Media pluralism policy in a post-socialist Mediterranean media system: The case of Croatia[1]

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Zrinjka Peruško
UNIVERSITY OF ZAGREB, CROATIA

ABSTRACT: This paper examines Croatian media pluralism policy in relation to the context of its implementation in a post-socialist Mediterranean media system. Croatian media policy is examined in relation to external, internal, and received diversity at the structural and content levels. In line with this media pluralism policy instruments related to market concentration, media content, diversity in the types of program functions, genres and ideas in media programs, and public service television regulation as an example of internal structural diversity (Hallin & Mancini, 2004) are being examined. In addition, the analysis of received diversity focuses on the role of media audience in the policy framework. The study aims at contributing to the development of the media policy dimension in a comparative media system framework (Humphreys, 2012). To this end it is expected that it will contribute to a better understanding of different policy arrangements in relation to media pluralism in different European countries.

KEYWORDS: media pluralism policy, external diversity, internal diversity, received diversity, models of media systems, Croatia

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INTRODUCTION

Pluralism was first conceived in 1990s post-socialist Croatia as diversity and pluralism of political ideas, including the possibility of free speech for proponents of different political worldviews, and as structural diversity of private media companies' owners as opposed to state media. It took another decade for media critics, civil society and policy makers to start focusing on other aspects of diversity, including genre and program type diversity. The post-socialist legacy, together with difficult relations of independent and state media under president Tuđman's administration and their control of the public state-owned broadcaster HRT in the 1990s

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[1] An earlier, extended version of this article was presented at the International Communication Association Conference entitled "Challenging Communication Research," London, 17–21 June 2013.

is responsible for the expectation that only media commercialization, marketization and privatization will bring the much wanted pluralism and diversity (Peruško Čulek, 1999; 2003). The state was not yet seen as the actor that should, or could, support or ensure pluralism and diversity in the media sector.

In the first part of the 1990s, two "social normative media theories" (McQuail, 1995) crystallized in the legislative debates: a "statehood paradigm" wishing to instill order and responsibility on the part of the dangerous media, and a "pluralist paradigm" wishing to introduce media pluralism, market competition and the free flow of ideas (Peruško Čulek, 1999). In the early 2000, consensus was reached around the pluralist paradigm and applied in a democratic media reform (Peruško, 2005). The liberal pluralist media policy (Freedman, 2008) was thus inaugurated, implemented in regulation and other policy instruments, and persists to date (Peruško, 2011).

Media policy, as one manifestation of the relationships between media and the state in contemporary democracies, constitutes one of the variables that define media systems in different theoretical conceptualizations (Siebert et al., 1956; Blumler & Gurevitch, 1995), including acomparative framework introduced by Hallin and Mancini (2004). While Hallin and Mancini's approach has received wide implementation (for Central and Eastern Europe see for instance Dobek-Ostrowska et al., 2010), the need for further development of the framework is acknowledged also by the authors themselves (Hallin and Mancini, 2012). In addition, Humphreys (2012) argues for attention to additional elements that further differentiate media systems dimensions, notably media policy.

The Croatian media system exhibits the characteristics of a polarized pluralist (Mediterranean) model with regard to all of the dimensions of the Hallin and Mancini typology: weak and late development of the mass media, weak professionalization of journalism, strong political parallelism and the strong role of the state (Peruško, 2012). The political system also displays characteristics that describe the Mediterranean model (Hallin & Mancini, 2004, pp. 89–142) — strong political clientelism and low implementation of rational legal authority, i.e. the rule of law, a political culture which does not value adherence to abstract norms and does not easily differentiate between public and private interest, elites who communicate more to each other than to citizens. The body politic in Croatia today is moderately plural, although historically it was polarized as recently as the 1990s. The media system today is characterized by the dominance of television as the only true mass media, a weak journalistic profession which has difficulty in attaining a satisfactory level of autonomy, a strong relationship between politics and the media (increasingly on a personal rather than institutional level), and a strong role for the state in the media system, which through its regulatory, protective, distributive and redistribute roles compensates for the weakness of the journalistic profession and media self-regulation (Peruško, 2012).

