



**COMMISSION STAFF WORKING DOCUMENT**

### *Accompanying the document*

# 2026 Rule of Law Report

## The rule of law situation in the European Union

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## **ABSTRACT**

In Croatia, the process for appointing the new Supreme Court President was concluded. Judicial authorities maintained their efforts to ensure the integrity of judges and state attorneys. The use of electronic communication between courts and users has further increased and amendments would close the gap in the digitalisation of misdemeanour cases. Proposed amendments aim to address the challenges regarding the recruitment of new judges and deputy state attorneys. Some steps have been made to further improve the efficiency of justice, particularly as regards the length of proceedings in litigious commercial and civil cases. Reforms were passed to adapt the system of ‘registrations judges’ to make it compatible with EU law requirements, and to transfer the power to prescribe the implementation of the training for judges from the Ministry of Justice to the President of the Supreme Court.

The implementation of the second Action Plan under the Anti-Corruption Strategy 2021-2030 is ongoing. Significant steps were made as several laws were revised, including the Law on the Office for the Suppression of Corruption and Organised Crime, and institutional changes were introduced to achieve greater efficiency in corruption investigations and prosecutions. Croatia continues to experience a large number of reported corruption crimes, while also the number of initiated investigations has risen, including against several high-level officials. Croatia digitalised the submission of asset declarations by public officials and several sanctions for non-compliance were imposed, although verification remains non-systematic. The Government has increased the resources of the Commission for the Resolution of Conflicts of Interest for lobbying oversight, while several challenges remain, including certain limitations of the information included in the lobbying register. The Ministry of Justice has published the first report on the application of the Code of Ethics for civil servants and employees at State level. Amendments to improve the whistleblower protection law entered into force. While authorities are carrying out systematic verifications, the timely reporting of party and campaign finance continues to present challenges. A comprehensive public procurement reform entered into force to enhance transparency, efficiency and digitalisation.

Amendments to the media law enlarged the regulatory mandate of the independent media regulator to also cover press, and expanded the database of media ownership and financing to include print media, while stakeholders’ concerns persist regarding the oversight of indirect ownership. The same law revised the relevant framework for state advertising and entered into force. There are ongoing concerns regarding the availability of stable financing for public service media. Efforts to improve the safety of journalists continued, as journalists called for measures to strengthen and protect their profession. The financial and governance dependence of local radio and media publishers on local government is linked to concerns about their editorial independence. Meanwhile, a law to address the issue of strategic lawsuits against public participation (SLAPP) targeting journalists has entered into force and a new law on access to information is in preparation.

Local and regional authorities started publishing draft regulations on the public consultations portal, and the impact assessments and evaluations of laws increased. Government authorities further improved the implementation of the recommendations of the People’s Ombudsperson. The opportunities for multiannual funding of the civil society organisations expanded.

## **RECOMMENDATIONS**

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the relevant commitments made under the Recovery and Resilience Plan, and the country-specific recommendation under the European Semester on the efficiency of the justice system, the Commission concludes the following:

- Some progress has been made on the recommendation to improve the efficiency of justice, particularly as regards the length of proceedings in litigious commercial and civil cases as the total backlog further decreased, while the length of proceedings continues to be a serious concern. Therefore, it is recommended to Croatia to *continue efforts to improve efficiency of justice, including by introducing case management reforms in litigious commercial and civil cases.*
- Significant progress has been made with a view to further increase the efficiency of investigations and prosecution of corruption offences, as the Criminal Procedure Code, the Law on the State Attorney's Office, and the Law on the Office for the Suppression of Corruption and Organised Crime entered into force. As the effects in practice still need to materialise, it is recommended to Croatia to *take measures to further develop a track record of effective investigations, prosecutions and final judgments in corruption cases, including high-level corruption, including by further improving specialised technical capacities.*
- As control rates of asset declarations remain low due to inconsistent, incomparable data structures preventing machine-analysis, it is recommended to Croatia to *step up digitalisation efforts to ensure effective and systematic verification of asset declarations.*
- Some further progress has been made to address the issue of strategic lawsuits against public participation targeted at journalists, in light of the entry into force of the law on the Protection of Persons Involved in Public Activities, while challenges remain. Therefore, it is recommended to Croatia to *broaden the range of available safeguards to improve the protection of journalists, including by reviewing the legal provisions on defamation and encouraging wider use of procedural rules that allow dismissing groundless lawsuits, taking into account the European standards on the protection of journalists.*

As regards the other 2025 recommendations, the Commission concludes that:

- Some progress has been made to strengthen the legal framework and oversight mechanisms to ensure a fair and transparent allocation of state advertising at national, regional and local level, including the public tender procedure, as the legislation was amended, while the operational guidance to be adopted by the media regulator remains outstanding. Given that the topics of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

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

### Independence

**The level of perceived judicial independence in Croatia continues to be very low among both the general public and companies.** Overall, 27% of the general population and 28% of companies perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2026<sup>2</sup>. Among the general public, this figure has slightly decreased in comparison with 2025 (28%) and has significantly increased in comparison with 2022 (20%). The perceived judicial independence among companies remains at the same level as in 2025 (28%) and has increased in comparison with 2022 (23%). The main reasons cited by the general public and by companies for the perceived lack of independence of courts and judges are the perception of interference or pressure from the Government and politicians, and of interference or pressure from economic or other specific interests<sup>3</sup>.

**The process for appointing the new Supreme Court President was concluded.** An acting President was leading the Supreme Court since March 2025<sup>4</sup> and the third attempt to appoint a new President successfully led to Parliament’s appointment of a new Supreme Court President on 15 May 2026<sup>5</sup>. The President of the Supreme Court is appointed by Parliament upon a proposal from the President of the Republic. Three positions for members of the Constitutional Court are still vacant, following an unsuccessful vote in Parliament.

**Judicial authorities maintained their efforts to ensure the integrity of judges and state attorneys.** The State Judicial Council received 52 requests to enable the initiation of criminal proceedings against judges and, at the request of competent authorities, started 11 disciplinary proceedings in relation to judges, which also concluded with 2 dismissals<sup>6</sup>. Additionally, the State Judicial Council verified external activities of judges<sup>7</sup>. In 2025 the State Attorney’s Council received no further requests from the competent authorities to start disciplinary proceedings regarding state attorneys. The State Judicial Council and the State Attorney’s Council, assisted by their own human resources and access to the electronic

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

<sup>2</sup> 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%).

<sup>3</sup> Figures 49 and 51, 2026 EU Justice Scoreboard.

<sup>4</sup> The Supreme Court and representatives of the judiciary indicated that while allowing this post to remain vacant until agreement was found on a new President did not prevent the Supreme Court from performing its functions, it could have affected how it is perceived by the public and affected the morale within the court. Supreme Court (2026b). Country visit Croatia, Supreme Court and Association of Croatian Judges.

<sup>5</sup> Two prior selection processes were unsuccessful. The procedural rules for appointment are explained in more detail in the 2021 Rule of Law Report, Croatia, pp. 3-4, and 2022 Rule of Law Report, Croatia, p. 4.

<sup>6</sup> Out of these, in 47 cases the requests to initiate criminal proceedings were denied after the Council verified that prosecution service had no open investigations, while in 2 cases the request was granted and in 1 it was dismissed (2 cases ongoing in March 2026). In March 2026, the State Judicial Council kept 8 judges under suspension due to ongoing criminal proceedings, and 3 due to ongoing disciplinary proceedings. The number of initiated disciplinary proceedings remained the same as in 2024. In 2025, the Council issued 8 disciplinary sanctions (7 in 2024): 4 fines, 1 reprimand, one conditional dismissal and 2 dismissals. Croatian Government (2026b), written input, p. 2, and State Judicial Council (2026), written input.

<sup>7</sup> In 2025, the State Judicial Council received 53 requests from judges regarding external activities, approving 50 and rejecting 3. State Judicial Council (2026), written input.

registers, checked all annual updates of asset declarations of judges and state attorneys<sup>8</sup>, and started one disciplinary proceeding regarding a judge for not submitting a declaration for a substantial change in assets, while finding no other substantial irregularities. In May-June 2026, the Supreme Court conducted the procedure for the supervision of the performance of court administration at two municipal courts<sup>9</sup>.

**The system of ‘registrations judges’ has been reformed to make it compatible with EU law.** In January 2026, the Law on Courts was amended to address requirements set out in the case law of the Court of Justice of the European Union (Court of Justice) as regards the ‘registrations judges’ system<sup>10</sup>. The amendment removes the possibility for registrations judges to suspend the delivery of an adopted judgment for inconsistency with case law. Instead, a judge or department of judges will be tasked with monitoring case law at all court levels and assisting courts to improve the consistency of decisions<sup>11</sup>. In the lower courts, these departments will support judges in finding relevant case law; at the appeal courts and the Supreme Court they will receive draft judgments and may inform the panel when a draft might create inconsistency<sup>12</sup>. At the Supreme Court, departing from precedent would require the Supreme Court President to transfer the case to an expanded panel<sup>13</sup>. The parties to the case would be informed about such transfers and about the composition of the expanded panel. Stakeholders have broadly welcomed these changes<sup>14</sup>.

