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**COMMISSION STAFF WORKING DOCUMENT**

**2025 Rule of Law Report  
Country Chapter on the rule of law situation in Denmark**

*Accompanying the document*

**Communication from the Commission to the European Parliament, the Council, the  
European Economic and Social Committee and the Committee of the Regions**

**2025 Rule of Law Report  
The rule of law situation in the European Union**

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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 for the justice system are being progressively increased. Procedural rules aimed at improving the efficiency of the judiciary are being implemented, while it is too early to assess their impact. An inquiry committee was appointed to report on the organisation, structure and tasks of the courts. Work on the review of the legal aid system, started in 2020, will re-commence, as the pre-legislative committee did not complete its work and a new body has been tasked to present results by 2026. The trend of increasing average case handling times continues.

Denmark is perceived as one of the least corrupt countries in the world. The anti-corruption programme adopted in the framework of the implementation of the Recovery and Resilience Plan remains applicable to EU funded projects. The system used to monitor investigations and prosecutions of corruption offences allows regular reporting. The reform of the rules on private financing of political parties is pending in Parliament. There are no plans to introduce rules on revolving doors for ministers and on lobbying, and to ensure adequate control of asset declarations submitted by persons entrusted with top executive functions, or to strengthen integrity rules in Parliament. The implementation of the rules on whistleblowing is considered to be on the right track by both the authorities and civil society. While there is no specific process to identify areas with high-risk of corruption, foreign bribery is a focus for the authorities.

The human resources of the Danish Radio and Television Board and the Danish Press Council have been strengthened. New rules were adopted to strengthen the transparency regarding the appointment of the board of directors of Danmarks Radio (DR). Current rules on media liability and the existing media support mechanisms are being reviewed in light of technological developments. The work on strengthening the right of access to information continues. The safety of journalists remains high although there are calls for more transparency in reporting incidents.

The legislative process is inclusive overall and rules have been amended to give Parliament more time for the consideration of legislative proposals. The Danish Institute for Human Rights was reaccredited with 'A' Status. Civic space in Denmark continues to be open while some stakeholders call for a more transparent and foreseeable approach to funding for civil society.

## **RECOMMENDATIONS**

Overall, concerning the recommendations in the 2024 Rule of Law Report, Denmark has made:

- Limited progress on completing the review of the legal aid system, taking into account European standards on legal aid.
- No progress on introducing 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 on advancing 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.

On this basis, and considering other developments that took place in the period of reference, it is recommended to Denmark to:

- Step up efforts to complete the review of the legal aid system, taking into account European standards on legal aid.
- 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.
- 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.

## I. JUSTICE SYSTEM<sup>1</sup>

### Independence

**The level of perceived judicial independence in Denmark continues to be very high among both the general public and companies.** Overall, 81% of the general population and 82% of companies perceived the level of independence of courts and judges to be ‘fairly or very good’ in 2025<sup>2</sup>. The level of perceived judicial independence among the general public has slightly decreased in comparison with 2024 (83%) although it has increased in comparison with 2021 (75%). The level of perceived judicial independence among companies has decreased in comparison with 2024 (88%) and has slightly decreased in comparison with 2021 (83%).

### Quality

**Human and financial resources for the justice system are being progressively increased.**

The multi-year financial agreement for 2024-2027, providing a total of some EUR 308 million (DKK 2.3 billion) additional funds over that period compared to the 2023 financing levels, is designed both to ensure the current level of activity, and to implement initiatives specified in the agreement<sup>3</sup>. Under the agreement, 12 additional district court judges and a large number of assistant judges and clerical staff have been recruited in 2024<sup>4</sup>. These efforts will continue in 2025, when a total of nine new judges will be appointed, as well as additional assistant judges and clerical staff to strengthen case processing at the courts<sup>5</sup>. Stakeholders were overall positive about the increase in resources for the judiciary but noted that it was too early to assess any impact on the case-handling times<sup>6</sup>.

**The procedural rules aimed to improve the efficiency of the judiciary are being implemented, but stakeholders agreed that it was too early to assess their impact.** On 15 June 2024, more than 100 amendments to the Administration of Justice Act, the Criminal Code and the Execution of Sentences Act entered into force. These amendments are linked to the multi-year financial agreement for the judiciary and originate from the proposals of the expert committee chaired by a former Supreme Court President and the Judicial Council in 2023<sup>7</sup>. The amendments aim to reduce case processing times, for example by a transfer of criminal cases between courts based on agreements between district court presidents. In October 2024, the court presidents of four district courts agreed to the transfer of 400 criminal cases between their courts, with the aim of reducing backlogs. While stakeholders agreed that it was too early to assess the impact of the overall reform<sup>8</sup>, they expressed some

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

<sup>2</sup> Figures 50 and 52, 2025 EU Justice Scoreboard and Figures 49 and 51, 2023 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%).

