

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

Ökotárs-Hungarian Environmental Partnership Foundation

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

www.okotars.hu

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

685660618446-49

* 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

Veronika

Surname

Móra

Email Address of the organisation

info@okotars.hu

* 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

A. Media authorities and bodies

(Cf. Article 30 of Directive 2018/1808)

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

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

5000 character(s) maximum

Safeguards against state / political interference, in particular:

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

5000 character(s) maximum

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

5000 character(s) maximum

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

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

5000 character(s) maximum

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

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

In the 2025 Rule of Law Report it was recommended to Hungary to “[e]nsure that there are no obstacles hindering the work of civil society organisations, including by repealing legislation that hampers their capacity of working, and foster a safe and enabling civic space”.

However, as detailed below under Questions IV.16–18. and IV.20., no steps have been taken to comply with this recommendation, and instead of progress, the environment for civil society organisations (CSOs) and human rights defenders has further deteriorated, marked by increasing political pressure, stigmatisation, and legal uncertainty.

Administrative burdens, delayed registrations, and a law transferring the CSO registry from the courts to a yet unspecified authority raise concerns. Several restrictive laws remain in force, including those enabling audits without adequate justification or safeguards, broad “investigations” and public stigmatisations by the Sovereignty Protection Office, a criminal provision deterring the provision of legal assistance to asylum-seekers, and a punitive tax on migration-related funding. In 2025, the situation escalated with the proposed Bill on the Transparency of Public Life, which would allow blacklisting, funding bans and ultimately the dissolution of CSOs and media outlets without effective remedies, causing widespread concerns despite its postponed adoption (see Question IV.16. for details). Government rhetoric increasingly vilified CSOs and independent actors, which was amplified by pro-government media and reports by the Sovereignty Protection Office, with the smear campaigns contributing to a chilling effect in civil society. Activists and professionals faced criminal procedures, workplace retaliation, and dismissals for speaking out or showing solidarity, fostering self-censorship. Access to funding is increasingly constrained by political narratives targeting foreign support, opaque state grant systems favouring pro-government groups, and the chilling effect of threatening legislative steps, undermining CSOs’ sustainability and effectiveness.

A constitutional amendment and related statutory changes led to the banning of both the Budapest Pride and the Pécs Pride.

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

The transparency and quality of the legislative process and the efficiency of public consultations remain a serious source of concern due to regulatory shortcomings, the circumvention of rules, and a deeply flawed practice.

Regulatory flaws include that the range of exceptions when draft laws do not have to or must not be subject to public consultation remains wide, and the non-compliance or only formal compliance with the rules have no real

consequences.

It still occurs that significant laws are not published for public consultation, which happened in 2025 e.g. in the case of the law yet again authorising the Government to extend the state of danger and override Acts of Parliament.

In other instances, in an attempt to circumvent the public consultation obligation, the Government introduces laws to the Parliament that are clearly part of government policy via governing majority MPs or parliamentary committees. Examples from 2025 include the 15th Amendment to the Fundamental Law, undermining the rights of LGBTQI+ persons and freedom of assembly and allowing for the “suspension” of Hungarian citizenship, which was proposed by governing party MPs, along with a related statutory amendment that banned LGBTQI-themed demonstrations. These laws followed months of hostile governmental rhetoric. In its related opinion, the Venice Commission raised once again that “the amendments [...] were adopted without ensuring an inclusive public debate and in the absence of a genuine consultation of all the relevant stakeholders”, and added that “[f]rom the perspective of democratic standards for the legislative process, the legitimacy of the adopted constitutional amendments may be doubted”. The Bill on the Transparency of Public Life (see Question IV. 16.) and an amendment removing campaign spending limits were also proposed by governing party MPs. Another avenue used is the Legislative Committee of the Parliament, a super committee the composition of which reflects that of the Parliament and which can introduce amendments to any bill directly prior to the plenary vote. Ministries almost never provide a longer consultation period than the statutory minimum of eight days, irrespective of the length and complexity of the draft law. The titles and summaries of the published legislative packages rarely indicate clearly the subject matter of the proposals, and laws are recurrently published for consultation with extremely short reasoning. The overwhelming majority of opinions submitted are rejected by the Government without any real reasoning. It also occurs that laws are submitted/adopted while the consultation period is still open: in 2025, this happened e.g. in relation to a law on public interest asset management foundations and a government decree on adoption.

