

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

Mertek Media Monitor

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://mertek.eu/en/>

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

395115818788-17

* 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

Agnes

Surname

Urban

Email Address of the organisation

info@mertek.eu

* 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

The Hungarian government has not complied with the recommendations contained in the 2025 Rule of Law Report. Similarly, it has not implemented the European Media Freedom Act (EMFA) (Regulation (EU) 2024 /1083), which came into force on 8 August 2025, but no legislative or regulatory measures have been taken so far. In December 2025, the European Commission opened an infringement procedure against Hungary for failing to comply with several provisions under the EMFA and certain requirements under the Audiovisual Media Services Directive (AVMSD) (Directive (EU) 2018/1808).

The European Commission recommended to “introduce mechanisms to enhance the functional independence of the media regulatory authority taking into account European standards on the independence of media regulators”. There have not been any developments in this field since the 2025 Rule of Law Report.

The European Commission also recommended to “adopt measures to ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies”. State advertising continues to distort the market and the entire Hungarian public sphere, with no change in this area. The transparency of state advertising has not improved either, even though this should have been changed since the EMFA came into force. Following a new public procurement tender, the National Communications Office concluded a new framework agreement in October 2025 again worth HUF 75 billion (€ 189 million). There is also an option for two extensions, so the actual value of the agreement is HUF 225 billion (€ 566 million).

Finally, the European Commission recommended to “strengthen the rules and mechanisms to enhance the independent governance and editorial independence of public service media taking into account European standards on public service media”. There were no legislative or regulatory changes in 2025 in this regard either. In addition to disregarding the recommendations, Hungary fails to comply with the EMFA’s provisions on public service media.

The above-mentioned problem areas are also analysed in reports published by monitoring institutions like the International Press Institute or Mertek Media Monitor.

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

The issues raised in our previous contributions to the Rule of Law Reports still prevail.

The National Media and Infocommunications Authority (NMHH) is a convergent authority, which operates as regulator of the telecommunications and media markets within a single body. The Media Council is part of the NMHH; it has a distinct competence in the media field. The two bodies have the same president. The two-thirds majority held by the governing party in Parliament has control over both the NMHH and the Media Council. The Media Council's politically biased decision-making practices are well known. Among its other tasks, the Media Council investigates complaints regarding unbalanced reporting of public service media. This is indeed an important issue in Hungary. Republikon Institute and ConnectEurope analysed the balance of evening television news programs of public television between February and July 2025. The research found that the screen time allocation between pro-government and opposition politicians was 73% and 27% respectively, and while pro-government politicians were never presented in a negative context, opposition politicians were mostly presented in a negative tone. In 2025, the Media Council received a total of 59 complaints regarding the unbalanced reporting in public service media. In each case, the Media Council either did not initiate an administrative process or terminated it.

Based on EMFA, which entered into force on 8 August 2025, Member States have a legislative obligation affecting several areas. On the other hand, it imposes several tasks on national regulatory authorities and organisations and, in some instances, on different public administration bodies. Hungary and the national regulatory authorities and bodies have not fulfilled any of their obligations under EMFA at the time of the present contribution, and based on the available information, no preparatory work is currently underway.

Act CIV of 2023 on Certain Rules for Internet Broadcasting Services appointed the President of the NMHH as the Digital Services Coordinator in Hungary. This institution was established by the Digital Services Act to carry out the tasks of the Member States in supervising intermediary service providers, including online platforms and search services, and enforcing the European regulation. The independent Lakmusz-HDMO consortium (Hungarian member of the EDMO – European Digital Media Observatory) has experienced that the President of the NMHH is not cooperative. The Lakmusz-HDMO consortium organised workshops to discuss with the NMHH and co-regulators, among other things, the current problems of disinformation and the implementation of the European Union Code of Conduct on Disinformation. The first workshop in 2024 was particularly forward-looking, with the NMHH and the members of the Lakmusz-HDMO consortium having similar views. However, during the organisation of the second workshop, András Koltay, President of the NMHH, replied that “We have come to the decision that the NMHH can no longer participate in the workshops”. In 2025 three workshops were organized, but the NMHH did not attend these events. In this way, the Digital Service Coordinator is explicitly obstructing the implementation of the EU project for which he is responsible.

