

Special Section: Media Capture in the Western Balkans and Beyond
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Media Capture Through Foreign Agent Laws: The Cases of Russia, Hungary, Georgia and Bosnia and Herzegovina

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Abstract: Based on evidence from four country contexts, the paper aims to show how a remedy to media capture—foreign support and philanthropy—has triggered increased governmental pressure and led to new forms of media capture. It also examines how independent media outlets are coping with this situation. The paper begins with the premise that the current market is unable to provide viable business models for independent media and thus protect outlets from capture. For some time, foreign support for the media served as a remedy, compensating for lost revenues. In fact, media support has long existed in the form of grants, philanthropy, training, and certain forms of public diplomacy. Recently, however, the increased importance of media support has led to retaliation by governments, now focused directly on donors and grant recipients. The paper defines the disadvantages and potential risks of media support for independent media in pressured environments. It also provides a theoretical explanation of the conditions that determine when a media organisation is willing to accept risk.

Keywords: media capture, foreign agent laws, grant funding, illiberalism, authoritarianism, media market

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Introduction

Despite their role in providing public service and acting as a check on the government, news media are traditionally seen as businesses that sell information and entertainment to audiences. This perception leaves independent media vulnerable in the 21st century, allowing illiberal and authoritarian governments to pressure them without resorting to outright human rights violations. Following the market reforms of the 1990s in Eastern Europe and the former Soviet Union, as in most of the world, the largest news media brands relied on the market for revenue. However, the majority of this revenue did not come from readers, viewers, or listeners but from advertisers hoping to capture their attention. For many years, advertising functioned as a subsidy, keeping costs low for consumers of news (Argentesi & Filistrucchi, 2007). Changes in the media market that began in the late 1990s, including the emergence of the Internet and new advertising services, ended this situation. Many newsrooms then began to struggle to survive. This structural vulnerability allowed political interests to pressure the media through “cruel markets” (Scheppelle, 2018), meaning that the deficiencies of a broken business model were used to control media outlets without making state involvement obvious to most observers. Pickard (2020) identified the source of this vulnerability as the “market ontology” of the media:

[We] treat the market’s effects on journalism—as we treat the market’s effects on nearly everything—as an inevitable force of nature beyond our control or, at the very least, a public expression of democratic desires (p. 175).

An emerging strand of journalism studies literature refers to interferences by interest groups in media markets as “media capture” (Mungiu-Pippidi, 2013; Schifffrin, 2018). Besley and Prat (2006) refer to media capture as a “combination of formal press freedom and substantial political influence” (p. 720), while Mungiu-Pippidi (2013) has described it as a situation in which media have “not succeeded in becoming autonomous and manifesting a will of their own, nor able to exercise their main function, notably of informing people” (p. 41). The main interests interfering with newsroom work are businesses and governments. However, scholars have also added factors such as dependency on advertisements (Herman & Chomsky, 2002) and digital platforms (Bell, 2021) to the list. While the market can capture the media primarily through ownership and dependency on advertisements, the government can do so through state subsidies, debt bailouts, preferential distribution of state advertising, and tax breaks for owners (Mungiu-Pippidi, 2013), as well as through market disruption measures (Dragomir, 2018).

Against this backdrop, a number of scholars (McChesney, 2011; Murschetz, 2013; Rusbridger, 2020) have highlighted the importance of providing subsidies for news media. Moreover, an emerging body of literature on donor-funded newsrooms has examined foundations as alternative revenue sources for news outlets (Benson, 2018; Scott et al., 2019). In the 2010s and 2020s, grants from foundations or governments were seen as an inevitable source of funding for journalistic content

neglected by the market. Examples include reporting on international development (Bunce, 2016; Schiffrin, 2017) and investigative journalism (Nisbet et al., 2018). While donor funding aims to help newsrooms withstand media capture, it also provokes new responses from authoritarian states that target specifically donors and recipients. These reactionary pressures aim to limit the availability of foreign funding to newsrooms or harm those that receive it.

This research focuses on the news media environment in four post-communist contexts—Russia, Hungary, Georgia and Republika Srpska, one of the entities of Bosnia and Herzegovina—where governments have introduced repressive laws targeting civil society and news media outlets considered recipients of foreign support or closely aligned with Western interests. In the case of Republika Srpska, rather than Bosnia and Herzegovina as a whole, this focus is justified by the scope of the law, which applies only on this administrative entity. As such, the source of pressure in this case is the leadership and administration of a subnational entity rather than the state. Building on the aforementioned economic weaknesses of media outlets, foreign agent laws introduced in these contexts can be considered part of the toolkit used to capture the media. Thus, while the media may remain formally independent, its ability to act autonomously is limited. The paper asks the following questions: How is the impact of international support measures perceived by journalists? What actions do authoritarian governments take to interfere with the use of foreign support? How do newsrooms react to these actions? How does the country context determine the opportunities available to journalists? We explore these questions using a political economy framework. This subfield of media studies examines the structural conditions that determine how media operate, including ownership, state pressure, and media capture, and how these factors influence the media's potential to act as a watchdog of democracy. The theory builds on literature about the political economy of media, specifically the subset describing media capture. The comparison is contextualised by scholarly discourse about democratic decline, especially the work of Levitsky and Way (2010) about competitive authoritarian systems.

