

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

Croatian Journalists' Association (HND)

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

<https://hnd.hr/o-hnd/>

HND is an independent professional association that brings together journalists and media professionals to protect media freedoms, promote ethical standards, strengthen professional working conditions, and advocate for journalism as a public good, public interest, and democratic values in the media space.

Founded in 1910, it is the oldest professional organisation of journalists in Croatia and brings together more than 1,500 journalists and photojournalists.

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

* 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

Hrvoje

Surname

Zovko

Email Address of the organisation

tajnistvo@hnd.hr

* 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

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

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

5000 character(s) maximum

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

► Step up efforts to strengthen the legal framework and oversight mechanisms to ensure a fair and transparent allocation of state advertising at national, regional and local levels, including the public tender procedure.

Although the Proposal for a Law on the Implementation of the European Media Freedom Act (EMFA) provides for the establishment of a Council for Media tasked with prescribing minimum criteria for the allocation of public funds, the key problem — the politically controlled method of appointing its members — remains unchanged. Despite unanimous objections from the professional and media community during the public consultation, the Government and the parliamentary majority refused to amend the disputed Article 7. As a result, the independence of the future regulator is compromised in advance, seriously calling into question the transparency of state advertising and public funding of media.

Moreover, the proposal, now waiting for the second reading in the Parliament, fails to address core systemic issues: the political dependence of the governing bodies of public media services (HRT and Hina), the financing of public media, transparency of media ownership, editorial independence, and the protection of journalistic sources. Announcements by the Ministry of Culture and Media that a new Law on HRT will only be adopted in late 2026 further postpone urgently needed reforms, while the Hina Act is not mentioned at all, even though the

director of the national news agency continues to be appointed by the parliamentary majority — just like the members of the Council for Electronic Media and the future Council for Media.

At the same time, the media space in Croatia is rapidly shrinking. The closure of Al Jazeera Balkans, mass layoffs at N1, the shutdown or marginalisation of several national and local media outlets, and the withdrawal of public funding from the weekly Novosti have severely undermined media pluralism. Precarious working conditions, salaries below the national minimum wage and the steady exodus of journalists from the profession continue to reduce the number of professional journalists. In the context of the global spread of disinformation on large online platforms, this erosion of the media ecosystem poses a serious threat to democracy.

►Continue efforts to address the issue of strategic lawsuits against public participation targeted at journalists, including by reviewing the legal provisions on defamation and encouraging wider use of procedural rules that allow dismissing groundless lawsuits, taking into account the European standards on the protection of journalists.

Only after sustained public pressure was the Croatian Journalists' Association (HND) included in the working group of the Ministry of Justice, Administration and Digital Transformation responsible for transposing the Anti-SLAPP Directive into Croatian law, as the sole representative of civil society and of those most frequently targeted by SLAPPs. While it is positive that the Directive will apply to domestic cases, the exclusion of criminal proceedings against journalists and media outlets leaves significant room for abuse. According to the latest information from the chairwoman of the working group preparing the Draft Law Proposal on the Protection of Persons Involved in Public Activities, the Draft Law Proposal is in the final stage. It will be sent for public consultation in the coming days, with the note that the working group's work is not complete. At least one more meeting is expected at which the working group should analyse the comments received on the Draft during the public consultation process.

The findings of the Media Freedom Rapid Response (MFRR) mission, published in February and updated in May 2025, confirm a prolonged stagnation of media freedom in Croatia. Key concerns include outdated media legislation, the compromised independence of HRT, the high prevalence of SLAPPs, economic and political pressures, verbal attacks on journalists by senior public officials, and restricted access to information. According to MFRR, the measures adopted so far are insufficient and inconsistent and have failed to bring about meaningful improvements for independent journalism. Unless urgent and comprehensive reforms are implemented, the space for free and independent journalism in Croatia will continue to collapse.

