

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

If "Other", please specify

Professional federation

* Organisation name

250 character(s) maximum

European Federation of Journalists

Main Areas of Work

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

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

500 character(s) maximum

europeanjournalists.org

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

27471236588-39

* 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

Camille

Surname

Petit

Email Address of the organisation

secretariat@europeanjournalists.org

* 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

Media Freedom Rapid Response - MFRR's flagship Mapping Media Freedom (MapMF), recorded 1481 press freedom violations affecting 2377 journalists and other media professionals during 2025 across the European Union member states and candidate countries. The rise in the number of alerts in 2024 and small discrepancies with the numbers in 2025 show that this has become a consistent trend. The main difference compared to 2024 lies in the severity of attacks, with 2025 marking four deaths of journalists, compared to one in 2024. Although three of these cases occurred in Ukraine and one in Turkey, they highlight that impunity remains high, as crimes against journalists and murders often remain unsolved for years.

According to MapMF data, government and public officials were responsible for approximately one in five (21%) of all recorded incidents in EU member states during 2025. This marks a sharp increase from 2021, when such officials were implicated in just 10% of incidents. The online environment remains the most common setting for attacks, with incidents steadily rising in recent years. In 2025, 23.5% of all recorded incidents in the EU occurred online, with spoofing, identity disguise, and deepfakes emerging as growing concerns. Intimidation and threats were the most frequent types of attacks, accounting for 19% of cases documented by the MFRR. Another alarming trend, which surged in 2024 and persisted through 2025, is the proliferation of foreign-agent laws inspired by Russian models. These laws have raised significant concern among media organisations, with repeated threats of adoption and troubling reports emerging across both EU member states and candidate countries. MapMF recorded 72 threats of foreign agent laws in 2025, with a rise of alerts in EU member states - 34 in 2024, escalating from 20 incidents in 2024. This legislation risks silencing and exiling independent media entirely. While Hungary and Slovakia have intensified their push for these laws, similar threats from political figures have been observed in other EU countries. The spread of foreign-agent laws reflects growing illiberal influences in Europe, and the EU must firmly oppose any such proposals.

These types of threats tap into already existing legal threats, such as Strategic Lawsuit Against Public Participation (SLAPP) and criminalisation of defamation, one of the largest and most powerful tools used to intimidate journalists and media outlets. The MFRR submission and the upcoming monitoring report aim to emphasise the importance of timely and robust transposition of the Anti-SLAPP Directive by highlighting concerning cases.

Elections and protests were among the most dangerous environments for journalists in 2025. MFRR has registered 110 election-related alerts throughout the year. In terms of protests, Serbia serves as a stark example, recording the highest number of alerts last year (208), which affected 358 journalists and media workers. In April, the MFRR organised an urgent mission to Serbia to draw attention to the challenges journalists face during protests. The incidents reported there are wide-ranging, including spyware abuse, raids on newsrooms, intimidation, violence, and media capture. While most of these incidents are not directly linked to protest coverage, Serbia's case illustrates how governments are intensifying their crackdown on independent journalism amid nationwide unrest.

Last, but not least, discriminated groups remain most vulnerable to different types of attacks. Recognising that many of them go unregistered due to a distrust in official institutions, it is important to emphasise that they contribute to a general sense of insecurity among independent journalists. Thus, gendered-based attacks remain a concern, with 56 gender-based attacks recorded in 2025, compared to 38 in 2024, and 16 attacks related to the sexual orientation of journalists or media workers. Journalists in exile are particularly vulnerable, and MFRR has started recording cases specifically related to them. With many cases still to map out, MapMF has registered four such cases in 2025.

This text is part of Media Freedom Rapid Response (MFRR) joint input to the Rule of Law Report, and is submitted by the following consortium members: European Centre for Press and Media Freedom, Article 19, European Federation of Journalists, Free Press Unlimited, International Press Institute, Osservatorio Balcani Caucaso Transeuropa.