Contexts and country differences in the relationship between media and politics

Mungiu-Pippidi (2013) argued that countries with “lighter versions of communism” were more likely to develop a robust media market because they experienced less state interference when establishing a new media system in the 1990s (p. 42). However, literature on media capture shows that media capture causes problems for media pluralism even in Central European countries that joined the European Union, such as the Czech Republic (Vojtěchovská, 2017), Slovakia (Štětka, 2015), Hungary (Dragomir, 2018; Bátorfy & Urbán, 2020), and Slovenia (Milosavljević & Poler, 2018). Russia, Hungary, Georgia, and the confederal entity Republika Srpska examined in our study are so-called third-wave democracies, where democratisation only started after 1989 and whose status as liberal democracies has been contested by

numerous political scientists in the past two decades. During the course of democratization and opening up, they have:

[...] borrowed many features from an ideal ‘Western’ model, including abolition of censorship, freedom of press concepts and related legislation, privatization of media, a shift to more objective reporting, and increasing control by journalists and editorial boards over news production (Vartanova, 2012, p. 121).

They have all strengthened their ties to the West. All of them became members of the Council of Europe, and Hungary went on to join NATO and the European Union. Although the processes were similar, the degree of openness varied greatly—with Russia and Hungary at opposite ends of the spectrum. While Hungary was praised for its reform activities in the 1990s and 2000s, Russia was viewed with concern. Despite President Boris Yeltsin’s pro-Western gestures, the country’s weak economy and waves of political turmoil created challenges for those hoping for swift democratisation. In the early years, Jakubowicz (2001) described the key difference between Hungary’s and Russia’s political and media development, pointing out that Hungary’s “media war” in the 1990s took place strictly in accordance with the law (pp. 69-70). In this case, constitutional and legal interpretations played an important role in legitimising a given actor’s steps. Russian law, on the other hand, had far less authority because it was “under pressure from lawlessness” (Jakubowicz, 2001, p. 70).

Given the trend of democratic backsliding, all four of the assessed political systems can be considered what Carothers (2002) described as “dominant-power politics” or “feckless pluralism” (at least during the time of the interviews), meaning that they had an existing political space, an opposition that participated in elections, and democratic institutions; however, one political grouping dominated the system. Levitsky and Way (2010) would categorize Hungary in the 2010s as a competitive authoritarian system, where the opposition has a chance of winning. In contrast, Russia in the 2010s was an electoral authoritarian system, where elections do not allow for real competition. For example, contenders who promised substantial change were often disqualified from running. Since 2006, Republika Srpska has been ruled without interruption by the Alliance of Independent Social Democrats (SNSD). This has enabled the party’s leader, Milorad Dodik, to establish a strongly personalised political culture that is “openly antagonistic, pro-Russian, and anti-democratic” (Smolo-Zukan, 2025, para. 1). In Georgia, the Georgian Dream party has been in power since 2012, turning increasingly authoritarian over the years. Following the 2024 national elections, international observers raised doubts about electoral integrity, citing numerous cases of intimidation, pressure, and potential fraud (Congressional Research Service, 2024).

In their structuralist analysis, Levitsky and Way (2010) focus on long-term historical factors that form a state’s linkages and leverage and thereby determine its trajectory. According to these authors, leverage refers to a government’s bargaining power toward the West and its vulnerability to sanctions and other forms of pressure—the

higher the leverage, the more influence the West has over the country. Linkage refers to a country's density of ties to the West or its embeddedness in the Western framework—the higher the density, the higher the linkage. In countries with lower linkage and leverage, the state has more opportunities to exert pressure (Levitsky & Way, 2010).

Examining this conceptual framework, one could argue that Russia is a low-linkage, low-leverage country, while Hungary is the opposite: high-linkage and high-leverage. Russia is a country of 140 million, a regional power and one of the world's largest oil and gas exporters. It can relatively easily withstand economic pressures from abroad, as demonstrated by the sanctions' regime following the occupation of Crimea in 2014. Hungary, on the other hand, is a country of 10 million people inside the EU. Its economy depends on the activities of German and other Western European manufacturers. The literature reiterates this point: Levitsky and Way (2010) point out that Russia's size, gas reserves, and nuclear warheads effectively contribute to its “authoritarian stability” (p. 187). However, Bozóki and Hegedűs (2018) refer to Hungary as an “externally constrained hybrid regime” due to its embeddedness in an alliance of democratic states. This makes it harder for Hungary to eliminate its democratic institutions and checks and balances. Republika Srpska and Georgia are both low-linkage, high-leverage contexts. According to Bosnia and Herzegovina's constitution, the country is made up of two administrative and territorial units: Republika Srpska and the Federation of Bosnia and Herzegovina. Milorad Dodik, president of Republika Srpska, has spoken out several times in favour of a “peaceful separation” from the Federation of Bosnia and Herzegovina (Turčilo, 2024)—thus positioning the entity in opposition to Bosnia and Herzegovina's status as an EU candidate. With slightly more than one million inhabitants, the small, relatively weak entity depends on the support of stronger countries. However, its government prioritises alliances with authoritarian and illiberal governments, thereby limiting the potential influence of Western democracies. Georgia is a country of fewer than four million people. Although it is on the path to EU candidacy, the Georgian Dream government has introduced restrictive laws and taken a stance increasingly favourable to Russia, its far larger neighbour with which it has already experienced conflicts in recent years.

