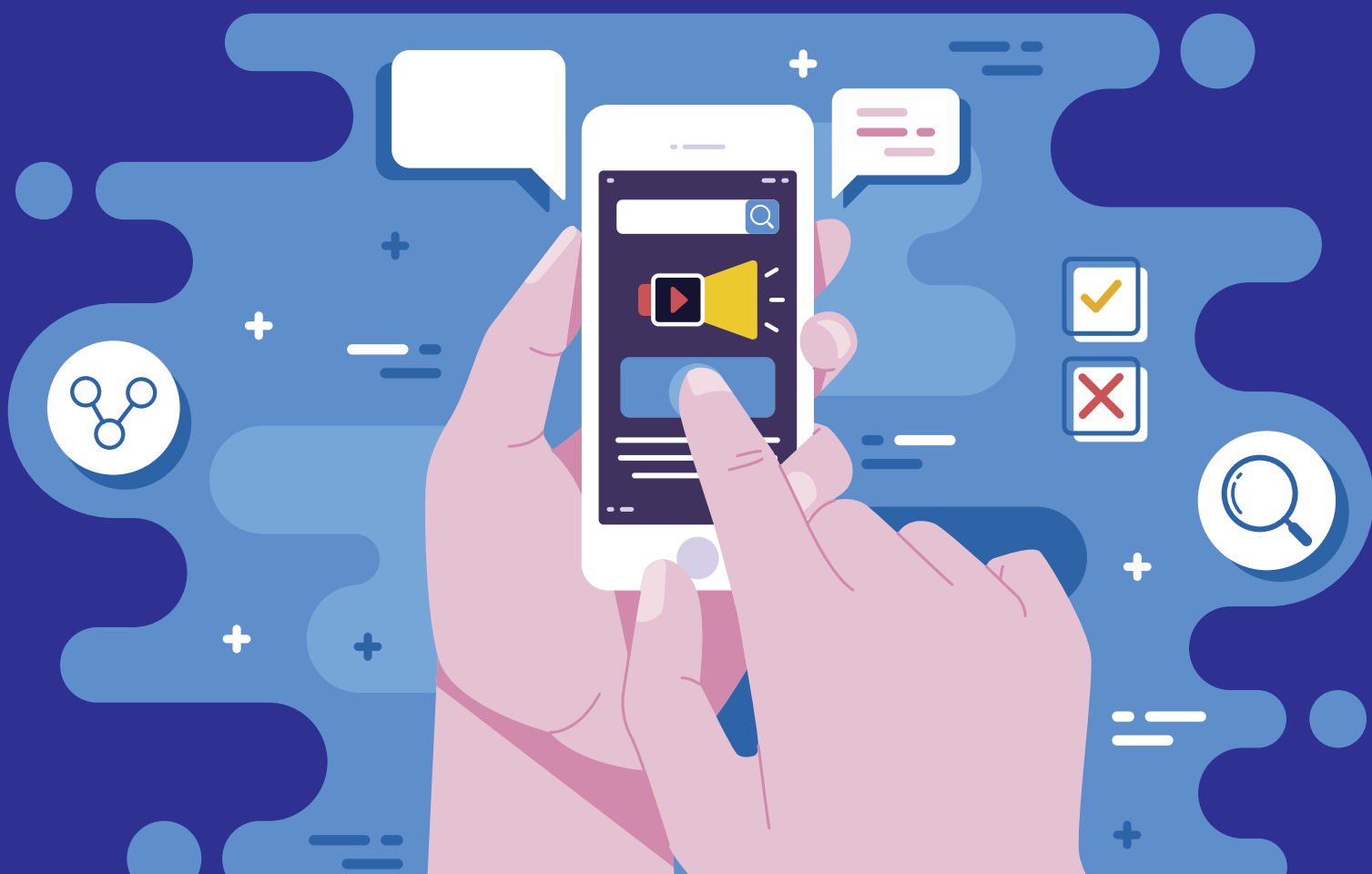# DIGITALLY MEDIATED ASSEMBLIES IN NORTH MACEDONIA

## Monitoring report

# DIGITALLY MEDIATED ASSEMBLIES IN NORTH MACEDONIA

## Monitoring report

**Authors:**
Goce Kocevski, LLM
Dushica Nofitoska, LLM

December 2022, Skopje

**Monitoring report on digitally mediated assemblies in North Macedonia**

Skopje, 2022.

Publisher: Macedonian Young Lawyers Association

Authors: Goce Kocevski

Dushica Nofitoska

# Contents

# I. Introductory remarks

This report was prepared by the Macedonian Young Lawyers Association (MYLA) under the auspices of the project *"Monitoring Digitally-Mediated Assemblies in North Macedonia"* funded by the European Centre for Not-for-Profit Law (ECNL). MYLA's work aims to ensure that the law in North Macedonia works for everyone that it serves the public interest, and is aligned with international and EU standards. One of its priority areas is the freedom of peaceful assembly. This specific report builds upon the previous work that MYLA has done in this area. It is a specialized follow-up to the report published in 2021 on the perspectives and challenges of freedom of peaceful assembly in the digital age.[1]

The report provides an overview of the current state of affairs concerning digitally-mediated assemblies[2] (DMA) in N. Macedonia, including the relevant legal framework, the frequency, occurrence and types[3] of DMAs and the enabling environment in which they happen. The objectives of the monitoring were to obtain a greater understanding of how DMAs take place in N. Macedonia, the types of DMAs, and the extent to which they are enabled, facilitated, and protected by government and private actors, as well as to identify key issues and challenges that are impeding the use of DMA as a form for realization of freedom of peaceful assembly. .

The purpose of the monitoring is to produce policy recommendations that will be able to address key problems and challenges that impede the use of DMAs as a form for realization of the freedom of peaceful assembly and to assist the authorities in creating and implementing policies for ensuring enabling environment for DMAs. Protecting freedom of peaceful assembly as embedded in the EU *acquis*[4] and its realization in N. Macedonia shall be under scrutiny by the European Commission in the upcoming process of accession negotiations. Therefore, independent monitoring by CSOs will serve as an indispensable resource to the authorities to ensure full compliance with the EU standards. The Council of Europe[5] and the UN[6] have also underlined the importance of ensuring respect for the right to peaceful assembly.

---

[1] Nofitoska, D. Dishlioska, V. *The Future of Freedom of Assembly in North Macedonia in the Digital Age.* Macedonian Young Lawyers Association. Skopje, 2021.

[2] For the purposes of this report, MYLA will use the definition of ENCL that defines digitally mediated assemblies as a gathering of more than one person for specific purposes that takes place either through the support of, or by means of, digital communication technologies (e.g., mobile phones, Internet services, or social media). In other words, digitally-mediated assembly is the umbrella term that encompasses all types of assemblies with a digital component at the very least. See: ECNL's Factsheet on Digitally-Mediated Assemblies and UN standards, 2020.

[3] There are three types of DMAs. 1. **Digitally-enabled**: taking place in physical spaces but facilitated by digital technologies (in particular by the Internet), because they are previously discussed, organized and/or promoted through them; 2. **Digitally-based**: taking place in an entirely virtual space (usually the Internet); & 3. **Hybrid**: with elements of both. For example, they are organized via social media and take place both in physical spaces and online or they started in physical spaces but are continuing online or vice versa, etc. See: ECNL's Factsheet od Digitally-Mediated Assemblies and UN standards, 2020.

[4] The Chapter 23 of the EU acquis includes the protection of fundamental freedoms.

[5] Recommendation of the Committee of Ministers to member States on a Guide to human rights for Internet users of 16 April, 2014

[6] UN General Assembly The promotion, protection and enjoyment of human rights on the Internet adopted by the Human Rights Council on 1 July 2016.

# II. Methodological approach

The process of drafting this monitoring report followed a methodology developed by ECNL[7]. The authors combined several data-gathering methods in order to obtain a greater understanding of how DMAs take place in N. Macedonia, the types of DMAs, and the extent to which they are enabled, facilitated and protected by the government and private actors.

## i. Data collection and analysis

The process of data gathering included:

- **Documentary research** of relevant legislation[8], international and European standards, available reports and data on law enforcement requests published by social networks;

- **Structured and continuous observations** of present and new digitally-mediated assemblies through review of the publicly available content on social media and on the internet in general (for the list of observed DMAs see section 4 from the Findings);

- **Semi-structured individual interviews** with 4 organizers of DMAs that agreed to be interviewed for the purposes of this report. The findings of the interviews are presented in sections 2 and 4.

- **Gathering data from the Ministry of Internal Affairs (MoIA) through free access to information requests**. The team requested data from the MoIA about the number of requests for removing content, suspending accounts and conducting special surveillance measures; however, the MoIA directed us to request the data from the social media platforms.[9]

- **Conducting case studies on specific and well-known DMAs.** The assessment framework for the case studies encompasses a description of the DMAs, classification (digitally-enabled, digitally-based & hybrid) and duration thereof, number and structure of supporters, impact, geographic scope, use of social media, and other relevant elements outlined in the Guide on digitally-mediated assemblies and how to monitor them by ECNL[10].

## ii. Limitations in data collection

The team identified some limitations to the methodology used.

1) **Identification of organizers/participants** – Being able to identify the organizers of a digitally-mediated assembly facilitates conducting interviews as a data-gathering tool for monitoring purposes. The inability to conduct an interview limits, to a certain extent, the ability of a researcher to obtain a greater understanding of the motive, objectives, and messages of a specific DMA. The perspective of the organizers/participants is also important to identify any challenges that they have experienced in the process of organization of the protest.

---

[7] Petters, J. Guide on Digitally-Mediated Assemblies and How to Monitor Them. European Center for Non-for-Profit Law, 2022.

[8] Law on Peaceful Assemblies, No. 55/1995; Law on Electronic Communications 39/2014; Law on Police No. 114/2006; Law on Personal Data Protection No. 42/2020: Law on Criminal Procedure No. 150/2010; Criminal Code No. 37/1996.

[9] Information from the Ministry of Interior No. 1612-1192/1 from 05.10.2022. The decision was not appealed due to the time constraints for producing the report.

[10] Peters, J et al. *Guide on Digitally-Mediated Assemblies and how to Monitor Them*. European Center for Non-Profit Law. 2022.

The identification of organizers requires deeper "digging" through the posts in the groups and following of the discussion in the group to locate the specific organizers. Sometimes, the people listed as organizers on social media platforms use pseudonyms or are not genuine. Identification of participants (e.g. their sex, age) and their locations can be hard and time-consuming if there is a need to check their locations/cities one by one, following their profiles in order to get the general picture of the assemblies' participants.

2) **Evidence of government interference** – This limitation relates to the difficulties of accessing credible data on whether and to what extent the government (its agencies) interfered in specific DMAs. It is a result of both the confidential (and sometimes covert) nature of such activities and the specifics of interference in the online world, which is not always visible. This makes it difficult to discover or to prove that the government interfered with the technologies used in organizing, publicizing, or hosting the assembly, except in cases when the interference is obvious and largely visible. For example, when blocking and hindering internet connectivity or web connectivity happens during offline protests. It may still be problematic to demonstrate a connection, if the disruption is done in short periods and 'dosed' so that people do not notice that they are all having the same problem with the network.

