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ABSTRACT

The level of perceived judicial independence in Denmark continues to be very high among both the general public and companies. Human and financial resources allocated to the justice system continue to increase progressively in line with the 2024-2027 multi-year financial agreement. The review of the legal aid system is still pending, with the Judicial Council expected to complete it by summer 2026. The inquiry committee appointed to report on the organisation, structure and tasks of the courts continues its work, with a view to submitting its report by the beginning of 2027. The level of digitalisation of the justice system remains overall good, and the multi-year IT project for processing criminal and probate cases continues to advance. While the average case handling time has decreased overall, challenges remain for certain categories of cases.

The perception among experts, citizens and business executives is that Denmark is one of the least corrupt countries in the world. The authorities are preparing a strategy to improve the prevention and prosecution of foreign bribery which is expected to be adopted in 2027. The new four-year budget framework for the Danish Police provides new resources and prioritises the fight against economic crime. There are no plans to introduce rules on ‘revolving doors’ for ministers and on lobbying, and to ensure the adequate control of asset declarations submitted by persons entrusted with top executive functions. New rules have been adopted to ban donations from abroad to political parties, while a broader reform of the rules on private funding of political parties has not yet been completed. The authorities consider that the implementation of the rules on whistleblowing is accomplished and there are no further actions planned in this regard. While there is no overarching process in place to identify sectors with a high risk of corruption, the authorities continue to implement measures concerning foreign bribery.

The mandate and responsibilities of the media regulatory authorities have expanded. The establishment of a new Media Ombudsman was agreed following the recommendations of the Media Liability Committee. Recent reforms introduce a new competence-based model for appointing Denmark's Radio's board, alongside the adoption of a new corporate strategy through 2030. Denmark has taken steps to modernise its media policy framework ahead of the negotiations of the new multi-year media agreement. Work on proposals for a revised Access to Public Administration Files Act is still ongoing. The safety of journalists remains high in Denmark.

The legislative process remains inclusive overall. The Danish Institute for Human Rights continues to carry out its mandate independently and highlights the importance of providing adequate resources to effectively fulfil its tasks. A new funding model for civil society has been agreed at the political level in 2025.

RECOMMENDATIONS

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference, the Commission concludes the following:

- Limited progress has been made on the recommendation to finalise the review of the legal aid system, as the Judicial Council continues its work. It is therefore recommended to Denmark to *step up efforts to complete this review, taking into account European standards on legal aid*.
- No progress has been made to introduce rules on ‘revolving doors’ for ministers and on lobbying and ensure adequate control of asset declarations submitted by persons entrusted with top executive functions, with no plans to introduce such rules nor to improve control of asset declarations. Therefore, it is recommended to Denmark to *introduce rules on ‘revolving doors’ for ministers and on lobbying and ensure adequate control of asset declarations submitted by persons entrusted with top executive functions*.
- Some further progress has been made on the recommendation to advance with the reform of the Access to Public Administrative Documents Act as the expert committee continued its work with a view to such a reform, but no legislative proposal has been presented yet. Therefore, it is recommended to Denmark to *step up efforts to move forward with the reform of the Access to Public Administrative Documents Act, taking into account European standards on access to official documents*.

I. JUSTICE SYSTEM¹

Independence

The level of perceived judicial independence in Denmark continues to be very high among both the general public and companies. Overall, 88% of the general population and 87% of companies perceived the level of independence of courts and judges to be ‘fairly or very good’ in 2026². The level of perceived judicial independence among the general public has significantly increased in comparison with 2025 (81%) and has increased in comparison with 2022 (84%). The level of perceived judicial independence among companies has increased in comparison with 2025 (82%) and has remained at the same level as in 2022 (87%).

Quality

Human and financial resources allocated to the justice system continue to increase progressively in line with the 2024-2027 multi-year financial agreement. The framework provides for a total of approximately EUR 308 million (DKK 2.3 billion) in additional funding over the period compared with 2023 levels, aimed both at maintaining current levels of judicial activity and implementing the initiatives set out in the agreement³. Under the current multi-year financial agreement, 28 of the 30 envisaged new judges have already been placed. In addition, 23 deputy judges were recruited in 2025, bringing the total number of deputy judges appointed under the current multi-year financial agreement to 40⁴. Resources under the agreement have also been allocated to expanding courtroom capacity and the court infrastructure portfolio, including investments in different courts and aligning the judicial systems of Greenland and the Faroe Islands with that of Denmark⁵. The Danish Court Administration has welcomed these additional resources, highlighting their contribution to improving courts’ efficiency⁶.

There has been limited progress on the recommendation to complete the review of the legal aid system, with the Judicial Council continuing its work in accordance with the timeline for presenting results by summer 2026⁷. In December 2024, the Ministry of Justice had requested the Judicial Council, a permanent advisory body for the Ministry of Justice regarding civil justice, to review the legal aid system in Denmark⁸. The Judicial Council has continued its work on this review, with recommendations expected to be presented by summer 2026⁹. Some stakeholders have expressed concerns regarding the pace

¹ An overview of the institutional framework for all four pillars can be found [here](#).

