.
- Companies should also consider how protecting media freedoms and preventing disinformation relates to existing environmental, social, and governance (ESG) frameworks.

2. Provide direct financial support to independent media.

- Private businesses should find mechanisms to provide joint financial support to credible media outlets.
- There are existing precedents which can be built on in the region. For example, in Serbia, AsMedi, an association of independent media outlets, provides financial support for independent reporting using fees paid by members, which include private businesses as sponsors.⁸⁶
- Companies can also provide funding and sponsorships to foster stronger journalistic practice through training schemes, investigative projects and fact checking organisations.

The advertising and ad tech sector has a specific role to play in stopping online media from monetising the publication of disinformation. Advertising from global brands is being placed by ad tech companies in problem outlets in Serbia and Bulgaria that publish false narratives. Advertising and ad tech companies can take immediate action and:

3. Update and enforce adequate publisher policies.⁸⁷

- Advertising and media agencies and ad tech companies should develop and enforce supplier quality policies that specifically address narrative-led disinformation. This includes improving oversight when engaging with local partners or third parties to ensure full transparency on where global brands are advertising.
- Sellers should review existing publisher partnerships and take action against those that infringe on policies.
- Outlets and sites that consistently infringe on supply quality policies should be completely defunded.
- Advertising and ad tech companies and brand safety organisations should partner with trusted, neutral third parties to include site risk ratings in their ad placement algorithms to influence better, safer outcomes in real-time bidding for ad space.

86. Ibid.

87. Global Disinformation Index, (2022), 'Ad-funded Elections Integrity Disinformation,' Nov 8 2022, <https://www.disinformationindex.org/research/2022-11-08-ad-funded-elections-integrity-disinformation/>. (Accessed October 27, 2023).

For donors and civil society:

The private sector has a limited understanding of the risks posed to democracy in the region because of curbing media freedoms. Civil society should therefore increase awareness raising efforts on these issues at national and regional level. Other concrete steps civil society can take to encourage responsible advertising practices include:

4. Foster greater engagement with the private sector.

- Civil society should identify companies and private sector actors with a genuine commitment to improving press freedoms and engage with them to define best practices for ethical advertising.

5. Design trust rating tools targeted to the private sector.

- Civil society should work with media experts to develop means of directing investment to credible outlets. For example, the Journalism Trust Initiative (JTI) is an organisation implementing standardized indicators for trustworthiness of journalism. JTI – which was initiated by Reporters Without Borders and has several international partners – provides support to media outlets to voluntarily self-assess their editorial processes, publish the results and be independently audited.⁸⁸

6. Develop “inclusion lists” for international advertisers.

- Based on the trust rating tools referenced above, local civil society ought to develop lists of media in the region that meet certain journalistic and ethical standards, creating a framework for companies to advertise within. This initiative should expand on the ongoing efforts of organisations like Internews, which has conducted research to improve supply chain transparency and established a trusted network of media sources, allowing brands to allocate their advertising budgets to uphold credible journalism globally.⁸⁹

7. Development of stronger analytics for independent media.

- Advertisers need comprehensive data on audience and reach to advertise in outlets. Civil society should work with advertising agencies and independent media to ensure outlets have the tools and skills needed to compile data necessary for attracting advertising investment.
- Civil society should conduct industry wide assessments of news sites to risk rate disinformation. This must be used for a) developing quality signals in ranking and recommender algorithms, b) informing monetisation decisions, and c) assessment of media pluralism.

88. 'About Us,' Journalism Trust Initiative (2022), <https://www.journalismtrustinitiative.org/about1>. (Accessed 20 March 2022).

89. United for News (2019), 'Sustaining Media through Socially Responsible Advertising,' 25 Mar 2019, https://internews.org/wp-content/uploads/2021/02/UnitedforNews_SociallyResponsibleAdvertising_2019-03-25.pdf. (Accessed 27 Oct 2023).

For policy makers:

Many of the issues uncovered in this report have as their root cause major structural issues impacting media markets in the Balkans. For example, non-transparent ownership, lack of independence of media regulators and other forms of state interference. Serbia is an EU accession country, while Bulgaria is an EU country. The European institutions, therefore, have a responsibility to ensure that both countries meet their obligations with regard to media freedom. Policies must also target the monetisation of disinformation and stop the financial incentive for creating harmful content. Actions should include:

8. Conduct regular dialogues with Western Balkan civil society and the private sector.

- The European institutions should lead on taking a multi-stakeholder approach to help coordinate counter-disinformation efforts.

9. Consider limiting financial assistance unless clear media reforms are implemented.

- This is especially important regarding EU funding for Serbia, which is in the process of joining the European Union but has so far failed in its obligations to introduce necessary reforms.

10. Provide greater financial support for programs promoting media and digital literacy.

- This should include programs which teach the general public about disinformation, how to recognise it, and where to report it.
- This should be prioritised in weak media markets within the European Union, such as Bulgaria.

It is important to note that civil society organisations and researchers in these media markets are best positioned to help identify and counter disinformation, but they rely on data access to monitor platforms and ensure accountability. The EU's recent Digital Services Act includes provisions to require major platforms to offer third-party data access, which can and should be enforced in Bulgaria as a member state.

The Balkan region is at a crossroads between integration with the European Union and forming closer ties with authoritarian partners such as Russia. In this context, independent media is of vital importance; however, media freedoms are rapidly diminishing in the region as a result of government interference. Global brands and advertising companies have an important responsibility to ensure their investments in the Balkans do not contribute to the further erosion of media freedom, stability and democracy in the region. Despite the evident challenges, there are also opportunities. In heavily regulated markets, international advertising revenue can provide a key source of funding to independent media which is outside government control. In this way, advertising has an important role to play in not only mitigating the risks of disinformation, but in strengthening the wider information environment in the Balkans.

ABOUT THE AUTHORS

ABOUT THE BALKAN FREE MEDIA INITIATIVE

The Balkan Free Media Initiative (BFMI) is a Brussels-based, independent civil society organisation founded in April 2021 to address the gap in accountability and advocacy on media freedom issues in Southeastern Europe. BFMI monitors developments across the Balkans and informs Western political audiences about the threats to democracy and peace due to the declining information environment. It focuses on overlooked structural issues and market manipulation of the media sector across the region.

ABOUT THE CENTER FOR RESEARCH, TRANSPARENCY AND ACCOUNTABILITY

CRTA is a democracy advocate and watchdog organization focused on assessing the state of Serbia's democratic development, fostering institutional and political accountability and motivating citizen engagement in raising demand for democracy. In 2022, CRTA led the largest domestic election observation mission with more than 3,000 people involved in full-fledged observation. CRTA's efforts are additionally focused on monitoring parliamentary activity and providing accountability-focused assessments through the Open Parliament initiative as well as monitoring of the most influential Serbian media outlets, collecting and analysing information on how the most relevant foreign actors are represented

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APPENDIX 1

The authors approached all companies mentioned in the report for comments.

A1

A spokesperson for A1 stated that the company does not assess the political stance of media outlets, as long as they comply with legal regulations. The company focuses on allocating marketing budgets to reach a broad spectrum of potential service users. They explained that this approach involves engaging with various types of media, including national, regional, and local outlets, as well as those with cable and digital distribution.

Lidl

On Serbia, a spokesperson stated that the only aim of their marketing measures is to inform customers about their offerings. The placement of advertisements and commercials is determined based on marketing metrics like reach, to target current and potential customers. They added that in Serbia this includes national television broadcasters, cable broadcasters, and other relevant media houses. Decisions regarding specific marketing strategies are made at the national level, taking into account the specific circumstances of each country where Lidl operates.

On Bulgaria, a spokesperson stated that Lidl Bulgaria terminated its advertising relationship with blitz.bg at the start of the year (2023). A media partnership with the outlet, involving a budget of around €5,000, continues. They explained that Lidl Bulgaria plans to end all cooperation with blitz.bg at the onset of the next financial year. They added that the only aim of Lidl's marketing measures is to inform its customers about the company's offer and that these marketing decisions are made at the national level, adapting to the specific media landscapes and conditions of each country.

Bosch

A spokesperson acknowledged that Bosch has previously advertised in blitz.bg as part of their broader advertising media mix in Bulgaria but stated that currently there are no active Bosch campaigns running in the outlet. The company outlined their approach to advertising, stating that they utilize media agencies to place advertisements on platforms that are chosen based on criteria such as high reach and the profile of the target audience.



BFMI

CRTA