3) **Covert engagement of governments (for surveillance purposes**) – This limitation restricts the possibility of participants and researchers to identify whether the physical protests were monitored or recorded. There were cases, e.g., in the past where non-uniformed individuals without any credentials took photos of protest participants.[11] The use of technologies by the government to engage with the assembly (surveillance, data and evidence gathering, targeting participants, etc.) can also be challenging to discover and notice.

4) **Insufficient data for short-lived assemblies** - Another general challenge for some of the assemblies may be the insufficient data available online for the research, especially when it comes to smaller and short-lived assemblies, as such not covered that much by the media. This is relevant for the research because it risks narrowing down the research only to the largest and most publicized assemblies, leaving aside the observation of smaller assemblies and their characteristics.

5) **Data from social media platforms** Another limitation is the fact that when social media platforms release reports data on the requests received to remove content, they publish only aggregated data, so within this data a researcher cannot accurately identify, for example, what percentage of these requests regarded a DMA. For example, social media platforms are publishing general data on requests received from governments for information on users and for content removal. However, each of the platforms is using different classification criteria to categorize the requests received, and in their transparency reports, most of them do not give data available on the exact reason behind the request.[12]

---

[11] The Law on Police provides a ground for recording of a public gathering by police officers only in specific circumstances (danger on life, health and property) and after the intent to record has been publicly announced. The recorder material is kept within the Police for six months after which is destroyed with exemption of the material that is used as an evidence in criminal or misdemeanor procedures. See Art. 25 from the Law on Police, No. 114/06.

[12] Google for example has more detailed classification of the removal requests giving some reasons like- National Security, Defamation, Privacy and Security, Adult Content, Hate Speech, Impersonation, Violence

# III. Key findings

## i. Legal framework relevant for DMAs

The existing national legal framework does not explicitly acknowledge and protect DMAs (as defined in the introduction) as a form of assembly, distinct from assemblies in physical space. The term "public gatherings" can and should be interpreted in a broader sense of the word, by including the DMAs. However, due to the nature of DMAs, their legal regulation goes beyond one specific law or legal area and encompasses different aspects of criminal law, personal data & electronic communications.

### General legislation

**The Constitution** explicitly protects the right of citizens to gather peacefully and to express public protest without prior announcement and special approval.[13] The exercise of this right may be restricted only during states of war and emergency. The rights to privacy, personal data protection, inviolability of the home as well as freedom and inviolability of correspondence and other forms of communication are enshrined and guaranteed in the Constitution.[14] Only a court decision may, under specific conditions and in a procedure set out by a law (adopted with a two thirds majority), authorize non-application of the right of inviolability of correspondence and all other forms of communication, provided that it is indispensable for the purpose of preventing or revealing crimes, conducting criminal proceedings or where required in the interests of security and defence of the Republic. The right to the inviolability of the home may be restricted only by a court decision in cases of detection or prevention of crimes or protection of people's health. The **Law on public gatherings** further elaborates and develops the specific criteria and procedures for the realization and protection of the right to peaceful assembly. The law defines public gatherings[15] as:

- gatherings of more than 20 citizens,

- in an open or enclosed space,

- for the purpose of fulfilling entertaining, cultural, religious, humanitarian, social, political, economic, sports, or similar interests of the citizens, organized by reason of public expression of opinion or protest.[16]

The law defines the space only in terms of whether is open (outside of buildings) or closed within specific constructions and does not refer to the ownership of the place, i.e., whether it is public or private. The limitations of the rights are explicitly stipulated. They include:

---

[13] Constitution of RNM, Art. 21.

[14] Constitution of RNM, Art. 17, 18, 25 & 26.

[15] Law on Public Gatherings, No. 55/95. Art. 2.

[16] It should be noted that the Law also lists the gatherings that are not considered as public gatherings such as: religious ceremonies held in spaces intended for religious purposes; regular folk ceremonies; burial processions; gatherings in places where the free access is closed due to consideration of trade unions issues; regular gatherings of cultural and entertaining or sports nature which the organizer, within the framework of its activity, organizes in enclosed spaces intended for that purpose; and regular gatherings, meetings, seminars, forums of representatives of state bodies, organizations or other legal entities while exercising their competence, that is, the activity, gathering of political parties and alike, in enclosed spaces.

- Prohibition of public gathering next to healthcare institutions, in a manner that obstructs the access of ambulance vehicles and disturbs the peace of the patients; next to kindergartens and schools while being attended by children, and on highways and national roads, in a manner which jeopardizes the traffic.

- Persons present at the public gathering must not carry weapons and generally harmful objects, as well as alcoholic beverages and narcotic drugs

- Grounds for stopping the gathering by the Police if it is directed towards jeopardizing the life, health, security, personal safety and property of the citizens; committing or encouraging the commitment of criminal offenses defined by law and jeopardizing the environment.

In accordance with the Constitution, advance notification is not necessary, though the organizer of the gathering may inform the Police in the interests of public safety.

**The Law on Police** is relevant for the DMAs since it regulates the authorizations of the Police in maintaining public order, gathering information as well as taking actions for the prevention of crimes.[17] It provides a ground for recording of a public gathering by a police officer only in specific circumstances (danger on life, health and property) and after the intent to record has been publicly announced. The recorded material is kept within the Police for six months after which is destroyed with the exception of the material that is used as evidence in criminal or misdemeanour proceedings. By the rules, when maintaining public order police officers must wear a uniform. Only upon order from superior officer, a police officer may act without a uniform. In that case, they are obliged to identify themselves before taking any police action. The law also regulates the actions of the police when gathering information and documents upon order from the Public Prosecution as well as when conducting special investigative measures upon order by a judge in accordance with the Criminal Procedure Code.

### Other laws and/or legal provisions that exist and shape the environment for DMAs

*New technologies and Criminal Code*

When it comes to new technologies, the **Criminal Code** provides for a range of crimes that can be committed through a computer system. Regarding the exercise of the right to freedom of peaceful assembly by using new technologies, it is of particular importance to emphasize the existence of crimes such as *damaging and unauthorized access to a computer system*, *creating and importing computer viruses* as well as *dissemination of racist and xenophobic material through a computer system*.[18] These crimes *inter alia* prohibit damaging and unauthorized access to a computer system as well as creating and importing viruses, making it difficult to use the computer system, entering without authorization in a foreign computer for exploiting its data, intercepting the transfer of non-public computer, etc. This (at least on a normative level) prevents private persons from interfering in online gatherings. The incrimination of dissemination of racist and xenophobic material and hate speech should help prevent misuse of the DMAs. A new Criminal Code, which is currently being drafted, will include more specific provisions related to crimes conducted in the cyberspace.

---

[17] Law on Police. No. 114/2006.
[18] Criminal Code, Art. 251, 251-a, 394-g.

*Disinformation & fake news*

As a relatively new phenomenon, the problem of disinformation and fake news has an effect on the enjoyment of the rights of freedom of peaceful assembly in a digital setting since the objective and messages of the assembly might be significantly distorted thus limiting the potential impact of specific DMA. Although the Macedonian normative system does not have an adopted definition for organized disinformation (fake news,) there is a consensus on the operational meaning of the term, which more or less coincides with the definition in the Cambridge dictionary: untrue information disseminated with the intention of leading people to believe falsehoods. The intent is one of the key elements for determining guilt in the criminal justice system and the incrimination of creating and spreading misinformation is indirect. This means that although there is no specific crime related to the spread of fake news, the Criminal Law in a substantive sense may allow criminal prosecution for activities of this nature. This issue has become particularly relevant since the outbreak of the COV-ID-19 pandemic, and information has been published in the public about several submissions to the Public Prosecutor's Office related to this topic.

*Law on protection of personal data*

The Constitution protects the security of the personal data and guarantees the confidentiality thereof. The citizens are guaranteed protection against violation of the personal integrity deriving from the registration of information about them through data processing. The protection of the personal data is further regulated in more details with the **Law on Protection of Personal Data** dated 2020 (in which the provisions of the General Data Protection Regulation are transposed). Protection of personal data is guaranteed to every natural person without discrimination. Exemptions are allowed for protecting the interests of the state security and defence of the Republic of Macedonia.[19] The law sets specific (and often) demanding obligation for personal data processors who in certain situations might be organizers of online DMAs. The level of obligations depends on the types of data processed.[20]

The law also sets the safeguards for video surveillance by CCTV as well as the use of face recognition software by requiring prior approval. In cases of video surveillance there is an obligation for visible public announcement that the area is recorded, with reference to the name of the owner of the recording as well as contact information where additional information about the scope, objective and storage of the recordings. The recordings are only kept for 30 days unless an authorized body requires them for legal purposes (e.g.. criminal investigation). There must be a legitimate aim for installing video surveillance[21]. The subjects who have installed video surveillance are supervised by the Agency for Personal Data Protection. For processing biometric data, prior approval by the Agency for Personal Data Protection is required. There is no publicly available information on whether such request has been filed to the Agency and whether face recognition software has been installed in existing CCTV systems.

---

[19] Law on Personal Data Protection No. 42/2020.

[20] Processing special categories of personal data is allowed only by exemption and upon informed consent, and meeting additional explicit criteria stated in the law. The type of data that should not be processed in common circumstances include: racial or ethnic origin; political beliefs; religious or philosophical convictions, membership in trade unions, data about genes, biometrical data, data on health, sexual life as well as sexual orientation.

[21] Protection of life and health; Protection of property; Protection of life and health of employees due to the nature of the work; and ensuring control who enters and exists from business premises.

## Interception of communications

The **Law on Interception of Communications**, the Law on Criminal Procedure and the **Law on Electronic Communications** regulate the interception of communications and retention of so-called metadata. The provision on interception of communications was formerly part of the provisions in Law on Electronic Communications. However, in 2018, a special law was adopted - the Law on Interception of Communications. Interception of communications means secret acquiring of the content of any communication and at the same time creating a technical recording of the content of the communication, with a possibility to copy it. Hence, it means monitoring the communications on social networks through the already existing platforms (Viber, Facebook, WhatsApp, and Skype) but does not cover the insight into the Meta data from the conducted interception of communications.

## Law on Criminal Procedure

According to the **Law on Criminal Procedure**, the Public Prosecutor or a judge can order special investigative measures (SIM) when it is likely that data and evidence necessary for successful conduct of the criminal procedure can be secured, and when such data and evidence cannot be otherwise obtained. One of the legally stated 12 special investigative measures is insight into realized telephone and other electronic communications done through the Internet, with the help of special forensic computer programs (remote forensic software). In this way, all telephone conversations conducted over the Internet can be inspected, as well as all forms of electronic communications (e-mail communication, Facebook chat, etc.). For issuing an order for the implementation of this special investigative measure, the public prosecutor can submit a request to the public communications operators who on their part are obliged to process the request. The public prosecutor may also request the police or other state bodies to provide data that is relevant for investigating and prosecuting crimes.