## Quality

**The power to prescribe the implementation of the training for judges was transferred from the Ministry of Justice to the President of the Supreme Court.** The competence to impose professional development obligations on judges and court presidents was transferred from the Minister of Justice to the Supreme Court President, which the authorities consider better suited to the functioning of the justice system and the professional development needs

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<sup>8</sup> A related milestone 214 (Electronic tools provided and adequate administrative capacities for the State Judicial Council and the State Attorney's Council in the Recovery and Resilience Plan for Croatia) was considered fulfilled in 2022.

<sup>9</sup> The supervision focussed on administrative oversight of the court presidents’ decisions on annual work distribution among judges and related efficiency challenges, with the Supreme Court President issuing conclusions on remedying the deficiencies in court administration. Supreme Court (2026a).

<sup>10</sup> Judgment of the CJEU, Joined Cases C-554/21 *Hann-Invest*, C-622/21 *Mineral-Sekuline* and C-727/21 *Udruga Khl Medveščak Zagreb*. The CJEU ruled in a preliminary ruling request of the High Commercial Court regarding a practice in courts of second instance whereby ‘registrations judges’ (judges outside the panel deciding a case tasked with registering adopted judgments and performing a post-hoc case law review), when finding a judgment inconsistent with case law or the ‘legal position’ previously accepted at that court, could stay the delivery of the adopted judgment and request that a section meeting be convened. A ‘legal position’ adopted at a section meeting would be binding on all judicial panels belonging to the section; See also 2025 Rule of Law Report, Croatia, p. 4, and 2024 Rule of Law Report, Croatia, p. 7.

<sup>11</sup> Such judges or departments would be set up at first instance Municipal, Commercial and Administrative Courts, and such departments would be set up at second instance County Courts, High Commercial, High Administrative, High Misdemeanour and High Criminal Courts, and at the Supreme Court.

<sup>12</sup> According to the adopted amendments, this would concern either a situation in which the draft judgment diverges from the court’s established case law or when the court’s practice is not consistent.

<sup>13</sup> In December 2025, amendments to the Civil Procedure Law came into force and redefined the expanded panel of the Civil Chamber in the Supreme Court, which include the President of the Civil Chamber, the judge-rapporteur of the panel to which the case was assigned, the Head of the Department for monitoring and studying the case law of the Civil Chamber and 10 judges determined by random selection. Amendments to the Criminal Procedure Code are in preparation to introduce a similar expanded panel also in the Criminal Chamber in the Supreme Court. Croatian Government (2026b), written input, pp. 7-8.

<sup>14</sup> Country visit Croatia, Association of Croatian Judges and Centre for Democracy and Law – Miko Tripalo.

of judges<sup>15</sup>. The law was also amended expressly to prohibit judges from receiving gifts, which until the entry into force of these legislative amendments was partly regulated by the Code of Judicial Ethics<sup>16</sup>.

**The use of electronic communication between courts and users has further increased and amendments would close the gap in the digitalisation of misdemeanour cases.** The justice system has seen some further improvements in digitalisation<sup>17</sup>. In 2025 the eFile system was migrated to the State information infrastructure to ensure stability and improve accessibility. The connection of the e-communication and e-citizen systems already allows the submission of court documents, access to case files and requesting of criminal record extracts<sup>18</sup>. The Government on 29 June 2026 submitted for the second reading in Parliament amendments to the Law on Misdemeanours to introduce e-Communication in misdemeanour cases before the misdemeanour departments of municipal courts, as well as before the Misdemeanour Courts in Zagreb and Split, which is expected to speed up these proceedings, facilitate faster exercise of rights for citizens and reduce procedural costs. These amendments would also prescribe, as from July 2027, mandatory audio recording of the hearings in misdemeanour court proceedings, which is expected to shorten the duration of the main hearing<sup>19</sup>. In 2025, the overall use of the e-Communication system further increased, mostly among professional users and ministries<sup>20</sup>. By March 2026, more than 600 000 new court decisions from all court instances were published in the new online system, thus increasing public access to judgments<sup>21</sup>.

**Proposed amendments aim to address the challenges regarding the recruitment of new judges and deputy state attorneys.** In view of the decreasing numbers of judges and deputy state attorneys (judicial officials) employed in courts and state attorney offices<sup>22</sup> and lagging new intake into the professions<sup>23</sup>, the Government on 29 June 2026 submitted to Parliament

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<sup>15</sup> The changes were introduced in amendments to the Law on Courts, which entered into force on 1 January 2026. Croatian Government (2026b), written input, pp. 5-6.

<sup>16</sup> The law also clarified the exceptions to this rule (ordinary gifts among family members and friends, and state and international awards). Croatian Government (2026b), written input, p. 6.

<sup>17</sup> Figures 39-47, 2026 EU Justice Scoreboard. The electronic tools improved in the availability of electronic communication tools at courts (Figure 42), and more significantly in the online accessibility to published judgments (Figure 46) and the arrangements for producing machine-readable judicial decisions (Figure 47).

<sup>18</sup> Croatian Government (2026), written input, p. 6. A related milestone 224 in the Recovery and Resilience Plan for Croatia (Upgraded eSpis system with new functionalities and new architecture integrated into the Shared Services Centre) was considered fulfilled in 2025.

<sup>19</sup> Croatian Government (2026b), written input, p. 7.

<sup>20</sup> In 2025, the total volume of incoming documents arriving to courts electronically further increased to nearly 1.7 million, with largest increases among lawyers, ministries and court experts. For example, before commercial, municipal and administrative courts, the lawyers submitted 55-68% of their documents electronically. Outgoing electronic communication from courts to court parties and legal professionals substantially increased to 3.8 million documents (3.4 million in 2024). Croatian Government (2026b), written input, additional written input, pp. 1-6.

<sup>21</sup> A related milestone 226 (All new first and second instance court decisions ending proceedings are anonymised and published on the portal.) in the Recovery and Resilience Plan for Croatia was considered fulfilled in 2025. See Figure 46, 2026 EU Justice Scoreboard for a comparative perspective on the publication of judgments.

<sup>22</sup> The total number of judicial officials decreased from 2 508 in 2014 to 2 316 in 2024, while the number of judges decreased from 1 903 to 1 660. Ministry of justice, administration and digital transformation (2026).

<sup>23</sup> According to the ministry, intake of new judges, state attorneys and judicial officials into the system is lagging the rate at which they leave the service. 30% of judicial officials are aged between 60 and 70, while only 7% are aged between 30 and 40. 35% of judges (572), are aged between 60 and 70, while only 6% of are between 30 and 40. 20% of state attorneys are aged 60 to 70. Ministry of justice, administration and digital transformation (2026b).

for adoption the final drafts of the amendments to the Law on the Judicial Academy, Law on State Judicial Councils and the Law on the State Attorney's Council that would simplify entry into the professions of judges and deputy state attorneys. These amendments would remove the requirement to pass exams in the State School for Judicial Officials to become a judge or deputy state attorney and would redefine the State school into a training centre within the Judicial Academy for already appointed judges and state attorneys<sup>24</sup>.

## Efficiency

**There has been some progress on the recommendation to improve the efficiency of justice, particularly as regards the length of proceedings in litigious commercial and civil cases<sup>25</sup>.** The 2026 EU Justice Scoreboard shows that backlogs and length of proceedings continue to be a serious concern, despite some improvements in reducing the length and backlog in litigious civil and commercial cases<sup>26</sup>. At the year-end of 2025, the total backlog further decreased (by nearly 3% compared to the year-end 2024), including in litigious civil and commercial cases (by 2%)<sup>27</sup>. Despite improvements in some types of cases, such as litigious civil cases and bribery cases, the average length of proceedings in most cases increased, which remains an important concern. In 2025, the average length of proceedings in the first instance courts remained among the longest in the EU with 1 182 days in litigious commercial cases (1 147 days in 2024) and 776 days in litigious civil cases (797 in 2024)<sup>28</sup>. While the average length of proceedings decreased in first instance administrative cases (256 days, 278 in 2024) and first instance criminal cases before county courts (652 days, 779 days in 2024), it increased in first instance criminal cases before municipal courts (785 days, 752 days in 2024). In narrower category, in 2024, the average length of proceedings before first instance courts further decreased in bribery cases (107 days, 478 days in 2023)<sup>29</sup>. Considering the overall reduction in the backlog, including in litigious civil and commercial cases, and the decrease in length of proceedings particularly in litigious civil and administrative cases, there has been some progress on the implementation of the recommendation.

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<sup>24</sup> Among the reasons for the proposed reform was the unnecessary duplication of the exam in the State School for Judicial Officials with the Bar Examination. Ministry of justice, administration and digital transformation (2026b).

<sup>25</sup> The 2025 Rule of Law Report recommended Croatia to “take measures to further improve the efficiency of justice, particularly as regards the length of proceedings in litigious commercial and civil cases”.

<sup>26</sup> The data for 2024 continue to show particular challenges in litigious civil and commercial cases, and all non-criminal cases (Figures 5, 12, 13 of the 2026 EU Justice Scoreboard), where lengths of proceedings and backlogs, despite some improvements, remained among the highest in the EU. In the context of the European Semester, the Commission has proposed that the Council recommend that Croatia “[f]urther improve[s] the efficiency of the justice system”. European Commission (2026) 211 final, CSR 3.