² Figures 48 and 50, 2026 EU Justice Scoreboard and Figures 51 and 53, 2024 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

³ 2025 Rule of Law Report, Denmark, p. 3.

⁴ Danish government (2026a), additional written input.

⁵ Country visit Denmark, Danish Court Administration.

⁶ Country visit Denmark, Danish Court Administration.

⁷ The 2025 Rule of Law Report recommended to Denmark to “step up efforts to complete the review of the legal aid system, taking into account European standards on legal aid.” Limited progress was previously assessed on this recommendation in 2025.

⁸ Country visit Denmark, Ministry of Justice.

⁹ Danish Government (2026), written input, p. 1, Country visit Denmark, Ministry of Justice.

at which the review is being conducted¹⁰. As the review is still ongoing, overall progress on the recommendation to complete the assessment of the legal aid system remains limited.

The inquiry committee appointed to report on the organisation, structure and tasks of the courts continues its work, with a view to submitting its report by the beginning of 2027¹¹. In March 2025, an inquiry committee was established to examine the structural conditions of the courts. This follows the multi-year agreement on the financing of the judiciary for the period 2024-2027. The committee is tasked with reviewing the organisation and structure of the courts, their specialisation, and the courts' buildings portfolio. Its mandate specifies that any proposed reorganisation or structural changes should ensure user focus, nation-wide accessibility, short case-handling times, uniformity, and efficient, high-quality solutions¹². The committee is expected to submit its final report, including specific recommendations, by the beginning of 2027¹³.

The level of digitalisation of the justice system remains overall good, and the multi-year IT project for processing criminal and probate cases continues to progress, with completion expected by the end of 2026. The use of digital technology by courts and prosecution services is overall good, with key developments including full digital handling of criminal cases between the police, prosecution services and courts; a new case-management system for estate proceedings was launched in selected pilot courts to allow the system to be tested and stabilized before a nationwide roll-out expected for mid-2026¹⁴. As of 1 January 2026, four system releases have been deployed, covering probate cases, fine review, compulsory liquidation, and preliminary criminal case management, with future releases to cover remaining estate probate and criminal cases¹⁵. The staggered rolling out of an IT system for processing criminal and probate cases is entering its final implementation phase, with both types of cases anticipated to fully migrate from legacy systems by the end of 2026¹⁶. The Courts of Denmark's online database of judgments ("Domsdatabasen") was expanded in 2025 to approximately 7 850 decisions¹⁷. Digitalisation efforts extend to Greenland and the Faroe Islands¹⁸, taking into account statutory and legal differences that prevent fully standardised deployment¹⁹.

Efficiency

¹⁰ Country visit Denmark, Danish Judges Association, Danish Bar and Law Society. As noted in the 2025 Rule of Law Report, a pre-legislative committee had already been set up with a mandate broadly similar to that of the Judicial Council, though there were important differences. Notably, the Judicial Council's mandate does not require it to assess possibilities for strengthening information about the Danish legal aid model, nor does it obligate the Council to incorporate recommendations from previous reports, unlike the pre-legislative committee. 2025 Rule of Law Report, Denmark, p. 4.

¹¹ 2025 Rule of Law Report, Denmark, p. 4.

¹² Country visit Denmark, Danish Judges Association.

¹³ Country visit Denmark, Danish Court Administration.

¹⁴ Figures 41, 42 and 43, 2026 EU Justice Scoreboard.

¹⁵ Danish Government (2026), written input, p. 5, Country visit Denmark, Danish Ministry of Justice.

¹⁶ Danish Government (2026), written input, pp. 4-5, Country visit Denmark, Danish Court Administration.

¹⁷ Danish Government (2026), written input, p. 5, Country visit Denmark, Danish Ministry of Justice.

¹⁸ There are ongoing efforts under the North Atlantic Programme to ensure that the Faroe Islands and Greenland gain digital access to key areas in the judiciary equivalent to what is available in Denmark. The aim of the programme is to establish equal digital support across the enforcement, civil, criminal, and probate domains, while also accommodating the linguistic, legal, and organizational conditions specific to Greenland and the Faroe Islands.

¹⁹ Country visit Denmark, Danish Court Administration.

While the average case handling time has decreased overall, challenges remain for certain categories of cases. Additional budgetary resources have been made available to the courts in support of the efforts to reduce case-handling times²⁰. The number of incoming litigious civil and commercial cases at first instance remained stable in 2024 (0.9 cases per 100 inhabitants). The estimated time needed to resolve litigious civil and commercial cases at first instance has declined (265 in 2023 compared with 250 in 2024), while the clearance rate for such cases increased significantly (93% in 2023 and 99% in 2024)²¹. According to the Danish Court Administration, the average case-handling time decreased from 2024 to 2025²². At the same time, the average case-processing time for criminal cases with lay judges at district court level ("*Domsmandssager*") slightly increased between 2024 and 2025²³. Stakeholders have linked the increase in the average processing time of criminal cases at district court level to a rise in the average length of pre-trial detention, which increased from approximately three months in 2018 to six months in 2024²⁴. In response, the Administration of Justice Act was amended in 2026 with the introduction of new initiatives to promote the use of non-custodial alternatives to detention and to reduce the duration of pre-trial detention²⁵.