In 2025, the NMHH's budget was HUF 59.5 billion (€ 149.6 million). The Parliament approves the Media Council's budget as part of the NMHH's integrated budget. The Media Council's operating budget in 2025 was

HUF 736 million (€ 1.85 million). These amounts are theoretically suitable to guarantee high-level professional work, however, in the case of the NMHH and the Media Council these serve as the price of the loyalty.

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

5000 character(s) maximum

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

5000 character(s) maximum

The situation has remained almost unchanged since our previous contributions to the Rule of Law Reports. Act CLXXXV of 2010 on Media Services and on the Mass Media (hereafter: Media Law) created a co-regulation system as an alternative to the Media Council's control. The Media Law authorised media market players to set up co-regulatory bodies which have the authority – with exclusive jurisdiction – to implement rules relating to media content. The Media Law provides that the Media Council may conclude administrative agreements with the co-regulation bodies. Based on these agreements, the co-regulation body handles a specified range of cases within the official authority's jurisdiction and performs other functions relating to media administration and media policy. In this framework the responsibility of co-regulatory bodies is to decide upon complaints concerning the activities of service providers, to arbitrate disputes between media enterprises and to monitor the activities of providers.

Four organisations have sprung up as part of the co-regulation framework since 2011: the Hungarian Newspaper Publishers' Association, the Association of Hungarian Content Providers, the Association of Hungarian Electronic Broadcasters and the Advertising Self-Regulatory Board.

The co-regulation system never really took off, however, and it was obvious that no one felt confident that it would be worthwhile to resort to this forum for settling disputed issues. The co-regulation procedure is not independent of the authorities since – based on the underlying legal agreement – the Media Council provides the co-regulatory bodies with financial support. Nor is it independent of the market, since the market players delegate members to serve on these bodies. Furthermore, the market players can also keep track of who lodged complaints against them. Hence, it was in no one's interest to launch such proceedings. The market players feel that it is better to keep the peace and avoid a scenario where they would have to delve into each other's disputes, and also that it would not be a good idea to alert the Media Council to problems. Civic organisations and citizens also do not report issues, either because they do not know the system or because they do not want to legitimise a regulatory practice in which the Media Council plays a role.

In assessing the effectiveness of the co-regulatory system, it is very telling that relevant pages on the websites of two industry organisations are blank or visibly incomplete. There is no indication that any kind of proceedings have been conducted in the case of the Association of Hungarian Content Providers and the Association of Hungarian Electronic Broadcasters. The Hungarian Newspaper Publishers' Association and the Advertising Self-Regulatory Board publish monitoring documents about certain issues.

The co-regulation system is a clear example of how an otherwise good, rule-of-law-compliant system in Hungary has become so empty that it is failing to fulfil its original purpose.

Self-regulatory bodies are weak and have limited role in the Hungarian media. The Association of Hungarian Journalists (MÚOSZ) is a journalists' organisation with long traditions, but the average age of members is quite high, and the organisation is not a very significant player in the Hungarian media field. A relatively new organisation (Médiaforum) was created as an association of independent media, but its visibility is also limited. Independent local media outlets created their community (Fülke) to amplify the voices of local communities.

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

The issues raised in the previous Rule of Law Reports still prevail.