The pressure that the respective governments put on foreign donors is an example of a state measure with a similar intent that plays out differently according to the country's situation. Commentators view many repressive policies in Republika Srpska, Georgia, and Hungary as influenced by Russia. Russia's so-called “foreign agent law”, officially titled “On Amendments to Legislative Acts of the Russian Federation Regarding the Regulation of the Activities of Non-Profit Organisations Performing the Functions of a Foreign Agent”, was enacted in 2012. It requires all non-profit organisations that receive foreign donations and engage in “political activity” to register as foreign agents. The 2015, so-called “Undesirable Organisations Law” gave prosecutors the power to declare international NGOs “undesirable,” forcing them to cease operations in the Russian Federation. A 2017 follow-up to the foreign

agent law extended the registration requirement to foreign-operated news agencies. Inspired by the Russian precedent, in 2017, Hungary passed the “Law on Transparency of Organisations Funded from Abroad” (Act LXXVI of 2017), which requires all associations and foundations to report to a court that they are “organisations funded from abroad” if their foreign donations are considered significant. Another law passed in 2023 created a new authority with the alleged aim of monitoring foreign influence over civil society and the media. The 2024 Georgian Law on Transparency of Foreign Influence requires recipients of foreign support to register as “organisations pursuing the interests of foreign powers”, and additional Georgian laws impose fines on grant recipients. In Republika Srpska, the Law on the Special Registry and Transparency of the Work of Nonprofit Organisations from 2025 aimed to establish a registry of foreign grant recipients, but did not enter into force.

Methodological framework

Building on my dissertation research (Bleyer-Simon, 2022), I will assess the use of restrictive laws targeting recipients of foreign funding and donors operating in these countries—and a subnational entity with competencies resembling a state—as a form of media capture. I will examine how foreign agent laws have unfolded in different geographic contexts. However, since the relevant laws were passed at different times, the periods in which the assessments are made differ. The Russian and Hungarian laws date back to the 2010s. In contrast, in Georgia and Republika Srpska, authorities began targeting media actors in the 2020s by labelling them “foreign agents”. While repression in Russia reached a point in the 2020s when independent journalism became nearly impossible, Hungary’s initial foreign agent law was repealed. However, new pressures emerged in 2023, warranting two case studies of the country.

In the initial phase, I conducted 53 in-depth interviews in Russia and Hungary between 2017 and 2019. They lasted an average of 86 minutes. The semi-structured interviews were guided by a predefined set of questions that I adapted according to the situation and time constraints. In the second phase, I conducted 18 follow-up interviews with seven Hungarian, eight Georgian, and three Republika Srpska-based journalists and NGO representatives in 2025 and 2026. These interviews averaged 40 minutes. In addition to speaking with newsroom representatives, I also spoke with representatives of donor organisations, researchers, and experts familiar with the region. I also attended several meetings of journalists and the media development community where such topics were discussed. I supplemented the second-stage interviews with incident reports from the Mapping Media Freedom project of the European Centre for Press and Media Freedom. In Georgia, 292 incidents against journalists were reported between 1 January 2024 and 15 March 2026 (MAPMF, n.d.). These incidents included assaults on independent journalists, smear campaigns by the government and its loyalists, and government capture of

public service media. During the same period, 119 cases were reported in Hungary and 45 in Bosnia and Herzegovina (MAPMF, n.d.).

Due to the often dangerous and life-threatening situations in which these journalists work, interviewees remain anonymous and are referred to using “they” and “them” to avoid identification. Most interviewees did not request anonymity, but they spoke more freely when they knew their name would not be associated with their quote. I approached the interviews first through open coding, developing initial conceptions and identifying possible in vivo codes before categorising the data. During the interviews, I looked for substantive categories that would help me determine financial viability, possible and already manifested pressures, and alternative financing methods that could help the journalists overcome economic problems and withstand state pressure.

Foreign agent laws in different geographic contexts

Russian Federation, 2017-2020

Given Russia’s vast geographic area, its media market is large. Despite its various ethnic and linguistic minorities, Russian is the main language used. This allowed many media outlets to rely on advertising to support their operations. Nevertheless, smaller, independent media were unable to access the market and relied on support from Western governments or philanthropic organisations. When asked about past experiences with philanthropy, interviewees mentioned that grants from donors associated with US financier George Soros, primarily the Open Society Institute and later the Open Society Foundations, were relatively easy to obtain and could be used for content creation or core operating costs. Some grant recipients added that they did not have to actively seek grants because donors familiar with the quality of their work proactively approached them.

Due to government measures targeting foreign funding in the 2010s, most interviewees had tried to distance themselves from many previously active donors by the time of our interviews. By 2018, three major measures impacted foreign funding in the media, affecting both the demand and supply sides: the laws on foreign agents, undesirable organisations, and foreign media ownership.

The internationally most well-known measure was the foreign agent law,¹ which required non-profit organisations engaged in “political activity” and receiving funding from abroad (or from foreign citizens or stateless entities) to register as “foreign agents”. Registered organisations were subject to extensive reporting requirements, which were considered both as costly and time-consuming, and were required to

¹ The law was amended several times in subsequent years to extend the scope of entities that could be targeted. For this reason, the press often refers to the passing of a new law each time new entities are targeted. In this text, however, I refer to the foreign agent law in singular.

add a disclaimer to all their communications stating that the publisher of the material was a “foreign agent”—a term intended to invoke the connotations of a spy and thereby damage their reputation. Organisations that continued to accept money from abroad without registering were subject to fines and closure.

Although the government justified the law as a necessary intrusion to safeguard transparency and national security (Prince, 2021), between 2013 and 2018, 66 cases were submitted to the European Court of Human Rights (ECtHR) challenging the legislation (Wiersma, 2019). While activists were confident that the ECtHR would eventually rule against the foreign agent law, this would not necessarily have provided a remedy for affected organisations, as the Russian government repeatedly disregarded such rulings in the 2010s (Madsen et al., 2018, p. 210).