<sup>27</sup> The total number of pending cases across all courts at the end of 2025 amounted to 404 621 (416 879 at the end of 2024), which represents a 7% decrease compared to 2023. However, at the end of 2025, the number of pending cases older than ten years and seven years slightly increased. Croatian Government (2025), written input, pp. 7-8, and Ministry of justice, administration and digital transformation (2026a).

<sup>28</sup> A related target 221 (Reduction of the duration of litigation and commercial cases) is part of the 10th payment request, hence it has not yet been assessed by the Commission.

<sup>29</sup> Figures 20 and 21, 2026 EU Justice Scoreboard. A related target 238 (Reducing the average length of court cases for corruption and organized crime offences) in the Recovery and Resilience Plan for Croatia was considered fulfilled in 2025.

## II. ANTI-CORRUPTION FRAMEWORK

**The perception among experts, citizens and businesses is that the level of corruption in the public sector remains high.** In the 2025 Corruption Perceptions Index by Transparency International, Croatia scores 47/100, ranks 24<sup>th</sup> in the European Union and 63<sup>rd</sup> globally<sup>30</sup>. This perception remained relatively stable over the past five years<sup>31</sup>. The 2026 Special Eurobarometer on Corruption shows that 88% of respondents consider corruption to be widespread in their country (EU average 71%) and 61% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 94% of companies consider that corruption is widespread (EU average 65%) and 62% consider that corruption is a problem when doing business (EU average 37%). Furthermore, 49% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 38%), while 20% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 31%)<sup>32</sup>.

**The 2025 Report on the implementation of the second Anti-Corruption Action Plan (2025-2027) is being finalised.** As part of the 2021-2030 Anti-Corruption Strategy<sup>33</sup>, the second Action Plan<sup>34</sup> contained 63 actions for 2025, covering legislative, institutional and preventive measures to strengthen public sector integrity, transparency and accountability. Key actions implemented in the course of 2025 included, among others, enhanced lobbying regulations, stricter whistleblower protection and a new specialised anti-corruption court division in Varaždin. The main initiatives planned for 2026 include amendments to the act on rights to access to information and to the public procurement legislation<sup>35</sup>. Apart from the regular implementation monitoring, an independent final evaluation of the strategy is envisaged for 2030.

**There has been significant progress on the recommendation to revise laws to further increase the efficiency of corruption investigations and prosecutions<sup>36</sup>.** The amended Law on the Office for the Suppression of Corruption and Organised Crime entered into force on 13 November 2025. The changes aim to accelerate and decentralise complex, high-level corruption investigations and prosecutions of the specialised prosecution service (USKOK)<sup>37</sup>. Key amendments include jurisdictional changes to decentralise and reduce the workload of

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<sup>30</sup> Transparency International (2026), Corruption Perceptions Index 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>31</sup> In 2021, the score was 47, while in 2025, the score was 47. 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>32</sup> Data from Special Eurobarometer 573 (2026) and Flash Eurobarometer 582 (2026).

<sup>33</sup> Croatian Government (2021), Corruption Prevention Strategy for the period 2021-2030. See related RRP milestone 238.

<sup>34</sup> Croatian Government (2025), Action Plan for the period from 2025 to 2027.

<sup>35</sup> Country visit Croatia, Ministry of Justice, Administration and Digital Transformation, amendments to the access to information act were previously envisaged for 2025 and will be based on an already finalised evaluation (see related milestone 243).

<sup>36</sup> The 2025 Rule of Law Report recommended Croatia to “take forward plans to revise the Criminal Procedure Code and the Law on the Office for the Suppression of Corruption and Organised Crime, in line with the Anti-Corruption Strategy, so as to further increase the efficiency of investigations and prosecution of corruption offences”. Some progress was previously assessed on this recommendation in 2025 and 2024.

<sup>37</sup> Croatian Government (2026b), written input, p. 2. These efforts aim to align with OECD standards.

courts that deal with USKOK cases<sup>38</sup>. The judges presiding the panel in these cases are now obliged to prioritise USKOK cases and to concentrate the number of hearings<sup>39</sup>. More serious and complex corruption cases, as well as those concerning a public official and abuse of office, remain in the competence of USKOK<sup>40</sup>, which may also transfer corruption cases to competent municipal or county state attorneys<sup>41</sup>. The law lowered the seniority requirements to be eligible for the post of the USKOK Director and limited the tenure to two consecutive terms<sup>42</sup>. Beyond this, amendments to the Criminal Procedure Code entered into force in February 2026 introducing an *in camera* procedure for the speedier examination at the indictment stage without the participation of the parties<sup>43</sup>. Amendments to the Criminal Code entered into force in November 2025, now criminalising all acts of bribery of members of Parliament (both national and foreign) in one provision<sup>44</sup> and providing for new rules of jurisdiction regarding the liability of legal persons<sup>45</sup>. Since January 2026, a new specialised court department for corruption and organised crime established at the County Court in Varaždin is operational. Overall, there has been significant progress on the implementation of the recommendation.

**Authorities are further developing a track record of investigations, prosecutions and convictions, including in high-level cases.** Corruption occurrence is still high. At the same time, authorities are actively pursuing corruption and several high-level officials are under investigation<sup>46</sup>. The length of USKOK-led proceedings was overall shorter in 2025 compared to 2024, with a higher share of investigations concluded within a year and fewer lasting longer<sup>47</sup>. The amendments to the Criminal Procedure Act aim to address a bottleneck

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<sup>38</sup> The jurisdiction of the County Court in Varaždin would be extended to cover USKOK corruption cases of the Zagreb and Bjelovar County Courts; the Rijeka County Court to cover the Karlovac County Court cases.

<sup>39</sup> Amended Art. 30, Law on the Office for the Suppression of Corruption and Organised Crime.

<sup>40</sup> Art. 21 (1) and (2). Municipal prosecutors are now by law obliged to inform USKOK.

<sup>41</sup> *Ex-officio* corruption prosecutions of municipal and county prosecutors may also be taken over by USKOK. Specific criteria for USKOK intervention or transfer of cases are, however, not stipulated in the law.

<sup>42</sup> The introduced time limit serves to reduce risks of abuse of office. The seniority requirements for the USKOK Director were reduced from 15 to 10 years, allowing for a wider pool of eligible candidates. On 23 December 2025, a new Director of the USKOK was appointed for a period of four years.

<sup>43</sup> A hearing before the indictment chamber is only envisaged when a judgment is to be delivered following a plea bargain (which is the case in most corruption cases) and when deciding on the admissibility of evidence. To expedite proceedings, no appeal is allowed against the exclusion of illegally obtained evidence.

<sup>44</sup> The offence covers the giving, offering or promising of a bribe in relation to all acts and omissions of members of Parliament, including acts outside the legislative process, acts prior to the vote and voting itself, at national, European and international level, merging Arts. 293 and 294 in Art. 339 Criminal Code

<sup>45</sup> Jurisdiction for legal persons is now based on their registration in Croatia, irrespective of the natural persons.

<sup>46</sup> The State Attorney's Offices received more corruption notifications (1 979 alleged corruption suspects in 2025; 1 464 in 2024). While 86% of these notifications were dismissed as lacking ground, the State Attorney's offices in 2025 initiated corruption investigations for 262 individuals - considerably more than in 2024 (149). State Attorney's Office (2026), p. 248. Cases involve former ministers, members of Parliament, police, state attorneys, judges, court presidents, mayors, representatives of state-owned enterprises, tax administration officials, and heads of state oversight institutions. Croatian Government (2026b), written input, pp. 19-22. In 2026, investigations into alleged corruption concerning several sports associations started.

<sup>47</sup> In 2025, 42% of investigations finished within 6 months (42% in 2024), 85% within a year (69% in 2024). Investigations of more than a year decreased to 14% (31% in 2024). State Attorney's Office (2026), pp. 192-193.

identified by the State Attorney's Office in the indictment panels before the courts<sup>48</sup>. More than half of the convictions in USKOK corruption cases, including in high-level corruption cases, were based on plea bargaining agreements between the defendants and the State Attorney's Office without a full trial taking place<sup>49</sup>. The specialised anti-corruption prosecution service (USKOK) and the specialised anti-corruption police (PNUSKOK) continue to view the level of access to relevant registries<sup>50</sup> and of cooperation between the relevant national state agencies as adequate to carry out their tasks<sup>51</sup>. The revised Law on the State Attorney's Office adopted in October 2025 allows the State Attorney General to establish specialised teams as advisory, instructive and coordinating bodies<sup>52</sup>. While human and financial resources are increasing, the high turnover of staff in USKOK continues to present a challenge<sup>53</sup>. The EPPO highlighted shortcomings in the level of specialisation and expertise of the police and a lack of necessary technical equipment to investigate complex EPPO cross-border corruption cases, with the police responding by providing specific training for the officers working with the EPPO<sup>54</sup>. As a mitigation measure, the Government is investing in both, in order to enhance technical capacities<sup>55</sup>. There are also challenges regarding law enforcement's expertise and proactive investigations of foreign bribery, with no cases initiated to date, but the Government aims to report back to the OECD on its enforcement efforts by December 2026<sup>56</sup>. The extent to which the recent amendments to the Criminal Procedure Code, the Law on the State Attorney's Office and to the Law on the Office for the Suppression of Corruption and Organised Crime will increase the effectiveness of investigation and prosecution of corruption offence in practice will need to be assessed based on monitoring enforcement.

