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## COMMISSION STAFF WORKING DOCUMENT

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

#### *Accompanying the document*

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

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

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## **ABSTRACT**

In Croatia, following structural efforts to address remuneration, legislative amendments introduced objective criteria for adjusting salaries of judges and state attorneys. Efforts continue to maintain and improve the integrity of judges and state attorneys. The amendments to the Law on the State Attorney's Office were finalised in Government to remove the legal basis for periodic security checks on all state attorneys. Legal changes are envisaged to ensure that the system of registration judges is compatible with EU law in line with the requirements set by the Court of Justice. The State Judicial Council called on Court Presidents to respect the rules on random allocation when selecting court cases to be assigned to new judges. Electronic communication systems between courts and users saw increased use, further closing the digitalisation gap. The level of perceived judicial independence has continued to increase, although it remains very low. The total backlog decreased, while the length of trials in most cases increased.

The implementation of the first Action Plan for 2022-2024 under the Anti-Corruption Strategy ended and the evaluation is ongoing. Authorities are developing a track record of investigations, prosecutions and convictions of corruption, including in high-level cases, and the revision of the Criminal Procedure Code and the Law on the Office for the Suppression of Corruption and Organised Crime for the efficiency of investigation and prosecution of corruption offences is expected in the first quarter of 2026. The Commission for the Resolution of Conflict of Interest continues to face difficulties verifying asset declarations, as its resources are scarce and advanced digital tools are not yet fully operational. Codes of ethics are in place at all levels of the administration and Government. The implementation of the new law on lobbying is on track, while the public is not directly informed about meetings between lobbyists and officials. The State Audit Office reported no substantial violations of the rules on political party financing. The Government is raising awareness on the harmfulness of corruption and the importance of whistleblower legislation. Measures were taken to address corruption in public procurement which remains a high-risk area of corruption.

The independently financed Agency for Electronic Media (AEM) remains important for media oversight and promoting pluralism. The Government plans to update the Law on Croatian Radio-Television and the Law on Electronic Media. Croatia's public broadcaster is undertaking significant reforms to address financial and governance challenges. No steps have been taken yet to strengthen the legal framework and oversight mechanisms to ensure a fair and transparent allocation of state advertising at national, regional and local level. A new centralised media ownership and financing database was launched on AEM's website. While journalists primarily rely on the Law on Media to access public information due to its simplified procedure and shorter deadlines, the law lacks a clearly defined response timeframe, without oversight by an independent monitoring body. Journalists still face a number of challenges although efforts to improve their safety are ongoing. SLAPPs continue to be an area of concern and so far, some steps are being taken to address them.

Impact assessments and evaluations of laws expanded, and the portal for public consultations was introduced to local and regional levels. Significant steps were made to improve follow-up to the People's Ombudsperson's recommendations and on access to information. The shift toward multiannual funding of civil society organisations continued, while the new National Plan for Creating an Enabling Environment is under preparation.

## **RECOMMENDATIONS**

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

- Some progress on revising 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.
- No progress yet on stepping 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.
- Some progress on the recommendation 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.
- Significant progress on further improving the follow-up to recommendations and ensuring a more systematic response to information requests of the Ombudsperson.

On this basis, and 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, it is recommended to Croatia to:

- Take measures to further improve the efficiency of justice, particularly as regards the length of proceedings in litigious commercial and civil cases.
- 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.
- 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.
- 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.

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

### Independence

**The level of perceived judicial independence has continued to increase in Croatia, although it remains very low among both the general public and companies.** Overall, 28% of the general population and companies perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2025<sup>2</sup>. Among the general public, this figure has increased in comparison with 2024 (23%) and has significantly increased in comparison with 2021 (17%). The perceived judicial independence among companies remains at the same level as in 2024 (28%) and has significantly increased in comparison with 2021 (16%). 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 interference or pressure from economic or other specific interests<sup>3</sup>.

**Amendments to the Law on the State Attorney’s Office were finalised in Government to remove the legal basis for periodic security checks on all state attorneys.** Following the recommendation in the 2022 Rule of Law Report<sup>4</sup>, security checks on judges had been removed by way of a Constitutional Court decision and the Government approved on 27 June 2025 draft amendments to the Law on the State Attorney’s Office to remove the legal basis for periodic security checks on all state attorneys. In the meantime, no security checks on state attorneys had been conducted based on previous provisions.

**Efforts continue to maintain and improve the integrity of judges and state attorneys.** In 2024, efforts continued to react to alleged misconduct and criminal acts of judges and state attorneys. The State Judicial Council received 47 requests to initiate criminal proceedings regarding judges and, at the request of competent authorities, started nine disciplinary proceedings in relation to judges, which also concluded with three dismissals<sup>5</sup>. In addition, the State Judicial Council verified external activities of judges, rejecting activities no longer

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

<sup>2</sup> Figures 50 and 52, 2025 EU Justice Scoreboard and Figures 49 and 51, 2023 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

<sup>3</sup> More detailed surveys to identify the underlying reasons of different stakeholders for the continuously low level of perceived judicial independence are not available. The last comprehensive survey of court users and professionals on the accessibility and quality of the court services was in 2015. See Figure 45, 2017 EU Justice Scoreboard and Figure 41, 2024 EU Justice Scoreboard showing that between 2016 and 2023, no surveys were conducted.

<sup>4</sup> The 2022 Rule of Law Report had recommended Croatia to ‘reconsider the newly introduced periodic security checks conducted by the National Security Agency on all judges and state attorneys by ensuring their integrity based on other existing mechanisms, taking into account European standards on judicial independence and autonomy of prosecutors and the opinion of the Venice Commission’.

<sup>5</sup> Out of these, in 37 cases the requests were denied after the Council verified that prosecution service has no open investigations (five cases were still ongoing in February 2025). In March 2025, the State Judicial Council kept seven judges under suspension due to ongoing criminal proceedings, and three due to ongoing disciplinary proceedings. The number of initiated disciplinary proceedings has been decreasing (23 in 2021). In 2024, the State Judicial Council issued seven disciplinary sanctions (five in 2023): three fines, one reprimand, and three dismissals. Croatian Government (2025), written input, p. 2, and country visit Croatia, State Judicial Council.

authorised by the amended Law on Courts<sup>6</sup>. In 2024, the State Attorney's Council received no further requests from the competent authorities to start disciplinary proceedings regarding state attorneys. With the help of the electronic registers and dedicated human resources<sup>7</sup>, the State Judicial Council and the State Attorney's Council checked all annual updates of asset declarations of judges and state attorneys, and only a few minor irregularities were identified.

**The State Judicial Council called on Court Presidents to respect the rules on random allocation when selecting court cases to be assigned to new judges.** In February 2025, the State Judicial Council alerted Court Presidents that rules on random allocation should also be respected when choosing which of the ongoing cases should be assigned to new judges arriving to courts<sup>8</sup>. In some courts, the judges could select themselves which of their open cases would be re-allocated to the new judges. Having made clear that the selection of ongoing cases should be random, the State Judicial Council announced that it will ask the Judicial Inspection to monitor whether the problematic practices continue.

