

2026 Rule of Law Report - targeted stakeholder consultation

Fields marked with * are mandatory.

Introduction

The annual Rule of Law Report lies at the centre of the Annual Rule of Law Cycle, which acts as a preventive tool, deepening multilateral dialogue and joint awareness of rule of law issues. So far, six editions of the Rule of Law Report have been published since 2020.

As every year, the Commission would like to invite the stakeholders to provide contributions to the 2026 Rule of Law Report. On the basis of these contributions and on-going developments, further targeted questions may be shared at a later stage of preparation of the 2026 Rule of Law Report, in particular in the context of country visits, or bilateral contacts.

The Commission invites stakeholders to provide contributions which include:

(1) developments and measures taken in relation to the recommendations in the 2025 report,
(2) developments related to topics covered in the 2025 country chapters, as well as any other new developments related to the rule of law.

The input should consist of a short summary, if possible in English, covering the areas referred to below. Legislation or other documents may be referenced with a link. Contributions should focus on significant developments since the last Rule of Law Report both as regards the legal framework and its implementation in practice.

This questionnaire also integrates the separate questionnaire on the single market from last year. In addition to these specific questions, respondents to the questionnaire are invited to consider the Single Market dimension, including any relevant cross-border issues, in all their answers.

Where questions of particular relevance under the single market dimension, this is indicated before the relevant question.

[1] Unless the information was already submitted in the input for the previous Rule of Law Reports.

Type of information to be included:

Under each of the four pillars, the replies should include references to the following types of information:

A) Legislative developments

- Newly adopted legislation
- legislative drafts currently discussed in Parliament
- legislative plans envisaged by the Government

B) Policy developments

- Implementation and enforcement of legislation
- evaluations, impact assessment, surveys
- white papers/strategies/actions plans/consultation processes
- follow-up to reports/recommendations of Council of Europe bodies or other international organisations
- important administrative measures
- generalised practices

C) Developments related to the judiciary / independent authorities

- important case law by national courts
- important decision/opinions from independent bodies/authorities
- state of play on terms, nominations and expired mandates for high-level positions (e.g. Supreme Court, Constitutional Court, Council for the Judiciary, Prosecutor General, heads of independent authorities included in the scope of the request for input[2])

D) Any other relevant developments

- National authorities are free to add any further information, which they deem relevant; however, this should be short and to the point.

Where relevant, please also indicate whether the developments reported are linked to the implementation of reforms and investments under the national Recovery Resilience Plan. To simplify your answers to the questionnaire, if there are no developments, it is sufficient to indicate this and the information covered in the contributions for the previous Rule of Law Reports does not need not be repeated.

[2] Such as: media regulatory authorities and bodies, national human rights institutions, equality bodies, ombudsman institutions, supreme audit institutions and, where they exist, transparency authorities.

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☒ Civil society organisation/NGO
- ☐ International organisation
- ☐ Judicial association or network
- ☐ Media organisation or association
- ☐ Public authority or network of public authorities
- ☐ Other

* Organisation name

250 character(s) maximum

Nyt Europa

Main Areas of Work

- ☐ Justice System
- ☐ Anti-corruption
- ☐ Media Pluralism and Freedom
- ☒ Checks and Balances
- ☒ Other

If "Other", please specify

Civic space and fundamental rights

Please insert an URL towards your organisation's main online presence or describe your organisation briefly:

500 character(s) maximum

<https://www.nyteuropa.dk/>

Transparency register number

Check if your organisation is in the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making

853288293883-30

* Country of origin

Please indicate the country of origin of your organisation

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☒ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Other - please specify

First name

Surname

Email Address of the organisation

nyteuropa@nyteuropa.dk

* Publication of your contribution and privacy settings

You can choose whether you wish for your contribution to be published and whether you wish your details to be made public or to remain anonymous.

- ☐ Anonymous - Only your type of respondent, country of origin and contribution will be published. Organisation name, URL, transparency register number, first name and surname given above will not be published. **To maintain anonymity, please refrain from mentioning the name of your organisation and any details from which your organisation can be identified in the rest of your contribution as we will not be able to guarantee anonymisation of these elements.**
- ☒ Public - Your personal details (name, organisation name, transparency register number, country of origin will be published with your contribution).
- ☐ No publication - Your contribution will not be published. Elements of your contribution may be referred to anonymously in documents produced by the Commission based on this consultation.

☒ I agree with the personal data protection provisions.

[Specific privacy statement targeted stakeholder consultation 2026 rule of law report.pdf](#)

Questions on horizontal developments

In this section, you are invited to provide information on general horizontal developments or trends, both positive and negative, covering all or several Member States. In particular, you could mention issues that are common to several Member States, as well as best practices identified in one Member State that could be replicated. Moreover, you could refer to your activities in the area of the four pillars and sub-topics (an overview of all sub-topics can be found below), and, if you represent a Network of national organisations, to the support you might have provided to one of your national members.

Overview topics for contribution

[List of topics for contribution.docx](#)

Please provide any relevant information on horizontal developments here

5000 character(s) maximum

Two horizontal developments are important to highlight in 2025, and it is in line with the developments from 2024:

SHRINKING CIVIC SPACE AND A CONTINUING HARSH TONE FROM THE GOVERNMENT AND POLITICIANS

Despite Denmark's relatively strong tradition of protecting civil society, developments in 2025 indicate a growing restriction of civic space and a deterioration in the sense of security and inclusion for several actors. In particular, activists working on climate, gender equality, and Palestine-related issues have been increasingly exposed to online harassment and smear campaigns, contributing to a more hostile public environment. Minority groups continue to encounter disproportionate obstacles when exercising their fundamental rights. Furthermore, administrative practices have exacerbated this uncertainty, as illustrated by cases where municipalities denied Palestinian solidarity groups access to public venues. These measures, combined with ongoing political debates that call into question Denmark's adherence to international human rights standards, signal a broader weakening of the safe, inclusive, and enabling environment necessary for equal participation in democratic life.

3d7754_87c9c78chttps://www.nyteuropa.dk/_files/ugd/3d7754_87c9c78c80314c29b7ec7818601a6f9b.pdf

3d7754_87c9c78c80314c29b7ec7818601a6f9b.pdf
Seksuelle minoriteter lægger bånd på sig selv i den offentlige debat | Institut for Menneskerettigheder

3d7754_87c9c78c80314c29b7ec7818601a6f9b.pdf
Seksuelle minoriteter lægger bånd på sig selv i den offentlige debat | Institut for Menneskerettigheder

DEFUNDING OF CIVIL SOCIETY

Access to funding for civil society in Denmark has become increasingly restricted, raising concerns about the sustainability and independence of civic actors. Although public and private funding mechanisms remain in place and political support for civil society has traditionally been strong, recent developments have undermined the predictability and neutrality of funding. Many CSOs, particularly smaller organisations, report limited or no access to core funding, forcing them to prioritise organisational survival over long-term democratic engagement.