It is well documented that state advertisers favour pro-government companies and avoid independent media. This practice renders fair competition impossible and distorts the market. State sources finance politically favoured media outlets, and this helps several pro-government media enterprises to flourish, or at least survive the economically difficult years. These media companies are unquestionably loyal to the Government: the editorial practice has to serve the interest of the ruling parties if they want to preserve their most important revenue source. At the same time independent media outlets have become extremely vulnerable because of the unfair competition. The market-distortion effect of state advertising spending still prevails, therefore the publisher of Magyar Hang weekly with another Hungarian publisher filed a state aid complaint to the European Commission in April 2025.

The communication public procurement system is totally centralized. State institutions should conduct their communication activities, including state advertising, through the National Communications Office (NKOH). This means that public institutions, e.g. ministries, state-owned companies, and public institutions can only contract with media agencies that have previously won a public procurement tender and have concluded a framework agreement with the NKOH. Since 2018 the NKOH has had a framework agreement only with the New Land Media and Lounge Design media agency consortium. These two agencies have the same owner, Gyula Balásy, a pro-government businessman. The obligated contracting authorities (public institutions) can enter into a contract with this one consortium, which can either be concluded after consultation or simply ordering the service. The contracting authority is obliged to base its award on the prices of a single tenderer. In fact, given the complexity of communication tasks, the pricing of individual tasks depends on the price that a single bidder quotes for a specific task.

So instead of encouraging the competition among the framework agreement partners, NKOH obliged all public institutions to contract with the Balásy-consortium. The consortium has a monopoly in state communication, and it has a price-setting role.

In the years 2022–2025 NKOH spent HUF 225 billion (€ 566 million) based on the framework agreement. The original value of the framework agreement was HUF 75 billion (€ 189 million), but it was extended twice for the same amount. Following a new public procurement tender, NKOH concluded a new framework agreement in October 2025 again worth HUF 75 billion. There is also an option for two extensions, so the actual value of the agreement is HUF 225 billion, as well as in the previous period.

NKOH is part of the Prime Minister's Cabinet Office and Antal Rogán, the head of the Cabinet Office is responsible for the NKOH. At the very beginning of 2025, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned Antal Rogán for his involvement in corruption in Hungary, based on the Global Magnitsky Human Rights Accountability Act. The announcement underlines that he controls NKOH and "(t)hroughout his tenure as a government official, Rogan has orchestrated Hungary's system for distributing public contracts and resources to cronies loyal to himself and the Fidesz political party". In April 2025 the U.S. State Department removed sanctions on Antal Rogán.

Since the EMFA came into force in August 2025, the transparency of state advertising should be ensured. However, no changes have been made in this area, and the Hungarian government has not taken any steps towards implementing the EMFA. Mertek Media Monitor sent a freedom of information request to the NKOH, asking about compliance with EMFA regulations in relation to state advertising. The NKOH did not provide a substantive response, stating that "due to its role as a central purchasing body, the NKOH does not participate in specific communication tasks, such as the implementation of advertising campaigns".

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 issues raised in the previous Rule of Law Reports still prevail.

Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content protects the independence of journalists in the following way: journalists are entitled to professional independence from the owner of the media content provider and from the person supporting the media content provider or placing a commercial announcement in the media content, as well as to protection against pressure from the owner or the person supporting the media content to influence the media content (editorial and journalistic freedom). A journalist cannot be penalised under employment law or any other legal penalty for refusing to comply with an order that would curtail their editorial and journalistic freedom. In practice, however, this rule has no practical significance and no journalist has ever taken legal action on this ground.

As also pointed out by previous Rule of Law Reports, there are serious governance and transparency problems around the public service media. The Hungarian public media operate in the framework of a very complex and confusing institutional structure. The Media Service Support and Asset Management Fund (hereafter: Fund) performs practically all of the public media's content acquisition and show production and it is also the legal employer of the public service media employees. At the same time, however, the editorial responsibility for the content lies with another organisation, the Duna Médiaszolgáltató Nonprofit Zrt. (hereafter: Duna).