II. ANTI-CORRUPTION FRAMEWORK

The perception among experts, citizens and business executives is that the level of corruption in the public sector remains low. In the 2025 Corruption Perceptions Index by Transparency International, Denmark scores 89/100 and ranks 1st in the European Union and 1st globally²⁶. This perception is relatively stable over the past five years²⁷. The 2026 Special Eurobarometer on Corruption shows that 25% of respondents consider corruption widespread in their country (EU average 71%) and 4% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 18% of companies consider that corruption is widespread (EU average 65%) and 7% consider that corruption is a problem when doing business (EU average 37%). Furthermore, 30% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU

²⁰ As part of the 2024-2027 multi-year financial agreement, approximately DKK 700 million has been allocated over the agreement period to reduce case processing times in the courts, Danish government (2026a), additional written input.

²¹ Figures 2, 5 and 10, 2026 EU Justice Scoreboard.

²² While increased resources and procedural changes initially led to a temporary rise in average case-processing times in the short term, recent data suggests a more positive trend. According to the Danish Court Administration, the case processing time decreased from 11.5 months at the end of 2024 to 9.5 months at the end of the third quarter of 2025.

²³ Country visit Denmark, Danish Court Administration.

²⁴ Justitia (2026), written input, p. 11, Danish Bar and Law Society (2026), written input, pp. 13-14.

²⁵ The act contains 4 initiatives with the aim to promote the use of non-custodial alternatives to detention and to reduce the duration of pre-trial detention: (1) increased use of electronic monitoring as an alternative less invasive measure; (2) the introduction of a new time limit of four weeks as a starting point from the Prosecution Service's bringing of charges before the court to the commencement of the trial, when the suspect is held on remand; (3) shorter maximum time limits for continuous periods of pre-trial detention before stricter requirements for continued detention apply; and (4) easier access to court hearings on the preservation of evidence which may have a bearing on the lifting of pre-trial detention, Danish government (2026a), additional written input.

²⁶ The level of perceived corruption is categorised as follows: low (above 79); relatively low (between 79-60), relatively high (between 59-50), high (below 50).

²⁷ In 2021, the score was 88, while in 2025, the score is 89. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points) and is relatively stable (changes from 1-3 points) in the last five years.

average 38%), while 45% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 31%)²⁸.

The authorities are preparing a strategy to improve the prevention and prosecution of foreign bribery which is expected to be adopted in 2027. The strategy is part of an action plan²⁹ aiming to address the OECD's recommendations³⁰. The strategy will inter alia focus on sanctions for money-laundering and false accounting offences, the confiscation of bribes, and small facilitation payments³¹. The authorities continue to consider that a strategy going beyond foreign bribery or a specialised agency dealing with anti-corruption issues unnecessary as, in their view, no additional strategy and agency are needed given the trust-based political culture³². Within the government, coordination of anti-corruption matters continues to be carried out on a case-by-case basis by the Ministry of Justice. The anti-corruption forum created in 2014 has not met over the past three years³³. Civil society and academia continue to challenge the lack of a strategic framework³⁴. According to GRECO, the Danish anti-corruption system puts a strong focus on criminal conduct while not paying enough attention to integrity risks³⁵.

The new four-year budget framework for the Danish Police provides new resources for the fight against economic crime, potentially benefiting the fight against corruption. Additional funds of over EUR 130 million (DKK 1 billion) are envisaged to support the recruitment of more investigators and prosecutors in the broader area of economic crime for the years 2026 to 2030, which might also contribute positively to the fight against corruption³⁶. The National Special Crime Unit (SCU) and the State Prosecutor for the Special Crime Unit (SPSCU), which were put in place under the previous budget framework (2021-2025), are expected to continue their work under the new framework focusing on complex or

²⁸ Data from Special Eurobarometer 573 (2026) and Flash Eurobarometer 582 (2026).

²⁹ A follow-up implementation plan to the action plan that was submitted in November 2025 has been submitted to the OECD in June 2026. A revised action plan is expected to be submitted later this year, Danish government (2026a), additional written input.

³⁰ A first OECD report has been published in 2023. In the follow-up report, published in 2025, the Working Group concludes that Denmark has fully implemented 6 recommendations, partially implemented 12 recommendations, and not implemented 37 recommendations. Significant gaps and weaknesses concern, in particular, small facilitation payments, whistleblower protection, sanctions for false accounting offences and money laundering, as well as the overall detection, investigation and prosecution of foreign bribery. OECD (2025), p. 4.

³¹ Country visit Denmark, Ministry of Justice.

³² Country visit Denmark, Ministry of Justice.

³³ Country visit Denmark, Ministry of Justice.

³⁴ Country visit Denmark, Transparency International Denmark and Magtudredningen 2.0. Under the relevant OECD public integrity indicators, Denmark scores below the EU average on the coverage of strategic framework (1 out of 7).

³⁵ GRECO concludes that Denmark has dealt in a satisfactory manner with only two of the fourteen recommendations contained in the Fifth Round Evaluation Report. In that context, GRECO also notes that the recommendation to develop a strategy for the integrity of persons with top executive functions remains not implemented. GRECO (2025), pp. 2-3.