**Legal changes are envisaged to ensure that the system of registration judges is compatible with EU law in line with the requirements set by the Court of Justice.** In October 2024, the Ministry of Justice established a working group to address the requirements resulting from the judgment of the Court of Justice of the European Union as regards the practice of registration judges<sup>9</sup>. The working group is considering amendments to the Law on Courts, Code of Criminal Procedure and the Code of Civil Procedure, which would change the role of registration judges and include increased use of the expanded panels of judges in decisions related to consistency of case law<sup>10</sup>.

## Quality

**Training of judges and court staff aims to improve communication about the work of the judiciary in an effort to foster trust.** In September 2023, the Supreme Court adopted 'Guidelines for communication of the judiciary with the public'. These Guidelines set out the goal of timely, accurate and transparent communication about the content and meaning of decisions for which there is public interest. Drawing on those Guidelines, the Judicial Academy conducted several training courses addressed primarily to the spokespersons and information officers at the courts to support them to communicate more effectively to the public, manage public relations especially in high-profile cases and use different communication channels to share information<sup>11</sup>.

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<sup>6</sup> In 2024, the State Judicial Council received 36 requests from judges regarding external activities, approving 29 and rejecting five relating to membership in disciplinary bodies of professional organisations, while two requests were not necessary as law allowed those activities. Country visit Croatia, State Judicial Council.

<sup>7</sup> Improving the IT tools and resources of both Councils by the beginning of 2022 was a milestone under the Recovery and Resilience Plan, which Croatia successfully fulfilled. 2024 Rule of Law Report, Croatia, p. 5.

<sup>8</sup> Country visit Croatia, Centre for Democracy and Law Miko Tripalo and State Judicial Council.

<sup>9</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 registration judges, when finding a judgment inconsistent with case law or the 'legal position' previously accepted at that court, may 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; 2024 Rule of Law Report, Croatia, p. 7.

<sup>10</sup> Country visit Croatia, Ministry of Justice, Public Administration and Digital Transformation.

<sup>11</sup> Country visit Croatia, Supreme Court.



**Objective criteria were introduced in law for updating remuneration of judges and state attorneys.** Apart from the important structural efforts made in the course of 2023 and 2024 to address remuneration in the judiciary<sup>12</sup>, legislation was expected to define objective criteria for adjusting salaries of judges and state attorneys. Following discussions with judicial representatives in a Government Working Group, on 21 February 2025, Parliament adopted an amendment to the Law on remuneration and other material rights of judicial officials. The amendment provides that the salary base for judges and state attorneys is the same as the one for public officials. This means that any change of salary base, for example an increase negotiated by trade unions for public officials due to inflation, will apply automatically also to judges and state attorneys after adjustment of public officials' salary base.

**Electronic communication systems between courts and users saw increased use, further closing the digitalisation gap in the justice system.** The digitalisation of the justice system has seen additional improvements in many areas<sup>13</sup>. The 'e-Communication' system, which was in 2024 connected to the e-Citizens and the e-Authorisation systems (for legal persons) to allow receiving court documents via secure mailbox, was upgraded with new functionalities<sup>14</sup>. In 2024, the overall use of the 'e-Communication' system<sup>15</sup> further increased, mostly among the professional users and companies<sup>16</sup>. The implementation of the Recovery and Resilience Plan continues and includes several milestones, targets and investments related to the digitalisation of justice<sup>17</sup>. For example, in November 2024, virtual assistants were launched for the land registry to assist users with simple tasks, and extension to other justice services is planned<sup>18</sup>. Furthermore, to increase the publication of first and second instance court judgments<sup>19</sup>, an IT solution for automatic and semi-automatic anonymisation of all court decisions (using artificial intelligence) was connected to the publication portal. Amendments to the Law on Courts and the Ordinance on the Methods of Anonymisation, Publication and Search of Anonymised Court Decisions since January 2025

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<sup>12</sup> The 2023 Rule of Law Report recommended Croatia to 'continue structural efforts to address the remuneration of judges, state attorneys and judicial staff, taking into account European standards on resources and remuneration for the justice system'. In 2024, the Rule of Law Report found that significant progress was achieved on this recommendation.

<sup>13</sup> Figures 40-48, 2025 EU Justice Scoreboard. The electronic tools incrementally improved in all areas except for use of digital technology by courts and prosecution service (Figure 42), the electronic communication in prosecution service (Figure 44) and the online access to published judgments (Figure 47).

<sup>14</sup> For example, with case identifiers and search functions. Croatian Government (2025), written input, pp. 5-6.

<sup>15</sup> Amendments are planned to be submitted to Parliament in third quarter of 2025 which would allow for integrating misdemeanor cases (before Municipal Courts), which are the last category of cases not yet included into the e-Communication system.

<sup>16</sup> In 2024, the total volume of incoming documents arriving to courts electronically increased to nearly 1.6 million, with largest increases among companies and legal professionals. For example, before commercial, municipal and administrative courts, the lawyers submitted 53-67% of their documents electronically. Outgoing electronic communication from courts to court parties and legal professionals remained stable around at 3.4 million documents, with lawyers, companies and state authorities among the largest recipients. Country visit Croatia, Ministry of Justice, Public Administration and Digital Transformation.

<sup>17</sup> The fourth payment request was disbursed in April 2024 (EUR 162.5 million net amount in grants) and included the satisfactory fulfilment of milestone 218 (Adoption of amendments to the legislative framework in the area of justice with the new non-contentious Procedure Act). The fifth payment request was submitted in April 2024 and disbursed in July 2024 (EUR 555.7 million in grants and EUR 266 million loans, both net amounts) and included the satisfactory fulfilment of milestone 220 (New Framework Benchmarks for the work of judges adopted and an active judicial case management tool introduced).

<sup>18</sup> Croatian Government (2025), written input, p. 6.

<sup>19</sup> Figure 47, 2025 EU Justice Scoreboard.

introduced the obligation to publish all court decisions on a special website with prior anonymisation, to ensure compliance with the rules on the protection of personal data<sup>20</sup>.

## Efficiency

**The total backlog decreased while the length of trials in most cases increased.** According to the 2025 EU Justice Scoreboard, backlogs and length of proceedings remain a serious concern, particularly in litigious civil and commercial cases, where backlog was, by the end of 2023, still the largest in the EU<sup>21</sup>. By the end of 2024, the total number of pending cases decreased by more than 6% compared to end 2023, particularly before municipal courts receiving the bulk of the cases (-8%), High Commercial Court (-6%), the High Misdemeanour Court (-7%) and the Supreme Court (-26%). In several other courts, the backlog increased, e.g. before county courts (+13%), administrative courts (+18), the High Administrative Court (+7%) and the High Criminal Court (23%)<sup>22</sup>. Furthermore, the total number of oldest pending cases (10 years and older) slightly increased (by nearly 2%)<sup>23</sup>. Despite improvements in some types of cases, length of proceedings, in most cases, increased, which remains a serious concern. In 2024, the average length of proceedings in the first instance courts remained among the longest in the EU with 1 147 days in litigious commercial cases (1 334 days in 2023) and 797 days in litigious civil cases (764 in 2023)<sup>24</sup>. However, the average length of proceedings further decreased in first instance criminal cases before municipal courts (752 days, down from 776 days in 2023) and before county courts (779 days, down from 808 days in 2023), with average length for the whole of 2024 of 525 days for all types of first instance court cases. In more narrow categories, in 2023, the average length of proceedings before first instance courts decreased in bribery cases (478 days, 531 days in 2022), while it increased to 771 days in money laundering cases (597 in 2022) – both remaining among the longest in the EU<sup>25</sup>.