The first media-related entities affected were Russia-based media support organisations. The Sreda Foundation ceased operations in 2015 after being declared a foreign agent, as did the Free Press Support Foundation, the Institute for Regional Press, and the Press Development Institute – Siberia (Human Rights Watch, 2018a). Initially, the foreign agent laws did not explicitly target privately owned Russian media outlets; only foreign-operated outlets, such as Radio Free Europe and Radio Liberty, were included in the registry in 2017. However, some media outlets feared that the ambiguous wording of the original law could subject them to similar sanctions, even though it was originally aimed at non-governmental organisations. For example, many interviewees mentioned that, although the law formally applied only to organisations involved in “political activity”, the registry of foreign agents included apolitical organisations, such as NGOs focusing on the environment or nature conservation.

On 25 October 2018, a Moscow court fined the magazine *The New Times* 22.25 million roubles (equivalent to its yearly revenues) in relation to the foreign agent law. The magazine had accepted money from its own foundation, the Fund in Support of Freedom of the Press, which had been designated a foreign agent in 2014 (Human Rights Watch, 2018b). This did not mean that the newsroom itself was declared a “foreign agent”; rather, it was fined for accepting money from a foreign agent. At the time of the interviews, the interviewees did not know how to interpret this development. This highlights the absence of an essential safeguard for legitimate laws: foreseeability.

The first “foreign agent law” was followed by amendments in subsequent years, including the 2015 law on “undesirable organisations,” which allowed prosecutors to shut down philanthropic organisations. This law effectively eliminated many foreign funding sources available to media outlets. Russian citizens who continue to cooperate with such organisations in any way (e.g., accepting money from their foreign offices) face up to six years in prison.

The Russian experience shows that passing a restrictive law does not always set clear boundaries for those targeted. In the case of foreign support for the media, two laws targeted the supply of foreign funding: limits on ownership and a list of undesirable organisations. These measures were clear in their framing and impact. They caused foreign owners, who guaranteed the political independence and possibly covered temporary losses of renowned outlets, to leave the Russian market. For newsrooms, these measures meant that these funding sources were no longer available.

Conversely, the foreign agent law, which focused mainly on the demand side, had a more ambiguous impact. The first media-related casualties were foundations that acted as intermediaries. They accepted money from abroad and used it to support the Russian press. At the time of the interviews, the text of the foreign agent law did not explicitly mention foreign philanthropic support for media outlets. This was reiterated by the editor-in-chief of a small start-up specialising in human rights issues. They saw the problem as lying more in the availability of foreign grants than in the possible repercussions for those accepting them. “Relying on grants is not a big problem. But Europe is not giving a lot of money and is cutting programmes” (anonymous personal communication, 2018), they said.

Russian interviewees pointed out that the legislation used vague formulations and open-ended provisions that tended to reduce legal certainty. Thus, they did not clearly understand who could be affected by the foreign agent law or what the implications would be if a newsroom were found to be in violation of it. Interviewees highlighted that the authorities could target them without proper justification and listed several factors that they perceived as limiting the efficacy of the foreign agent law or other similar measures: 1) the Russian authorities’ perceived incompetence in effectively enforcing laws and regulations; 2) reliance on other effective measures to influence the media or distort the working environment of independent outlets; and 3) the government’s interest in the survival of independent media as a source of international legitimacy.

Despite being mentioned as a possible threat, most interviewees did not consider smear campaigns related to the use of foreign grants to be a significant problem affecting their reputation among potential audiences. Only for-profit media that relied mainly on advertising as a source of revenue were reluctant to apply for grants because, according to one interviewee, “advertisers don't want to work with foreign agents”. Investigative and other small media outlets that were not considered attractive to advertisers believed they had nothing to lose by relying on foreign support. In fact, complying with the law would bankrupt them faster than violating it.

To protect themselves against a potential increase in pressure, some newsrooms suggested coping strategies that could help them avoid harassment by the authorities and, in some cases, enable them to use grants with limited risk. These solutions fell into two main categories: compliance and exit. Compliance could be divided into two subcategories. For some outlets, compliance meant adhering to the letter of the

law; for others, it meant avoiding risky topics. Exit involved registering a media outlet abroad under a different jurisdiction while keeping journalists in the country to report on the situation. Outlets operating abroad could not be formally investigated for accepting foreign support; however, their websites could be blocked, and individual journalists working in Russia could be prosecuted. This occurred following the interview process. In 2019, one of Meduza's Russia-based employees, investigative journalist Ivan Golunov, was arrested on fabricated drug charges (Lombardo, 2019). Moreover, some exited interviewees mentioned that donors on the list of undesirable organisations were still hesitant to support them, despite not being Russia-based outlets in the legal sense, arguing that the money would endanger journalists working in Russia.

The newsrooms' ability to cope—at least to some extent—with foreign agent laws was temporary. During the Covid pandemic, pressure on journalists increased, and a number of outlets were fined. Foreign agent laws were extended so that individuals could also be designated. Between April and September 2020, ten news outlets, including the investigative websites *iStories* and *The Insider* and the popular online news television channel *Dozhd*, as well as twenty individual journalists, were declared foreign agents (Yaffa, 2021).

Following Russia's full-scale invasion of Ukraine in February 2022, independent journalism became impossible in Russia. "All institutional journalism was forced into exile" (Yablokov & Gatov, 2025, p. 1). In this context, reliance on foreign grants has grown; however, journalists are no longer able to conduct journalism on the ground (Yablokov & Gatov, 2025).