This text examines media pluralism policy in Croatia in the past decade in terms of external, internal and received types of media diversity. It is expected that the analysis will primarily contribute to further development of the

media and state dimension of the Hallin and Mancini comparative framework for media system analysis. As media pluralism also figures in the dimension of political parallelism, this dimension is also further explored in a post-socialist context.

DIMENSIONS OF MEDIA PLURALISM

While the issue of media pluralism is not the main focus of Hallin and Mancini's analysis, political and social pluralism is one of the most important indicators in their differentiation of media systems. Their attention here is on how media systems handle political and social diversity through external and internal pluralism, which they define, respectively, as "news media that represent distinct political orientations or news media that seek to report the news in a 'balanced' way" (Hallin & Mancini, 2004, p. 14). This viewpoint adds an important aspect to analyses of media pluralism policy, possibly providing a wider social context and explanation for regulatory choices.

Furthermore, Hallin and Mancini see models of media pluralism to be related to types of political parallelism. External media pluralism is defined (as in media policy discourse) as the media system level pluralism (both in structural and content aspects) and corresponds to high political parallelism in media systems. Internal pluralism within one media outlet corresponds to media systems with low political parallelism (Hallin & Mancini, 2004, p. 29). Internal pluralism applies also to specific organization of broadcasting governance, in which the content and organizational structure of (usually public service broadcasters) reflects a variety of political views. Hallin and Mancini link this type of pluralism with intermediate political parallelism (2004, p. 30), while control of political parties of different channels in one public service broadcasting organization can be considered as an external form of pluralism (2004, p. 108).

In media policy discourse, the concept of pluralism is more multifaceted (cf. Czepek et al., 2009; Klimkiewicz, 2005; 2010; Karppinen, 2010) than the one used by Hallin and Mancini (2004). Iosifides shows that in the 1992 Green Paper on Pluralism and Media Concentration[2] it was understood interchangeably as pluralism of the press, pluralism in the press, pluralism of information, and pluralism of expression of ideas (1997, p. 86). The Commission Staff Working Paper "Media Pluralism in Member States of the European Union" further states that "Media pluralism is a concept that embraces a number of aspects, such as diversity of ownership, variety in the sources of information and in the range of contents available" (SEC(2007) 32, p. 5). Diversity and pluralism in European

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[2] Pluralism and Media Concentration in the Internal Market — An Assessment of the Need for Community Action. Green Paper. COM (92) 480 final, 23 December 1992. Retrieved February 8, 2013 from http://aei.pitt.edu/1156/.

media policy are linked to media freedom protected by the Convention for the Protection of Human Rights and Fundamental Freedoms[3] in relation to Article 10, where pluralism and diversity of media outlets and media content is a prerequisite for the freedom of expression as the basis for democratic governance and the informed citizenry (Bruck et al., 2002). While this might seem to highlight only its political dimension or rationale, the social and cultural dimensions are necessarily included in consideration of media pluralism and its social outcomes.

McQuail highlights four standard dimensions of diversity defined by Hoffmann-Riem (1987, cited in McQuail, 1995: 144):

- "of formats and issues: essentially referring to differences of media function, such as entertainment, information, education, etc.;
- of contents: in relation to opinion and topics of information and news,
- of persons and groups: essentially access, but also representation;
- of geographical coverage and relevance."

Media pluralism is commonly analyzed in terms of content and structure (cf. Klimkiewicz, 2005).

In order to complement Hallin and Mancini's dimensions of media system analysis, a comprehensive view of all aspects of pluralism policy is being developed. A three-concept approach including external, internal, and received diversity is developed here for the analysis of Croatian media pluralism policy. External diversity is found in media structure and in media content. In structural diversity it pertains to the shape of the market in respect to the number of media owners and outlets; in relation to media content it includes diversity in thematic channels and multi-platform media. Internal pluralism of media content refers to a multitude of different types of program functions, genres, and ideas presented in media programs, the state of source pluralism and program production in relation to independent productions, while internal diversity in relation to structural aspects includes the approach to public service broadcasting regulation (Hallin & Mancini, 2004). Received diversity is a more recent dimension of media pluralism that integrates the consideration of the media audience and its actual choices of media and their content in reflection on media policy. Its structural aspects include the possibility of access to a diverse mix of media and media programs that can (or should) contribute to media literate active citizens. Consideration of audience agency in relation to media system analysis also opens up the avenue of explaining change in media systems (developed in Peruško et al., 2012).