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

According to the Draft Act on the Implementation of the EMFA, the Council for Electronic Media will become the Council for Media, which acts as the management board of the future Agency for Media, now the Agency for Electronic Media. In the public consultation, all stakeholders objected to the method of electing the members of the coming Council for Media, in response to the Government's proposal, the ruling majority in Parliament. Despite the numerous comments against it, the proposer left Article 7 of the Proposal unchanged. The stakeholders that took part in public consultations warned that direct involvement of the Government in appointments of members of the Agency's managing body (the Council) may raise concerns regarding the Agency's independence, especially considering that such problems were already noted both in the Media

This concentration of appointment power in the hands of the parliamentary majority and government nominations is viewed as insufficient to ensure the Council's independence from political influence (MPM Country Report, Bilić 2025). We believe that, at a minimum, candidates should be proposed by the parliamentary Committee for the media, i.e. the Committee for Information, Informatisation and Media, after speaking with them at a public session, by a two-thirds majority of the Committee's members. Especially having in mind that, among other jurisdictions, the Council for Media will issue an ordinance prescribing the minimum criteria for the allocation of funds through a public call for the production and broadcasting of programs (Article 20, paragraph 2).

The future Agency for Media—derived from the current Agency for Electronic Media if the Draft Act on the Implementation of the EMFA is adopted—is also expected to play a role in assessing media sector market concentrations, a process conducted by the Competition Agency. The criteria on which the Agency for Media will base its assessments and opinions regarding the impact of concentration on media pluralism and editorial independence have yet to be developed by the Agency itself (Article 22 of the Draft Act on the Implementation of the EMFA).

Under Article 22 of the Draft Act, media service providers—other than on-demand services—must notify the Competition Agency in writing of any planned merger or acquisition that meets the legal thresholds for concentration under competition law. At the request of the Competition Agency, the Agency for Media must deliver an expert opinion within 30 days and, based on the "media plurality test" it develops, determine whether it is satisfied. Failure to submit it within the deadline is considered an indication that the Agency for Media has no objections. The Competition Agency then evaluates the merger and issues a decision in accordance with applicable competition rules. The Draft Act does not specify how to proceed when the opinions of the Agency for Media and the Competition Agency conflict. The new Media Act are expected to better align Croatia's anti-concentration legal framework with that of the EMFA.

During the planned establishment of the Agency for Media as the national media regulatory and legal successor of the Agency for Electronic Media, sufficient financial resources and appropriate powers should be ensured, taking into account the tasks assigned to them based on the EMFA, especially for requesting information and data from all natural or legal persons to whom this Regulation applies or who, for purposes related to their commercial, business or professional activity, can reasonably dispose of the necessary information and data.

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

According to Article 7 of the Draft Act, the Council serves as the Agency for Media's management board. It consists of seven members, one of whom is the President of the Council and one the Deputy President of the Council. The President and members of the Council, as proposed by the Draft Act on the Implementation of the EMFA, shall be appointed and dismissed by the Croatian Parliament, upon the proposal of the Government. In the procedure for proposing candidates for membership of the Council, the Government shall publish a public call for the nomination of candidates. This procedure involving the Government was criticised during public consultations. It essentially maintains the procedures of the current regulatory framework, under which seven members of the Council for Electronic Media, including its President, are appointed by Parliament on the basis of government nominations, a process that journalists' professional associations consider a political appointment. Some proposals in public consultations include a more transparent selection process, the public disclosure of all applicants, and hearings for Council candidates before the parliamentary committee for the media.

The Croatian Parliament also decides, upon the Government's proposal, to dismiss Council members before the end of their term of office. In public consultation, HND proposes that this authority be transferred to the Parliamentary Media Committee, and only after a prior assessment by an independent commission that determines whether there are grounds for dismissal. Before a decision on dismissal is made, the Council member should be allowed to express their opinion in writing. The dismissal must be explained and publicly announced, and the member has the right to appeal to the competent administrative court. If the Government initiates dismissals without an independent assessment mechanism, this opens the door to political influence and undermines the body's independence. In addition, vague expressions and overly broad formulations are repeated, such as "calls into question its reputation" or "the independence of the Agency", which are too subjective and open the door to abuse because they do not define who determines this and how. Also, there is no right to a statement, an appeal, or a transparent procedure, meaning due process is not guaranteed, which is contrary to EMFA.