Hungary, 2018-2019

In the early 2010s, using foreign grants to support media outlets became commonplace. The economic crisis, the ongoing weakness of traditional media revenues, repressive policies, and the political takeover of privately owned media outlets by allies of the Orbán government left independent news media increasingly vulnerable to various forms of pressure (Bleyer-Simon et al., 2025). Bátorfy and Urbán (2020) showed that government-aligned news outlets relied on state advertising as their main source of revenue, whereas outlets publishing critical investigations into the government did not have access to this source. To some extent, grants were seen as a replacement for foreign ownership as journalists remembered German, Finnish, and other Western companies—many of which left the market after the economic crisis of the late 2000s—as a shelter from government interference in newsroom work. During this period, philanthropic support emerged as a new source of revenue independent of local interest groups. The wealth of information available about donors reveals significant differences between Russia and Hungary, where donors could operate more freely in a high-linkage, high-leverage context.

Nevertheless, parallels with Russia were often drawn in Hungarian discourse when assessing attacks on democracy, the state of civil society, and the independent media. This is evident in the government's anti-donor measures, particularly the 2017 "Law on the Transparency of Organisations Supported from Abroad" (also known as the NGO Law), which is considered to be influenced by the Russian foreign agent law (see CSCE, 2020; Human Rights Watch, 2017). The 2017 law introduced new obligations for non-governmental organisations (NGOs) that received more than 7.2 million Hungarian forints (HUF) a year (approximately €25,000 at the time) from foreign sources annually. These NGOs were required to register and use the label "organisations supported from abroad" in all their publications, websites, and press materials. They were also required to provide the government with detailed reports on their foreign funding. Under the law, organisations that failed to comply faced financial penalties (European Commission, 2017). Like its Russian counterpart, the law was justified by the need for transparency, but it was considered too intrusive to qualify as pursuing a legitimate aim. The only media-related organisation on the list was the Center for Independent Journalism, which provided training programmes and small grants for journalists. For-profit news media were not subject to this regulation, but some non-profit organisations were unsure whether they would be required to register. Unlike in Russia, however, most news outlets did not expect the law to target for-profit media in the future. Moreover, the law was repealed after the Court of Justice of the European Union (CJEU) ruled that it breached EU law (Hungarian Helsinki Committee, 2020; Hungarian Helsinki Committee, 2021).

At the same time, the Hungarian government targeted donors directly through legal and political pressure. In 2014, authorities launched a legal investigation into the administrators and beneficiaries of the EEA Norway Grants' civil society fund. At one point, Hungarian authorities raided the office of Ökotárs, a foundation responsible for distributing this funding. Government representatives referred to suspicions of tax evasion but also highlighted that the fund's beneficiaries were predominantly organisations that criticised the state (Bodoky, 2024).

Organisations associated with the Hungarian-born, U.S.-based philanthropist George Soros were targeted most often, and the government orchestrated a large-scale smear campaign against him (The Guardian, 2018). Bowing to the pressure, Soros's grant-making organisation, the Open Society Foundations (OSF), relocated to Germany. Unlike in Russia, however, leaving the country did not mean that the organisation had to stop its philanthropic activities there. As the organisation stated, "Open Society will continue to support the important work of civil society groups in Hungary on issues such as arts and culture, media freedom, transparency, and education and health care for all Hungarians" (OSF, 2018, para. 2).

In the interviews, smear campaigns against recipients of foreign grants, especially those associated with Soros, were mentioned more often than hard measures. Independent newsrooms and journalists were among the groups portrayed as agents of foreign interests, along with academics and activists. Although concerns were

voiced, newsroom representatives did not see a connection between their association with foreign donors and how audiences or sources would relate to them. None of the interviewees who had previously received grants said they would give them up, including those who had been subjected to smear campaigns. Still, many emphasised that grants were only one part of their income and that they hoped to decrease their reliance on them. Newsrooms aimed to generate more audience revenue because this would signal that their content met people's demands and that audiences saw value in it.

Hungary, 2024-2026

In a further development, the Hungarian Parliament passed the Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty) in late 2023. The Act amended electoral, criminal, and other laws under the pretext of prohibiting foreign interference in electoral campaigns. It established the Sovereignty Protection Office, whose measures targeted not only electoral campaign funding but also journalists (Venice Commission, 2024). The Office's task was to identify recipients of foreign funding that might undermine state interests, label them, and recommend that the authorities launch criminal or administrative investigations (Bleyer-Simon et al., 2024). However, the law did not provide for sanctions and was subject to an infringement proceeding before the European Court of Justice (Case C-829/24).

In May 2025, members of the governing party submitted another bill titled "Transparency of Public Life," which would have granted the Sovereignty Protection Office the power to advise the government on creating a registry of entities deemed to endangering the country's sovereignty. Entities on this registry would only have been able to accept grants with a permit from the National Tax Authority. Furthermore, they would have lost access to 1% redirected income tax donations, through which the independent media outlets *Telex* and *Partizán* received more than €1 million support in 2025 (Uitz, 2025). As a precautionary measure, one interviewee mentioned that their outlet was planning to establish a company in another EU member state if the situation worsened. To become 100% Hungarian-owned, the publisher of *444.hu* decided to buy out the share of its foreign part-owner, the Media Development Investment Fund (444.hu, 2025). However, a few months after the bill was announced, it was postponed indefinitely without explanation.