**Croatia digitalised the submission of asset declarations by public officials and several sanctions for non-compliance were imposed, although verification remains non-systematic.** Croatia's comprehensive legal framework obliges all elected officials, public officials, state attorneys and judges to submit conflicts of interest and asset declarations<sup>57</sup>. The Commission for the Resolution of Conflicts of Interest (CRC) checks all declarations under their jurisdiction as to their technical correctness<sup>58</sup>. The veracity of the declaration's

<sup>48</sup> At year-end 2025, the indictment panels' backlog had increased by 23%. In 2025, 142 persons were convicted for corruption, the lowest in 4 years (301 in 2024). The conviction rate for corruption remained high at 96% as in 2024. State Attorney's Office (2026), pp. 193-194, 249.

<sup>49</sup> 88 out of 142 convicted persons. Country visit Croatia, PNUSKOK and USKOK. State Attorney's Office (2026), p. 248. RRP target 238 (Reducing the average length of corruption and organised crime court cases) was fulfilled in 2025.

<sup>50</sup> The EPPO does not have a direct access to the Tax Administration's databases. Negotiations for a Working Arrangements were interrupted. EPPO (2026), pp. 32-33.

<sup>51</sup> This includes cooperation with the FIU, the tax and customs authorities. Country visit Croatia, PNUSKOK and USKOK; 2025 Rule of Law Report, Croatia, p. 7.

<sup>52</sup> The team members do not have specific powers on the state attorney's handling individual cases, remaining autonomous and independent. Croatian Government (2026b), additional written input, p.1; Country visit Croatia, Attorney General.

<sup>53</sup> Country visit Croatia, USKOK.

<sup>54</sup> Country visit Croatia, PNUSKOK; EPPO (2026), p. 32.

<sup>55</sup> Including trainings for police officers by the Police Academy and the College of Criminal Justice and Public Safety and EU bodies.

<sup>56</sup> Country visit Croatia, Ministry of Justice, no cases of active investigations or convictions were reported. OECD (2024).

<sup>57</sup> Law on the Prevention of Conflict of Interest and other relevant laws. RRP milestone 232 (Adoption of the new Law on the Prevention of Conflict of Interest) was considered fulfilled in 2022.

<sup>58</sup> In 2025, five staff were in charge of 4 300 submitted asset declarations and one additional counsellor was recruited. Croatian Government (2025), written input, p. 10. The election of new CRC members, not exclusively dedicated to asset verification, is in parliamentary procedure. Country visit Croatia, CRC.

content is checked for selected officials on an annual risk-based verification prioritisation plan<sup>59</sup>. The low control rates are reportedly due to the complexity of the verification procedure and the inconsistent, incomparable data structure, preventing machine-analysis<sup>60</sup>. Several sanctions for non-compliance, including against ministers, were imposed<sup>61</sup>. Stakeholders point out that the level of fines may act as an insufficient deterrent<sup>62</sup>. Croatia's asset declaration system has improved in terms of digitalisation, facilitating public officials' electronic submission of their declarations<sup>63</sup>, while the tool for comparing asset declarations, as part of a broader IT platform, remains under construction<sup>64</sup>. The CRC continues to note that it can only carry out manual verifications and that the system does not yet allow for automatic notifications of discrepancies between declarations and data in other registries, making cross-verification challenging<sup>65</sup>. In November 2025, the Parliament appointed a new president of the CRC<sup>66</sup>.

**The Government has increased resources for lobbying oversight, while several challenges remain, including certain limitations of the information included in the lobbying register.** In 2025, both human and financial resources of the Commission for the Resolution of Conflicts of Interest (CRC) dedicated to lobbying oversight were increased<sup>67</sup>. While the Government confirms that the register is harmonised with the existing legislative framework, the competent entity for the lobbying register's maintenance (CRC) called for further legal revisions to address the shortcomings it has identified a year after the register's operation. These include ambiguities in the personal scope and in conflicting definitions of gifts in the Law on Lobbying and the Law on the Prevention of Conflicts of Interest, with risks of legal uncertainty<sup>68</sup>. The lobbying register is publicly available and includes certain data on interest representatives to be updated every two years<sup>69</sup>. The register could be further improved by adding details on the specific legislation or decisions targeted in the lobbying process, the interest representatives' available lobbying budget or expenses invested, and on

<sup>59</sup> 2025 Rule of Law Report, Croatia, p. 9. Due to limited oversight capacities, the CRC's prioritisation strategy focused on high-level officials in 2024 (President, Prime Minister, ministers), and in 2025 on State Secretaries, local officials and local company board members. The CRC can also launch content verification procedures *ex-officio* upon suspicion raised by complaints or media reports.

<sup>60</sup> OECD (2025), p. 10. Of the 3 000 asset declarations, 50 are verified per year, 2025 Rule of Law Report, Croatia, pp. 8-9.

<sup>61</sup> E.g. CRC (2025); CRC (2025a); CRC (2025b); EDUS Lexpera (2026).

<sup>62</sup> Country visit Croatia, GONG, Centre for Peace Studies, Human Rights House, Crosol, DKolektiv, also highlighting the lack of systematic verification controls of high-ranking government officials and the failure to include indexation of the real estate value.

<sup>63</sup> RRP milestone 241 (Improved asset declaration information systems for state officials and judicial officials) fulfilled in 2025. An IT tool connected to the tax authority allows officials to automatically retrieve data about their own and their spouse's assets from existing state registries, such as land, vehicle and tax. 2025 Rule of law Report, Croatia, p. 9. Alignment with the land registry data remains an issue.

<sup>64</sup> The CRC can only retrieve data of the current year, but not of previous years, and needs to check different registers and request information. Country visit Croatia, CRC. 2025 Rule of Law Report, Croatia, p. 9.

<sup>65</sup> Country visit Croatia, CRC. Illicit wealth checks are not part of the CRC's mandate, but suspicious cases can be submitted to the police and prosecution service. No such referral occurred in 2025.

<sup>66</sup> 2025 Rule of Law Report, Croatia, pp. 8-9.

<sup>67</sup> Three new counsellors were recruited for the lobbying oversight service, while the CRC's budget increased by 20% compared to 2024. Croatian Government (2026b), written input, p. 10.

<sup>68</sup> It is unclear which managerial level is under an obligation and what constitutes a lobbying activity, and whether experts are considered lobbyists. Country visit Croatia, CRC; EDUS Lexpera (2025). The Law on Lobbying prohibits any gift or benefit; the Law on Conflict of Interest excludes gifts as of a certain amount.

<sup>69</sup> CRC, Lobbying Register, <https://www.sukobinteresa.hr/hr/lobiranje>, including the name of the natural/legal person, contact details and general areas of activity. By February 2026, 64 legal persons had registered.

the actual lobbying meetings that took place<sup>70</sup>, which would increase the transparency<sup>71</sup>. While public officials are obliged to disclose lobbying meetings of importance, there are no criteria or practical guidance to define this, and disclosure practice is fragmented<sup>72</sup>. Stakeholders, including standards bodies, have indicated that the lobbying register is insufficiently comprehensive and lacks a comprehensive public record of lobbying inputs and contacts ('legislative footprint') to strengthen transparency of decision-making<sup>73</sup>.

**The Ministry of Justice has published the first report on the application of the Code of Ethics for civil servants and employees at State level.** The Code of Ethics for civil servants and employees at State level entered into force in 2025<sup>74</sup>. The report details the submitted recommendations and complaints about the conduct of civil servants in state bodies. For the first time, the data supporting the report were submitted exclusively via the electronic *eEtika* information system, speeding up and thus enhancing more effective data collection from the Ethics Commissioners appointed in every state and judicial authority to monitor compliance and receive complaints<sup>75</sup>. As regards the 2022 Code of Conduct for high-level officials<sup>76</sup>, including ministers and state secretaries, the Implementation Council does not have sanctioning powers to enforce the rules of the Code on integrity, conflicts of interest, gifts, and post-employment. Instead, mitigating measures in response to the recommendations of the Implementation Council as a preventive body remain at the discretion of the State entity where the concerned public official works<sup>77</sup>. While statistics exist on the CRC's caselaw and the sanctions imposed, there are no statistical data on the number of conflicts of interest detected, recommendations issued, and mitigation measures applied<sup>78</sup>.

**Amendments to improve the whistleblower protection law entered into force.** Since 13 November 2025, new whistleblowing rules extended the protection to individuals who report

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<sup>70</sup> Interest representatives must report to the CRC by end of March each year, including on meetings, but these data are not recorded in the lobbying register, and are made available only following access to information requests. 2025 Rule of Law Report, Croatia, p. 10. RRP milestone 237 (Setting up an IT platform to monitor the implementation of national anti-corruption measures) is not yet fulfilled (as part of the future 9th payment request).

<sup>71</sup> This criticism was also expressed by the OECD and civil society (Civil Liberties Union for Europe (2025)). OECD identified some areas which could be aligned with best practice, e.g. the definition of lobbying is narrow as it only focuses on direct communications with a lobbied person, and the list of exemptions is quite broad, including persons participating as experts in government meetings. OECD (2024).

