

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

International Press Institute (IPI)

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://ipi.media/>

IPI is a global network of journalists defending media freedom and independent journalism wherever they are threatened.

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

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* 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

If "Other", please specify

Please indicate the country of origin of your organisation

United Kingdom

First name

Jamie

Surname

Wiseman

Email Address of the organisation

jwiseman@ipi.media

*** 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

Even though the European Media Freedom Act (EMFA) came into force on August 8, 2025 Hungary has not taken any steps toward its implementation. The Hungarian government has instead framed the EMFA as yet

another tool of “Brussels” to interfere in the country. Already in 2023, Prime Minister Viktor Orbán referred to “an Orwellian world” in a tweet, claiming that the bill aims to take total control of the media and comparing it to Soviet and Nazi regimes. Since then, Hungary has formally contested several aspects of the EMFA before the Court of Justice of the European Union. The government argues that the act lacks a proper legal basis, violates national sovereignty, and infringes key EU principles, and therefore seeks the annulment of several provisions of the EMFA. Consequently, there have been no changes regarding the lack of independence of the media regulator and public service media, the misuse of state funds to influence media output, or media pluralism and political influence over news media. As a result, Hungary continues to suffer from the strongest model of media capture ever developed within the European Union, with severe repercussions for free, independent and pluralistic journalism.

Relevant IPI statements

<https://ipi.media/hungary-rfe-service-shuttered-by-trump-administration-for-opposing-ally-orban/>

<https://ipi.media/hungary-new-eu-media-board-should-assess-blikk-acquisition-by-pro-government-media-group/>

<https://ipi.media/hungary-ipi-welcomes-legal-action-against-hungary-over-eu-media-freedom-act-violations/>

<https://ipi.media/hungary-media-freedom-in-crisis/>

Key statement - <https://ipi.media/hungary-foreign-funding-bill-poses-most-serious-threat-to-independent-media-in-years/>

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

In Hungary, the implementation of Article 30 of the Audiovisual Media Services Directive (AVMSD) on the independence of media regulators reveals significant discrepancies between local legislation and the requirements of EU law. While the National Media and Infocommunications Authority (NMHH) is legally framed as an independent body, the reality is starkly different. The ruling Fidesz party's full control over the appointment of the NMHH's president and members of its Media Council undermines their operational independence. This situation is aggravated by the lack of transparency in the nomination process, where appointments reflect the interest of the government and the ruling party rather than the intended impartiality outlined in the AVMSD and equally required under the European Media Freedom Act (EMFA). Moreover, the realistic achievement of the EMFA's goals is compromised by the NMHH's biased regulatory actions. Reports indicate that a significant majority of media tenders favour outlets aligned with the ruling party, and the authority have often prioritised progovernment interests in media mergers and frequency allocations. Such practices not only threaten media pluralism but also facilitate the dissemination of government propaganda, further eroding the public's access to diverse and independent journalism. In other cases, the Media Council is alleged to have taken unjustified and discriminatory licensing decisions against media critical of the government, further eroding media pluralism. Therefore, while the legal framework suggests adherence to EMFA standards, the execution of these laws demonstrates a departure from their core principles, reflecting a broader trend of governmental control over media regulation.

In 2010, Hungary's newly elected government, led by the Fidesz party, used its two-thirds parliamentary majority to implement a new media law. This replaced the former regulatory body with the National Media and

Infocommunications Authority (NMHH), which oversees both media and telecommunications. The new regulatory framework also established the Media Council, an autonomous body within the NMHH. Its role is to monitor and enforce media laws. The NMHH, established under Act CLXXXV of 2010 on Media Services and Mass Communication (media law), defines itself as an independent regulatory body, reporting annually to Parliament. The Media Council is a key player in this structure. Members of the council are elected by parliament, requiring a two-thirds majority vote of those present. In accordance with the media law, the Media Council and its members are subject only to the relevant legislation and are not instructed with respect to their activities. 4 5 However, despite the provisions for independence, the practical realities of the situation indicate otherwise. The authority's independence is significantly undermined by the regulations governing the election of its members and its overall operations. In practice, the ruling party, Fidesz, is responsible for all personal decisions regarding the authority. The President of Hungary appoints the head of the NMHH on the Prime Minister's proposal, who also serves as the head of the Media Council pending approval in Parliament.