At the time of the interviews, respondents saw the Sovereignty Protection Act primarily as a means of contributing to smear campaigns against grant recipients through reports that reiterated longstanding conspiracy theories without strong factual bases. Interviewees therefore said they were not changing the way they operate. "I don't want to play by their rules," said a Hungarian journalist in a management position at their outlet (anonymous personal communication, 2026). Nevertheless, the smear campaigns had a noticeable chilling effect, particularly after the Hungarian Constitutional Protection Office launched a national security probe into the

independent outlet *Magyar Hang*. The Office subjected three *Magyar Hang* employees to lie detector tests after claiming that a reporting error, for which the outlet apologised a few hours after publication, had the “potential to endanger Hungary’s security” (Magyar Hang, 2024).

Compared with interviews conducted seven years earlier, Hungarian journalists showed signs of fatigue. As one interviewee put it, “We [Hungarian independent journalists] have become too cautious due to the smear campaigns” (anonymous personal communication, 2026). The extent to which this trend may have affected independent Hungarian journalism could not be assessed at the time, as the interviews preceded the change in government in 2026, that brought an end to the pressures described above.

Georgia, 2024-2026

Over the past few decades, Georgian independent media outlets have been “totally dependent on foreign grants,” according to one interviewee. In their case, this meant that more than 80% of their revenues came from foreign sources at times. According to the interviewees, the overwhelming majority of their revenues used to come from grants, as access to advertising was difficult for outlets critical of the government while reader-driven revenues were barely part of the discussion. This point was also reiterated in a report on adapting business models to the new environment in Georgia (Apakdize, 2026). For example, the co-founder of *OC Media* explained in an article that his outlet started looking for alternatives to grants in the late 2010s. Only then did he learn about audience-driven revenues used by outlets in Western Europe. “It was the first time we realised that media outlets need to devote a significant amount of time to communicating with their readers, which was completely new for us”, he said (Apakdize, 2026). For many years, applying for grants was considered ordinary practice. “What was normal for 30 years has suddenly become a crime,” said one interviewee (anonymous personal communication, 2026).

After a bill was withdrawn in 2023 following international criticism and multiple protests, the Georgian Parliament adopted the Transparency of Foreign Influence law in May 2024. The law requires media outlets and NGOs that receive income from abroad to be labelled as “organisations pursuing the interests of foreign powers” and grants the Ministry of Justice the authority to conduct “thorough investigations” based on limited evidence. The Parliament overrode the president’s veto of the law (Mapping Media Freedom [MAPMF], 2024a). In 2025, the governing party adopted a rewritten version of the United States’ Foreign Agents Registration Act (FARA) and amendments to the Law on Broadcasting. The former requires entities to register as “foreign agents” if they act “at the authority, request, order, or control of a foreign principal” and imposes fines for failing to do so. The latter completely prohibits foreign revenues for broadcasters (MAPMF, 2025a). The 2025 amendments to Georgia’s Law on Grants require foreign donors to Georgian organisations to obtain prior approval from the Georgian government or a designated body before

issuing grants to Georgian citizens or entities. If a grant is provided without the government's consent, the Anti-Corruption Bureau, the body responsible for enforcing the law, can impose a fine equal to twice the amount received by the grant recipient (International Center for Not-for-Profit Law [ICNL], 2025). These restrictive laws are justified by the need to safeguard the country's sovereignty. To provide a layer of legitimacy, members of the governing party referred to Western examples; for instance, they modelled the laws after British (MAPMF, 2025b) and US laws (ICNL, 2025).

Initial attempts to introduce these measures were not taken seriously. Civil society felt somewhat protected by the country's declared path toward EU integration and the numerous protests in support of civil society and independent media. "The first law didn't work; nobody registered", summarised one interviewee (anonymous personal communication, 2026). However, by 2024, the government's authoritarian inclinations had become clearer. The European Union halted the country's accession process to the bloc and froze financial support to state institutions (Megrelidze & Cook, 2024). A "fundamentally flawed" (IRI, 2024, para. 2) election enabled the Georgian Dream party to establish a quasi-one-party state. Numerous repressive laws were passed, and the country shifted its international allegiances from liberal democracies to states governed by illiberal and authoritarian governments (Samkharadze, 2025). Thus, the same interviewee who, in 2023, had been willing to accept the risks associated with international grants saw a clear and present threat from the government following the 2024 election. "We stopped all grant agreements with foreign donors" (anonymous personal communication, 2026), they said of their own organisation. Moreover, the situation was still developing at the time of the interviews, adding a further layer of unpredictability. On January 28, 2026, amendments were proposed to the Law on Grants, the Criminal Code, the Code of Administrative Offences, and the Law on Political Associations of Citizens. The amendments would broaden the scope of what is considered a "foreign grant", including a much wider range of transactions originating from abroad that could fund activities related to politics or public policy. The amendment to the Criminal Code introduced an "aggravating circumstance" related to "money laundering concerning Georgia's internal political affairs", which could result in a prison sentence of up to 12 years (MAPMF, 2026b).

Soon after the laws were passed, potential recipients of foreign grants were targeted by the authorities. On August 15, 2025, six NGOs announced in a joint statement that they had received inspection letters from the Anti-Corruption Bureau under the Foreign Agents Registration Act (FARA), asking why they had "failed to register as agents" (MAPMF, 2025c). Four of these organisations worked on media freedom issues. Later that year, the Bureau launched an investigation into 60 independent media outlets and civil society organisations (OCCRP, 2025). The outlet *Tabula* lost a GBP 50,000 (€57,000) grant from the UK government because the donor had tried to obtain approval from the Georgian government for its ongoing grant

programmes in the country but could not reach an agreement with the Georgian authorities (CMIS, 2025).

