# ARTIFICIAL INTELLIGENCE IN THE MEDIA OF NORTH MACEDONIA

## Toward common standards for regulation and self-regulation


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## Toward common standards for regulation and self-regulation

**PhD Snezhana Trpevska**
**PhD Marina Tuneva**

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All other correspondence relating to this publication should be addressed to: Horizontal.Facility@coe.int.



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# Introduction

The rapid evolution of artificial intelligence (AI) and other emerging technologies is reshaping the global media environment, creating new opportunities for innovation while simultaneously introducing complex ethical, professional, and regulatory challenges. In North Macedonia, as elsewhere, the audiovisual sector stands at a critical juncture: while the potential of AI tools for content production, data analysis, and audience engagement is increasingly recognized, their integration remains fragmented, inconsistent, and largely unsupported by strategically established policies or internal protocols. This situation underscores the urgency of adopting a coherent framework that both enables technological progress and safeguards fundamental rights, professional standards, and democratic values.

This analysis was prepared at the request of the Agency for Audio and Audiovisual Media Services (AVMU), within the framework of the European Union and Council of Europe action "Protecting freedom of expression and of the media in North Macedonia (PRO-FREX)." It reflects the action's overarching objectives to strengthen the independence, professionalism, and accountability of the media sector, while supporting alignment with European standards in the protection of freedom of expression. In particular, the study examines how new technologies, most notably AI, intersect with existing legal, ethical, and professional frameworks in North Macedonia, and how gaps in regulation and self-regulation affect both the media community and the wider public interest.

The findings demonstrate that, despite growing awareness among journalists, editors, and regulators of the risks posed by algorithmic bias, disinformation, and diminished editorial autonomy, structured policies and unified practices remain underdeveloped. Initiatives such as the revision of the Code of Journalists, the adoption of regional declaration on AI, and civil society debates on ethics and digital rights mark important initial steps, but they require systematic institutional support to achieve meaningful impact. This analysis therefore contributes to the goals and objectives of the PPO-FREX action of the Council of Europe by mapping current practices, identifying key challenges, and offering guidance to the Agency for Audio and Audiovisual media Services, the Council of Media Ethics and the Association of Journalists for developing standards and practices that uphold media integrity, transparency, and professional autonomy in the digital age.

Ultimately, the study seeks to inform both policymakers and practitioners by providing a comparative perspective grounded in international best practices, while remaining attentive to the specific context of North Macedonia. By situating the debate on AI and new technologies within the broader mission of protecting freedom of expression and strengthening media pluralism, the analysis aligns with the central aim of the

PPO-FREX action: to contribute to an improved environment for the exercise, in particular by journalists and media actors, of the rights of freedom of expression, in a more pluralistic and safer media environment, in line with the standards set by Article 10 of the European Convention of Human Rights.

# Biography of the authors

**PhD Marina Tuneva** is an independent media and communication expert and Associate Professor at the Institute for Communication Studies in Skopje. With over two decades of experience, she works across the fields of journalism ethics, media freedom, artificial intelligence, disinformation, media and information literacy, strategic communication, and diversity and inclusion. She has collaborated with numerous national and international organizations on advancing ethical, inclusive, and transparent practices in media and strategic communication. Dr Tuneva has authored numerous publications, handbooks, and research papers on professional journalism, self-regulation, and the ethical use of technology in media, including the *Guide on Media Integrity* (UNDP, 2023) and the analysis *From Global Experiences to Local Standards: Ethical Challenges and Solutions in Journalism* (MIM, 2023). She is also the author of the *Declaration on the Ethical and Transparent Use of AI in Media* (Council of Media Ethics of Macedonia, 2024), developed within a UNESCO-supported regional initiative of press councils. A former Executive Director of the Council of Media Ethics of Macedonia and a Distinguished Humphrey Fellow of the U.S. Department of State, Dr Tuneva continues to promote media integrity, transparency, and the human-centered application of technology in journalism, communication, and democratic governance.

**PhD Snežana Trpevska** is a media policy expert and researcher at the Research Institute on Social Development (RESIS) in Skopje, a multidisciplinary research organisation established in 2017 in response to the growing need for thorough social research aimed at comprehensive understanding of the complex social phenomena and processes. Her research interests cover Media Policy and Regulation, Media Literacy, Journalism and Media Studies, Sociology of Mass Communication, and Audience Research. Ms Trpevska holds an MA in Communication Studies and a PhD in Sociological Sciences from the University "St. Cyril and Methodius" in Skopje, North Macedonia. Until July 2009, she headed the Research and Strategic Development Department of the national media regulatory authority. Since 2008, she was lecturer at the School of Journalism and Public Relations, and since 2013 she was also a

professor at the Institute of Communication Studies in Skopje, where she has taught Media Law and Media and Audience Research Methods. Dr Trpevska has contributed to numerous academic and applied research projects in the fields of freedom of expression and media pluralism, media concentration and broadcasting regulation, audience research, journalism ethics, media and conflict, and related areas. In 2022 and 2024, she served as a national expert on media law, policy and markets in the project *EU for Freedom of Expression: Alignment of National Media Legislation with the EU Acquis and European Media Standards*.

# 1. Context, objectives and methodological approach

## 1.1 Problem description

The rapid application of artificial intelligence (AI) across various fields has delivered significant benefits to societies. However, it simultaneously raises several concerns regarding its impact on human rights, democracy, and the rule of law. In recent years, the growing use of AI has brought into focus the question of whether existing legal frameworks are fit-for-purpose, highlighting the need for new regulatory and policy measures, as well as for the adaptation and modernisation of self-regulatory mechanisms within the media sector.

The application of AI in the audio and audiovisual media industry offers numerous opportunities for innovation and development. It is already being used to optimise production processes support journalistic investigations, enhance creative projects and initiatives, and tailor content production to the specific needs of different audience segments.

However, the integration of AI into the production of journalistic, documentary, and entertainment audio and audiovisual content also raises several dilemmas and risks[1]:

- AI has the potential to "homogenise" content and diminish creative diversity, which ultimately affects the overall range of content and undermines media pluralism - a key regulatory objective in the field of media policy;
- The ability of AI to generate sophisticated and seemingly credible content - including disinformation - poses risks not only to the credibility of journalism and media but also to democratic processes more broadly;
- The increased use of AI in content creation may further threaten job stability in the audiovisual media sector;
- The use of generative AI in production of audio and audiovisual content complicates the protection of copyright and other personal rights, such as the use of copyrighted works, photographs, or the voices of performers;
- The deployment of AI without adequate editorial oversight may infringe individuals' right to privacy, as AI systems often rely on large datasets containing personal information.

To address these complex challenges, both the European Union and the Council of Europe have been working, in recent years, towards the development of a harmonised regulatory approach that would enable an adequate and timely response to the technological transformations brought about by the use of AI.

1 Maja Cappello, ed., *AI and the Audiovisual Sector: Navigating the Current Legal Landscape* (Strasbourg: European Audiovisual Observatory, IRIS, October 2024).

The *Framework Convention on Artificial Intelligence* of the Council of Europe[2] adopted in May 2024 and opened for signature in September 2024, sets out the principles for the responsible development and use of AI, with a particular focus on human rights, democracy, and the rule of law. It emphasises that AI systems should be developed and used in ways that respect fundamental human rights.

In April 2024 the Council of Europe also established a Committee of Experts[3] tasked with examining the impact of Generative AI on freedom of expression. By the end of 2025, the Committee will deliver a non-binding document — draft *Guidance Note on the Implications of Generative Artificial Intelligence for Freedom of Expression*, to be submitted for adoption to the Steering Committee on Media and Information Society (CDMSI).

On the EU level, the *Artificial Intelligence Regulation*,[4] adopted in June 2024 and entered into force in June 2025, introduces obligations of transparency and accountability for providers of generative AI, including requirements to comply with copyright regulations. Providers of general-purpose AI models are also obliged to publish detailed documentation on the content used to train their systems, in line with guidance issued by the newly established AI Office within the European Commission.

*The General Data Protection Regulation (GDPR)* [5] governs the collection, processing, and storage of personal data. Among other provisions, it also sets out how AI systems may collect and use personal data when training AI models.

Beyond regulatory frameworks, self-regulation within the media sector represents a crucial element in managing the use of AI. Global practices to date highlight the significant role of self-regulatory mechanisms, particularly in relation to automatically generated content. Ethical considerations - including transparency, accuracy, data protection and copyright – must be given special attention. Many media organisations already apply the "human-in-the-loop"[6] principle as a mandatory safeguard before publishing AI-generated content, in order to uphold professional standards and minimise potential errors or biases.

2 Council of Europe, *Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law* (Vilnius: Council of Europe, 2024).

3 Committee of Experts on the Impacts of Generative Artificial Intelligence for Freedom of Expression (MSI-AI).

4 European Union. Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act).

5 European Union. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

6 "Human-in-the-loop" refers to an AI system design in which human oversight, input, or intervention is incorporated at key stages of the automated process, ensuring that critical decisions are reviewed or guided by a human.

## 1.2 Research topic and objectives of the study

Considering the core mandate of the media regulatory body — to support the development of the audio and audiovisual media sector, while also to protect freedom of expression and promote media pluralism — this study aims to identify the main benefits and challenges of applying AI in the audiovisual sector in the Republic of North Macedonia. It also seeks to outline possible directions for the development of future regulatory policy.

Given that the use of AI also affects the observance of fundamental journalistic principles such as accuracy, context, credibility, and transparency, the study will contribute with insights and recommendations for the development of ethical standards in "AI-assisted journalism"[7]. This will support the work of self-regulatory bodies such as the Council of Media Ethics of Macedonia and the Council of Honor within the Association of Journalists of Macedonia.

The overall objective of the study is to present relevant international standards and the current local context, and to examine potential future alignment with instruments in this field[8], including the Council of Europe's *Framework Convention on Artificial Intelligence*. To achieve this, the research conducted within the study was designed to fulfill the following specific objectives:

(1) To provide an overview of the latest regulations and instruments of the Council of Europe and the European Commission related to the application of AI in the media sector (Chapter 2);

(2) To offer a comparative overview of the application of AI in the media sectors of both developed and developing countries, highlighting positive examples of innovative uses of AI in the production of journalistic content (Chapter 3);

(3) To map the benefits and areas of application of AI in the audiovisual media sector, and to identify potential negative consequences for professional standards and practices in the production and distribution of media content (Chapter 4);

(4) To provide a comprehensive overview of the current state of application of AI in the audiovisual media sector in the Republic of North Macedonia, focusing on the institutional and regulatory context, editorial practices, risk assessment, as well as existing initiatives by civil society and the academic community aimed at developing ethical standards and fostering critical public awareness in evaluating AI-generated content (Chapter 4);

7 AI-assisted journalism refers to the use of artificial intelligence tools to support journalistic processes, such as content creation, data analysis, fact-checking, or audience targeting, while maintaining editorial oversight.

8 Other relevant instruments of the Council of Europe in this field include also: CM/Rec(2020)1 on the Human Rights Impacts of Algorithmic Systems, CM/Rec(2022)4 on promoting a Favourable Environment for Quality Journalism in the Digital Age, CM/Rec(2022)11 on Principles for Media and Communication Governance, CM/Rec(2022)13 on the Impacts of Digital Technologies on Freedom of Expression, and the Guidelines on the Responsible Implementation of Artificial Intelligence Systems in Journalism, adopted by the Steering Committee on Media and Information Society (CDMSI) in 2023.

(5) Finally, based on the comparative overview and findings from the field research, to propose concrete directions for the future development of regulation and regulatory policy in this domain, updates to the Journalists' Code of Ethics, and potential forms of coordinated action between the Agency for Audio and Audiovisual Media Services (AVMU) and the Council of Media Ethics of Macedonia (CMEM) (Chapter 5).

## 1.3 Methodological approach

To achieve the set objectives, the study applies a combination of several qualitative methodological approaches:

*Comparative analysis:* The study includes an analysis of relevant documents and reports from international organisations, such as the Council of Europe, the European Union, and media entities with experience in the application of AI in the media sector.

*Review of published research and analyses***:** A review was undertaken of recent studies related to the research topic. The literature review features examples from various European countries that have already introduced regulatory and self-regulatory measures concerning the use of AI in the media, with particular focus given to the best practices, challenges, and lessons learned.

*Stakeholder interviews***:** Semi-structured interviews were carried out with representatives of audiovisual news media in the Republic of North Macedonia that are currently using or planning to introduce AI-based tools. Interviews were also conducted with representatives from regulatory and self-regulatory bodies (AVMU, CMEM, AJM), as well as academic experts working at the intersection of AI, media, and human rights. The aim was to gain in-depth insights into current needs, experiences, and expectations related to AI deployment, and to gather recommendations for regulatory and self-regulatory responses.

Given the specific competencies of the media regulator, this study does not cover issues related to copyright or personal data protection. Instead, it focuses on three of the five key risks areas identified in the broader debate on AI in the media: (1) the implications for content diversity and media pluralism, (2) risks to ethical and professional standards, including the spread of disinformation, and (3) potential consequences for employment in the audiovisual sector.

# 2. Regulatory Acts and instruments of the Council of Europe and the European Union

## 2.1 Council of Europe approach and instruments

The Council of Europe's work in the field of AI has focused on addressing the potential risks posed to the democratic institutions, the protection of human rights and the rule of law. Its Committee on Artificial Intelligence (CAI) has been mandated to "*maintain a transversal approach, also by co-ordinating its work with other intergovernmental committees and Council of Europe's entities equally addressing the implications of AI in their respective field of activity, by providing these committees and entities with guidance […] and by assisting them in resolving problems*".[9]

While the impact of digital technologies and the internet on freedom of expression, media and journalism has been the subject of numerous studies, documents, and legal instruments developed by the Council of Europe bodies, this analysis focuses specifically on those addressing the challenges and effects arising from the application of AI in the context of human rights, particularly the right to freedom of expression.

### 2.1.1 Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law

The *Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law*[10], adopted on 17 May 2024 and opened for signature on 5 September 2024, is the first international legally binding treaty in this field. It is open for signature by the Council of Europe member States, the European Union, and non-member States that participated in its development. In the Article 2, the Convention defines AI as a machine-based system that, for explicit or implicit objectives, infers from the input it receives how to generate outputs such as predictions, content, recommendations or decisions that may influence physical or virtual environments.

Article 3 of the Convention states that its scope covers activities within the lifecycle of AI systems that have the potential to interfere with human rights, democracy and the rule of law, when undertaken by public authorities or private actors acting on their behalf.[11] This means that the Convention does not, by default, apply to all private actors. In relation to other private actors, State Parties retain flexibility – they may choose to apply the principles and provisions of the Convention and take additional appropriate measures to address the risks and impacts arising from their AI related activities. The Convention explicitly excludes from its scope: AI systems related to the

9 Council of Europe Committee on Artificial Intelligence (CAI).

10 Council of Europe, *Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law* (Vilnius: Council of Europe, 2024).

11 The Explanatory Report specifies that the intention is to make the Convention binding on both public and private actors, although some countries advocated for excluding the private sector and limiting the scope of the Convention to activities of public authorities and private actors acting on their behalf.

protection of a Party's national security interests; research and development activities, except where the testing of AI systems or similar activities may potentially interfere with human rights, democracy or the rule of law; and matters relating to national defence.

Chapter III (articles 6-13) of the Convention introduces a set of fundamental principles that establish a framework for mitigating the risks posed by AI. These principles include Human dignity and individual autonomy; Equality and non-discrimination; Respect for privacy and the protection of personal data; Transparency and oversight; Accountability and responsibility; Reliability and safe innovation.

Article 14 and 15 of the Convention oblige State Parties to ensure that relevant information about AI systems with the potential to significantly affect human rights is documented and submitted to authorised bodies. Where appropriate, such information should also be made available or communicated to affected individuals. Additionally, State Parties must introduce measures to ensure that the information provided is sufficient to enable affected persons to challenge decisions made or significantly influenced by such systems. Finally, these measures must guarantee that individuals have effective means to submit complaints to the competent authorities.

Article 16 of the Convention requires signatories to implement regular risk prevention and mitigation measures. This includes monitoring risks and negative impacts on human rights, democracy and the rule of law, documenting these risks, and testing AI systems where necessary - both prior to their initial deployment and following any significant modifications. According to Articles 17-22, the Convention establishes a Conference of the Parties as its follow-up mechanism. Composed of official representatives from each State party, the Conference is mandated to assess the extent to which the Convention is being effectively implemented.

The CAI was also tasked with developing a legally non-binding *Methodology for the Risk and Impact Assessment of AI Systems from the point of view of Human Rights, Democracy and Rule of Law* (HUDERIA) to support the implementation of the *Framework Convention on AI*. Adopted in November 2024, the Methodology[12] provides practical guidance to both public and private actors in identifying, assessing, and addressing the risks that the use of AI systems may pose to human rights, democratic institutions, and the rule of law.

12 Council of Europe, *Methodology for the Risk and Impact Assessment of Artificial Intelligence Systems from the Point of View of Human Rights, Democracy and the Rule of Law (HUDERIA Methodology)*, Strasbourg, November 28, 2024.

### 2.1.2 Guidelines on the responsible implementation of AI systems in journalism

The Council of Europe has also adopted several other binding and non-binding legal instruments addressing the impact and application of digital technologies, social media and AI in the fields of media and journalism.

In November 2023, the Steering Committee on Media and Information Society (CDMSI) adopted the *Guidelines on the responsible implementation of artificial intelligence (AI) systems in journalism*[13]. Developed in parallel with the Council of Europe's *Framework Convention on AI*, these Guidelines aim to operationalise the general principles of the Convention within the specific context of journalism, offering practical recommendations for their responsible application in news production and dissemination.

The document provides practical guidance to news media organisations, technology providers and digital platforms that disseminate news, outlining how AI systems can be responsible used throughout the various stages of journalism production. In its introduction, it emphasises that the protection afforded by Article 10 of the *European Convention of Human Rights (ECHR)* extends to the use of communication technologies, including AI systems, which can enhance and support the vital democratic function of journalism. At the same time, it underlines that Article 10 of the *ECHR* confers both rights and responsibilities on journalists and news media, including the duty to ensure that AI systems are used in ways that uphold human rights and public values.

The text provides a set of recommendations for the use of AI systems across various stages of journalistic production, as well as guidance on the responsibilities of third-party technology providers when collaborating with news organisations:

- How should editorial decisions regarding the implementation of AI systems in news media organisations be made, and what internal procedures should be established to ensure systematic risk assessment?
- What criteria and procedures should be established to ensure the responsible identification and acquisition of AI technology by media organisations?
- How can AI technologies be integrated into professional and organisational routines in a way that retains trained journalists, facilitates their work, and ensures maintained editorial oversight over journalistic content?
- What responsibilities and duties do journalists and news media organisations have towards citizens and the public at large when using AI systems?
- What responsibilities do external technology providers and platforms have when working with news organisations?

13 Council of Europe, *Guidelines on the Responsible Implementation of Artificial Intelligence (AI) Systems in Journalism* (Strasbourg: Council of Europe, March 2024).

In the final section, the Guidelines also outline a set of positive obligations for States to ensure an enabling environment for the protection of human rights and the promotion of media pluralism:

- Establish and diversify funding schemes to support both short and long-term projects aimed at developing responsible journalistic AI systems, with particular attention to the needs of small and local media outlets;
- Encourage independent regulatory authorities or news media self-regulatory bodies to develop guidelines and standards for the responsible use and development of AI in journalism, in order to assist smaller and local media organisations and strengthen their bargaining position vis-à-vis technology providers;
- Mandate independent regulators to review the fairness of commercial relationships and contractual agreements between news organisations, platforms and technology providers - especially to address power imbalances that disadvantage smaller or local media outlets;
- Support transparency and accountability mechanisms, including through (self-) regulatory bodies, to enable public scrutiny of AI use in journalism and promote research into public attitudes and understanding of these technologies and practices;
- Develop initiatives - in collaboration with media organisations, journalists, platforms, communication scholars, and relevant CSOs - to foster media and information literacy among citizens, enabling them to better understand the role and use of AI systems in journalism.

### 2.1.3 Draft-Guidance Note on the Implications of Generative Artificial Intelligence for Freedom of Expression

Under the authority of the CDMSI, the Council of Europe established a Committee of Experts on the Implications of Generative Artificial Intelligence for Freedom of Expression[14]. A preliminary draft Guidance Note prepared by the Expert Committee underwent public consultations in July and August 2025.[15] The Note seeks to strike a balance between harnessing the potential of generative AI and safeguarding freedom of expression. It emphasises transparency, accountability, human oversight, preservation of pluralistic content, and consistency with existing Council of Europe human rights frameworks. Its nonbinding nature points toward practical implementation of relevant measures by policymakers, primarily member States but also technology providers, civil society, and other relevant stakeholders, in line with the European Convention on Human Rights. Its goals are to provide the tools for common understanding of Generative AI-based systems; support the identification and assessment of its structural implications for freedom of expression; and, offer

14 Available at: Committee of Experts on the Impacts of Generative Artificial Intelligence for Freedom of Expression (MSI-AI)

15 Public consultation on the draft Guidance Note on the Implications of Generative Artificial Intelligence for Freedom of Expression, Council of Europe, 1 July 2025.

practical guidance to member States for mitigating risks and enabling a favourable environment for freedom of expression, public debate and media freedom.

Based on the current stage of development of the Guidance Note, it identifies six key areas where structural implications for freedom of expression arise:

a. *Enhancing expression and content access:* Generative AI systems can facilitate the broader dissemination of content, enhance comprehension through interactive content adaptation, and introduce novel ways for individuals to share and receive ideas and opinions.

b. *Diversity and standardisation of expression:* These systems influence the diversity of human expression by potentially standardising content and reducing the uniqueness of individual contributions at scale. At the same time, they can empower new and innovative formats for self-expression.

c. *Integrity of human expression and its attribution:* Generative AI often produces content by statistically synthesising information from multiple sources, frequently without clear attribution. This can distort original content or misattribute sources, posing risks to reputational integrity—especially for individuals and media organisations—and making it harder for users to verify the origin and authenticity of information.

d. *Agency and opinion formation:* By blending sources and detaching information from its original context or author, generative AI can exert persuasive influence over personal beliefs and opinions. These systems may be misused to drive large-scale automated opinion shaping or manipulation, threatening individuals' ability to form and express their own views and undermining cognitive autonomy and the integrity of public discourse.

e. *Media and informational pluralism:* Generative AI applications are reshaping the public information landscape in ways that may compromise the diversity of voices, perspectives, and sources. As these systems increasingly act as intermediaries between the media and the public, they influence which content is visible. Their design and moderation choices directly affect journalistic reach and sustainability—particularly when sources are misattributed or disassociated, and when media outlets are not adequately compensated for the use of their content in AI model training or adaptation.

f. *Market dynamics:* There is noticeable concentration of power at various levels of the generative AI technology stack, especially at the tool and product layers. This concentration—driven by economic or ideological motives—can constrain freedom of expression by leading to inadequate content moderation, as well as filtered, censored, or machine-curated outputs that limit access to diverse viewpoints.

Member States should take proactive measures to ensure that the design, deployment, and use of generative AI applications uphold freedom of expression and effectively mitigate associated risks. The following recommendations offer guidance to support this goal and are organised into four key areas of action:

I. *Observe* the impact of generative AI - Establish robust oversight and testing mechanisms to evaluate both the positive and negative effects of generative AI on freedom of expression. This will support transparency, help uncover biases, and promote responsible data governance.

II. *Assess* - Implement continuous and inclusive freedom of expression impact assessments, including tailored due diligence processes, especially in the context of public procurement.

III. *Enable* the full exercise of expression - Strengthen the conditions for the full exercise and protection of freedom of expression, including through the development and enforcement of socio-technical standards.

IV. *Empower* stakeholders - Adopt a range of measures to build awareness and encourage participatory governance of AI-related risks. This includes promoting citizen assemblies, supporting education and research, publishing impact assessment results, enabling user choice, and fostering international cooperation.

The final version is expected to be submitted for adoption by the Steering Committee on Media and Information Society (CDMSI) by the end of 2025.

## 2.2 Regulatory framework of the European Union

In recent years, the European Union has developed a comprehensive regulatory framework to address the implications of digital technologies and AI systems on freedom of expression, media pluralism and democratic governance across its Member States. At the core of this regulatory approach are two key legislative instruments: the *Artificial Intelligence Act (AI Act)* and the *Digital Services Act (DSA)*.

The *AI Act* primarily seeks to address the impact of AI systems and practices that pose risks to the protection of fundamental rights across various societal domains. While it does not specifically regulate the governance of online platforms in relation to manipulation, disinformation or the safeguarding of freedom of expression and media pluralism, it touches upon these issues by introducing a risk-based classification, oversight, and regulatory regime for AI systems.

In contrast, the *DSA* focuses more directly on the governance of very large online platforms (VLOPs) and online search engines. It addresses systemic risks in four main areas: the dissemination of illegal content; adverse effects on fundamental rights, including freedom of expression and media freedom; negative impacts on civic discourse, electoral integrity and public security; and risks related to gender-based violence, public health and well-being, and the protection of minors. Although the EU's

broader regulatory framework includes additional initiatives and policy documents, this analysis will concentrate specifically on the content and points of convergence between these two central legislative acts, as they relate to the challenges posed by disruptive AI systems to media freedom and media pluralism.

### 2.2.1 EU Artificial Intelligence Act

The *AI Act*[16], described as "the first-ever legal framework on AI", sets out harmonised rules to address the risks associated with AI. According to the official EU communication, the Act "*provides AI developers and deployers with clear requirements and obligations regarding specific uses of AI*", with the aim of "*ensuring that AI systems respect fundamental rights, safety, and ethical principles and by addressing risks of very powerful and impactful AI models.*"[17] The *AI Act* is a core element of the EU's broader policy framework aimed at fostering trustworthy AI.

Although the *AI Act* addresses a broader range of societal implications related to the use of AI, its provisions are nevertheless crucial for safeguarding freedom of expression online. They complement existing EU legislation governing online content, particularly the *DSA*. This is especially important given that contemporary online communication increasingly relies on AI systems, with synthetically created images circulating widely across social media platforms.

The provisions of the *AI Act* are expected to significant affect the use and dissemination of online content in two key ways: (1) by prohibiting certain forms of AI-based manipulations that could undermine the right to hold opinions – a fundamental aspect of freedom of expression; (2) by imposing obligations on those using AI to generate synthetic content, including deepfakes.

Regarding the first type of impact, Article 5(1)(a) of the Act[18] prohibits the deployment of subliminal and intentionally manipulative or deceptive techniques that may materially distort a person's behaviour by "appreciably impairing a person's ability to make an informed decision, thereby causing a person to take a decision that that person would not have otherwise taken," potentially resulting in significant harm. This prohibition applies to the 'placing on the market', 'putting into service' or 'use' of such AI system. Examples of subliminal techniques include visual messages flashed too quickly for conscious perception, auditory subliminal messages, subvisual and subaudible cues, embedded images, misdirection and temporal manipulation. Exceptions are made for lawful persuasion, such as personalised recommendations based on transparent algorithms and user preferences[19].

16 European Union. Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act).

17 Official page of the Artificial Intelligence Act.

18 See more details at: https://artificialintelligenceact.eu/article/5/.

19 European Commission, *Guidelines on Prohibited Artificial Intelligence Practices, Established by Regulation (EU) 2024/1689 (AI Act)* (Brussels: European Commission, February 2025).

Next, Article 5(1)(b) of the Act, prohibits the exploitation of individuals' vulnerabilities – such as those related to age, disability, or specific social or economic circumstances - with the intention or effect of materially altering their behaviour in a way that could cause significant harm. This provision applies to AI systems that either directly interact with individuals (for example chatbots) or deliver content recommendations. The prohibition covers the 'placing on the market', 'putting into service', or 'use' of such AI system. Vulnerable groups are defined as those more susceptible to influence or manipulation by AI, including children and teenagers, elderly persons, and individuals with cognitive, mental, or physical disabilities.

This provision is relevant across various sectors where AI may interact with vulnerable populations, including advertising, healthcare, financial services, gaming and online entertainment, social media and influencer marketing, as well as education and learning platforms. Exceptions apply to AI systems that are unlikely to cause significant harm, such as those designed to enhance user engagement without employing manipulative or deceptive practices; systems recommending music while avoiding exposure to depressive songs; AI employing subliminal techniques to encourage healthy behaviours, such as smoking cessation; and AI simulating phishing attempts to educate users about cybersecurity threats etc.[20]

Regarding the second anticipated impact, Article 50 of the *AI Act*[21] imposes transparency obligations on providers and deployers of AI systems, especially those designed to interact with individuals or generate content that may pose risks of manipulation and deception. To address these concerns, the Act establishes strict transparency requirements: individuals must be informed when they are interacting with an AI system, unless this is obvious from the context; furthermore, individuals must be notified if AI systems analyse their biometric data to detect emotions, intentions or assign them to specific categories. Provisions related to labelling of AI-generated content are especially important in minimising risks of manipulation and deception, particularly in the context of combating the spread of deepfakes and misinformation.

With full enforcement of the *AI Act* scheduled for 2 August 2026, the European Commission has initiated a parallel process of voluntary compliance by promoting the *AI Pact*[22], which encourages industry stakeholders to commit voluntary to the *AI Act* and begin implementing its provisions ahead of the legal deadline. In the meantime, several technology companies have updated their AI policies voluntarily: TikTok and Meta have introduced specific rules to limit the misuse of AI, while Google has started labelling AI-generated images and expanded its system to detect AI-generated content in advertisement.

20 Ibid.

21 See more details at: Article 50 of the AI Act.

22 See more details on this on the AI Pact web page.

### 2.2.2 Intersection between AI Act and DSA

The *DSA*[23] requires providers of VLOPs and VLOSEs to conduct annual risk assessments examining how their recommender and content moderation systems affect freedom of expression, media pluralism and other specific risks areas (Article 34). These annual risk reports must also evaluate the potential impact of such systems on media freedom and pluralism. The *DSA* provisions (Article 34 and Recital 70) specifically aim to address systemic risks arising from the spread of disinformation via online platforms and search engines, with particular emphasis on potential consequences for electoral integrity, democratic institutions, and public order. Additionally, Recital 84 provides detailed guidance for platforms on assessing how algorithmic amplification and curation may influence content visibility, restrict access to diverse perspectives, or otherwise limit information diversity.

Under Article 35, the *DSA* requires platforms and search engines to implement reasonable, proportionate, and effective measures to mitigate identified risks. The legislation outlines a range of possible actions, including increased transparency in digital advertising, collaboration with independent researchers and trusted flaggers and support for self-regulatory initiatives that promote cooperation between platforms, authorities, and civil society. One example is the *Code of Practice on Disinformation*, which was initially introduced as a voluntary initiative but is now established under the *DSA* as a binding *Code of Conduct*.[24]

The provisions of the *AI Act* concerning prohibited AI systems and practices intersect with the *DSA*'s objective to prevent the dissemination of "illegal content" on online platforms and search engines. While the *AI Act* does not regulate content per se, from the prospective of the *DSA*, it aims to curb the spread of illegal content generated through prohibited AI practices. The *DSA* imposes obligations on online platforms to establish mechanisms for flagging potentially illegal content through cooperation with trusted flaggers (the notice and action mechanism, Article 16) and to comply with requests from competent authorities (Digital Service Coordinator) to remove flagged illegal content (Article 9). The enforcement of these provisions is likely to enhance oversight of AI use on online platforms by involving third parties – trusted flaggers, individual users and competent authorities - in detecting, assessing, flagging and seeking the removal of illegal content. However, concerns remain that these measures may not effectively eliminate the prohibited AI practices responsible for producing such illegal content[25].

Another area where the *DSA* and the *AI Act* intersect is the risk of manipulation of individuals, although their approaches to addressing this risk differ. The *AI Act* focuses

23 European Union. Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act) (Text with EEA relevance).

24 R.M. Torraco, *Risk in the Digital Services Act and AI Act: Implications for Media Freedom, Pluralism, and Disinformation* (Florence: Center for Media Pluralism and Media Freedom, May 2025).

25 L.L. Cabrera, *A Series on the EU AI Act Pt. 3 – Freedom of Expression* (Brussels: Center for Democracy and Technology, May 2024).

specifically on manipulative and misleading practices arising from the application of AI systems, whereas the *DSA* concentrates on practices by online platforms that distort or impair individuals' ability to make autonomous and informed choices or decisions. There are also notable differences in the definitions and legal thresholds between the two Acts: the *DSA*'s definition of manipulation does not require proof that the individual would have otherwise made a different decision, nor does it require evidence of potential significant harm resulting from exposure to the harmful content. Consequently, the concept of manipulation under the *DSA* is broader in scope but its application is narrower, applying exclusively to online platforms.[26]

Regarding manipulative practices, the *AI Act*, in Recital 136, explicitly recognises mentions AI-generated disinformation as a significant threat to electoral and democratic processes. To address this issue, providers and deployers of general-purpose AI systems that generate synthetic content - such as text or images – are required to clearly identify such content outputs as artificially produced. These transparency obligations for AI systems providers are crucial in supporting the enforcement objectives of the *DSA* particularly concerning very large online platforms and search engines.

Another area where the two Acts intersect concerns recommender systems. The *DSA* explicitly defines a 'recommender system' as a fully or partially automated system used by an online platform to suggest or prioritise information to users. Although the *AI Act* does not explicitly mention recommender systems, it reasonably implies that such systems fall within its definition of AI systems. The *AI Act* further specifies that the deployment of AI systems may be classified as "high-risk" in certain areas, including cases where the recommender systems are used to influence the outcome of elections or referendums. However, it is important to note that the *AI Act* does not significantly increase the strictness of the existing provisions, as the *DSA* already imposes stringent requirements on online platform providers to adjust their recommender systems accordingly.

In conclusion, both Acts adopt distinct yet complementary approaches to addressing the risks posed by the application of AI systems to freedom of expression and media freedom. The *DSA* focuses on how online platforms shape the dissemination of content and thereby impact freedom of expression and media pluralism. Conversely, the *AI Act* primarily regulates the underlying technologies that generate such content. However, it remains to be seen how the interaction between these two Acts will effectively address the specific vulnerabilities faced by the media sector.

26 Ibid.

# 3. Application of AI in the audiovisual sector – comparative experiences and examples

The application of AI in the audiovisual sector presents tremendous opportunities for enhancing creativity and streamlining content creation processes. With the advent of generative AI, a new realm of possibilities has emerged — benefiting not only creators of original audiovisual content but also journalists and media professionals in newsrooms. Generative AI enables the swift and effortless production of texts, visuals, and other forms of content that once demanded the collective effort of entire editorial teams.

However, as in other sectors, the introduction of AI in the media landscape has been met with both enthusiasm and apprehension. On one hand, professional media outlets see great potential in AI to enhance journalism by streamlining ad supporting key tasks – particularly in areas such as investigative journalism and data-driven reporting, where AI can help and analyse vast volumes of information more efficiently. On the other hand, there are growing concerns that AI-generated outputs could erode public trust, disrupt traditional business models, and devalue the human expertise that underpin quality journalism.

This chapter begins by examining the opportunities that AI presents for newsrooms, alongside the challenges, potential risks, and ethical dilemmas associated with its use. The second section provides an overview of recent research on the current state of AI adoption in journalistic practice. Finally, the third section highlights examples of leading global news organisations that have successfully integrated AI in innovative ways to enhance the quality and efficiency of their content production.

## 3.1 Opportunities and challenges of AI application in news media

Overall, a significant gap persists between the rapid evolution of AI technologies and the capacity of news media to fully explore, understand and evaluate the potential benefits and risks of adopting emerging tools and models. In the third year since the launch of ChatGPT, a notable shift has taken place — moving from the predominant use of AI as a supportive tool during the initial years to granting AI systems increasing in content creation. At the same time, there have been substantial improvement in services such as automatic translation and text transcription, including for languages with relatively small speaker populations.

Competition within the AI sector has led to the emergence of AI systems that are increasingly accessible and cost-effective, lowering the barrier to entry for smaller organisations, including media outlets. The long-standing dominance of Silicon Valley tech companies is now being challenged by the rise of competing technology firms, particularly from China. In January 2025, a new open-source large language

model (LLM)[27] was launched, offering comparable functionality to proprietary models at a fraction of the cost. Another major development in 2025 was the introduction of so-called "agentic artificial intelligence." Unlike conventional AI assistants that serve primarily as support tools, agentic AI can independently plan, optimise, and execute sequences of tasks to achieve defined objectives - without human intervention. These systems are designed to evaluate and compare information sources, potentially enhancing the reliability of the content they generate. For journalism, this evolution raises both opportunities for more efficient news production and serious questions around editorial control, verification, and accountability.

Since the introduction of ChatGPT, news media around the world have actively explored, tested, and implemented AI tools, seeking to harness their potential while minimising risks and upholding professional standards. A key concern has been how to adapt established editorial principles – particularly those related to fact-checking and verification – to the new realities of AI-generated content. The world's major professional media, especially public service media, are acutely aware that the unchecked use of such content could lead to the dissemination of inaccurate or misleading information, potentially causing confusion and eroding public trust.

Within the European context, public service media bear a particular responsibility in the adoption of AI, given their mandate to reflect diverse perspectives, serve all segments of society, and remain accountable to the public.[28] Much like the early days of the internet, a key challenge now is determining how generative AI can be leveraged to support this mission while maintaining and strengthening audience trust. In addition to integrating AI responsibilities into their operations, public service broadcasters also play a vital role in educating the public about the broader implications of generative AI. This includes raising awareness of how such technologies are reshaping the information ecosystem.

A growing number of public and private news media outlets are carefully and responsibly exploring ways to improve the efficiency of news production, expand audience reach, and enhance the overall value of journalism. A recent study published by the European Broadcasting Union (EBU) in April 2025,[29] sheds light on how newsrooms perceive and experience the integration of AI into their production processes. The findings provide valuable insights into both the opportunities and the concerns that media professionals face as they navigate this evolving landscape, such as:

- Newsrooms are increasingly adopting AI tools to enhance their workflows, either by adapting GPT-based models or by using AI features integrated into their internal content management system (CMS). These tools support the creation, editing, publication, and distribution of content across online

27 Bertin Martens, *How DeepSeek Has Changed Artificial Intelligence and What It Means for Europe*, Policy Brief 12/2025 (Brussels: Bruegel, 2025).

28 European Broadcasting Union, *Trusted Journalism in the Age of Generative AI*, *EBU News Report* (Geneva: European Broadcasting Union, 2024).

29 European Broadcasting Union, *Leading Newsrooms in the Age of Generative AI* (Geneva: European Broadcasting Union, 2025).

platforms. Additionally, AI is used to optimise website appearance across different user devices, personalise news delivery, and structure or encourage user-generated contributions.

- AI is frequently applied to routine and less complex tasks such as translation, transcription, and subtitling. These applications have led to notable improvements in content quality and production efficiency, requiring significantly less manual effort.
- Editors generally remain cautious about using AI for producing more sophisticated content, mainly due to concerns over the accuracy and reliability of AI-generated information. While some technical solutions exist to address these issues, they often require additional resources. Maintaining a "human-in-the-loop" remains essential to ensure editorial oversight and content integrity.
- Journalists in newsrooms express a growing interest in using AI tools. However, there is a widespread perception that media organisations are not investing sufficiently in training journalists to effectively leverage AI for enhancing story quality and journalistic output. 30

However, global experience shows that many private media outlets use AI without adequate editorial oversight, clear guidelines, or transparency regarding the publication of AI-assisted content. This practice is particularly prevalent in certain countries, largely due to the absence of effective national-level regulatory or self-regulatory frameworks designed to address disinformation and safeguard journalists and media organisations' copyright and related rights. In response to these challenges, the European Broadcasting Union — representing public service media across Europe — has recently launched an initiative to develop a Code of Good Practice aimed at AI platforms, with the goal of promoting responsible AI use and protecting journalistic integrity.

Another significant challenge facing media organisations is securing the necessary funding to invest in AI technologies and developing sustainable business models around their use. Most specialised AI systems are branded, requiring costly licensing fees or subscriptions payments to technology providers. Even in more developed markets, where media outlets have larger audiences, uncertainty remains about whether AI investments will ultimately enhance their financial sustainability, given the substantial upfront and ongoing costs involved.

In May 2025, thousands of public and private media outlets worldwide joined the *Information Integrity in the Age of AI*[31] initiative, launched jointly by the European Broadcasting Union and the News Media Publishers Association. The initiative calls on AI system developers to engage in constructive dialogue and cooperate with media organisations to combat disinformation and uphold the principles of professional

30 Ibid, page 3.

31 EBU Press Release, Media outlets worldwide join call for AI companies to help protect news integrity, May 2025.

and credible journalism. Central to the initiative is the proposed adoption of a joint Code of Practice based on five key principles[32]:

- News content may only be used in generative AI models and tools with the explicit authorisation of the original content creator;
- The value of up-to-date, high-quality news content must be fairly recognised and compensated when utilised by third parties;
- Accuracy and attribution are essential: the original news source behind AI-generated material must be clearly identified and accessible to the public;
- Embracing the plurality of news media will significantly enhance the quality and reliability of AI-driven tools;
- Technology companies are encouraged to engage in formal dialogue with news organisations to establish standards for safety, accuracy and transparency.

## 3.2 Research on the application of AI in news media

In November and December 2024, the Reuters Institute conducted a survey involving 326 respondents (journalists, editors, and executives) from traditional and digital news media in 51 countries.[33] The study provides comprehensive insights into how generative AI is transforming newsroom operations. Remarkably, 87% of respondents reported that their newsrooms had been partially or fully transformed by the use of generative AI during 2024. In several larger news organisations, formal principles and guidelines governing AI use have already been established, alongside the creation of specialised roles dedicated to leveraging AI to enhance newsroom operations workflows.

According to the Reuters survey, the application of AI remains primarily focused on preparatory tasks (back-end automation) and the use of recommendation systems, rather than on core activities such as content creation and information gathering. However, preparatory activities saw significantly increased use in 2024 compared to the previous year, most commonly including tasks such as creating summaries, testing headlines, editing texts, transcribing audio material, translating, generating images, and more. Overall, these findings suggest that AI is predominantly employed as a tool to enhance efficiency and productivity, without fundamentally altering the way newsrooms operate.

The survey also revealed that, as media outlets grow more confident in AI technologies, they are expected to increasingly focus on using AI to transform content formats to better meet audience needs (audience-facing format transformations). For instance, advancements in voice technologies enable the conversion of text content into audio formats in multiple languages, prompting most publishers (75%) to indicate plans to

32 Ibid.

33 Nic Newman and Federica Cherubini, *Journalism, Media, and Technology Trends and Predictions 2025* (Oxford: Reuters Institute for the Study of Journalism, University of Oxford, January 2025).

expend their use of this AI capability. Additionally, 70% of respondents intend to use AI more frequently for creating article summaries, over half (56%) plan to use chatbot or AI tools for audience interaction, and approximately one-third (36%) express interest in experimenting with converting text-based stories into video formats.

For audiovisual media, the opportunities AI offers for repurposing video content are particularly noteworthy. For example, OpusClip AI transforms lengthy recordings of debates or interviews into short clips optimised for viral sharing on platforms such as TikTok, YouTube Shorts, and Reels. It can automatically select the most relevant segments, adjust the aspect ratio from horizontal to vertical, and add subtitles and effects tailored to each specific platform. Given the diversity of distribution channels, tools that enable efficient repurposing of video content are likely to become increasingly valuable for media outlets in the future.

Another comprehensive study was conducted by the Thomson Reuters Foundation in October 2024, examining AI adoption and the attitudes of 221 respondents from 76 countries across the Global South and developing nations[34]. The authors emphasise that this geographic focus is important, as access to technology and journalists' perceptions of AI vary significantly between countries. Consequently, the study offers valuable insights that differ from the perspective commonly presented in discussions centred on the Global North and more developed economies.

*AI adoption in newsrooms:* The study's findings indicate widespread adoption of AI technologies across newsrooms, with over 80% of respondents reporting the use of AI in their journalistic work, and nearly half using AI tools daily. AI is applied to a variety of tasks including content creation and editing, research, transcription, translation, fact-checking, and idea generation. These tools have the potential to help journalists save time, expend their audiences, and enhance productivity. ChatGPT emerges as the most widely used AI tool.

*Employee attitudes toward AI integration:* Despite the widespread adoption of AI in newsrooms, only 13% of organisations have implemented internal guidelines governing its use in the workplace. Nearly half of respondents (47.6%) stated that their company holds a neutral stance on AI adoption in their workflows. Around 22.6% indicated that their organisation actively encourages the use of AI, while a similar proportion (24.5%) supports it, but with caution. A small minority (5.3%) reported that their organisation opposes the integration of AI technologies.

*Impact of AI on newsroom transformation:* Over the past 18 months, more than half of respondents (52.4%) stated that AI has had a significant impact on their work. A further 25.3% stated that AI has somewhat influenced their workflows, while a smaller portion (9.4%) felt it was too early to access the effects of AI integration on their newsroom operations.

34 Damian Radcliffe, *Journalism in the AI Era: Opportunities and Challenges in the Global South and Emerging Economies* (London: Thomson Reuters Foundation, January 2025).

*Barriers to using AI:* Just under one-fifth of respondents (18.3%) stated not using AI in their work. The most cited reasons included a lack of knowledge, insufficient training and support from their newsroom, limited access to technology, and concerns over the credibility and accuracy of AI-generated content. Among those who do use AI, the majority (57.6%) indicated that they had taught themselves to use these tools, often without adequate training provided by their organisation. Respondents also highlighted the risk of bias in leading AI models, which are predominately trained on English-language data from Western sources. In an environment where a digital divide already exists between newsrooms in developed and less developed countries, this presents an additional threat of exacerbating existing disparities.

*Concerns and risks related to the use of AI in journalism:* Journalists, editors, and other media professionals surveyed expressed significant concerns about the long-term negative effects of AI on the industry. Over half (54.3%) worry about the potential decline in creativity and originality in journalistic reporting, while 51.4% fear erosion of critical thinking skills. Nealy half (49%) are concerned about the increased risk of disinformation dissemination facilitated by AI technologies.

*Attitudes toward the future of AI in journalism:* Despite nearly half of the respondents regularly using AI tools, more than half (53.4%) expressed strong concerns about the ethical use of AI within journalism. A majority believe there is a pressing need for clear ethical guidelines, specialised AI training, and a regulatory framework tailored specifically to the journalism sector.

## 3.3 Examples of AI implementation in news media

In two studies published by the European Broadcasting Union in 202435 and 202536, numerous examples illustrate how news media worldwide are experimenting with or actively implementing AI tools within their newsrooms. These cases reveal a shared, deliberate effort among professional news organisations to connect AI in ways that add new value to their service for audiences. The following sections highlight selected examples of AI adoption in both public and private audiovisual media.

35 European Broadcasting Union, *Trusted Journalism in the Age of Generative AI*, *EBU News Report* (Geneva: European Broadcasting Union, 2024).

36 European Broadcasting Union, *Leading Newsrooms in the Age of Generative AI* (Geneva: European Broadcasting Union, 2025).

**Example 1:** Enhancing the protection of source identities in the programs of the French public broadcaster — ***France Télévisions***

Editors at the French public broadcaster *France Télévisions* have employed AI to advance techniques for anonymising the voices and faces of information sources, aiming to bolster the security of source protection. During consultations with experts, they identified a significant risk: AI technologies could potentially be misused to reconstruct the appearance of blurred interviewees, thereby compromising anonymity.

To mitigate these risks, France Télévisions urgently adopted a Charter of Good Practices applicable to all internal and external productions. This Charter mandates robust anonymity measures at every stage of the production process - from the recording of interviews to post-production- requiring the use of advanced masking techniques for both voice and facial features. Additionally, a mandatory online training module was introduced for approximately 5,000 employees, representing over half of the broadcaster's workforce. Further protective measures include restricting access to audiovisual archives held by the National Audiovisual Institute of France (Institut National de l'Audiovisuel), which ceased selling any content featuring anonymisation. Finally, France Télévisions initiated research into new technological solutions to further strengthen the implementation of the Charter's best practices.

Source: *Trusted Journalism in the Age of Generative AI*, EBU News Report, 2024, page 78

**Example 2: Enhancing sports coverage on the *BBC Sport* website**

The British public broadcaster, BBC Sport, decided to expand live football match coverage on its website, which delivers real-time updates to mobile audiences on the latest sports developments. Previously, editorial teams manually listened to and transcribed audio commentaries to include them in sports reports, limiting the volume of matches they could cover.

To streamline this process and increase coverage, the BBC development team created a tool that automatically transcribes live audio commentaries and using the transcripts, extracts relevant quotes and generates summaries. The prototype connects live-streamed audio to transcription model, which then feeds into GPT-4. This AI generates summaries of key events and extracts illustrative quotes. These outputs, together with the full transcript, are provided to sport editors who review and edit the content before publication.

Four pilot formats targeting specific audiences were tested using this tool. To maintain transparency, the BBC informed users during the pilots that AI technology was being employed to enhance sports content delivery. The pilots proved successful, with the four live match pages attracting over 900,000 views.

Source: *Leading Newsrooms in the Age of Generative AI*, EBU News Report, 2025, page 33.

**Example 3**: Generating new story angles based on audience needs at Swiss public broadcaster – ***Radio Television Suisse***

When an event is covered over several consecutive days, finding fresh angles for follow-up stories can be challenging and is often overlooked. Yet, maintaining audience interest through varied perspectives is crucial for newsrooms. This approach to tailor story angles to specific audiences was initially pioneered by the BBC.

Building on this idea, the Swiss public broadcaster Radio Television Suisse (RTS) developed an AI model trained on diverse data sources - including news articles, audio, and video content. The model incorporates journalists' requirements alongside the newsroom's editorial charter principles. It categorises each piece of content according to the audience needs it fulfills, such as informing, entertaining, inspiring, connecting, or helping. This AI model is embedded within an application called BakerStreet, which links to various RTS content streams. BakerStreet automatically analyses new content and identifies the primary audience needs each piece addresses. The integration of AI into BakerStreet generated significant interest among journalists and production teams eager to understand how their content met audience expectations. The tool has profoundly influenced RTS's content production model by centring it on audience needs. However, continuous editorial input remains essential: journalists must actively review and refine the labelled content, thereby improving AI accuracy and deepening their insights into of audience preferences.

Source: *Leading Newsrooms in the Age of Generative AI*, EBU News Report, 2025, page 40.

**Example 4**: Enriching radio content while reducing production costs at the private US radio station - ***Futuri AudioAI***

Amid shrinking media budgets and growing demand for fresh content, some private media outlets are leveraging AI to enhance human creativity and reduce content production costs. The US-based private radio station Futuri, now rebranded as Futuri AudioAI, has used GPT technology to assist its overburdened creative teams in producing more content within budget constraints. The station's products now include AI-generated voices delivering regular weather updates and short news bulletins. AI is also used to generate commercial spots and even host entire shows, featuring AI DJs.

Futuri occasionally fills programming segments using cloned voices of its own presenters. The Futuri AudioAI tool replicates hosts' voices in a manner that sounds human and human-like on air. A major challenge was overcoming the monotonous tone common to earlier text-to-speech technologies, instead creating speech rich in unique characteristics and emotional nuance.

The station's TopicPulse segment uses machine learning to monitor real-time trends on Instagram, X (Twitter), Facebook, and over 250,000 news sources, enabling the delivery of stories tailored to audience interests.

Source: *Trusted Journalism in the Age of Generative AI*, EBU News Report, 2024, page 90.

**Example 5:** Improving content inclusivity at the Dutch public service broadcaster - ***NPO/Omroep Zwart***

A fundamental responsibility of public service broadcasters is to represent and engage all segments of society. However, journalism often tends toward content homogenisation, catering primarily to the majority audience's preferences. This can result in the needs and perspectives of certain societal groups being neglected or underrepresented. While focus groups are typically used to gather audience feedback, organising them is both costly and logistically challenging.

To address this, the Dutch multimedia platform NPO/Omroep Zwart, part of the Dutch public broadcasting system, developed an innovative initiative known as Project AAVA. This project creates "digital twins" – AI-generated virtual representations of different audience segments – to ensure that public media reflects a broad spectrum of views and experiences.

The project uses AI-generated and AI-managed digital personas to identify and integrate missing perspectives into the creative process. The initiative is founded on interdisciplinary collaboration among researchers, journalists, and experts in the ethical use of AI. It utilises open-source AI models such as LLaMA 3 and locally adaptable GPT-based models, combined with anonymised data representing diverse demographic, behavioural, and contextual audience characteristics.

Early findings from Project AAVA demonstrate significant potential for AI as an additional editorial tool in public media. The findings indicate that AI-generated insights help content creators identify misrepresentations of specific social groups, improve inclusivity, and deepen understanding of the sensitivities of different audience segments.

Source: *Leading Newsrooms in the Age of Generative AI*, EBU News Report, 2025, page 38.

# 4. Application of artificial intelligence in the audiovisual sector of the Republic of North Macedonia

## 4.1 General context: The state of AI in the media sector in North Macedonia

The application of AI in the audiovisual sector in the Republic of North Macedonia remains at an early developmental stage and is currently implemented largely without strategically established policies or a defined legal-institutional framework. Such a framework would be essential both to foster technological advancement and to safeguard fundamental rights and democratic values. While global trends demonstrate advanced integration of AI in automating journalistic processes, data analysis, and content creation, the domestic application of AI continues to be fragmented, relying predominately on isolated and inconsistent practices.

In recent years, there have been initial steps towards addressing the ethical and professional dimensions of AI use in journalism. A significant milestone is the *Regional Declaration "AI as assistance, never as a substitute for human judgment,"*[37] adopted in May 2025 in Ohrid by media ethics councils from the Western Balkans and Türkiye. This declaration underscores the importance of transparency, clear labelling of algorithmically generated content, and mandatory risk assessments - particularly in sensitive societal contexts.

The establishment of the association AI Now[38] further contributes to raising public awareness and developing expertise on the responsible use of AI. In their publication *"Ethics and Bias in Artificial Intelligence"*[39], the association emphasise the key role that the media play in promoting fairness and transparency in AI usage by informing the public and encouraging critical reflection on its ethical dimensions.

In parallel, the country is undertaking a comprehensive revision and update of the *Journalists' Code of Journalists*[40], involving the Association of Journalists of Macedonia (AJM), the Council of Media Ethics of Macedonia (CMEM), and the Macedonian Institute for Media (MIM). A key innovation in this revision is the inclusion of specific provisions addressing the ethical application of AI in the media, thereby establishing a foundation for the responsible use of new technologies and the protection of the public interest.

37 Council of Media Ethics of Macedonia, *Regional Declaration: AI as an Assistant, Never as Replacement for Human Judgement*, 2025.

38 The association was established in 2025, and its mission is to promote research, development, education, as well as the ethical use of AI in the country.

39 Suad Seferi, Sead Dzigal, and Sanja Adzaip Velickovski, *Ethics and Bias in Artificial Intelligence: Challenges and Opportunities for the Republic of North Macedonia and the Region* (Skopje: AI Now – Association for Artificial Intelligence, 2025).

40 Association of Journalists of Macedonia, Code of Journalists.

As part of this initiative, MIM prepared and published the analysis *"From global experiences to local standards: Ethical challenges and solutions in journalism"*[41], which provides a comparative overview of international practices and identifies key areas for advancing media ethics within the domestic context. The analysis pays particular attention to challenges posed by new technologies and AI, emphasising the need to supplement the Code with clear rules on transparency, prevention of algorithmic bias, and protection of pluralism. At the same time, a publication by the AJM, *"A thorough review of current ethics practices in journalism in North Macedonia"*[42], reveals that, despite high awareness of the potential risks linked to automation and AI, newsrooms still lack formal policies or internal protocols to ensure their responsible use.

In the context of these research findings and identified policy gaps, the activities of the Institute for Communication Studies (ICS)[43] play a vital role in fostering critical public debate and promoting a cross-sectoral approach to media literacy and the responsible integration of AI. Through organising specialised events and educational platforms, the Institute broadens expert perspective and facilitates greater involvement from academic and civil society in identifying and addressing ethical risks.

In this regard, initiatives by the Metamorphosis Foundation, such as the debate titled *"Ethics in Artificial Intelligence: Balancing Innovation and the Protection of Human Rights Online"*[44], emphasise the importance of transparency and maintaining high ethical standards when integrating AI into the journalistic content production.

Although these initiatives signify growing awareness and the professional community's willingness to confront the challenges posed by new technologies, self-regulation remains limited at this stage, largely confined to general commitments and declarative support. These gaps highlight the urgent need for more in-depth discussions on developing functional policies, clearly defined protocols, and frameworks for continuous education. Such measures would lay the foundation for a more systematic and responsible integration of AI into the media sector, thereby protecting the public interest and strengthening journalists' professional autonomy.

## 4.2 Decisions and strategies for AI implementation

Managing the integration of AI in newsrooms requires a thoughtful and strategic approach, firmly grounded in clearly defined ethical values, the organisation's mission, and the public interest that media must uphold while fulfilling their societal role. According to the Council of Europe's *Guidelines on the responsible implementation of artificial intelligence (AI) systems in journalism*,[45] it is crucial that decisions concerning

41 Marina Tuneva, *From Global Experiences to Local Standards: Ethical Challenges and Solutions in Journalism* (Skopje: Macedonian Institute for Media, 2024).

42 Aleksandar Manasiev, *A Thorough Review of Current Ethics Practices in Journalism in North Macedonia* (Skopje: Association of Journalists of Macedonia, 2024).

43 See more details at: International Symposium "*Media Literacy in the Age of AI: Redefining the Possible*", Institute of Communication Studies, February 2024.

44 See more details at: *Ethics in Artificial Intelligence: Balancing Innovation and Protection of Human Rights on Internet*, November 2023.

45 Council of Europe, *Guidelines on the Responsible Implementation of Artificial Intelligence (AI) Systems in*

the introduction of AI are led by editors in a transparent and strategic manner, aligned with the broader mission of the media outlet.

### *Lack of strategic approach and formalised policies in newsrooms*

In the newsrooms of the audiovisual sector in the Republic of North Macedonia, strategic policies for AI are almost entirely absent. Interviewed journalists and editors confirm that the current use of AI depends largely on individual initiatives and *ad hoc* decisions, with no unified internal policies or formalised procedures in place. As one interviewee noted: "We don't have a formal AI policy; its use is driven more by curiosity than by a strategic vision."[46] This gap highlights a significant disconnect between global recommendations and local practices, fostering conditions that may lead to inappropriate or unpredictable AI use in newsrooms and thereby increasing the risk of ethical and professional compromises.

The absence of a systematic approach has resulted in AI being perceived and used primarily as a technical tool for facilitating routine operational tasks, rather than as an integrated component of the newsroom's wider editorial strategy and value system. One of the most pronounced structural weaknesses in domestic newsrooms is the lack of formalised policies and unified internal protocols for AI implementation, which further reduces their ability to ensure consistency and foster trust with audiences. This limited and fragmented approach weakens newsrooms' capacity to maintain stable communication and credibility with the public, deliver continuous and sustainable quality, and uphold content integrity within a media ecosystem increasingly influenced by algorithmic processes.

Additionally, insights gathered from the interviewed journalists in this analysis reveal challenges similar to those outlined in this year's global report by the European Broadcasting Union,[47] which highlights that despite enthusiasm among some journalists and editors to experiment with AI, organisational structures and shared policies remain underdeveloped. This model of "individual initiative without a centralised vision" results in fragmented implementation and inconsistent standards, rather than coordinated and strategically guided development.

### *The role of editorial leadership is key*

One of the key prerequisites for the responsible implementation of AI is the active and strategic involvement of editorial leadership, supported by clearly defined coordination of processes. According to the Council of Europe's *Guidelines on the responsible implementation of AI systems in journalism*, ultimate responsibility for AI integration should rest with editors and management structures, who are primarily charged with safeguarding editorial independence and the public interest. However, field observations indicate that many newsrooms lack designated individuals

*Journalism* (Strasbourg: Council of Europe, March 2024).

46 Interview with a journalist from a national TV, conducted on 27.05.2025.

47 European Broadcasting Union, *Leading Newsrooms in the Age of Generative AI* (Geneva: European Broadcasting Union, 2025).

or specialised departments to assume this strategic and ethical responsibility.[48] This absence results in fragmented decision-making and increases the risk of unpredictable and potentially harmful situations arising from the incidental use of AI in the production process.

Furthermore, the absence of a so-called "process owner", a role recommended by the Council of Europe, indicates the lack of a designated individual or team responsible for integrating technological, ethical, and legal dimensions into a unified and coherent strategy. The process owner would play a vital role in defining clear editorial policies, establishing systems for continuous monitoring and evaluation, and ensuring effective coordination between departments and across professional profiles within the newsroom.[49] The lack of such a structure results in fragmented responsibility and limited capacity to proactively manage risks, thereby undermining the newsrooms' ability to uphold professional integrity and maintain public trust.

### *Risk assessment and transparency*

One of the fundamental pillars emphasised in the Council of Europe's *Guidelines on the responsible implementation of AI systems in journalism* is the obligation for media outlets to conduct a comprehensive and systematic risk assessment prior to introducing such technologies. This process includes an in-depth analysis of potential risks to content accuracy and credibility, the protection of privacy, the emergence of algorithmic bias, as well as the broader implications for human rights and the public interest.

In the local context, insights from interviewed experts clearly indicate that mechanisms for risk assessment have yet to be established in newsrooms. Although there is some awareness of potential risks, this generally remains at the level of individual perceptions or personal judgements rather than being developed into systematic and standardised procedures within editorial practices.[50] This is also corroborated by the analysis *"A thorough review of current ethics practices in journalism in North Macedonia,*[51]*"* which highlights that despite growing awareness among editors and journalists, formal policies and protocols enabling systematic risk management and regular assessment are still lacking. Additionally, the MIM analysis *From Global Experiences to Local Standards: Ethical Challenges and Solutions in Journalism*[52] emphasises that maintaining media integrity depends on newsrooms' ability to act proactively by identifying and addressing risks arising from the application of new technologies in a timely manner, especially in sensitive and high-risk societal contexts.

48 Interview with Dragan Sekulovski, Executive Director of AJM, conducted on 13.06.2025.

49 Council of Europe, *Guidelines on the Responsible Implementation of Artificial Intelligence (AI) Systems in Journalism* (Strasbourg: Council of Europe, March 2024).

50 Interview with Biljana Petkovska, Director of MIM, conducted on 14.06.2025.

51 Aleksandar Manasiev, *A Thorough Review of Current Ethics Practices in Journalism in North Macedonia* (Skopje: Association of Journalists of Macedonia, 2024).

52 Marina Tuneva, *From Global Experiences to Local Standards: Ethical Challenges and Solutions in Journalism* (Skopje: Macedonian Institute for Media, 2024).

At the same time, the experts' insights further emphasise the importance of careful, multiple, and independent verification of any content created or supported by AI tools. The lack of formally established mechanisms can contribute to the spread of disinformation and further increase the risk of marginalising certain groups, particularly if algorithms are trained on limited or biased data. Additionally, excessive reliance on journalistic content production risks what is known as "cognitive offloading," a phenomenon where journalists' creative and analytical capacities gradually diminish, weakening their ability to think critically and safeguard the public interest.[53]

Global experiences further highlight the necessity for transparent and publicly accessible policies as a key prerequisite for safeguarding ethics and the public interest, particularly in smaller and more vulnerable media markets where resources and expertise are limited.[54] Such policies require more effective internal control within newsrooms, which in turn directly contribute to enhancing public perceptions of media professionalism, credibility, and accountability.

On the other hand, research by the European Broadcasting Union[55] additionally warns that excessive transparency - particularly regarding technical explanation of how AI functions - can have a counterproductive effect, leading to confusion and reducing audience trust. Therefore, it is recommended that emphasis be placed on highlighting human responsibility, editorial oversight, and final content verification, rather than on overly technical details.

Although some journalists in the country already use AI for technical tasks, such as automated report preparation, transcriptions, or summary creation, they openly acknowledge the absence of official documents or editorial guidelines that define the responsible and ethical use of AI in newsrooms.[56]

As confirmed by global analyses,[57] insufficient verification of content produced or supported by AI, combined with the potential bias of algorithms, creates conditions to the uncritical dissemination of information, which can have serious consequences for public discourse, media integrity, and public trust.

### *Systemic risks and destructive potential of AI*

Beyond technical and operational challenges, AI also poses significant systemic risks that may have long-term, difficult-to-measure, and often invisible consequences for both the media and society at large. As one of the interviewed experts pointed out, AI lacks an inherent moral compass or ethical framework enabling it to independently assess the truthfulness, context, or ethical implications of the content it generates

53 European Broadcasting Union, *Leading Newsrooms in the Age of Generative AI* (Geneva: European Broadcasting Union, 2025).

54 Euractiv, *Clear Policies for AI in Journalism, Imperative for Ethics*, October 2024.

55 European Broadcasting Union, *Leading Newsrooms in the Age of Generative AI* (Geneva: European Broadcasting Union, 2025).

56 Interview with a journalist from a national TV, conducted on 26.05.2025.

57 Damian Radcliffe, *Journalism in the AI Era: Opportunities and Challenges in the Global South and Emerging Economies* (London: Thomson Reuters Foundation, January 2025).

and disseminates. This absence creates a space for the automation and widespread distribution of propaganda and manipulative narratives, which can easily infiltrate public discourse - especially in societies with low levels of media literacy and high vulnerability to disinformation.[58]

Additionally, the application of AI can be misused as a tool for cyberbullying, digital stigmatisation, and the reinforcement of stereotypes, thereby increasing the risk of marginalisation, psychological harm, and social exclusion, particularly among young people and other vulnerable groups. As one expert metaphorically noted: *"If nuclear technology has the explosive potential to destroy, artificial intelligence has an implosive potential, similar to a virus that infiltrates the system and destroys it from within."*[59] This implosive nature of AI suggests that its harm can be silent, gradual, and profound, ultimately undermining public trust and eroding democratic values.

### *Inclusiveness and a participatory model as preconditions for responsible AI integration*

One of the fundamental principles for the successful, responsible, and ethical integration of AI in the media is the establishment of an inclusive and participatory decision-making model that actively involves all relevant stakeholders. Such a model not only enhances transparency but also fosters collective responsibility and promotes the development of shared standards for working with new technologies.

This participatory approach fosters the development of an internal culture of accountability and facilitates the formulation of policies aligned with editorial values and public expectations.[60] It serves as a counterbalance to centralised, technocratic models of governance, where decisions are made in isolation without adequate involvement of the professional and journalistic community.

The findings from the interviews conducted for this analysis further confirm the need for such a model. Almost all interviewees emphasise the necessity of actively involving diverse professional profiles - including journalists, editors, technologists, legal experts, and representatives of the public - in decision-making processes concerning AI integration. Currently, practice is dominated by an isolated and *ad hoc* approach, resulting in a lack of collective responsibility and increased scepticism among journalists toward the technology. Interviewees caution that without the active participation of all these groups, efforts to build ethical and responsible AI use risk remaining merely declarative, lacking a genuine and practical foundation.

It is particularly important to emphasise that the public should not be a passive recipient of information but rather an active partner and critical corrective force, contributing to the strengthening of democratic oversight and public trust. The Council of Media

58 Interview with Sead Dzigal, Communication Expert, conducted on 19.06.2025.

59 Ibid.

60 Beatriz Gutiérrez-Caneda, Carl-Gustav Lindén, and Jorge Vázquez-Herrero, "Ethics and Journalistic Challenges in the Age of Artificial Intelligence: Talking with Professionals and Experts," *Frontiers in Communication* 9 (2024): 1465178.

Ethics highlights[61] that involving all relevant stakeholders - journalists, editors, legal experts, technologists, and citizens - is an essential prerequisite for building long-term trust and preventing potential abuses. This stance aligns with the analysis by the National Union of Journalists (NUJ)[62] in the United Kingdom, which emphasises that a participatory model not only enables stronger control and oversight but also fosters a sense of shared ownership and greater preparedness to address potential crises arising from uncontrolled or ill-considered use of AI.

Additionally, other interviewed experts, including representatives of the professional media community and university professors, also emphasise the need for broader consultation and active involvement of civil society sector and the academic community in the policy-making process. Such an approach would enable a balanced, sustainable, and socially acceptable integration of AI in the media, aligned with the public interest and high professional standards.

### *Trust, credibility, and public perception: The pillars of AI legitimacy in the media*

Practice in the country's audiovisual sector indicates that the integration of AI is occurring without formalised transparency policies or established structures for informing the public. This issue is particularly significant given the historically eroded trust in the media, stemming from longstanding political influences, economic pressures, and low levels of ethical and professional practices. Insights from interviewed experts suggest that without open communication and genuine honesty toward the audience, commitments to ethical practice risk remaining merely declarative, thereby directly jeopardising the long-term credibility and legitimacy of the media.[63]

The lack of clear labelling of content created or supported by AI, coupled with the absence of explanations regarding editorial decisions and methodological approaches, creates a serious potential for misunderstandings, misperceptions, and confusion among the public. This void undermines the media's ability to build a stable, trustworthy, and sustainable relationship with its audience. Under such circumstances, the public is at greater risk of perceiving AI use as a tool for manipulation or as evidence of hidden editorial agendas, which further erodes trust and diminishes the legitimacy of media content.

Global analyses further indicate that the absence of transparent and readily accessible guidelines for AI use significantly increases public scepticism and undermines media credibility.[64] At the same time, today's audiences increasingly expect proactive and transparent communication from the media about when and how AI is used, accompanied by clear visual labelling and detailed explanations of the technology's

61 Interview with Biljana Spaseska Georgievska, Executive Director of CMEM, conducted on 25.06.2025.

62 National Union of Journalists (NUJ), *Artificial Intelligence: NUJ Ethics Guidelines for AI Use in Journalism*, 2024.

63 Interview with Dejan Georgievski, President of the Media Development Center, conducted on 16.06.2025

64 Rande Price, *Journalists Confront the Reality of Media Use of AI* (Digital Content Next, 2025).

impact on the final journalistic product.[65] This model of transparency is not only crucial for protecting the public interest but also represents a fundamental prerequisite for preserving and strengthening professional integrity and for the long-term restoration of trust in the media.

## 4.3 Actual application and editorial practices

Although the strategic and ethical dimensions of AI in the media remain at an early stage, field insights reveal that certain forms of AI are already in use within newsrooms, predominantly at an individual and experimental level. This application does not stem from systematically defined policies or editorial strategies but is largely driven by the personal initiative of individual journalists and technical teams. Consequently, AI use is highly heterogeneous and often unpredictable, exhibiting significant variations across newsrooms.

### *Technical and operational forms of application*

According to interviewees in this study, the predominant current use of AI is confined to technical and operational support. This includes preparing summaries, automated transcription of audio and video materials, analysing large data sets, generating graphics and visual elements, as well as suggesting headlines or captions. *"I use AI to create tables and summarise data more quickly, but always with additional manual checking because there are often errors"*[66], noted one interviewee. This perspective reflects journalists' caution and their awareness of the crucial role of final human verification.

Another interviewee explained that AI is currently used mainly for visual and production tasks, such as creating animations, virtual sets, or simulations of event attendance. While this significantly saves time and resources, final editorial control before publishing the content remains essential.

These experiences indicate that AI is still perceived primarily as a supportive technology rather than as an essential tool for producing core journalistic content or for enhancing audience interaction and tailoring newsrooms' responses to the specific needs of different audience segments. Although this cautious approach currently mitigates the immediate risk of disinformation, it also reveals a lack of preparedness for broader, strategic, and long-term integration of AI into editorial processes aimed at improving content quality and diversity.

Although most interviewees acknowledge the benefits of automation, such as time savings and quicker data analysis, they express concern about preserving quality, authenticity, and the creativity in journalistic work. Maintaining the human perspective and critical thinking is seen as a key challenge, especially in a society where trust in the media is already fragile.

65 Omdena, *The Ethical Role of AI in Media: Combating Misinformation*, 2023.

66 Interview with a journalist from a national TV, conducted on 27.05.2025.

Although this cautious approach mitigates immediate risks, interviewees stressed that the lack of unified policies, organised training, and coordinated strategies reduces the strategic value of AI and increases exposure to ethical and professional risks. Similarly, the report by the European Broadcasting Union highlights that without centralised protocols and internal coordination, newsrooms risk remaining trapped in a model of "spontaneous use" instead of progressing towards long-term, planned integration.

Compared to European media, where AI is increasingly integrated through centralised systems supported by clear protocols and continuous training, in North Macedonia the technology is still primarily perceived as an "auxiliary tool" rather than a strategic resource. Nevertheless, interviewees recognise that the current use can serve as an "entry point" towards more complex future applications, particularly in investigative journalism, trend analysis, and the development interactive multimedia formats. However, without well-defined internal policies, professional training, and robust editorial oversight mechanisms, the risk of unethical or inappropriate use remains significant.

### *Personal initiative and responsibility*

The absence of formalised editorial policies and protocols places the entire responsibility for the proper and ethical use of AI onto individual journalists. This approach fosters uneven practices and varying interpretations of the line between technical support and core content production. As interviewees in this analysis noted, AI is frequently used for research or to quickly gather insights on topics, but *"never for fully writing articles, because the audience senses authenticity, and that is very important"*[67]. This view not only highlights the necessity of maintaining human intervention and critical analysis but also reveals a systemic weakness in newsrooms when it comes to collective coordination and oversight.

Moreover, many newsrooms face cultural barriers and resistance to AI, particularly among more experienced journalists who tend to be more sceptical of technological innovations. This attitude leads to a sense of stigma among younger journalists who, despite using AI as a support tool, are often perceived as "less capable" or "over-reliant on technology." Such dynamics further complicates efforts to establish a collective strategy and shared standards for AI use.

One of the key risks arising from this individualised approach concerns issues of copyright and content integrity. As experts note, *"it is not ethical if someone uses an AI application to rework a text or photo and then signs it as their own"*[68]. Such a practice not only constitutes a serious breach of ethical standards but also directly infringes both moral and material copyright, exposing newsrooms to potential legal consequences and lawsuits for intellectual property violations.

The lack of unified protocols increases reliance on individual decisions, leaving journalists to navigate complex ethical dilemmas independently and to assess the responsibility and impact of their work on a daily basis. According to findings from

67 Interview with a journalist from a national TV, conducted on 30.05.2025.

68 Interview with Dragan Sekulovski, Executive Director of AJM, conducted on 13.06.2025.

the global study by the Thomson Reuters Foundation,[69] as many as 79% of journalists work without formal AI usage policies, and only 13% follow official editorial guidelines. Although this situation is not unique to North Macedonia, it clearly signals the urgent need to formalise internal policies and protocols governing the use of AI.

Global guidelines, including the recommendations of the Council of Europe, consistently emphasise the need to establish clear frameworks for accountability, to appoint designated individuals or teams responsible for oversight, and to develop effective monitoring mechanisms. Such measures not only reduce reliance on personal judgment but also facilitate more efficient tracking of the implementation and impact of AI on journalistic practice.

Finally, the absence of structured policies and collective oversight not only places the psychological and professional burden on individual journalists, but also undermines a culture of shared responsibility, reduces organisational support, and weakens the capacity of newsrooms to safeguard the public interest and foster public trust.

### *Barrier: Limited resources and technical support*

As interviewees point out, limited financial and technical resources represent one of the most significant barriers to the broader, strategic, and responsible integration of AI in newsrooms. The lack of staff with specialised expertise, absence of technical support, and underdeveloped infrastructure severely restricts newsrooms' capacity to use AI in a more comprehensive and integrated way.

One of the interviewees emphasises that *"there is a serious problem with the lack of staff who can understand and properly use AI. Most journalists do not have technical support, so they have to experiment on their own,"*[70] which increases the risk of improvisation and unintended consequences. This situation further undermines newsrooms' ability to maintain high standards of accuracy and ethics.

Additionally, expert insights indicate that many newsrooms face limited opportunities to develop their own tools or implement complex technological solutions.[71] This lack reduces the autonomy of newsrooms and increases their dependence on commercial tools, which are not always adapted to the local context and may conflict with ethical standards and professional practices.

In addition to technical limitations, there is a serious lack of continuous training and formal professional development programs. As one interviewee emphasised, *"with AI, it's not enough to know how to activate the tool. You need to understand the ethical and professional standards behind it."*[72] This perspective underscores the need for a deeper understanding of the ethical, legal, and editorial implications of using AI. Additionally, several interviewees pointed out that every newsroom should have at

69 Damian Radcliffe, *Journalism in the AI Era: Opportunities and Challenges in the Global South and Emerging Economies* (London: Thomson Reuters Foundation, January 2025).

70 Interview with Dejan Georgievski, President of the Media Development Center, conducted on 16.06.2025.

71 Ibid.

72 Interview with Sead Dzigal, Communication Expert, conducted on 19.06.2025.

least one knowledgeable AI specialist who can oversee and coordinate the use of the technology. This highlights the importance of systematic capacity-building and the active involvement of various staff profiles - technical, editorial, and legal - in the AI integration process.

As previously emphasised, the lack of specialised training and internal programs undermines collective responsibility and places the burden of decision-making on individual journalists, thereby increasing stress and the risk of ethical lapses and professional errors. This challenge further highlights the need for strategic investment in human resources, the development of structures for continuous education, and the establishment of clear and predictable policies to support the use of AI.

### *The need to develop formal policies and internal protocols*

In a context where AI is increasingly integrated into media processes, the absence of formal policies and internal protocols creates a serious institutional and professional vacuum. As interviewees point out, *"this vacuum leaves AI in a 'grey zone,' where individual responsibility becomes the only mechanism for oversight and control, which further increases the vulnerability of newsrooms."*[73] The lack of formalised frameworks reduces the capacity for systematic risk management and exposes the media sector to significant ethical and professional compromises. The absence of unified policies and protocols not only undermines the culture of collective responsibility but also increases the professional burden on journalists, who are left to navigate complex technological and ethical dilemmas on their own.

In comparison with many international media outlets, where AI is already integrated on the basis of clearly defined policies and protocols, newsrooms in the country remain significantly behind. In many European and American media organisations, binding protocols have been introduced, including precise guidelines for labelling AI-generated or AI-supported content, detailed definitions of areas where AI use is permitted or strictly limited, and the establishment of dedicated roles or teams responsible for monitoring and continuously evaluating AI's impact on editorial processes.[74] Such systems support the consistent application of ethical standards, reduce the risk of manipulation, and help strengthen public trust in the media.

Global experiences, including analyses by Digital Content Next,[75] confirm that the lack of unified protocols at the international level undermines public trust and creates opportunities for abuse and manipulation. In the Macedonian context, as interviewees confirm, such mechanisms remain confined to public debate and individual initiatives, lacking systematic and unified editorial standards. The absence of collectively agreed rules hinders the development of a culture of accountability and increases the vulnerability of media outlets to political, economic, and technological influences.

73 Interview with Biljana Petkovska, Director of MIM, conducted on 14.06.2025.

74 Kim Björn Becker, Felix M. Simon, and Christopher Crum, "Policies in Parallel? A Comparative Study of Journalistic AI Policies in 52 Global News Organisations." *Digital Journalism*, 2024, 1–21.

75 Rande Price, *Journalists Confront the Reality of Media Use of AI* (Digital Content Next, 2025).

In such circumstances, the development of formalised policies and internal protocols emerges as a key prerequisite for the long-term preservation of professional integrity, the building of public trust, and the protection of the public interest. A good example of this approach is the BBC,[76] which in its principles for AI use, establishes clear standards for the fair, trustworthy, and responsible application of the technology, with a strong focus on transparency, privacy protection, continuous human oversight, and clearly defined accountability.

Therefore, the adaptation and integration of good global practices emerge as essential prerequisites for the long-term strengthening of professional credibility, the protection of the public interest, and the advancement of media resilience in the digital era.

76 BBC. *BBC AI Principles*. February 2024.

# 5. Concluding observations and recommendations

## 5.1 Alignment with the legal instruments of the Council of Europe and the EU

As a member state of the Council of Europe, the Republic of North Macedonia has committed to implementing all legal instruments adopted by its bodies and institutions. One of the key documents in this domain is the Council of Europe's *Framework Convention on Artificial Intelligence*, which serves as a legally binding instrument designed to ensure that AI systems comply with human rights, democratic principles, and the rule of law.

The Convention was opened for signature in September 2024, and by the end of June 2025, among the Balkan countries, only Montenegro had signed it. Given the importance of this document for regulating the transformative role of AI in democratic society, as well as North Macedonia's strategic commitment to adhering to the priorities and objectives of the Council of Europe, it is essential that the competent institutions initiate the procedure for signing and ratifying the Convention.

Furthermore, signing the Convention is especially significant in the context of the European Union integration process, as this document is fully compatible with the *EU Artificial Intelligence Act*. The Ministry of Digital Transformation should consider the importance of these two legal instruments when initiating the announced process of media reforms, within which harmonisation of domesticlegislation with the EU regulatory package is envisaged, particularly with the *Digital Services Act* and the *European Media Freedom Act*.

In addition to these strategic steps towards legal harmonisation, there is also scope for immediate actions at the domestic level. Regardless of the formal process of accession to and alignment with the legal instruments of the Council of Europe and the EU, the competent institutions and stakeholders in the media sector can immediately initiate activities to implementing the *Guidelines on the responsible implementation of AI systems in journalism*. Specifically, it is recommended that:

- The Ministry of Digital Transformation, as part of the media legislation revision process, should organise an expert debate on establishing a financial support program for projects that promote the responsible use of AI, aimed at enhancing the content quality and diversity, particularly among small and local media;
- The Agency for Audio and Audiovisual Media Services, with the support of experts, should develop detailed guidelines and standards for the application and responsible use of AI systems in audiovisual media, drawing on experiences from countries with more advanced AI adoption;

- The Program Council of the Public Broadcasting Service should, following the example of public broadcasters elsewhere, draft a dedicated document — Standards and guidelines for the use of AI in service of the mission of the public service — and initiate the development of a new Strategy for the development of MRT, including a special section focusing on the integration of AI systems within the journalistic production process;
- The Council of Media Ethics and its Press Complaints Commission should, in monitoring the application of ethical standards in journalistic content, initiate research and other activities to better understand public perceptions of the use of AI in journalism;
- Media outlets, journalists, civil society organisations, researchers, and other relevant stakeholders should join the existing initiative of the regulatory body to improve citizens' information and media literacy, including literacy regarding the use of AI systems.

## 5.2 Strategic framework and support for integrating AI in the audiovisual sector

The analysis of the state of AI application in the audiovisual sector in the Republic of North Macedonia clearly indicates that the integration of these technologies remains at an early and structurally underdeveloped stage. Currently, the use of AI is largely confined to technical and support tasks, often driven by individual initiatives rather than supported by systemic frameworks or unified editorial policies.

Although awareness of AI's potentials and risks is gradually growing, the absence of formal policies, structured oversight, and dedicated training programs leaves the technology in a so-called "grey zone," where personal initiative and individual responsibility are the sole mechanisms of control. This approach not only highlights the vulnerability of newsrooms but also undermines public credibility and trust in the media.

The lack of systematic risk assessment, transparency, and clear labelling of AI-generated content further hampers the media's capacity to safeguard the public interest. Despite encouraging steps - such as the revision of the Journalists' Code of Ethics and proactive efforts by the professional media community - practical implementation remains limited and fragmented.

Field observations confirm the dominant role of individual initiative and the absence of systematic protocols, indicating a broader organisational culture in which the traditions of classical journalism intersect with the complex challenges of digital transformation. In this context, AI acts as a "litmus test" for the maturity of professional standards and the media sector's capacity for self-regulation.

Therefore, the key to successful future integration of AI lies not only in technological implementation but also in fostering a culture of professional ethics, systemic

transparency, and public accountability. Achieving this requires overcoming isolation, building stable internal capacities, and establishing structures that ensure the safe and responsible use of technology. Therefore, the key to successful future integration of AI lies not only in technological implementation but also in fostering a culture of professional ethics, systemic transparency, and public accountability. Achieving this requires overcoming isolation, building stable internal capacities, and establishing robust structures that ensure the safe and responsible use of technology.

It is essential to establish comprehensive internal policies, continuous training programs, and effective mechanisms for transparency. Particularly important is the adoption of an inclusive and participatory decision-making model that actively integrates all relevant stakeholders. According to recommendations from the Thomson Reuters Foundation (2025), such a multi-sectoral approach — bringing together media professionals, technologists, regulators, civil society organisations, and academic institutions — is crucial for shared ethical standards and legal frameworks that ensure the responsible use of AI.

This model is especially important for countries with weaker institutional infrastructure, such as North Macedonia, as it helps overcome limitations in resources and expertise while simultaneously strengthening public trust.

Thus, AI should not be seen merely as a tool for enhancing efficiency, but also as an opportunity for journalism to reaffirm its role as a guardian of the public interest and a fundamental pillar of democracy in the digital era.

## 5.3 Updating the Code of Journalists

Updating the Journalists' Code of Ethics emerges is a key commitment for safeguarding the public interest, maintaining credibility, and reinforcing professional integrity in the era of digital transformation and the growing use of AI. Although the media community has already begun revising the Code, the findings of this analysis, alongside global trends, indicate the need for a more thorough and systematic integration of AI-related ethical considerations as a distinct and priority issue.

The recommendations for modernising the Code include:

- *Inclusion of the principle of human oversight and ultimate editorial responsibility.* The Code should explicitly affirm that journalists and editors retain ultimate responsibility for content created or supported by AI. This principle is essential for preserving authenticity and preventing automation without human supervision. As stated in the *Paris Charter on AI and Journalism*,[77] the human dimension must be at the centre of all editorial decisions and strategies.
- *Obligation for transparent labelling of AI-generated content.* All content created using AI must be clearly labelled, in accordance with global best prac-

77 Reporters sans Frontières. *Paris Charter on AI and Journalism*.

tices, including the recommendations of IMPRESS[78] and the *Paris Charter*[79]. These documents stipulate that any use of AI significant impacting the production or distribution of journalistic content must be clearly disclosed and communicated to audiences. This aligns with the BBC AI Principles,[80] which emphasise transparency towards users, human oversight over automated processes, and clear editorial accountability for AI-generated material. Additionally, media outlets should maintain a publicly accessible register of all AI systems employed, detailing their purposes, scope, and conditions of use.

- *Measures to minimise algorithmic bias and protect pluralism.* The Code should include provisions for actively managing algorithmic bias and supporting the pluralism of viewpoints and sources. AI technologies risk reinforcing discrimination, bias, and harmful stereotypes, as well as creating "information bubbles" that limit the free flow of information.[81]
- *Continuous professional education on AI.* The Code should mandate ongoing training covering the technical, ethical, and legal aspects of AI. Insights from interviewed journalists and experts indicate that without continuous education, the risk of uncritical and mechanical application of AI significantly, potentially leading to ethical breaches and professional failures.
- *Public accountability and transparency of policies.* The Code should require the public disclosure of internal AI policies and procedures. It is recommended that media organisations maintain dedicated webpages detailing the objectives, limitations, and methods of AI implementation. This transparency would enable citizens and civil society organisations to monitor media practices and engage actively in democratic oversight.

## 5.4 Internal acts for transparent and ethical application of AI

In addition to revising the Journalists' Code of Ethics, it is equally important to develop detailed internal regulations and protocols that will serve as practical tools to ensure the responsible, transparent, and ethical use of AI within newsrooms. These documents should be carefully tailored to the specific needs of each newsroom and regularly reviewed and updated to keep pace with rapid technological advancement and emerging ethical challenges.

78 Impress, *Best Practice Note: The Use of Artificial Intelligence*, April 2025.

79 Reporters sans Frontières. *Paris Charter on AI and Journalism*.

80 BBC. *BBC AI Principles*. February 2024.

81 Council of Media Ethics of Macedonia. *Regional Declaration: AI as an Assistant, Never as Replacement for Human Judgement*. 2025.

The recommended guidelines include:

- *Defining clear rules for AI use.* It is essential to specify precisely where, how, and under what conditions AI can be employed, clearly distinguishing between technical support roles and the creative and editorial responsibilities of journalists. This helps mitigate the risk of uncontrolled automation and ensures that human critical judgment remains a central safeguard.
- *Appointing a responsible person or AI team*. Establishing a formal structure accountable for monitoring, implementing, and continuously adapting AI policies is necessary. This strengthens systematic oversight and reduces the risk of arbitrary or inappropriate interventions.
- *Ensuring transparency and public accountability.* This entails creating internal registers for AI applications, preparing and publishing annual reports on the impact of AI on journalistic practices, and maintaining ongoing communication with the public. Such transparency is crucial for building trust and safeguarding the media outlet's credibility.
- *Introducing protocols for rapid response and correction.* Mechanisms should be implemented to enable timely intervention and rectification of errors or inaccuracies caused by AI, thereby minimising negative consequences for both the public and the newsroom's reputation.
- *Maintaining dynamism through regular updates.* Internal policies should be considered "living documents," adaptable and accessible to all newsroom members. Regular internal and external reviews are necessary to ensure their effectiveness, sustainability, and the preservation public trust.

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*The action "Protection of Freedom of Expression and Freedom of the Media in North Macedonia (PRO-FREX)", implemented under the Horizontal Facility III, enables beneficiary institutions and civil society organizations to fulfill their reform agendas in the area of freedom of expression and freedom of the media, in line with European standards. It aims to strengthen the implementation of the right to freedom of expression, in particular for journalists and media actors, in a more pluralistic and safer media environment, aligned with the standards of Article 10 of the European Convention on Human Rights.*

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