According to the oversight report of the Government Control Office (GCO), legislative targets were formally achieved in 2024, i.e. at least 90% of all government decrees, ministerial decrees and governmental bills were subject to public consultation. However, documents acquired from the GCO by the Hungarian Helsinki Committee through litigation show that the reporting by the ministries to the GCO and the assessment by the GCO are both more formal “checking the box” exercises rather than a meaningful assessment of the practice. The templates for ministries and the filled-in templates submitted by them to the GCO regarding 2023 show that the ministries provide the legal basis for not putting a draft law to public consultation only by pointing to one of the two exemption categories in the law, i.e. it does not have to or must not be published for consultation, but do not pinpoint the exact basis within those categories enumerated by the law (e.g. “state subsidies” or “national security”, etc.), and do not provide any related explanation either. There were instances in 2023 when the ministries cited causes for omitting public consultation which are not statutory grounds, such as urgency, or, in the case of a law curtailing the powers of the Hungarian Medical Chamber, “the Government’s decision”. Similarly, the tables in which the GCO assesses compliance basically only foresee a “yes/no” level of assessment.

The quality of the impact assessments of the draft laws and the summaries published about them in the course of the public consultation is often inadequate. The new methodology for impact assessments, due by the end of 2023 under the RRP, has not yet been adopted.

Rules allowing for public hearings by local governments and administrative authorities without the public’s actual presence, held through electronic means (emails, etc.), remain in place.

In November 2025, the Meeting of the Parties to the Aarhus Convention issued a caution to Hungary (to become effective on 1 January 2028), because the Government has failed to ensure transparency and the meaningful engagement of the public in the licensing of the planned Paks II nuclear power plant.

[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

Freedom of association is guaranteed by the Fundamental Law, with the statutory framework providing for a variety of forms of associations. In addition to registered forms, such as associations and foundations, the law also acknowledges a simple, non-registered form, the “civil group”. The registry of CSOs is publicly available on the courts’ website.

In theory, the registration of CSOs is fairly straightforward, free of charge and can be done fully online using templates provided on the court’s website. In 2025 there were no reports of denied registrations or forced dissolutions, and the number of registered CSOs remained stable. However, in practice, laymen can easily make formal errors in the forms, which leads to a lengthy correction process. By law, the court has 30 days to register CSOs, but in practice the process may take several months, and the same applies to making any changes. There is hardly any official support or guidance available, only civil society resource centres, such as NIOK Foundation or PILnet offer such help. Under these circumstances, many groups decide to remain informal in order to avoid the administrative burdens of registering.

In June, the Parliament adopted Act LIX of 2025, transferring the process and the registry of CSOs from the courts to a yet undetermined authority, supposedly with the objective of decreasing the courts’ burden, giving rise to fears of political interventions. The law will enter into force on 1 January 2027, thus, its impact remains to be seen.

CSOs, especially those with public benefit status (≈20% of all CSOs) have to meet extensive documentation and reporting obligations, and they may be subject to controls by various governmental agencies. CSOs must submit their annual financial reports, using a form provided by the courts, for publication in the registry and must publish them on their own websites, guaranteeing their transparency.

The everyday operation of CSOs is largely undeterred: they can elect their statutory bodies, etc. freely. In 2025 there were no reports of excessive inspections by authorities, with one exception. The government has for years targeted the Oltalom Charitable Association, and in 2024, a government office closed down its schools teaching homeless and disadvantaged children in a decision which was revoked by the court in March 2025. In

September 2025 the same office initiated a procedure to withdraw the licence of homeless shelters managed by Oltalom, claiming inadequate conditions despite many earlier inspections.

Restrictive laws remain in force, such as

Act XLIX of 2021 on the Transparency of Organisations Carrying out Activities Capable of Influencing Public Life, subjecting certain CSOs to audits by the State Audit Office without adequate justification or safeguards; Act LXXXVIII of 2023 on the Protection of National Sovereignty, currently before the CJEU, which established the Sovereignty Protection Office (SPO), vested with excessive investigative powers over individuals and legal entities on vaguely defined grounds;

a Criminal Code provision that deters the provision of legal assistance to asylum-seekers; and

the 25% immigration tax on donors if they provide funds for activities “facilitating” immigration or on grantees performing such activities in case the donor organisation fails to pay the tax.