## 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 2024 Corruption Perceptions Index by Transparency International, Croatia scores 47/100, ranks 23<sup>rd</sup> in the European Union and 63<sup>th</sup> globally<sup>26</sup>.

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<sup>20</sup> The Recovery and Resilience Plan for Croatia includes target 226 which states: ‘All new first and second instance court decisions ending proceedings are anonymised and published on the portal.’ The target is part of seventh payment request, hence it has not yet been assessed by the Commission.

<sup>21</sup> The data for 2023 continue to show particular challenges in litigious civil and commercial cases, and all non-criminal cases (Figures 5, 12, 13 of the 2025 EU Justice Scoreboard), although, similarly to 2022, the positive sign is that the clearance rate in litigious civil and commercial cases remained among the highest in the EU (Figure 11, 2025 EU Justice Scoreboard).

<sup>22</sup> Supreme Court (2025), pp. 29-30.

<sup>23</sup> 7 864 cases at the end of 2024, compared to 7 725 cases at the end of 2023, mostly at Municipal courts. Supreme Court (2025), pp. 78-79.

<sup>24</sup> This brings the average lengths slightly below the 2022 level, when it was 1 187 days. Country visit Croatia, Ministry of Justice, Public Administration and Digital Transformation.

<sup>25</sup> Figures 21 and 22, 2025 EU Justice Scoreboard.

<sup>26</sup> Transparency International (2025), Corruption Perceptions Index 2024. 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).

This perception remained relatively stable<sup>27</sup> over the past five years. The 2025 Special Eurobarometer on Corruption shows that 92% of respondents consider corruption to be widespread in their country (EU average 69%) and 61% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 90% of companies consider that corruption is widespread (EU average 63%) and 60% consider that corruption is a problem when doing business (EU average 35%). Furthermore, 40% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 36%), while 16% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 33%)<sup>28</sup>.

**The implementation of the first Action Plan for 2022-2024 under the Anti-Corruption Strategy ended and the evaluation is ongoing.** In August 2024, the Government adopted the Report on the implementation of the Action Plan 2022-2024. Generally, the implementation is on track with 79% of measures implemented and 8% partially implemented. Implemented activities include, among others, the adoption of the Lobbying act<sup>29</sup>. The second Action Plan for 2025-2027 was adopted in May 2025 and announced, amongst others, amendments to laws on the right of access to information and whistleblower protection, as well as measures to prevent corruption in local and regional self-government units<sup>30</sup>.

**Authorities are developing a track record of investigations, prosecutions and convictions of corruption, including in high-level cases**<sup>31</sup>. The specialised anti-corruption police (PNUSKOK) and prosecution (USKOK) continued to report that their cooperation works well. In 2024, EPPO investigated 22 corruption offences in Croatia. The cooperation with EPPO faced challenges due to a conflict of competence between national prosecutors and the EPPO in one prominent case<sup>32</sup>. As demonstrated by the data, in 2024, 601 corruption offences were reported by PNUSKOK to the USKOK (down from 747 in 2023)<sup>33</sup>. The 2024 Report of the State Attorney's Office<sup>34</sup> shows that the number of suspects of corruption offences in 2024 remained stable<sup>35</sup> and that the number of criminal investigations increased<sup>36</sup>, with new corruption cases continuing to come to light, including by high-level officials. In 2024, the State Attorney's Office indicted, after investigation, 155 persons (121 in 2023). In

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<sup>27</sup> In 2020, the score was 47, while in 2024, 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>28</sup> Data from Special Eurobarometer 561 (2025) and Flash Eurobarometer 557 (2025).

<sup>29</sup> Croatian Government (2024). There are more activities included in the Action Plan that are explained later in this chapter.

<sup>30</sup> Croatian Government (2025).

<sup>31</sup> DORH Report for 2024. Croatian Government (2025), written input, pp. 19-21, and country visit Croatia, USKOK.

<sup>32</sup> On 19 November 2024, the State Attorney General reassigned a case of corruption, which was investigated both by the EPPO and national prosecutors, to national prosecutors (USKOK). EPPO (2025) and country visit Croatia, PNUSKOK, USKOK and EPPO.

<sup>33</sup> The statistics in PNUSKOK count criminal offences, not number of cases or suspects like USKOK. A single suspect may have committed several offences. Country visit Croatia, PNUSKOK.

<sup>34</sup> State Attorney's Office (2025), pp. 224-228.

<sup>35</sup> In 2024, the State Attorney's Office received criminal notifications regarding 1 464 alleged suspects of corruption offences (similar to 1 491 in 2023), representing 76.81% of the total criminal notifications received by USKOK. Country visit Croatia, DORH and USKOK, and State Attorney's Office (2025), p. 224.

<sup>36</sup> In 2024, investigations were opened concerning 149 persons (128 in 2023). State Attorney's Office (2025), p. 224.



the same period, the courts continued to deliver more judgments than in past years<sup>37</sup>. As regards foreign bribery, the OECD highlighted that Croatia is enhancing detection and awareness of foreign bribery, but more efforts are needed since it also found that Croatian authorities did not detect most of the allegations reported in the media and there have been no formal investigations<sup>38</sup>.

**There has been some progress on the recommendation to revise legal provisions relevant for the efficiency of investigation and prosecution of corruption offences<sup>39</sup>.**

Working groups have been discussing possible revisions to legislation since 2022 and the government plans to adopt draft legislation by the first quarter of 2026<sup>40</sup>. The Government indicated this may include measures to focus the competence of USKOK on more serious forms of corruption which could include the offence of abuse of office, with other crimes left to municipal prosecutors. The State Attorney General supported amendments that would reduce the number of hearings before the panel of judges verifying the indictment, for example by allowing *in camera* discussions or exchanges in writing<sup>41</sup>. 72% of all convictions in USKOK corruption cases involved plea bargaining agreements, without a full trial taking place<sup>42</sup>. The percentage of USKOK cases where the investigation was finished within six months to one year increased<sup>43</sup>. In terms of resources, salary increases led to more applications for positions in USKOK but many candidates were found to lack the necessary skills and experience to be recruited, and USKOK considers that its service remains understaffed<sup>44</sup>. The State Attorney General supports amendments to the Law on USKOK that would lower the seniority requirement for the Head of USKOK, which would make more candidates eligible<sup>45</sup>. As for court proceedings, the Recovery and Resilience Plan for Croatia includes a target on efficiency of corruption court proceedings<sup>46</sup>. Croatia has also amended its Code of Criminal Procedure to ensure that specific evidentiary actions, such as wiretapping, may also be imposed for the offence of bribery of representatives (i.e. deputies)<sup>47</sup>. Therefore, there has been some progress on the implementation of the recommendation made in the 2024 Rule of Law Report.