A number of organisations have highlighted concerns regarding the authority's independence, as evidenced by their reports and analyses. In light of the ruling party's two-thirds majority in Parliament, it is evident that both the NMHH and the Media Council are effectively under the control of the government and Fidesz. This is particularly evident in the appointment of candidates to the Media Council, with the government and Fidesz appointing their own individuals to all five seats. This control was further reinforced ahead of the 2022 elections when the Council's previous chairperson resigned early, allowing Fidesz to appoint a new head for a nine-year term. The Prime Minister's de facto power to select the authority's chairperson gives rise to concerns that the interpretation of media laws, and thus the constitutional rights of free expression and public information, may be subject to political control.

<https://ipi.media/wp-content/uploads/2025/12/HUNGARY-Media-Capture-Monitoring-Report-Overview-1.pdf>

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

The authority and its members are bound by the law and their tasks may only be defined by law or by legislation adopted in accordance with the law. It should be noted, however, that the decisions of the authority frequently reflect the intentions of the government. To illustrate, the Media Council's decision-making on market entry regulations and frequency tendering for linear radio services from 2011 to 2013 was perceived to be biased, which had an adverse impact on media pluralism. Successful applicants frequently resulted in a reduction in market plurality. Further research revealed shortcomings in the standard-setting and law enforcement processes for media content, indicating a lack of compliance with the rule of law and inadequate protection of citizens' rights. The authority's independence was called into question due to the fact that decisions were made without debate or opposing votes, a pattern that was observed on a regular basis. There is no representative of the opposition or of an independent NGO on the regulatory authority. The members of the Media Council were appointed exclusively by government party votes in 2010 and 2019. In October 2019, the opposition sought to propose candidates for the Media Council, as the tenure of the incumbent members was nearing its conclusion. However, the Fidesz party impeded the ad hoc parliamentary committee responsible for these nominations, thereby preventing it from carrying out its function. Fidesz did not propose any candidates, and without the governing party's votes, the committee was unable to proceed. 25 At the end of December 2019, the president of the ad hoc committee, an MP representing the Fidesz party, announced the names of the nominees for the council membership. Only candidates nominated by the governing party were subsequently elected by parliament. Following the resignation of President Mónika Karas in 2021, Fidesz was able to appoint András Koltay as the new president for a nine-year term.

<https://ipi.media/wp-content/uploads/2025/12/HUNGARY-Media-Capture-Monitoring-Report-Overview-1.pdf>

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

5000 character(s) maximum

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

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

5000 character(s) maximum

An analysis of Hungary's compliance with Article 25 of the EMFA, concerning the misuse of state funds to influence media output, reveals a disappointing reality. There are no legal provisions ensuring fair and transparent distribution of state advertising, allowing the government to allocate funds based on political allegiance rather than objective criteria. This lack of alignment with the EMFA is compounded by the dominance of state-sponsored advertising, which has become a major source of influence over media output, benefitting government-aligned outlets while marginalising independent media. The centralised allocation of state advertising funds not only serves to reinforce progovernment narratives but also constrains the financial viability of independent media, which struggle to compete against well-funded, government-supported entities. The absence of transparency in state advertising contracts and a lack of independent oversight or monitoring mechanisms further aggravates the issue. Despite efforts from civil society to document and challenge these practices, their impact remains minimal. The implementation of EMFA's Article 25 in Hungary falls short, undermining media pluralism and freedom of expression.

Hungary's compliance with Article 25 of the EMFA, regarding misuse of state funds to influence the media, is deeply concerning. The country lacks legal provisions for fair distribution of state advertising, allowing politically-motivated fund allocation. This noncompliance is worsened by the dominance of state-sponsored advertising, which heavily influences media output, favouring government-aligned outlets over independent ones. The allocation of state advertising funds reinforces pro-government narratives and hinders independent media's financial viability. The lack of transparency in advertising contracts and absence of independent oversight exacerbate the issue. Despite civil society efforts to challenge these practices, their impact remains limited. Hungary's implementation falls short of EMFA's Article 25, undermining media pluralism and freedom of expression.

Furthermore, the government can leverage tax incentives, strategic partnerships, and rigorous regulatory oversight to influence the actions of businesses, including commercial advertisers, in alignment with its interests. This has prompted many commercial advertisers to avoid independent media outlets, which has further eroded the financial viability of those that do not align with the government's narratives. The allocation of state advertising in Hungary is subject to significant political influence, with a discernible bias towards media outlets that align with the ruling party. For years, state advertising has served as a covert form of support for government-aligned outlets, with several of these organizations relying almost entirely on this source of revenue. 103 State advertising is not solely a conduit for promoting government-friendly media outlets; it is also a vehicle for disseminating messages that advance the interests of the governing party. State advertising is managed through a centralised system by the National Bureau of Communications (NKOH), subordinate to the minister heading the Prime Minister's Office. This practice has the effect of undermining media pluralism and of distorting the level playing field that is essential for a free and independent press. Since 2010, the Hungarian

government has strategically allocated state advertising to media companies owned by pro-government businesspeople. The Central European Press and Media Foundation (KESMA), a group of pro-government media outlets, has been a substantial beneficiary of this system. These outlets receive significant financial support from the state, with up to 75%-80% of their total revenue deriving from state advertising. This high level of financial dependency enables these outlets to operate without regard for market forces or audience demand, effectively shielding them from the economic challenges that typically affect media organisations.