³⁶ None of these funds have however been specifically earmarked for the fight against corruption. Country visit Denmark, Ministry of Justice, and National Special Crime Unit.

cross-border cases³⁷. The overall number of investigations and judgments for corruption cases remains at a similar level as in 2024³⁸.

There has been no progress on the recommendation to introduce rules on ‘revolving doors’ for ministers, on lobbying and on the adequate control of asset declarations submitted by persons entrusted with top executive functions³⁹. Concerns of stakeholders⁴⁰ remain regarding corruption risks relating to the lack of rules on integrity for ministers and top executive functions⁴¹, as well as on lobbying and revolving doors, while there are no plans to introduce rules in these areas⁴². While the authorities do not plan to introduce rules on lobbying, associations representing the public affairs sector plan to establish a voluntary lobbying register for all entities engaging in interest representation (including the private sector, CSOs, and trade unions)⁴³. As a result, there has been no progress on this recommendation.

New rules have been adopted to ban donations from abroad to political parties, while a broader reform of the rules on private funding of political parties has not yet been completed. A revision of the law on private financing of political parties bans donations from abroad to Danish political parties and candidates⁴⁴. Stakeholders indicate that the overall level of transparency of private donations to political parties remains low given the high threshold below which donations may be made anonymously, the use of indirect donations, the absence of a centralised overview of donations received by each party, and the lack of sanctions for breaching the rules⁴⁵. Negotiations on a broader reform to address these issues started in 2023 but were not completed in the previous legislative term⁴⁶.

The authorities consider that the implementation of the rules on whistleblowing is accomplished and there are no further actions planned in this regard. The authorities report that the rules on whistleblowing have been implemented well⁴⁷. In 2025, 282

³⁷ Country visit Denmark, Ministry of Justice and National Special Crime Unit.

³⁸ In 2025, the police registered 92 reports of bribery in the public sector and 1 in the private sector, compared to 68 and 0 respectively in 2024. There were 69 judgments on bribery-related charges in 2025 compared to 129 in 2024. State of play for January 2026. Danish Government (2026), written input, pp. 10-11.

³⁹ The 2025 Rule of Law Report recommended to Denmark to ‘introduce rules on “revolving doors” for ministers and on lobbying and ensure adequate control of asset declarations submitted by persons entrusted with top executive functions’. No progress was previously assessed on this recommendation in 2025 and 2024, 2023.

⁴⁰ Country visit Denmark, Nyt Europa, and Transparency International Denmark. Binderkrantz, Anne Skorkjær, Pedersen, Lene Holm, and Michael Bang Petersen (2025), pp. 61-63. In the addendum to the second compliance report, GRECO concludes that “Denmark has thus far dealt in a satisfactory manner with only two of the fourteen recommendations contained in the Fifth Evaluation Report” and that no progress has been made on any of the recommendations. GRECO (2025), p. 10.

⁴¹ Integrity rules are also lacking for Parliament, as there is no code of conduct in place and no system to register external activities and financial interest of Members of Parliament. GRECO noted that 12 years after the adoption of the Fourth Round Evaluation Report, none of the recommendations addressed to members of parliament have been fully met. GRECO (2026).

⁴² Danish Government (2026), written input, pp. 7-8.

⁴³ Country visit Denmark, Magtudregningen 2.0, Transparency International Denmark, Danish Industry.

⁴⁴ A few exemptions exist, notably for EU grants and donations from EU political parties, Members of the European Parliament and the Member of the European Commission nominated by Denmark. The revised law entered into force in July 2025. Law No 721 of 20/06/2025.

⁴⁵ 2025, Rule of Law Report, Denmark, p. 7. Nyt Europa (2026), written input, p.18. Country visit Denmark, Transparency International Denmark.

⁴⁶ Country visit Denmark, Ministry of Interior.

⁴⁷ Country visit Denmark, Ministry of Justice.

whistleblowing reports were received by the general external reporting channel established within the Danish Data Protection Agency⁴⁸. 273 reports were processed by the authorities out of which 89 were forwarded to other public authorities for investigation, including 3 to the police. According to a study published by Transparency International Denmark, the number of whistleblowing reports submitted via internal reporting channels continues to rise⁴⁹. At the same time, the number of reports that have been rejected, mostly because they were deemed out of scope, remains high (64%)⁵⁰.

While there is no overarching process in place to identify sectors with a high risk of corruption, the authorities continue to implement measures concerning foreign bribery.

Businesses' attitudes towards corruption in the EU show that 22% of companies in Denmark (EU average 30%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years⁵¹. 44% of companies perceive the level of independence of the public procurement review body (the Complaints Board for Public Procurement) as very or fairly good⁵². The Single Market and Competitiveness Scoreboard on access to public procurement in Denmark reports 23% of single bids for 2025 (27% EU average). Overall, the authorities do not consider corruption a major risk⁵³. At the same time, they highlight an increased exposure to corruption risks in the defence sector due to larger financial flows and increased speed in procurement procedures⁵⁴. Besides existing rules on conflicts of interest and gifts, actions to mitigate these risks focus on awareness-raising activities among staff⁵⁵. A strategy on foreign bribery and a national risk assessment on money laundering – which may also address corruption risks – are also being prepared. Stakeholders also highlight corruption risks in the pharmaceutical sector⁵⁶.