**The Commission for the Resolution of Conflict of Interest continues to face difficulties in verifying asset declarations, as its resources are limited and digital tools are not yet fully operational.** In Croatia, there are approximately 3 000 public officials required by the

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<sup>37</sup> There were judgments concerning 314 persons in 2024 (179 in 2023). Out of the 314 judgments in 2024, 301 were convictions for corruption (i.e., conviction rate of 96%, compared to 66% in 2023). As regards the sanctions for corruption offences, 76 persons received a prison sentence in 2024 (47 in 2023). State Attorney's Office (2025), pp. 224-225.

<sup>38</sup> OECD (2024).

<sup>39</sup> The 2024 Rule of Law Report recommended Croatia 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'.

<sup>40</sup> Croatian Government(2025a).

<sup>41</sup> Country visit Croatia, State Attorney's Office.

<sup>42</sup> Country visit Croatia, USKOK.

<sup>43</sup> State Attorney's Office (2025), p. 174. Cases where the investigation was finished within six months or sooner: 42% in 2024 (compared to 16% in 2023, 35% in 2021). More investigations were finished within a year, namely about 69% in 2024 (57% in 2023).

<sup>44</sup> Country visit Croatia, USKOK.

<sup>45</sup> From 15 to 12 years. Country visit Croatia, DORH.

<sup>46</sup> The Recovery and Resilience Plan for Croatia includes target 238 which states: 'Reduction by 200 days of the average length of court cases for corruption and organised crime offences compared to Q1/2021 (999 days)'. The target is part of tenth payment request, hence it has not yet been assessed by the Commission.

<sup>47</sup> Country visit Croatia, Ministry of Justice, Public Administration and Digital Transformation.

Law on the Conflict of Interest System to declare their assets. The Commission for the Resolution of Conflict of Interest (CRC) decided to introduce a prioritisation strategy to render more effective the regular content verifications. Therefore, within the framework of available human and technical capacities, CRC adopted an annual regular content verification plan to carry out, *ex officio*, regular content verifications of the last submitted and preliminary (administrative) verified asset declaration of 50 obliged entities of certain duty categories, determined based on a random selection from the Register of obliged entities. In addition, the CRC verifies declarations where it has knowledge of increased risk based on complaints or media reporting<sup>48</sup>. The CRC is also tasked with supervising the obligation of municipal council members to declare shareholdings in companies above 5%. It continues to be difficult for the CRC to verify these submissions, which are made to local councils<sup>49</sup>. An IT tool was finalised that allows officials to automatically retrieve data about their property and property of their partner and minor children from existing state registers, as a facilitation in filling out the asset declarations, and for the CRC to compare data in submitted asset declarations with the data in these registers<sup>50</sup>. However, as the comparison tool is part of larger IT platform that remains under construction, the CRC notes that it can only carry out manual verifications and that the system does not yet automatically notify discrepancies between declarations and data in other registries, making cross-verification challenging<sup>51</sup>.

**Codes of ethics are in place at all levels of the administration and Government.** At local level, all administrations have now adopted a code of conduct. In February 2025, a new Code of Ethics for civil servants and employees at state level, regulating the declaration and handling of conflicts of interests, entered into force<sup>52</sup>. As regards the 2022 Code of Conduct for State Officials in Executive Bodies, the Implementation Council provided training on the Code to most of the officials covered<sup>53</sup>. In 2024, it provided two opinions on compliance with the Code, following the received requests. The number of opinions that the CRC provided to public officials in 2024 remained at around 200<sup>54</sup>. The Parliament Committee on the Constitution, Standing Orders and Political System received two requests in 2024 relating to alleged breaches of the Code of Ethics<sup>55</sup>. The OECD has suggested that Croatia could invest in awareness raising and education about the Code of Conduct among parliamentarians and parliamentary staff, including by developing accompanying guidance and concrete practice examples<sup>56</sup>.

**The implementation of the new law on lobbying is on track, while the public is not directly informed about meetings between lobbyists and officials.** The law on lobbying

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<sup>48</sup> CRC (2024), and OECD (2024), p. 12. (Plan for 2025 to be adopted still).

<sup>49</sup> 2022 Rule of Law Report, Croatia. Even where the CRC would detect non-compliance, it lacks the power to investigate and impose a sanction.

<sup>50</sup> This is part of national Recovery and Resilience Plan, Milestone no. 241. The milestone is part of sixth payment request, hence it has not yet been assessed by the Commission.

<sup>51</sup> Country visit Croatia, CRC. The Chair of the CRC resigned on 11 April 2025. Parliament approved the CRC Chair's resignation, and the remaining members of the Commission appointed an Acting President of the Commission on 30 April 2025.

<sup>52</sup> Croatian Government (2025), written input, p. 15, and country visit Croatia, Ministry of Justice, Public Administration and Digital Transformation.

<sup>53</sup> Two trainings took place in 2024. OECD (2024), p. 11.

<sup>54</sup> Country visit Croatia, CRC.

<sup>55</sup> Country visit Croatia, Parliament Secretariat. Violations of the Code of Ethics are not subject to sanctions.

<sup>56</sup> OECD (2024), p. 16.

entered into force on 1 October 2024<sup>57</sup>. The same month, the CRC adopted the ‘Rulebook on Keeping the Register of Lobbyists’. Officials may only engage in meetings with entities included in the register and the CRC can impose sanctions for violations of the law. The register includes data on lobbyists but not on the meetings that took place. International guidelines on lobbying recommend making publicly available, timely, comprehensive and detailed information on all lobbying activities<sup>58</sup>. Lobbyists must report annually to the CRC on their activities, including who they meet, but this data will not be recorded in the lobby register, and it is made available only following access to information requests. The inability of the public to see what lobbyist their officials and representatives are meeting significantly limits transparency of interest representation<sup>59</sup>. As regards obligations for state officials, they are required to regularly disclose important meetings with third parties publicly on the website of the authority in which the official holds office or via social media<sup>60</sup>.

**The State Audit Office reported no substantial violations of the rules on political party financing.** As in previous years, most of the parties audited by the State Audit Office did not fully comply with the Law on Financing Political Activities, Election Campaigns and Referendums in their operations<sup>61</sup>. The number of temporary suspensions of disbursement of funds for not providing annual reports, as well as the forfeiture of the payment of part of the funds for those not complying with the reminder to provide that report is similar as in last year<sup>62</sup>. At the same time, the State Audit Office reported that there were no substantial violations of the rules of political party financing that could indicate corruption<sup>63</sup>.

**The Government is raising awareness about the harmfulness of corruption and the importance of whistleblower legislation.** The number of external and internal reports by whistleblowers to the Ombudsperson has remained stable in 2024<sup>64</sup>. The Ombudsperson notes that competent authorities often need a lot of time to follow-up on reports and need to be reminded. The Ombudsperson has also reported about significant delays in legal

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<sup>57</sup> 2023 Rule of Law Report, Croatia; OECD (2024), pp. 28-29; Croatia fulfilled 25% of OECD criteria on regulatory framework for lobbying and 22% of OECD criteria on implementation. Now that the Lobbying Law is in effect, Croatia fulfils 75% of criteria on regulations and 89% of criteria for implementation.

<sup>58</sup> OECD, Recommendation of the Council on Transparency and Integrity in Lobbying and Influence, OECD/LEGAL/0379, p.8.