In contrast, independent media outlets are experiencing significant financial challenges as they strive to maintain competitiveness in the face of well-funded, government-backed competitors. The rationale provided by the government for these actions is frequently presented as a means of promoting media pluralism. However, in practice, this approach actually serves to undermine media diversity by reinforcing pro-government narratives and marginalising independent voices. This selective support increases the vulnerability of independent outlets, further contributing to Hungary's democratic backsliding.

<https://ipi.media/wp-content/uploads/2025/12/HUNGARY-Media-Capture-Monitoring-Report-Overview-1.pdf>

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

The media law stipulates that public service media (PSM) is to operate independently of the state and economic actors, thereby ensuring professional autonomy for leaders and participants within public media organisations. The law also established the Public Service Foundation (Közszolgálati Közalapítvány) to ensure the independence of public media. The Duna Media Services Nonprofit Ltd. is the owner of the public service broadcaster, which was established in 2015 through the merger of previous radio and television stations and the state news agency. The initial capital and founding documents of the Foundation were approved by the Hungarian Parliament. The media law also established the Media Service Support and Asset Management Fund (MTVA), a state-managed financial entity overseen by the Media Council. The MTVA centralises funding and content production for all public service media under a single body. MTVA's primary function is the production of content for Duna Media Services. This centralised control enables the government to exert significant influence over the content produced by public service broadcasters, ensuring alignment with the ruling party's political objectives. "No legislative or policy changes have been adopted or proposed to address concerns about how public service media is run, especially about government influence. Furthermore, the media law introduced the Public Service Code, which sets out the fundamental principles of public service

media in line with the legislation and provides guidance on the proper functioning of public media services. The Code addresses critical matters such as the means of attaining legal objectives, maintaining autonomy from political parties, guaranteeing the diversity and equilibrium of news and political programming, and presenting a wide array of opinions and perspectives. Despite the legal framework in place to protect the independence of public service media, there is a notable discrepancy between the legislation and its implementation. The Hungarian PSM is widely perceived as being subject to direct governmental control.

Further evidence has emerged from leaked communications and testimonies which indicate the extent of government involvement in the editorial processes at the PSM. An audio recording from 2019, which has since been leaked, captured an influential editor instructing his staff that the institution does not support the opposition coalition and that anyone who disagrees should resign. Other leaked emails and sources within the PSM indicated that ministry press officers regularly contact PSM journalists, dictating which aspects of a story should be emphasised or omitted. The existence of this direct line of communication from government ministries to PSM reporters serves to illustrate the extent to which the government exerts control over the media. A new series of leaked recordings also revealed widespread censorship favouring the government, the influence of pro-government bias in the selection of commentators and experts, and the efforts of editors to ensure reporting aligns with the expectations of the minister heading the Prime Minister's Office.

<https://ipi.media/wp-content/uploads/2025/12/HUNGARY-Media-Capture-Monitoring-Report-Overview-1.pdf>

[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 Hungarian laws comply only partially with Articles 6 and 22 of the EMFA on media pluralism and political /state influence over news media. While Hungarian media law mandates transparency on basic operational information, it does not require the disclosure of detailed media ownership. This shortfall is worsened by the absence of comprehensive legislation governing the transparency of ownership structures, which weakens accountability despite the registration requirements enforced by the media authority. Although journalists and researchers often uncover beneficial owners, this is not the result of legal enforcement. Furthermore, media pluralism is undermined by the consolidation of media ownership among pro-government entities. While Hungarian legislation theoretically includes safeguards to prevent excessive media market concentration, these measures are inconsistently applied. Regulatory authorities have blocked mergers when convenient, however, transactions that expand government-aligned media influence, such as the creation of KESMA, a foundation controlling hundreds of media outlets, was classified as of national strategic importance, which prevented the launch of any investigations. This selective enforcement compromises editorial independence and reduces diversity in news content, reflecting a failure to align with EMFA's goals of promoting transparency and safeguarding media pluralism in Hungary.