III. MEDIA PLURALISM AND MEDIA FREEDOM

The mandate and responsibilities of the media regulatory authorities were expanded.

The Danish Radio and Television Board was designated as the national regulatory authority for the European Media Freedom Act (EMFA), resulting in an expansion of its mandate and supervisory responsibilities⁵⁷. Following amendments to the Radio and Television Act⁵⁸, the

⁴⁸ The number of reports received in 2025 was 51% higher compared to 2024. Country visit Denmark, Ministry of Justice.

⁴⁹ Transparency International Denmark (2026), written input, p. 4.

⁵⁰ Ibidem. Civil society noted that further awareness raising campaigns or trainings could help to improve the understanding of the whistleblowing framework. Currently, the authorities do not plan such activities as the number of whistleblowing reports received continues to increase. The authorities also refer to existing guidance documents and a telephone hotline. Country visit Denmark, Ministry of Justice and Transparency International Denmark.

⁵¹ Flash Eurobarometer 582 on Businesses' attitudes towards corruption in the EU (2026). This is 8 percentage points below the EU average.

⁵² Figure 59, 2026 EU Justice Scoreboard.

⁵³ Country visit Denmark, Ministry of Justice.

⁵⁴ This assessment is shared by stakeholders. Country visit Denmark, Danish Industry and Transparency International Denmark. Børsen (2025). Berlingske (2025).

⁵⁵ Ministry of Defence Acquisition and Logistics Organisation (2026), written contribution. The authorities highlight that all public employees, irrespective of their area of work, are required to follow the Code of conduct in the public sector. Country visit Denmark, Ministry of Justice.

⁵⁶ Country visit Denmark, Danish Industry and Transparency International Denmark.

⁵⁷ Act No 741 of 20 June 2025 amending the Radio and Television Broadcasting Act and the Media Support Act (establishment of supervision and supplementary provisions for compliance with Regulation (EU) 2022/2065 (Digital Services Act), Regulation (EU) on transparency and targeting of political advertising and Regulation (EU) 2024/1083 (European Media Freedom Act)).

Board has been granted the necessary financial, human and technical resources to carry out its tasks under both instruments. In this context, the composition of the Board has also been updated, and it now consists of 12 members⁵⁹. The Danish Press Council similarly reported that its resources were strengthened last year and considers these resources currently adequate to manage its workload. This assessment comes despite an increasing number and complexity of complaints, as the higher level of activity has also generated additional pressure on procedures and processing times. Many concern allegations that impact individuals or companies. These complaints fall within the Press Council's mandate to assess compliance with press ethics standards and often concern, for example, whether media outlets have sufficiently verified facts and substantiated allegations prior to publication, particularly in cases affecting individuals or companies⁶⁰.

The establishment of a new Media Ombudsman was agreed following the recommendations of the Media Liability Committee. In December 2025, the Danish Government, and two parliamentary parties agreed on follow-up actions on the Media Liability Committee recommendations, including the establishment of a new independent institution for handling complaints and assessing compliance with publishing ethics among non-traditional media actors (such as influencers, bloggers and podcasters), not covered by existing press self-regulation mechanisms. The Media Ombudsman will also be able to conduct criminal proceedings and intervene in civil cases against non-traditional media actors. In terms of division of competences, traditional media will remain under the Press Council's authority for matters of journalistic and press ethics, though the Media Ombudsman will be able to refer cases related to mass media to the Press Council for them to handle⁶¹. A draft bill was published for public consultation in early 2026. General elections took place in Spring, which led to the reform being put on hold. According to the new Government's platform, it intends to proceed with the implementation of the agreement⁶². Some stakeholders highlighted the importance of ensuring that the forthcoming Media Ombudsman preserves the existing self-regulatory system, which is considered to function well, and does not introduce different editorial standards or parallel regulatory approaches for different types of media actors⁶³.

Recent reforms introduce a new competence-based model for appointing the board of Danmarks Radio (DR), alongside the adoption of a new corporate strategy through 2030. The 2026 Media Pluralism Monitor (MPM) finds a low risk for the independence of the public service media in Denmark, which are primarily constituted by DR and TV 2⁶⁴. In July 2025, amendments to the Radio and Television Broadcasting Act introduced a new competence-based model for appointing members to DR's board, expected to enter into force in 2027. DR has also adopted a new corporate strategy for the period until 2030⁶⁵. DR considers the existing legal framework to provide sufficient safeguards for editorial

⁵⁸ With a view to alignment with the EMFA which entered into force on 8 August 2025, Denmark adopted national implementing measures, including amendments to the Radio and Television Act (in force from 1 July 2025) and an executive order of 8 August 2025 laying down supplementary rules on the role of the national media regulator, media ownership transparency, market concentration and state advertising.

⁵⁹ Danish Government (2026), written input, p. 12.

⁶⁰ Country visit Denmark, Danish Press Council.

⁶¹ Danish Government (2026), written input, pp. 12-13.

⁶² Government of Denmark (2026), *Det politiske grundlag for firkloverregeringen*, June 2026, p. 57.