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[3] Convention for the Protection of Human Rights and Fundamental Freedoms as amended by Protocols No. 11 and No. 14. Retrieved February 11, 2013 from http://conventions.coe.int/treaty/en/treaties/html/005.htm.

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Table 1. Dimensions of media pluralism

Level	External diversity	Internal diversity	Received diversity
Structural	Media ownership concentration: market type from diversity to monopoly Type of media Geographical level	Public service broadcasting — diversity of (political) control and management	Many media are accessed/used by audiences as citizens and consumers
Content	Specialized and theme channels, media outlets for niche audiences Multi-platform media content Individual media or channels champion specific political options	Genre diversity, pluralism of worldviews and politics within one medium or channel — balance Source pluralism in news and other programs; independent production	Numerous, diverse contents and world views are received by audiences, opinion and knowledge — media and civic literacy — active citizens participate

Source: author.

EXTERNAL DIVERSITY

External media diversity in terms of structure includes differences of ownership, type, and geographical level. In terms of content it includes the existence of thematic channels, multi-platform media content, as well as parallelism of media and political views.

Structural diversity in Europe is often framed in terms of policies aimed to control media ownership concentration (Bruck et al., 2002). In Croatia this is regulated by specific media regulation and general competition law. Transparency obligations are included with the intention of contributing to ensuring ownership pluralism and diversity, but with mixed results, as true ownership is not always declared, according to popular suspicions. The Law on the Media defines prohibited forms of horizontal concentration in the press, at 40 percent of the relevant market.[4]

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[4] The media laws are frequently changed in Croatia. In this text the latest rendition of the law will be presented unless otherwise noted. Zakon o elektroničkim medijima [Law on Electronic Media], Official Gazette 122/03; Official Gazette 153/09. Zakon o izmjenama i dopunama Zakona o elektroničkim medijima [Law on the changes and additions to the Law on electronic media], Official Gazette 79/07, Official Gazette 32/08, Official Gazette 65/09, Official Gazette 84/2011. Zakon o medijima [Law on the media], Official Gazette 163/03, Official Gazette 59/04; Zakon o izmjenama i dopunama Zakona o medijima [Law on the changes and additions to the Law on the media], Official Gazette 84/11; Zakon o HRT [Law on the Croatian Radio and television], Official Gazette 28/90, Official Gazette 43/92, Official Gazette 17/01, Official Gazette 25/03, Zakon o izmjeni Zakona o HRT [Law on the changes to the Law on

The Law on Electronic Media further defines impermissible horizontal and cross-media concentration of print and broadcast media, enforced within the licensing procedure for broadcasters, and in mergers. The 2009 Law on Electronic Media extended the anti-concentration measures also to the Internet and other distributors/providers as well as to non-linear services (i.e. on-demand TV). In spite of the anti-concentration policy, the media market in Croatia is highly concentrated, although the digital media environment and the economic crisis reduced leading market shares by approx. 10 per cent in television and print media in the 2009–2010/11. In terms of ownership structures including the level of foreign ownership, Croatia shares most of the trends in media concentration observed in other countries of Central and Eastern Europe (Peruško & Popović, 2008a).

In addition to opportunities for new channels provided by the digital switch-over (completed in Croatia in 2011), cable, a growing delivery platform in Croatia, provides a multichannel television environment. Internet access is also growing rapidly (at over 60 per cent in 2012), as well as other delivery platforms (mobile phones, tablets). The public service broadcaster Croatian Radio and Television launched a new digital television channel HRT 3, with cultural programming in September 2012. So far, it has received much approval by the cultural and intellectual elites. This continues the tradition of the pluralism policy of the "third cultural & minority interest channel" applied in Croatia first in public service radio broadcasting, similar to pre-multichannel programming in other European countries (i.e. Germany, UK, France, cf. Humphreys, 1996, pp. 130–133).