<sup>72</sup> Meetings are disclosed either on the authority's website or on social media. Neither the Code of Conduct for State Officials in Executive Bodies nor the 2025 Guidelines on the basic obligations of lobbied persons define precisely what 'important meetings' are, leaving it to the discretion of the reporting person. OECD (2024), p. 27. There is currently no requirement for the proactive disclosure of ministers' agendas.

<sup>73</sup> See also GRECO (2026), recommendation v, paras. 24-29, pp. 6-8; OECD (2024b), recommendation (III); and Liberties (2026), p. 153.

<sup>74</sup> 2025 Rule of Law Report, Croatia, p. 9.

<sup>75</sup> Country visit Croatia, Ministry of Justice. See RRP milestone 240 (Establishment of an information system for the management of the ethical infrastructure of civil servants) fulfilled in 2025.

<sup>76</sup> Code of Conduct for State Officials in Executive Bodies. See RRP milestone 240 (Adoption of a code of ethics for parliamentarians and a code of ethics for officials in the executive) fulfilled in 2025.

<sup>77</sup> One case of the Implementation Council was referred to the CRC, which can impose an administrative sanction (e.g. salary suspension), yet only for breaches of the Law on the Prevention of Conflicts of Interest, but not of the Code of Conduct. It cannot reverse the public official's decision breaching the Code nor enforce information-sharing in case of the public official's lack of cooperation with the CRC, see GRECO (2026), recommendation ii, paras. 14-15, pp. 4-5; GRECO (2020), paras. 92-94, p. 29, highlighting also the need for practical guidance for public officials.

<sup>78</sup> The Commission for Deciding on Conflicts of Interest publishes in its annual reports information on case law and sanctions imposed.

on irregularities<sup>79</sup>. Individuals who report directly to the police or the State Attorney's Office now have the same right to protection as those who submit reports to the Ombudsperson, eliminating previous uncertainties as to when the right to protection was acquired. New deadlines also apply for court proceedings to ensure faster, more effective whistleblower protection in practice, which aims to address the previously indicated lengthy proceedings on retaliatory measures taken against whistleblowers, indicated as discouraging reporting<sup>80</sup>. While the number of internal whistleblower reports to the Ombudsperson's Office dropped in 2025, the Office dealt with many new cases following external reports<sup>81</sup>. The IT anti-corruption platform tool would include a safe electronic submission channel for whistleblower reporting to the Ombudsperson, which is in the testing phase and should be operational in the first half of 2026<sup>82</sup>. The evaluation of the public awareness-raising campaign conducted by the Ministry of Justice found that the public places the highest level of trust for external reporting in the Ombudsperson's Office<sup>83</sup>. Stakeholders consider that the offence introduced to the criminal code in 2024 criminalising unauthorised disclosures of information from ongoing criminal investigations could discourage the reporting of corruption<sup>84</sup>, while the Government maintains that there is no evidence that this provision is deterring whistleblowers from reporting criminal offences.

**The State Audit Office reported no substantial violations of the rules on political party financing, while some shortcomings remain, and the timely reporting of party and campaign finance continues to present a challenge.** In 2025, the State Electoral Commission (SEC), as the oversight body over political party and campaign financing<sup>85</sup>, and the State Audit Office found no substantial violation of political party and campaign financing rules, but concluded on a number of irregularities, as many political parties still fail to fully comply with reporting obligations<sup>86</sup>. Consequently, the SEC adopted several decisions in 2025 on political parties and independent councillors that had not submitted their annual reports on time in 2024 and 2025, withdrawing the right of payment of regular annual funds or temporarily suspending disbursement as sanctions<sup>87</sup>. As for donations, in 2025, the

<sup>79</sup> Including criminal offences against the economy, offences against official duty, embezzlement and bribery of members of legislative bodies (Parliament, international bodies, local councils). See RRP milestone 233 (Adoption of amendments to the Act on the protection of persons reporting irregularities) fulfilled in 2023.

<sup>80</sup> Cf. also 2025 Rule of Law Report, p. 11. Country visit Croatia, GONG, Centre for Peace Studies, Human Rights House, Crosol and DKolektiv, highlighting also the lack of legal aid for legal persons. The Ombudsperson's proposal to regulate psychological support was also not taken up in the Law.

<sup>81</sup> In 2025, 72 new cases were opened due to external reports (46 in 2024), and 31 internal reports (50 in 2024), Ombudsperson Office (2026), additional written input.

<sup>82</sup> Croatian Government (2026b), written input, p. 16, including also a virtual assistant as a separate application in the platform providing information on anti-corruption legislation. RRP milestone 237 (Setting up an IT platform to monitor the implementation of national anti-corruption measures) is under assessment.

<sup>83</sup> Country visit to Croatia, Ministry of Justice, Administration and Digital Transformation. See RRP milestone 239 (Evaluation of the effects of the national information campaign against corruption) fulfilled in 2026.

<sup>84</sup> Art. 307a Criminal Code. Country visit Croatia, Centre for Peace Studies, Human Rights House, Crosol, DKolektiv and GONG. On corruption charges against police officers, see Croatian Government (2025), written input, pp. 21-22. See section III below as to the impact of this article and the access to information.

<sup>85</sup> The subjects of oversight include political parties, independent members of Parliament and independent councillors.

<sup>86</sup> See State Audit Office report (2026) 2025 data, <https://www.revizija.hr/reports/677>, and State Election Commission report, <https://www.izbori.hr/site/UserDocsImages/5471>.

<sup>87</sup> 25 independent councillors and three political parties failed to submit the 2023 annual reports on time (33 decisions on losing the right of payment), and 28 councillors and four political parties for the 2024 reports (38 decisions temporarily suspending payments).

SEC notified the State Attorney's Office of about 77 cases in which political parties and independent members of Parliament had either failed to submit the required half-yearly report (50 cases) or had failed to submit it on time (27 cases)<sup>88</sup>. For donations and expenditures, the political party and campaign financing law sets upper ceilings for donations, and donations through third-parties are prohibited. There are, however, no regulations regarding third-party campaigning<sup>89</sup> and corporate donations from companies involved in public contracts<sup>90</sup>.

**The Government is implementing a comprehensive public procurement reform, which could contribute to reducing corruption in this high-risk area.** Businesses' attitudes towards corruption in the EU shows that 34% of companies in Croatia (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 years<sup>91</sup>. 37% of companies perceive the level of independence of the public procurement review body (the State Commission for Supervision of Public Procurement Procedures-DKOM) as very or fairly good, which has significantly increased in comparison to 2025 (27%)<sup>92</sup>. The Single Market and Competitiveness Scoreboard on access to public procurement in Croatia reports 31% of single bids for 2025 (27% EU average). High-level cases, also involving members of Government, are pending before criminal courts<sup>93</sup>. On 16 May 2026, amendments to the Law on Public Procurement entered into force introducing measures to enhance transparency, efficiency and digitalisation, carrying the potential to reduce corruption risks and conflicts of interest at all stages of the procurement procedure<sup>94</sup>. Furthermore, the changes introduced aim to address the previously identified lack of legal protection<sup>95</sup> and provide an opportunity to address the lack of competence of the DKOM to review contracts in simplified procurement procedures below the national threshold, through which a large part of the national budget is spent<sup>96</sup>. Additionally, the amendments aim to address the risks of irregularities in the contract implementation phase<sup>97</sup> by introducing mechanisms for verifying contract execution and introducing the obligation to publish all contract amendments. The high level of

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<sup>88</sup> The State Attorney's Office decides on whether to prosecute campaign finance violations, however, it does not publicly disclose details of financial sanctions.

<sup>89</sup> See OSCE (2026), recommendation to explicitly regulate third-party campaigning.

<sup>90</sup> Candidates can finance their election campaigns by their own funds and through donations made by natural and legal persons, Law on the Financing of Political Activities, Election Campaigns and Referendums, creating risks of structural corruption where public funds may be diverted in exchange for political support. OECD (2025); OSCE (2024).

<sup>91</sup> Flash Eurobarometer 582 on Businesses' attitudes towards corruption and businesses' perceptions of the independence of national justice systems in the EU and selected enlargement countries (2026). This is 4 percentage points above the EU average.

<sup>92</sup> Figure 59, 2026 EU Justice Scoreboard.

<sup>93</sup> Country visit Croatia, USKOK and PNUSKOK.

<sup>94</sup> Country visit Croatia, Ministry of Justice, Administration and Digital Transformation. The amendments of the Ministry of Economy impose higher standards of preparation, stricter deadline management and enhanced procedural discipline for contracting authorities. As to economic operators and their legal advisers, cost assessment in appeal proceedings is proposed, among others.

<sup>95</sup> Economic operators have the possibility now to submit complaints through appropriate legal protection institutes.

<sup>96</sup> In 2025, the share of public procurement procedures reviewed by DKOM was launched remained low at 3.5% of all published procedures in 2025 (2.6% in 2024). Around 13% of the public spending is procured by simplified procedure without any control. The DKOM does not have the competence to review these procurements. DKOM (2026), additional written input.