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

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

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

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

Any other developments related to the justice system - please specify

5000 character(s) maximum

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

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

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

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

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

Over the past year, the measures in Croatia that can be linked to ensuring the independence, enforcement powers, and adequacy of resources of media regulatory bodies have primarily related to activities aimed at aligning national legislation with the European Media Freedom Act (EMFA). In its 2025 Rule of Law Report, the European Commission notes that the Agency for Electronic Media is independently financed and continues to play an important role in media oversight and the promotion of pluralism, alongside the Ministry of Culture and Media's plans to revise the Media Act and implement certain EMFA provisions. In the same context, plans were also mentioned to expand the Agency's mandate to cover all types of media, including print media, which would imply a broader regulatory framework and potentially stronger institutional oversight powers.

Over the past year, the revised Media Act and Electronic Media Act have not been adopted. A draft law on the implementation of the EMFA was presented and opened for public consultation in July and August 2025. It is currently under parliamentary debate, having passed its first reading, but has faced clear criticism that the changes are more formal than substantive in terms of the regulator's independence and enforcement powers.

Under the draft law, the regulator would be renamed from the Agency for Electronic Media to the Media Agency; however, the proposed model for appointing the bodies that govern the media regulator does not ensure compliance with the EMFA's requirements for the regulator's full independence from the executive branch, and it preserves significant government influence. Without clear mechanisms ensuring openness and inclusiveness of the process, it does not strengthen the regulator's genuine institutional autonomy.

The draft EMFA implementation law expands the financing model of the new Media Council and, in addition to electronic media, now links it to print media and platforms for sharing audiovisual content (Article 17). However, it remains unclear how, in practice, the prescribed communication with platforms will be established and implemented, for example for the purpose of collecting the envisaged obligations. The biggest unresolved issue remains that the EMFA implementation law did not open a serious discussion on possible solutions for more transparent and more independent appointment and dismissal of governing bodies, even though it is clear that the EMFA sets only minimum standards and that anything beyond that depends exclusively on political will. In our view, however, even the minimum standards have not been met.

Given the new tasks introduced by the EMFA (oversight of transparency, public funding, market concentrations,

etc.), it was necessary to ensure stable staffing resources and clear powers to initiate administrative and misdemeanour proceedings, together with an obligation of transparency in the work of the Agency and the publication of its decisions. These issues should have been defined through a comprehensive reform of the core media laws (the Media Act and the Electronic Media Act), because partial alignment through an implementing law does not resolve the structural problems of political influence over appointments and governance, nor does it provide clear guarantees of the regulators' independence. Without clear rules and mechanisms for the transparent allocation of public funds and state advertising, space remains for political pressure on the regulatory body, which indirectly weakens both the regulatory framework and its effectiveness.

It is necessary to strengthen the legal safeguards for the regulator's institutional autonomy, including transparent and depoliticised procedures for appointment and dismissal, term limits, and clear mechanisms to protect against conflicts of interest. The expansion of the regulator's competences must be accompanied by the provision of stable financial and human resources so that regulatory bodies can effectively carry out oversight, adopt decisions, and ensure enforcement in practice, in line with the new obligations arising from the EMFA.

Key issues remain open regarding genuine independence from the executive branch, transparency of appointments and dismissals, term limits, and although the law provides additional funds for expanding powers—it remains unclear how this will be implemented in practice.

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

In last year's European Commission Report, it was emphasised that the Council for Electronic Media, as the governing body of the Agency for Electronic Media, has come under increased scrutiny due to the fact that, in practice, the mandates of its members can be extended without limit. The Report notes that discussions are taking place on introducing term limits in order to prevent the same individuals from remaining at the head of the body for too long and to ensure that new perspectives are brought into the regulator's work. However, over the past year no amendments have been adopted that would, in practice, change the existing model for the appointment and dismissal of members of the regulator's governing body, nor have mechanisms been established to address the identified risks.