Croatian regulations also include incentives and provisions for increased structural diversity in terms of diverse media types and geographical level. Non-profit or community electronic media can only be launched by civil society organizations. These organizations have limited advertising and a reduced concession fee. The National Foundation for the Development of Civil Society also funds non-profit media projects for the development of democracy and civil society. This support extends to projects involving traditional as well as online media, including online platforms and blogs, in this way effectively increasing the diversity of media types. The policy for the promotion and protection of national minorities also contributes to structural diversity in the media landscape. The government, through the Council for National Minorities, funds 47 newspapers in languages of national minorities in Croatia (Zgrabljić Rotar, 2011).

Although empirical evidence is scarce, some research points to the still existing prevalence of external over internal diversity of the press in terms of their coverage of political issues, and audience diversification according to political attitudes and perceived media congruence (Lamza-Posavec & Rihtar, 2003). Analysis of political

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Croatian Radio and television], Official Gazette 33/92, Zakon o izmjenama i dopunama Zakona o HRT [Law on the changes and additions to the Law on Croatian Radio and television], Official Gazette 24/96, Official Gazette 145/98. Official Gazette 76/2012. Constitutional law on the rights of national minorities (Official Gazette 155/02) also applies to structural diversity in the media.

bias in 2007 national television news coverage of the parliamentary election found an almost perfect reflective diversity at the composite level of all television news though differences in channel coverage (Peruško, 2008b). Blatant bias of the 1990s is not noticeable any more (Stantić et al., 2003).

INTERNAL DIVERSITY

Internal media diversity usually means content diversity in terms of diverse genres and program functions (information, education, entertainment, as well as source pluralism or different producers in terms of independent production) and pluralism of ideas within one media organization (McQuail, 1995). The concept can also extend to include the pluralist structure of governance of broadcasting organization, especially public service broadcasting (Hoffmann-Riem, 1996, cited in Halin & Mancini, 2004, p. 166). In line with this we will look at both the content and governance aspect of internal diversity in Croatian media policy.

In a dual broadcasting system developed in the 1990s, both commercial and public service broadcasting are seen by policy makers as serving the public interest (Peruško Čulek, 1999; Peruško, 2009).

The Law on Electronic Media obliges broadcast media to contribute to the comprehensive and impartial informing of the public and to free public debate, as well as to education and entertainment of viewers and listeners through program content.

Program diversity obligations for general commercial broadcasters include news quotas, percentage of domestic production, and a percentage of programs broadcast in Croatian. Local and regional level broadcasters now have to broadcast a minimum of 10 per cent of news programs on a weekly basis, while national and regional level broadcasters have to include only 30 minutes of current affairs programs in a day, including one news program of at least 20 minutes duration.

The EU Audiovisual Media Services Directive was fully transposed into the Croatian Law on Electronic Media in 2009, and quotas for European programs apply.

The Law on Croatian Radio and Television regulates the programming expectations from the public service broadcaster HRT. With a reference to its remit the importance of balanced broadcasting of information, culture, education and entertainment is emphasized. Pluralism of ideas and worldviews, political and religious ideas and interests should be presented to the public in an unbiased and respectful way. Standards of independent journalism must be observed in verifying information for publication, and facts should be separated from comments. Attention should be given in programming to specific groups, such as Croatians abroad, national minorities in Croatia, children and youth, and people with disabilities. In addition to these general statements, the insurance of diversity is enabled through a defined percentage of domestic production, program output in the Croatian language and specific genres and program functions that have to be produced in Croatian (particularly movies, documentaries, cartoons and entertainment).