## Law on Electronic Communications

This law sets the legislative framework for telecommunication companies to collect, keep, and, upon requests from authorities (in accordance with the provisions of this law and the Law on Criminal Procedure) provide data on the electronic communications (phone calls, location, online activity, etc.). The operators are obliged to keep the data on electronic communications created or managed by them while providing public electronic communication networks and/or services in order to enable criminal proceedings or protect the security and defence interests of the Republic of North Macedonia. Operators are required to retain the following types of data:

  – Data needed to monitor and identify the source of the communication;
  – Data needed to identify the destination of the communication;
  – Data required to identify the date, time and duration of the communication;
  – Data required to identify the type of communication;
  – Data required to identify the communication equipment of the user or the communication equipment considered to be his;
  – Data required to identify the location of mobile communications equipment;

Operators also store data on failed call attempts. Operators have no obligation to retain data for calls that have not been established. Operators must not retain data that reveals the content of the communication. The operators are obliged to keep the data for a period of 12 months from the date of the communication. The operators are also obliged to keep the data for the current geographical, physical or logical location of the terminal equipment of their subscribers, i.e. users regardless of their communication activity. Operators retain this data for the last 72 hours. Operators are obliged to keep the data on the electronic communications, created or processed by them while providing public electronic communication networks and/or services in order to enable the availability of this data to prevent or detect criminal acts, to conduct criminal proceedings or protect the security and defence interests of the Republic of North Macedonia.

## ii. DMAs in N. Macedonia – An organizer's perspective

During the monitoring process so far the following several publicly well-known DMAs were identified and elected to be subject to monitoring The criteria that we've used in the selections were: the reach of the DMAs (i.e. number of followers & supporters;); the duration of the DMAs; the objectives of the DMAs (should be related to an issue of broader societal significance) as well as the availability of data about the DMAs.

### Digitally-enabled assemblies

- Assembly against the French proposal regarding EU accession talks under the slogan "ULTIMATUM - No thanks!"

- LGBT Pride event

- Assembly against the proposed Anti COVID-19 measures under the slogan "Stop taking away our liberty".

- Assembly in Tetovo for deadly fire in the COVID-19 mobile hospital, which killed 14 people.

### Hybrid assemblies

- Assembly against the online sexual harassment like a response to the harassment happening in the Telegram chat group named "Pubic room".

- Assembly of the private dentists and family doctors to share their dissatisfaction with the attitude of the health authorities towards them.

- Assembly against construction of high-rise buildings on a prominent site in the centre of Skopje.

Among these assemblies there are both, digitally-enabled and hybrid assemblies. *In North Macedonia, most of the assemblies are still digitally–enabled (i.e., taking place in physical spaces, but facilitated by digital technologies).* Digital technology is used mainly for organizing and promoting protests.

There is a consensus among the interviewed organizers of protests (including, e.g., LGBT Pride, Public Room and High Rise Buildings),  that though social media and the new technologies have significantly facilitated the process of organization and promotion, their impact on policies and decisions remains, for now, still weak. Therefore, it is necessary for all online activities to be complemented by simultaneous conventional (in-person) protests.

The largest and most impactful DMAs were the assemblies against the French proposal regarding EU accession talks under the slogan "ULTIMATUM - No thanks!" and the one against the proposed Anti-COVID=19 measures under the slogan "Stop taking away our liberty". The research started with observations on publicly accessible social media platforms related to the assemblies, like Facebook, Twitter, Instagram, YouTube, etc., and on publicly accessible news sites, petition platforms etc. The protests happened recently, so the observing was on a content that was and remained online—extracting and saving content that is relevant (saving the web links of assemblies Facebook groups, related news, videos, twitter posts, hash-tags activities, discussions, debates etc.).

– People organizing and supporting DMAs on issues such as LGBT, women rights experience online threats and hate speech

The organizers of DMAs, especially those related to LGBT Pride March, women's rights and protection of gender-based violence are experiencing online threats and were subject to hate-speech. This is especially the case when at the same time there is another "counter protest" initiated by persons or groups from the other side of the ideological spectrum. The channels for these intimidations were direct messages on social media platforms or posts and comments. A significant challenge in managing the DMAs and their messages were the "trolls" who by providing fake or misleading information or by provoking are contributing to undermining the message of the DMA. The threats and hate speech have been reported to the Police but the prosecution of perpetrators is very ineffective.

Though existing, on DMAs related to other topics the incidence of threats and hate speech in the virtual world were much less present.

– DMAs manifestation on social media platforms  is not protected

For communication and promotion, the most dominant social platforms used were Facebook and Instagram. For organization and logistics, the DMAs organizers used FB groups, Slack, WhatsApp & Viber groups. There are concerns expressed by the organizers of DMAs that the privacy and personal data protection among DMAs as well as at conventional public gatherings is not sufficiently protected and that names or organizers and participants have been leaked and publicly shamed (in cases where they were acting via pseudonyms/nicknames) in a setting where they expected privacy.

The fact that social network platforms are playing by their own rules, and not by the laws of the country where the DMA is happening (for national DMA) might cause problems if the rules are not harmonized and in compliance among each other. In addition, there is insufficient understanding of the terms and conditions of social media platforms and the legal technicalities on their use among DMAs organizers that might have a negative impact on their potential to motivate and organize.
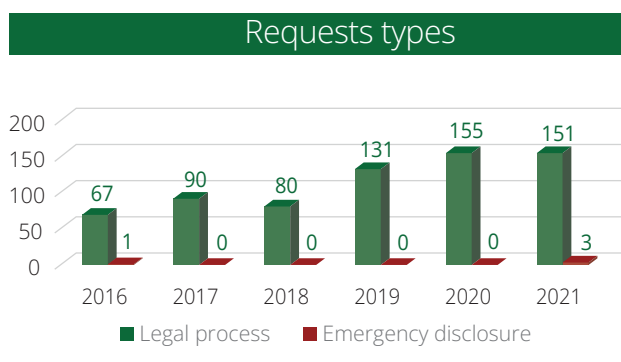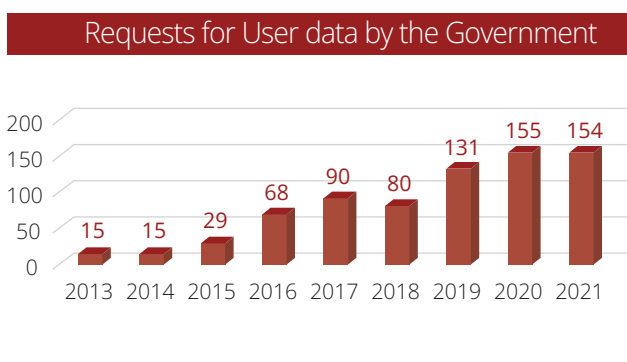
## iii. Requests for user data and removing content

We reviewed the policies as well as data (number of requests for information and for removing content) of the technology companies that operate freely in North Macedonia, such as Meta, Twitter, Google, to search for evidence on how they have moderated their users' messages and activities and how they have responded to any government requests for content moderation or users' data (potentially including users that were part of DMAs).

One key challenge encountered is that the data published by the social media companies does not enable sufficient desegregation (only two broad categories of requests: legal process and emergency disclosure) in order to assess whether and to what extent the law enforcement institutions required user data and removing content related to DMAs. The companies provide merely statistical information on the type of requests and their response.

### META-Facebook and Instagram

In 2021, there were 154 total requests received from the national authorities. Of them, 151 were legal process requests[22] and 3 were emergency disclosure requests[23]. Information for 88 users/accounts was requested. The percentage of requests where some data was provided to the authorities is 42%. The greatest number of requests are noted in 2020 when the government submitted 155 requests, where also the biggest number of users/accounts is requested- 223.



Requests for User data by the Government

| Year | Value |
|------|-------|
| 2013 | 15 |
| 2014 | 15 |
| 2015 | 29 |
| 2016 | 68 |
| 2017 | 90 |
| 2018 | 80 |
| 2019 | 131 |
| 2020 | 155 |
| 2021 | 154 |



Requests types

| Year | Legal process | Emergency disclosure |
|------|---------------|----------------------|
| 2016 | 67 | 1 |
| 2017 | 90 | 0 |
| 2018 | 80 | 0 |
| 2019 | 131 | 0 |
| 2020 | 155 | 0 |
| 2021 | 151 | 3 |

The Government submitted seven (7) preservation requests[24] (preserve account information pending a legal process), all of them for user accounts.

---

[22] Requests from governments that are accompanied by legal process, like a search warrant. Facebook disclose account records solely in accordance with their Terms of Service and applicable law.

[23] Emergency disclosure requests: In emergencies, law enforcement may submit requests without legal process. Based on the circumstances, Facebook may voluntarily disclose information to law enforcement where they have a good faith reason to believe that the matter involves imminent risk of serious physical injury or death.

[24] Facebook accepts government requests to preserve account information pending receipt of formal legal process. When they receive a preservation request, they preserve a temporary snapshot of the relevant account information but will not disclose any of the preserved records unless and until they receive formal and valid legal process.

## AMOUNT OF PERSERVATION DATA
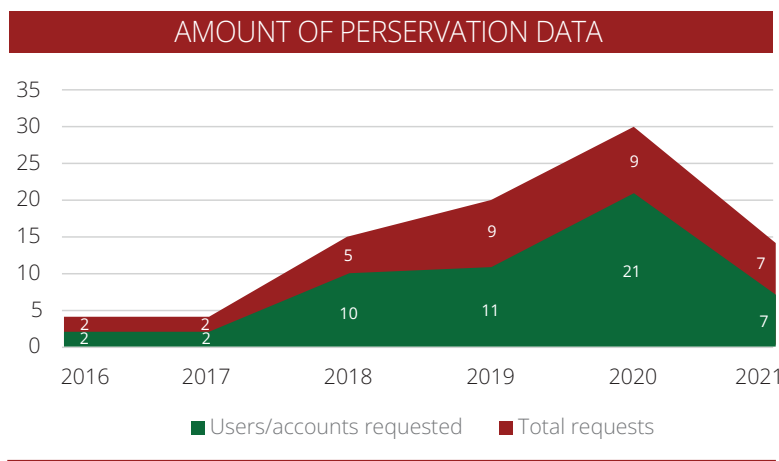


When governments believe content on Facebook or Instagram goes against local law[25], they may ask Facebook to restrict the content. They may also receive court orders to restrict content or reports from non-government entities and members of the public alleging content is unlawful.

The amount of content restricted for 2021 is 24 all of them categorized as global restrictions externally imposed. Eight of them were restrictions on Groups and pages and 2 were Profiles on Facebook. On Instagram, there were 14 accounts restricted.