<sup>59</sup> This criticism was also expressed by the OECD and civil society (Civil Liberties Union for Europe (2025)). OECD also identified some gaps and areas where it could be better aligned with current best practice. For example, the definition of lobbying is narrow as it only focuses on direct oral or written communications with a lobbied person. In addition, the list of exemptions is quite broad, including persons participating as experts in meetings, sessions or consultations organised by government, and may offer important loopholes due to vague wording, see OECD (2024), pp. 28-29.

<sup>60</sup> The Code of Conduct for State Officials in Executive Bodies does not 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 (OECD (2024)).

<sup>61</sup> Country visit Croatia, State Audit Office.

<sup>62</sup> The State Electoral Commission decided in 37 cases (41 in 2022) to temporarily suspend the disbursement of the funds. It issued 33 decisions (29 for 2022) on forfeiture of the payment of part of the funds for regular annual funding because these 25 individuals and 3 parties did not submit by the end of 2024 the annual accounts for 2023.

<sup>63</sup> 31 of 47 political parties and 3 of five independent representatives. The irregularities identified by the audit of political parties for 2024, compared to 2023, continue to be most significant in the area of financial statements and accounting.

<sup>64</sup> 46 external reports in 2023, compared to 57 in 2023, and 50 internal reports in 2024, compared to 38 in 2023; the public sector tends to make more reports, and only 10% of the reports turns out to fall within the scope of the law; Country visit Croatia, People’s Ombudsperson Office, and People’s Ombudsperson’s Office (2025), pp. 247-259.

proceedings concerning retaliatory measures taken against whistleblowers<sup>65</sup>. The Rehabilitation Centre for Stress and Trauma was contracted in September 2024 to provide emotional support to whistleblowers. The virtual assistant tool to provide information about whistleblowing rules and procedures remains in development and is expected to be finalised in 2025, as part of a wider IT anti-corruption platform<sup>66</sup>. In September 2024, the Ombudsperson also presented<sup>67</sup> a Guide for reporting irregularities to inform potential whistleblowers and confidential persons on the personal and material scope of application of the Act, and possible legal remedies. Parliament has so far not discussed the recent annual reports of the Ombudsperson and the Commission for the Resolution of Conflicts of Interest, nor has there been a follow-up on their recommendations by the addressed entities<sup>68</sup>. Stakeholders consider that prevention and education should be stepped up, including by awareness campaigns on the harmfulness of corruption<sup>69</sup>. The Ministry of Justice, Public Administration and Digital Transformation continued an information and educational campaign aimed at raising awareness of the harmfulness of corruption and encouraging citizens to actively participate in the fight against corruption<sup>70</sup>. The Ministry is evaluating the effects of this campaign.

**Measures were taken to address corruption in public procurement, which remains a high-risk area of corruption.** Businesses' attitudes towards corruption in the EU shows that 27% of companies in Croatia (EU average 25%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years<sup>71</sup>. 27% 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<sup>72</sup>. The Single Market and Competitiveness Scoreboard on access to public procurement in Croatia reports 23% of single bids for 2023 (29% EU average). In November 2024, the Minister of Health was arrested on suspicion of corrupt practices in public procurement procedures. The Ministry of Health has conducted an audit of all extraordinary public procurements in healthcare, which provided no significant discoveries according to the Minister of Health<sup>73</sup>. The mandate of more members of DKOM expired. While Parliament has not yet appointed (seven) new members, interviews with candidates were held in January 2025<sup>74</sup>. As a result, only one out of the three councils solving appeals is operational<sup>75</sup>. DKOM did not transmit any reports about corruption to the State Attorney's Office. The Electronic Public Procurement Notice (EOJN) RH platform was

<sup>65</sup> Country visit Croatia, People's Ombudsperson Office, OECD (2024), p. 13.

<sup>66</sup> Country visit Croatia, Ministry of Justice, Public Administration and Digital Transformation.

<sup>67</sup> People's Ombudsperson Office (2024)

<sup>68</sup> OECD (2024), p. 11.

<sup>69</sup> Country visit Croatia, State Attorney's Office and USKOK.

<sup>70</sup> Ministry of Justice, Public Administration and Digital Transformation (2025).

<sup>71</sup> Flash Eurobarometer 557 on Businesses' attitudes towards corruption in the EU (2025). This is 2 percentage points above the EU average.

<sup>72</sup> Figure 59, 2025 EU Justice Scoreboard.

<sup>73</sup> Country visit Croatia, Ministry of Health. Večernji list (2025).

<sup>74</sup> Country visit Croatia, DKOM. 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>75</sup> There was a further decrease in the share of public procurement procedures reviewed by DKOM to only 2.6% of all published procedures in 2024 (down from 3.6% in 2023) which it considers is mostly due to the increase of review fees in October 2022.



further upgraded to simplify processes and making information easier accessible to the public and oversight authorities<sup>76</sup>.

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

**The independently financed Agency for Electronic Media remains important for media oversight and promoting pluralism.** Initially planned in 2024, the reform of the Law on Croatian Radio-Television and the Law on Electronic Media was delayed due to significant disruptions in the distribution of print media, which the Government aims to address through subsidies<sup>77</sup>. The Ministry of Culture and Media aims to present the revised Law on Media to Parliament in 2025, intended also to implement certain provisions of the European Media Freedom Act (EMFA)<sup>78</sup>. This would include plans to expand the mandate of the media regulator – Agency for Electronic Media (AEM) – to encompass all forms of media, including print<sup>79</sup>, which is a part of a broader effort to establish a unified regulatory framework, aiming to enhance comprehensive media oversight. AEM remains involved in tackling disinformation and hate speech, funding several projects and supporting the new national fact-checking platform<sup>80</sup>. Media literacy efforts remain a strong focus, with several projects funded in 2024, including initiatives to educate high school students on AI-generated misinformation. The Council for Electronic Media – the governing body of the Agency – faces scrutiny regarding the indefinite re-election of its members, prompting discussions about the implementation of term limits to prevent prolonged governance risk and introduce fresh perspectives.

**Croatia's public broadcaster, Croatian Radio-Television, is undertaking significant reforms to address financial and governance challenges.** HRT is engaged in developing a robust reform and restructuring plan. Central to this initiative is the establishment of a new legislative framework that would focus on building a stable and independent financial model and would include governance changes, expected to be presented by the Government by end of 2025<sup>81</sup>. Since 2010, HRT has encountered severe financial challenges due to an unchanged subscription fee, resulting in diminishing revenues. The financial difficulties are mostly related to the existing funding model, viewed by HRT and stakeholders as outdated<sup>82</sup>, which has led to ongoing discussions on alternative approaches. To address its financial situation, HRT has announced the reduction in its workforce by approximately 1 000 employees, equivalent to one-third of its staff<sup>83</sup>. This has prompted the Government to provide direct support for severance packages, with voluntary leave programmes already in progress. Government intervention was considered necessary but not sufficient to address the structural financial issues. According to MPM 2025, independence of Public Service Media indicators score in the high-risk band<sup>84</sup>, while concerns persist regarding media freedom and pluralism

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<sup>76</sup> DKOM (2025).