<sup>3</sup> Some 43% for ongoing work, the rest for initiatives defined in the agreement.

<sup>4</sup> Country visit Denmark, Danish Court Administration.

<sup>5</sup> Danish Court Administration (2025b), Country visit Denmark, Danish Court Administration.

<sup>6</sup> Country visit Denmark, Danish Court Administration, Judges Association, Bar Association, Justitia.

<sup>7</sup> The amendments concern a wide range of procedural aspects touching upon lay judges’ involvement in criminal cases, judgements in absentia in criminal cases, conditions for appeals in civil cases, thresholds for appeals, small claims cases and other issues. Danish Court Administration (2024a).

<sup>8</sup> Country visit Denmark, Bar Association, Judges Association, Danish Court Administration, Justitia.

concerns as regards the decision on the transfer of cases without the consent of the parties<sup>9</sup>. While parties must be given the opportunity to comment on such transfers, stakeholders deem that the lack of explicit consent could give rise to some concern for individuals tried in criminal cases<sup>10</sup>.

**An inquiry committee was appointed to report on the organisation, structure and tasks of the courts.** In March 2025, an inquiry committee was appointed to address the structural conditions of courts. This is a follow-up to the multi-year agreement on the financing of the judiciary for the period 2024-2027. The committee is tasked with examining the structure and organisation of the courts, their specialisation as well as the courts' buildings portfolio. According to the committee's mandate, any reorganisation and structural changes should take into account the need to ensure user focus, accessibility throughout the country, short case-handling times, uniformity and efficient and high-quality solutions. The committee is expected to report by the end of 2026<sup>11</sup>.

**There was limited progress on completing the review of the legal aid system, as the pre-legislative committee appointed in 2020 did not complete its work and a new body has been tasked to present results by 2026<sup>12</sup>.** In December 2024, the Ministry of Justice requested the Judicial Council, a permanent advisory body on civil justice, to review the legal aid system in Denmark. While a pre-legislative committee had already been set up for the same purpose in 2020<sup>13</sup>, according to the Government, it proved difficult for progress under the initial set-up. A similar mandate was given to the Judicial Council<sup>14</sup>. The Judicial Council is expected to present its results by summer 2026<sup>15</sup>. As the review of the legal aid system has been re-initiated, there was limited progress on the recommendation to complete the review of the legal aid system.

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<sup>9</sup> Country visit Denmark, Bar Association, Justitia.

<sup>10</sup> The applicable rules provide that if the total number of cases pending before a district court and the processing times at the district court so warrant, the court may, at the request of a party, on its own initiative and in agreement with the president of the district court concerned or the president of the High Court, refer a criminal case to another district court in the jury district or, if circumstances so warrant, to another district court in the High Court district if a decision at this court can be expected significantly faster. Before the court decides on the referral, the parties must be given the opportunity to comment on the matter. According to the Danish authorities, a transfer against the defendant's wishes should not be made if it would have significant negative effects on the defendant's defense. A decision to transfer the case can be appealed to the Supreme Court by the defendant and the Prosecution Service. Danish Government (2025), written contribution. Country visit Denmark, Danish Court Administration.

<sup>11</sup> Danish Court Administration (2025c).

<sup>12</sup> The 2024 Rule of Law Report recommended to Denmark to "complete the review of the legal aid system, taking into account European standards on legal aid."

<sup>13</sup> The Ministry of Justice had set up the pre-legislative committee in April 2020 to review the legal aid system, in response to a number of studies conducted by stakeholders highlighting certain weaknesses in the functioning of the legal aid system. Criticisms of the system raised by the Bar and Law Society and Justitia, a think tank working on judicial issues, relate in particular to the access to legal aid offices (including regional disparities), legal aid in administrative matters, funding as well as the need to clarify the legal insurance scheme. 2021 Rule of Law Report, Denmark, pp. 4-5, and 2023 Rule of Law Report, Denmark, pp. 6-7.

<sup>14</sup> Danish Government (2025), written contribution; Country visit, Justitia. Justitia considered that the mandate of the Judicial Council differs from that of the pre-legislative committee. One significant omission in the Judicial Council's mandate is the requirement to assess the possibility of strengthening information about the Danish legal aid model. Justitia also noted that the Judicial Council's mandate does not require it to incorporate recommendations from previous reports, unlike the pre-legislative committee. Danish Lawyers, the Danish Bar and Law Society, and Justitia.

<sup>15</sup> Danish Government (2025), written input, pp. 4-5.