## AMOUNT OF CONTENT FACEBOOK RESTRICTED



---
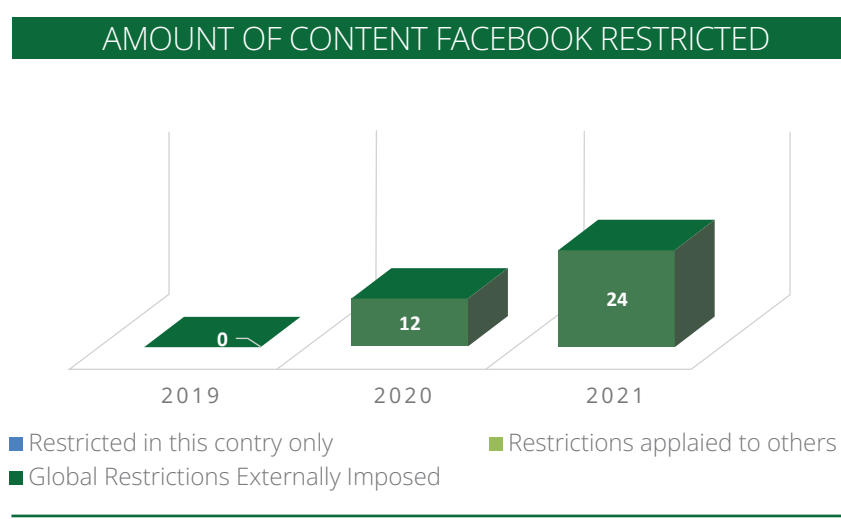
[25] They review these requests in line with their commitments as a member of the Global Network Initiative and Corporate Human Rights Policy.

## TWITTER

According to the information available on Twitter Transparency Center[26], in 2021 Macedonian government submitted 9 Information requests[27] all of them routine[28]. The number of accounts specified[29] for this period is 15. The compliance rate is 0%. Compliance rate refers to the percentage of information requests where Twitter produced at least some of the requested account information. During 2021 there is no removal request[30] by N.Macedonia. In 2018 there was one removal request[31] and it is the only one from N.Macedonia. It is under the category of 'other legal demands' and the number of combined accounts specified is 4. The highest number of Information Requests were asked in 2020.

[26] https://transparency.twitter.com/en/reports/countries/mk.html
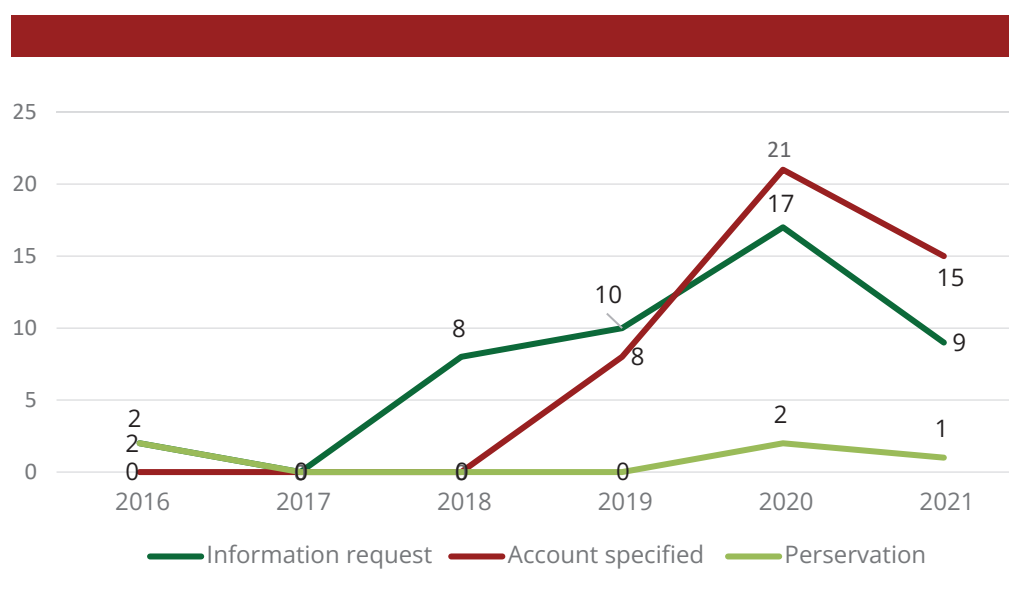
[27] "Government information requests" include both emergency and routine legal demands for account information issued by law enforcement and other government agencies to Twitter.

[28] Routine requests" (aka non-emergency requests) are legal demands issued by government or law enforcement authorities (e.g., subpoenas, court orders, search warrants) that compel Twitter to turn over account information.

[29] "Accounts specified" include Twitter and Periscope accounts identified in information requests Twitter have received. This number may include duplicate accounts or requests for accounts that do not exist or were misidentified. This number does not include multiple identifiers associated with one account within one request (e.g., if a request contains an email address and the associated @username, they count them as one account identified)

[30] This data includes the number of legal demands received to remove or withhold content, the number of accounts specified in these requests, and the total compliance rate (a combination of Twitter's removal actions: accounts withheld, Tweets withheld, and accounts TOS).

[31] Legal demands to remove content from Twitter, and other requests to remove content based on local law(s) from around the world.

DIGITALLY MEDIATED ASSEMBLIES IN NORTH MACEDONIA – Monitoring report

## Google

Governments contact Google with content removal requests for a number of reasons. Government bodies may claim that content uploaded by third parties violates a local law, and include court orders. Google's reports also include government requests to review content to determine if it violates Google's own product community guidelines and content policies.[32] There has been no request from the government regarding the above-mentioned information in the past 5 years. There is one request in 2012 for removal on You Tube for reason of national security.

When it comes to global requests for user information, a variety of laws allow government agencies around the world to request user information for civil, administrative, criminal, and national security purposes. Google gives information in the transparency report about the number and type of requests they receive from government agencies that are permitted by applicable laws. In 2021 from N. Macedonia, there were 15 requests for disclosure of user information with 241 accounts involved. The % of requests where some data was produced is 0%.

### REQUESTS FOR USER INFORMATION

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|---|---|---|---|---|---|---|
| Requests for disclosure of user information | 4 | 10 | 7 | 14 | 5 | 13 |
| Accounts | 6 | 13 | 8 | 25 | 47 | 241 |

■ Requests for disclosure of user information   ■ Accounts
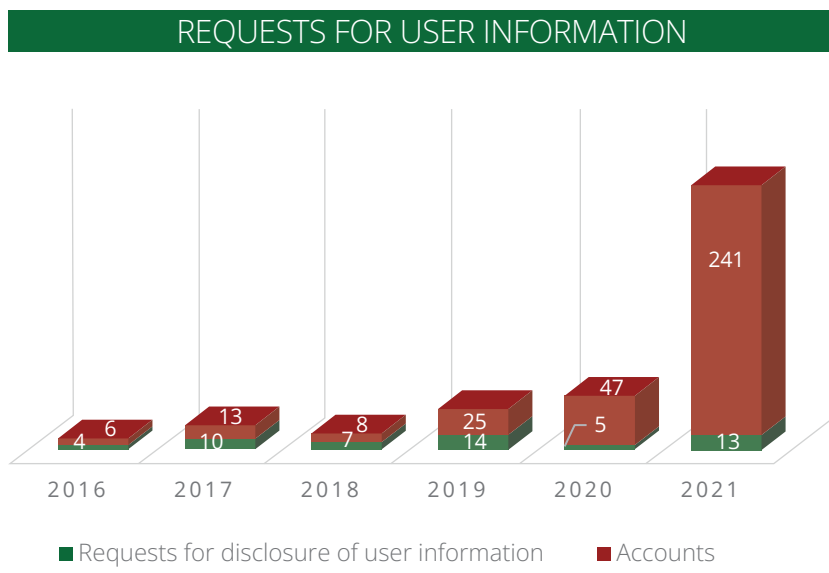
## TIK TOK

TikTok claims to be committed to responding to law enforcement requests for user information in a manner that respects the privacy and other rights of their community members. Any request they receive, as per their claim, is carefully reviewed on a case-by-case basis. Their policies and procedures govern how TikTok handles and responds to law enforcement requests and require that TikTok disclose user data only when a request is based on a valid legal process or in emergency circumstances. In limited emergencies, TikTok discloses user information without legal process when they have reason to believe, in good faith, that the disclosure of the information is necessary to pre-

---

[32] Google gives some categories for reasons why the removal request were made by the government. The reasons are the following: Defamation, Privacy and Security, Adult Content, Hate Speech, Impersonation, Violence, National Security etc. However, there is no more detailed info on whether the request is somehow connected to DMAs. Anyhow, there have been no recent requests from Macedonia. The last one was in 2012 for removal on You Tube for National Security reason.

vent the imminent risk of death or serious physical injury to any person. There is no information on whether such disclosures were done upon request from authorities from N. Macedonia.

According to the data on Tik Tok Transparency Page[33] in the period 2019-2021 the Macedonian government submitted only 1 Information Request on User Information in 2021. The request falls under the emergency category[34] and it is for 1 account specified. The percentage of emergency requests where some data was provided is 100%.

There are no removal requests from the Government since TikTok's existence (2019).

## iv. Case studies of specific DMAs

From the identified 10 DMAs, we decided to focus on four cases, and understand more of how they take place in N. Macedonia and the extent to which they are enabled, facilitated, and protected by governmental and private actors.

For each case, we provide the following structure:

1) Overview of the protest

2) General information and characteristics (How? Who? Where? When?)

3) Messaging and measuring impact

4) Level of use of digital technology and social media

5) The manner of interaction between the online offline activities

6) Specifics features of the DMAs

## Case 1: ULTIMATUM - No, thank you! Protest against the humiliating proposal for Macedonia

### Overview of the protest

The protest started spontaneously at the end of June 2022, following the Government's presentation of the French proposal for resolving the bilateral problem between N. Macedonia and Bulgaria on EU accession, and the familiarization of the public with its content. The protest began with a demand for resignations from the government, ensuing the Prime Minister Kovachevski statement that the French proposal would be accepted. The protests were held in public space at several locations throughout the city every day starting from 1 July 2022 until 17 July 2022 (the main one on 14 July). Starting from 7 July, a Facebook group was opened for the protest, named as: *ULTIMATUM – No, thank you! Protest against the humiliating proposal for Macedonia.* [35]

---

[33] https://www.tiktok.com/transparency/en-us/information-requests-2021-2/

[34] An emergency request means that TIk Tok received information from the government that according to their assessment is sufficient to establish a good faith belief that there is an emergency involving imminent harm or the risk of death or serious physical injury to a person, Tik Tok may provide user data necessary to prevent that harm, as permitted by applicable law. All emergency requests must be made by a sworn law enforcement official, and come from an official law enforcement email domain (if sent via email).

[35] Government, Parliament, Ministry of Foreign Affairs, Ministry of Justice, etc.