Unlike the current model, in which the Council President also serves as the Agency's Director, the new model proposes separating these roles, potentially professionalising the Agency's Director. The dismissal of the Director of the Media Agency, according to the proposed law on the implementation of EMFA, is within the authority of the Council for Media. Here too, unclear reasons and overly broad formulations are repeated, such as "its reputation" or "the reputation of the Agency", which are set too subjectively and can be abused because it is not defined who determines it and how. We believe that, in this regard, it is necessary to adopt internal regulations, a code of conduct, or ethical principles that precisely prescribe the rules of conduct. Also, there is no right to a statement, appeal, or a transparent procedure, meaning due process is not guaranteed, contrary to EMFA.

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

5000 character(s) maximum

The European Media Freedom Regulation (EMFA) requires media service providers to strengthen internal safeguards to protect journalistic independence from unjustified interference. One of the key provisions of the current Media Act - the provision that prescribes the adoption and implementation of media statutes - has not been implemented in practice to this day, in its 32 years of formal existence. Media statutes, or editorial statutes, are an essential institution that should provide editorial staff, journalists, and editors with practical tools and mechanisms to preserve professional integrity, the rules of the journalistic profession, and ethical standards from unauthorised influences which can come from outside the media, as well as from ownership, management, and marketing structures within the media.

Louder warnings from the journalism profession and some intellectuals that publishers were ignoring the legal provision requiring adoption of a media statute did not reach the public until the spring of 2013. The new VAT Act, adopted in mid-June 2013, stipulates that general informative daily print media pay only a five per cent VAT rate, while a reduced VAT rate of 13 per cent is prescribed for general informative weeklies, biweeklies and periodicals. Article 38 of the new VAT Act, at the last minute, before the second reading of the Act in Parliament, included a provision according to which only those general informative print media that have adopted a media statute can enjoy this tax relief. However, there are no legal or institutional mechanisms for effectively implementing media statutes in the day-to-day operations of editorial offices, so in practice they serve only as a formal alibi for enjoying indirect state financial benefits in the form of a reduced VAT rate for the press. The Media Act and the Electronic Media Act do not contain provisions that specifically safeguard against political influence or ensure the autonomy of editors-in-chief in their appointment and dismissal. This indicator consistently shows the highest risk over time, suggesting that self-regulation is ineffective.

The Government of the Republic of Croatia, at its 126th session held on 6 November 2025, adopted the Action

Plan for the Development of Culture and Media for the period until 2027, which is financed from the Recovery Fund. The objective of improving the status of the journalistic profession and the media sector, and of encouraging pluralism, contains measure 4.2, which lists activities to strengthen the media statute as a self-regulatory act at the editorial level, representing an internal agreement between the editorial board and the publisher on mechanisms to protect editorial and professional journalistic autonomy. This is also an issue that the announced new Media Act should regulate, but the drafting of the proposal has not yet begun.

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

Despite existing legal provisions, political pressure and selective allocation of public funds continue to undermine fair and transparent state advertising in Croatia. A particularly illustrative case is the weekly "Novosti", a media outlet of the Serbian national minority in Croatia. The ruling coalition party, the Homeland Movement (DP), openly announced in its election programme and subsequent public statements its intention to cut public funding for Novosti. Although the Council for National Minorities is formally independent, it cut Novosti's budget by 30% in 2025. Reacting to DP's announcement on further cuts for Novosti in 2026, the MFRR consortium formally addressed the Prime Minister in December 2025, warning of unlawful political interference and calling for the protection of minority media and the independence of funding bodies.

The Media Ownership and Financing platform, managed by the Agency for Electronic Media (AEM) and developed with EU Recovery and Resilience Facility funds, provides publicly accessible data on ownership structures and revenue sources for electronic media, including state and local funding. Therefore, state advertising should be more transparent in the future, since both media and public bodies are obligated to report to the Council and face now-prescribed fines for violating this legal obligation.