**The level of digitalisation of the justice system is overall good and the multi-year IT project for processing criminal and probate cases should be completed in 2026.** The use of digital technology by courts and prosecution services is overall good, with some gaps remaining on electronic case allocation with automatic distribution based on objective criteria, or use of blockchain or artificial intelligence applications. Procedural rules allowing digital technology in courts in civil and commercial cases are fully in place, but some gaps still exist for administrative and criminal proceedings<sup>16</sup>. In December 2024, a new digitalisation strategy was adopted, focussing on the courts' digital agenda and priority areas for the period 2024-2027, notably shortening case-handling times<sup>17</sup>. The Danish Court Administration also continues the staggered rolling out of an IT system for processing criminal and probate cases<sup>18</sup>. Since October 2022, various solutions for handling both estate and insolvency probate cases and uncontested fine administration has been rolled out. In January 2025, a system for digitalisation of selected criminal cases was launched in six courts as a trial run. The system was subsequently implemented in all courts in June 2025. The stages of all remaining estate, probate, and criminal case administration elements will be implemented incrementally by late 2026<sup>19</sup>.

## **Efficiency**

**The trend of increasing average case handling times continues.** The number of incoming civil and commercial litigious cases at first instance continued to increase in 2023 (0.9 cases per 100 000 inhabitants compared to 0.8 in 2022). The estimated time needed to resolve litigious civil and commercial cases at first instance has remained stable (268 days in 2022 compared to 265 days in 2023), whereas the rate of resolving litigious civil and commercial cases remained stable at a low level (93% in 2022 and 2023)<sup>20</sup>. According to the Danish Court Administration, the efforts to reduce the backlog of cases at the district courts in 2024 led to an expected increase in average case processing times in the short term<sup>21</sup>. The average case processing time for criminal cases at the district courts has increased from 8.6 months in 2023 to 10.7 months in 2024. The average case processing time for ordinary civil cases with a main hearing at the district courts has increased from 22.5 months in 2023 to 22.9 months in 2024<sup>22</sup>.

## **II. ANTI-CORRUPTION FRAMEWORK**

**The perception among experts, citizens and business executives is that Denmark is one of the least corrupt countries in the world.** In the 2024 Corruption Perceptions Index by Transparency International, Denmark scores 90/100 and ranks 1<sup>st</sup> in the European Union and

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<sup>16</sup> Figures 41, 42 and 43, 2025 EU Justice Scoreboard. A new artificial intelligence solution for court hearing scheduling has been implemented in an early version at the beginning of 2025. The solution is planned to be fully implemented and comprise all criminal and civil case hearings by early 2027. Danish Government (2025a).

<sup>17</sup> Danish Court Administration (2024c).

<sup>18</sup> 2024 Rule of Law Report, Denmark, pp. 4-5.

<sup>19</sup> Danish Court Administration (2025a, 2025d).

<sup>20</sup> Figures 2, 5 and 10, 2025 EU Justice Scoreboard.

<sup>21</sup> According to the Danish Court Administration, the case processing time continues to increase while the number of pending cases decreases because the courts' case backlog contains cases that are older than the average case processing time.

<sup>22</sup> The data for criminal cases concerns proceedings with a judge and two jurors. Danish Court Administration (2024b).

1<sup>st</sup> globally<sup>23</sup>. This perception has been relatively stable over the past five years<sup>24</sup>. The 2025 Special Eurobarometer on Corruption shows that 28% of respondents consider corruption widespread in their country (EU average 69%) 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 63%) and 11% consider that corruption is a problem when doing business (EU average 35%). Furthermore, 29% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 36%), while 44% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 33%)<sup>25</sup>.

**The anti-corruption programme adopted in the framework of the implementation of the Recovery and Resilience Plan remains applicable to the relevant EU funded projects.**

The anti-corruption programme adopted in the framework of the implementation of the Recovery and Resilience Plan<sup>26</sup> remains applicable to the relevant EU funded projects. Reflections on the potential usefulness of a strategic framework in the national context have taken place, and authorities continue to consider an overarching anti-corruption strategy or a specialised agency dealing with anti-corruption issues unnecessary in the national situation<sup>27</sup>. Coordination of the 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 did not meet in the last two years. The lack of strategic framework is continues to be challenged by civil society and academia<sup>28</sup>. Overall, the Danish anti-corruption system is considered by GRECO as lacking focus on integrity-related risks<sup>29</sup>.

**The system set up for collecting data on investigations and prosecutions of corruption offences allows regular reporting.** After a first reporting in 2023, the authorities provided data from all 13 police districts for 2024 on the number of reports, charges and judgments regarding corruption offences. While the reported number of ongoing investigations into complex or cross-border cases, which are handled by the National Special Crime Unit (SCU) and the State Prosecutor for Special Crime Unit (SPSCU) at the central level continues to be

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<sup>23</sup> Transparency International (2025). The level of perceived corruption is categorised as follows: low (the perception among experts and business executives of public sector corruption scores above 79); relatively low (scores between 79-60), relatively high (scores between 59-50), high (scores below 50).

<sup>24</sup> In 2020 the score was 88, while, in 2024, the score is 90. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points); is relatively stable (changes from 1-3 points) in the last five years.