In parallel, on July 3, 2022, the hashtag #ultimatumneblagradam was opened on Twitter, with the posting of a banner and a call for Ultimatum no thank you protest, with indicated time and place of the protest. The first post is on VMRO DPMNE's Municipality committee- Center Facebook page. The number of followers on the Facebook page is 331. The number of people who used the hashtag on Twitter is lower – just over 20 posts, with an average of less than 100 likes. The number of people at the live protests was higher – the media reported a figure of 10,000 people at the protests, with the overall number possibly being higher, because the protests were held in several cities across Macedonia, and there were also protests held in the diaspora.

## General information and characteristics

### How?

Though the protest started spontaneously, at a press conference of VMRO DPMNE that was organized on the same day the proposal was announced, the leader Hristijan Mickoski called the citizens to a protest to express their dissatisfaction with the French proposal. Although the call for the big protest was for the following Saturday, citizens started gathering in front of the Government building on the very same day.

### Who?

There is no specific information about who and how many organizers there were. Still, VMRO DPMNE party, through its leadership and membership, had a great influence in the organization of the protests. The leadership of the Left and its membership were particularly involved in the organization and the activities of the protests.

In general, the participants in the protest were dissatisfied citizens. The age, gender, and nationality of the demonstrators were also diverse. Most of the demonstrators were physically present at the protests; however, there was a significant number of demonstrators active on the social media. The total number of participants was more than 10,000 people, most of them from Skopje. There were also citizens from other cities throughout Macedonia that came to the protests in Skopje. Some of them were organized by the opposition party and came by organized buses, including citizens who expressed their dissatisfaction on social networks.

### Where and when?

The DMAs started on 01.07.2022 and lasted until 17.07.2022, the date when the government accepted the French proposal. They were held in Skopje, every day, in different locations and time (mostly at 7-8 o'clock in the afternoon or at noon). The first activity on Twitter started on 03.07.2022 with the hashtag, and the Facebook group was created on 08.07.2022.

The protest was of a national character, yet solidarity and support were also received from the Macedonian diaspora around the world, especially on Facebook and Twitter. In some countries, physical protests were organized in front of French embassies.

## Messaging and measuring impact

Through the protest, the citizens expressed dissatisfaction with and opposition to the French proposal. Thousands of citizens, including public figures, journalists, professors, and representatives of associations, called on the Government not to sign the French proposal with the message "We will

never give up Macedonia under any conditions". Under the motto "ULTIMATUM - No thanks" thousands of citizens protested against the acceptance of the French proposal to lift the Bulgarian veto and open the negotiations for membership of North Macedonia in the EU. The protest was supported by several political parties and civil society organizations. They were against the government signing the French proposal, which, as they pointed out, was extremely bad for the Macedonian people and Macedonian national interests. Journalists, university professors, musicians also addressed the protest. They urged the Government not to sign the proposal with the message "Macedonia is all we have and we will never give it up under any conditions".

The messages were sent to the government, government representatives, MPs, and to the European Union and the member states, the Government, the Assembly, the Ministry of Foreign Affairs, the Ministry of Justice, the Prime Minister, the President.

Hate speech was noted on the social network @Facebook, more specifically on the Facebook page of TV Alfa (@AlfaTelevizijaMk). The comments under the published video are filled with hate speech and calls for violence aimed at members of the ruling majority, that is, as the comments say, the "traitors". The comments were as follows: "let's not forget about Prespa, they should also burn", "death for the traitors, freedom for the people of Macedonia", "this is how they will burn in hell", "they should be burned alive", "all a kilo of gasoline each to finish the job", "set them on fire in the building, let them burn like mice", "death to the traitorous communists", "take the traitorous northerners and put them in the fire...", "the bandits let's turn them into ashes" and many other similar comments- causing hatred, discord or intolerance on national, racial, religious and other discriminatory grounds. Hate speech was also noted on the social network @Twitter, more specifically on the Twitter profile of Prime Minister Dimitar Kovachevski and a few more media portals.

On several occasions, the protest included riots and violent situations and several incidents were noted. During the protests, more than 20 people were detained, and around 50 police officers were injured, 11 of them seriously. As a result of the incidents and violence during the protests, the Prosecutor's Office filed an indictment against 12 people for participating in the incidents during the protests in Skopje related to the French proposal to start negotiations with the European Union, Nine of the individuals were charged with the crime of "Participation in a crowd" and three people are being prosecuted for "Causing general danger".

Seven of the eight boys charged with participating in a crowd pleaded guilty and all were sentenced to suspended prison sentence of two years under the condition that they won't commit another crime within four years (Art. 385 paragraph 2 c.c paragraph 1 c.c. Art. 22 from the Criminal Code). A full procedure was conducted for one of the persons. Two verdicts for the crime of causing general danger were passed. The first prison sentence for throwing a Molotov cocktail, and the second suspended sentence for preparing a Molotov cocktail bottle. For both people, the verdict was passed, after they admitted guilt. The person who fired a firearm and waved a weapon at protesters in Skanderbeg Square during the protests against the French proposal was arrested and prosecuted for the crime of causing public danger and got a four-month prison sentence.

Dozens of citizens, who blocked the roadway Strumica - Radovish, as a revolt against the French proposal, received fines of 50 euros for moving on the road and 35 euros for a parked vehicle. The opposition evaluated such actions as pressure from the government and denial of their right to protest. With such actions, the people were intimidated not to protest and not to defend their country. The Ministry of the Interior responded to such accusations that they acted in accordance with the law, that they would stop holding of public gathering in the event that such gathering was in conflict

with the international agreements that stipulate the obligation for smooth flow of traffic, referring to Articles 2a and 4 of the Law on public gatherings.

The protests received extensive media coverage. All media houses and internet portals reported on the protests. The protests were covered daily in newspapers and news articles. The protests also raised public discussions among citizens, expert public and political structures. Discussions were conducted online on social networks, and there were also a number of TV debates. In terms of impact, the protest did not change the government's decision and they accepted the French proposal despite the protests. However, throughout the protests, the government and government officials had reactions and statements regarding the protests and demands. These statements were also covered by the media.

## Digital technology and social media

The following social media were used for the protest - Facebook, Twitter, YouTube and Viber groups. Facebook and Twitter were used to call citizens to be part of the protests and inform them about the messages being sent from the protests as well as for discussion about the content of the French proposal. Viber groups were used to organize the protests and people. YouTube was used to share videos of the speeches given by public figures, politicians and other citizens at the protests, but also to broadcast the protests live on the Internet. Mobile devices were widely used during the protests on site. They were often used to share videos of the protests themselves as they took place and to document events - especially the incidents and violence that occurred several times during the protests.

The way that the technology helped in this protest is that it was a tool for easier and more effective reaching out to citizens who shared the dissatisfaction with the content of the French proposal and calling and organizing them to be part of the protests. They also facilitated the sharing of information and messages from the protests, enabling citizens who were unable to be part of the protests physically to express their support for the protests in different ways using social media. The use of mobile phones and recording with them made it possible to see the real events of the protests and by sharing them on social networks refute the wrong transmission of news by both citizens and the media. The videos also helped shed light on incidents of violence at the protests.

Social networks also made it possible for the news about the protests to be spread outside the country, for like-minded people from the Macedonian diaspora to join and organize. There were attempts to discredit the protests after the incidents of violence and riots. Accusations and condemnations were made about the violent nature of the protests, and on the other hand, accusations were made that provocateurs were deliberately sent to provoke violence and ruin the credibility of the protests.

## Online v. Offline

The offline gathering was larger and appeared as more active. However, the actions and the narrative were made generally during the offline assembly. The messages of the protest were sent and shared largely during the online protest and online activities. Social platforms and digital technology were crucial tools for organizing and managing the protest. Also, for sharing the purposes of the protest and acquiring public attention and more protestors.

## Specifics

♦ Largest protest in the last year, which started spontaneously with the gathering of dissatisfied citizens, immediately after the presentation of the French proposal.

♦ The protest was supported by the opposition party and they rapidly took the main control over the organization and leadership of the protest using their social media platforms.

♦ Hate speech was often noted during the protest

♦ The protest offline included riots and few cases of violence

♦ Fake news - several cases of wrong or false information about the French proposal by certain internet media portals have been noted.

♦ Several cases reported of pressure by the government on the demonstrators and the protest itself. In addition, accusations were made on turning the network and internet off.[36]

♦ BOT profiles supporting the government and imposing a narrative that accepting the "French" proposal is something that brings progress and led the country towards Europeanisation.

## Case 2: Public room

### Overview of the protest

The initiatives for the protests started after testimonies from girls began to spread on social networks about the reactivation of the Public Room group on the "Telegram" Network, in which members share pornographic photos and videos, names, addresses, phone numbers and profiles of Macedonian girls. The group counts over 6,200 members and about 10,000 photos and videos are shared in it. The reactions were triggered when a 22-year-old girl with a video on Instagram told her story. Because of this, posts and expressions of outrage about the situation appeared on social networks. A wide discussion developed, with reactions from many public figures and civil society organizations. The citizens appealed to the police to take immediate measures and stop the abuse. Responsibility was also demanded from the creator and the members who share personal data of girls. Disgust at the existence of such a group was also expressed. There have been huge surges in the public and discussions not only on social networks but also through TV media with numerous debates and interviews.

Because of all these reactions, a Facebook group was created in February 2021 calling for a protest to express the revolt from the events related to the Telegram Public Room group. The group is named "Protest March - Public Room is a Crime". The protest started in the online space, through discussion, sharing of revolt and opinions, appeals for action, etc. By creating the group with a scheduled event for a protest with physical presence, the organization, promotion and recruitment of like-minded people was carried out through the group. The protest was digitally enabled - with discussions and organization on social networks, but also with the occurrence of a protest with physical presence on 02.03.2021, which was held at two locations, the Ministry of Internal Affairs and in front of the Public Prosecutor's Office.

---

[36] Accusations by Left activists that during the protests at 2 August celebration in Krushevo, the network and the Internet were turned off and cases with fines given to the participant protesting and blocking roads.

The Facebook group has over 2000 members, but in the discussions and appeals that took place on social networks, significantly more people were involved, twice as many. About 1000 people took part in the offline protest. Two hundred posts have been shared on the Instagram network with the hashtag #publicroom and #publicroomcrime, #notalone #telegram #sexualharassment.

## General information and characteristics

### How?

The protest started spontaneously with the avalanche of reactions, appeals and posts on social networks, and also in the media and in everyday life, after testimonies from girls began to spread on social networks about misuse of their photos and personal contacts on Telegram Group.  Because of those reactions, the protest was organized with physical presence, the organization of which was launched on a Facebook group and was initiated by a group of civil society organizations.

### Who?

The Platform for Gender Equality - a group of civil society organizations consisting of: Meduza, Tiit Inc., National Network Against Violence Against Women and Domestic Violence, Helsinki Committee for Human Rights, Network for Protection from Discrimination, Margin Coalition, Stella Network, Hera and HOPS were organizers of the first events and the entire initiative.