In terms of transparency, the Act on Electronic Media, effective from 22.10.2021, requires public bodies or entities to allocate funds through public calls. Yet, without explicit guidelines or criteria for fairly distributing state advertising to media outlets, their allocation depends on discretionary decisions and, most often, on the will of political leaders. Contracts between local authorities and media frequently mandate promotional content disguised as editorial material.

Draft Act on the Implementation of EMFA foresees that the future Council will set minimum criteria for Media (Article 20, paragraph 2), but the political method of appointing that body raises serious concerns about its independence and its ability to safeguard transparency in practice. The Agency for electronic media has over 20 years of experience in allocating resources from the Fund for the encouragement of pluralism and diversity of electronic media (Pluralism Fund). However, there is no regular research on the effects of the Fund, or on how the invested funds have translated into greater citizen awareness or into the quality of information offered to them in the media.

As for the indirect state subsidy, the surplus funds publishers received from the VAT reduction were first in 2007, and then again in 2013. They are not invested in strengthening the social role of print media, improving working and professional standards, or the professional position of journalists. The same applies to the Government Decision in February 2025 on designating the service of print distribution in the territory of the Republic of Croatia as a service of general economic interest. After a public tender in June 2025, a contract was signed for the provision of print media distribution services as a service of general economic interest

between the Ministry of Culture and Media and the Croatian Post. Although the Ministry of Culture and Media claims that by signing this contract, they have resolved the issue of print media distribution in the next five years and given additional impetus to the development of professional journalism, no content classification of daily and weekly print media has been made that would determine which media are of a general informative character and of public interest, that the provision of distribution services is designated only for them, and that this state subsidy is not given to print media whose content consists mainly of advertisements. Nor does the new media regulation offer guarantees that decisions on subsidising the development of professional journalism will be made in a strategic, deliberate manner in the future, and not, as before, "ad hoc".

According to the funding models HND has already proposed for local media, HND advocates establishing a national fund for journalism that would publicly and transparently finance the press in accordance with the profession's rules. So far, HND Models have been accepted in Zagreb, Split, Pazin, Makarska, Pula and Križevci.

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

Among the biggest concerns for media freedom in the country, the proposed law won't address is the independence of public service media. Croatia is classified as a medium-risk country in the Media Pluralism Monitor's assessment of Public Service Media (PSM) independence. However, it scores a very high risk on PSM governance. This stems from the legal framework, which does not provide appointment procedures that safeguard PSM management from Government or other political influence. This issue is also reflected in practice, both in the appointments of management and the director-general, and PSM's changes of editorial line (MPM Country Report, Bilić, 2025).

The MFRR report, however, recognised the direct interference of politics, i.e., state institutions, in the management of HRT, by politicising the process of appointing management bodies through a simple majority in the Croatian Parliament. The MFRR therefore recommended the following: consider introducing, if possible, a two-thirds majority for the shortlisting of candidates for the HRT Supervisory Board from the Committee for Information, Informatization and Media of the Croatian Parliament and an additional two-thirds majority for voting in the Croatian Parliament; improve the transparency of the selection process, strengthen the criteria for the experience and qualifications of candidates and the rules on conflict of interest for candidates; strengthen the role of the HRT Programming Council; develop a clear strategic plan for the future of the public service,

including ensuring secure and sufficient funding for HRT to carry out its public service mandate without political interferenceHRT's.

HRT's independence has been further undermined by the stagnation of fee revenues, which have not changed since 2010, and by recent agreements to co-finance HRT from the state budget, potentially introducing even more pronounced government influence on the program. While there is a need to reconsider the long-term sustainability of PSM financing, the revision of the Croatian Radio Television Act will need to address EMFA independence requirements in particular. These requirements ensure that public service media providers are editorially and functionally independent and that the procedures for appointing or dismissing the head of management or members of the management board are designed to safeguard this independence, which is not provided by the current legal framework and practice in Croatia.

With the legislative plan, the Ministry announced the adoption of the new Law on HRT. Still, the changes to the Law on Hina are not mentioned, even though the recently appointed new director was elected on the proposal of the Government by the votes of the ruling majority in the Parliament, which in no way guarantees the political independence of the news agency, just like HRT or the future Council for Media (now the Council for Electronic Media) whose members are elected in the same way.