⁶³ Country visit Denmark, DR and Danske Medier; NYT (2026), written input, p. 22; European Federation of Journalists (2026), written input, pp. 16-17.

⁶⁴ 2026 Media Pluralism Monitor, country report for Denmark, p. 32.

⁶⁵ Different together' with DR's strategic benchmarks towards 2030.

independence⁶⁶. In December 2025 the Danish Committee on the Evaluation of the TV 2 Regions published a report concerning the future organisation of regional public service broadcasters. The follow-up to these recommendations is expected to be part of the negotiations on the next multi-year media agreement⁶⁷. The agreement will be a key element of the decision-making process, setting the overall scope and strategic direction of Danish media policy, including public service media, media support schemes and market regulation⁶⁸.

Denmark has taken steps to modernise its media policy framework ahead of the negotiations of the new multi-year media agreement. In October 2025, the Danish Committee on Future Media Support presented recommendations for a new media support model, including the consolidation of existing schemes into a single editorial production support scheme for news media⁶⁹. Stakeholders expressed strong support for the proposals, describing them as a well-considered basis for a more coherent and future-proof funding framework⁷⁰. Some stakeholders further indicated that media ownership structures in Denmark remain relatively transparent, while noting a trend towards increased market concentration in recent years, reflected in a decline in independent Danish-owned media groups following acquisitions involving foreign media groups⁷¹. This tendency is also highlighted by the MPM 2026, which reports a very high risk to market plurality⁷².

There has been some further progress on the recommendation to advance with the reform of the Access to Public Administrative Documents Act, with work on proposals for a revised Act still ongoing⁷³. Access to official documents remains governed by the Access to Public Administration Files Act, and a revision of the framework is currently under preparation. An expert committee established in February 2024 is working on proposals for a revised Act⁷⁴. According to the new Government's policy programme, the Government will consider whether the forthcoming recommendations from the expert committee working on proposals for a revised Access to Public Administration Files Act should lead to legislative proposals⁷⁵. Some stakeholders indicated that, in practice, access to documents continues to be affected by broad use of exceptions and delays in processing requests and noted that no concrete outcomes have yet emerged from the ongoing review process⁷⁶. Given that the work

⁶⁶ Country visit Denmark, DR.

⁶⁷ Danish Government (2026), written input, pp. 13-14.

⁶⁸ Country visit Denmark, Ministry of Culture.

⁶⁹ Danish Government (2026), written input, p. 13: “[...] *The Committee has proposed eight criteria that, in combination, defines whether an individual news media title qualifies for support, including criteria on editorial identity and responsibility, independence and editorial resources, among others. Furthermore, the Committee has proposed a modernized innovation support scheme that is more flexible, risk-tolerant and efficient. The scheme applies the same eligibility criteria for individual news media titles as those set out in the new basic media support model [...].*”

⁷⁰ Country visit Denmark, Danske Medier.

⁷¹ Country visit Denmark, Press Council.

⁷² 2026 Media Pluralism Monitor, country report for Denmark, p. 21.

⁷³ The 2025 Rule of Law Report recommended to Denmark to: ‘continue to advance with the process to reform the Access to Public Administrative Documents Act in order to strengthen the right to access documents, in particular by limiting the grounds for rejection of disclosure requests, taking into account the European standards on access to official documents. Some further progress was previously assessed on this recommendation in 2025.’.

⁷⁴ Country visit Denmark, Ministry of Justice.

⁷⁵ Government of Denmark, *Det politiske grundlag for firkloverregeringen* (The Political Programme of the Four-Party Government), June 2026, p. 58.

⁷⁶ Country visit Denmark, Danske Medier and Press Council.

of the expert committee is ongoing, there has been some further progress on last year's recommendation.

The safety of journalists remains high in Denmark. Journalists in Denmark generally operate in a safe environment and are able to work freely without significant interference. A national action plan for journalists' safety⁷⁷ aims to strengthen protection through measures such as monitoring incidents, facilitating dialogue among stakeholders and promoting international cooperation⁷⁸. Monitoring of threats and harassment is primarily carried out by journalists' organisations, which collect reports from journalists and media outlets. Stakeholders reported a perceived increase in threats and hostile reactions towards journalists, although no major or systemic incidents were identified and the overall situation was described as stable⁷⁹. In 2025, there were concrete instances of threats and harassment against journalists in Denmark, including online threats against a journalist and vandalism targeting media premises in Copenhagen. These incidents are documented in the Mapping Media Freedom database, and, in the case of the online threats, by the Council of Europe's Platform to promote the protection of journalism and safety of journalists. The Danish Union of Journalists has continued to encourage reporting, indicating that such risks remain present and are being systematically addressed⁸⁰. In addition to the two abovementioned incidents, four new alerts have been registered in the Media Freedom Rapid Response. Two of the alerts concern discredit of the press, one concerns withdrawing financial support for a local newspaper, and the last one addresses the Government's plan to introduce a Media Ombudsman⁸¹.