According to Hallin and Mancini (2004), governance of public service broadcasting is related to the translation of political and social pluralism to media governance. In Croatia, as in other post-socialist democracies, the models of public service broadcasting were mainly imported from western European role models (Spichal, 2000), and the types of regulation depended more on the origin of the European expert advisors or trends in European broadcasting, than the needs and characteristics of the media systems or societies in question. Until June 2012, when the change to the Law on Croatian Radio and Television was adopted following a change in government earlier that year, the governance model of public service media in Croatia was a combination of the (multi-party) parliamentary and corporative models (Humphreys, 1996) incorporating representatives of civil society organizations (appointed by parliament) in the HRT Council. As Croatia has no history of corporate organization, there are no social segments to be truly represented. Thus, members of the councils and other media regulatory bodies only actually (though not structurally as this is a conflict) "represent" the political parties that supported them or NGO's with no claim to social representativeness.

The organizational structure and the arrangements regarding the structure of governing bodies of the public service media, their election and competences were changed in 2012 into direct parliamentary appointment of the HRT director general, who has to have significant professional experience. Appointment is by parliamentary majority vote after a public contest and debate in the Parliamentary Committee for Information and Media. The new director general was elected in Parliament in October 2012 with an overwhelming majority, with only the opposition HDZ voting against. The appointment was not, in the majority of the interested public, considered political, but a welcome break with the non-transparent earlier practices. The HRT Programming Council, whose role is to represent the public interest in programming matters, is still composed of representatives of civil society, and their new role extends to program reviews in terms of the public service contract but with no governing duties or possibility of sanction. As the new review of the regulatory framework for public service television is not yet completed, it is hoped that the professional model (in terms of Hallin & Mancini, 2004, p. 169) or arms length governance (in terms of Humphreys, 1996, p. 156), which increases relative autonomy of broadcasting from politics/government and relies on the professional standards of media autonomy and quality, might be fully implemented, as the only one that could possibly have a positive effect given a majoritarian democracy, a homogeneous society without strong political polarizations.

The obligation of independent production also contributes to internal content diversity in the audiovisual media, but we could also see its contribution to source diversity as well as organizational diversity that are reflected in the content offered.

Non-profit radio and television stations, which add to the external structural diversity of the media system, also have legally defined internal program diversity requirements. They must produce at least 50 per cent of their output, half of which

must include public service content — informational, educational, professional, scientific, artistic and cultural.

The Fund for the Protection of Pluralism and Diversity of Electronic Media supports the production and broadcasting of media content of public interest in local and regional radio and television, especially information programs, programs for national minorities, promotion of cultural creativity, education, science and art. The Fund is financed by 3 per cent of the license fee collected by the public service broadcaster HRT.

The Law on the Media obliges the state to promote pluralism and diversity through subsidies for the production and publication of public service content. Diversity and pluralism are linked with giving service to specific social groups (national minorities, women, and disabled persons), type of media (local, non-profit media, and non-governmental media). The public service, HRT, has special programs for national and ethnic minorities. The Newsroom for Minorities and Civil Society of the Croatian Radio and Television, reported that weekly programs for national minorities on Croatian radio constitute 1 per cent in the total talk segment of the radio program. The regional stations of the Croatian radio also broadcast daily news programs for national minorities in their languages (Zgrabljić Rotar, 2011).

McQuail (1995) includes impartiality and balance in reporting of different views as variables of internal pluralism in the media. These requirements are included in all the media laws in Croatia, and oblige the print media as well as the audiovisual media. The Croatian Journalists Association also has an Ethics code, although no power to enforce its self-regulatory findings. Publishers established a new self-regulatory body with this aim in 2011, though no further information was made public about its work. The public service broadcaster also adopted a self-regulatory measure for independent reporting. HRT journalists are not allowed to express political preferences or opinions, and editors-in-chief cannot hold any party political office (though this has not always been observed). Rules against discrimination and for ensuring tolerance in media content also support diversity and pluralism.