<sup>25</sup> Special Eurobarometer 561 (2025) and Flash Eurobarometer 557 (2025).

<sup>26</sup> 2024 Rule of Law Report, Denmark, pp. 9-10.

<sup>27</sup> Country visit Denmark, Ministry of Justice. See also the UN Convention Against Corruption, Articles 5, 6 and 36. International standards (such as UNODC/UNDP (2013) and UNODC (2015)) recommend the implementation of effective, coordinated anticorruption policies that promote the participation of society and reflect the principles of the rule of law, with robust anticorruption strategies identified as good practice.

<sup>28</sup> Country visit Denmark, Transparency International 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).

<sup>29</sup> GRECO (2023) recommendation i and xii. Denmark's reputation as a country with a low level of corruption may contribute to limited attention being paid to corruption. The fact that corruption is not directly addressed in the Criminal Code may also reflect limited awareness in Denmark. Danish Financial Intelligence Unit (2022), p. 78.

low in 2024<sup>30</sup>, data from the police districts allows a broader picture over investigative activity, indictments and adjudications<sup>31</sup>.

**A reform of the rules on private financing of political parties is pending in Parliament.**

The revised law on public financing of political parties, adopted in 2023, entered into force in January 2024. As regards the rules on private financing of political parties, a revision of the law has been pending in Parliament since June 2023<sup>32</sup>, which raised criticism from civil society<sup>33</sup>. Negotiations of a draft bill aim to address the issue of multiple and anonymous donations, and to introduce sanctions for breaching the rules on the political parties' framework which are considered necessary by some organisations<sup>34</sup>.

**There are no plans to introduce rules on revolving doors for ministers and on lobbying, and to ensure adequate control of asset declarations submitted by persons entrusted with top executive functions<sup>35</sup>.** Concerns related to the lack of rules on integrity for ministers and top executive functions, and on lobbying and revolving doors have not been addressed and the authorities have no plans in this area<sup>36</sup>. Civil society continues to argue for the need to regulate revolving doors, given the complexity of various interest groups and the professionalisation of lobbying, which could increase the opacity of contacts between the public and private sectors<sup>37</sup>. This lack of progress was also noted by GRECO<sup>38</sup>. The Danish authorities continue to consider that the current system works well, whilst also confirming that no specific monitoring mechanism is in place<sup>39</sup>. Recent cases of revolving doors continued to raise concerns on how appropriate ethical standards can be ensured in the absence of clear rules. Integrity rules are also lacking for Parliament, as no code of conduct is in place and no system to register external activities and financial interest of Members of Parliament is available<sup>40</sup>. There was no progress on this recommendation.

**The implementation of the rules on whistleblowing is considered to be on the right track by both the authorities and civil society.** The authorities report that the rules on

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<sup>30</sup> No corruption offence beyond foreign bribery is currently ongoing. Country visit Denmark, SCU.

<sup>31</sup> In 2024, the police registered 42 reports of bribery (including both private and public sector), compared to 156 in 2023. There were 129 judgments on bribery-related charges in 2024 compared to 13 in 2023. State of play for January 2025. Danish Government (2025), written input, pp. 14-15.

<sup>32</sup> The Minister of the Interior and Health (2023).

<sup>33</sup> Country visit Denmark, Transparency International.

<sup>34</sup> 2024 Rule of Law Report, Denmark, p. 11.

<sup>35</sup> The 2024 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'.

<sup>36</sup> Danish Government (2025), written input.

<sup>37</sup> Country visit Denmark, Magtudredningen 2.0. It is a project, launched by the Danish Government and Parliament, that examines how Denmark is governed, how entrusted power is handled, and who has influence. See <https://ps.au.dk/forskning/forskningsprojekter/magtudredningen2>.

<sup>38</sup> Those recommendations include, among others, the need for a code of conduct for persons with top executive functions, increased transparency of lobbying and rules introduced on how to deal with the employment of for persons with top executive functions following the termination of their public service, more data should be included in the financial declarations of ministers and these declarations must be subject to substantive control. GRECO (2023), recommendation i, ii, iii, v, vi, vii, viii.

<sup>39</sup> Country visit Denmark, Ministry of Justice.

<sup>40</sup> Politik (2025). Due to lack of progress regarding rules on integrity in the Parliament, GRECO noted that the level of compliance with their recommendations, put forward in 2018, remains unsatisfactory. GRECO (2024).



whistleblowing have been implemented well<sup>41</sup>. This view is shared by Transparency International Denmark in a report on evaluation of the functioning in practice of the whistleblowing framework published in 2025. According to the report, the number of reports has been on the rise since 2022 (increase of 50% from 2022 to 2023 and then of 23% from 2023 to 2024) and this trend is likely to continue. In parallel, the report concludes that up to 60% of reports are rejected mostly to being outside of the scope of the whistleblowing legislation<sup>42</sup>.