<sup>97</sup> Such as approvals of non-compliant supplies/services. Such practices during the implementation phase are critical because they are frequently used to modify after the award the terms of a competitive tenders in favour of a contractor to increase costs or decrease the scope, often bypassing competitive rules. Country visit Croatia, DKOM.

administrative fees for companies to initiate reviews before DKOM were reported to be the main reason for the low number of reviewed contracts<sup>98</sup>. Following the appointment of new DKOM members by Parliament in July 2025, the three councils hearing appeals have been fully operational since late August 2025. DKOM transmitted two notifications to the State Attorney's Office in 2025. Overall, sectors vulnerable to corruption are reportedly the health, renewable energy, environment and construction sectors, creating uncertainty for businesses<sup>99</sup>. The new Law on Foreign Investment in force since 13 November 2025 mandates prior approval for third country investments and entities under third country control of sectors deemed critical, including integrity and criminal records checks, including corruption convictions of foreign investors<sup>100</sup>. In June 2025, Croatia was removed from the 'grey list' of jurisdictions under enhanced monitoring of the Financial Action Task Force (FATF)<sup>101</sup>, signalling that Croatia improved transparency and its capacity to investigate, prosecute and sanction the laundering of corruption proceeds, which may enhance investor confidence and access to capital markets.

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

**Amendments to the media law enlarged the regulatory mandate of the independent media regulator.** With a view to alignment with the European Media Freedom Act on 26 March 2026, a new law amending certain provisions of the media law entered into force, enlarging the Agency for Electronic Media (AEM) mandate to cover also print media and additional functions, such as assessing media market concentrations. This initiative is part of a broader effort to establish a unified regulatory framework, aimed at enhancing comprehensive media oversight. Croatia's media regulator has scored low risk by the Media Pluralism Monitor (MPM) as for its independence and effectiveness<sup>102</sup>, while human and financial resources are assessed by the media regulator as matching its responsibilities<sup>103</sup>. In view of the amendments, the Media Council – the main governing and regulatory body – will be tasked with overseeing the appointments of the management of public service bodies<sup>104</sup>. Stakeholders, however, have expressed some concerns over the indefinite re-election of the Media Council's members, and that election and dismissal processes are controlled by the parliamentary majority, with discussions focusing on term limits<sup>105</sup>. In arguing for strengthened safeguards for the Council, stakeholders pointed to its future role in issuing ordinances setting minimum criteria for the public procurement of programme production and broadcasting for media generally<sup>106</sup>.

**Discussions on public service media reform focus mainly on the model for electing management bodies.** These debates are part of broader legislative and governance

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<sup>98</sup> Country visit Croatia, DKOM and American Chamber of Commerce. The 2022 Rule of Law Report found that 'safeguards for the State Commission's independence, particularly regarding the appointment and discipline of the members of the State Commission, could be further improved'.

<sup>99</sup> Country visit Croatia, USKOK, PNUSKOK, State Audit Office and the American Chamber of Commerce.

<sup>100</sup> Law on Foreign Investment Screening. Obligated entities include companies, among others, in critical infrastructure, defence, technology.

<sup>101</sup> Croatian Government (2026b), written input, p. 23.

<sup>102</sup> Media Pluralism Monitor (2026), p. 14.

<sup>103</sup> Country visit Croatia, AEM.

<sup>104</sup> Media law of 6 March 2026; Country visit Croatia, HRT Management.

<sup>105</sup> Croatian Journalists' Association (2026), written input, p. 16. See also analyses in 2025 Rule of Law Report, Croatia, p. 12, and 2024 Rule of Law Report, Croatia, p. 21.

<sup>106</sup> Croatian Journalists' Association (2026), written input, p. 16.

reforms<sup>107</sup>. Moreover, some stakeholders have expressed concerns about current appointment procedures, particularly about potential political influence, notably highlighting possible influence on editorial decision-making by the management of the Croatian News Agency (HINA)<sup>108</sup>. The Media Pluralism Monitor noted medium-high risk of independence of public service media, pointing particularly to persistent structural vulnerabilities in governance and editorial practices despite a relatively comprehensive legal framework<sup>109</sup>. Anticipated legislative reforms to address these concerns for the Croatian Radio-Television (HRT) are expected to be presented by late 2026. There are no detailed plans reported for the reform of HINA<sup>110</sup>.

**There are ongoing concerns regarding the availability of stable financing for public service media.** While HINA and HRT have been funded based on licence fees for over three decades, new funding strategies are currently under consideration to enhance financial security in a context of falling licence fee revenues<sup>111</sup>. In 2025, HRT incurred an additional deficit of EUR 50 million, with EUR 22 million attributed to the enduring gap between licence fees collected and the costs associated with content production and distribution, as well as substantial incidental costs following staff reduction<sup>112</sup>, which have attracted some expressions of concern from stakeholders, including because of existing funding shortfall<sup>113</sup>. Since 2010, HRT has experienced significant financial challenges. The licence fee has remained at the same rate, resulting in declining revenues in real terms. The current funding model is generally viewed as outdated, prompting ongoing discussions about potential alternatives. Stakeholders have highlighted persistent issues with sustainability of financing of public service media through the licence fee system, noting that relying on annual state subsidies granted in addition by Government decision raises concerns about predictability, stability and independence from the political influence<sup>114</sup>.

**Adopted amendments expand the database of media ownership and financing to include print media, while stakeholders' concerns persist regarding the oversight of indirect ownership.** The centralised online media ownership and financing platform provides data on media entities and their owners, as recorded in official registers, along with information on revenues, funding methods and sources, and concessions held<sup>115</sup>. Stakeholders were generally positive about the database<sup>116</sup>. Moreover, the Media Pluralism Monitor assessed that transparency of media ownership has improved significantly following the introduction of the media ownership database, scoring low risk<sup>117</sup>. However, concerns were raised by some stakeholders regarding silent owners of media providers<sup>118</sup>, who are not required to be listed

<sup>107</sup> Country visit Croatia, HRT Management.

<sup>108</sup> Country visit Croatia, Croatian Journalists' Association.

<sup>109</sup> Media Pluralism Monitor (2026), p. 28.

<sup>110</sup> Country visit Croatia, HRT Management.

<sup>111</sup> Country visit Croatia, Ministry of Culture and HRT Management.

<sup>112</sup> Country visit Croatia, Ministry of Culture and HRT Management.

<sup>113</sup> Media Pluralism Monitor (2026), p. 29.

<sup>114</sup> Country visit Croatia, Croatian Journalists' Association. The Media Pluralism Monitor (2026), p. 28. The MPM 2026 flagged in addition some concerns regarding the effectiveness and evaluation of direct subsidies for public funding mechanisms, raising concerns that its monitoring focuses primarily on administrative compliance rather than the quality or pluralistic value of funded content.

<sup>115</sup> Croatian Government (2026b), written input, p. 23. A related milestone 27 (Setting up a system for fact-checking) in the Recovery and Resilience Plan for Croatia is part of the 10th payment request, hence it has not yet been assessed by the Commission.

<sup>116</sup> Country visit Croatia, Croatian Journalists' Association.

<sup>117</sup> Media Pluralism Monitor (2026), p. 17.

<sup>118</sup> Non-voting shareholders, as authorised by the Law on Companies, Chapter III, Articles 148 to 157.

in the register of beneficial ownership<sup>119</sup>. Stakeholders have also highlighted some practical shortcomings in the monitoring of advertising funding by state-owned enterprises<sup>120</sup>.

**A law revising the relevant framework for state advertising entered into force<sup>121</sup>.** Stakeholders continue to express concerns of perceived favouritism towards media outlets with government affiliations and the challenges with complying with reporting requirements, especially at local level<sup>122</sup>. The law, adopted with a view to alignment with the EMFA, entered into force on 26 March 2026. It has the objective of establishing a legal framework and oversight mechanisms to ensure the fair and transparent allocation of state advertising<sup>123</sup>. However, further specification of the framework is required through more specific and necessary guidelines to be issued by the media regulator to make this framework operational<sup>124</sup>. The law retained the existing legal requirement that 15% of public advertising budgets must be allocated to regional and local media. Therefore, some progress has been made on the implementation of the recommendation.

**The financial and governance dependence of local radio and media publishers on local government is linked to concerns about their editorial independence.** The Ministry of Culture noted that many regional media publishers and commercial radio operators receive funding from municipal bodies, and this can put at risk their independence<sup>125</sup>. Similarly, reports indicate that political influence in local media is exerted through supplementary funding, advertising revenue and ownership, with some outlets under local government ownership<sup>126</sup>. While the risk is assessed as medium-low, the MPM highlighted that local media markets, particularly regional television and radio, are rather vulnerable to political capture and ownership concentration<sup>127</sup>. In particular, the MPM flagged that many local online outlets rely heavily on reproducing official information from municipal authorities, which raises concerns about editorial diversity and independence<sup>128</sup>. Furthermore, local government officials combine their public functions with membership in the management bodies of local commercial TV and radio stations<sup>129</sup>. Stakeholders also report the closure or marginalisation of several national and local media outlets, including the withdrawal of funding, which adversely affects the working conditions of many media professionals<sup>130</sup>. The Ministry of Culture suggested that alternative funding sources would be considered, such as a

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<sup>119</sup> Croatian Journalists' Association, written input, p. 20.

<sup>120</sup> European Federation of Journalists (2026), written input, p. 18, reporting that state-owned enterprises are estimated to spend substantially more on advertising than other public institutions, yet such expenditures are often neither adequately monitored nor transparently reported; Media Pluralism Monitor (2026), p. 28. The Media Pluralism Monitor also noted that in 2025 significant funds were channelled through marketing agencies without public tenders.