Interviewees identified the imprisonment of Mzia Amaglobeli, co-founder and director of the independent media outlets *Batumelebi* and *Netgazeti*, as the most worrying development affecting the independent media. She was charged with allegedly attacking a police officer. Although representatives of civil society and the media believed that slapping a police officer would normally result only in a small fine, she was sentenced to two years in prison. Interviewees saw the case against Amaglobeli as politically motivated and a clear signal that the government is willing to use out-right repression against democracy watchdogs.

Interviewees said that the impact of the laws was clearly felt, especially among local media outlets. Several independent broadcasters ceased operations in 2025, and most regional broadcasters stopped producing daily news segments. Many outlets laid off workers and consequently lost the capacity to report on political developments with the same intensity as before (Green, 2025). Still, there were indications that some outlets opted to continue relying on donor financing to support their operations. Georgia's media regulatory authority, the Communications Commission, issued a written warning to the independent community radio station *Radio Marneuli* for accepting a grant of 32,542 GEL (EUR 10,000) from the National Endowment for Democracy. The year before, the outlet had received warnings related to a grant from Deutsche Welle (MAPMF, 2026a). Previously, *Radio-TV Nori*, *Systema Gamma*, *TV Formula*, and *Formula Multimedia* had also received warnings for relying on foreign funding (MAPMF, 2025d).

Potential loopholes in the laws were identified that would allow outlets to formally change their relationship with foreign donors from philanthropic to commercial. Some considered registering their outlets in EU member states. However, these approaches had weaknesses. Donors were slow to adapt to the changing reality. Leaving the country, even just formally, would make it appear that the outlets were fleeing, which was unacceptable to many. Additionally, outlets that moved abroad experienced smear campaigns that could damage their reputations. Many interviewees therefore had high hopes for developing new reader revenues, especially through the *Sinatle.Media* project, which brings together 22 online media outlets for shared fundraising.

Republika Srpska (Bosnia and Herzegovina), 2024-2026

In Republika Srpska, interviewees argued that independent media could only have survived in previous decades because of foreign grants. Foreign donors were seen as guarantors of independence. One interviewee said, "I have been a journalist for 20 years or more, and I can say that [donors] have never told us what or how to report" (anonymous personal communication, 2026). Another interviewee mentioned that, despite not influencing recipients' work, hostility toward foreign funders had been

commonplace in the subnational entity since the 1990s. The governing party had multiple times expressed intentions to introduce laws targeting grant recipients over the previous decade.

Independent media outlets operated online as portals and were registered as non-profit organisations. Thus, it was clear that the Law on the Special Registry and Transparency of the Work of Nonprofit Organisations, proposed on 3 April 2024, and adopted on 27 February 2025, would apply to them. The law aimed to create a special registry of non-governmental organisations in Republika Srpska that received foreign grants and donations and to designate them as “agents of foreign influence” (Turčilo, 2025; European Center for Not-for-Profit Law [ECNL], 2024). As in other contexts, interviewees viewed this law as a potential source of time-consuming and costly administrative procedures, as well as justification for smear campaigns against civil society and the media.

When the law was announced, journalists believed it would significantly alter their working conditions. According to the interviewees, the most common responses were either to express an intent to leave journalism or to reaffirm their commitment to it, even expressing a willingness to go to prison. Stopping work with foreign donors was never considered an option, as, according to the interviews, alternative funding sources could not be found in the foreseeable future. Instead, journalists considered establishing for-profit companies or moving their place of registration to the Federation of Bosnia and Herzegovina. However, they also mentioned that these mitigation measures would have little long-term impact if the government took the law seriously. The government could easily pass a new law targeting for-profit media or declare that the law applied to everyone working in Republika Srpska, no matter where their outlet was registered.

An initial draft law from 2023 was withdrawn from the political agenda following consultations with the Government of Republika Srpska and members of the ruling majority in the National Assembly, according to the President (MAPMF, 2024b). The law was criticised by the Council of Europe (CoE), as well as by EU and member state institutions (Council of Europe [CoE], 2025; European External Action Service [EEAS], 2023). On 29 May 2025, the Constitutional Court of Bosnia and Herzegovina ruled that certain provisions of the 2025 law were incompatible with the Constitution of Bosnia and Herzegovina and the European Convention on Human Rights (CoE, 2025). The law was repealed later that year. However, according to interviewees, this was not due to EU criticism or the Constitutional Court's decision. Decisions of federal state courts were not considered applicable in Republika Srpska following a set of laws signed by the president (N1 Sarajevo, 2026). Rather, the appeal was attributed to domestic political reasons.

Interviewees believed that enforcing the law would have been too complicated for the state. They therefore considered its main purpose to label civil society organisations. Indeed, although no registry was established, the law and the many smear

campaigns orchestrated by the government and its allies harmed the image of the NGO and media communities. Since the law was proposed, interviewees said that potential sources had asked whether they came from an NGO background. If they answered “yes”, the response was often hostile. Targeting grant recipients was only one of the government’s tools. For example, the Law on Amendments to the Criminal Code of the Republika Srpska, which criminalised defamation in 2023, has led to more than a hundred criminal charges and was seen as a source of self-censorship. Many journalists feared legal repercussions after publishing stories (Turčilo, 2025).

In terms of media revenues, the loss of USAID funding was considered a more significant blow than the smear campaigns. One interviewee mentioned that approximately three-quarters of her organisation’s revenues had suddenly disappeared in early 2025. “Dodik [Former President of Republika Srpska, who proposed the laws on foreign agents] put a label on us, but Trump took our money,” they said (anonymous personal communication, 2026). Some European donors stepped in to make up for these losses. However, one interviewee mentioned a general sense of disinterest from the international community, which was making Western European governments and philanthropies more inward-looking. To foster long-term resilience, NGOs and media outlets therefore started building their own communities, including networks of subscribers and other potential sources of local revenue.