Funding schemes have also become more conditional and administratively burdensome, with increasing expectations that organisations align their work with politically prioritised agendas. More alarmingly, the distribution of public funding lacks transparency and has been subject to political pressure, with high-profile debates and statements in 2024 and 2025 suggesting that CSOs engaged in advocacy, litigation, or politically sensitive issues should be excluded from public support.

<https://dm.dk/forskerforum/magasinet/2025/forskerforum-nr-2-2025/fonde-skaber-ulighed-milliardkloeft-i-fondsmidler-deler-universiteterne/>

<https://www.altinget.dk/civilsamfund/artikel/k-vil-tage-offentlig-stoette-fra-ngoer-der-sagsoeger-staten>

https://www.linkedin.com/posts/amnesty-international-denmark_k%C3%B8benhavn-kommune-vil-bestemme-hvad-borgerne-activity-7290342902566707204-RV-o/?utm_source=share&utm_medium=member_desktop&rcm=ACoAAEz3PWQBjLGy1txzlffeYdZAKgv9QhDyP7M

CRITICAL STANCE REGARDING INTERNATIONAL CONVENTIONS

In 2025, Denmark publicly signalled a shift away from its longstanding commitment to international conventions, marking a significant change in its political orientation. Political debates and statements increasingly questioned

the relevance and legitimacy of international conventions and court rulings, and openly discussed the possibility of limiting or withdrawing from such commitments. While Denmark continues to comply with EU law, this growing scepticism towards international legal frameworks reflects a broader recalibration of how the state understands its obligations under international human rights and legal standards as a member of the international community.

<https://jyllands-posten.dk/politik/ECE18816996/venstre-er-klar-til-at-traede-ud-af-international-konvention/>
<https://stm.dk/presse/pressemeddelelser/2025/statsministeren-og-italiens-premierminister-i-aabent-brev-vi-skal-kigge-paa-konventionerne/>

Questions for contribution

Under each pillar, you are invited to provide information on measures taken to implement the recommendations addressed to the Member State in the 2025 Rule of Law report, as well as developments with regard to the points raised in the respective country chapter of the 2025 Rule of Law Report and any other significant developments since January 2025 and up to the date of submission^[3]. Please always include a link to and reference relevant legislation/documents (in the national language and/or where available, in English). **Significant developments** can include challenges, positive developments and best practices, covering both legislative developments or implementation and practices.

Information provided in reply to the first question under each pillar, related to the follow-up to the recommendations, does not need to be repeated in subsequent parts of the questionnaire, but can be cross-referenced in the subsequent questions, where relevant. All other questions are not limited to the recommendations, but as in previous years, cover the entire scope of the Report.

^[3] Unless already covered in the input for the previous Rule of Law Reports.

Member State/enlargement country covered in contribution [only one choice possible]

If you wish to submit information concerning several Member States/enlargement countries, please fill in the questionnaire separately for each country. There is no limit to the number of contributions submitted by a single participant.

- ☐ Albania
- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☒ Denmark

- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Montenegro
- ☐ Netherlands
- ☐ North Macedonia
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Serbia
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden

I. Justice System

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the justice system (if applicable)

5000 character(s) maximum

The process to review the legal aid system has been postponed several times. Work on the review initially commenced in 2020 with a pre-legislative committee, but it did not complete its work. Instead, the task was reassigned in December 2024 to the Judicial Council (retsplejerådet), which is to deliver recommendations in 2026. Thus, no significant development has happened in 2025 .

The current mandate of Retsplejerådet (Judicial Council) remains limited in scope and does not guarantee substantive alignment with European standards on legal aid, nor does it commit the government to follow-up action within a clear timeframe. Stakeholders have already criticized the lingering ineffectiveness of Denmark's legal aid reform efforts. Earlier review process made limited progress, and there has not been meaningful improvement in access to legal aid in practice. More over, the Judicial Council bare no obligation to include any input from the 2020 pre-legislative committee.

To meaningfully implement the Commission's recommendation, the Danish government must:

- Provide clear, binding timelines and deliverables for the Judicial Council review that go beyond analysis to draft legislative proposals.
- Ensure that the review's mandate explicitly requires alignment with European standards on access to legal aid, including adequacy, accessibility and procedural fairness.
- Commit to interim measures to improve access to legal aid while the review is underway, such as simplifying application procedures, expanding coverage thresholds, and strengthening support for marginalised users.
- Attach budgetary commitments to any reform plan to ensure effective implementation rather than symbolic assessment.

Without these steps, the review process risks becoming another cycle of deferred action with little impact on real-world access to justice, confirming that stagnation has replaced reform and that urgent action is needed before the shortcomings of Denmark's legal aid system become permanently entrenched.

<https://www.tlfrh.dk/nyheder/udvalg-om-retshjaelp-nedlagt/>

A. Independence

Appointment and selection of judges, prosecutors and court presidents (incl. judicial review)

(The reference to 'judges' concerns judges at all level and types of courts as well as judges at constitutional courts)

5000 character(s) maximum

Irremovability of judges, including transfers, (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

5000 character(s) maximum

Promotion of judges and prosecutors (incl. judicial review)

5000 character(s) maximum

Allocation of cases in courts

5000 character(s) maximum

Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e. g. Council for the Judiciary)

5000 character(s) maximum

Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

5000 character(s) maximum

Independence/autonomy of the prosecution service

5000 character(s) maximum

Independence of the Bar (chamber/association of lawyers) and of lawyers

5000 character(s) maximum

Additional evidence from the Danish Bar and Law Society indicates further that substantive perceptions of rights protections are weakening in broader areas of the legal environment. More than half of legal professionals surveyed reported a deterioration in rule of law conditions over the past three years, with many pointing to increased surveillance and the expansion of state access to data as factors exerting downward pressure on rights protections and citizens' confidence in legal safeguards. This contextual material underscores that procedural shortcomings are part of a broader pattern in which rights protections and rule of law norms are perceived to be under strain. An additional concern is that the most vulnerable citizens do not enjoy the same protection as the average citizen in Denmark.

<https://www.advokatsamfundet.dk/retssikkerhedsanalysen/>

<https://www.advokatsamfundet.dk/media/ahtbm10g/retssikkerhedsanalysen-2025-alle-data.pdf>

Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

5000 character(s) maximum

B. Quality of justice

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined in the introduction)

[single market relevance] Accessibility of courts (e.g. court/legal fees, legal aid, language)

5000 character(s) maximum

Resources of the judiciary (human/financial/material), remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year)

(Material resources refer e.g. to court buildings and other facilities. Financial resources include salaries of staff in courts and prosecution offices.)