Academic research gives some pointers regarding actual pluralism and diversity of genres in Croatian television. Diversity of content in commercial television at a national level are found to be wanting, especially in regard to information and current affairs programs, culture, education, and significantly larger genre diversity in the programs of the public service HRT (Ward, 2006; Peruško, 2009). Research also shows that quotas of domestic and European audiovisual fictional works on Croatian television are not met (Peruško & Čuvalo, 2010). The share of "socially useful" public service content did not increase in total television programming with the advent of commercial television — in 1959 one channel of Croatian television (then Television Zagreb) broadcast 10 per cent of current affairs programs — in 2009, two public service channels are still the only ones which broadcast this type of programs

(also around 10 per cent of their programming). News programs remained at the same 15 per cent of all broadcast programs. The contribution of commercial television was positive in increasing the number of independent newsrooms providing welcome source diversity and external pluralism at the level of the media system.

RECEIVED DIVERSITY

McQuail (1995) mentions three dimensions of audience-related media pluralism: diversity of access, diversity of choice, and reflective diversity. Received diversity (or exposure diversity) (Napoli, 1997) is defined as including access to a structurally diverse media landscape, in addition to a pluralist and diverse content consumed by the audience.

The notion of received diversity is a relatively new attempt to include the audience when discussing media pluralism policy (Breeman et al., 2011). Audiences are often implied in media policy research, either as "beneficiaries" or as "victims," without seriously considering their roles (Livingstone, 1998). The idea of enhancing policy effectiveness by explaining the transparency of user/audience media choice decisions in order to enhance the pluralism and diversity of their "media diet" (Breeman et al., 2011) could be seen as paternalistic, or as infringing on freedom (Napoli, 1997). In a media literacy framework, however, in which received diversity is part of audience empowerment for active citizenship, this policy goal could be seen in a positive light.

Received diversity obviously presupposes internal or external diversity in media structure and content, but is not determined by it. In a multiplatform networked media landscape it is quite possible to choose always the same kind of content from different media platforms, thus avoiding diversity in content functions or pluralism of ideas and worldviews, while satisfying the need for always different, yet the same, fare of popular culture in perpetuation of the "ever-changing sameness" (Adorno, cited in Harper, 2012, p. 98). Should policy attempt to remedy this in order to ensure that the citizen audiences receive a necessary minimum daily dose of content important to democracy, and if so, which policy? Does media pluralism add to media literacy, or vice versa? Is media literacy needed in order for the citizen audience to be able to benefit from media pluralism? To frame it in another way, is the available diversity and pluralism of media and media content in a multichannel networked media environment only of any (social) use if the members of the audience are not only aware of its existence, but have the necessary knowledge and sensitivity/curiosity/engagement to partake of it?

In this regard the audience can also be conceived of as the active participant which shares in the creation of civil society, defined by communication practice in terms of deliberative democracy (Peruško, 2008a). The necessary ingredients for an active citizen, then, are on the one hand structural, and on the other relate to an individual person's choices. In order to understand the dynamics of audience

relationships to media content and media organizations, we need to turn to disciplinary knowledge on determinants of audience choice (for one of the latest overviews see Hartmann, 2009). Recent research shows a relationship exists between the structure of the media system and media choice (Webster, 2009), especially in terms of different quality of information flow in different types of media systems (Aalberg et al., 2010; Iyengar et al., 2010). This line of enquiry is certainly interesting also in relation to explanation of media systems change in terms of audience agency (developed in Peruško et al., 2012).

Audience research in Croatia in the past two decades can best be described (with few exceptions) as preoccupied with the size and demographics of the audiences of particular media or media programs. Academic research on audiences in Croatia has predominantly been of a social scientific character, and has investigated media audiences in terms of public opinion surveys, thus constructing the "audience" from a sample of individual citizens, and not in terms of audience as a culturally defined collective (Livingstone, 1998). The main questions were related to trends of media use, in relation to different variables of personal characteristics and social or political attitudes. In terms of access, recent research seems to confirm also in the case of Croatia the influence of socioeconomic and educational factors in received diversity; audiences with higher incomes can afford to use more media and media content on offer, thus enjoying greater potential received diversity (Čuvalo, 2011). Access is included in media policy especially in relation to public service and terrestrial television, while the issue of universal access in a networked media environment has not yet become a distinct policy goal.