**While there is no specific process to identify areas with high-risk of corruption, foreign bribery is a focus for the authorities.** Businesses' attitudes towards corruption in the EU show that 11% of companies in Denmark (EU average 25%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years<sup>43</sup>. 44% of companies perceive the level of independence of the public procurement review body (the Complaints Board for Public Procurement) as very or fairly good<sup>44</sup>. The Single Market and Competitiveness Scoreboard on access to public procurement in Denmark reports 17% of single bids for 2023 (29% EU average). In relation to foreign bribery<sup>45</sup>, identified in 2023 by OECD as a risk area in Denmark<sup>46</sup>, the authorities are considering the relevant follow-up to the recommendations. Overall, the authorities do not consider corruption a major risk and do not have any dedicated monitoring mechanism in this regard, a view which is challenged by some stakeholders<sup>47</sup>, also as risks in some areas, such as the pharmaceutical industry, and the energy sector have attracted public attention<sup>48</sup>. Nevertheless, a general risk assessment under the money-laundering rules is expected in 2026 and may cover corruption as well<sup>49</sup>.

### **III. MEDIA PLURALISM AND MEDIA FREEDOM**

**The human resources of the Danish Radio and Television Board and the Danish Press Council have been strengthened.** The national media regulatory authority, the Danish Radio and Television Board, has received an increase in human resources to deal with new tasks deriving from the implementation of the Regulation on the transparency and targeting of political advertising and the European Media Freedom Act<sup>50</sup>. The Media Pluralism Monitor (MPM) 2025 notes that eight out of eleven members of the media authority are appointed by the Minister of Culture, although there is no evidence of government interference in the authority's decisions. The risk regarding the media authority's independence is considered to

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<sup>41</sup> Country visit Denmark, Ministry of Justice.

<sup>42</sup> Transparency International noted that awareness raising could be used to address this (2024 Whistleblowing in Denmark).

<sup>43</sup> Flash Eurobarometer 557 on Businesses' attitudes towards corruption in the EU (2025). This is 14 percentage points below the EU average.

<sup>44</sup> Figure 59, 2025 EU Justice Scoreboard.

<sup>45</sup> There are currently three ongoing investigations on foreign bribery. Country visit Denmark, SPSCU and SCU.

<sup>46</sup> OECD (2023).

<sup>47</sup> Country visit Denmark, Transparency International and Magtudredning 2.0.

<sup>48</sup> 2024 Rule of Law Report, Denmark, p. 12.

<sup>49</sup> Danish Government (2025), written input. According to the last threat risk assessment, the level of corruption, including bribery in the private and public sectors, is low in Denmark and there are no indications that the scale and proceeds would increase in the coming years. Danish Financial Intelligence Unit (2022), p. 78.

<sup>50</sup> This includes six additional employees. Country visit, Danish Radio and Television Board.

be very low<sup>51</sup>. The Press Council has also received one new employee to deal with an increasing number of complaints. In 2024, the Press Council made the highest number of decisions since its establishment, although the share of cases where it found issues with press ethics was lower than in the last couple of years<sup>52</sup>.

**New rules were adopted to strengthen the transparency regarding the appointment of the board of directors of Danmarks Radio (DR).** The public service media in Denmark – primarily *Danmarks Radio* (DR) and TV 2 Danmark - are considered to be independent<sup>53</sup>. The MPM 2025 finds a low risk for the independence of the public service media with no documented instances of direct political interference in editorial policies or leadership appointments. Together, they hold about 80% of audience share in the country<sup>54</sup>. To strengthen transparency, a new act amending the Radio and Television Broadcasting Act has been adopted. It sets out new competence-based criteria for the appointment of the board of directors of DR. The law will enter into force in 2027<sup>55</sup>.

**Current rules on media liability and the existing media support mechanisms are being reviewed in light of technological developments.** The Media Liability Committee set up in 2022 has delivered a report in January 2025 regarding possibilities to update the current framework for media liability in view of the digital media reality. The committee was composed of a number of experts and representatives from the media industry, civil society and governmental authorities. The report sets out recommendations as a basis for subsequent discussions at political level. One of the recommendations concerns setting up a publicly funded independent media Ombudsperson. The institution could have competences both regarding new media actors and traditional media, for example by proactively bringing cases to the Press Council<sup>56</sup>. Stakeholders have generally welcomed the proposal, but consider that the future media Ombudsperson should be appointed by the media sector and not be able to bring cases to court<sup>57</sup>. The recommendations of the Media Liability Committee also include a quality label scheme for responsible media and a simplified judicial procedure for defamation on social media. The Government is expected to decide on the next steps in autumn 2025. In parallel, work is ongoing to potentially reform the current media support mechanisms to be more neutral regarding its distribution<sup>58</sup>. Direct subsidies are currently available for text-based news media in print and online<sup>59</sup>. The MPM 2025 finds a very high level of market concentration of audiovisual media services. The newspaper market is more diverse<sup>60</sup>.