<sup>77</sup> Country visit Croatia, Ministry of Culture and Media, and Croatian Newspapers Publishers Association. The sudden contract termination by the country's sole retail distributor left publishers searching for alternatives. In response, the Croatian Post temporarily assumed responsibility for subscription-based distribution, while retail distribution channels remain unresolved. This situation threatens the affordability and accessibility of publications.

<sup>78</sup> Country visit Croatia, Ministry of Culture and Media.

<sup>79</sup> Country visit Croatia, Ministry of Culture and Media, and Agency for Electronic Media.

<sup>80</sup> Online platform, available at: <https://tocnotako.hr/>; Country visit Croatia, Ministry of Culture and Media.

<sup>81</sup> Country visit Croatia, Ministry of Culture and Media, and HRT Management.

<sup>82</sup> Country visit Croatia, HRT Management, Croatian Journalists' Association (2025), written input, p. 15.

<sup>83</sup> Country visit Croatia, HRT Management.

<sup>84</sup> Media Pluralism Monitor (2025), p. 25.



at HRT. Journalists have publicly reported issues of political influence, editorial interference, and censorship<sup>85</sup>, though HRT's management contests these claims<sup>86</sup>.

**There was no progress yet to strengthen the legal framework and oversight mechanisms to ensure a fair and transparent allocation of state advertising at national, regional and local level<sup>87</sup>.** State regulation of resources and support to the media sector scores the medium-low risk band, however, the Media Pluralism Monitor notes issues with the lack of transparency in state advertising<sup>88</sup>. The framework for allocation of state advertising continues to raise significant concerns, with no progress made to strengthen it since the 2024 Rule of Law Report. According to the Government, the general provision in the Law on Budget emphasises transparency in state spending<sup>89</sup>. However, some stakeholders have raised concerns about state advertising not being allocated based on transparent criteria, as well as challenges in fully meeting reporting requirements, particularly at the local level<sup>90</sup>. In some cases, contracts between local authorities and media organisations may create ambiguity between promotional content and journalism, which could have implications for editorial independence, underscoring the importance of establishing a transparent and accountable system. The complexity of reporting requirements exacerbates these issues, as local authorities often struggle to fully adhere to transparency requirements. The Government is preparing legislation on the implementation of the EMFA that aims to address this issue<sup>91</sup>. However, overall, there has been no progress yet on the recommendation to ensure a fair and transparent allocation of state advertising.

**A new centralised media ownership and financing database has been launched on AEM's website.** As part of the Recovery and Resilience Plan, the "Platform for Publishing Media Ownership Structure and Sources of Media Financing" has been launched. It aims to provide information on media service providers, including their ownership structures, financial sources, state aid received, and market concentration<sup>92</sup>. It includes information on media outlets and their registered owners, along with details on revenues, funding methods and sources, and concession data and it aims to tackle also the data on beneficial owners<sup>93</sup>. The database has been launched in view of the obligations of the European Media Freedom

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<sup>85</sup> Country visit Croatia, Croatian Journalists' Association.

<sup>86</sup> Country visit Croatia, HRT Management.

<sup>87</sup> The 2024 Rule of Law Report recommended Croatia to '[s]tep 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'.

<sup>88</sup> Media Pluralism Monitor (2025), pp. 29-30.

<sup>89</sup> Article 144 stipulates the obligation to publish documents and information on spending of funds. Croatian Government, written input, p. 21.

<sup>90</sup> Croatian Journalists' Association (2025), written input, pp. 14-15.

<sup>91</sup> Croatian Government (2025a). While the Law on Media as amended in 2021 requires such funds to be distributed based on a public call including relevant criteria, it does not specify these criteria or any procedural safeguards. In this context, clear criteria, good practices and oversight measures are missing to guarantee the effective and transparent functioning of the allocation procedure. 2024 Rule of Law Report, Croatia, pp. 22-23.

<sup>92</sup> Country visit Croatia, Ministry of Culture and Media and Croatian Newspapers Publishers Association.

<sup>93</sup> Novilist.hr (2025).

Act<sup>94</sup>. It allows searches by media and individuals and aggregates data from several institutions while being available in an easily accessible manner<sup>95</sup>.

**While journalists primarily rely on the Law on Media to access public information, authorities are not bound to reply within any deadline and there is no independent oversight.** As a result, investigative journalists are increasingly turning to the Law on the Right of Access to Information, which provides a fixed deadline and enforcement by the Information Commissioner. At the end of 2024, the Ministry of Justice, Administration, and Digital Transformation established a working group to draft amendments to the Law on the Right of Access to Information with the aim of improving the right to access to information, finding the best solutions to improve the application of this Law and eliminate possible shortcomings in its application. It is expected to conclude its work by the end of 2025. Journalists reported that public authorities often delay responses, provide partial or incomplete information, or invoke personal data protection as a frequent basis for refusal<sup>96</sup>. The new criminal offence for unauthorised disclosure of information from ongoing criminal investigations continued to raise concerns among stakeholders for their possible impact on journalistic sources<sup>97</sup>.

**Journalists still face a number of challenges although efforts to improve their safety are ongoing.** The Media Pluralism Monitor 2025 highlights the medium-high risk as for journalistic profession, standards and protection<sup>98</sup>. Regarding journalists' safety, the cooperation agreement signed in 2023 between the Ministry of the Interior and journalists' organisations has reportedly improved relations between police and media workers, particularly at the national level<sup>99</sup>. As part of the agreement, journalists are invited to attend presentations and trainings raising awareness of the safety of journalists<sup>100</sup>. Moreover, stakeholders point to the need to ensure awareness about the protocol to avoid inconsistent application<sup>101</sup>. Since the publication of the 2024 Rule of Law Report, the Council of Europe's Platform to promote the protection of journalism and safety of journalists has registered four new alerts relating to a lack of adequate protection under defamation and insult practice, threats and harassment, and attacks on physical safety and integrity<sup>102</sup>. The Mapping Media Freedom monitoring report has flagged seventeen alerts, twelve of which concern verbal

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<sup>94</sup> Country visit Croatia, Ministry of Culture and Media.

<sup>95</sup> Country visit Croatia, Ministry of Culture and Media. The Ministry described that this platform integrates data from various internal and external systems, including the AEM system, the National Identification and Authentication System (NIAS), and the Tax and Court Registries.

<sup>96</sup> Croatian Journalists' Association (2025), written input, p. 18; Media Pluralism Monitor (2025), p. 5.

<sup>97</sup> Croatian Journalists' Association (2024). As reported last year, amendments adopted in March 2024 to the Criminal Code exempted journalists from liability for the offence for unauthorised disclosure of information from ongoing criminal investigations. This new offence is in force since April 2024. Until February 2025, the State Attorney's Office initiated six investigations related to this offence. None of these investigations were undertaken against journalists. Some stakeholders continue to raise concerns about the potential threats to journalistic freedom from the perspective of protection of sources. Country visit Croatia, GONG and Croatian Journalists' Association. Some stakeholders have also explored how this law interacts with existing media protections, such as those established by the Law on Media. Country visit Croatia, Croatian Journalists' Association and the Ombudsperson's Office.

<sup>98</sup> Media Pluralism Monitor (2025), p. 14.

<sup>99</sup> Country visit Croatia, Ministry of the Interior and Croatian Trade Union of Journalists.