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCE

The legislative process remains inclusive overall. Fast-track legislative procedures have been used for 4% of the adopted bills during the parliamentary year 2025-2026 so far⁸². As regards public consultations, stakeholders generally found consultations to be inclusive and carried out within adequate deadlines, although in certain cases the consultation periods were perceived as too short⁸³. Since the last report, 175 public consultations have taken place, of which 24 were shorter than the recommended four-week consultation period⁸⁴. Some stakeholders furthermore believe that limited integration of feedback on public consultations may reduce the scope for meaningful participation in the legislative process⁸⁵.

The Danish Institute for Human Rights continues to carry out its mandate independently and highlights the importance of providing adequate resources to effectively fulfil the tasks assigned to it. Following its re-accreditation with 'A' status by the Global Alliance of National Human Rights Institutions (GANHRI) and its Sub-Committee on Accreditation in October 2024 and the recommendations issued in that context, the Institute has begun with follow-up actions. On 1 December 2025, the Institute issued a consultation response to a draft law amending its founding Act in the context of the

⁷⁷ Denmark has adopted a national action plan to enhance the safety of journalists, in line with UN and Council of Europe recommendations. The plan establishes a coordinated mechanism involving authorities and media stakeholders, focusing on monitoring threats, supporting victims, strengthening institutional cooperation, and promoting international exchange. The Danish action plan for the safety of journalists was agreed in 2021 and has been implemented since January 2022.

⁷⁸ Danish Government (2026), written input, pp. 16-18.

⁷⁹ Country visit Denmark, Press Council.

⁸⁰ Council of Europe, Platform to promote the protection of journalism and safety of journalists; European Centre for Press and Media Freedom, Mapping Media Freedom. The Government responded to both alerts.

⁸¹ European Centre for Press and Media Freedom, Mapping Media Freedom.

implementation of the EU Directive on equality bodies⁸⁶. In its response, the Institute also noted that a number of GANHRI's re-accreditation recommendations require amendments to the institute's founding act which were eventually not taken up by the Government⁸⁷. The Institute also stressed the need for sufficient resources to effectively discharge its expanded functions. It considers that its responsibilities – including those relating to Greenland⁸⁸, as well as its enhanced role as a national equality body covering religion or belief, age, and disability – have increased without a commensurate rise in funding⁸⁹. The Institute reported no structural challenges to its independence.

More than two thirds of companies surveyed in Denmark express confidence in the effectiveness of investment protection. 78% of companies are very or fairly confident that investments are protected by law and courts, a figure which has slightly increased in comparison with 2025 (76%)⁹⁰. As regards authorities relevant for economic operators, 73% of companies perceive the level of independence of the national competition authority (Danish Competition and Consumer Authority) as very or fairly good, a figure which has significantly increased in comparison with 2025 (60%)⁹¹. The Supreme Court has jurisdiction in several business-related cases, including in cases related to public procurement, public concessions, public contracts and economic regulation. A number of judicial mechanisms to improve efficiency are available in these cases, including the possibility to apply interim measures, joint examination of similar cases and the consolidation of multiple appeals⁹².

⁸² In a fast-track procedure, the period between submission to Parliament and the final reading would be less than 40 days. The percentage of bills which have been adopted with fast-track procedure in the parliamentary year 2025-2026 were based on data from 5 January 2026, Danish Government (2026), written input, p. 19. Country visit Denmark, Secretariat of the Standing Orders Committee of the Parliament.

⁸³ Country visit Denmark, Danish National Human Rights Institution, Justitia. Under the relevant OECD Indicators of Regulatory Policy and Governance (iREG), while Denmark systematically engages stakeholders in the later stages of rulemaking, it scores below the EU average on stakeholder engagement.

⁸⁴ The numbers regarding public consultations were retrieved on 9 February 2026. Danish Government (2026a), additional written input.

⁸⁵ Country visit Denmark, Justitia, OECD Indicators of Regulatory Policy and Governance (iREG).

⁸⁶ The proposed amendments extend the Institute's role as a national equality body to cover sexual orientation, religion, belief, age and disability.

⁸⁷ These legislative changes, which finally were not taken up in the final draft law, included explicitly providing in the Act for its ability to recommend the ratification of international conventions, safeguarding immunity for its staff, and strengthening provisions reflecting its full mandate. Country visit Denmark, Danish Institute for Human Rights.

⁸⁸ The Danish Institute for Human Rights was appointed as the NHRI in Greenland in 2014 and has become increasingly more resourceful to fulfil the mandate in Greenland, nonetheless no permanent funding for this work has been allocated. ENNHRI, 2026 Denmark country report.

⁸⁹ Denmark provides financial support to both the national and international work of the Institute. DIHR's national work is financed by the Appropriation Act of 2026 with an allocation of DKK 43.8 million in 2026. Further, DIHR receives an annual grant to support its international work (DKK 50.0 million are planned for 2026). In addition, DIHR receives a number of grants and funding for its international activities from the European Commission and several bilateral donors inside and outside of the EU.

⁹⁰ Figures 52 and 53, 2026 EU Justice Scoreboard. Only 9% and 8% of the surveyed investors respectively perceive the frequent changes in legislation or concerns about the quality of the law-making process and concerns about quality, efficiency or independence of justice as a reason for the lack of confidence in investment protection.