Participants/supporters of this protest were citizens of all ages and genders, but still, the most represented were women, more specifically women between the ages of 16 and 40. Several public figures, activists, lawyers, politicians, etc., participated and supported this protest. The number of supporters participating in the online protests was greater than those who came out to the protest with a physical presence.

### When and where?

Discussions on the issues covered by the protest began around the end of January 2021, with the testimony of one of the girls, a victim of the Public Room group, and then with several other testimonies. The protest with physical presence was held on February 3, 2021, but discussions and reactions continue until the end of 2021.

Considering the idea, the motive, and the messages and appeals expressed by the protest, it can be said that this protest has a national character. Citizens from all over the country participated and supported, although the majority of those who came to the protest with a physical presence was from Skopje.

## Messaging and measuring impact

The initial goal of the protest was to show solidarity and support all victims of the criminal group Public Room. According to the Facebook group where the protest is organized, the following messages have been sent:

- The Public Prosecutor's Office is requested to immediately and thoroughly clear the "Public Room" case, which is a crime in which a large number of women are victims of gender-based violence.
- Adequate punishments are requested for the administrators of the groups, as well as all members who sent and still send photos and write personal data of girls and women.
- It is requested and insisted that sexual harassment via the Internet be specifically regulated in the Criminal Code.

- Demand for appropriate care for the victims from competent institutions.

- A few detained members and damage repair will not silence the protest. The organizers are vigilantly monitoring the institutions and looking for comprehensive solutions for the prevention of gender-based violence.

- This case is a chance for the institutions to show that they stand for women's rights in practice, and not just declaratively. We must not allow a situation in which the victims increase, and the institutions remain silent and fail to perform their duties, because a state that does not act is a state that rapes!

The messages were shared in several ways, i.e. different formats: written messages and sharing on social networks, videos with addresses from various citizens and activists, videos of the protest itself, photos with the events of the protest and with banners from the protest, etc. Hashtags were also used.The messages about the protest were created by the organizers of the protest themselves, as well as by the participants. The number of banners with messages that the participants themselves created and shared at the protest with physical presence was huge. The number of addresses from the protest with video broadcasts in the media was also significant. Some people also shared their experiences as victims of sexual harassment. The messages from the protest were of a social nature.

The messages were sent/directed mainly to the Ministry of Internal Affairs, the Minister for Internal Affairs, and the Public Prosecutor's Office, the Public Prosecutor of the Republic of Moldova as well as the Council of Public Prosecutors - as the main actors who should protect women in such situations. However, the government and the assembly were also covered with requests for legal amendments to the Criminal Code, in order to make such harassment punishable.

No troll activity was observed, but a series of reactions were observed on social networks where the girls-victims of „Public Room" were condemned. Opinions were shared that girls sought it out for themselves by sharing explicit pictures or uploading explicit ones on social media.

Two guerrilla actions were also organized: the first one (05.03.2021) in front of the Public Prosecutor's Office - While the public prosecutors were arriving at work, they were greeted by boxes that simulated evidentiary material for the "Public Room" case at the front door of the Basic Public Prosecutor's Office. This guerrilla action, entitled "OJO is done at three and a half", for which the organizer "Equalis" emphasized that it was aimed at pointing out to the public prosecutors that there is sufficient evidentiary material in the "Public Room" case, but also that the failure to act, as they add, is complicity in the crime.

The second (03/04/2021) guerrilla action took place in front of the Ministry of Internal Affairs), where "Equalis" activists displayed the messages circulating in groups such as "Javna Soba". All the messages that were attached to the clothes of the activists were originally downloaded messages from the currently active group 'Public Room' and they were displayed without any significant interventions. The activists told the Ministry of the Interior that "Public Room" is a crime and that, behind this crime, there are damaged women and girls, who have to be protected by the state.

Hate speech and attacks on women with inappropriate comments have been reported on social media, especially on Twitter, Instagram and Facebook. In addition, threats to victims who decided to speak out about the abuses that took place in the Public Room group. Most of those who "attacked" hid behind fake profiles and pseudonyms, especially on Twitter.

It can be said that the impact of the protests and the actualization of this issue has been immense and led to certain changes in laws and actions of institutions. There was public discussion both among citizens

and among competent persons and institutions. The number of posts on social networks, and then discussions about the issue, was huge. Activists and civil society organizations grouped together and came out with their opinions, appeals and demands. Public figures, professors, lawyers, activists were active in the discussion and appeals on this issue. Almost all media houses, internet portals with news reported on the developments, initiatives and protests. The action had wide coverage. The issue was also covered on the central news. There were numerous TV debates and interviews with various people on these issues.

The appeals, demands and pressures from the protests caused an immediate reaction from the Ministry of Internal Affairs, where the Public Room group on Telegram was closed after two days of reactions in the public and on social networks, the news of which were shared with the public by the Minister of Internal Affairs personally through social networks. Very soon, four people were detained, and the Minister announced that the action of the Ministry of Internal Affairs in cooperation with the Prosecutor's Office should lead to the discovery of the creator of the group and all its members. There were speeches and reactions from the Prime Minister Zoran Zaev, the justice minister Bojan Marichich and the President of the State Stevo Pendarovski.

The protests led to the government passing amendments to the Criminal Code, which strengthen the protection of women. The minister emphasized that with the implementation of the Istanbul Convention, the protection of women has been legally specified and new crimes that did not exist before have been included, and with this women are legally protected from harassment and attacks. A new act "Stalking" has been added, which foresees strict sanctions for harassment also on the Internet, something that recently happens more frequently.

As a result of public pressure and pressures, after the instant finding of the people responsible for the public room group and their arrest, the creator and the administrator of the group were sentenced to 4 years in prison, due to the production and distribution of child pornography. However, the cases with the Public Room 2 group are still in pre-trial proceedings due to non-cooperation of TELEGRAM with the Macedonian Ministry of Internal Affairs and the Prosecutor's Office. For three whole months, the Telegram social network did not respond to the request and did not provide the real data on the user profiles of the creators, administrators and members of the Public Room 2 group. Despite the fact that the request of the Prosecutor's Office through the Ministry of Internal Affairs was sent on January 27, 2022, the Public Prosecutor's Office in Skopje did not receive a response to the request for the data the prosecutors need to determine the identity of those who misused data, published photos of naked girls, personal data, addresses, phone numbers, profiles on social networks.

## Digital technology and social media

Facebook, Instagram and Twitter were the most used social networks for this protest. Nevertheless, TikTok, Viber and WhatsApp were also used. The latter mostly for organization. Widespread public discussion, posts, messages and appeals took place on Facebook, Instagram and Twitter. The Facebook group was used to recruit like-minded people, organize the protest and spread the messages that were shared at the protest with a physical presence. It must be noted that the whole avalanche of reaction and beginnings of the protest started because of a video address posted on Instagram by one of the victims of the Public Room group who decided to speak out.

Mobile phones were used for communication, recording video messages, conveying the atmosphere of the protest as well as for communication and coordination. Cameras were also used to create photographs to share the atmosphere of the protest and convey the messages of the banners displayed at the protest. A video was also produced as a sexual harassment awareness campaign by Vidi Vaka.

## Online vs. Offline

In this case, the online and offline protests were really similar in dynamics, numbers and messages. Of course, the support and number of online protests was greater, due to the advantage that people can give support and send messages regardless of which part of the country they are in. Both protests were intertwined and equally important and jointly contributed to raising public awareness, putting pressure on institutions and making changes. Without the online discussion and proactivity, the spreading of the voice, there would not have been a protest with a physical presence and wide media coverage of all the developments related to the protest and the events that led to the protest. The protest with physical presence and guerrilla actions also contributed to the messages reaching the institutions and the concerned persons more intensively, as well as to the protest being transmitted throughout the region.

### Privacy protection of the participants

On the Facebook group where the protest was organized, a post was shared warning the organizations organizing the protest to check their web pages and contact e-mails, that they have not been hacked. It is pointed out that there is a risk of web pages being hacked and e-mail addresses being changed, for example if there is a Latin "a" in the address it will be replaced with a Cyrillic "a", which is the same visually, but not the same in the ICT world, and in this way communication with the supporters of the event can be disabled. Organizations that have noticed such thing are invited to report it to the Ministry of Internal Affairs.

### Media and journalist involvement

Journalists actively followed the protests and regularly and intensively streamed and reported on all the events and developments related to the theme of the protest without any incidents or obstacles. Activists were also actively involved in protest, organization and sharing and made a particular contribution to raising public awareness and pushing for changes in the institutions concerned.

## Specifics

♦ The protest and the reactions started as a result of a video address posted on Instagram by one of the victims of the Public Room group who decided to speak out.

♦ Huge reactions and discussion on the social media platforms, media and among the citizenship

♦ Majority of the involved in the protest (online and offline)- women

♦ Attacks on social media toward the victims of the Public Room group, generally from fake or pseudonym profiles.

♦ Guerrilla actions for drawing the attention of the concerned institutions to act, organized by using Facebook groups.

- Addressing and appeals from all the high-level officials- Prime minister, President, Minister for Internal Affairs, Minister for Justice

- Huge impact of the protest and success with accomplishment of some of the demands of the protest. Laws were amended as a result of the protest.

- Immediate reactions by the MoIA and Public Prosecutor Office, as a result of the protest and the public pressure.

- Accusations of alleged hacking attacks on Facebook groups and e-mail addresses of the organizers (no official proof).

- Telegram not collaborating with the official institutions from N. Macedonia - the Public Prosecutor did not receive a response to the request for the data that the prosecutors need to determine the identity of those who misused data, published photos of naked girls, personal data, addresses, phone numbers, profiles on social networks

## Case 3: Health before profit

### Overview of the protest

The protest started as an answer to the public discontent over the announced plans to build three skyscrapers at a prominent site in the center of Skopje. The reactions of revolt and dissatisfaction of the public were instant. The number of reactions and discussions on social networks was large. Many public figures, architects and other experts, as well as representatives of political parties, came out with their views and comments. Shortly after, a citizen's initiative was launched to collect signatures - a petition, where 5000 signatures were collected in just one day. A petition was launched on change. org which was signed by 11,260 people. In the period from February to April 2021, the civic initiative Chance for Centre organized a campaign on social networks where public figures and prominent citizens answer questions about the space around the Holiday Inn parking lot, generally about the state of urbanism in Skopje and raising public awareness about issues of urbanism and environment in Skopje, including the situation with the announced constructions at the Holiday Inn. The campaign was carried out on Facebook, Instagram and Twitter. The posts are also shared on the "HEALTH BEFORE PROFIT" Platform, which was created by a group of citizens of Debar Maalo and Center Neighborhood and aims to drastically improve the quality of life of citizens in the Municipality of Centre.

On December 1st, a group was opened on Facebook and an initiative was launched to hold a protest entitled "Protest!! Stop for high-rise buildings in the centre of Skopje". The group has 596 members. The civic initiatives Green Humane City (Zelen Human Grad) and Chance for Centar appear as the creators of the group.