In 2025, restrictive legislative steps escalated further: in May, a governing majority MP submitted to the Parliament the Bill on the Transparency of Public Life, which would allow the Government to blacklist CSOs, independent media, and even for-profit companies deemed “sovereignty risks”; block or hinder to the extent of practical impossibility their funding from outside of Hungary while imposing administrative limitations on receiving domestic funding as well; monitor bank accounts, impose fines; and suspend or dissolve targeted entities. The SPO would be tasked to propose which entities would be blacklisted, without appropriate legal remedies. The bill, which violates international standards and EU law, generated protest both in Hungary and abroad, e.g. by Council of Europe and OSCE stakeholders. The bill’s adoption was postponed in June 2025, but it remains pending.

In September 2025, an emergency government decree established a “national anti-terrorism list”, foreseeing financial sanctions for those on it. Act CXXV of 2025 elevated the concept to a statutory level as of 2026. The Government put “Antifa” (sic) and Hammerbande/Antifa Ost on the list.

As of 2024, the union check-off system for public administration workers was abolished, ending the requirement for employers to deduct membership fees from salaries free of charge. This weakens unions by increasing administrative costs and causing a loss of both fees and members. In June 2025, the ILO noted these restrictions in law and practice with concern.

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

CSOs that criticise government policies and/or represent vulnerable groups have not enjoyed a safe space for more than a decade. They are the targets of smear campaigns and vilification, orchestrated by governmental figures and the pro-government propaganda machinery.

The first months of 2025 were characterized by increasingly inflammatory rhetoric by the Prime Minister. In an interview in January, he stated that “the most important foreign policy goal for 2025 is to push the Soros Empire out of Europe”, and that “[t]he time has come to [...] dismantle the foreign networks that threaten Hungarian sovereignty, and to send them home”. In his State of the Nation address, delivered in February, he “advised” Pride organizers that “they should not bother preparing for this year’s parade”. In his speech on 15 March, on the anniversary of the revolution in 1848, he likened various independent actors to stinkbugs: “After today’s festive gathering will come house cleaning for Easter. The bugs have survived winter. We are dismantling the

financial machine that has used corrupt dollars to buy politicians, judges, journalists, bogus civil society organisations and political activists. We will disperse the entire shadow army. They are [...] the minions of Brussels, paid to do the empire's bidding against their own country. [...] If there is justice, [...] there is a special place in Hell for them." These statements foreshadowed restrictive legislative steps (see Questions IV.16. and IV.20.).

Misleading or false claims by governmental figures are repeated and magnified in the pro-government media, and the stigmatisation continues to be exacerbated by the SPO's reports, marking CSOs and persons as "threats to national sovereignty". This is not limited to the most vocal CSOs: e.g., the SPO's report on the Citizens, Equality, Rights and Values (CERV) programme listed 33 CSOs, selected in a haphazard manner, including some working on child protection or in social care. The investigative portal Átlátszó, the subject of one of the first SPO reports, sued the SPO for its statements and won the case in the first instance in 2025.

Critical CSOs, especially in the countryside, can hardly access community spaces.

SLAPP cases occur, though not often. An example from 2025 concerned the Hungarian Civil Liberties Union (HCLU), which represented Forbes magazine in a case brought by the owners of a company because of their inclusion in Forbes' "richest 50" list. The owners sued HCLU for reporting that Forbes won the case.

Unlike in previous years, in 2025 there were no reported cases of surveillance, nor that of applying anti-terrorist or money-laundering rules against CSOs. However, criminal law has been used to threaten activists or persons speaking out. For example, a criminal procedure for slander was launched against a former leader of a child protection institution who publicly spoke about the childcare system's state in relation to allegations of abuse, and the police searched the house and confiscated electronics of an activist who revealed similar suspected abuses in another children's home. An activist in Pécs was cautioned by the court for damage to property for overwriting billboards carrying the Government's propaganda messages, and members of The City is for All group were condemned in the second instance for damage to property for painting slogans on sidewalks. The main organiser of the Pécs Pride is facing criminal charges for organising the assembly (see Question IV.20.). State and municipal employees are recurrently threatened or suffer workplace sanctions for speaking out. In 2024–2025, three ministry staff members were dismissed or demoted for supporting a fourth colleague who was dismissed for speaking out publicly against power abuse in heritage protection. The Péter Pázmány Catholic University launched disciplinary procedures against three researchers and dismissed a fourth in 2025 for writing supportively of LGBTQI+ persons.