5000 character(s) maximum

[single market relevance] Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

5000 character(s) maximum

Digitalisation (e.g. use of digital technology, including electronic communication and AI tools, within the justice system and with court users, procedural rules, access to judgments online)

5000 character(s) maximum

Denmark is a highly (and increasingly) digitalized society. This includes the court- and legal system, which is also under digitalization. In 2024, forced cases regarding liquidations of companies were included in "Skifteportalen", meaning that these cases will from now on be processed digitally. According to the Danish Courts, this reduces the potential for human error and should help improve the time of proceedings. Of course, digitalization always poses a threat of increasing the barrier for access for individuals not familiar with digital means. However, this change is mostly relevant on the side of the processing of cases, not for citizens, to the best of our knowledge. Other organizations including Justitia may have deeper insights into this potential issue.

Source: <https://www.domstol.dk/aktuelt/2024/6/10000-tvangsoploesninger-digitaliseres/>

Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

5000 character(s) maximum

Geographical distribution and number of courts/jurisdictions ("judicial map") and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.

5000 character(s) maximum

[single market relevance] Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.

5000 character(s) maximum

C. Efficiency of the justice system

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined in the introduction)

[single market relevance] Developments related to efforts to improve the efficiency of the justice system (e.g. as regards length of proceedings, to address backlogs)

5000 character(s) maximum

In 2025, long waiting times in the Danish court system remain a serious and problematic issue, affecting the ability of the justice system to deliver timely rulings and uphold fundamental rights. For example, two serious criminal appeals — one involving large-scale drug trafficking and another concerning a homicide — have been delayed for more than two years before they can be heard in the Court of Appeal, prompting the Supreme Court (Højesteret) to consider whether such delays violate the right to a trial within a “reasonable time” as guaranteed under the European Convention on Human Rights.

The delays reflect broader capacity and procedural challenges within Denmark’s courts, where backlog and scheduling pressures mean that even cases with significant public interest can sit unresolved for years. Legal experts have criticised these delays as undermining legal certainty and fairness for defendants, victims, and society at large.

<https://nyheder.tv2.dk/krimi/2025-03-07-lang-ventetid-i-retten-foerte-til-loesladelse-af-tiltalt-for-voldtaegt>
<https://ni.dk/ni-news/id/b288d69b-0628-470d-aeca-e0d524eedf25/Lange-ventetider-i-retten-skal-vurderes-af-H%C3%B8jesteret>

Any other developments related to the justice system - please specify

5000 character(s) maximum

In 2025, several additional developments point to growing challenges within the Danish justice system, despite Denmark’s continued strong performance on formal rule of law indicators. While judicial independence remains institutionally safeguarded, the practical functioning of the justice system shows signs of regression. Denmark continues to rank highly in international indices, including the World Justice Project Rule of Law Index, yet its overall score declined slightly in 2025, with weaker performance in areas central to justice delivery such as access to justice, civil justice, and fundamental rights. These high rankings risk obscuring persistent structural deficiencies and reducing the perceived urgency for reform.

Longstanding concerns regarding access to justice remain unresolved. Despite repeated attention at EU level, no substantive improvements to the legal aid system were implemented in 2025, and review processes continue without concrete outcomes. At the same time, case processing times continued to increase, extending a multi-year trend. Court data from 2025 indicate longer average handling times than in 2024, particularly in criminal proceedings. Delays have contributed to a rise in the length of pre-trial detention, including cases of exceptionally long detention periods, raising concerns related to proportionality, the presumption of innocence, and the effectiveness of judicial oversight.

In addition to these functional challenges, 2025 saw increasingly explicit political questioning of international conventions and judicial authority. Public statements suggested that judgments from European courts may not always warrant compliance, and initiatives such as the appointment of an Ambassador for Conventions and a review of Denmark’s international obligations have raised concerns that political scrutiny may be used to challenge binding commitments. Taken together, these developments signal risks to legal certainty, effective access to justice, and respect for the rule of law in practice.

<https://www.advokatsamfundet.dk/nyheder/ny-rapport-markant-flere-sidder-aarevis-i-varetaegtsfaengsel/>
<https://domstol.dk/nyheder/2024/danske-dommere-har-stor-tilid-til-vores-retsvaesen/>
<https://www.advokatsamfundet.dk/nyheder/eu-kommissionen-danmark-skal-styrke-retshjaelpen/>
<https://www.altinget.dk/artikel/danmark-taber-sag-i-eu-retten-ghettoloven-er-direkte-forskelsbehandling>
MACS: Monitoring Action for Civic Space – Denmark Country Monitoring, Monitoring Action for Civic Space (MACS), 2025

II. Anti-Corruption Framework

Where previous specific reports, published in the framework of the review under the UN Convention against Corruption, of GRECO, and of the OECD address the issues below, please make a reference to the points you wish to bring to the Commission's attention in these documents, indicating any relevant updates, changes or measures introduced that have occurred since these documents were published.

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the anti-corruption framework (if applicable):

5000 character(s) maximum

In 2025, no concrete steps were taken by the Danish government to implement the recommendation to introduce rules on revolving doors, regulate lobbying, or ensure adequate control of asset declarations for persons entrusted with top executive functions. The European Commission's 2025 Rule of Law Report states explicitly that there are no plans to introduce such rules, a conclusion that mirrors previous years and is confirmed by GRECO's 2025 compliance addendum. This indicates that the main obstacle remains political prioritisation rather than technical feasibility. Public debate and empirical evidence in 2025 underline the continued relevance of these integrity risks. No progress was made in 2025 on introducing rules on revolving doors or lobbying transparency, and Denmark remains without a mandatory cooling-off periods and lobby register, despite repeated civil society calls and recommendations from European and international institutions. Similarly, no steps were taken to strengthen verification and control of asset declarations. While there was no formal regression in 2025, continued non-implementation of this recommendation, combined with growing influence-related risks, points to a widening gap between governance practices and preventive safeguards. Meaningful progress would require binding revolving-door rules, a mandatory lobby register, and effective control of asset declarations.

A. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)

List any **changes** as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/specialised resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO

5000 character(s) maximum

Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption

5000 character(s) maximum

Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators

5000 character(s) maximum

B. Prevention

Measures to enhance integrity in the public sector in particular as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

5000 character(s) maximum

In the 2025 Rule of Law report, the European Commission once again recommended that the Danish government and parliament introduce rules to manage the revolving door issue. No new initiatives have been taken since. In the meantime, the issues remain unresolved, with continued criticism from CSO's working specifically with this matter such as Transparency International Denmark. Multiple articles have uncovered the scope of the issue.

<https://www.taenketankenprospekt.dk/2025/09/27/prospekt-i-dr-p1-svingdoeren-krisetid-ministerrokader-og-klimavalg/>

Further, in 2023 the newspaper Politiken uncovered and mapped the issue specifically in the military- and defense sector, where the weapons industry has been recruiting former high-ranking officials from the Danish Defense: https://politiken.dk/danmark/art9372358/%C2%BBForsvaret-kan-lige-nu-risikere-at-blive-udsat-for-den-perfekte-storm%C2%AB?srltid=AfmBOopcCCQxgsr4IBYL9TLTr20dO7u8_9jW0PVtMWONizB4t5kUczE

Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party, financing)

5000 character(s) maximum

Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned)

5000 character(s) maximum

--> For the three previous points, **please also provide information and figures on their application/enforcement if available to you**, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.)

Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given)

5000 character(s) maximum

[single market relevance] Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups.

- *Such high-risk sectors could include: public procurement, including construction, transport/infrastructure, defence, cohesion, agriculture, environment, healthcare, investor residence schemes, large-scale investments of national interest and the spending of EU funds, urban planning.*
- *In particular, measures to mitigate high risks of corruption in the area of public procurement, such as enhancing transparency and oversight (for example through digital technologies) and promoting fair competition and accountability in public procurement (e.g. targeted actions to address the high share of single bids) and measures to guarantee the effective and independent functioning of the public procurement review bodies.*

5000 character(s) maximum

[single market relevance] Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)

5000 character(s) maximum

C. Repression

The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery

5000 character(s) maximum

Official data on the number of investigations, prosecutions, final judgments and the application of sanctions for corruption offences (differentiated by offence if possible). Please indicate whether the cases: involve legal persons; are related to the implementation of EU or national funds; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data

5000 character(s) maximum

Potential obstacles identified in law or in practice to the investigation and prosecution of high-level and complex corruption cases (e.g. political immunity regulation, procedural rules, statute of limitations, cross-border cooperation, pardoning)

5000 character(s) maximum

Information on effectiveness of criminal and non-criminal measures and of sanctions (e.g. recovery measures and administrative sanctions) on both public and private offenders

5000 character(s) maximum

Any other developments related to the anti-corruption framework - please specify

5000 character(s) maximum

In 2025, no significant structural progress was made to strengthen Denmark's anti-corruption framework, and long-standing preventive gaps remain largely unaddressed. Issues such as political financing transparency, revolving-door practices, lobbying regulation, and conflicts of interest continue to be treated as matters of political culture and ethics rather than as core components of corruption prevention. While a targeted amendment adopted in June 2025 addressed risks related to foreign political financing, persistent domestic transparency concerns—such as anonymous donations, indirect contributions, and limited disclosure requirements—were left unresolved, and broader reform proposals were again rejected.

Similarly, no progress was made on regulating revolving doors or lobbying. Denmark remains without post-employment restrictions, a mandatory lobby register, or binding asset declaration rules, despite repeated recommendations from GRECO, the OECD, and civil society. High-profile cases and empirical research in 2025 continued to highlight close overlaps between political, administrative, and business elites, raising concerns about conflicts of interest and undue influence.

Finally, Denmark still lacks a comprehensive national anti-corruption or integrity strategy. In the absence of an overarching framework, risks related to political financing, lobbying, and revolving doors continue to be addressed in isolation, limiting the effectiveness of preventive action and allowing cumulative integrity risks to persist.

<https://www.altinget.dk/artikel/toplobbyist-til-venstrepolitiker-nej-tak-til-et-dansk-lobbyregister>
<https://globalaktion.dk/rapporter/lobbyisme-har-frit-spil-i-danmark-og-befolkningen-aner-det-ikke/>
<https://www.altinget.dk/artikel/danmark-faar-dumpekarakter-for-manglende-regler-om-svingdoerslobbyister>
<https://www.altinget.dk/artikel/eu-kritik-af-danmark-puster-til-debat-om-lobbyister-vi-har-nogle-problemer-der-fortjener-at-blive-diskuteret>
<https://politiken.dk/magasinet/fortaelling/art5623793/De-diskrete-politiske-pengeklubber>
<https://www.altinget.dk/artikel/pelle-dragsted-nu-skal-vi-goere-op-med-de-hemmelige-penge-i-dansk-politik>
<https://www.information.dk/debat/2022/11/boer-aendre-partistoettersreglerne-tre-bud-paa-hvordan>

III. Media pluralism and media freedom

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding media pluralism and media freedom (if applicable)

5000 character(s) maximum

In the 2025 Rule of Law report, the European Commission recommended the following to the Danish government:

"Continue to advance with the process to reform the Access to Public Administrative Documents Act in order to strengthen the right to access documents, in particular by limiting the grounds for rejection of disclosure requests, taking into account the European standards on access to official documents."

This recommendation has almost been the same since it was first introduced in 2022 and does not adequately address what is lacking and why the issue persists. It is too broad and does not reflect on the slow pace by which the limited progress has taken place.

The Assessment of progress in Denmark, is therefore that there is no progress to be seen. The recommendation from 2025 was to continue the process to reform the Access to Public Administrative Documents Act . The Committee tasked to work with the issue has stated that they are still working on assessing the Access to Public Administrative Documents Act, must no concrete measures or news regarding it have been published by the committee.

There has been published a report from the independent thinktank Justitia, who claim that there is a need to change the Act, as it provides insufficient transparency in practice, due to broad exemptions, long processing times, and a restrictive administrative culture. The report also finds that Denmark falls below Nordic and international standards on access to information.

The report recommends legal reforms with clear deadlines, greater access to documents in political decision-making, and stronger oversight and digital tools to improve transparency.

https://justitia-int.org/wp-content/uploads/2025/01/Pressemeddelelse_Offentlighedslov-og-aktindsigt-%E2%80%93-brug-for-mere-aabenhed.pdf

A. Media authorities and bodies

(Cf. Article 30 of Directive 2018/1808)

Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies

5000 character(s) maximum

Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies

5000 character(s) maximum

Existence and functions of media councils or other self-regulatory bodies

5000 character(s) maximum

B. Safeguards against government or political interference and transparency and concentration of media ownership

[single market relevance] Measures taken to ensure the fair and transparent allocation of state advertising

5000 character(s) maximum

Safeguards against state / political interference, in particular:

- safeguards to ensure editorial independence of media (private and public)
- specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions
- **[single market relevance]** information on specific legal provisions and procedures applying to media service providers, including as regards granting /renewal/termination of licenses, company operation, capital entry requirements, concentration and corporate governance

5000 character(s) maximum

Denmark has two media sources that are considered public service media, Danmark's Radio and TV 2 Danmark. Together these two account around 80% of the national audience function mostly without interference from others . These two can be considered as independent and as fulfilling their role. There is an ongoing critique of especially the broadcaster Danmark's Radio, as being too leftwing in interviews and coverage of politics. This critique comes from the right-wing parties, who believe that their support from the government should be taken away, and therefore should function more as a private broadcaster. The critique seems to not be correct, but there has been summoned to a parliamentary meeting to investigate this, though it seems as a tactic being used by the right-wing, especially at election times

[single market relevance] Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

5000 character(s) maximum

C. Framework for journalists' protection, transparency and access to documents

Rules and practices guaranteeing journalists' independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists

5000 character(s) maximum

In general, journalists in Denmark are safe and are able to work freely without interference. There is a national action plan for journalists, made by the Ministry of Justice . This action plan has a goal to protect media and journalists to have a safe and well working democracy. The action plan has five action points in which it wants to act upon:

- Monitoring of abuses: Establish a dedicated reporting system for journalists and media to report threats, harassment, or attacks.
- Dialogue among stakeholders: Hold semi-annual meetings between media organizations, relevant ministries, and authorities to discuss trends and systemic issues, and coordinate responses.
- International cooperation and experience exchange: Share experiences and practices with similar initiatives in other countries and report progress to UNESCO via national commissions.
- Rotating leadership for daily operations: The Danish Union of Journalists and Danish Media alternate in leading the plan's daily management, ensuring coordination and involvement of all relevant stakeholders.