**Some further progress has been made on the recommendation to strengthen the right of access to information<sup>61</sup>.** The committee examining possible amendments to the Access to

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<sup>51</sup> Centre for Media Pluralism and Media Freedom (2025), pp. 15-16.

<sup>52</sup> Press Council (2025).

<sup>53</sup> Country visit Denmark, Danish Union of Journalists and Danish Media Association.

<sup>54</sup> Centre for Media Pluralism and Media Freedom (2025), pp. 20, 29; European Audiovisual Observatory (2024).

<sup>55</sup> Danish Parliament (2025); Country visit Denmark, Ministry of Culture.

<sup>56</sup> Ministry of Culture (2025); Country visit Denmark, Ministry of Culture.

<sup>57</sup> Danish Union of Journalists (2025); Country visit Denmark, Danish Union of Journalists and Danish Media Association.

<sup>58</sup> Country visit Denmark, Ministry of Culture.

<sup>59</sup> Nordicom (2022).

<sup>60</sup> Centre for Media Pluralism and Media Freedom (2025), p. 20.

<sup>61</sup> The 2024 Rule of Law Report recommended to Denmark to ‘Advance with the process to reform the Access to Public Administrative Documents Act in order to strengthen the right to access documents, in

Public Administrative Documents Act, aimed at enabling wider access to the political decision-making process, is expected to conclude its work and publish a report by autumn 2025. The Ministry of Justice set up the committee in February 2024<sup>62</sup>. After the committee's report, political negotiations will commence concerning revising the Act<sup>63</sup>. Stakeholders noted progress at committee level and the need for political willingness to proceed with relevant reforms and to limit the grounds for rejection of disclosure requests<sup>64</sup>. In 2024, complaints about access to documents under the Access to Public Administrative Documents Act mainly concerned the refusal of authorities - particularly the central administration - to grant access to documents or the length of the proceedings<sup>65</sup>. Given that the work in the committee is ongoing and its report is to be published by autumn 2025, there has been some further progress on last year's recommendation.

**The safety of journalists remains high although there are calls for more transparency in reporting incidents.** Apart from one instance of a Russian law firm threatening to sue a Danish investigative news outlet, no cases potentially classified as strategic lawsuits against public participation (SLAPPs) have been identified in Denmark since the previous Rule of Law Report. Besides this alert, the Council of Europe's Platform to promote the protection of journalism and safety of journalists registered another alert concerning a surge in deepfake advertising campaigns on Meta platforms targeting Danish journalists<sup>66</sup>. Ten alerts have been registered in the Media Freedom Rapid Response, including the above-mentioned legal warning to the Danish investigative news outlet and a few instances of threatening of journalists, among others<sup>67</sup>. Denmark is not subject to the application of the EU Anti-SLAPP Directive due to an opt-out<sup>68</sup>. The MPM 2025 notes tensions between national legislation on mistreatment of religious texts, essentially constituting blasphemy, and the right for political and artistic expression<sup>69</sup>. However, journalists generally benefit from favourable working conditions, including a comprehensive social security system<sup>70</sup>. The Danish Ministry of Foreign Affairs also supports projects to create safer media environments and to promote freedom of the press outside of Denmark<sup>71</sup>. Recommendations by a dedicated committee regarding future financial support to be given to Danish media are expected to be published in autumn 2025<sup>72</sup>. The Danish Union of Journalists encourages more transparency in reporting incidents in line with the action plan on the safety of journalists, which was adopted in 2022 and was meant to facilitate journalists' reporting of any harassment or threats<sup>73</sup>.

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particular by limiting the grounds for rejection of disclosure requests, taking into account the European standards on access to official documents.'

<sup>62</sup> 2024 Rule of Law Report, Denmark, p. 16.

<sup>63</sup> Danish Government (2025), written input, p. 18; Country visit Denmark, Ministry of Culture.

<sup>64</sup> Country visit Denmark, Danish Media Association and Danish Union of Journalists.

<sup>65</sup> Danish Parliamentary Ombudsman (2025).

<sup>66</sup> Council of Europe, Platform to promote the protection of journalism and safety of journalists. Denmark has responded to one of the two alerts.

<sup>67</sup> European Centre for Press and Media Freedom, Media Freedom Rapid Response.

<sup>68</sup> Articles 1 and 2 of Protocol No 22 on the position of Denmark.

<sup>69</sup> Centre for Media Pluralism and Media Freedom (2025), p. 12-13.

<sup>70</sup> Centre for Media Pluralism and Media Freedom (2025), p. 15.

<sup>71</sup> See International Media Support (2025).

<sup>72</sup> Country visit Denmark, Ministry of Culture.