According to the Media Law, Duna is the public service media provider and it is more or less appropriately subject to external control mechanisms (Board of the Public Service Public Foundation, Public Service Body, Public Service Fiscal Council), but in reality, the oversight is merely a façade since it has no resources. And then there is the Fund, which disposes of taxpayer funds without being subject to any meaningful independent control. The Fund is subject to the review of a single organisation: the Media Council. The budget of Duna for 2025 was HUF 2.44 billion (€ 6.1 million), while the budget of the Fund was HUF 165 billion (€ 415 million).

This is obviously a hacking of public service media transparency requirements.

Article 5(2) of EMFA requires that the heads of the public service media provider be chosen through a transparent, open, efficient, and non-discriminatory process. The Hungarian Parliament must amend media law and detailed rules are necessary to ensure this process for selecting managers of public service media providers. EMFA has not been implemented, the required legislative changes have not been done. Mertek Media Monitor submitted a freedom of information request to the Ministry of Justice about legislative measures to implement Article 5(2) of EMFA. The Ministry responded in January 2026, and actually published an anti-EU political statement as a response. The Ministry stated that, in its opinion, certain provisions of the EMFA violate

Hungary's sovereignty and therefore it has turned to the CJEU.

The radio frequency tenders of Media Council showed a more balanced practice in 2024, although the Media Council continued to support the expansion of Fidesz-affiliated radio stations. Based on the analysis of the Media Council's decisions, there were 35 radio frequency tenders in 2024; five of them were inconclusive. Out of the remaining 30 tenders, 16 frequencies were allocated to radio network operators close to the Government: 14 radio stations are part of networks owned by pro-government investors (Radio1, Radio7), two radios are owned by a church, and 14 frequencies were allocated to other operators. The 2025 analysis is not available yet.

[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 transparency of ownership is not the major problem in the Hungarian media system, but the transparency should be improved. The owners can be checked in the company registry, but no media-specific database is available.

In some cases, the beneficial owner is unknown. The best-known example of this is TV2, the market-leading commercial television broadcaster and one of the country's largest media companies. Investigative journalists have been trying to identify the beneficial owner for years, but this has not been possible due to the complex corporate structure. The increasingly widespread system of private equity funds and trust asset managers is conducive to concealing the beneficiary owner.

According to Article 22 of the EMFA Member States must establish substantive and procedural rules to evaluate concentrations in the media market that significantly affect media pluralism and editorial independence. In 2025 the Hungarian legislator had not yet established either the rules on notification or the criteria for notified mergers. This provision became especially relevant in October 2025, when a significant pro-government media company Indamedia Network acquired Ringier Hungary. Among other media brands the market leader tabloid newspaper Blikk and its online portal were involved in the acquisition.

Article 6 of the EMFA mainly imposes responsibilities on media service providers to ensure that users know the ownership backgrounds of their service providers and to identify and evaluate potential conflicts of interest.

Article 6(2) of EMFA trusts national regulatory authorities or other competent authorities with the development of national media ownership databases containing the relevant information of media ownership. In 2025 the Hungarian government did not implement EMFA and the ownership database was not created.

Ownership concentration is another major problem in Hungary.

Besides the Central European Press and Media Foundation (Közép-Európai Sajtó és Média Alapítvány, KESMA), several commercial media companies are owned by pro-government investors, like TV2 commercial television, Radio1 network, Index news portal and Blikk tabloid newspaper. The ruling party controls other elements of the media ecosystem, e.g. the media agency market, sales houses, printing facilities, distribution systems, and so on.

There are no real ownership constraints in the Hungarian media legislation, it is allowed to build a big media empire. The Media Law provides that the Hungarian Competition Authority (HCA) is obliged to obtain the position statement of the Media Council for the approval of the concentration of enterprises if the enterprises or the affiliates of two groups of companies bear editorial responsibility and their primary objective is to distribute media content to the general public via an electronic communications network or a printed media product. The official position statement of the Media Council shall bind the HCA. The Media Council shall not have the right to reject granting an official licence when the level of merger between independent opinion sources after the merger will ensure the right for diversity of information within the particular market segment for the media content service.