[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

The Media Ownership and Financing platform accessible through the AEM website provides general information about media outlets, so far only for the electronic media, which displays ownership information drawn from official registers. On the other hand, silent owners of the media, legalised by the Companies Act, Chapter III, Articles 148 to 157, are not obliged to be listed as owners in the register of beneficial ownership.

Despite the Electronic Media Act stating that secret ownership agreements are null and void, this has no impact, for example, on the award of concessions, on the investment of public funds, or ultimately on media pluralism and editorial independence. The Council for Electronic Media reiterated that it does not have the authority to determine real ownership, as the tax administration or the police do. The most recent such case was in January this year after the announcement by the local Zagreb television Z1 to stop broadcasting "Bujica", a show broadcast by several local TV stations by author Velimir Bujanac, for whose spread of hate speech the Council for Electronic Media punished Z1 television by withholding funds from the Pluralism Fund, which allows many local electronic media to survive. The show's author, Velimir Bujanec, indirectly accused MP and leader of the DOMiNO party, Mario Radić, of being the real owner of Z1 television and the person behind the decision to cancel the show, sparking a public conflict between the two.

As part of the public consultation on the Draft Law on the Implementation of EMFA, the HND warned about the issue of secret media owners who are not required to be listed in the Register of Beneficial Ownership. This raises the issue of assessing the actual concentration or violation of media ownership restrictions. Although Article 61, paragraph 5 of the Electronic Media Act declaratively prohibits concealing the ownership structure of media service providers, without any real legal effect, it should at least stipulate an obligation to declare the existence of secret companies under Article 148 of the Companies Act and give the Media Agency the authority to verify media declarations on the existence of a secret company. HND would also advocate that media outlets with silent partners do not have access to direct or indirect public budget support.

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

The Media Act formally recognises the protection of sources. Still, it does not provide the procedural mechanisms EMFA requires to make this protection truly effective and legally sustainable - especially in the context of potential surveillance or the use of spyware. The Law on the Security-Intelligence System enables surveillance without exemptions or proportionality assessments for journalists or sources. The Criminal Procedure Act (CPC) regulates in detail the types of secret measures, the conditions under which they may be used, and the procedures for their use. The court assesses justification, but the law does not prescribe a special proportionality assessment for journalists. Defendants have the right to protest and appeal, but journalists, as non-defendants, often have no information that they were under measures. The Penal Code does not provide for criminal liability for the abuse of supervisory authority over journalists (e.g., through the use of spyware). There is no obligation to notify affected journalists when surveillance ends, nor is there any additional protection for the profession or source as a sensitive category, as EMFA explicitly requires. Furthermore, current court administrative procedures risk exposing journalists' personal information to alleged perpetrators.

For example, police officers from the Split Police Department recently had to check the residence address of journalists Boris Dežulović and Viktor Ivančić after the Croatian Victimology Society and the Society of Croatian Political Prisoners reported them. In accordance with Article 12 of the Residence Act, the police department is obliged to act and verify whether a person resides at the registered address. Every citizen can provide information to the police or file a report if they suspect a violation of regulations within the police's jurisdiction, after which the police conduct checks to verify the allegations.

Similarly, Lex AP, i.e., Article 307a of the Croatian Criminal Code, which penalises the unauthorised disclosure of investigative or evidentiary content, is in direct conflict with the EMFA. Although journalists are exempt from this provision, the police and prosecuting authorities, to identify the person who violated Article 307a, can carry out urgent evidentiary actions and investigations, including requesting the inspection and forensic analysis of devices held by journalists who published such content, such as computers, laptops, or mobile phones used for journalistic work.