<sup>73</sup> Country visit Denmark, Danish Union of Journalists; 2022 Rule of Law Report, Denmark, p. 14.

#### **IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES**

**The legislative process is inclusive overall and rules have been amended to give Parliament more time for consideration of legislative proposals.** In June 2024, the rules for Parliament's examination of legislative proposals were amended in order to allow Parliament a more thorough consideration<sup>74</sup>. The third and final reading shall now take place no earlier than 40 days after submission to Parliament and no earlier than two days after the second reading. There were no fast-track legislative procedures used in the parliamentary year 2024-2025<sup>75</sup>. In terms of public consultations, stakeholders considered them to be inclusive and the deadlines largely acceptable, with some stakeholders noting too short consultation periods. Since the last report, 151 public consultations have taken place and 41 of these (27%) were shorter than the recommended four weeks<sup>76</sup>.

**The Danish Institute for Human Rights was re-accredited in October 2024 with 'A' status.** It was reaccredited with 'A' status in October 2024 by the Global Alliance of National Human Rights Institutions (GANHRI) and its Sub-committee on Accreditation (SCA). In this context, the SCA made recommendations to the Institute, including on introducing guidance on conflict of interests of its Board Members and outlining in its bylaws an objective and independent procedure for their removal. The Institute is in the process of deciding on the best follow up. The SCA stressed that the Institute must be provided with sufficient resources to effectively fulfil newly assigned responsibilities<sup>77</sup>. As of 1 January 2025, the Institute is also tasked with promoting, analysing and monitoring and supporting gender balance in corporate bodies of listed companies<sup>78</sup>. In March 2025, Parliament elected a new Parliamentary Ombudsman<sup>79</sup>. The post was advertised publicly following a recommendation from the Danish Institute for Human Rights. While a vacancy and Parliament's consideration of candidates are usually not public, Parliament published a call for the vacant position this time, following the suggestion by the Institute to that effect. Both the Danish Institute for Human Rights and the Parliamentary Ombudsman consider that they have adequate resources for their operations in Denmark.

**Over two thirds of the companies surveyed in Denmark express confidence in the effectiveness of investment protection.** 76% of companies are very or fairly confident that investments are protected by law and courts<sup>80</sup>. As regards authorities relevant for economic

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<sup>74</sup> A bill must be read three times in Parliament before it can be adopted. Before the amendment, the final reading was not supposed to be earlier than 30 days after the submission. However, Parliament can allow a shorter period than 40 days by simple majority (but not shorter than 30 days). Danish Government (2025), written input, p. 19.

<sup>75</sup> Between October 2024 when the parliamentary year commenced and 28 May 2025. In a fast-track procedure, the period between submission to Parliament and the final reading would be less than 40 days. Danish Government (2025), written input, p. 20. Secretariat of the Standing Orders Committee of the Parliament, written contribution.

<sup>76</sup> Out of these 41 proposals, 25 were subject to a consultation period shorter than 21 days, and 16 proposals were subject to a consultation period shorter than 14 days. Period between 24 July 2024 and 20 March 2025. Danish Government (2025), written contribution. The Danish parliamentary period stretches from October to July the following year.

<sup>77</sup> Global Alliance of Human Rights Institutions (2024).

<sup>78</sup> ENNHRI (2025).

<sup>79</sup> Danish Parliamentary Ombudsman (2025).

<sup>80</sup> Figure 54, 2025 EU Justice Scoreboard. Only 7% and 7% of the surveyed investors respectively perceive the frequent changes in legislation or concerns about the quality of the law-making process, and the quality, efficiency or independence of justice, respectively, as a reason for the lack of confidence in investment protection.

operators, 60% of companies perceive the level of independence of the national competition authority (Danish Competition and Consumer Authority) as very or fairly good<sup>81</sup>. There are no judicial mechanisms in place at the level of the Supreme Court to ensure the implementation of administrative court judgments<sup>82</sup>.

**On 1 January 2025, Denmark had 3 leading judgments of the European Court of Human Rights pending implementation, the same number as the previous year<sup>83</sup>.** At that time, Denmark's rate of leading judgments from the past 10 years that had been implemented was at 57% (compared to 50% in 2024; 43% remained pending), and the average time that the judgments had been pending implementation was 2 years and 3 months (compared to 2 years in 2024)<sup>84</sup>. The oldest leading judgment, pending implementation for 4 years, concerns inhuman or degrading treatment<sup>85</sup>. As regards the respect of payment deadlines, on 31 December 2024 there was no case awaiting confirmation of payments (the same as in 2023)<sup>86</sup>. On 15 June 2025, the number of leading judgments pending implementation had increased to 4<sup>87</sup>. In June 2024, the Danish Administration of Justice Act was amended to allow the Director of Public Prosecutions or a convicted person to request reopening of a case dealt with in the criminal justice system in order to comply with a final judgement from the European Court of Human Rights<sup>88</sup>. From a broader perspective, in April 2025, the Government tasked two experts to report on Denmark's obligations under the European Convention on Human Rights, which will help to clarify the limits of the Member States' margin of appreciation within the scope of the Convention<sup>89</sup>.