Under these circumstances self-censorship is widespread, especially in the countryside where the loss of public sector employment comprises an existential threat. Restrictive laws, ill-founded measures and stigmatisation result in a chilling effect, undermine CSOs' effectiveness, and have a detrimental psychological impact on staff. Research published in 2025 showed that some CSOs have given up on applying for certain foreign funds to avoid potential attacks, and some even renounced previously awarded foreign funding; partnership building became more challenging; and some had given up on certain activities and limited their communication critical of the Government.

Physical attacks are rare. In 2025 one such case was reported from Debrecen: two men verbally insulted staff and guests of the community café operated by a CSO, which led to a physical altercation. The police apprehended the perpetrators and launched a criminal procedure against them.

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

Under the current laws, CSOs are, in theory, free to seek and receive funding both domestically and from abroad, from any sources and through any means, including online. In practice, CSOs use a broad variety of fundraising tools, ranging from online crowdsourcing and merchandising through corporate support to philanthropic and public grants. The rules for collecting individual donations prescribe that CSOs report

separately on the money collected but does not otherwise burden them excessively.

However, foreign funding has for years been treated by the Government and the governing party as suspicious, and CSOs receiving grants from abroad are among the primary targets of smear campaigns. This continued in 2025 as well. For example, in February, the Prime Minister said at a governing party gathering that the “political corruption network” of George Soros and the Democrats will no longer pay their “mercenaries” with “rolling dollars” in Hungary, and asked the MPs to pass strict laws and “ban” those from Hungary who benefited from these funds. In his State of the Nation address, he called for “shutting off the Soros network’s financial sluice gates, let the state bodies do their duty in protecting sovereignty”, and referred to this as “spring cleaning for Easter”. This was followed by his speech likening independent actors to stinkbugs (see Question IV.17.). The Prime Minister welcomed the steps of President Trump suspending and then terminating foreign aid programs, and the Government appointed a special commissioner to “uncover political corruption funds paid by the United States Agency for International Development to Hungarian entities”.

The Prime Minister’s statements came after an almost full year of operation of the SPO, with its “investigations” and “reports” repeatedly framing EU activities, EU funding and engagement with the EU’s rule of law toolbox as threats to the sovereignty of Hungary. After publishing reports on a number of CSOs, in 2025 the SPO’ publications focused (among others) on EU funding programs such as CERV, Horizon Europe and the Asylum and Migration Integration Fund, listing some of their Hungarian beneficiaries in a hand-picked manner.

In a related move, a Hungarian member of the Patriots group in the European Parliament requested the EC in March 2025 to disclose the list of supported CSOs in the period 2019–2024 and the amount these CSOs received, claiming that the EC funding of CSOs is “carried out in a non-transparent way”.

In May 2025, these steps escalated in the tabling of the Bill on the Transparency of Public Life (see Question IV.16.). This caused some donors postponing or cancelling support; grant processes have been suspended; at some CSOs, board members and other representatives have stepped down; and the mental burden on the staff has been considerable.

There are several state instruments, e.g. the National Cooperation Fund and the City and Village Civil Funds, that support CSOs with significant amounts: the former with 16 billion HUF, while the latter with 4.8 billion HUF each in 2025. However, the working procedures of these funding mechanisms are not transparent, e.g. the lists of supported projects are hard to find on the website and are not well searchable. As journalists have repeatedly shown by analysing the grant call results, the majority of this funding goes to organisations established and/or led by local leaders and figures of the governing party. While human rights and critical CSOs are not excluded per se, they have not received any grants for years from these sources. EU Structural Fund support is mainly distributed through pre-defined projects, and not open, competitive calls, strongly favouring state institutions and churches over CSOs. Meagre municipal grants cannot make up for missing funding, and local institutional philanthropy remains weak. Therefore, independent CSOs depend on foreign institutional and private donors as well as on micro-donations, which they collect with increasing efficiency. The negative impacts of the sudden termination of US governmental funding programmes in early 2025 were felt by several Hungarian organisations as well.

All CSOs can register to benefit from the 1% of personal income tax based on citizens’ assignation. In 2025, more than 30,000 CSOs were included in this scheme. While organisations caring for children and stray animals have traditionally been the main beneficiaries, human rights CSOs also receive significant amounts and most recently the foundations of independent media outlets are becoming popular, too, with news portal Telex and YouTube-channel Partizán topping the list of 2025. Besides this there are very little tax benefits: companies supporting CSOs with public benefit status can deduct 20% of the donation from their corporate tax (40% if the support exceeds three years), but individual taxpayers have no similar scheme. Corporate tax benefits are strongly biased towards professional sports.