In our comments on the proposed EMFA implementing framework, we warned that the proposed approach does not introduce clear and binding standards that would ensure a depoliticised, transparent, and merit-based procedure for selecting members of the Council, including plural participation and an open public call. The proposed model keeps key кадровские decisions under the dominant influence of the executive branch, without sufficiently strong safeguards against political patronage and conflicts of interest, and without genuine mandate protection for members. The process defined in the draft law lacks transparency and inclusiveness.

In this context, although an adjustment of the regulatory framework to the new European rules is formally announced, in practice no change has been made that would ensure that appointments and dismissals are fully protected from political influence, nor have additional procedures been introduced to guarantee openness, professionalism, and independence in the work of the regulator's governing body. We again warn that without such changes there is a risk that the regulatory structure will only be formally aligned with the EMFA, while the key problems of institutional independence remain unresolved, which in the long term weakens the regulator's enforcement capacity and credibility in protecting media freedom and pluralism. It should also be recalled that the MFRR Report warned about the lack of political independence of the regulatory body for electronic media, namely the Council for Electronic Media (CEM), whose members are appointed on the Government's proposal by a simple majority in Parliament for an unlimited number of terms.

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

5000 character(s) maximum

Although last year's Rule of Law Report emphasised that Croatia does not have a single national self-regulatory body (such as a media council or press council) that would serve as a central self-regulation mechanism for the entire media sector, no changes occurred in this regard over the past year. No new self-regulatory body has been established with a mandate to handle public complaints, monitor professional standards, and issue recommendations or decisions that would be broadly accepted and applicable across all types of media. In practice, media self-regulation in Croatia continues to rely primarily on the professional association Croatian Journalists' Association and its internal mechanisms. This body has no formal powers and cannot impose financial or other sanctions; rather, it functions as a professional self-regulatory body that assesses the ethical dimensions of journalism and evaluates and publishes violations of the ethical code.

At the same time, oversight and regulation of electronic media continue to be carried out through regulatory bodies established by law, primarily through the Agency for Electronic Media and its governing body. This model represents institutional regulation, but it is not a professional self-regulatory mechanism. It can therefore be concluded that Croatia still lacks a unified, comprehensive framework for self-regulation that would operate as an independent media council, with clear powers and a recognised role in strengthening professional standards, media accountability, and public trust.

Over the past year, there have been no visible institutional steps towards establishing such a body, nor have new procedures or structures been introduced that would strengthen self-regulation across the media sector as a whole. Croatia therefore remains without a single national self-regulatory body that would function as a standard forum for addressing ethical issues and complaints in the media.

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

Some changes have been made, as the previous law did not provide for sanctions. The draft law on the implementation of the EMFA now introduces sanctions. The Agency for Electronic Media (AEM) has developed a register that should also monitor the allocation of state advertising funds. This represents legislative and institutional progress, but it is still too early to assess whether it will change the previously poor practice, which involved clear preferential treatment.

It should be emphasised that, beyond state advertising, the situation is even more serious when it comes to advertising by state-owned enterprises, as it is estimated that these companies spend significantly more on advertising than other institutions, while these funds are generally not monitored or accounted for in a transparent manner, given that they are not subject to the same reporting obligations.

According to the recommendations of the international Media Freedom Rapid Response mission, it is necessary to ensure that rules on fair distribution and transparency of state advertising apply to all public authorities, to strengthen reporting obligations so that all public bodies and state-owned companies comply with their legal obligations regarding the publication of spending data, and to expand the monitoring of public funds to include all contracts linked to media outlets and companies within the same business groups. Over the past year, the EMFA implementation law has nevertheless introduced certain changes, as reporting is no longer done post hoc on non-transparent allocations of state advertising, as was previously the case; instead, among other things, law provides that state advertising will be allocated through public calls, which was not the case before, since these funds were used to negotiate direct influence over the media.