<sup>121</sup> The 2025 Rule of Law Report recommended Croatia to "step up efforts to strengthen the legal framework and oversight mechanisms to ensure a fair and transparent allocation of state advertising at national, regional and local level, including the public tender procedure". No progress was previously assessed on this recommendation in 2025, 2024 and 2023.

<sup>122</sup> Country visit Croatia, Croatian Journalists' Association.

<sup>123</sup> Law on the implementation of the Regulation establishing a common framework for media services in the internal market and amending Directive 2010/13/EU.

<sup>124</sup> Country visit Croatia, AEM.

<sup>125</sup> Country visit Croatia, Ministry of Culture.

<sup>126</sup> Country visit Croatia, AEM.

<sup>127</sup> Media Pluralism Monitor (2026), p. 25.

<sup>128</sup> Media Pluralism Monitor (2026), p. 34.

<sup>129</sup> Country visit Croatia, AEM.

<sup>130</sup> Croatian Journalists' Association (2026), written input, p. 15.

dedicated local fund, and is working on plans to reform the Media Pluralism Fund to address current challenges and support economically non-viable content creation<sup>131</sup>.

**Trends in access to public information remain unchanged with some delays or partial information being provided, while work on a new access-to-information law is ongoing.**

The Protection of the right to information in Croatia scores low risk, as assessed by the MPM<sup>132</sup>. However, some practical challenges continue in accessing information, such as delays, the broad application of exceptions and obstacles related to the classification of information<sup>133</sup>. In 2025, a Government-established working group analysed expert recommendations to amend the Law on the Right of Access to Information, resulting in a draft proposal to enhance elements such as proactive publication, public consultation, information officers and the resolution of information access requests<sup>134</sup>. After public consultation, which is planned for the end of 2026/beginning of 2027, the draft will be submitted to the Government. In 2025, the Information Commissioner actively promoted access to information and conducted 39 training sessions on the right of access to information, including specialist sessions for journalists and other media professionals.

**Efforts to improve the safety of journalists continued, as journalists called for further measures to strengthen and protect their profession.** The journalist community described continued challenges due to lacking self-regulatory measures to bolster the status of journalists<sup>135</sup>. In response to these challenges, the Government adopted the Action Plan for the Development of Culture and Media on 6 November 2025, with objectives set until 2027<sup>136</sup>. The Ministry of Culture is also exploring options for a mandatory register for journalists, influencers and content creators to support specific protective actions, though this initiative also elicited concerns and reservations from journalist representatives questioning the potential negative impact on journalistic independence<sup>137</sup>. Regarding the safety of journalists, in the reporting period, the Council of Europe Platform to promote the protection and safety of journalists recorded seven new alerts concerning Croatia. Five of the alerts concerned harassment and intimidation of journalists, while two other incidents were recorded concerning attacks on the physical safety and integrity of journalist<sup>138</sup>. Moreover, Mapping Media Freedom has noted 22 new alerts since the publication of the last report. Sixteen of them concerned verbal attacks, including threats or harassment; five concerned interferences, with the most common example being obstruction of journalistic activity; while the remaining alerts relate to physical assaults, attacks on property, and legal incidents<sup>139</sup>. According to data provided by the Ministry of the Interior, in 2025, 19 incidents involving 23 criminal offences against journalists and other media professionals were recorded. The

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<sup>131</sup> Country visit Croatia, Ministry of Culture.

<sup>132</sup> Media Pluralism Monitor (2026), p. 12.

<sup>133</sup> European Federation of Journalists (2026), written input, p. 21.

<sup>134</sup> Croatian Government (2026b), written input, p. 25. A related milestone 243 (Evaluation of the effects of the Law on the right of access to information) in the Recovery and Resilience Plan for Croatia was considered fulfilled in 2024.

<sup>135</sup> Croatian Journalists' Association, written input, p. 28.

<sup>136</sup> Country visit Croatia, Ministry of Culture. The plan focuses on improving the status of the journalistic profession and the media sector while encouraging pluralism. It lists activities to strengthen the media statute as a self-regulatory act at the editorial level, representing an internal agreement between the editorial board and the publisher on mechanisms to protect editorial and professional journalistic autonomy.

<sup>137</sup> Country visit Croatia, Croatian Journalists' Association, the Media Pluralism Monitor (2026), p. 21.

<sup>138</sup> Council of Europe Platform to promote the protection of journalism and safety of journalists (2026). The Government has replied to four such alerts, while has not replied to two alerts (there were classified as non-state threat). In case of one of the alerts the reply is expected by July 2026.

<sup>139</sup> European Centre for Press and Media Freedom (2026).

authorities reported that, in all cases, cooperation took place under the Cooperation Agreement concluded in September 2023 between the Ministry of the Interior and the Croatian Journalists' Association and the Trade Union of Croatian Journalists<sup>140</sup>. The MPM underlines the medium-high risk as regards the journalistic profession, standards and protection<sup>141</sup>. Against this background, the Government in 2025 organised training sessions within the largest media outlets, involving over 180 sector professionals, to stimulate and maintain a secure environment<sup>142</sup>, while the workshops continued in 2026<sup>143</sup>. The Protocol on the conduct of police, journalists and other media professionals during public gatherings continues to serve as a valuable tool for addressing safety concerns<sup>144</sup>.

**There was some further progress on the recommendation to address the issue of strategic lawsuits against public participation targeting journalists, as the anti-SLAPP law entered into force<sup>145</sup>.** As mentioned in previous Rule of Law Reports and stated by stakeholders, the strategic lawsuits against public participation are an issue both in numbers and seriousness<sup>146</sup>. The analysis of the Government, which is based on a different methodology, presented a lower number of cases<sup>147</sup>. On 19 June 2026, Parliament adopted the Law on the Protection of Persons Involved in Public Activities, designed to transpose the Anti-SLAPP Directive, and it entered into force on 7 July 2026<sup>148</sup>. The consultations on this draft law were prepared through an inter-institutional framework involving relevant government ministries, the judiciary, and media stakeholders, though stakeholders mentioned shortcomings in the inclusiveness of the consultation process<sup>149</sup>. On substance, the scope covered includes both domestic and cross-border civil law cases, excluding however criminal cases<sup>150</sup>. This is of concern for stakeholders, who point out that most of SLAPP cases faced by journalists are launched on grounds of criminal defamation or insult<sup>151</sup>. CSO

<sup>140</sup> Croatian Government (2026b), additional written input, p. 24.

<sup>141</sup> The Media Pluralism Monitor (2026), p. 13.

<sup>142</sup> In 2025, four-day training sessions (were carried out in journalistic newsrooms of Croatia's largest media outlets, directly involving more than 180 journalists; Croatian Government (2026b), written input, p. 24. In 2026 one-day workshops continued to be implemented at the local level, including training activities for police officers, journalists, and other media professionals, Croatian Government (2026a), additional written input, p. 25.

<sup>143</sup> Croatian Government (2026b), additional written input, p. 27.

<sup>144</sup> In 2025, police applied the Protocol in one case; Croatian Government (2026), written input, p. 24.

<sup>145</sup> The 2025 Rule of Law Report recommended Croatia to "continue efforts to address the issue of strategic lawsuits against public participation targeted at journalists, including by reviewing the legal provisions on defamation and encouraging wider use of procedural rules that allow dismissing groundless lawsuits, taking into account the European standards on the protection of journalists". Some progress was previously assessed on this recommendation in 2025, 2024 and 2023.

<sup>146</sup> The 2025 Report reported that a survey conducted by the Croatian Journalists' Association had counted that as of May 2025 at least 696 active lawsuits against journalists and media outlets were recorded, 2025 Rule of Law Report, Croatia, pp. 15-16; Country visit Croatia, Ombudsperson, Croatian Journalists' Association, Trade Union of Journalists and Centre for Democracy and Law Miko Tripalo.

<sup>147</sup> The Ministry of Justice, Public Administration and Digital Transformation's analysis identified 32 cases (25 civil and 7 criminal) that in their assessment "could potentially qualify as SLAPP". Moreover, as reported by the Government, through an analysis conducted via the eSpis court management system, they identified 20 civil court cases in 2025 that could potentially qualify as SLAPP proceedings, of which 9 were concluded with final judgments, Croatian Government (2026b), additional written input, p. 28.

<sup>148</sup> <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=32524>

<sup>149</sup> Only one CSO representative was included in the legislative working group after public pressure.

<sup>150</sup> While the anti-SLAPP Directive does not cover claims brought under criminal procedure, the anti-SLAPP Recommendation called on Member States to take a number of steps to provide protections in this regard.

<sup>151</sup> Country visit Croatia, Croatian Journalists' Association and Ombudsperson.

representatives raised that SLAPP cases often remain unreported<sup>152</sup>. Considering that legislative amendments entered into force, there was some further progress on the implementation of the recommendation.