<https://kfst.dk/pressemeddelelser/kfst/2024/20240408-nye-eu-retningslinjer-skal-modvirke-online-desinformation-ved-valg>

Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists

5000 character(s) maximum

Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information)

5000 character(s) maximum

Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits

5000 character(s) maximum

In Denmark, the implementation of the Anti-SLAPP Directive is still in the early stages. While Danish law already provides mechanisms to protect freedom of expression and prevent abusive lawsuits, there is no dedicated national legislation fully aligned with the EU Anti-SLAPP Directive. As a result, progress is limited, and it is too early to observe direct positive developments attributable specifically to the Directive. However, the Directive has raised awareness among policymakers, courts, and media organizations about the risks of strategic lawsuits against journalists and has stimulated discussions on strengthening safeguards for press freedom and public-interest reporting.

Any other developments related to media pluralism and freedom - please specify

5000 character(s) maximum

PROPOSAL FOR A STATE-FUNDED MEDIA OMBUDSMAN

In 2025, the Danish government proposed the establishment of a state-funded Media Ombudsman tasked with monitoring media coverage and investigating alleged misinformation or harmful reporting. The Ombudsman would have powers to conduct independent investigations across traditional and digital media and refer cases to law enforcement.

The proposal sparked significant public and industry debate. Several media actors warned that such a body could lead to restrictions on freedom of expression and self-censorship, arguing that existing legal frameworks and judicial oversight are sufficient. Others maintained that the proposal would not interfere with editorial freedom. Overall, the media sector largely expressed scepticism, citing risks of political pressure on critical journalism.

By the end of 2025, the proposal was adopted in a modified form, with its primary focus shifted away from established media towards alternative media actors, such as content creators and influencers. The Ombudsman will be empowered to issue decisions and orders where such actors violate guidelines on “good publication practice” defined by the Ministry of Culture.

DIGITALISATION AND AI

In 2025, the rapid growth of generative AI intensified concerns about misinformation and deepfake content. Denmark responded by proposing legislation granting individuals legal rights over their identity, including face, voice, and biometric data. The proposal would make the creation and distribution of deepfakes without consent illegal and allow affected individuals to seek removal and compensation. The initiative received broad political support.

In parallel, the Ministry of Justice proposed expanding criminal liability to include the creation of non-consensual deepfake pornographic material, not only its distribution. Together, these proposals signal a significant shift in Denmark’s approach to AI and media governance and introduce new safeguards addressing risks that did not previously exist at scale. Their implementation may have important implications for freedom of expression, journalism, and platform responsibility.

POLITICAL PRESSURE ON PUBLIC BROADCASTER DR FUNDING AND LICENCE FEES

In 2025, Denmark’s public broadcaster DR became the subject of intensified political debate, particularly from right-wing parties calling for substantial changes to its funding model. Liberal Alliance proposed abolishing state subsidies and restructuring DR as a self-owned institution, arguing that it is overly costly and competes unfairly with private media.

These calls were reinforced following controversy surrounding a DR documentary, which critics used to argue that the broadcaster is politically biased and should face budget cuts. Other parties similarly questioned the legitimacy of licence-fee-based public funding.

Critics of these proposals warned that reduced funding could undermine public service journalism, weaken media pluralism, and threaten editorial independence. The sustained political pressure on DR in 2025 therefore raises concerns about the resilience of public broadcasting and represents an important media governance issue to monitor in future Rule of Law reporting.

<https://radio4.dk/podcasts/radio4-morgen/fik-du-h-rt-liberal-alliance-vil-fjerne-statens-ti>
?

<https://soendagaften.dk/2025/03/facebook-i-marts-kom-til-at-handle-om-drs-dokumentar/>

<https://www.berlingske.dk/politik/dansk-folkeparti-vil-afskaffe-licensen-og-skaere-i-dr>

<https://kum.dk/aktuelt/nyheder/bred-aftale-om-deepfakes-giver-alle-ret-til-egen-krop-og-egen-stemme>

<https://www.justitsministeriet.dk/pressemeddelelse/regeringen-vil-goere-det-ulovligt-at-lave-deepfake-pornografisk-materiale>

<https://www.dr.dk/nyheder/indland/chefredaktoer-en-mediombudsmand-kan-betyde-en-knaegtelse-af-ytringsfriheden>

<https://www.dr.dk/nyheder/indland/mediombudsmand-skal-gaa-efter-influencere-fire-sager-viser-os-maaske-hvorfor>

<https://www.ft.dk/samling/20242/spoergsmaal/s14/index.htm>

IV. Other institutional issues related to checks and balances

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the system of checks and balances (if applicable)

5000 character(s) maximum

There were no recommendations within this area in the Rule of Law reports from 2022-2025. It should be noted that several civil society actors have repeatedly advocated for a recommendation to be made in this area.

A. The process for preparing, enacting and implementing laws

[single market relevance] Framework, policy and use of impact assessments and evidence based policy-making, stakeholders'*/public consultations (including rules and practices on the transparent participation of civil society to policy development and decision-making processes), and transparency and quality of the legislative process in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation)

* This includes also the consultation of social partners

5000 character(s) maximum

As the political and parliamentary situation in Denmark remained largely unchanged in 2025, with a slim majority government continuing in office, the overall structures for policymaking—including evidence-based policymaking, stakeholder and public consultations, transparency, and the quality of the legislative process—also remained broadly similar to previous years. Consequently, longstanding concerns regarding short public consultation deadlines persist. While the issue continues to be acknowledged in political and public debate, there is no indication that substantial changes in practice were implemented in 2025.

In January 2024, the think tank CEPOS concluded that short consultation periods had remained a recurring problem throughout the government's first year in office, and there is no evidence that this pattern was reversed in 2025 (see: <https://cepos.dk/artikler/svm-regeringens-forste-ar-stadig-problemer-med-kortehoringsfrister/>). Similarly, in 2024, the independent legal think tank Justitia published a comprehensive report identifying structural challenges in the legislative process. These findings remain relevant in 2025, and we continue to stand by the conclusions and concerns raised in the report (full report available here: https://justitia-int.org/wp-content/uploads/2024/07/Rapport_Udfordringer-i-lovgivningsprocessen_15072024.pdf).