Until now the Media Council has issued reasoned opinions in only three of the seven cases, of which it granted regulatory clearance for the merger in one case. The most important feature of the technical content of the opinions is that they are unsubstantiated and inconsistent.

The Government has a possibility to avoid the investigation of the Media Council and the HCA. When KESMA

was transformed into a media empire in 2018, the Prime Minister signed an order declaring the transactions to be a matter of “national strategic importance in the public interest”. This is a tool to avoid the investigation of authorities.

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

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

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

5000 character(s) maximum

The discontinuation of political advertising on Google and Meta in fall 2025 severely affected government communications, even before the EU's Transparency and Targeting of Political Advertising (TTPA) regulation came into effect. These ads were previously an important tool for disseminating government messages, which

often included disinformation and hostile narratives.

During the first nine months of 2025, before Google and Meta banned political ads, government-affiliated actors, including government agencies, Fidesz politicians, government-organized media, and proxy organisations, paid for 87% of the HUF 4.1 billion (approximately € 10.6 million) spent on Google and Meta ads in Hungary. The remaining 13% was shared by all other actors, including all opposition parties, NGOs, and independent media.

Despite bans by Google and Meta, political ads – including seemingly harmless cartoons and hardcore deepfakes placed by pro-government advertisers – have continued to run on both tech giants' platforms, though in significantly smaller quantities. Often, the ads are simply reclassified in other categories, such as Business, Finance, Autos, or Internet.

As in previous years, Hungary was unique among the countries of the European Union in 2025 in that government-controlled media outlets and their social media pages were the primary sources of fake news and conspiracy theories. The main targets of these disinformation campaigns were European Commission President Ursula von der Leyen, Ukrainian President Volodimir Zelensky, EPP President Manfred Weber, and Péter Magyar, president of the TISZA party and Viktor Orbán's challenger in the upcoming elections. According to disinformation spread by the Government, "war-mongering Brussels" intends to interfere in the 2026 Hungarian elections to install a "puppet government" that supports Ukraine through Magyar and his party. In contrast, the governing party's main campaign message is that Prime Minister Viktor Orbán is the guarantor of peace and the only one who can protect the country from war. The Government used AI-generated content to support these claims. By the end of 2025, the entire Hungarian county newspaper network and the daily newspaper Magyar Nemzet, both of which are controlled by the governing party, were coordinating the distribution of AI-generated fake images of Magyar to link him to the war and "Brussels warmongers". Moreover, the governing party spread false information about the TISZA party's alleged plans to increase taxes with enormous resources, based on an AI-generated document. Meanwhile, a court of first instance ruled that the pro-government media outlet Index, which originally published the documents, had falsely claimed they were linked to the opposition party. In another case, a court issued an interim order prohibiting the distribution of a free special edition of the pro-government tabloid Bors, which aimed to widely disseminate the false information. However, the governing party interpreted the court's ban on disseminating blatant lies as a restriction on freedom of speech.

IV. Other institutional issues related to checks and balances

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

5000 character(s) maximum

A. The process for preparing, enacting and implementing laws

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

** This includes also the consultation of social partners*

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

Regime for constitutional review of laws

5000 character(s) maximum

B. Independent authorities

Independence, resources, capacity and powers (including effective access to relevant data) of national human rights institutions ('NHRIs'), of ombudsman

institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

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

5000 character(s) maximum

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

5000 character(s) maximum

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

C. Accessibility and judicial review of administrative decisions

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

D. The enabling framework for civil society

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

E. Initiatives to foster a rule of law culture

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

5000 character(s) maximum

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

5000 character(s) maximum

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

If there are any significant challenges concerning the Single Market you have been facing in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, that you would like to highlight, please do so here.

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

5000 character(s) maximum

Supporting document upload

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

Contact

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