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

**Local and regional authorities started publishing draft regulations on the public consultation portal, and the regularity of impact assessments and evaluations of laws increased.** Application of SME tests and the administrative burden reduction on businesses continued<sup>153</sup>. Local and regional self-government units started using the e-Consultations portal for consultations on the draft regulations under their competence in 2025<sup>154</sup>. There were 809 consultations conducted on the portal at national level in 2025<sup>155</sup>. The length of consultations again improved. The share of comments received that remained unanswered slightly increased<sup>156</sup>. The number of regulatory impact assessments at national level further increased to nearly half of all 2025 proposals<sup>157</sup>. In August 2025, the Government's Legislation Office completed the Technical Support Instrument Project 'Strengthening the Implementation of Ex-post Evaluation in Croatia'. In this two-year project, a total of five ex-post evaluations were carried out<sup>158</sup>. In October 2025, an additional regulatory evaluation was launched by a ministerial decision<sup>159</sup>.

**More than half of the companies surveyed in Croatia express confidence in the effectiveness of investment protection.** 57% of companies are very or fairly confident that investments are protected by law and courts, a figure which has increased in comparison with 2025 (53%)<sup>160</sup>. As regards authorities relevant for economic operators, 35% perceive the level of independence of the national competition authority (The Croatian Competition Agency) as very or fairly good, a figure which has slightly increased in comparison with 2025 (32%)<sup>161</sup>. The High Administrative Court has jurisdiction in several business-related cases, including in cases related to public procurement, public concessions, public contracts

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<sup>152</sup> European Federation of Journalists (2026), written input, p. 22. As reported by the Information Commission general trends in appeal cases remain comparable with previous years.

<sup>153</sup> Croatia applies the SME test at both legislative and secondary legislation levels, with the objective of preventing the introduction of new costs and administrative burdens for entrepreneurs.

<sup>154</sup> Until January 2026, there were 27 such consultations at local level. Country visit Croatia, Government's Legislation Office.

<sup>155</sup> There were 896 consultations in 2024 and 1 028 in 2022. Country visit Croatia, Government's Legislation Office.

<sup>156</sup> The length of consultations was 24 days on average (22 in 2024). The share of unanswered comments was 15% (13% in 2024). In 2025, a total of 6 911 individuals and legal entities participated (4 735 in 2024). Croatian Government (2026a).

<sup>157</sup> In 2025, regulatory impact assessments were conducted for 85 draft laws, representing 46% of all proposals. Croatian Government (2026b), written input, p. 16.

<sup>158</sup> In the areas of state aid for research and development projects, sustainability of pensions, agricultural land consolidation, decarbonisation of buildings and renewable energy sources. Croatian Government (2026b), written input, p. 16.

<sup>159</sup> It examined how the Law on the Management and Maintenance of Buildings is being implemented. In the National School for Public Administration, the Government's Legislation Office regularly holds workshops in the field of better regulation policy instruments. Croatian Government (2026b), written input, p. 16.

<sup>160</sup> Figures 52 and 53, 2026 EU Justice Scoreboard. 22% and 20% of the surveyed investors respectively perceive concerns about quality, efficiency or independence of justice and frequent changes in legislation or concerns about the quality of the law-making process as a reason for the lack of confidence in investment protection.

<sup>161</sup> Figure 60, 2026 EU Justice Scoreboard.

and economic regulation. A number of judicial mechanisms to improve efficiency are available in these cases, including the possibility to apply for interim measures<sup>162</sup>.

**On 1 January 2026, Croatia had 33 leading judgments of the European Court of Human Rights pending implementation, an increase of three compared to the previous year<sup>163</sup>.** At that time, Croatia's rate of leading judgments from the past 10 years that had been implemented was at 63% (compared to 68% in 2025; 37% remained pending), and the average time that the judgments had been pending implementation was two years and five months (compared to two years and three months in 2025)<sup>164</sup>. The oldest leading judgment, pending implementation for more than nine years concerns violations of the right to a fair trial<sup>165</sup>. As regards the respect of payment deadlines, on 31 December 2025 there were seven cases in total awaiting confirmation of payments (compared to 12 in 2024)<sup>166</sup>. On 17 June 2026, the number of leading judgments pending implementation had decreased to 30<sup>167</sup>.

**Government authorities further improved the implementation of recommendations by the Ombudsperson.** The Ombudsperson fulfils the role of the National Human Rights Institution and is accredited with A-status<sup>168</sup>. In 2025, the Ombudsperson's human resources increased, and its financial resources increased significantly<sup>169</sup>. The Government's Office for Human Rights and Minority Rights continued with its practice of collecting information from all relevant authorities about the implementation of the recommendations from the last Ombudsperson's report. In 2025, according to the Ombudsperson, the implementation of recommendations again improved, as around 65.2% of all recommendations given in 2024 have either been already implemented or are in the process of being implemented (61% of those issued in 2023 were implemented in 2024)<sup>170</sup>. According to the Government, the analysis has shown that 72% of recommendations issued in 2024 have been implemented, are being implemented, or are in the implementation plan (in comparison to 73.3% of those issued in 2023). As regards access to information, the Ombudsperson did not report any significant challenges. As previously reported, the Parliament has still not discussed the recent annual reports of the Ombudsperson, which the Ombudsperson characterised as an obstacle to its effective work<sup>171</sup>. In 2025, the number of complaints from citizens received by the Ombudsperson increased by 21% compared to 2024<sup>172</sup>.

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<sup>162</sup> 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.

<sup>163</sup> For an explanation of the supervision process, see the [website](#) of the Council of Europe.

<sup>164</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 2026. EIN (2026), written input, p. 2.

<sup>165</sup> Judgment of the ECtHR, 7183/11, *Letinčić v. Croatia*, pending implementation since 2016.

<sup>166</sup> Council of Europe (2026), p. 162.

<sup>167</sup> Data according to the online database of the Council of Europe (HUDOC).

<sup>168</sup> According to the Principles relating to the Status of National Human Rights Institutions (The Paris Principles).

<sup>169</sup> The number of employees increased to 65 (62 in 2024) and financial resources increased significantly to EUR 3.3 million (EUR 1.5 million in 2024). Croatian Government (2026b), written input, pp. 9-10.

<sup>170</sup> Ombudsperson (2026), pp. 8-9.

<sup>171</sup> The Ombudsperson's report for 2022 was discussed in Parliament only in 2025; in May 2026, the Ombudsperson's reports for 2023 and 2024 were awaiting debate in the plenary of Parliament, with the Government still to adopt its opinions on them. Ombudsperson (2026), p. 9. Ombudsperson (2025) and Liberties (2026), pp. 176-177.

<sup>172</sup> According to the Ombudsperson this is the highest number of complaints in the last 30 years. In 2025, Ombudsperson opened 4 491 new cases, with most in the area of health (525). Ombudsperson (2026), p. 2.

**The opportunities for multiannual funding of civil society organisations expanded.** The civic space in Croatia is considered by Civicus to be ‘narrowed’<sup>173</sup>. As reported in 2025, the Government Working Group completed the technical drafting process of its National Plan for Creating an Enabling Environment, and the internal governmental consultation is pending<sup>174</sup>. Civil society organisations (CSOs) stated that delays in the adoption of the national plan present a challenge for the predictability of the operating space for civil society<sup>175</sup>. The trend in funding moving from short-term support towards multiannual systematic and continuous financing, welcomed by CSOs<sup>176</sup>, was maintained with several multi-year financing projects, and the Government indicated its plans to expand this approach to all funding in future<sup>177</sup>. However, CSOs also raised insufficient funding as a challenge<sup>178</sup>.

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<sup>173</sup> The score is 71/100. Ratings by Civicus are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed.

<sup>174</sup> Country visit Croatia, Government’s Office for Cooperation with the NGOs. 2025 Rule of Law Report Croatia, p. 18.

<sup>175</sup> Country visit Croatia, Human Rights House.

<sup>176</sup> Country visit Croatia, Human Rights House and Centre for Peace Studies.

<sup>177</sup> Country visit Croatia, Government’s Office for Cooperation with the NGOs.

<sup>178</sup> Liberties (2026), pp. 142, 175, and Country visit Croatia, Centre for Peace Studies.

## 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](https://commission.europa.eu/publications/2026-rule-law-report-targeted-stakeholder-consultation_en).*

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

The Commission services held virtual meetings in January 2026 with:

- Agency for Electronic Media
- American Chamber of Commerce - Croatia
- Association of Judges (Judge Damir Kontrec)
- Centre for Democracy and Law Miko Tripalo (Prof. Alan Uzelac)
- Centre for Peace Studies
- Commission for the Resolution of Conflicts of Interest
- Constitutional Court
- Croatian Journalists' Association
- Croatian Newspaper Publishers' Association
- Crosol - Croatian Platform for International Citizen Solidarity
- DKolektiv
- GONG
- Government's Legislation Office
- Government's Office for Cooperation with NGOs
- Government's Office for Human Rights and Rights of National Minorities
- HRT – Croatian Radio and Television (Director General Robert Šveb)
- Human Rights House
- Ministry of Culture and Media
- Ministry of Justice, Public Administration and Digital Transformation
- Ministry of the Interior
- Office of the Information Commissioner
- Office of the Ombudsperson
- PNUSKOK - specialised anti-corruption police
- State Attorney's Council
- State Attorney's Office (including State Attorney General and USKOK-specialised anti-corruption prosecution)
- State Audit Office
- State Commission for Supervision of Public Procurement Procedures
- Supreme Court (Vice-President Gordana Jalšovečki)
- Trade Union of Croatian Journalists

\* 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