

Ministry of Culture

1. **The 2025 Rule of Law Report recommended Slovakia to: “*[s]trengthen the rules and mechanisms to restore and further safeguard the independent governance and editorial independence of public service media taking into account European standards on public service media.*” Can you kindly indicate relevant developments in relation to this recommendation?**

As already stated in initial input (reply) regarding 2026 and 2005 Rule of law report; the amendment to the Media Services Act, effective from 1 November 2025, has entrusted the competence to monitor and analyze compliance with the guarantees of the independent functioning of the public service broadcaster to the Media Services Council (an independent regulator). So far, the Media Services Council has not registered any proceedings related to the violation of the guarantee of editorial independence of public service media. Given the ongoing preliminary ruling proceedings before the CJEU, which concern certain provisions of the Public Service Broadcaster Act, we consider it appropriate to await the outcome of these proceedings, in which the Slovak Republic will provide its statement.

2. **The 2025 Rule of Law Report recommended Slovakia to: “*[a]dvance with the process to establish legislative and other safeguards to improve the physical safety and working environment of journalists, including the reform of defamation law, taking into account the European standards on the protection of journalists*”. Can you kindly indicate relevant developments in relation to this recommendation?**

In addition to what was already stated in initial input (reply) regarding 2026 Rule of law report we can state that The Platform for the Promotion of Press Freedom and the Protection of Journalists had its recent meeting on 17th of April 2026 and it is fully operational. Comprehensive information about Platform in English can be found at: <https://www.stonplatforma.org/en-page>

Currently the Platform has ongoing consultations/works focusing:

- Methodology for police procedures to protect journalists at risky mass events in cooperation with Presidium of the Police Force (Public order police and Criminal police heads of both departments were present in person during Platform meeting).

[annex No.1 Limité: Methodology Draft / this is a working document and is not intended for publication, distribution of further circulation and is provided to EC for evaluation purposes only within the ROL report.]

- Implementation of measures against strategic SLAPP lawsuits (Head of department of legislation of the Ministry of Justice and National SLAPP contact point were present in person during Platform meeting).
- Concept of an implementation plan and establishment of a system for monitoring and evaluating the implementation of existing recommendations to increase the safety of journalists and other media workers.

Representatives of journalists, media owner associations, independent journalists' ethics bodies, human rights institutions, relevant ministries and police were present during the meeting and are involved in consultations/work.

As for members of the Platform, nominations are complete including participation of the Police, Ministry of Justice, Ombudsman, independent journalist ethics body, media owners associations, Whistle-blowers office, Council for Media Services as well as three independent journalists representatives and National center for human rights. The full list of members participating is provided in annex.

[annex No. 2 Limité: List of active members of the Platform / this document is not intended for publication, distribution of further circulation and is provided to EC for evaluation purposes only]

Only two members out of current 18 still maintain protest by abstention. In regard to protest by abstention, it is important to state that the main nomination criteria are set for the Ministry of Culture of the Slovak Republic, the Ministry of Justice of the Slovak Republic and the President of the Police Force. They may nominate only a person at the level of Director General, Director or National Expert as a representative.

Criteria are also set for three representatives of the journalistic community. They must be a person working at least at the level of editor-in-chief or editor in a media outlet with nationwide coverage that has acceded to the Code of Ethics for Journalists of the Association for the Protection of Journalistic Ethics in the Slovak Republic or have had their own code of ethics for more than five years, which meets standards at least at the level of the Code of Ethics for Journalists and is voluntarily subordinated to a recognized self-regulatory body in the field of ethical self-regulation of journalists.

There is no predetermine appointment criteria set for other entities that nominate members of the Platform - this includes the Government Plenipotentiary for the Development of Civil Society.

[annex No. 3: statute of the Platform]

Further on the matter of protection of Journalists; by the end of May two documents should be submitted to the government by the Ministry of Culture - as it was stated in the initial input (reply) regarding 2026 Rule of law report. These documents are to be consulted with the Platform and will be provided to EC after being approved by the government (one concerning safety of journalist one concerning SLAPP).

Other developed and planned objectives, including independent and civic initiatives, whose activities contribute to the objectives set by the Council of Europe can be found also on:

<https://www.stonplatforma.org/en-page>

All standards are being developed also in cooperation and within the objective of the Council of Europe Campaign for the Safety of Journalists.

<https://www.coe.int/en/web/freedom-expression/slovak-republic-national-chapter>

Defamation question should be addressed to the Ministry of Justice.