**Civic space in Denmark continues to be open, while some stakeholders call for a more transparent and foreseeable approach to funding of civil society.** The civic space in Denmark continues to be considered as open<sup>90</sup> and the legal framework for civil society organisations is an enabling factor, even though some organisations may experience administrative burdens, for instance when dealing with banks or in their cooperation with municipalities<sup>91</sup>. The operating environment is safe overall, although some level of refraining to engage in public discussion was noted by the Danish Institute for Human Rights<sup>92</sup>. The current civil society funding scheme is based on a Financial Bill proposed by the Government to Parliament, which lists the civil society organisations annually selected for public funding

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<sup>81</sup> Figure 60, 2025 EU Justice Scoreboard.

<sup>82</sup> Figure 49, 2025 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.

<sup>83</sup> For an explanation of the supervision process, see the [website](#) of the Council of Europe.

<sup>84</sup> 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 2025. EIN (2025), written input, p. 3.

<sup>85</sup> Judgment of the ECtHR, 45439/18, *Aggerholm v. Denmark*, pending implementation since 2020.

<sup>86</sup> Council of Europe (2025), p. 156.

<sup>87</sup> Data according to the online database of the Council of Europe (HUDOC).

<sup>88</sup> ENNHRI (2025).

<sup>89</sup> Ministry of Justice (2025b).

<sup>90</sup> Rating given by CIVICUS, ratings are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed.

<sup>91</sup> See also 2024 Rule of Law Report, Denmark, p. 21.

<sup>92</sup> In June 2024, the Danish Institute for Human Rights published a report on the right to freedom of speech and self-censorship, which found that 10 % of surveyed individuals in 2024 have refrained from participating in public debate in the physical public space through demonstrations or public meetings due to fear of negative reactions. Fear of violence and threats is the reason for self-censorship for 31 % of those who have refrained from participating in public debate in a physical space in 2024. Danish Institute for Human Rights (2024), p. 10.

and the amounts awarded to them<sup>93</sup>. The Government also provides funding to civil society organisations through a wide range of thematic open calls. On a local level, municipalities are obliged to cooperate with civil society organisations and disburse funding to support voluntary social work by civil society organisations. Some stakeholders consider that the current financing scheme with the Financial Bill entails risks leading to self-censorship, and should be more transparent and foreseeable. The Government announced the intention to put a new funding model in place for 2026<sup>94</sup>. To this end, the Minister for Social Affairs and Housing held a meeting with around 200 participants from a wide range of civil society organisations and representatives of the political system about a new funding model for civil society organisations on 17 December 2024, as well a series of bilateral discussions with representatives from civil society organisations<sup>95</sup>.

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<sup>93</sup> Stakeholders referred to example of civil society organisations having experienced pressure and negative statements from politicians about their activities or advocacy work and calling for cutting their funding, ahead of the parliamentary vote on the Financial Bill 2025. They considered this as having a particularly negative effect on the freedom of speech of civil society organisations, leading to self-censorship. *Nyt Europa, Globalt Fokus*. Berlingske (2024a, 2024b), *Radio IIII* (2024). Similar examples were reported in the past. See also 2024 Rule of Law Report, Denmark, p. 20.

<sup>94</sup> Danish Parliament (2024).

<sup>95</sup> Danish Government (2025), written input.

## Annex I: List of sources in alphabetical order\*

\* The list of contributions received in the context of the consultation for the 2024 Rule of Law report can be found at [https://commission.europa.eu/publications/2025-rule-law-report-targeted-stakeholder-consultation\\_en](https://commission.europa.eu/publications/2025-rule-law-report-targeted-stakeholder-consultation_en).

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## **Annex II: Country visit to Denmark**

The Commission services held virtual meetings in April 2025 with:

- Agency for Culture and Palaces
- Danish Bar and Law Society
- Danish Media Association
- Danish Union of Journalists
- Danish Press Council
- Danish Institute for Human Rights
- Globalt Fokus
- Danish Judges Association
- Justitia
- Magtutredning 2.0 project
- Ministry of Business
- Ministry of Culture
- Ministry of Justice
- National Audit Office
- Danish Courts Administration
- Nyt Europa
- Parliamentary 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:

- Amnesty International
- Araminta
- Civil Liberties Union for Europe
- Civil Society Europe
- European Civic Forum
- European Partnership for Democracy
- European Youth Forum,
- International Commission of Jurists
- International Federation for Human Rights (FIDH)
- JEF Europe
- Philea – Philanthropy Europe Association.
- Transparency International