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

Relating to LGBTQI+ people's rights, overall, no progress has been made and the situation has instead further deteriorated. Legislation and discriminatory practices in Hungary continue to create a hostile environment for LGBTQI+ individuals; Hungary's 2021 Propaganda Law still poses multiple legal challenges within the context of the rule of law.

On 11 March 2025, MPs belonging to the governing majority of the Hungarian Parliament submitted the 15th Amendment to the Fundamental Law, which was adopted without public consultation and took effect on 15 April 2025.

The first paragraph of Article L) of the Fundamental Law was amended to include „[h]uman beings shall be male or female” aiming to strengthen the legal basis for prohibiting legal gender recognition in Hungary, violating Article 7 of the Charter of Fundamental Rights of the European Union, which acknowledges gender identity as an essential aspect of personal identity and guarantees the right to respect for private life. Based on this amendment, the Parliament removed “gender identity” from the list of protected grounds in the Equal Treatment Act.

Another amendment of the Fundamental Law aimed to create a fixed hierarchy of rights, placing the right of the child to protection and care above all other rights, with the exception of the right to life. Consequently, in case of a conflict between the right of the child to protection and care and other rights, such as the right to freedom of peaceful assembly, restrictions are applied without the balancing exercise, leading to the deprivation of other rights of their substance.

Based on this amendment of the Fundamental Law, the Parliament introduced a new ground to prohibit assemblies as it introduced an Article 13/A to Act LV of 2018 on the Freedom of Assembly (hereafter: Assembly Act), prohibiting holding “an assembly that is in violation of a prohibition specified in Article 6/A of Act XXXI of 1997” – referring back to that provision of Act XXXI of 1997 on the Protection of Children and Guardianship Administration that was introduced by the 2021 Propaganda Law. To attend such a prohibited assembly is a petty offence (misdemeanour) and punishable with a fine of up to HUF 200,000 (ca. EUR 500). The new restrictions on the right to freedom of peaceful assembly are a significant regression in the protection of LGBTQI+ rights and the rule of law in Hungary.

In several cases concerning assemblies supporting LGBTQI+ rights, the Kúria applied the rule of the precedence of the right of the child to the protection and care over the right to freedom of peaceful assembly. Throughout the spring and summer of 2025, the police banned all assemblies related to LGBTQI+ issues, with one exception, and the prohibitions were ultimately upheld by the Kúria.

The Budapest Pride event, organised by the Municipality of Budapest, took place on 28 June 2025. Despite the fact that as a municipal event, it fell outside the scope of the Assembly Act, on 19 June 2025, the police issued a decision banning Budapest Pride. After the event had taken place, the police launched an investigation and identified the Mayor of Budapest as a suspect and questioned him in August. (Based on Article 217/C of Act C of 2012 on the Criminal Code, any person who organises a banned assembly, or who calls for participation in

such an assembly, faces imprisonment for up to one year.) On 12 December 2025, the police proposed that the prosecutor should press charges against the Mayor over his role in organising the Budapest Pride.

The organiser of Pécs Pride, a private individual, notified the police about the planned march and on 5 September 2025, the police issued their decision banning the assembly based on Article 13/A of the Assembly Act. The ban was again upheld by the Kúria. The organiser proceeded with the march on 4 October 2025. On 28 October 2025, the police summoned the organiser for interrogation as a criminal suspect for “organising a prohibited assembly”, and on 6 November, media reports indicated that the police recommended to the prosecutor to press charges. These cases expose a dangerous shift: in 2025 legal developments turned the exercise of human rights protected in the Charter into potential criminal acts.

The 15th Amendment to the Fundamental Law also allows for the arbitrary “suspension” of Hungarian citizenship. The detailed rules for this were established by Act LXIV of 2025, with the Venice Commission being of the opinion that the statutory framework should be modified to comply with standards. The 15th Amendment also introduced the notion of “the right to local identity” into the Fundamental Law. This created the basis for an exclusionary “local identity law”, leading municipalities to adopt decrees indirectly discriminating against the Roma community in housing, in violation also of EU law.

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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