<https://ipi.media/wp-content/uploads/2025/12/HUNGARY-Media-Capture-Monitoring-Report-Overview-1.pdf>

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

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

5000 character(s) maximum

All MFRR Mapping Media Freedom alerts in Hungary from 2025 - <https://www.mapmf.org/explorer?f.year=2025&f.country=Hungary&show=list&sort=timestamp%3Adesc>

One physical attack - <https://www.mapmf.org/alert/33807>

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

5000 character(s) maximum

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

5000 character(s) maximum

MFRR Mapping Media Freedom alerts in Hungary from 2025

Legal cases - https://www.mapmf.org/explorer?f.year=2025&f.country=Poland&f.type_of_incident=Legal+incident&show=list&sort=timestamp%3Adesc

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

5000 character(s) maximum

The Hungarian laws comply only partially with Articles 6 and 22 of the EMFA on media pluralism and political /state influence over news media. While Hungarian media law mandates transparency on basic operational information, it does not require the disclosure of detailed media ownership. This shortfall is worsened by the

absence of comprehensive legislation governing the transparency of ownership structures, which weakens accountability despite the registration requirements enforced by the media authority. Although journalists and researchers often uncover beneficial owners, this is not the result of legal enforcement. Furthermore, media pluralism is undermined by the consolidation of media ownership among pro-government entities. While Hungarian legislation theoretically includes safeguards to prevent excessive media market concentration, these measures are inconsistently applied. Regulatory authorities have blocked mergers when convenient, however, transactions that expand government-aligned media influence, such as the creation of KESMA, a foundation controlling hundreds of media outlets, was classified as of national strategic importance, which prevented the launch of any investigations. This selective enforcement compromises editorial independence and reduces diversity in news content, reflecting a failure to align with EMFA's goals of promoting transparency and safeguarding media pluralism in Hungary.

<https://ipi.media/wp-content/uploads/2025/12/HUNGARY-Media-Capture-Monitoring-Report-Overview-1.pdf>

Aligning with EMFA's general provisions: what is needed?

The NMHH and the Media Council are currently fully controlled by the ruling Fidesz party due to its super majority in parliament. New measures should be introduced to ensure the political independence of the media regulator. Proposals include: Ensure a transparent and inclusive appointment process: Reform the selection process for the President of the NMHH and the Media Council to include various stakeholders, such as opposition parties, civil society, and independent experts. Limit government influence in regulatory appointments: Introduce legal requirements to consider recommendations from professional bodies, civil society and opposition parties. Shorten the terms of key positions: Revise the current nine-year terms for the President of the NMHH and members of the Media Council to a shorter term to reduce the risk of long-term political entrenchment and ensure regular oversight. Introduce conflict of interest rules to prevent political appointees or members of the ruling party from holding positions in media regulatory bodies or having undue influence on media-related decisions.

Further enhancing the media environment: what is needed?

Clarify appeal mechanisms and strengthen judicial oversight: Amend the legal framework to allow for effective judicial review of the Media Council's decisions. Increase transparency: Implement systematic and transparent publication of all meeting minutes, decision rationales, and all stakeholder input. Establish independent monitoring and accountability mechanisms: Establish an independent oversight body composed of diverse representatives tasked with overseeing the activities of the regulator. Prevent political bias in licensing and media mergers: Develop objective criteria for frequency allocation and media merger assessments, with an independent committee reviewing high-stakes decisions.

Public media. Aligning with EMFA's general provisions: what is needed?

Strengthen the legal framework for editorial independence: Amend the media law to explicitly prohibit political appointees from holding key editorial positions in public media. This should include a requirement that senior editorial staff be selected by independent bodies. Reform governance structures: Change the composition of the Public Service Foundation Board of Trustees to reduce the dominance of politically appointed members. Increase transparency in financial oversight: Introduce legal changes to decouple the MTVA from government control and ensure that budget allocations and expenditures are transparent and independently monitored. This should include ending the annual budget approval by parliament and ensuring a long-term budget that is not subject to arbitrary political decisions and negotiations. Redefine the role of the Media Council: Implement legal safeguards to limit the Media Council's ability to appoint and dismiss senior PSM staff. Introduce a requirement for bipartisan parliamentary approval of such appointments to prevent partisan capture.

<https://ipi.media/wp-content/uploads/2025/12/HUNGARY-Media-Capture-Monitoring-Report-Overview-1.pdf>

Relevant IPI statements

<https://ipi.media/hungary-rfe-service-shuttered-by-trump-administration-for-opposing-ally-orban/>
<https://ipi.media/hungary-new-eu-media-board-should-assess-blikk-acquisition-by-pro-government-media-group/>

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

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