<sup>100</sup> AEM.hr (2025).

<sup>101</sup> Croatian Journalists' Association (2025), written input, p. 17.

<sup>102</sup> Council of Europe, Platform to promote the protection of journalism and safety of journalists (2025).

attacks, four relate to incidents of interferences, two relate to physical assaults and the remaining two to legal incidents<sup>103</sup>.

**Work on the recommendation to address the issue of strategic lawsuits against public participation targeting journalists (SLAPPs), is ongoing<sup>104</sup>.** SLAPPs remain a serious concern in Croatia. The Media Pluralism Monitor indicates the medium-high risk band in the category of protection of freedom of expression<sup>105</sup>. The Ministry of Justice, Public Administration and Digital Transformation established a working group to begin discussions on transposing the Anti-SLAPP Directive, bringing together representatives from the Ministry of Culture and Media, judges, and legal scholars<sup>106</sup>. The National Coordination Committee, formed in March 2024, has made limited headway in supporting the National Plan for Culture and Media (2023-2027) and journalist safety<sup>107</sup>. A survey conducted by the Croatian Journalists' Association counted that as of May 2025 at least 696 active lawsuits against journalists and media outlets were recorded<sup>108</sup>, 125 of which were filed by influential figures of public life, such as politicians and judges<sup>109</sup>. Most cases relate to insult and slander, criminalised under Criminal Code, and civil lawsuits with high damage claims<sup>110</sup> continue to exert financial pressure, especially on smaller media outlets. The Ministry of Justice, Public Administration, and Digital Transformation reviewed civil damage lawsuits in 2024 to estimate the number of potential SLAPPs. The analysis found that 25 civil cases and 7 criminal cases could be considered SLAPP. Of 25 civil cases, 10 were finalised, including 5 that had been ongoing since 2023<sup>111</sup>. The National Action Plan includes measures to tackle SLAPPs<sup>112</sup>. In May 2025, the Working Group on SLAPPs and the National Coordination Committee for the Implementation of Measures of the Action Plan<sup>113</sup> presented an educational brochure on combatting SLAPPs<sup>114</sup>. Moreover, a series of joint trainings for judges and journalists has been conducted in all regional centers of the Judicial Academy in Croatia<sup>115</sup>. Lower courts often fail to apply protections effectively whereas stakeholders have also noticed the inconsistency in court practices<sup>116</sup>. The educational material and trainings prepared by the Working Group also serve as a tool for judges and lawyers to identify

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<sup>103</sup> European Centre for Press and Media Freedom (2025).

<sup>104</sup> The 2024 Rule of Law Report recommended Croatia to '[m]ake further 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'.

<sup>105</sup> Media Pluralism Monitor (2025), p. 12.

<sup>106</sup> Country visit Croatia, Ministry of Justice, Public Administration and Digital Transformation.

<sup>107</sup> Croatian Journalists' Association (2025), written input, p. 20.

<sup>108</sup> Croatian Journalists' Association (2025).

<sup>109</sup> The final results of the joint study by the Centre for Democracy and Law Miko Tripalo confirmed that 40% of court rulings against journalists between 2016 and 2023 bear SLAPP characteristics, with lawsuits often lasting over a decade. Centre for Democracy and Law Miko Tripalo (2024), p. 6.

<sup>110</sup> As estimated by HND, civil defamation lawsuits remain prevalent, making up 629 cases, which represent 90% of all legal actions. Some journalists raised concerns that defamation and insult remain criminal offences, as they are often linked to SLAPP tactics. Media Pluralism Monitor (2025), p. 12.

<sup>111</sup> Croatian Government (2025a).

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

<sup>113</sup> National Coordination Committee for the Implementation of the Measures of the Action Plan for the Development of Culture and Media and the Council of Europe and the OSCE Campaign for the Safety of Journalists.

<sup>114</sup> AEM.hr (2025a).

<sup>115</sup> Ibid.

<sup>116</sup> Country visit Croatia, Centre for Democracy and Law Miko Tripalo (2024), pp. 17-22.

SLAPPs early on and dismiss such lawsuits<sup>117</sup>. Therefore, there has been some progress on the recommendation to address the issue of SLAPPs targeted at journalists.

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

**Impact assessments and evaluations of laws expanded, and the portal for public consultations was introduced to local and regional levels.** Following the entry into force in January 2024 of the new Law on Better Regulation Policy Instruments, the number of regulatory impact assessments increased several-fold to 23 draft laws (21% of all 2024 proposals) with the goal that majority of laws proposed in 2025 would be assessed<sup>118</sup>. As regards the new instrument for the evaluation of regulations, three such evaluations of adopted and implemented laws were carried out in 2024 (in the areas of State aid, for research and development projects, pension adequacy and consolidation of land), with two additional planned for 2025. In 2024, there were 896 consultations conducted through the e-Consultations portal<sup>119</sup>. The length of consultations further increased to 22 days on average (21 in 2023). The share of received comments that remained unanswered decreased to 13% (21% in 2023)<sup>120</sup>. In November 2024, the e-Consultations portal was opened for use by local and regional self-government units<sup>121</sup>. As regards its 2023 recommendation to the Government authorities to provide a greater number of reasoned replies to comments, the People's Ombudsperson found that 42% of comments either did not receive a reply or were only acknowledged meaning that the consultations do not fulfil its purpose as they are not allowing for proper participation, and therefore repeated its recommendation<sup>122</sup>. As regards the legislative process, the share of laws adopted by urgent procedure in Parliament has increased to 34% in 2024, as compared to 26% in 2023<sup>123</sup>.

**Over half of the companies surveyed in Croatia express confidence in the effectiveness of investment protection.** 53% of companies are very or fairly confident that investments are protected by law and courts<sup>124</sup>. Business stakeholders raised the efficiency and quality of the justice system and the quality and frequent changes in legislation as the main challenges for investing in Croatia<sup>125</sup>. As regards authorities relevant for economic operators, 32% perceive the level of independence of the national competition authority (The Croatian Competition Agency) as very or fairly good<sup>126</sup>. A number of judicial mechanisms are in place at the level of the High Administrative Court to ensure the implementation of their judgments, which

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<sup>117</sup> AEM.hr (2025a).

<sup>118</sup> In 2023, only four draft laws underwent a regulatory impact assessment. Country visit Croatia, Government's Office for Legislation.

<sup>119</sup> There were 822 consultations in 2023 and 1 028 in 2022. Country visit Croatia, Government's Office for Legislation.

<sup>120</sup> In 2024, a total of 4 735 individuals and legal entities participated (6 441 in 2023). Altogether, 127 representatives of civil society organisation took part in public consultations (325 in 2023). Country visit Croatia, Government's Office for Legislation.

<sup>121</sup> Croatian Government (2025), written input, p. 30.

<sup>122</sup> People's Ombudsperson (2025), pp. 16-17.

<sup>123</sup> This was an increase compared to 2023, when Parliament adopted 26% of laws using the urgent procedure – which was then the lowest in a decade (ranging from 31% in 2021 to 81% in 2014). Croatian Government (2025), written input, p. 31.