Discussion and conclusion

Foreign grants are clearly means of counteracting media capture: improving an outlet’s financial position can help a newsroom withstand pressure from governments and wealthy individuals. In all four geographic contexts, independent media—especially specialised and investigative outlets—relied on foreign grants to fund their watchdog activities, at least until the introduction of foreign agent laws. It is therefore unsurprising that governments retaliated, albeit with varying effects across the cases. In this context, foreign agent laws can be considered a form of media capture because their impact is subtle and may not be recognised by observers as repression or censorship. Outlets are not explicitly told what they can or cannot publish, and the requirements imposed on news media outlets initially appear minor, such as inclusion in a registry, labelling and increased paperwork. Governments typically present these laws as administrative measures designed to increase the transparency of media funding and ownership. In practice, however, they impose burdens on media outlets that limit their ability to operate independently. Increased reporting obligations divert time and resources from journalistic work; reduced access to foreign funds increases financial vulnerabilities; reputational effects limit access to journalistic sources; and arbitrary enforcement of the law may trigger self-censorship. From a political economy perspective, this demonstrates how states can exploit weaknesses arising from the market ontology of the media: if market processes are seen as “an inevitable force of nature beyond our control or, at the very least, a public

expression of democratic desires” (Pickard, 2020, p. 175), targeting funding mechanisms can allow states to repress the media, while blaming it on “cruel markets” (Scheppelle, 2018).

Journalists in all four contexts mentioned that foreign support had played an important role in safeguarding the sustainability of their newsrooms, at least before the introduction of foreign agent laws. Across the cases, the theory of Levitsky and Way (2010) has explanatory power, but it does not account for all relevant factors. Leverage, or the government’s bargaining power vis-à-vis the West and its vulnerability to sanctions and other forms of pressure, helps explain why Russia opted for hard pressure on journalists, whereas Hungary used its laws primarily to justify smear campaigns, rather than to initiate procedures against media outlets. A more repressive law was proposed but not passed in this EU member state. Moreover, Fidesz’s loss of power in Hungary brought an end to the pressure on foreign grant recipients. In the other two cases, however, leverage is an insufficient explanation because it is counteracted by other factors. In Republika Srpska, the government positions itself against the national state, which is an EU candidate, while in Georgia, the past aggression of the neighbouring Russian Federation may have diminished the appeal and impact of the European Union that was felt in earlier years. The issue of linkage, meaning a country’s density of ties to the West or its embeddedness in Western frameworks, is especially complicated in Georgia, where a Soviet- or Russian-educated intelligentsia exists alongside a Western-educated one (Batiashvili, 2019). Here, interviewees saw greater explanatory power in Russia’s war against Ukraine, which might have raised concerns in Georgian society given that the country’s population is only one-tenth that of Ukraine and would therefore be unable to withstand a Russian invasion. This aspect may have contributed to the Georgian state significantly reducing news media’s access to foreign grants over the past two years. At the same time, the state’s inability to enforce its own regulations, as demonstrated in the case of Republika Srpska, is a factor that has not yet been adequately recognised.

The cases also highlight that country contexts are not static. A country’s—or its sub-national entity’s—relations with others, as well as its international bargaining power, may change significantly because of international or domestic developments. Moreover, authoritarian and illiberal governments are constantly testing the limits of what they can do; an ineffective measure may therefore be followed by a more repressive one.

At the level of individual media outlets, different types of media may respond differently to pressure, especially depending on the additional revenue sources available to them. The media market therefore also plays a role: when media remains a somewhat lucrative business, news outlets can prioritise advertising and subscriptions over grants. Even in weak media markets, however, independent outlets appear increasingly willing to tap into audience revenues, particularly donations and membership, to safeguard their long-term sustainability and build resilience against

future attempts at capture. Based on journalists' testimonies, there appears to be no context in which foreign agent laws are perceived as completely ineffective. Even where authorities do not directly harass journalists, interviewees reported reputational effects and a chilling effect.

Finally, the issue of foreign influence through grants—the common justification for foreign agent laws—needs to be addressed. The claim that such funding measures might compromise newsroom independence has appeared several times in the journalism studies literature (Benson, 2018; Bunce, 2016; Schiffrin, 2017). However, interviewees who received grants did not perceive any donor agenda behind the funding they received. One potential explanation is that, in the contexts examined, audiences do not have the financial characteristics that would make them particularly interesting for cause-driven donors such as the Bill and Melinda Gates Foundation or the Walton Family Foundation, which are widely seen as influencing newsroom reporting in pursuit of specific policy goals, chiefly in international development, health and education (Schiffrin, 2017; Gabor, 2021). This aspect was reiterated in a short exchange with a representative of a donor organisation that provides grants to newsrooms to cover public health and development policy.

The sustainability of grant funding is another issue raised in the literature, including the observation that newsrooms are sometimes forced to close when funding ends (Cauhapé-Cazaux & Kalathil, 2015; Nelson & Susman-Peña, 2012). The newsrooms covered in the interviews acknowledged that the sustainability of their grant-based funding depends on donors' interests and many expressed an intention to increase their reliance on other sources of income in the future. This was particularly clear in Republika Srpska, where journalists saw the end of USAID funding as a far greater threat than foreign agent laws. Nevertheless, in most cases, grants remained a relevant source of income for the near future, as long as no bulletproof funding model for independent media exists.

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