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

5000 character(s) maximum

During 2025, the SafeJournalists database [<https://safejournalists.net/>] on attacks on journalists recorded 30 attacks on journalists in Croatia, including three physical attacks and two inappropriate actions by police officers, as well as six death threats. The most significant number of death threats (four out of six) was related to calling journalists Chetniks, as well as threats to editorial offices, of which the most significant number of threats were recorded to the editorial offices of the weekly Novosti and television N1. This is also the most attacks and threats recorded in one year, except for 2022, when 34 were recorded, of which as many as 18, according to the editorial office of the Faktograf portal, due to its verification of disinformation about COVID. It should be borne in mind that journalists rarely report threats because they have become an everyday part of their work, and many perceive them as part of their job.

The MFRR, addressing this topic, concluded in its report that journalists in Croatia face significant political

pressure, especially at the local level, with increasing incidents of verbal and physical abuse, defamation campaigns and economic hardship. It highlighted the attack on journalist Melita Vrsaljko, threats to the weekly Novosti after HDZ's coalition partner, the Homeland Movement, called them enemies of Croatia, and verbal abuse, often coming from officials, as the most widespread form of attack on journalists in Croatia. Croatian law does not contain explicit provisions that directly protect journalists. Still, Article 315 b of the Criminal Code refers, among other things, to coercion against people performing tasks of public interest, including journalists. In September 2023, the Croatian Journalists' Association and the Trade Union of Croatian Journalists (SNH) signed a cooperation agreement with the Ministry of the Interior, including two protocols aimed at protecting journalists.

Police protocols are effective in Zagreb and some larger cities (Osijek and Split). In contrast, in smaller areas, as practice has shown, the police are either not sufficiently informed about them or do not adhere to them for other reasons. However, in the case of the attack on the N1 television crew or in the case of the brutal attack on colleague Darije Topić from Osijek, the police qualified them as a criminal offence against persons performing work of public interest. Last year, the Attorney's Office filed indictments for the attack on Dario Topić in Osijek, as well as for the attack on Melita Vrsaljko on her doorstep, and for the death threats to colleague Jurica Gašpar. At the end of last year, the HND approached the Ministry of Justice, Administration and Digital Transformation with a proposal to negotiate similar protocols with judicial authorities. Still, we have not received a response to date.

The MFRR also made recommendations to the Government on the safety of journalists:

- ensure that the protocol for criminal offences against journalists is applied equally across all media outlets and geographical regions, with clear and transparent criteria for its initiation, impartial judicial oversight and open reporting of decisions taken,
- ensure comprehensive, mandatory training for all police officers and prosecutors on when and how to apply the protocol on the safety of journalists, with a thorough cooperation programme that encourages the development of a culture of the role and values of journalism among law enforcement agencies,
- urgently amend police reporting procedures to enable organisational rather than individual reporting of threats and journalists' personal data – in particular their home addresses – from being shared with alleged perpetrators,
- encourage media outlets to develop internal security policies in cooperation with trade unions and civil society,
- implement Article 4 of the EMFA to ensure strict protection of journalistic sources and communications, transparent and complete access by journalists to the processing of their personal data, and a simple and effective judicial remedy for journalists whose rights have been violated.

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

The Media Act does not prescribe a deadline within which executive, legislative and judicial bodies, local and regional self-government bodies, as well as other legal and natural persons performing public service and/or duties are obliged to provide journalists with requested information on issues within their scope of competence. The deficient implementation of the Right to Information Act further undermines journalists' ability to investigate and report effectively. Public institutions exploit loopholes or invoke confidentiality and data protection to deny access without properly balancing these factors with the public interest in disclosing the requested information. At the same time, complaints to the Information Commissioner are lengthy and rarely lead to timely solutions.

Investigative journalists, especially those working on politically sensitive topics, face the most significant challenges, affecting media freedom and the public's right to know, the MFRR mission found.

The Commissioner's office handles, among other things, complaints – from both citizens and journalists – against public authorities that deny access to information. In 2024, the Information Commissioner received over 1,000 complaints regarding access to information, with over half due to “administrative silence” (MPM Country Report, Bilić 2025). In other words, public authorities failed to respond to such requests whatsoever. At the end of 2024, the Ministry of Justice, Administration, and Digital Transformation announced the formation of a working group to prepare a draft proposal for amendments to the Law on the Right to Access to Information, but to date, there is no information about the planned changes.