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

Over the past year, no implementation changes have been introduced that would, in practice, ensure stronger editorial independence of the media. Although the EMFA framework was expected to introduce clearer standards and mechanisms to protect editorial autonomy, this has not happened. Key problems remain unresolved: in practice, pressures on editorial policies are still being recorded, while mechanisms that should protect newsroom autonomy (e.g. editorial statutes) do not function consistently or are not respected. It is particularly problematic that there are no effective safeguards, nor clear sanctions for management or owners who fail to comply with these statutes and thereby undermine editorial independence. Due to the absence of enforceable legal consequences, statutes in parts of the media sector remain formal documents without real effect, and editorial independence continues to depend on the goodwill of management structures rather than on systematically protected rules and oversight.

Over the past year, no reform has been implemented that would depoliticise the appointment of governing bodies of public media. The appointment model still allows for strong political influence, as key decisions are made by a simple majority in Parliament, without mechanisms to ensure broader consensus and protection from political control. In addition, the financial independence of public service media has not been strengthened in a way that would reduce their vulnerability to political decisions. For example, the structural problem of stagnating revenues from the licence fee and state budget co-financing remains a significant risk, as it potentially increases the influence of the executive branch over programme-related and operational autonomy. The current subscription fee is unlawful, as it has not been adjusted for years in line with wage growth, even though it should have been. There is concern that if the licence fee is increased, people may stop paying because cratia radio television's reputation is poor due to politicisation. Over the past year, no new measures have been introduced to ensure a stable, predictable, and politically independent funding model, nor have internal mechanisms for pluralism and the protection of the public interest been strengthened.

The adoption of a new PMS Act and a reform of public service media governance are repeatedly announced; however, over the past year no such law has been adopted, nor is there publicly available clear information demonstrating that work on it is being carried out systematically through a transparent process, with defined deadlines, a working draft of the text, and the involvement of relevant stakeholders. As a result, it remains uncertain whether and when real changes will take place that would ensure depoliticised governance, stable financing, and stronger guarantees of PMS's editorial independence.

Although the implementation of the European Media Freedom Act envisages expanding the regulator's competences to cover all media, including print, over the past year no clear and enforceable changes have been introduced that would significantly improve oversight of ownership concentration, capital entry, and

corporate governance in the media sector. In practice, issues related to concealed ownership and affiliated companies within business groups remain unresolved, as do the limited mechanisms available to the regulator to effectively verify and sanction irregularities. With regard to media ownership concentration and market influence, general legal frameworks exist, but without sufficiently strong instruments to identify and prevent excessive concentration or non-transparent ownership structures in a timely manner. The regulatory framework that has been formally established is more transparent than the previous one, and individual financial data for all media outlets are finally available, making it possible to monitor market developments. Given the expanded powers and the print media register that will be incorporated into this system, I believe that some progress has nevertheless been made in this area.

[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

Over the past year, Croatia has made limited progress in the area of transparency of media ownership, primarily through the development and availability of public databases on media ownership and financing. Mechanisms exist for the public disclosure of information on media ownership structures, which represents a step towards greater transparency and enables citizens and professionals to gain insight into the formal owners of media publishers. However, in practice, significant problems remain with regard to full transparency, especially when it comes to indirect and real (ultimate) ownership. Risks of concealed ownership and insufficient verifiability of data have been identified, including situations in which the actual owners or related persons are not clearly visible through publicly available registers. There are also limitations in the enforcement mechanisms of the competent authorities, which makes effective oversight and sanctioning of inaccurate or incomplete ownership information more difficult. It can therefore be concluded that, although certain information on media ownership is available and public tools exist for its disclosure, ownership transparency in Croatia is still not ensured at a level that would fully allow insight into direct, indirect, and ultimate owners, nor is there a sufficiently strong system of oversight and enforcement to guarantee the full reliability and completeness of these data.

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

Although in previous years a Protocol and agreements were signed between journalists' organisations and the Ministry of the Interior with the aim of better protecting the safety of journalists in the field and in cases of threats or attacks, significant shortcomings in their implementation were observed over the past year. The agreements and protocols have remained largely formal and have been applied inconsistently in practice, as demonstrated in specific cases of threats, intimidation, and physical incidents targeting journalists. Problems in coordination, inadequate responses to urgent reports, and a lack of systematic training for police officers on the specificities of media work and the protection of journalists' rights indicate that far more effort and continuous on-the-ground training are needed to ensure journalists' real safety.