<sup>124</sup> Figure 54, 2025 EU Justice Scoreboard. In Croatia, 32% of companies perceive the frequent changes in legislation or concerns about quality of law-making process and unpredictable/non-transparent administrative conduct as the main reasons for the perceived lack of effectiveness of investment protection. Figure 55, 2025 EU Justice Scoreboard.

<sup>125</sup> Country visit Croatia, AmCham.

<sup>126</sup> Figure 60, 2025 EU Justice Scoreboard.

include the possibility to substitute the annulled administrative act. However, these mechanisms do not include disciplinary actions against the responsible officials, or the possibility to award direct or consequential damages or compensation<sup>127</sup>.

**On 1 January 2025, Croatia had 30 leading judgments of the European Court of Human Rights pending implementation, an increase of 3 compared to the previous year<sup>128</sup>.** At that time, Croatia's rate of leading judgments from the past 10 years that had been implemented was at 68% (compared to 72% in 2024; 32% remained pending), and the average time that the judgments had been pending implementation was 2 years and 3 months (compared to 3 years and 4 months in 2024)<sup>129</sup>. The oldest leading judgment, pending implementation for 10 years, concerns violations of the applicants' right to the peaceful enjoyment of their property between 1997 and 2015 on account of statutory limitations on the use of private flats by landlords<sup>130</sup>. As regards the respect of payment deadlines, on 31 December 2024 there were 12 cases in total awaiting confirmation of payments (compared to 2 in 2023)<sup>131</sup>. On 16 June 2025, the number of leading judgments pending implementation had increased to 36<sup>132</sup>.

**Significant progress was made on the recommendation to improve follow-up to the People's Ombudsperson's recommendations and on access to information<sup>133</sup>.** The Public Ombudsperson's Office fulfils the role of the National Human Rights Institution and is accredited with A-status<sup>134</sup>. In autumn 2024, the Government's Office for Human Rights and Minority Rights collected information from all relevant authorities about the implementation of the recommendations from the Ombudsperson's report for 2023. According to the Government, the analysis has shown that 73.3% of recommendations issued in 2023 have been implemented, are being implemented, or are in the implementation plan (60.6% of those issued in 2022 were implemented in 2023)<sup>135</sup>. In 2024, according to the Ombudsperson, the implementation of recommendations further improved, as around 61% of all recommendations given in 2023 have either been already implemented or are in the process of being implemented (44% of those issued in 2022 were implemented in 2023)<sup>136</sup>. As regards access to information, the Ombudsperson's Office reported an improvement as they received the requested information during both field visits to facilities with irregular migrants, which once included access to the Police ICT system<sup>137</sup>. Therefore, significant

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<sup>127</sup> Figure 49, 2025 EU Justice Scoreboard. The data presented reflect 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>128</sup> For an explanation of the supervision process, see the [website](#) of the Council of Europe.

<sup>129</sup> All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2025. EIN (2025), written input, p. 2.

<sup>130</sup> Judgment of the ECtHR, 12027/10, *Statileo v. Croatia*, pending implementation since 2014.

<sup>131</sup> Council of Europe (2025), p. 156.

<sup>132</sup> Data according to the online database of the Council of Europe (HUDOC).

<sup>133</sup> The 2024 Rule of Law Report recommended Croatia to 'further improve the follow-up to recommendations and ensure a more systematic response to information requests of the Ombudsperson'.

<sup>134</sup> According to the Principles relating to the Status of National Institutions (The Paris Principles).

<sup>135</sup> Country visit Croatia, Government's Office for Human Rights and Minority Rights, and Croatian Government (2025a). In agreement with Ombudsperson's Office, authorities published an annex of the Government's annual implementation report containing descriptive responses on recommendation implementation.

<sup>136</sup> People's Ombudsperson (2025), p. 333.

<sup>137</sup> In 2024, Ombudsperson's Office conducted five such field visits. Ombudsperson's Office also requested information about treatment in 20 individual cases of migrants, which included, in 12 cases, a request for



progress was made on the recommendation regarding Ombudsperson's recommendation and access to information.

**The shift toward multiannual funding of civil society organisations continued, while the new National Plan for Creating an Enabling Environment remains under preparation.**

The civic space in Croatia is considered to be narrowed<sup>138</sup>. As reported last year, the Working Group developing the National Plan for Creating an Enabling Environment had technically completed the draft for internal governmental consultation<sup>139</sup>. The National Plan was still in development<sup>140</sup>. CSOs see the need for the National Plan to be adopted to address issues relating to the financing framework, access and participation in decision-making processes, and institutional framework for civil society<sup>141</sup>. In 2024, the shift from short-term support towards multiannual systematic and continuous financing continued, and this expected to be sustained into 2025<sup>142</sup>. However, some civil society organisations consider the administrative burden in applying for funds to be a challenge<sup>143</sup>.

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copies of the Police case files. Country visit Croatia, Ministry of the Interior. Police provided information in all these requests. Country visit Croatia, People's Ombudsperson's Office.

<sup>138</sup> Rating given by Civicus, Croatia; ratings are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed.

<sup>139</sup> 2024 Rule of law Report, Croatia, p. 40.

<sup>140</sup> Country visit Croatia, Government's Office for Cooperation with the NGOs

<sup>141</sup> Civil Liberties Union for Europe (2025), p. 219.

<sup>142</sup> Country visit Croatia, Government's Office for Cooperation with the NGOs. According to the data of the National Foundation for Civil Society Development, in 2024, a total of 305 financial supports were provided for 18 program areas, and in 2025, 409 financial supports is planned to be provided for a total of 20 areas. The value of support, which was around EUR 3 million in 2024, would increase to around EUR 3.5 million for 2025.

<sup>143</sup> Some civil society pointed out that funding is primarily focused on supporting civil society organisations that provide social services, rather than organisations contributing to better public policy management, monitoring reforms in the rule of law, combating corruption, and enhancing transparency. Civil Liberties Union for Europe (2025), and country visit Croatia, The Human Rights House Zagreb and Centre for Democracy and Law Miko Tripalo with contributions from Croatian Journalist Association, Centre for Peace Studies, Rainbow Families Croatia, Zagreb Pride, Udruga RODA, Youth Initiative for Human Rights – Croatia, GONG, Green Action, DKolektiv, Center for peace, non-violence and human rights and Croatian Platform for International Citizen Solidarity-CROSOL.

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

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

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

The Commission services held virtual meetings in February 2025 with:

- Agency for Electronic Media
- American Chamber of Commerce - Croatia
- Association of Judges (Judge Damir Kontrec)
- Centre for Democracy and Law Miko Tripalo
- Centre for Peace Studies
- Commission for the Resolution of Conflicts of Interest
- Croatian Journalists' Association
- Croatian Newspaper Publishers' Association
- Crosol - Croatian Platform for International Citizen Solidarity
- 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 People's 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
- State Judicial Council
- Supreme Court (Vice-President Gordana Jalšovečki and judge Damir Kontrec)
- Trade Union of Croatian Journalists

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

- Amnesty International
- Araminta
- Civil Liberties Union for Europe
- Civil Society Europe
- European Civic Forum
- European Partnership for Democracy
- European Youth Forum,
- International Commission of Jurists
- International Federation for Human Rights (FIDH)



- JEF Europe
- Philea – