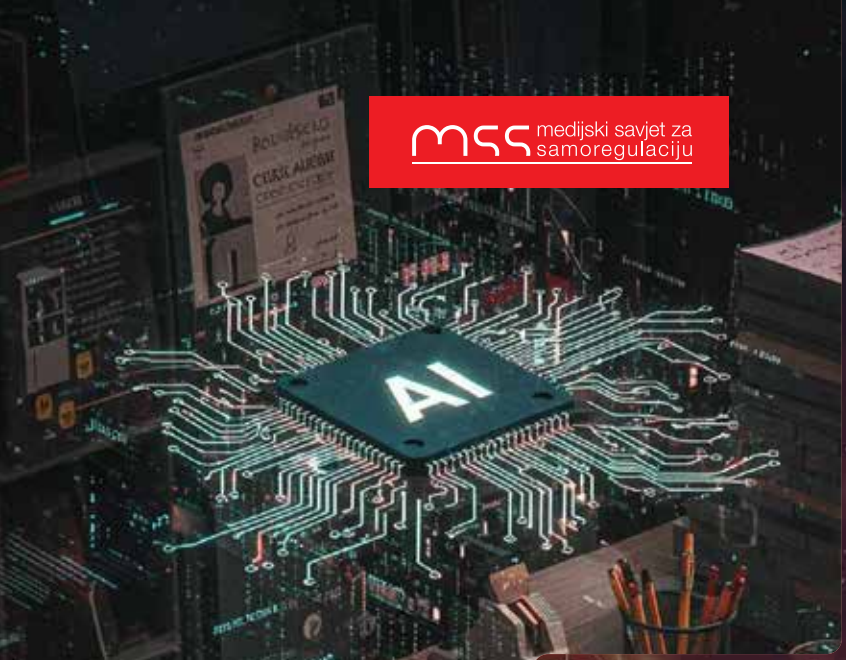

medijski savjet za samoregulaciju

ADVANTAGES AND RISKS OF USING AI IN THE MEDIA SECTOR

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I. INTRODUCTION

Ethical principles and guidelines for new methods and areas of activity are often shaped where boundaries are crossed, where transgressions occur in the exploration of uncharted *terrae incognitae*. It is precisely at these points of "rupture" and deviation from general principles, through their poor, inadequate, or incomplete application, that new norms emerge, tailored to the new context. In this case, these are the norms that should guide all who follow in the footsteps of the so-called great pioneers, those who were the first to explore, often in misguided ways, how and to what extent artificial intelligence (AI) can be used, and how to keep that powerful tool under control in our still insufficiently capable hands.

The pioneers in question are now globally recognized for their controversial experimentation with the use of AI in journalism. They conducted fictional, AI-generated interviews, for instance, with a late author who won a Nobel Prize in Literature[1] or a permanently incapacitated Formula 1 champion[2], fired news anchors to replace them with avatars[3], produced a large number of specialized articles at remarkable speed without referencing authors (even though they were AI-generated[4]), published editorials supposedly written by AI but later "edited" by humans,[5] and so on.

However, even greater concern surrounds the growing use of AI to create sophisticated deepfake content nowadays. A fabricated interview with Michael Schumacher likely caused deep distress to his family[6] and sparked public outrage over the apparent lack of consent from the legendary champion and the commercialization of his condition. A conversation with Szymborska, twelve years after her death, provoked angry reactions from the public, who viewed the AI-generated answers and voice cloning as a desecration of the poet's legacy. And yet, the public was not under the illusion that these voices, belonging to the deceased who can no longer speak, were truly authentic.

A particular threat, one that demands a corresponding level of caution, is now posed by AI-generated interviews and videos featuring active public figures, most often politicians, which can directly influence their approval ratings or the outcome of elections. Such content not only undermines the legitimacy of democratic processes but also erodes public trust in the media and their role in contemporary society.

1 More information available at: *https://www.polskieradio.pl/395/7791/artykul/3439588,interview-with-a-polish-nobel-laureate-raises-controversy-ai-takes-over-journalism; https://www.nytimes.com/2024/11/03/world/europe/poland-radio-station-ai.html.*

2 More information available at: *https://www.independent.co.uk/f1/michael-schumacher-family-sues-interview-now-b2323213.html.*

3 More information available at: *https://www.lemonde.fr/economie/article/2024/11/03/en-pologne-l-intelligence-artificielle-dans-une-radio-tourne-au-fiasco_6374002_3234.html?utm_source=chatgpt.com.*

4 More information available at: *https://www.wired.com/story/cnet-published-ai-generated-stories-then-its-staff-pushed-back/?utm_source=chatgpt.com;https://www.theverge.com/2023/1/25/23571082/cnet-ai-written-stories-errors-corrections-red-ventures?utm_source=chatgpt.com.*

5 More information available at: *https://www.theguardian.com/commentisfree/2020/sep/08/robot-wrote-this-article-gpt-3* (editorial note at the end of the editorial requires particular attention).

6 The family sued the media outlet that published the "interview" and won the case, receiving compensation of €200,000. More information available at: *https://www.theguardian.com/sport/article/2024/may/23/michael-schumacher-family-win-legal-case-against-publisher-over-fake-ai-interview.*

The new era and emerging technologies have imposed on journalism and the media an arguably unexpected task – to reconsider and redefine their own role by seeking answers to some essential questions. For example: What does it mean to be a journalist today? What is journalism, and what are the media? Can the media even survive in their old form and under their old name in a new, digital environment largely shaped by AI? Can, and will, AI truly replace journalists, translators, designers, and teachers? The answer to these questions depends on how we define the meaning and purpose of these professions.

If we define the mission of journalism as ensuring every citizen's right to access high-quality and accurate information that enables us, both as individuals and as a society, to stay informed and make meaningful decisions and if we see the media as reliable intermediaries in that process, then it becomes clear that they cannot be replaced by a tool, which is what AI essentially is. A similar understanding of journalism's mission and the ethical use of AI is articulated in the *Paris Charter on AI and Journalism*, the first international ethical standard addressing AI in journalism[7]. The Charter was initiated by Reporters Without Borders (RSF) and developed by a commission chaired by journalist and Nobel Peace Prize laureate Maria Ressa. The document outlines ten key principles for safeguarding the integrity of information and the social role of journalism. These include: that journalists should be guided by ethics in their use of technology and in managing technological choices within newsrooms; that the central role of human agency in editorial processes must be preserved; that media organizations must clearly distinguish between authentic and synthetic content; and that they should actively participate in global AI governance and defend the sustainability of journalism in negotiations with tech companies[8].

Hanna Mollers, the representative of the European Federation of Journalists (EFJ) in the commission that drafted the Charter, says:

> "At the end of the day, AI is nothing more than a tool. Whether a knife is used for cooking or for killing depends on how we use it. We don't ban knives, we criminalize murder. AI should not be banned, but it must be regulated so that we can develop a constructive approach to AI that promotes democracy and journalism. That's why we need guidelines (...)."[9]

In the spirit of these words, the primary purpose of the handbook before you is not only to provide a media regulatory and self-regulatory contextualization of AI, but also to formulate guidelines that can help the Montenegrin media community address the dilemmas that arise in daily work. We developed these guidelines based on conversations with national, regional, and international experts in media and latest technologies, with the aim of assisting Montenegrin journalists in handling this promising, threatening, useful, yet hallucination-[10] and bias-prone tool – artificial intelligence.

7 Available at: https://rsf.org/sites/default/files/medias/file/2023/11/Paris%20Charter%20on%20AI%20and%20Journalism.pdf.
8 More information available at: https://rsf.org/en/rsf-and-16-partners-unveil-paris-charter-ai-and-journalism.
9 More information available at: https://www.snh.hr/pariska-povelja-o-umjetnoj-inteligenciji-i-novinarstvu/.
10 Some theorists consider the use of the term "hallucination" problematic, as hallucinations involve a perceptual experience, an impression occurring without corresponding objective sensory stimulation, which is not the case with errors made, for example, by ChatGPT. Critics argue that using this term psychologizes and anthropomorphizes AI, and instead suggest the term 'confabulation'. Compare: T.

II. EUROPEAN REGULATIONS, AI AND THE MEDIA

II.1. Regulatory framework of the European Union

The emergence and application of AI in the internal market of the European Union has been accompanied by a series of regulatory initiatives of varying scope, significance, and reach, aimed at ensuring the ethical and responsible use of this technology.

The European Union has undertaken a pioneering legislative effort at the global level in the field of AI – the Artificial Intelligence Act[11] (hereinafter referred to as AI Act) is the first regulatory initiative aimed at establishing and regulating the governance of this technology.

The adoption of the AI Act raised questions about its implications for the media ecosystem, particularly regarding the risks that the use of AI poses to journalistic practice, copyright, and the rights of media content users.[12]

The adoption of the AI Act was preceded by several regulatory initiatives. Among the most important is the *Coordinated Plan on Artificial Intelligence*, presented within the *Communication from the European Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee, and the Committee of the Regions* of 2018 (COM (2018) 795).[13] The Commission proposed working with Member States on a coordinated AI plan by the end of 2018, with the aim of maximizing the impact of investments at both the EU and national levels, encouraging synergy and cooperation across the Union, exchanging best practices, and jointly defining the development goals, to ensure that the EU as a whole remains competitive globally. The proposed coordinated plan is based on the *Declaration of cooperation on Artificial Intelligence*[14], adopted on Digital Day 2018 (10 April). The Declaration was signed by all EU Member States and Norway.

Stening, "What are AI chatbots actually doing when they 'hallucinate'? Here's why experts don't like the term" (*https://news.northeastern.edu/2023/11/10/ai-chatbot-hallucinations/*); B. Edwards, "Why Chat GPT and Bing Chat are so good at making things up" (*https://arstechnica.com/information-technology/2023/04/why-ai-chatbots-are-the-ultimate-bs-machines-and-how-people-hope-to-fix-them/*); T. Z. Ramsøy, "The Misunderstood Musings of AI: Confabulation, Not Hallucination" (*https://thomasramsoy.com/index.php/2024/03/12/the-misunderstood-musings-of-ai-confabulation-not-hallucination/*).

11 Regulation (EU) 2024/1689 of the European Parliament and the Council of 13 June 2024 laying down harmonized rules on artificial intelligence and amending Regulations (EC) br. 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). More information available at: *Regulation - EU - 2024/1689 - EN - EUR-Lex*.

12 More information available at: *The EU AI Act and its implications for the media sector | AlgoSoc.*

13 Coordinated Plan on Artificial Intelligence, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, 7.12.2018; COM (2018) 795. Available at: *EUR-Lex - 52018DC0795 - EN - EUR-Lex.*

14 Available at: *https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52018DC0795*. Also relevant is the Report with Recommendations to the Commission on Civil Law Rules on Robotics (2015/2103 (INL)), which reflects the growing need for a clearly defined legal framework that will address new technological challenges: *REPORT with Recommendations to the Commission on Civil Law Rules on Robotics | A8-0005/2017 | European Parliament*, 27.1.2017.

The Ethics Guidelines for Trustworthy Artificial Intelligence of 2018 [15] (hereinafter: Ethics Guidelines) start from the premise that AI systems are tools that can enhance individual and collective well-being. They highlight four ethical principles, based on fundamental rights, which must be observed to ensure that AI systems are developed, deployed, and used in a trustworthy manner. These are[16]: (i) respect for human autonomy,[17] (ii) prevention of harm,[18] (iii) fairness,[19] and (iv) explicability[20]. These principles are defined as ethical imperatives that AI experts should always keep in mind and adhere to. They are listed here in the order in which they appear in the Treaty on the European Union, without implying any hierarchy of importance.

The Ethics Guidelines highlight the need for special attention to vulnerable groups, such as children, persons with disabilities, and other groups that have historically been disadvantaged or are at risk of exclusion. Additionally, they highlight the importance of ethical conduct in situations characterized by an imbalance of power or information – for example, between employers and employees, businesses and consumers, or the media and media content users.

The document *Building Trust in Human-Centric Artificial Intelligence*, COM (2019) 168,[21] emphasizes the need to develop AI that serves humanity.

The *White Paper on Artificial Intelligence – A European Approach to Excellence and Trust*[22] of 2020 states that the EU's existing legislation must be gradually adapted to the development of new technologies through three initiatives: (1) the adoption of a new, coherent legal framework for AI, (2) the regulation of liability issues related to the use of new AI-based technologies, and (3) the revision of safety legislation.[23]

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15 Available at: https://digital-strategy.ec.europa.eu/en/library/ethics-guidelines-trustworthy-ai.

16 See Recital 48 of Ethics Guidelines for Trustworthy Artificial Intelligence: https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/JURI/DV/2019/11-06/Ethics-guidelines-AI_HR.pdf.

17 According to Recital 50, the fundamental rights upon which the EU is founded are directed towards ensuring respect for the freedom and autonomy of human beings. Humans interacting with AI systems must be able to keep full and effective self-determination over themselves, and be able to partake in the democratic process.

18 According to Recital 51, AI systems should cause no harm or otherwise adversely affect human beings. This entails the protection of human dignity as well as mental and physical integrity. AI systems and the environments in which they operate must be safe and secure. They must be technically robust and it should be ensured that they are not open to malicious use.

19 According to Recital 52, the development, deployment and use of AI systems must be fair. While we acknowledge that there are many different interpretations of fairness, we believe that fairness has both a substantive and a procedural dimension. The substantive dimension implies a commitment to: ensuring equal and just distribution of both benefits and costs, and ensuring that individuals and groups are free from unfair bias, discrimination and stigmatisation. If unfair biases can be avoided, AI systems could even increase societal fairness. Equal opportunity in terms of access to education, goods, services and technology should also be fostered.

20 According to Recital 53, explicability is crucial for building and maintaining users' trust in AI systems. This means that processes need to be transparent, the capabilities and purpose of AI systems openly communicated, and decisions – to the extent possible – explainable to those directly and indirectly affected.

21 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Building Trust in Human-Centric Artificial Intelligence, Brussels, 8.4.2019, COM (2019) 168. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52019DC0168.

22 White Paper on Artificial Intelligence – A European approach to excellence and trust, European Commission, 19 February 2020. Available at: https://commission.europa.eu/document/download/d2ec4039-c5be-423a-81ef-b9e44e79825b_en?filename=commission-white-paper-artificial-intelligence-feb2020_en.pdf.

23 D. Prlja, G. Gasmi, V. Korać, Artificial Intelligence in the EU Legal System, Institute for Comparative Law, Belgrade 2021, page 107. Vidjeti i: S. Grbović, J. Đurišić, "AI Act – Striking a delicate balance between regulation and innovation", Proceedings Book with Peer Review on Scholarly Papers, Zagreb, 2022.

Fostering a European Approach to Artificial Intelligence, COM (2021) 205[24] is a document calling for the development of systems that ensure greater safety, efficiency, and innovation in the field of AI. Also important for the further application of AI is the Consumer Protection Directive (EU 2020/1828),[25] which provides additional safeguards for the rights of users of digital products and services, including those based on AI. In addition, the Resolution of the European Parliament of 20 October 2020 (2020/2014(INL)) offers recommendations to the Commission on establishing a civil liability regime for AI.[26]

The Digital Services Act (DSA)[27] and the Digital Markets Act (DMA)[28], adopted in 2020, offer key regulatory frameworks for digital services and markets, with a particular focus on platforms that use AI to manage user data and market practices. The DSA introduces transparency requirements regarding algorithmic recommendation systems used by platforms to distribute content – which may have direct implications for media freedom, as such mechanisms can potentially shape public opinion and access to information. The DMA, on the other hand, focuses on curbing monopolistic practices of major digital platforms, such as Google and Facebook, and addresses the issue of fair market conditions, thereby promoting the ethical use of AI in the digital environment.

The General Data Protection Regulation (GDPR) remains relevant in the context of AI, as it regulates the processing of personal data through automated systems, including those based on AI. This means that data processing through AI must also comply with the principles of lawfulness, transparency, and accuracy. It must observe the prohibition of discrimination, consumer protection, judicial cooperation in criminal matters, and other related standards.[29]

The adoption of the AI Act in 2024 marks the most important step toward regulating AI within the European Union, as it offers a comprehensive framework for the ethical and responsible use of AI technologies across the EU.

Finally, the *Regulation of the European Parliament and of the Council on establishing a common framework for media services in the internal market and amending Directive 2010/13/EU* (*European Media Freedom Act – EMFA*)[30] was recently adopted. Article 18 of this regulation stipulates that very large online platforms (so-called *VLOPs*) must ensure a systemic functionality that prevents media service providers from distributing AI-generated content without editorial control and human oversight.

24 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Fostering a European approach to Artificial Intelligence, Brussels, 21.4.2021, COM (2021) 205 final. Available at: *COM_COM(2021)0205_EN.pdf.*

25 Available at: *Direktiva - 2020/1828 - EN - EUR-Lex.*

26 European Parliament resolution of 20 October 2020 with recommendations to the Commission on a civil liability regime for artificial intelligence (2020/2014(INL)). Available at: *EUR-Lex - 52020IP0276 - EN - EUR-Lex.*

27 Available at: *Digital Services Act | EUR-Lex.*

28 Available at: *Digital Markets Act | EUR-Lex.*

29 D. Prlja, G. Gasmi, V. Korać, *ibid*, page 107. Also see: S. Grbović, J. Đurišić, *op.cit. page 7* More information available at: 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) (Text with EEA relevance). Available at: *https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng*.

30 Available at: *Regulation - EU - 2024/1083 - EN - EUR-Lex.*

II.1.1. Analysis of relevant aspects for the AI Act

The AI Act provides a framework for managing risks associated with AI technologies. These risks are divided into four categories: unacceptable, high, limited, and low. This classification is important because different control measures apply depending on the risk category – stricter control measures are foreseen for AI systems classified as high-risk.[31]

AI systems that fall under the category of unacceptable risk are those that are in direct contradiction with fundamental European values and human rights, and as such, their use is prohibited on the EU market. Additionally, the manipulation of people and certain vulnerable groups is also banned. For example, "systems that apply subliminal techniques capable of causing significant unconscious changes in a person's behaviour in a way that causes, or could cause, physical or psychological harm to that person or another person".[32]

High-risk AI systems are primarily defined by their potential negative impact on individuals' health and safety. As a result, these systems are subject to strict checks and conformity assessments, including mandatory registration with the European Commission before entering the EU market, to ensure continuous monitoring. This category includes: AI systems for biometric identification and categorization of individuals; systems used for dispatching and prioritizing emergency services (medical aid, fire services, police); AI systems involved in public infrastructure necessary for the supply of gas, water, and electricity; AI systems used for access to education; systems for assessing individual capabilities during recruitment; AI systems used by the police for the enforcement of rights in the fields of asylum, migration, and border control; as well as AI systems used within the judiciary for managing risk, data, records, transparency, human oversight, resilience, and cybersecurity.[33]

AI systems of limited (low) risk do not pose a serious threat to human health and safety but do carry a risk of manipulation. These are systems that interact with people, recognize their emotions and group affiliations, generate or manipulate content, etc. Although, due to their nature, they are not subject to complex control procedures like high-risk systems, they are still required to meet certain transparency criteria toward users in order to access the EU market.[34]

Artificial intelligence systems used for games, spam filters, and similar purposes fall under the category of low-risk systems, and are therefore exempt from the requirements set out in the AI Act.[35]

The AI Act clearly identifies high-risk AI systems, including those used for creating and distributing content on digital platforms, facial recognition algorithms, and systems for automatically generating media content. Systems that can have a significant impact on human rights and freedoms are also classified as high-risk. For example, content recommendation algorithms on social media can

31 S. Grbović, J. Đurišić, *op.cit.*, page 5.
32 Article 5 of the AI Act. Also see: S. Grbović, J. Đurišić, *ibid*, Zagreb, 2024, page 6.
33 Articles 9–15 of the AI Act. See: D. Prlja, G. Gasmi, V. Korać, *ibid*, page 120; S. Grbović, J. Đurišić, *ibid*, Zagreb, 2022.
34 Article 52 of the AI Act.
35 Article 69 of the AI Act.

strongly influence public opinion and freedom of expression. According to Article 6 of the AI Act, in cases where AI is used for automated decision-making or content recognition, additional protective measures must be introduced to reduce the risk of manipulation and disinformation.

II.1.2. Analysis of the AI Act in the media context

The AI Act, adopted in 2024, marks a key regulatory framework for the development and use of AI within the European Union. It defines different levels of risk associated with AI applications (unacceptable, high, limited, and low), with each level requiring different regulatory measures. The AI Act does not focus directly on the media, nor are media or media content providers explicitly mentioned in its text, either in the recitals or in the normative provisions. However, there are aspects of the Act that are relevant to the media sector. These particularly relate to content production, news distribution, the spread of disinformation, algorithmic transparency, accountability for disinformation, ethical use of technology, and the protection of users' rights. In this context, it is clear that the AI Act has a significant impact on media freedom, as it regulates risks related to discrimination, privacy violations, and unethical use of AI across different sectors, including the media.

The question of whether the use of AI in the media should be classified as high-risk, and thus subject to the strictest aspects of regulation, is tied to broader discussions about the impact of algorithm-driven platforms on fundamental rights, such as freedom of expression and the right to privacy. Recent scientific analyses show that access to media content through digital platforms is becoming essential for participation in modern society,[36] and an increasing number of scholars point to the risks of using AI in the media – such as the spread of disinformation, digital exclusion, foreign interference in democratic processes, and social polarization. The AI Act does not classify media content as high-risk,[37] but it is expected that certain aspects of AI use in the media will be classified as such in the future – especially since the criteria for identifying high-risk systems include potential negative impacts on fundamental rights, the relevance of the system for an inclusive society, and power imbalance between AI service providers and users.[38] The Draft Digital Services Act has already recognized that automated content moderation systems can pose systemic risks to fundamental rights, which justifies additional regulation, particularly in the case of very large online platforms.[39]

The use of AI in the media is an important topic, both from the perspective of users and technology developers. The AI Act provides a broad definition of AI, grouping different technologies according to the level of risk they pose (from low-risk to high-risk), which in turn determines the level of regulation applied to them.

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36 N. Helberger, N. Diakopoulos, *AI Act and How It Matters for Research into AI in Media and Journalism*. Available at: https://pure.uva.nl/ws/files/153196206/The_European_AI_Act_and_How_It_Matters_for_Research_into_AI_in_Media_and_Journalism.pdf, page 4.

37 More information available at: The EU AI Act and its implications for the media sector | AlgoSoc.

38 N. Helberger, N. Diakopoulos, *ibid*.

39 Napoli 2019, Appelman *et al*. 2019, Colomina *et al*. 2021, Balkin 2017, referenced in: N. Helberger, N. Diakopoulos, *ibid*.

Therefore, media organizations, as users of AI services, must act responsibly when selecting such technologies and be transparent in their use.[40] Even though the AI Act does not have specific provisions about the media, it has clear implications for the media sector – algorithmic recommendations, accountability for generated content, transparency, and privacy protection are all issues that also apply to media systems and practices.

Establishing guidelines for the development and use of AI systems will contribute to the protection of media freedom, pluralism, and fundamental human rights. Media outlets will be subject to regulatory requirements related to transparency and accountability, which are essential for upholding ethical standards and combating disinformation.

II.1.2.1. Transparency and accountability

The AI Act mandates transparency in the use of AI systems, which is highly relevant for the media. It also prescribes that users must be clearly informed about how AI contributes to shaping the content they are shown, including algorithmic recommendations on news platforms.[41] This means that media organizations should be obligated to inform users about how AI technologies function on their platforms, for example, when personalizing news or automatically generating articles. Such a responsible approach is crucial for preserving media freedom and pluralism, as transparency reduces the risks of abuse, hidden manipulation of information, and public opinion. Although media are not classified as high-risk, they are still required to comply with transparency obligations, particularly in terms of chatbot use, content moderation, and algorithmic recommendations.[42]

II.1.2.2. Algorithmic bias and ethical challenges

Algorithmic bias can lead to the selective presentation of news and the favouritism of certain sources. If content recommendation algorithms favour sources that are politically biased or spread disinformation, this seriously threatens media freedom and pluralism. Therefore, regulating AI bias is crucial for preserving media objectivity and protecting the interests of citizens.

II.1.2.3. Application control – jurisdiction and sanctions

The AI Act provides for supervision and quality controls over the use of AI, along with sanctions in cases of irregularities and violations of regulations.[43] To this end, the establishment of a European artificial intelligence committee and a European data protection supervisor is proposed,[44] and each Member State must appoint competent national authorities and a supervisory body to enforce the

40 The EU AI Act and its implications for the media sector | AlgoSoc.
41 *Ibidem.*
42 A. Schiffrin, AI and the future of journalism: an issue brief for stakeholders, UNESCO, 2024. Available at https://unesdoc.unesco.org/ark:/48223/pf0000391214.
43 Articles 56 and 57 of the AI Act.
44 Article 56 of the AI Act.

AI Act. Additionally, *ex post* market surveillance is envisaged to ensure that AI systems comply with the specific requirements set out in the Act.[45] Accordingly, media companies using AI to create and distribute content may be subject to inspections, ensuring accountability in the application of AI technologies, preventing violations of ethical standards and disinformation, and if irregularities are found, they may face sanctions such as fines or other regulatory measures.

II.1.2.4. Privacy protection and data protection

In addition to the *General Data Protection Regulation* (GDPR), privacy and data protection are also addressed by the AI Act,[46] particularly in the field of using AI for analyzing user data and generating personalized content. According to this law, media service providers must ensure that any algorithmic system used for collecting and analyzing user data complies with privacy and data protection principles. This prevents potential misuse of user data for manipulating information, which could seriously threaten freedom of expression and the right to be informed.

II.2. Regulatory framework of the Council of Europe

The Council of Europe has addressed artificial intelligence through a series of documents, primarily focusing on its impact on human rights. It is necessary to mention the Committee of Ministers' recommendations on promoting a favourable environment for quality journalism in the digital age (CM/Rec(2022)4)[47] and on the impact of algorithmic systems on human rights (CM/Rec(2020)1),[48] as well as the Committee of Ministers' *Declaration on the manipulative capacities of algorithmic processes.*[49]

The Council of Europe has addressed AI through a series of documents, primarily focusing on its impact on human rights. It is important to mention the Committee of Ministers' recommendations on promoting a favourable environment for quality journalism in the digital age (CM/Rec(2022)4) and on the human rights impacts of algorithmic systems (CM/Rec(2020)1), as well as *the Committee of Ministers' Declaration on the Manipulative Capabilities of Algorithmic Processes*. The most significant document is undoubtedly the *Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy, and the Rule of Law* (CAI).[50] Also very important are the *Guidelines on the Responsible Implementation of Artificial Intelligence Systems in Journalism*,[51] adopted by the Steering Committee on Media and Information Society (CDMSI) of the Council of Europe.

45 Article 61 of the AI Act.
46 Articles 5 and 13 of the AI Act.
47 Available at: https://search.coe.int/cm#{%22CoEIdentifier%22:[%220900001680a5ddd0%22],%22sort%22:[%22CoEValidationDate%20Descending%22]}.
48 Available at: https://search.coe.int/cm#{%22CoEIdentifier%22:[%2209000016809e1154%22],%22sort%22:[%22CoEValidationDate%20Descending%22]}.
49 Available at: https://search.coe.int/cm#{%22CoEIdentifier%22:[%220900001680092dd4b%22],%22sort%22:[%22CoEValidationDate%20Descending%22]}
50 Available at: https://rm.coe.int/1680afae3c.
51 Available at: https://rm.coe.int/cdmsi-2023-014-guidelines-on-the-responsible-implementation-of-artific/1680adb4c6.

The Convention on Human Rights is an important document in this field as well. Article 10, which addresses freedom of expression, as well as the obligations that come with exercising this right, can be applied to the use of different communication technologies that journalists employ to support their daily work. This includes the obligation to use AI systems in a manner compatible with human rights and fundamental freedoms, supporting truthful information as a matter of public interest, and the media as platforms for public discourse and critical public oversight. In addition to protecting freedom of expression, the Convention is relevant in this context because it also calls for respect for the right to privacy (Article 8), the right to human dignity and freedom of thought (Article 9), as well as the prohibition of discrimination (Article 14).

The Committee of Ministers' Recommendation CM/Rec(2022)4 to member states on promoting a favourable environment for quality journalism in the digital age explicitly encourages media organizations to benefit from the opportunities offered by digital technologies, including AI systems. Nowadays, the ability to uphold the human rights of citizens, journalists, and media organizations cannot be viewed in isolation from the influence of other actors, such as technology companies and online intermediaries, on media ecosystems – specifically in the creation, dissemination, and use of information. On the other hand, AI systems can have useful applications in all segments of journalistic work, from research and data analysis to news production, distribution, and interaction with the audience.

In the next section, we will examine in more detail the *Guidelines on the Responsible Implementation of Artificial Intelligence in Journalism* (hereinafter referred to as the Guidelines), as this document holds the greatest significance in the context of this study. The Guidelines are based on existing Council of Europe documents and are aligned with them, particularly with the *Framework Convention on Artificial Intelligence*.

II.2.1. Guidelines on the Responsible Implementation of Artificial Intelligence in Journalism

The Guidelines define AI systems in a general sense, as well as AI systems used in journalism.

AI system in general is defined as "any algorithmic system (or combination of such systems) that uses methods derived from statistics or other mathematical techniques to generate text, sound, image, or other content, or either assists or replaces human decision-making".[52]

Journalistic AI systems are defined as "artificial intelligence systems directly related to the business or practice of regularly producing information about contemporary affairs of public interest and importance, including the research and investigation tasks that underpin journalistic outputs. This can include (but is not limited to) large language models and generative AI when used for journalistic purposes and/or news organizations. Journalistic AI systems are not a single technology but a range of different, often interlinked tools for automating specific tasks."[53] Typical users of AI in journalism are media organizations and their employees.

52 https://rm.coe.int/cdmsi-2023-014-guidelines-on-the-responsible-implementation-of-artific/1680adb4c6, page 7.
53 Ibid.

AI systems in a broader sense can be used for generic tasks common to different business entities and organizations, and can be seamlessly integrated into office software, search engines, smartphones, and a wide range of other software and hardware.

Journalistic AI systems, as defined in the Guidelines, are u in news production, e.g. in data analysis for investigative journalism and fact-checking. They can be used automated text, video and audio

generation as well as for translation and transcription. In terms of media content dissemination, they assist in matching content with the appropriate audience through personalisation and the use of news recommender algorithms, or in organizing and customising content. In addition, journalistic AI systems can serve as a means to engage with audience, e.g. through chatbots and virtual assistants, or for developing new pricing models.

Thus, journalistic AI systems can be used for many different tasks. Some journalistic tasks are more suitable for automation than others. Routine tasks that can be executed by following explicit instructions are more amendable to automation, whereas tasks that depend on context and require expert judgment, creativity, and discretion are less amendable to automation, or at least require more human oversight and approval. In carrying out a large portion of journalistic tasks, the success of media organizations often depends on the technology provided by AI vendors, data, and computational infrastructure. The ability to innovate journalistic AI systems and use them in line with professional ethics and human rights can contribute to the sustainability of journalism in the digital age.

The purpose of the Guidelines, therefore, is to define principles for media organizations and media professionals that implement the journalistic AI systems. They also offer guidance to AI technology providers and platform companies. Finally, they provide guidance for States and national regulatory bodies on how they can create conditions for the responsible implementation of journalistic AI systems.

The document assumes that the decision to implement journalistic AI systems in the newsroom is a strategic choice with important consequences for internal processes and workflows. Many different stakeholders, both inside and outside news organizations, can be involved when journalistic AI systems are adopted, and a wide variety of AI subjects can be impacted. Therefore, an assessment on the use of such systems should recognize different perspectives and interests, and consider both procedural aspects (e.g., who decides and how) and substantive aspects (e.g., what to optimize for).

The Guidelines cover the decision to use journalistic AI systems, identifying and acquiring them, and incorporating them into the organizational and professional practice within media organizations. They also address responsibilities toward the audience, and for external technology providers, platforms, and States.

II.2.1.1. The decision by media organizations and journalist to implement AI systems

The decision to implement journalistic AI systems should not be purely technology or commercially-driven, but also mission-driven in that it will help achieve the goals and align with the values of the news organization in question. AI systems should be embedded within a broader vision of the media, including their business models, the challenges they face, their democratic role, the promotion of human rights and professional ethics, and the role of technology in each.

It is important to note that the decision to implement AI systems in journalism is an editorial decision insofar as it is critical for the realization of the editorial mission and professional values of a media outlet. Therefore, each media organization should clearly designate a person accountable for the implementation and the outcomes of using AI systems. This is typically expected to be the editor-in-chief, and the editorial staff should have a clear understanding of the AI systems already in use and how they function.

The decision to integrate AI systems into regular newsroom workflow should be based on the actual task or problem that these systems are intended to address.

A systematic risk assessment is a fundamental prerequisite for the responsible development and application of journalistic AI systems. Media organizations must have procedures in place to recognize, assess and, whenever possible, mitigate risks associated with the use of AI systems. These risks may be related to third-party rights (such as data protection, copyright, and non-discrimination), the environment, internal or external workers' rights, the rights of copyright holders, and the rights of individuals and communities that may be affected by the use of AI.

Risk assessment procedures should include the experiences and perspectives of affected individuals and communities. It is also important to recognize that the procuring AI systems can itself carry risks, such as the loss of full control over data, methods, and processes.

II.2.1.2. Identification and acquisition of AI systems – media organizations and professional users

Once media organizations have identified automatable journalistic, a decision should be made about the journalistic AI systems' acquisition. Options include procurement of AI technology from external provider (which may involve subscribing or paying for access to a remote system) or in-house development. Responsible use of journalistic AI starts with responsible procurement.

Many journalistic AI systems need to be trained – "fed" with data to become functional and useful. Therefore, it is very important to rigorously assess data availability, fairness, and quality. When using data that pertain to AI subjects (which includes the audience), privacy and data protection rules must be observed, and adequate measures applied to counter biases, stereotypes, and other harmful differentiations in order to ensure responsible system operation. Training data must respect the

rights of others, including copyright holders – which, as legal frameworks evolve, may also require obtaining consent or offering certain compensation schemes. In some cases, media organizations may rely on technology providers to make assessments about data, because they do not have direct control over the training processes.

II.2.1.3. Incorporating AI tools into professional and organizational practice

Journalistic AI systems require both technical and organizational infrastructure to support them. It is therefore recommended that media outlets build and maintain this infrastructure by hiring new staff or upskilling existing staff. News organizations should avoid simply replacing trained journalists with technical staff but should aim to develop AI competencies among all employees. It is also recommended that in making decisions about personnel, diversity and inclusiveness are carefully considered, with special consideration given to the representation of minorities, women and historically marginalized groups, as this can shape the use of AI and the resulting outputs.

Journalistic AI systems can be used to perform highly automatable tasks within existing routine jobs, freeing up time and resources for other activities. However, editorial oversight is necessary even for such tasks to avoid incorrect or biased processes and outputs. For example, even well-written and plausible-looking automated texts must be properly checked for potentially misleading, incomplete, or factually incorrect claims – and their identification requires expert knowledge and editorial oversight. Editorial oversight should go beyond fact-checking and extend to the processes that produced any errors. This is particularly important when the data involved are highly sensitive (e.g, those with concrete consequences for individuals) or highly consequential (e.g., those that may impact society, such as election results), or when the output is produced with the help of generative AI. Formalizing professional values into any code cannot replace editorial oversight and control.

Media outlets must continuously assess the risks associated with the use of AI systems. They are also obligated to clearly disclose when they use AI to both the audience and subjects, especially when it may meaningfully affect their rights or the interpretation of outputs. Within the media organization itself, it is necessary to ensure the availability of information about which systems have been implemented, what they are designed for, what values they reflect, and what measures have been taken to train staff and ensure adequate oversight. Standardized forms of labelling to indicate when AI systems were used in the workflow will contribute to transparency and increase trust among different stakeholders and audiences.

Working with journalistic AI systems often requires skills that go beyond the existing training of most journalists. Therefore, media organizations should provide ongoing training on the use of journalistic AI systems for staff, with programmes that bring together technology experts and journalists, stimulate awareness for human rights (such as the right to privacy and non-discrimination), and professional ethics. These programmes should also help employees build the skills needed to work in contemporary news organizations and prepare them for likely future developments.

Developing and implementing journalistic AI systems in line with a media outlet's mission requires room, time, and long-term investment. Some media organizations, such as public media services and large commercial media, are better positioned than others to meet these demands. In some cases, there may be options of voluntary sharing of research, methods, and best practices. Well-resourced public media services can play an important, pioneering role in developing and applying journalistic AI systems. Moreover, supporting research and innovation in the development and deployment of value-sensitive technologies can be considered part of their public mission, enabling them to share their own experiences, best practices, and technology (where feasible) with other stakeholders (including other media organizations) and to encourage public debate of the role of AI in society. Such an approach would help develop shared standards of responsible AI implementation and development, strengthening the overall resilience of the media sector.

II.2.1.4. Responsible use of AI tools in relation to users and society

Although journalism enjoys wide protection under Article 10 of the European Convention on Human Rights and Fundamental Freedoms, this protection comes with certain responsibilities and duties toward citizens and the public at large. Both the rights and responsibilities stemming from this provision extend to technology, thus also involving an obligation to use digital technology (including journalistic AI systems) securely and responsibly, i.e., in accordance with the ethics of journalistic, aligned with professional codes, and in a way that does not impinge upon the rights of others.

Media outlets and journalists play an important role in developing and regularly updating standards on the responsible use of journalistic AI systems (also when using third-party technologies). Their vision should be transparent and articulated through self-regulatory and organizational codes, mission statements, and internal guidelines. Ideally, such standards should be developed through an inclusive process geared towards understanding how AI can affect different groups in society and different societal interests. By taking on these responsibilities, media organizations also get the opportunity to distinguish themselves through their specific role relative to other professions, and to demonstrate accountability to the public when using AI systems. Additionally, the media play a key role in informing the public about AI and its implications for users and society at large.

Traditional journalistic values such as impartiality, autonomy, accuracy, diversity, truthfulness, and objectivity remain relevant in the context of journalistic AI systems, although they may require re-formulation or re-conceptualization in the light of the new affordances and risks that come with the use of AI technology. It may also be necessary to formulate and operationalize new priorities, for example concerning data quality and fairness, system security, and expert oversight of AI deployment.

II.2.2. Platforms that disseminate news

Given that platforms that disseminate news or intermediate news have long used AI to operate at a large scale, recommendations by the Committee of Ministers on media and communication governance, media pluralism, and quality journalism are relevant to them as well. These recommendations remain applicable both for the role of platforms in creating conditions for the responsible implementation of AI systems in journalism and for the systems they use for dissemination of journalism. This includes the development of appropriate internal governance responses to ensure that content is universally available, easy to find, and recognized as a trusted source of information by the public, as outlined in Recommendation **CM/Rec(2022)4.**[54] The same document clearly suggests that platforms must not restrict access to news based merely on political or other opinions.

Guidelines Note on the Prioritization of Public Interest Content Online[55] **by the Council of Europe** recommend that platforms, intermediaries, and States establish "regimes of prominence" which determine who sees what content online. These regimes can contribute to promoting trusted news and accurate information, as well as greater diversity of online content. However, they can also be exploited for censorship or propaganda, which has direct implications for democracy and human rights. States should take measures to make content of public interest more prominent, including by introducing new obligations for platforms and intermediaries, and also impose minimum transparency standards.

Also relevant for platforms is the Recommendation on principles for media and communication governance **(CM/Rec(2022)11)**,[56] which calls on States not to interfere with journalistic content and to refrain from imposing editorial standards. It recommends cooperation with media, civil society, and other relevant stakeholders, such as fact-checkers, in the fight against disinformation and manipulation.

As emphasized in the Recommendation, it is important to ensure that algorithmic bias does not violate human rights and fundamental freedoms, to provide users with the option to disable news personalization, and to offer alternative forms of personalization. Platforms must also increase transparency, accountability, explainability, and inclusiveness of the systems used for personalizing the delivery of news content by providing clear information about their use, nature, purpose, and functionality.[57]

54 Available at: https://search.coe.int/cm#{%22CoEIdentifier%22:[%220900001680a5ddd0%22],%22sort%22:[%22CoEValidationDate%20Descending%22]}.
55 https://rm.coe.int/cdmsi-2021-009-guidance-note-on-the-prioritisation-of-pi-content-e-ado/1680a524c4
56 Available at: https://search.coe.int/cm#{%22CoEIdentifier%22:[%220900001680a61712%22],%22sort%22:[%22CoEValidationDate%20Descending%22]}.
57 *Ibid.*

II.2.3. AI and media self-regulation

With the rapid development of generative AI, newsrooms face numerous new challenges regarding the adherence to professional standards. Although there is no unified ethical standard in this field, many media councils in Europe have established guidelines or included chapters dedicated to the application of AI in journalism in their ethical codes.

The implementation of AI must be regulated in a way that enables journalists to work more efficiently, quickly, and innovatively, rather than replacing them. **The Press Council for the Dutch-speaking region in Belgium** was the first press council in Europe to include guidelines on the use of AI in its code. These guidelines are based on two fundamental principles: (1) the newsroom is always responsible for what is published, and (2) the public must be informed about all aspects of the use of AI in journalism.

> "Artificial intelligence can play a role in gathering, editing, producing, and distributing news, such as articles, reports, illustrations, infographics, etc. In such partially or fully automated processes, editorial decisions play a significant role. These decisions must be in line with the principles of the Code.
>
> "The editorial staff is responsible for these decisions, and the editor-in-chief bears ultimate responsibility. The newsroom guarantees the application of the Code's principles while developing systems that are fully or partially AI-driven. The editorial team is always responsible for the information that is published, regardless of how it is produced and regardless of the medium or form in which it is made available to the public.
>
> "The editorial team communicates transparently about the automated production of news and the personalization of the news offered, so that users clearly understand when the production or selection of news is based on AI."[58]

Other media councils also prioritize transparency in the use of AI in their ethical codes. The **British Impress** Code highlights the potential benefits of using AI in journalism, as well as challenges related to accuracy and transparency. Thus, clauses 10.5.1 and 10.5.2 of the Code state:

> "When using AI to generate, publish and disseminate news, publishers must exercise editorial oversight to ensure that their use of it is transparent. Publishers should prominently label content that has been recommended to people by automated systems based on their individual behaviour and data and provide them with easily accessible options to opt-out from the same. In addition, publishers should disclose what data they hold about people and how it has been used to make targeted recommendations."
>
> "Publishers should be aware that people are entitled to complain about AI-generated content in the same way that they do for human-generated content. Publishers should make it clear that they are responsible for the content where it has been produced in

58 Available at: https://www.rvdj.be/node/210

> this way. Finally, publishers should clarify what editorial mechanisms or policies they have in place regarding their use of AI."[59]

Some media councils have considered that it is not necessary to create new guidelines to regulate the use of AI in journalism, but that existing provisions can be used for this purpose. For example, the **German Press Council** (*Deutschen Presserat*) has applied the guideline related to symbolic photographs and illustrations to AI-generated images in several cases.

The Chairman of the **Dutch Press Council** (*Raad voor de Journalistiek*), Frits Van Exter, recently wrote in his blog that journalistic responsibility is key, regardless of whether the publication is the work of the editor-in-chief, a trainee, or a chatbot. "And whoever holds responsibility," he says, "must be prepared to be accountable to the public. The use of AI is therefore subject to the same principles as any other journalistic conduct."

In **Estonia**, the Journalists' Code does not address the use of AI in journalism, but the public broadcaster (ERR) has added the following new section to its internal best practices document:

> "Responsibility for decisions made with the help of AI lies with humans. Journalistic content created using AI is always reviewed by an ERR editor. AI solutions used by ERR must not compromise ERR's journalistic credibility. ERR will inform the audience if AI has been used to a significant extent in the creation of journalistic content."

The Armenian Ethics Code was amended in 2024 with provisions (6.5–6.8) offering journalists and media outlets the following guidelines:

> "When creating content using generative AI tools, clearly indicate the AI models used, specifying the nature of the algorithms they employ and their potential shortcomings.
>
> Scrutinize the final media content and fix any errors or ethical violations caused by AI usage before it is published.
>
> When using AI tools, exclude the disclosure of anonymous sources and sensitive personal data.
>
> Follow as much as possible international practices of ethical regulations in the AI sector and novelties, and apply them when creating media content."[60]

At the end of 2024, **Moldova** also amended its Journalists' Code by adding a chapter (3.1–3.7) on AI:

> "The use of AI in journalism must support the core values of professional ethics: truthfulness, accuracy, fairness, impartiality, independence, non-discrimination, accountability, respect for privacy, and confidentiality of sources.

59 Impress, *Guidance on the Standard Code*, 2023. Available at: https://www.impressorg.com/wp-content/uploads/2024/01/Guidance-on-the-Impress-Standards-Code.pdf#page=68.
60 Available at: https://ypc.am/wp-content/uploads/2025/01/Code-of-Ethics_eng_edited_May-18-2024.pdf

> "When using AI, editorial decision-making remains an essential and exclusive role of journalists and media outlets.
>
> "Journalists and media outlets should use AI systems that operate predictably and do not violate privacy and data protection laws.
>
> "Journalists and media outlets give priority to using authentic images and recordings when presenting actual events. Where appropriate, they make a clear distinction between content derived from physical recordings of the real world (photos, audio/video recordings) and AI-generated or modified content.
>
> "When using AI, journalists must not mislead the public. It is especially important to refrain from creating or using AI-generated content that imitates real recordings or realistically depicts actual people.
>
> "Journalists must explicitly inform the audience that a media product has been AI-generated in whole or in part.
>
> "When using AI, journalists must not violate copyright or intellectual property rights."[61]

Serbia also supplemented its Journalists' Code in the same year (2024) with provisions on AI:

> "Media outlets must use AI tools in creating content transparently, responsibly, and proportionately, and are fully responsible for such content. They must notify the public when media content has been created using AI tools."[62]

The introduction to the updated **Ethical Rules for Danish Journalists** (2023) states: "The rules also apply to editorial elements that are fully or partially produced using AI, and therefore this content falls under the Council's regulatory guidelines and will comply with the ethics of journalism."

The **Finnish** Ethical Code for Journalists, updated in 2024, does not contain any new provisions regarding AI, but notes that the editorial team is responsible for all content, regardless of how it is produced, published, or delivered. The Finnish Council for Mass Media clarifies:

"It is highlighted in our 2019 statement on the use of algorithms and AI that the public has the right to know when news has been automatically generated. This applies to all content produced with the help of AI. Of course, journalists can use AI in their work, just as they use any other tool. Therefore, it is not necessary to disclose this, just as it is not necessary to mention other basic tools used for collecting, processing, or publishing information."

61 Available at: https://www.consiliuldepresa.md/ro/page/codul-deontologic-al-jurnalistului-din-r-moldova
62 Available at: https://savetzastampu.rs/dokumenta/kodeks-novinara-srbije/

The press councils of **France, Catalonia**, and **Switzerland** have adopted guidelines on the use of AI in journalism, which will not be detailed here due to their length. These guidelines address in great detail the risks journalists and media outlets face when using AI, highlighting mandatory transparency and editorial responsibility for AI-generated content.

Many other media and press councils are currently in the process of preparing new clauses or guidelines on the implementation of AI in newsrooms.

Media freedom organizations, led by Nobel Peace Prize laureate Maria Ressa, have developed the *Paris Charter on AI and Journalism*,[63] which defines ten principles that journalists and newsrooms should take into account when using AI in their work. One of the main criticisms of this document concerns the absence of references to journalistic self-regulation practices – the text does not mention press councils, ethics councils, or similar bodies, even though such bodies play an essential role in assessing the ethical nature of using AI in the media.

63 Available at: https://rsf.org/sites/default/files/medias/file/2023/11/Paris%20Charter%20on%20AI%20and%20Journalism.pdf.

III. Analysis of expert opinions – professional views on understanding and the potential application of AI in journalism

To help Montenegrin journalists navigate the challenges of working in an era of rapid technological development, we conducted a series of interviews and discussions with prominent national, regional, and international experts in the fields of media and AI. Their insights, experiences, and recommendations provide valuable contributions to understanding both the potential and the risks that the use of AI brings to the journalistic profession. With the aim of offering the Montenegrin media community concrete guidelines for the responsible and professional use of AI technologies, we paid special attention to dilemmas related to credibility, transparency, and ethical standards when working with these powerful, yet unpredictable tools.

III.1. AI as a silent driver of transformation in journalism

Artificial intelligence is the driver of a *silent* revolution, says Neđeljko Rudović, Director of the Directorate for Media at the Ministry of Culture and Media. Associate Professor Jovana Davidović Vuletić, PhD, teaching associate in the Media Studies and Journalism programme at the Faculty of Political Sciences, University of Montenegro, emphasizes that "AI is changing our society on multiple levels," and therefore, "journalism is not exempt from such changes." Media experts and university professors Tanja Keršovan and Joan Barata, as well as Milan Jovanović, Sunčica Bakić, and Ana Nives Radović, share the same view. They agree that AI has transformed the processes of collecting and curating information, making them significantly easier through the use of models and systems built on human-initiated prompts and outputs based on machine learning processes. This means that collecting and curating data, structuring information sources, and obtaining a general overview of concepts and topics have become much more efficient. "It goes without saying that human oversight is essential before finalizing the compilation and systematization of information, due to potential biases and AI hallucinations," says J. Barata of Vanderbilt University. Professor Zvezdan Vukanović, PhD, member of the Board of Directors of the International Media Management Academic Association in Doha (Qatar), believes that AI has not only had a transformative impact on journalism but has also changed the very structure of the processes of collecting, analyzing, and presenting news. In his view, **the revolution brought by AI is not a hypothetical future possibility but an active and continuously evolving reality**, whose influence is constantly expanding and deepening across today's media landscape.

III.2. Advantages of AI in journalism: richer content, greater efficiency, and new visualization options

According to Ratko Ćetković, head of the Technical Service at the daily newspaper *Dan*, key advantages of AI lie in enriching and linking content, ease of preparing it for multiple platforms, and simpler structuring of information. He warns that there is still a significant risk of errors since AI gives no indication when it provides inaccurate information. When creating photo and video content, attention must be paid to elements of visual presentation, as the use of inappropriate symbols, inaccurate depictions, and incomplete solutions can occur.

Our interlocutors see the greatest benefit of AI in everyday journalistic work in increased efficiency and time savings. Routine, repetitive ("grunt") tasks have been simplified and accelerated, and the way data is analyzed and collected has become much easier. AI tools are most often used for creating transcripts, translating, producing illustrations, infographics, and headlines, as well as for organizing, accessing, and more efficient use of archives. However, there are significant differences in the pace of AI integration in newsrooms, points out Tanja Maksić, a journalist at BIRN. She notes that this depends on a number of factors, primarily on how technologically and digitally literate the journalists are, whether they have sufficient resources, if they are part of larger systems where there is interest in faster AI integration, and so on.

Đorđe Krivokapić, associate professor at the Faculty of Organizational Sciences at the University of Belgrade and co-founder of the Share Foundation, believes that all three aspects – collection, analysis, and presentation of news – have been completely transformed. Data journalism is in full bloom precisely thanks to technological development, as sophisticated AI tools for data collection and processing enable much more work to be done in much less time. Regarding the analysis of collected data, he emphasizes that large language models have made a real revolution – a huge quantum leap in this type of journalism. Finally, significant changes have also occurred in presentation – AI has offered us visualization possibilities for media content that were unimaginable until recently. However, Krivokapić sees the greatest change in distribution, which has altered the very foundations of the media industry and radically transformed the media ecosystem. According to him, the newsroom is also changing. Newsrooms now collect data about themselves and their users to determine which news to publish and where, for which to follow up, and so forth.

On the other hand, Tanja Maksić points out that all these changes reach the more peripheral areas of the global media system with a certain delay. As she notes, working with users is still a completely unexplored and untapped area of AI application in Serbia – for instance, through personalized subscriptions, comment moderation, and similar forms of interaction that could help expand the audience.

III.3. Key risks: efficiency at the expense of content homogenization, disinformation, declining quality and ethical standards

Ratko Ćetković warns that, while AI holds huge potential for effectively combating disinformation, it can also be used to create fake news and deepfake content, fostering an environment ripe for disinformation and contaminating the media landscape with false and manipulative content. He notes that specialized AI models can rapidly produce vast amounts of content and distribute it through different online channels.

Zvezdan Vukanović notes that AI improves efficiency, scalability, and data analysis but simultaneously threatens editorial autonomy, boosts disinformation, homogenizes content, and destabilizes the journalism labour market. Bearing all this in mind, he is convinced that the key challenge lies in

finding a balance between technological innovation and journalistic integrity, to ensure AI functions as support rather than a destructive force in the media landscape. From this, he concludes: "The future of AI in journalism will not be shaped by technological inevitability but by ethical intention – the decision to use AI in the service of truth, democracy, and the timeless human need for storytelling."

Zvezdan Vukanović:

> "AI must assist, not replace. AI must enrich, not homogenize. AI must inform, not distort. [...] the essence of journalism remains human."

Our interlocutors have varying assessments regarding the danger of excessive homogenization of media content. Mihailo Jovović, Editor-in-Chief of the daily newspaper Vijesti, believes that at least half of media content is already homogenized in Montenegro. A large number of media outlets passively echo what has already been said or written – not only press releases, statements, or announcements from politicians but also the same or nearly identical articles. According to him, the problem is not AI but people. Jovović identifies one of the biggest risks as the possibility that journalists may become complacent and accept what the chatbot provides without verification. Similarly, Đorđe Krivokapić says that if we have professional newsrooms that use AI as a tool, we will see greater diversity, but if newsrooms focus only on "recycling" trending content, we will have homogenization as a result. "Too many parrots," he says, "cannot survive."

Tanja Maksić considers this a very complex issue because it involves multiple stakeholders. First, the media community must be motivated to use AI tools responsibly and ethically; next, the audience should be educated to demand better and higher-quality content; finally, institutional capacities must be strengthened to address the lack of pluralism through regulatory measures. Finally, dialogue should be opened with tech platforms to stop their algorithms from favouring uniform content – a trend that, unfortunately, is already noticeable. On the other hand, Krivokapić emphasizes that good journalists will always find their unique perspective, carefully select data sources, and include them in analysis, maintaining full control over what is published. He is confident this will ensure pluralism and diversity.

Our interlocutors agree that the greatest risk of AI use in journalism lies in delegating decision-making to AI systems on matters where human intervention remains absolutely necessary – such as expressing opinions, applying the highest professional standards, and resolving ethical dilemmas. They believe that AI use can endanger journalists' autonomy, encourage content homogenization, and weaken critical approaches. A particular problem is algorithmic bias and the lack of transparency in the functioning of algorithmic models. Moreover, reduced oversight over information sources used by journalists increases the risk of spreading disinformation. The hyper-production of inaccurate and fake text, audio, and video content can lead to a loss of control over accuracy – one of fundamental values in journalism.

Mihailo Jovović:

> "In Montenegro, at least half of media content is homogenized."

Among the most significant risks of using AI in journalism is the uncritical use of AI tools without verifying the accuracy and sources of information, respecting copyright, and other aspects of intellectual property. According to Sunčica Bakić, Director of the Agency for Audiovisual Media Services, one of the key risks is that inadequate use of AI could lead to a drastic decline in the quality of journalism and the spread of disinformation. In her view, this points to the need for careful and responsible implementation of AI, with clearly defined guidelines and established control mechanisms.

Mihailo Jovović notes that the editorial staff of *Vijesti* uses a whole range of AI tools and undergoes training for their professional and responsible use, yet he still emphasizes the need for caution. The main risk, in his opinion, lies in publishing content without verification. In other words, professional journalists who understand AI and know how to use it are able to manage the risks effectively. For Neđeljko Rudović as well, the greatest danger lies in excessive reliance on AI systems. He stresses that AI tools should be used strictly as an aid, not as a replacement for journalistic work.

Teodora Ćurčić, a journalist with the Centre for Investigative Journalism of Serbia, shares a similar view. She believes that journalists should continue doing what they have always done – applying the fundamental principles of journalism and verifying information obtained from unknown sources according to professional standards – while being mindful of the additional risks brought by AI. She sees a serious threat in the potential absence of a human control factor, which she considers essential and irreplaceable. Tanja Maksić also emphasizes this, highlighting that preserving the authenticity of journalistic expression and editorial responsibility is of key importance. In her view, journalists should treat AI solely as a tool, while all key decisions regarding content quality must be made by the editorial staff.

Teodora Ćurčić:

> "Journalists should continue doing what they have always done – verifying information obtained from unknown sources in ways prescribed by the profession."

Ćetković highlights the potential copyright violations as one of the risks, as AI can use existing content without proper attribution or the author's permission. He is confident that the use of AI will not endanger the core principles of journalism as long as AI is used as an auxiliary tool and with human oversight. He adds, however, that problems can arise with fully automated systems. T. Maksić agrees, pointing out that alongside conventional issues – such as a captured media system, an

inadequate regulatory body, and underfunded media outlets – the arrival of AI brings new challenges in Serbia. The risk always lies with people, says Krivokapić: if people are unaware of a technology's risks, it is people, not the technology itself, who pose the risk. In other words, the bigger risk stems from people lacking the capacity to understand and use the technology responsibly, rather than from its malicious use. It's true that the technology "hallucinates," he says, and that it is biased based on the data it has, but if there is a person who understands those risks, then there is no problem. However, if we don't focus solely on professional newsrooms, which we assume operate ethically and responsibly, but look at the entire media ecosystem, where we have propaganda machines, spin doctors, and malicious actors, the game becomes much more complex, and in that context, AI poses a huge threat.

T. Ćurčić identifies one of the greatest risks in irresponsible and/or malicious citizens acting as media content creators, singling out the creation of a new type of so-called AI-generated revenge pornography as a particular problem. Numerous "undressing" bots on different social media platforms represent a new form of gender-based violence, primarily against women, which in Serbia is still not legally sanctioned. Deepfake pornography is a form of abuse and misuse of photos or videos that are altered by AI to create sexually explicit content. She says that the abuse of celebrities is just the tip of the iceberg, with women as the primary targets, referencing an investigative article by Anđela Milivojević[64].

III.4. Use of AI in newsrooms: limits of automation and irreplaceable human essence of journalism

AI should serve as support for routine tasks, not as a replacement for journalists, says Tanja Keršovan, Associate Professor at the Faculty of Social Sciences, University of Ljubljana. Z. Vukanović shares the same view. Analyzing the relationship between ethics and artificial intelligence, he emphasizes: AI should assist, not replace; enrich content, not homogenize it; inform, not distort. And even when AI is used, the essence of journalism remains human, Vukanović insists. For him, the key question in modern journalism is therefore not whether to integrate AI (which is already an undeniable reality), but how to integrate it in a way that protects, strengthens, and enhances the fundamental principles of journalistic integrity, objectivity, and credibility. That is why he advocates for a strong affirmation of the principle that *AI should complement, not replace, journalism*.

Tanja Keršovan:

> "AI should serve as a support for routine tasks, not as a replacement for journalists."

64 Available at: https://birn.rs/bila-sam-nemocna-ispovesti-zena-i-devojaka-sirom-srbije-o-uzasnim-posledicama-osvetnicke-pornografije/

Artificial intelligence is not yet developed enough to fully replace people in the roles of journalists and editors, but it can take over some simpler tasks and help automate newsroom operations, says Sunčica Bakić. In her opinion, what gives a special flavour to quality journalism are creativity, authenticity, and fieldwork, in which journalists remain irreplaceable. Tanja Keršovan also stresses that AI can only take over some tasks. In her view, AI cannot replace critical thinking, contextual understanding, the ability to interpret within current social and cultural frameworks, ethical responsibility, creativity of journalists, nor the role of the editor as the person responsible for the media product. All interlocutors agree that AI is useful for executing routine tasks, but journalism is not merely about conveying information. Media are made up of recognizable faces with whom the audience identifies and connects on a human level – and that is exactly what AI lacks. At this point, humans and AI systems necessarily complement each other, concludes Joan Barata.

Sunčica Bakić:

> "It is necessary to introduce AI into journalism carefully and responsibly, with clear guidelines defined and control mechanisms established."

When it comes to the diversity of media content, it can be preserved by maintaining journalistic jobs and the role of editors, as well as by limiting AI only to routine tasks. If AI is already in use, different, open, and decentralized AI models should be chosen, based on adherence to ethical standards. Expressing his view on the impact of AI on the future work of journalists and editors, R. Ćetković says:

> "AI enables high productivity of journalists and editors, which will offer newsrooms a choice – either to increase outputs in terms of quantity or quality, or to reduce the number of journalists and editors. Some sections can already be fully automated, while AI is gradually taking over parts of others. It is easy to understand what this means in practice: one editor can be responsible for several related sections, and a journalist can produce more information, meaning that fewer journalists are needed in the newsroom."

According to Jovana Davidović Vuletić, newsrooms need to define the obligation of human oversight, ensure ethical use of data, and invest in training journalists and other media professionals on responsible use of AI systems in newsrooms. She points out that certain news agencies have been using AI software and natural language processing models for years to process large amounts of information and present it to audiences in a familiar way. In this context, she cites the example of The New York Times, which appointed a director and editor for AI initiatives in late 2023. For her, AI remains a "field under development," and the traditional ways of collecting, analyzing, and presenting news continue to exist even in media outlets that have AI departments and human oversight roles for such content. Although AI use in news presentation is noticeable in some newsrooms, traditional journal-

istic skills are still predominantly used in Montenegro. For these reasons, she believes it is important to think in terms of coexistence rather than mutual exclusivity.

The notion that AI can replace people, journalists and editors, is quite misguided, especially in the context of complex media ecosystems, says Đ. Krivokapić. In fact, people must acquire new skills to use technology responsibly, he emphasizes. There are many tasks where AI becomes a key partner to the employee; some of these tasks disappear, others undergo complete transformation, and some remain. Krivokapić recalls typists and typing pools, which used to be part of every organization but have "become extinct." Today, AI provides us with different personal assistants specialized for certain tasks; instead of hiring interns to sort material, transcribe, or translate, we already have AI assistants for that – without needing to train them, explain tasks, or supervise their work. Those steps remain unchanged; only the "intern" is now AI. Our interlocutors see the greatest advantage of AI application in everyday journalistic work in improved efficiency and time savings. Routine, repetitive, "foot soldier" tasks have become simpler and faster, and data analysis and collection easier. As already mentioned, AI must be integrated into journalistic processes to accelerate tasks that require time and resources, especially when collecting and structuring relevant information, for example regarding election results. However, decisions on the importance of topics and information, editorial positions, and application of professional standards must still remain in human hands, Barata stresses.

Đorđe Krivokapić:

> "If we have professional newsrooms that use AI as a tool, we will have greater diversity; but if we have the other kind [...], it leads to homogenization."

All of this does not mean that internships will "die out," says Krivokapić, nor that anything similar could happen to the journalism profession – those who are willing to learn and adapt will find their place. According to him, it is the lack of knowledge that prevents adaptation and "survival". On the other hand, Rudović believes that in the future, the best journalists will not always be those who excel in the traditional aspects of the job, but rather those who combine that with the efficient use of AI tools. Krivokapić concludes, however, that we must not lose sight of an old skill that is not technological – and that is critical thinking.

Joan Barata:

> "Decisions about the importance of topics and information, editorial positions, and the application of professional standards must remain in human hands."

III.4.1. AI regulation through codes and professional standards

Jovana Davidović Vuletić highlights the obligation to observe ethical principles when using AI, as well as in all actions in the online environment. She believes that key journalistic standards – fairness, accuracy, truthfulness, balance, and impartiality – are applicable to all changes we may face under the influence of technology. She is confident that there is always a way to use even what is new, unexplored, and powerful in an ethical manner. She adds that, for the time being, it would be advisable for newsrooms to consider drafting internal guidelines modelled after the Paris Charter and the provisions of the AI Act. She also highlights the need to amend the *Journalists' Code of Montenegro* (the Code), while acknowledging that it cannot fully regulate the use of AI systems and all unpredictable changes, nor is that its primary purpose:

> "However, since the use of AI will only continue to grow, it is important that the Code responds to new challenges as much as possible. First and foremost, I believe that the issue of AI in the Code should be addressed through three leading principles: transparency, human oversight, and accountability. The first principle concerns the obligation to clearly label any content created using AI and generative AI as such, and to clearly present this to the audience. Second, content produced by AI must not be published without human oversight – that is, without supervision and intervention from newsroom staff. Third, the media outlet is always responsible for the content it publishes, even if AI made that content inaccurate."

In terms of potential amendments to the Code, the interviewed journalists and experts agree: although the core principles of the profession remain unchanged, the document should be supplemented with guidelines on the use of AI in journalistic work. While the general principles of the profession remain the same, technology demands constant updates, says Tanja Maksić. The new guidelines should primarily cover transparency and editorial responsibility for content created with the use of AI, at all levels – from data collection, processing, and analysis to labelling and distribution of media content. It is important for this process of updating the normative ethical framework to be inclusive, she stresses, involving journalists, since the new provisions must be aligned with the views of those who will apply them.

Zvezdan Vukanović underscores the importance of the Code and its consistent application regarding the use of synthetically generated content, as well as the need for regular updates to the document in order to adapt it to ongoing technological challenges. He points out that the Code, like other journalistic ethical frameworks around the world, was developed in an era when journalism relied on reporting methodologies predominantly cantered on humans, whereas today's practice is shaped by a profound technological transformation, which includes algorithmic content generation, AI-assisted reporting, deepfakes, automated fact-checking, and data journalism. Therefore, Vukanović believes, the Code requires urgent and principled reconsideration to ensure its "continued relevance, integrity, and ethical robustness." In his view, the Code must evolve – not to diminish the role of AI in journalism, but to regulate and ethically frame its integration. By codifying transparency, accountability,

honesty, resilience against disinformation, and the sovereignty of human editorial control, Montenegro can take a proactive role in shaping journalism that is enhanced by AI, while still preserving its core principles. AI must serve journalism, not dictate it; ethical principles of journalism must guide algorithms, not be subordinate to them. Ultimately, the future of journalism must be powered by AI but led by journalists, Vukanović concludes.

Ratko Ćetković states that the Code must be amended to require the labelling of AI-generated content. Mandatory disclosure of the *creator* will enable the audience to recognize content created with the help of AI. In his opinion, when using systems that automatically generate content, for example, when AI creates an illustration based on a given text, that content must be labelled and credited as AI-generated. On the other hand, in cases where AI is used for structuring, modifying, and adapting content without changing the core information, he believes that there is no need to indicate AI involvement.

III.5. Development of legal frameworks for the use of AI in journalism

As regards the use of AI in journalism, Joan Barata believes that caution is needed regarding state intervention: "I would advise exploring the effectiveness of self-regulation and co-regulation mechanisms before considering the establishment of legal (and thus inflexible and 'top-down') rules in this field."

On the other hand, Sučica Bakić and Tanja Keršovan emphasize that regulators and policymakers should encourage the development of legal frameworks for the use of AI in journalism. They should also support independent oversight mechanisms, promote the development of responsible technologies in the public interest, and ensure the creation of an environment that fosters journalistic independence and pluralism of journalistic expression. According to their opinion, a key role in this process is played by national regulators, who are expected to actively participate in improving media regulation so that it reflects changes happening in the media market. "Besides regulators and policymakers, media, self-regulatory bodies, NGOs, organizations for personal data protection, intellectual property, consumer protection, as well as other social stakeholders, should actively participate in this process," says Tanja Keršovan. "It is important to support the development of adequate self-regulation in this field, i.e., the upgrading of existing standards and mechanisms by including elements related to the challenges of using AI in journalism."

Barata and T. Keršovan agree on the need to amend the Code with explicit references to the use of AI in journalism, as well as the limitations and ethical principles related to that practice. They emphasize that the main focus should be on responsibility in using AI tools, transparency of their use, and the preservation of editorial autonomy and the journalistic watchdog role. In contrast, Ana Nives Radović states that amending the Code would only be necessary if it is determined that AI causes irregularities and issues beyond those already covered by the document. However, she believes this will not be necessary since the Code broadly defines a range of issues, and everything related to ethics in journalism also encompasses AI.

Speaking about the situation in Slovenia, Tanja Keršovan explains how AI is gradually changing journalistic practice. This is particularly evident in larger newsrooms, where AI is used for automatic data analysis, recognizing patterns in large amounts of information, translating and summing up texts, and categorizing content. However, its application is currently very uneven, and the media community is awaiting a new law that will regulate this field more comprehensively. A new draft media law, which is still in parliamentary procedure, requires that content created using generative AI systems, regardless of whether it has undergone editorial processing, is clearly identifiable and labelled so that it can be easily distinguished from other programming. To illustrate the current relationship between AI and the media, T. Keršovan points out that the most popular news portal (*24ur.com*) has introduced a practice of labelling content created without the use of generative AI.

III.6. Labelling AI-generated content – manner and scope

Jovana Davidović Vuletić believes that media outlets should be fully transparent in their application of AI, adopt clear policies on the use of AI, and ensure human oversight and involvement at all stages of the process. "There is no doubt that any intervention in content must be labelled as such, even in the case of automated actions like translation," she underlines. Responding to the question of whether AI can replace journalists and editors, J. Davidović Vuletić says:

> "We've seen a situation at Microsoft, where a significant number of employees were laid off because their jobs were replaced by AI tools. I believe AI poses the greatest threat to automated jobs and that the labour market will change in that sense. When it comes to journalism, I am confident that nothing can replace journalists and editors, and that human contribution to this profession is indispensable. All things considered, although AI does affect automated tasks in journalism, I believe that human oversight will remain essential even for those tasks."

Tanja Keršovan and Sunčica Bakić believe that labelling is necessary in cases where AI significantly contributes to content creation – meaning whenever content is mostly or entirely automatically generated or substantially reshaped. On the other hand, minimal technical processing without affecting content poses a lesser risk.

Ensuring reliable differentiation between authentic and synthetic content, as well as ethically labelling content created with the help of AI, is crucial for maintaining public trust in the media and the information they provide. Therefore, the primary principle media should follow is transparency regarding how content is created. Although these issues are not regulated by law, an ethical approach to journalism implies that media consumers should be informed about the role of AI technology in content creation, regardless of the extent of AI's intervention in the process. Ratko Ćetković points out that at *Dan*, they always label content created by AI[65] and even create a specially styled logo for AI-generated videos.[66]

65 See: https://www.dan.co.me/kultura/audio-muzicka-poezija-5245096.
66 See: https://youtu.be/LNFJk4Jj-MM.

Joan Barata believes that excessive labelling should be avoided, as it can lead to confusion and unnecessary distrust. He says that labelling is necessary when presenting a certain type of content (for example, images illustrating a report) could confuse the audience. It must also be included in cases where AI is used for live event coverage or real-time, minute-by-minute reporting on ongoing events.[67]

Zvezdan Vukanović also addressed the economic implications of AI in journalism. Highlighting changes in terms of employment, cost reduction, and revenue models, he concludes:

> "The integration of AI into journalism is a transformational paradigm shift that redefines economic structures, labour dynamics, cost efficiency, and monetization strategies in the media industry. AI-driven automation, algorithmic content generation, and data analytics in journalism increase productivity, reduce operational costs, and restructure revenue streams, while at the same time raising key questions about job loss, market monopolization, and the commodification of journalistic content."

III.7. Education as a foundation for ethical and secure use of AI

Our interlocutors believe that media and information literacy programmes should be adapted to educate both journalists and the public about AI-generated content and its potential impact on public trust.

They believe training should be introduced on recognizing AI content, understanding its limitations, and verifying sources; the public should be taught critical thinking, and journalists should learn how to use AI in an ethical and transparent way. Unfortunately, this complex topic still does not receive enough attention, our interlocutors agree. Trainings are mostly organized as one-day seminars and workshops, which is insufficient to effectively address the core of the problem. They note that adequate long-term programmes, which would increase the resilience of the media sector and raise understanding of AI applications to a higher level over time, require a broader coalition of media and NGOs, as well as political will to put this issue on the agenda. Preserving professionalism and the quality of journalism through appropriate training and good self-regulation mechanisms is crucial to ensure transparency and accountability in journalistic content generated or assisted by AI. According to our interlocutors, mandatory labelling, clear internal rules, training of journalists and editors, and content verification mechanisms are essential. The audience must know how the content was created.

Hakile Resulbegović, MA, a teaching assistant in the Applied Psychology study programme at the Faculty of Applied Sciences, University of Donja Gorica in Podgorica, and an analyst at the Damar Institute, believes that AI training is becoming necessary because media outlets must train journalists to properly use tools and recognize their advantages and limitations. Additionally, in her view, ethical

67 For example, a bot that reports election results as soon as they become publicly available or transcribes speech as it is being spoken.

regulation plays a key role, so content involving AI in its creation should be clearly labelled to avoid manipulation and audience deception. As a good example of such practice, she points to the BBC, which uses AI for data analysis in investigative journalism, but the final narrative and interpretation are always shaped by a human.

Hakile Resulbegović:

> "AI training is becoming essential [...], journalists need to recognize the advantages and limitations of the tools."

Tanja Keršovan also believes that education for journalists, the public, public officials, and regulators needs to include AI-related topics: how algorithms work, what ethical challenges exist, how to recognize AI-generated content, and how to maintain trust in credible sources. Barata agrees that literacy in the field of AI application, just like computer or digital literacy, should be an indispensable part of all training or media education programmes.

Media and information literacy programmes need to be adapted to the new reality, in line with the growing role of AI in creating media content, says Sunčica Bakić. They must cover key aspects related to technology, ethics, and responsible AI use. With regard to media consumers, she believes it is essential to develop skills necessary to distinguish authentic from synthetic content, with a focus on photos and videos. It is also important to teach them how to use tools for verifying content authenticity.

Hakile Resulbegović highlights the importance of continuous investment in educating all those dealing with the challenges of AI in journalism. The introduction of AI into journalism requires strengthening digital and media literacy, both among journalists and citizens. In her opinion, educational programmes for journalists should include training on using AI tools, recognizing algorithmic biases, and analyzing synthetic content. On the other hand, the public should be empowered with critical thinking skills and tools to identify AI-generated content. She argues that it is especially important to teach citizens how to distinguish authentic news from manipulated information, with an emphasis on source verification and the use of verification platforms. She believes that it would be desirable to introduce digital literacy courses that include AI and its impact on the media into schools and universities, while journalistic organizations should develop manuals and guides to facilitate the ethical and responsible use of AI technologies.

III.8. AI and democracy: between potential and threat

AI can be both an adversary and an ally in the fight against disinformation, our interlocutors agree, and this depends on how it is used and whether, and to what extent, ethical, professional, and democratic principles are observed. Responding to the dilemma of whether AI is an adversary or ally in the fight against disinformation, Vukanović said that AI was a double-edged sword in information wars. This means, he explains, that AI is neither inherently adversarial nor inherently well-intentioned – it is a powerful tool whose consequences are determined by the ethical, regulatory, and technological frameworks in which it operates. The responsibility lies with journalists, policymakers, AI researchers, and media institutions to ensure that AI remains a force for truth rather than deception. "AI should be the guardian of truth, not the architect of illusion. Its role in journalism must be defined by integrity, vigilance, and an unwavering commitment to factual authenticity," says Vukanović.

Tanja Maksić:

> "If AI could somehow contribute to reversing these trends, then there is hope. If not, there is a fear that we are heading toward some kind of information chaos."

The use of AI in journalism can represent either a danger or a hope for the future of democracy – depending on how it is used, controlled, and regulated. While AI serves as a powerful ally in improving access to information, it can also be abused to spread disinformation and negatively impact crucial democratic processes in society. Since AI enables rapid and convincing generation of manipulative content, it is crucial to have regulation, oversight of tools, user education, and support for independent journalism based on professional standards in place. As an ally, AI can quickly identify fake news by analyzing patterns and data, helping in the analysis and dissemination of information. As an adversary, it facilitates the creation of convincing disinformation, such as deepfake videos. Ultimately, it depends on who is using these tools, says Vukanović. The proliferation of AI in journalism is neither an unquestionable blessing nor an inevitable threat, he adds, but a historic turning point that requires relentless vigilance, ethical management, and regulatory caution. The key to all this lies in responsible development and regulation. If AI tools are developed based on ethical principles and democratic values, and used in an informed and thoughtful manner, the risk of harmful consequences will be significantly lower. Still, given the current state, maintaining optimism is difficult, our interlocutors agree. What is certainly necessary is that the media in general, as well as each media outlet individually, have appropriate principles, rules, and protocols concerning the scope and limitations of AI tool usage.

The future of democracy is uncertain in so many respects, points out Tanja Maksić, one of the most important certainly being the media ecosystem. She is positive that the media, both as an industry and as a profession, are currently in a great crisis. Many people are leaving the profession, salaries

are not competitive, the industry is largely impoverished, and social networks have taken primacy as channels of information. Therefore, she believes that, if AI could somehow help reverse these trends, then there is hope. If not, there is fear that we are heading toward some kind of information chaos, or that quality journalism will survive but will not be accessible to everyone in the future – only to those willing to pay for it. Krivokapić shares this concern but also points to different regulatory responses to the risks of the technological era:

> "When we talk about democracy, we also talk about the state as a significant player, and then the question of regulation arises. On one hand, we can see Europe's strong efforts to strengthen state intervention in the information market. On the other hand, we see the current American policy, which vigorously tries to eliminate the interventionism demonstrated by Europe in the digital market and actually promotes completely different values, preferring freedom of information above any regulatory model."

Although he previously supported that second approach himself, Krivokapić is no longer sure it is the right one. He highlights as especially important the power imbalance between the media and huge corporations, which today control not only distribution but also the infrastructure for processing. "At the end of the day, all that is owned by someone else. You own nothing. You have created nothing of your own. You are just an end user, allowed to use it, more or less for free, to feed something out there and strengthen some giant, some Godzilla. But that's another story," he says.

Tanja Maksić emphasizes that AI can empower journalism and increase access to relevant and credible information, but if used manipulatively, it undermines trust, democracy, and media freedom. Ultimately, AI is a value-neutral tool: "Good media outlets will always adhere to the rules of the profession, bad ones will break them, regardless of the technology they use to produce content," she concludes. It remains for other stakeholders in this complex and delicate system, such as the state and international organizations and institutions, to find the right ways to respond to the challenges of the present moment, balancing, sometimes on a knife's edge, between security and freedom.

IV. INSTEAD OF CONCLUSION: ETHICAL GUIDELINES FOR THE USE OF AI IN JOURNALISM

The ethical guidelines before you have been formulated based on structured interviews with journalists and media experts, with the assistance of AI tools as well as human editing and proofreading. Although the spirit of the interviews has been largely preserved, there remains a concern that AI tools, even in the most sensitive areas of human activity and regulation – such as ethics – still display a surprisingly high level of "sensitivity" and suitability to the original intention and task they have been assigned.

IV.1. Transparency

Media content that is entirely generated using AI technology must be clearly labelled as such. The use of AI for translation without human editing and proofreading should also be labelled, while in cases where AI only assists with technical aspects, such as transcription, there is no obligation to label it.

IV.2. Human control and accountability

No AI-generated or -assisted content may be published without human review and approval. AI tools must serve solely as an auxiliary resource, not as a replacement for the professional work and judgment of journalists.

Journalists and editors bear full responsibility for the content they publish, regardless of the degree of AI involvement.

IV.3. Accuracy and verification of information

Content generated with AI assistance must undergo fact-checking, especially considering the possibility of so-called hallucinations or confabulations, i.e., inaccurate information produced by AI systems. AI must not be used for creating disinformation, defamation, or manipulative narratives.

IV.4. Use of AI in creating video content

Visual content (photographs, illustrations, videos, and animations) generated with the help of AI must be clearly labelled as such, especially if they could cause confusion.

Synthetic content must not contain elements that violate laws, undermine dignity, promote discrimination, or infringe on the right to privacy. When creating such content, elements should be carefully chosen to avoid the use of inappropriate symbols and inaccurate, incomplete, or inadequate representation.

Media must clearly distinguish between content that was actually recorded and content generated

or altered with the help of AI and label it accordingly, which is particularly important in the case of deepfake and similar technologies. It is essential for media outlets to develop internal policies regulating the design and distribution of such content, including the use of specific labels and metadata indicating the AI origin of visual material.

IV.5. Preserving integrity and editorial autonomy

Journalistic work must remain based on human interpretation, critical thinking, and ethical responsibility.

Decisions about which news will be published, how it will be shaped, and how it will be distributed must remain in the hands of the editorial team.

IV.6. Prevention of homogenization and preservation of pluralism

AI tools must not contribute to the uniformity of content. Journalists must strive for diversity of sources and perspectives.

Editorial teams should nurture the authenticity of journalistic expression and avoid automated recycling or so-called copy-paste dissemination of information.

IV.7. Observance of copyright and intellectual property

Using someone else's work in AI-generated material without permission or source attribution is unacceptable. When using AI to generate content, copyright, sources, and licensing must be taken into account.

IV.8. Protection of privacy and dignity

AI must not be used to produce content that violates privacy and dignity or incites violence.

Particular attention must be paid to protecting vulnerable groups (gender, racial, sexual, class, ethnic, political, ideological, etc.).

IV.9. Training and digital literacy

Journalists and editors must receive continuous training on the potentials, limitations, and ethical aspects of AI tools. Newsrooms are obliged to invest in employee education and establish internal rules for the responsible use of AI.

IV.10. AI in journalism and democratic principles

AI tools in journalism must serve the truth, public interest, and democratic values. Media must not allow AI to be used as a means to control narratives, manipulate, or suppress freedom of expression.

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