At the same time, serious challenges remain within Croatia's legislative framework that further undermine the safety and independence of journalists. The introduction of new criminal law provisions, in particular the so-called "Lex AP" (Article 307a of the Criminal Code), continues to create a legal environment in which legal tools

can be abused against journalists. Although this provision does not formally criminalise journalistic work, in practice it is evident that criminal and civil proceedings are often used against journalists who report on corruption, nepotism, political interference, and other issues of public interest.

Over the past year, no comprehensive and effective system has been established to respond to cases of abuse or threats reported through the Council of Europe Platform to promote the protection of journalism and the safety of journalists, nor have state institutions standardised procedures that would ensure rapid and appropriately coordinated protection in reported cases. As a result, journalists continue to face a sense of legal insecurity, a lack of preventive measures, and limited protection in situations involving threats, pressure, or legal attacks.

All of this points to the urgent need to strengthen practical mechanisms for protecting journalists, including consistent implementation of existing police protocols, systematic training of competent services on the specificities of media work, legal protection of sources and communications, and the development of rapid-response mechanisms for reports of attacks and threats. Without such concrete measures, formal provisions and declaratory policies remain insufficient to ensure the real protection of journalists and their professional independence in everyday work.

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

5000 character(s) maximum

In concrete situations, it has been shown that the protection of journalists in the field is not always timely and effective, that police officers do not act in a consistent manner, and that additional training and awareness-raising are needed regarding the role of journalists and their rights when reporting from high-risk events. At the same time, attacks, threats, and intimidation against journalists often do not result in a swift and effective investigation or in the sanctioning of perpetrators, which creates a sense of impunity and further increases journalists' insecurity. For this reason, it is necessary to further strengthen the operational capacities of the police and other competent authorities, including clearer procedures for protecting journalists in the field, effective communication with newsrooms and professional organisations, and ensuring that reports of attacks and threats are systematically monitored and prosecuted.

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

Although the right of access to information in Croatia is formally guaranteed, over the past year there have been no visible improvements in practice that would significantly increase the speed, consistency, and transparency of how public authorities respond to requests from journalists and the public. The system continues to show structural weaknesses through delays, the broad application of exceptions, and obstacles related to the classification of information, which limits the ability to inform the public in a timely manner on issues of public interest.

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

Over the past year, Croatia has continued to face a serious problem with a high number of lawsuits against journalists and media outlets, including proceedings that bear the characteristics of SLAPPs—strategic lawsuits aimed at exhausting, intimidating, and silencing those acting in the public interest. Such cases create strong financial and psychological pressure on journalists and newsrooms, encourage self-censorship, and weaken investigative journalism, especially when the plaintiffs are politically or economically powerful actors. A specific Croatian problem, which further complicates the fight against SLAPPs, is that journalists and media outlets are often so overwhelmed with lawsuits that they lack the capacity to systematically monitor and document each individual case. Due to this overload, a significant number of potential SLAPP cases remain unreported and do not enter databases or analyses, because classifying each case requires time, legal assessment, and resources that targets often do not have. This means that the true scale of the problem in Croatia is likely greater than what available data show, and the very pressure created by lawsuits makes it harder to prove that pressure, creating a vicious circle.

Over the past year, no effective mechanisms have been introduced to enable the swift dismissal of manifestly unfounded and abusive lawsuits, nor have systematic measures been put in place to provide journalists with stronger legal protection and reduce the risk of lengthy and costly court proceedings. Although the EU has adopted an Anti-SLAPP Directive establishing minimum standards of protection, it is limited in scope and primarily applies to cross-border civil proceedings, while the vast majority of SLAPP cases in Croatia are domestic in nature. Therefore, real protection will depend on whether Croatia establishes a strong national framework that covers domestic cases and goes beyond the minimum standards—something that has not happened over the past year.

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

5000 character(s) maximum

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

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

[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

[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

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

[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

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

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

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

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

5000 character(s) maximum

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

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