### General information and characteristics

#### How?

The protest began with the launch of the petition to collect signatures and the revolt that was expressed on social networks. Which means the first steps were spontaneous reactions. The protest itself with physical presence was held months later, after a long period of discussions and debates on social networks, on TV and through the media as well as various campaigns. The following hashtags were used by participants in these protests. #healthbeforeprofit #shansazacentar #DaSiGoVratimeSkopje #SkopjeMoraDaDiše.

### Who?

The civil initiatives Green Humane City and Chance for Centar are the official organizers of the first and the entire initiative. GREEN HUMANE CITY is a joint initiative of 22 organizations and activist groups from Skopje with 2 representatives in the Council of the City of Skopje.

Participants in these protests were primarily citizens of the municipality of Centar and the city of Skopje. However, many citizens from all over Macedonia of different genders and ages gave support to these protests. Participants were also public figures, professors, architects, experts from the field of construction, civic organizations, activists, etc. The number of supporters participating in the on-line protests was greater than those who came out to the protest with a physical presence.

### When and where?

Discussions around the issues covered by the protest began with the campaign sometime in February 2021. Then, there was a wider public debate and reactions on social networks after the media at the beginning of April. The petition to collect signatures and the public call to the Prime Minister also took place during the month of April. The protest with physical presence took place on 6 December 2021, for reasons that none of the demands and appeals of the citizens were met.

Considering the idea, the motive and the messages and appeals expressed by the protest, it can be said that this protest has a local character. The protest covers a topic that is important for the residents of the municipality of Centar, but also for the city of Skopje at the same time. However, if we consider the participants, there was support for the protest from all parts of Macedonia.

## Messaging and measuring impact

The messages that were sent from these protests were very different: 1) To stop the procedures and construction activities related to the parking lot of the Holiday Inn due to suspicions of corruption and abuse; 2) Pronouncing and taking measures by the Public Prosecutor following the initiative of the State Commission on Corruption; 3) Suspension of the implementation of the DUP (Detailed Urban Plan), to stop the construction urbanism etc.; 4) Also, messages to put health before profit, to return the city of Skopje, to let Skopje breathe and to protect humane living in Skopje. "Clean air from concrete is not good" and "How much air do we have left" - the messages were mainly social. Isolated cases of political blame shifting were observed, where the major political parties shifted the blame to each other.

Hate speech, misinformation and information from questionable sources were not observed during these protests.

The messages of the protests were conveyed in several ways: through posts on social networks, through campaigns, through petitions, through public calls to office holders and institutions, through debates and discussions on TV and social networks, etc. The messages were transmitted through video messages and videos of the protests with physical presence, presence on television, through banners, photographs of the protests themselves and photographs prepared with written messages and shared on the networks (campaign). The following hashtags were used for the protest: #здравјепредпрофит #шансазацентар #DaSiGoVratimeSkopje #SkopjeMoraDaDiše. The messages were created by the organizers, but also by the participants and supporters themselves.

The messages were addressed to the following institutions: Municipality of Centar, Mayor of the Municipality of Centar, Council of the Municipality of Centar, Mayor of the City of Skopje, Council of the City of Skopje, Minister for Transport and Communications, the Government, the Ministry of Environment, the Public Prosecutor's Office and the State Anti-corruption Commission.

Group of civil society organizations, university professors and architects made a public call to Prime Minister Zoran Zaev to support the suspension by the Municipality of Centar of the Detailed Urban Plan CO8 (the parking lot opposite "Holiday Inn"), and other DUPs non-compliant with the General Urban Plan. In the request, the Ministry of Transport and Communications and the City of Skopje, as well as other competent institutions, are called upon to declare and undertake that they will not issue consents to DUPs that are not in compliance with the GUP. The Public Call points out a series of arguments why the DUP at "Holiday Inn" is disputed. About 40 civil society organizations, architects and university professors stood behind the public call.

In the period from February to April, the civic initiative Chance for Centar organized a campaign on social networks where public figures and prominent citizens answer questions about the space around the Holiday Inn parking lot, generally about the state of urbanism in Skopje and raising public awareness about issues of urbanism and environment in Skopje. The campaign was very successful and received huge support.

The protest can be said to have had a somewhat impact and generated an avalanche of reactions, discussions and debates and updated the topic of the controversial construction of high-rise buildings at the Holiday Inn, but the construction of the building has not been stopped.

Reactions and statements about this issue in response to the protest were given by several institutions and several public figures and experts - the Prime Minister, the Minister for Transport and Communications, the Mayor of Centar, the Mayor of Skopje, representatives of political parties, etc. There was a large number of TV debates on this issue. The initiatives of the protest and the issues were covered by almost all television/print media, internet portals with high coverage and topicality. The discussion on social media was also intense, with posts and reactions from many people.

The protest and the actualization and reactions on this issue managed to exert a certain influence on the institutions, to revise and review certain decisions and issues, even to put certain actions on hold, but still the planned construction of the high-rise buildings in the parking lot of Holiday Inn was not completely stopped.

---

### Counter-demonstrations

The citizens of the small neighbourhood where the high-rise buildings are to be built - Novomaalci - made a counter-protest to the protest of "Green Humane City" and "Chance for Centar" to stop the construction of high-rise buildings. A group of citizens who live in the area where the "Grand" complex was to be built reacted to the demands of the organizers of the initial protest, considering that they are putting pressure on institutions such as the Basic Public Prosecutor's Office, the Center Municipality and the State Commission for the Prevention of Corruption. Novomaalci publicly supported the project and opposed the initiatives that demanded the cessation of construction activities.

These citizens mainly gave their reactions and messages through addresses, announcements to the media, interviews and letters to the media. Phones and Viber and MSN groups were used for grouping and joint performance. Certain posts and addresses and appeals of the residents of Novo Maalo were noted on the social network Facebook. There was no typical hate speech, but some threats were made. The counter-protests in no way had an impact during the protests against the construction of high-rise buildings, in the sense of hindering each other.

### Digital technology and social media

The following social media were used for the protests - mainly Facebook, to a lesser extent Twitter, Instagram and Viber groups. Expression of opinions and recruitment of like-minded people mainly took place through the Facebook and Twitter community. The organization and planning of activities were carried out through MSN, Viber groups and email communications. Mobile phones were used for communication, recording video messages, broadcasting the protest as well as for communication and coordination. Facebook groups and other social media were used to collect proposals, support and promote the protests.

### Online vs. offline

Greater support and discussion were observed during online protests where more people participated compared to on-site protests where only a small number of citizens attended. The messages and appeals were the same in both online and offline protests. It can be concluded that all the pressure and attempt to influence was given through online protests. The protest with physical presence was only the last step and a tool of influence and expression of discontent and appeal that was used.

### Specifics

♦ The protest started from citizens' initiative to collect signatures - a petition against the construction of the three skyscrapers.

♦ The online protest was more active and successful.

♦ It had local character- citizens of the Municipality of Centar district in Skopje. But, it received support also from citizens of Skopje and N. Macedonia in general.

♦ Successful online campaign through the social media network for raising awareness with public figures involved

♦ Huge involvement of the professional public and civil society organizations in the organization of the protests, its demands, but also in the actions and in the raising awareness process.

♦ Counter-protest was organized to react to this protest.

♦ It provoked a huge public discussion on the national level for similar problems regarding the urbanism plans and construction expansion.

## Case 4: Assembly against the proposed Anti COVID-19 measures: - "Stop taking away our liberty".

### Overview of the protest

The "Stop Taking away our Liberty" assembly is a protest triggered by the introduced government measures to prevent the corona virus, which the authorities introduced due to an increase in the number of people infected with this virus. The protest was initiated on social networks with

an announcement for a protest with physical presence that was held later. The protest began as a response to the announcements of the entry into force of a new law that as of 16 August 2021 introduced a mandatory confirmation of immunization, for at least the first dose, with mandatory orderlies for controlling the presentation of proof of vaccination when entering any type of facility. The same applied for catering facilities, with more than 30 people present for an event (celebration, concert, seminar, training, workshop, conference, cultural or sports events). The organizers sent a message that the law curtailed their basic human rights and violated their freedom of choice.

The initiative to start protests began on 7 August, when an event was created on the FACEBOOK network entitled "I'm not a sheep to exploit me", and a day later the event "STOP Deprivation of Freedom", where citizens are invited to express their dissatisfaction against the announced intro-duction of anti-covid measures with a call to protest with physical presence on 15 August 2021, and then on 19 August 2021. The creators of these two Facebook groups reconciled and merged later. The organizers of these two groups have Facebook profiles, with both using pseudonyms, without full names and surnames. One group has a number of 2900 people, while the other has 6600 mem-bers. About 5,000 people participated in the protests with physical presence (individually for each protest).

## General Information and characteristics

### How?

The protest arose spontaneously, with the opening of Facebook groups and a call for a protest with physical presence, prompted by the discussions and revolt on social networks and in live that appeared among a group of citizens due to the announced anti-COVID-19 measures. Three Face-book groups with the same motive were opened, later the organizers of the groups worked together.

### Who?

According to Facebook posts and groups, three organizers, two men and one woman, have been registered. The men are under pseudonyms and cannot be found by full name and surname with a Facebook profile, while the woman is with a first and last name and a Facebook profile. However, in the protests with a physical presence, the identity of the organizers was known, and they met and communicated with the rest of the protestors. The full name of one of the male organizers is men-tioned in the press posts. So, the organizers were well known to the people that attended the offline protests. Regarding the participants, they were citizens of different ages, genders and ethnicities, like-minded people, who expressed their revolt against the government's anti-COVID-19 measures and the denial of their rights. It can be seen from the Facebook groups that the citizens who ex-pressed their revolt come from different cities throughout Macedonia. There was also local protest in Strumica, as a result of this movement.

### Where and when?

The Geographical scope of the protest is national and based within the borders of Macedonia. The specific problem is national. Although protests around government anti-covid measures were organized in many countries of the world, during that period. The protest or protest initiative started on 07.08.2021 on social networks through Facebook groups and lasted until 19 August .2021 when the last protest with physical presence was held. Preparations started on 07 August 2021 through social networks. The first protest with physical presence took place on 15.08.2021, and the second on 19 August 2021.

## Messaging and measuring impact

The main messages sent by the protests were 'My body is my choice' and 'Stop forced vaccination' Freedom of choice', 'No to vaccination', 'We want freedom' 'We don't want to be slaves', given like a response to the restrictive measures that entered into force, and which imposed restriction for entry into catering facilities, closed facilities and indoor events for the unvaccinated. Citizens believed that the restrictive measures threaten their right to life, freedom of movement, right to privacy and right to choose.

The messages were mainly social, but political messages could also be noticed. In the posts of Facebook groups about the protests, a significant number of comments contain hate speech and insults. Some posts with misinformation or information from dubious sources have also been noticed. Hate speech was also present at one of the protests with physical presence, which created resentment among the majority of the protest participants, and arguments and conflicts arose at the protest itself. Some of the speakers were booed and condemned for expressing views that were not the views of the people who came out to protest for their freedom. The people who expressed hate speech as speakers at the protests are known in the public as anti-vaxxers.