⁹¹ Figure 60, 2026 EU Justice Scoreboard.

⁹² Figures 66 and 67, 2026 EU Justice Scoreboard. The data presented reflects exclusively the mechanisms in place at the level of the highest administrative jurisdictions; the same or other mechanisms may be in place at lower instance administrative courts.

On 1 January 2026, Denmark had 5 leading judgments of the European Court of Human Rights pending implementation, an increase of 2 as compared with the previous year⁹³. At that time, Denmark's rate of leading judgments from the past 10 years that had been implemented was at 50% (compared to 57% in 2025; 50% remained pending), and the average time that the judgments had been pending implementation was 1 year and 10 months (compared to two years and three months in 2025)⁹⁴. The oldest leading judgment has been pending implementation for more than five years⁹⁵. As regards the respect of payment deadlines, on 31 December 2025 there was no case awaiting confirmation of payments (the same as in 2024)⁹⁶. On 17 June 2026, the number of leading judgments pending implementation remained at five⁹⁷. The Government has appointed an Ambassador for Conventions tasked with reviewing and clarifying Denmark's obligations under the European Convention on Human Rights (ECHR)⁹⁸. The Government-appointed working group tasked with examining Denmark's obligations under the European Convention on Human Rights had not yet completed its work when parliamentary elections were held in Denmark on 24 March 2026⁹⁹. The continuation of the study depends on whether the newly appointed Government decides to reappoint the working group¹⁰⁰.

A new funding model for civil society has been agreed at the political level in 2025. Civic space in Denmark continues to be rated as 'open' by Civicus¹⁰¹. In October 2025, the Danish Government, together with a broad cross-party majority in Parliament, agreed on a new model for state funding of civil society organisations operating in the fields of social affairs, health, employment, equality, immigration and integration¹⁰². The new model aims to enhance the transparency, predictability and stability of public funding for civil society. As part of the reform, a new board composed of civil society representatives will be established to act as the granting authority. The implementation process has begun, including the development of grant criteria, governance arrangements and operational modalities. The new model is expected to become fully operational in 2028¹⁰³. Civil society organisations are included in the ongoing preparatory work to ensure that their expertise and experience inform the design of the final grant criteria. Some stakeholders have raised concerns regarding the selectivity and conditionality of the new funding model, noting that its impact will depend on the operational rollout¹⁰⁴. Stakeholders also pointed out that for organisations not covered by the new model, funding arrangements would benefit from more predictability and neutrality¹⁰⁵.

⁹³ For an explanation of the supervision process, see the [website](#) of the Council of Europe.

⁹⁴ All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2026. EIN (2026), written input, p. 3.

⁹⁵ Judgment of the ECtHR, 45439/18, Aggerholm v. Denmark, pending implementation since 2020.

⁹⁶ Council of Europe (2026), p. 162.

⁹⁷ Data according to the online database of the Council of Europe (HUDOC).

⁹⁸ Danish Ministry of Foreign Affairs (2025).

⁹⁹ 2025 Rule of Law Report, Denmark, p.12.

¹⁰⁰ Danish Government (2026a), additional written input. Stakeholders have expressed concerns about the potential impact on these measures on the implementation of ECHR judgments and case law in practice, Justitia, Nyt Europa (2026), written input. Country visit Denmark, Danish National Human Rights Institution.

¹⁰¹ Denmark's score is 89/100. Ratings by Civicus are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed.

¹⁰² Danish Government (2026), written input pp. 26-27, Country visit Denmark, Ministry of Justice.

¹⁰³ Danish Government (2026), written input p. 27, Country visit Denmark, Ministry of Justice.

¹⁰⁴ Country visit Denmark, Nyt Europa, Globalt Fokus.

¹⁰⁵ Country visit Denmark, Globalt Fokus, Nyt Europe (2026), written input, p. 6.

Annex I: List of sources in alphabetical order*

* The list of contributions received in the context of the consultation for the 2026 Rule of Law Report can be found at https://commission.europa.eu/publications/2026-rule-law-report-targeted-stakeholder-consultation_en.

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Annex II: Country visit to Denmark

The Commission services held virtual meetings in February 2026 with:

- Danish Bar and Law Society
- Danish Media Association
- Danish Union of Journalists
- Danish Press Council
- Danish National Human Rights Institution
- Globalt Fokus
- Danish Judges Association
- Danish Court Administration
- Justitia
- Magtutredning 2.0 project
- Ministry of Business
- Ministry of Culture
- Ministry of Interior
- Ministry of Justice
- National Audit Office
- National Special Crime Unit
- Nyt EuropaParliamentary Ombudsman
- Prosecution Service, including the National Special Crime Unit and the State
- Prosecutor for Special Crime Unit
- Secretariat of the Standing Orders Committee of the Parliament
- Supreme Court
- Transparency International Denmark
- The Confederation of Danish Industry

* The Commission also met the following organisations in a number of horizontal meetings:

- Civil Liberties Union for Europe
- Civil Society Europe
- End FGM EU
- European Civic Forum
- European Partnership for Democracy
- Human Rights Watch
- ILGA-Europe
- International Federation for Human Rights
- Philea - Philanthropy Europe Association
- Transparency International EU