3. **Could you please provide us with more information and the reasons behind the draft bill tabled in the Slovak Parliament in November 2025 for the promulgation of an Act amending the Media Services Act which, if adopted, would introduce several structural changes to the Council for Media Services? How, in the government's view, would these changes represent an improvement in particular in relation to securing and enhancing the independence of the regulator?**

The ministry of Culture act as a facilitator regarding the bills proposed by the parliament and has no power to influence its content or proceedings. Non the less, as a part of legislative procedure the parliament presents its legislative proposals to public consultations via the competent ministry that is in charge of the specific legislative act - which is in the case of Act on Media Services the Ministry of Culture. The ministry of Culture when presenting the parliamentary bill for public consultation pointed out in introductory note issues that might arise from adopting the proposed Act amending the Media Services (parliamentary press 100), particularly articles relating to EMFA and AVMSD as well as other issues that would need to be addressed.

[annex No. 4: Ministry of Culture introductory note to public consultation as published]

Though the bill in question is still in the Parliamentary at the time of writing this reply; the relevant parliamentary committee removed this bill from its agenda during this session. Even though the Ministry of Culture cannot influence the parliamentary proceeding regarding the bills that are originated in the Parliament, there are ongoing amicable consultation with the parliamentary representatives where the Ministry is presenting the case for seeking compliance with EU law in respect of the proposed amendments to the Act on Media services.

4. **By means of the Law 256 of 10 September 2025 amending the Act on Media Services and the Publications Act, Slovakia introduced provisions to regulate transparency of state advertising funding. Can you kindly explain whether these provisions have already resulted in reporting under the Acts?**

In addition to what was already stated in initial input (reply) regarding 2026 Rule of law report, the Council for media services published its report for 2025 on 25th March 2026. Comprehensive information regarding state of implementing transparency rules of state advertising funding can be found on page 40 (chapter 3.1) and page 45 (chapter 4.1).

<https://rpms.sk/vyrocnna-sprava-za-rok-2025>

Comprehensive explanation for users and report forms are available at the website of the regulator (council for Media Services) at: <https://rpms.sk/statna-reklama>

5. **We understand that in August 2025 the “right of reply” was replaced by a “right of correction”. Can you kindly explain the significance of this development?**

The change was implemented via parliamentary amendment introduced by the group of MPs. For this reason, the Ministry of Culture cannot provide further reasoning beyond what was presented the MPs in their bill. The reasoning as published on the Parliament's website is attached to this reply.

[annex No. 5: Reasoning given by the MPs when introducing the bill to the Parliament]

As for application and impact; after initial concern; it has been shown that changes have, thus far, not caused significant “disturbance” in practice. The judicial review has been maintained and this provision too has to be interpreted by courts in accordance with applicable judicature of the ECHR. Regarding remarks raised by EC about this provision being viewed as a potential SLAPP, it is important to note that SLAPP by its nature is an abuse of law. The “*SLAPPs take the form of a specific abuse of national legal system* ” which “*is understood as referring to expressly artificial constructions, including claims, partially or fully devoid of reality, not based on facts or created with the aim of obtaining unfair advantage or exploiting the law for other purposes than intended, namely, to cause harm, intimidate or pursue another purpose contra bona mores or as being used in bad faith for ulterior purposes than those manifested in the claims.*” (p.15 Explanatory memorandum to Recommendation CM/Rec(2024)2). Though it can be argued that some legal provisions are more susceptible to abuse than others this does not make them “SLAPP provisions” as such unless the specific provision of law is *Prima facie* SLAPP. *Prima facie* SLAPP provision of law would have to satisfy same scrutiny conditions as SLAPP actions whereas under this scrutiny it should be proven that legal provision is used primarily for deterrence from involvement in issues of public interest via imbalance of power. Ministry of Culture maintains that, even though it did not initiate this legislative change, it did not observe it as *prima facie* legal SLAPP provision in practice.

6. We have taken note of reports suggesting that the media ownership transparency database is not currently functional? Could you please confirm that this is the case?

In addition to what was already stated in initial input (reply) regarding 2026 and 2025 Rule of law report in this matter, we would like to restate that the database in question is delayed due to technical and financing issues, however all information that would be accessible via the database are accessible now to full extent and free of charge to the general public. The database should provide more convenient and comprehensive access; its delay is inconvenience but does not present obstacle to access to information about media ownership. Further information can be found in the Council for Media services annual report and website.

<https://rpms.sk/vyrocnna-sprava-za-rok-2025>

7. We understand that revelations had shown that dozens of journalists, including Jan Kuciak, had been surveilled. Were these cases investigated under the relevant Slovak legislation?

This question should be addressed to Police or/and office of the Prosecutor. Ministry of culture has no special access to information about ongoing investigations. There have been no requests from journalists addressed ministry of culture to further inquire about this issue.