The messages from the protests were transmitted in different ways: through text-posts on social networks, through video messages and videos from the protests with physical presence, through banners, photos from the protests themselves and photos prepared with written messages and shared on the networks. The hashtag #MyBodyMyChoice and #fightthepower were used for the protest, but in very small numbers. The messages were created by the organizers but also by the participants themselves. There was a surge of posts by several individuals on the Facebook groups, with abusive and repetitive hate speech posts, which could be interpreted as an attempt to destroy the credibility of the protest. Divisions among participants, decrease in turnout. And on the Facebook page that calls for the protest, people react that certain attitudes create hatred and division and delegitimize the protest. There were accusations of bribes, politicizing the protest, both by the government and by the opposition.

The protests were aimed at the government and government officials, but also at the citizens of the Republic of North Macedonia who share the revolt from the introduction of the restrictive anti-covid measures. The Prime Minister, the Minister for Health, the President of the Infectious Diseases Commission, the Minister for Economy were called for answers and actions by the protesters.

In terms of impact, the protest failed to bring the desired changes and prevent the introduction of anti-covid measures. However, the protest succeeded in raising the discussion about the anti-covid measures and their legitimacy and had influence among the citizens. There were reactions from the political parties and the competent institutions, i.e., officials such as the Minister for Health, the President of the Commission for Infectious Diseases, the Government, the Minister for Economy, and certain public figures. Regarding the media coverage of the protest, it can be said that it was small and only a few TV houses and web portals reported on the protest. Most of the reports were more about the negative context - i.e.. The hate speech and insults that happened to the protesters during the protest with physical presence. The discussion on social networks on the topic increased, but so did the confrontation between citizens.

## Digital technologies and social media

The following social media platforms were used for the protests - mainly Facebook, to a lesser extent Twitter and Viber group. The organizing process, opinions sharing, and suggestions mostly

happened on Facebook groups. Mobile phones were also used to post videos of the protest, to stream live videos of the protest, and for communication and coordination. The two main tools for promoting the protest were Facebook and cell phones.

The digital technology and platforms helped promote the protest and gain a larger group of followers who expressed their revolt through Facebook groups. The advantage is that the messages and the initiative reached citizens from the entire territory of the Republic of North Macedonia, and citizens who could not be present at the physical protest also had the opportunity to give their support. Facebook groups in this case helped for greater coordination, sharing of opinions, joint decision-making through votes important for the maintenance and course of the protest: message planning, joint action, scheduling, etc.

A challenge in using the platforms is the attempts of negative comments in the Facebook groups, fake news and attempts to discredit the protest. The need for engagement of the organizers to monitor such cases and to deal with and eliminate or mitigate the consequences of such attempts was necessary and obvious.

The reputation of the protest was damaged and the number of people who gave support and wanted to go to the protest with a physical presence dropped after the first protest and the incidents of hate speech and insults by several participants - shouting "killers, killers" for the doctors. The news about these events of the protest was partially reported with an emphasis only on these incidents, thus there was a lot of misinformation that tarnished the image of the protest.

## Online vs. offline

The number of people was certainly higher during the online protest, than during the offline protest. However,  the turnout was solid even during the first protest with physical presence  The larger number of participants at the online protests is a result of the fact that people from all over the country who were not able to be at the protest with a physical presence joined the initiative online. The messages were almost the same, with the fact that more cases of hate speech by individuals were noted at the protest with physical presence. Attempts to damage the reputation happened both on the live protest and on the Facebook groups, however, on FB group things could be more controlled.

### Media and journalist involvement

Journalists were not prevented from observing the protest and reporting, but they received vulgar messages, rude insults and threats from some of the participants at the protests on several occasions. Hate speech directed toward the doctors, but also towards the journalists was detected at both, offline and online, protests. The Medical Chamber reacted to this kind of speech with a warning that hate speech is a crime that could be sentenced with imprisonment under the Criminal Code, and emphasized that they would submit reports to the competent institutions should such speech continued. The reaction of the Chamber followed after a group of citizens appeared at the protest, with various offensive banners and chants "They are not doctors, they are murderers!" Killers, killers!"

The Association of Journalists of Macedonia also came out with a reaction and asked the Ministry of Internal Affairs to guarantee the safety of the present journalists, photojournalists and videographers, at the protests held against the new anti-COVID measures. This reaction followed after vulgar messages and rude insults sent to journalists at the protest by a group of citizens,

thus indirectly endangering the safety of journalists and cameramen who were present to cover this event. The anonymous speakers of this protest not only threatened the safety of media workers through their speech, they also encouraged the crowd present to participate in disparaging the journalists. The association stated that the journalists officially present at public protest for coverage are there on a work assignment for the public interest and the right to information. Violation of their security by public events also denies the right of citizens to be informed.

## Specifics

- Started from sharing thoughts of dissatisfaction on the COVID-19 restrictions by the government with post from few people on Facebook- continued with creation of Facebook group and calling for protests by few of those people and ended as a civil protest with physical presence. It is specific that the protest manage to maintain the strict non-political perspective, keep the civil, amateur, spontaneous, component, even though there were attempts for politicizing the protests.
- Noticed hate speech, threats and insults towards the doctors and the journalists.
- Noticed provocations by bots on the social media platforms with attempts to ruin the credibility of the protest and share hate speech.
- Reported provocateurs during the offline protest who damaged the reputation of the protest with spreading hate speech.
- The Facebook group was used for democratic decision-making process through voting by the members of the group for the important decisions regarding the protest and its manifestation.

# Conclusions & Policy Recommendations

## i. Conclusions

**Since the early 2010s the country joined the global trend and has seen a significant increase of use of internet, social media and messaging apps as a means for awareness raising for certain issues of public concern, as tools for mobilizing supporters into action and as a forum for debate on burning societal topics.** In the past decade, there has been no assembly/protest without at least some degree of use of new technologies and social media. Since it is a relatively new phenomenon, related directly to realizing one of the basic human rights, the right to peaceful assembly, it is of utmost importance that these assemblies (DMAs) are closely monitored. The findings of this research have shown the monitoring enables early identification of potential risks and challenges (in law and policies) in the enjoyment of the right to peaceful assembly.

Monitoring DMAs in N. Macedonia faces some specific challenges, especially in the data gathering process. In order to determine the number of cases the police have requested removing content or specific profiles on social media we've requested data from the Ministry of Internal Affairs (Police) in the form of freedom of information request. Unfortunately, instead of providing us the data, the Ministry referred us to request such data from the social media platforms.

Similar challenge is the lack of transparency & accountability of the big tech companies (e.g., in providing data on removal requests). The data provided and publicly available by the tech companies operating the social media platforms is incomplete and published to limited extent. The tech companies should publish a desegregated data on the requests issued by law enforcement agencies depending on the type of request, the legal ground (privacy, hate speech, threats etc.) as well as whether those requests were related to specific civic initiatives.

The DMAs as specific form of assemblies are not recognized as such by the legislation and this bears an inherent risk of restrictive interpretation of the general rules on assemblies, privacy and data protection. The general rules on privacy, data protection, gathering evidence apply. This lack of specific protections of DMAs in the general legal framework might lead to a dis-proportionate approach and misuse of evidence by institutions. Some improvement was made in incriminating specific actions conducted in the digital world (Criminal Code). The procedural laws regulating the criminal procedure and the authorities and powers of the police are still legislated in general terms, without duly consideration of the specifics of the digital world. For example, the manner of regulation of gathering data, collecting evidence, with very limited exceptions, does not include specific procedural safeguards that will ensure that the rights of citizens in the digital world will not be violated.

The findings of the monitoring show that governmental interference in the DMAs subject to this report was not reported nor identified. There were no publicly available reaction from DMAs organizers or participants that there were attempts to prevent the DMAs, to interfere with commu-nication or to block access to internet. These conclusions should be cautiously interpreted since governmental interference is potentially possible event without awareness of the DMAs organizers.

The DMAs in N. Macedonia are predominantly digitally-enabled. They are taking place in physical spaces and facilitated by digital technologies. The discussions on social networks spark an initiative for broader public protest for specific issues. The protests start on-line but often are moved on the streets and squares. Social media platforms and messaging apps are commonly used for organization and promotion of the protest.

The impact on public mobilization of DMAs is significant. The use of social media galvanizes the public and triggers a quick reaction. Though beneficial for spreading information and informing the public, this characteristic can be easily misused and manipulated either by political parties, trolls or other individuals or groups.

The impact of DMAs on policy and decision-making is still limited. The DMAs are vulnerable to quick change in the context (e.g. new scandal, accident, crises etc.) which can result in significant decrease of the public focus and attention on particular topic. The DMAs are gaining momentum, but for greater impact, they are still combined with conventional protest.

There is a strong ideological division between the different types of DMAs that happened in N. Macedonia. On one side there are the DMAs related to women's rights, rights of LGBT population and protection of the environment, while on other side are the DMAs related to patriotic and nation-alistic sentiments, anti-establishment and anti-EU setting. There are differences in how these two

types are organized on-line. While for the first type the organizers are usually public, for the second type they are often hidden behind nicknames or pseudonyms. The organizers and participants at the 1st group are victims of hate speech and threats while that is not the case with the 2nd group. This division has also an impact on the monitoring. Scheduling interviews and communication is much easier with the 1st group, which is not the case with the 2nd group.

## ii. Policy recommendations

1. The Ministry of Internal Affairs and other law enforcement agency with authority to seek information and block content from social media platforms and IT companies should ensure this is done in a transparent manner by providing statistical information about such requests without jeopardizing the confidentiality of pre-investigative procedures and personal data.

2. The Public Prosecution should take active measures to investigate and prosecute all potential allegations for violation of the rights to protest in the digital world as well as to conduct a supervision of the actions taken by the Police and other agencies upon its request.

3. The right to protest applies equally online and offline. The right to freedom of assembly and association is enshrined in Article 11 of the ECHR. The case law established by the ECtHR regarding the protection of political speech should be guiding principle in determining policies in the area of the rights on the internet.

4. The recognition of the right to peaceful assembly imposes a corresponding obligation on states parties to respect and ensure its exercise without discrimination. This obliges states to allow such assemblies to take place without unwarranted interference, to facilitate the exercise of the right, and to protect the participants.

5. The legislation on communication and intercepting communication must provide effective safeguards against abuse of surveillance technologies which can infringe on the right to privacy and other rights of participants and bystanders and have a chilling effect.

6. The country should refrain from blocking or hindering Internet connectivity in relation to peaceful assemblies. The same applies to geo-targeted or technology-specific interference with connectivity or access to content. It should ensure that the activities of Internet service providers do not restrict assemblies or violates the privacy of assembly participants.

7. The country should ensure that civic initiatives should be able to be conducted using IT tools. This could be done by amending the Law on Referendum and other forms of direct democracy and introducing an on-line system for e-democracy and e-participation.