The report documents the persistent use of consultation periods shorter than the recommended minimum of four weeks (pp. 117–132) and highlights broader concerns about legislative quality linked to limited parliamentary resources (pp. 147–153). According to the report, Members of Parliament often lack sufficient time and capacity to independently assess government proposals, increasing reliance on information and analyses produced by ministries. This challenge is particularly pronounced for MPs from smaller parties, who must cover a wider range of policy areas with fewer resources. Taken together, these structural constraints continue to pose risks to the quality of legislation and the effectiveness of parliamentary scrutiny in 2025.

[single market relevance] Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency /urgent procedure compared to the total number of adopted decisions)

5000 character(s) maximum

In 2025, the use of accelerated legislative procedures continued to raise concerns regarding the quality and inclusiveness of the Danish lawmaking process. Several legislative initiatives were adopted under tight timeframes, limiting opportunities for meaningful public consultation and parliamentary scrutiny. A prominent example was the fast-tracked legislation related to the establishment and expansion of a weapons manufacturing facility in Jutland.

In this case, the government justified the use of urgent procedures by reference to security and defence considerations, including Denmark's obligations in light of the international security situation. However, the accelerated process resulted in significantly shortened consultation periods and limited time for stakeholders, civil society, and affected local communities to assess and respond to the proposal. Parliamentary debate was similarly constrained, increasing reliance on government-provided assessments.

While the use of emergency or expedited legislation is permitted under Danish constitutional practice, its continued and broad application in 2025 reinforces existing concerns about the normalisation of fast-track lawmaking. This risks weakening transparency, reducing legislative quality, and undermining effective democratic oversight, particularly when urgency is invoked in areas with significant societal, environmental, or human-rights implications.

<https://www.fmn.dk/en/news/2025/agreement-putting-denmark-at-more-than-3-pct.-of-gdp-allocated-for-defence-in-2025-and-2026?utm>

<https://www.bruunhjejle.dk/new-danish-legislation-provides-fast-track-framework-defence-and-emergency-preparedness-projects?utm>

[single market relevance] Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

5000 character(s) maximum

Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight

5000 character(s) maximum

Regime for constitutional review of laws

5000 character(s) maximum

Regarding the legality of laws and administrative practice, public debate in Denmark has increasingly highlighted structural weaknesses in how legal compliance is ensured in practice. In 2025, legal scholars raised concerns that Danish citizens have limited effective remedies when public authorities fail to comply with existing law. According to a legal analysis published by Altinget, the Danish system places a heavy burden on individuals to challenge unlawful administrative decisions, while access to courts is constrained by costs, procedural complexity, and lengthy proceedings.

A central concern raised by a Danish law professor is that, in practice, authorities may continue to apply unlawful or legally questionable practices for extended periods, even when their legality is disputed. Citizens affected by such practices often lack realistic options to obtain timely redress, as judicial review is slow and administrative complaint mechanisms do not suspend the application of contested decisions. As a result, unlawful practices may persist until courts eventually rule on them—if cases are brought at all.

This situation raises broader concerns about the effectiveness of judicial protection and the principle of legality. While Denmark formally adheres to the rule of law, the limited accessibility of remedies means that unlawful administrative conduct may go uncorrected in practice, particularly where affected individuals lack resources or legal expertise. The debate underscores the need to strengthen access to justice and ensure that legal safeguards function effectively not only in theory, but also in practice.

<https://www.altinget.dk/civilsamfund/artikel/juraprofessor-borgerne-kan-faktisk-ikke-goere-meget-naar-myndighederne-ikke-overholder-loven>

B. Independent authorities

Independence, resources, capacity and powers (including effective access to relevant data) of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

(Cf. the website of the European Court of Auditors: <https://www.eca.europa.eu/en/Pages/SupremeAuditInstitutions.aspx#>)

5000 character(s) maximum

Statistics/reports concerning the follow-up to recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies and supreme audit institutions in the past year

5000 character(s) maximum

[single market relevance] Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators such as national economic oversight, enforcement and competition authorities

C. Accessibility and judicial review of administrative decisions

[single market relevance] Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)

5000 character(s) maximum

[single market relevance] Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review)

5000 character(s) maximum

[single market relevance] Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

5000 character(s) maximum

[single market relevance] Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

5000 character(s) maximum

Political discourse in 2025 featured increasingly loud voices questioning the relevance and authority of international law and courts. Following debates in previous years, the government appointed an Ambassador for Conventions and launched an investigation into Denmark's obligations and room for manoeuvre under the European Convention on Human Rights. While these initiatives were formally framed as clarificatory and exploratory, critics raised concerns that they could be used as levers to reinterpret, limit, or weaken Denmark's binding international commitments rather than to strengthen compliance.

In parallel, some politicians publicly advocated ignoring or not implementing judgments from European courts, arguing that Denmark should only comply selectively with international judicial rulings. This was illustrated most clearly following a December 2025 judgment of the Court of Justice of the European Union, which found that Denmark's so-called "Ghetto law" may be incompatible with EU race equality directives and that national courts must assess whether ethnic origin leads to disadvantage. In response, the Danish People's Party publicly stated that Denmark should "ignore" the ruling. Such statements go beyond legal critique and directly challenge the binding authority of EU law and judicial decisions. Together, these developments mark a qualitative change in the political environment surrounding the justice system. While Denmark has not formally withdrawn from any international obligations or refused to implement a judgment, the normalisation of political narratives questioning compliance with international law constitutes an emerging structural risk to the rule of law.

<https://www.altinget.dk/artikel/her-er-danmarks-nye-konventionsambassadoer>

<https://politiken.dk/danmark/art10301405/Ny-ambassad%C3%B8r-skal-g%C3%B8re-det-nemmere-at-smide-kriminelle-udl%C3%A6ndinge-ud>

<https://www.zetland.dk/historie/s8PIrhRq-ac0gnmiD-0c003>

<https://www.altinget.dk/artikel/stoklund-foreslaar-en-erodering-af-den-internationale-retsorden-og-sender-danmark-paa-slingrekurs>

<https://www.altinget.dk/artikel/danmark-taber-sag-i-eu-retten-Ghetto-loven-er-direkte-forskelsbehandling>

[single market relevance] Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation

5000 character(s) maximum

Oversight, including by courts, of the use of intrusive surveillance software by national authorities

5000 character(s) maximum

D. The enabling framework for civil society

Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

5000 character(s) maximum

On the legal framework, we repeat the overall framework from our input last year:

On the legal framework, the overall structure governing Danish civil society and human rights defenders remains formally unchanged in 2025. Freedom of association continues to be protected under Article 78 of the Danish Constitution, with the sole legal limitation being that associations must pursue lawful activities. Civil society organisations are subject to basic formal requirements—such as having more than two members, adopting statutes, and holding a documented founding meeting—particularly where they seek to employ staff or receive public funding. In principle, the legal framework does not impose substantive restrictions on civil society or human rights defenders. However, administrative burdens and procedural barriers persist and continue to affect organisations in practice.