So far only one study of received diversity has been conducted, focusing on television genres and content types in the context of the analysis of public interest concept and its fulfillment on Croatian television (Peruško, 2009). The results show, on the basis of interfacing the broadcast genres/program categories and their audience ratings, that the audiences lack information programs, are given too much fiction, and that the public interest defined in terms of diversity of program types is not fulfilled by commercial television.

Media literacy is only marginally addressed in academic research and policy (Zgrabljić Rotar, 2008; Švob-Đokić et al., 2011), in spite of provisions regarding media literacy included in Croatian legislation.

CONCLUSIONS

Croatian media policy defines media pluralism in relation to media structure and media content, both of which have different implications for external, internal or received type of diversity and pluralism. The state in Croatia assumes the roles of patron, as well as distributive and redistribute roles (von Beyme, 2008, p. 23) in the media market, through direct subventions to minority media, by co-financing audiovisual production, the redistribution of HRT license fees, and

through promotion of pluralism and diversity by special support for programs of local and regional electronic media from a levy on commercial broadcasters. Pluralism of worldviews and social diversity expectedly figure prominently in the programming and oversight remit of the public service broadcaster, but they are also expected in the programs of commercial electronic media. Pluralism and diversity (much more than market competition) are also the reason for anti-monopoly regulation and ownership restrictions (Peruško, 2011). The changing nature of the media in the digital age has not yet been truly noticed in media policy in Croatia in relation to the issue of media pluralism, or in any socially relevant way, except in terms of the growth and spread of new technology (Peruško & Popović, 2008b).

Protection of pluralism and diversity is achieved in Croatia through several connected mechanisms. Structural external diversity is protected by preventing ownership concentration in the media, cross-media concentration (press and electronic media), ensuring transparency of data concerning media and their owners, supporting media at different geographical levels and of different types (i.e. non-profit, minority), as well as by advancing thematic channels in digital television. Extensive statutory requirements are included, regarding content diversity and pluralism in terms of program types of socio-cultural and political interest and regarding standards of objectivity and impartiality for information reporting. Diversity and pluralism are also promoted by public subsidies for program production in the public interest in local radio and television, national and ethnic minority media and non-profit media. Internal diversity is promoted by the public service broadcaster, HRT.

The competitive framework for the media is changing in favour of the commercial vs. public service media. While both internal and external pluralism and diversity are part of policy in structural and content terms, received diversity has only recently started to be recognized as a potential policy avenue. Croatian media policy approach has not yet shifted from the passive audience or the implied audience model, and has not attempted to gauge the needs of the audiences in terms of civic and political participation or their rationales for media content choices, nor the possibilities of policy in media and education for increasing the social role of the contemporary media in enabling political and civic participation of audiences. These two lacunae clearly point to areas of future research attention and policy debates.

In understanding the nature of media pluralism (and the related political parallelism) the political context of the media system has an important role. According to the original framework of three models of media systems (Hallin & Mancini, 2004), majoritarian democracies are more prone to individual pluralism in politics and internal media pluralism, while consensus democracies in segmented societies tend more to external pluralism of the media and to organized, corporative pluralism in politics extending especially to political representation in broadcasting (Hallin & Mancini,

2004, pp. 51, 53–54). External diversity also seems to be the characteristic of recent democracies, damaged democracies or non-democratic regimes (Zhao, 2012; Kraidy, 2012), and internal pluralism seems to develop with the progress of consolidation (Albuquerque, 2012). In Croatia, as a post-socialist Mediterranean model country, attention to pluralism is pronounced in terms of both external and internal diversity at the structural and content levels, by implication in expectation of received diversity. Whether this is the result of the need for political and cultural pluralism which was lacking during the country's one-party history, or the wish to implement fully the European best practice, will be clearer only after further comparison with similar post-socialist countries of the Mediterranean model and the countries representing features of two remaining models. Only by observing these similarities and differences in a wider context of the media and political system characteristics, one will be able to explain developments in media pluralism policy in a systematic fashion, as critically shaped by the historical and cultural specificities of individual media systems developments, and in terms of the homogenization of liberally driven media policies at the global level.

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