The policy of secrecy is also reflected in the introduction of a new criminal offence for disclosing information from criminal proceedings. Although the Croatian competent authorities pointed out that no potential amendment to the law would affect the work of journalists or the protection of their sources, we consider this legislation to be a direct attack on freedom of speech and freedom of receiving information. In a democratic state, the public has the right to be informed about the procedures conducted by public bodies of public interest, but this law prevents it. Its introduction hides criminal proceedings against high state officials from public scrutiny by deterring sources from cooperating with journalists, severely hampering investigative reporting and the corroboration of stories.

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

Lawsuits with disproportionately serious damage claims are putting additional pressure on the media. According to the latest annual survey by the HND (January 2025), by the end of 2024, there were 696 active lawsuits in 10 media outlets that responded to the questionnaire. Of these, 22 were criminal proceedings, 45 were with a request for correction, and 629 were civil lawsuits with damage claims. Among the last 313 lawsuits, the total amount of damage claims was 3.1 million euros, although Hanza Media did not send the amounts. However, according to data from the court decision search engine, it is evident that Hanza Media had claims totalling 603,256.20 euros in 97 court cases, as reflected in court decisions issued during 2024 and 2025.

In addition to the high claims, the length of proceedings is also a problem, as is evident from research conducted by the HND with the Miko Tripalo Centre based on the analysis of 1,333 court decisions in the period from 2016 to 2023, according to which the proceedings concluded with final decisions lasted an average of 4.3 years.

The HND is the only representative of civil society, i.e., the most frequent targets of SLAPPs, in the Ministry of Justice, Administration and Digital Transformation's working group preparing a draft law proposal to transpose the Anti-SLAPP Directive into Croatian legislation. According to the latest information from the Ministry, the Draft Proposal for a Law on the Protection of Persons Involved in Public Activities is in its final stage. It will be sent for public consultation in the coming days, with the note that the working group's work is not over. At least one more meeting is expected, at which the working group should analyse the comments received on the Draft during the public consultation process.

For now, it's known that provisions of the Directive will also apply to national cases without cross-border implications. The Draft also introduces protective measures, or procedural guarantees, so the court may order the plaintiff to deposit security for the estimated costs of the proceedings, which could deter the plaintiff from

excessive compensation claims, but only upon a reasoned request from the defendant. Upon a reasoned request from the defendant, the court may also reject the claim as manifestly unfounded, and fines for SLAPP plaintiffs are also introduced, which are paid into the state budget to the division of the Ministry responsible for justice, for the activity that provides funds for the provision of free legal aid.

The provisions of the Anti-SLAPP Directive will not, however, apply to criminal proceedings. The Croatian Criminal Code still penalises defamation and insult, which are key provisions undermining media freedom. Overly broad and vague provisions enable the prosecution of journalists for any statement deemed 'false'. Criminal prosecution is often accompanied by civil lawsuits, creating a double burden that entangles journalists in lengthy, costly legal proceedings. Regarding the definition of SLAPP, only the first indicator from the Council of Europe's recommendations for countering SLAPP is added to the definition set out in Article 4 of the Anti-SLAPP Directive.

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

efcab429-ebc5-49ff-b7c0-d374ec8f6adb

/Action_Plan_for_the_Development_of_Culture_and_Media_2027.pdf

2f620204-6fc0-46d3-92e5-316747fa67cc/EESC-Report-Labour-rights-for-journalists.pdf

f08f4199-8922-468b-b0ad-00dbd4c3e38f/MFRR-Croatia-Report-2025.pdf

dc0fdc44-20a3-4c2b-a6c5-01b74484c773/MFRR_ReportUpdate.pdf

199a900f-b286-4368-959e-f619b5a5148d/Open-letter-to-Croatian-Prime-Minister-Plenkovic__-MFRR-raises-alarm-over-unlawful-political-pressure-against-weekly-Novosti.pdf
c2d5915a-8d1e-4adf-9cb0-d61fede9d6b4/SLAPP_Report_final_eng-3.pdf

Contact

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