While concerns regarding civic space were already raised in 2024, developments in 2025 indicate a further deterioration. Issues that were previously described as isolated or anecdotal—such as the risk of de-funding, political pressure, and self-censorship among civil society organisations—have become more visible and systemic. In particular, organisations working on politically sensitive issues report increased uncertainty and constraints affecting their ability to operate freely.

Against the backdrop of the ongoing conflict between Israel and Hamas, several municipalities, most notably in Copenhagen, have in 2025 continued or expanded restrictions on the use of public cultural venues for events addressing foreign policy issues. Representatives of nationwide civil society and educational organisations have warned that such measures have already had concrete consequences for associations, limiting democratic debate and contributing to self-censorship. Concerns have been raised that these restrictions may have a chilling effect beyond the immediate context, potentially affecting a broader range of political discussions and civic activities.

Legal experts have reiterated that such practices raise constitutional concerns. According to Danish constitutional law scholars, municipalities are required to act neutrally and are not permitted to deny access to public facilities based on the political content of lawful activities. The continuation of these restrictions in 2025 therefore highlights a growing gap between Denmark's formal legal protections for civil society and the practical conditions under which civic actors operate.

<https://politiken.dk/kultur/art10205041/Juraprofessor-K%C3%B8benhavn-Kommune-agerer-%C2%BBbizart%C2%AB>

<https://politiken.dk/kultur/art10183984/K%C3%B8benhavn-Kommune-f%C3%A5r-h%C3%A5rd-kritik-for-%C2%BBmystisk%C2%AB-brev-til-kulturhuse>

Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures to protect them from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services, as well as available remedies

5000 character(s) maximum

Developments in 2025 indicate that a growing number of CSOs experience indirect pressures that negatively affect their ability to operate effectively and safely.

A key finding from consultations with CSOs is an increasing prevalence of self-censorship driven by fear of political, reputational, or financial repercussions. Several organisations report exposure to hostile political rhetoric and negative narratives that portray certain CSOs as partisan, disloyal, or illegitimate actors. This rhetoric has particularly targeted organisations working on minority rights, climate advocacy, migration, and international solidarity. While such attacks are often verbal and take place in public or online debate, they contribute to an intimidating environment and undermine public trust in civil society.

These narratives are frequently accompanied by explicit or implicit threats to reduce or withdraw public funding from organisations expressing critical views. For smaller organisations with limited financial resilience, such pressures have a direct impact on operational security and strategic decision-making. Some CSO employees report being instructed internally to avoid certain public statements in order to mitigate risks of political backlash or defunding. This dynamic amounts to a chilling effect on legitimate advocacy and participation in democratic debate.

In early 2025, the fast-tracked legislative package implementing the 2024 political agreement to strengthen efforts against antisemitism further illustrated these concerns. While widely supported in principle, elements of the package raised alarm among CSOs and media actors. In particular, the broad definition of “the new antisemitism,” which includes “contempt for the State of Israel,” was criticised for potentially exposing CSOs to accusations, reputational harm, or legal risks when engaging in legitimate political critique. In addition, the proposed expansion of police powers to order the removal of online content deemed “terror-related” without prior judicial review raised concerns about over-enforcement and precautionary self-censorship among civil society and media actors.

In the media sphere, warnings issued in 2025 by the European Centre for Press and Media Freedom regarding the proposed establishment of a Danish Media Ombudsperson further highlighted risks related to institutional pressure. According to ECPMF, the concentration of enforcement powers in a state-appointed body could weaken safeguards for editorial independence and contribute to legal uncertainty, indirectly affecting civil society actors’ ability to engage in public debate without fear of legal repercussions.

At the same time, Denmark lacks dedicated mechanisms to systematically monitor threats, intimidation, or smear campaigns against CSOs and human rights defenders. While general legal remedies exist—such as defamation law and access to courts—there are no specialised protection frameworks, early warning systems, or support services tailored to civil society actors facing political pressure or reputational attacks. As a result, many organisations rely on informal networks and self-protective strategies rather than institutional safeguards.

<https://edri.org/our-work/denmark-will-issue-removal-orders-without-court-approval-impacts-on-free-speech-and-pro-palestinian-voices/?utm>

<https://www.rcmediafreedom.eu/News/Denmark-MFRR-partners-oppose-introduction-of-new-state-funded-media-Ombudsperson?utm>

https://mpm.cmpf.eu.eu/public/upload/%2077%20_%20Folketinget.pdf

Views voiced by several CSOs as a Roundtable Meeting with EU Commissioner Michal McGrath, 4 December 2025. The Meeting was organised by Nyt Europa.

3d7754_87c9c78c80314c29b7ec7818601.pdf

Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

5000 character(s) maximum

Regarding this question, we will be repeating the same as last year, as the issues remain the same in Denmark: There have been multiple cases in 2024 and 2025 highlighting concerns regarding civic space and human rights defenders. In the last report, we noted concerns about the de-funding of civil society organisations as well as self-censorship as a result of this. While these concerns were at that point largely anecdotal, the issue has developed significantly over the past year.

The clearest example is the case concerning ActionAid Denmark and political attempts to defund the organisation due to its political advocacy. ActionAid Denmark is a partially publicly funded organisation, receiving an annual public contribution of approximately DKK 129 million.

In September, several media outlets published editorials criticising the public funding of the organisation, arguing that “taxpayers’ money is being spent on left-wing propaganda” (source 1). This criticism was particularly linked to ActionAid Denmark’s advocacy related to the war in Gaza, but also referenced its work on issues such as access to Danish citizenship. This critique has also been stated in 2025.

In 2025, Helle Bonnesen - an MP from the Conservative People’s Party - who stated that Danish CSOs who sue the state should not be able to get financial support from the state. This statement followed a lawsuit filed by three Danish and one Palestinian CSO against the Danish government over its weapons exports to Israel. The statement drew criticism from both the public and especially from other CSOs. Though Helle Bonnesen later withdrew parts of her statement, her reasoning can still be found in the political programme that four right-wing parties (Liberal Alliance, Denmark Democrats, Conservative People’s Party and Danish People’s Party) have launched prior to the upcoming national election in 2026. Liberal Alliance’s political spokesperson, Sólbjørg Jakobsen, has stated that, among other things, CSOs that engage in (unfavourable) political activities should not receive public funding.

Concerns regarding funding pressures were further reinforced when, in the government’s proposal for the 2025 Finance Bill, the organisation LGBT+ Danmark saw its operational grant reduced by 62%. This occurred shortly after the organisation publicly criticised statements made by the Minister for Gender Equality, Marie Bjerre, who had spoken out against what she termed “woke-ism”, particularly in relation to transgender rights (sources 6 and 7). While no direct causal link can be conclusively established, the timing of these developments has been perceived as such by civil society actors and has contributed to concerns about the consequences of speaking out critically

The Danish umbrella organisation for civil society has also raised broader concerns regarding the current model for allocating public funding to civil society organisations and has called for reform. The government has announced its intention to propose a new funding model, but no concrete details have yet been presented

Beyond these recent cases, we reiterate the structural concerns already highlighted in last year’s report. Public funding for civil society is widely perceived as limited and unreliable, creating strong disincentives to rely on it as a stable source of income. This contributes to a broader lack of access to core funding, forcing organisations to depend on short-term, project-based grants. As a result, organisations face difficulties in long-term planning and strategic development, staff experience increased job insecurity, and the sector struggles to retain qualified

personnel. Ultimately, these conditions weaken civil society's capacity to engage sustainably in democratic processes and public debate.

<https://www.berlingske.dk/ledere/berlingske-mener-sagen-om-mellemfolkeligt-samvirke-peget-paa-et-generelt>
<https://radio4.dk/nyheder/df-i-flaesket-paa-ngoer-oxfam-danmark-burde-ogsaa-miste-stoette>
<https://handicap.dk/nyheder/statsstoette-maa-ikke-blive-mundkurv>
<https://radio4.dk/nyheder/lars-loekke-afviser-blankt-at-traekke-ngo-i-stoette-q2RJIOSCuqLcabTfNoJN>
<https://dm.dk/akademikerbladet/aktuelt/hvordan-hjaelper-vi-dem-der-hjaelper-andre/forening-kaemper-med-oekonomien-efter-voldsom-koensdebat/>

<https://www.altinget.dk/civilsamfund/artikel/k-vil-tage-offentlig-stoette-fra-ngoer-der-sagsoeger-staten>
<https://www.altinget.dk/civilsamfund/artikel/k-vil-tage-offentlig-stoette-fra-ngoer-der-sagsoeger-staten>
https://www.linkedin.com/posts/nyteuropaorg_fuldst%C3%A6ndigt-bekymrendeog-vigtigt-at-b%C3%A5de-activity-7379787258771623936-aFQq?utm_source=share&utm_medium=member_desktop&rcm=ACoAAEz3PWQBjLGy1txzlfYeYdZAKgv9QhDyP7M
<https://www.altinget.dk/uddannelse/artikel/laekket-dokument-her-er-den-blaa-opposition-50-forslag-til-en-borgerlig-regering>

E. Initiatives to foster a rule of law culture

If there have been developments related to initiatives to foster a rule of law culture, please specify, which (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, education initiatives, etc.)

5000 character(s) maximum

Currently, there are no known government- or parliament-led initiatives aimed specifically at fostering a broader rule of law culture in Denmark. The concept of the rule of law remains relatively underdeveloped in political discourse and is not widely used as an explicit analytical or policy framework.

Any other developments related to the system of checks and balances - please specify

5000 character(s) maximum

During 2025, civic space in Denmark continued to narrow in practice, despite the absence of significant restrictive legal reforms. Civil society organisations increasingly reported that rhetoric and practice-based dynamics affected their ability to participate meaningfully in democratic processes and to act as independent checks on power. A recurring concern related to participation in decision-making, particularly public consultations. Throughout the year, CSOs continued to report short consultation deadlines, frequently scheduled during holiday periods, which limited the ability to prepare substantive responses, especially for smaller and volunteer-based organisations. This follows previous years' trajectories as reported by others. Justicia has for instance documented that public consultations with a deadline of less than 10 days have increased since 2021. Many organisations moreover experienced that their consultation contributions were neither acknowledged nor reflected in final policy outcomes, reinforcing perceptions that consultations are procedural rather than deliberative. More seriously, some CSOs reported that their wording and arguments from consultation submissions were later used to justify political positions that directly contradicted their

advocacy, creating a sense that participation could be used against them and discouraging future engagement.

Funding conditions remained another key pressure point. Public funding distributed through the annual Finance Act continued to be perceived as opaque and politicised. Moreover, a significant share of CSOs has experienced funding tied to politically conditions. and find this tendency is increasing . In 2024, several high-profile cases involved calls to defund civil society organisations working on minority protection and fundamental rights, including ActionAid Denmark, LGBT+ Denmark, Oxfam Denmark, and Sabaah, and similar dynamics continued in 2025. For example, Conservative MP Helle Bonnesen publicly argued that CSOs bringing legal cases against the state should not receive public funding, following a lawsuit by three Danish and one Palestinian CSO against Denmark over arms exports to Israel; while parts of the statement were later withdrawn, similar arguments remain reflected in a joint political programme launched by four right-wing parties ahead of the upcoming election, and echoed by Liberal Alliance spokesperson Sólbjörg Jakobsen . More broadly, CSOs in 2025 reported continued difficulties in securing funding for political or advocacy work that diverges from government priorities, a challenge highlighted in the context of the war in Gaza but also affecting organisations working on environmental and other politically sensitive issues, with 25% of CSOs in a recent survey reporting experiences of conditional or agenda-linked funding.

The broader civic environment became more challenging in 2025 due to a combination of administrative, policing, and discursive practices. Administrative practices have contributed to uneven access to civic space, including cases where municipalities denied certain groups access to public venues, as well as administrative hurdles affecting the operation of civil society organisations, such as difficulties in opening bank accounts and other technical requirements relevant to their day-to-day activities. As a countervailing development, the Danish government presented a policy proposal in early 2025 with 30 initiatives aimed at reducing administrative burdens for volunteer associations, which has been welcomed by key stakeholders and is expected to ease bureaucratic pressures on civil society. At the same time, several politically sensitive demonstrations were met with forceful policing and large-scale detentions, raising concerns about potential chilling effects on the exercise of the right to peaceful assembly. Organisations and activists working on climate issues, minority rights, LGBTQ+ rights, and international solidarity also faced increased online harassment, smear campaigns, and delegitimising rhetoric. For example, during the annual Democracy Festival (Folkemødet) in June 2025, Prime Minister Mette Frederiksen and former Conservative Party leader Søren Pape characterised climate activists as “anti-democratic,” contributing to concerns about polarisation and the stigmatisation of parts of civil society.

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Cross-pillar elements: cross-border rule of law issues related to the Single Market

If there are any significant challenges concerning the Single Market you have been facing in a cross-border context relating to any of the four pillars of the report,

including for example issues with market access and the conditions for economic activities, that you would like to highlight, please do so here.

Given the cross-cutting nature of this question, it is included as a separate section in the questionnaire. Information collected under this question will however be integrated under the relevant existing pillar(s) of the Report.

5000 character(s) maximum

Supporting document upload

If you would like to submit any supporting document(s) to your contribution, please upload your file(s) here

Contact

rule-of-law-network@ec.europa.eu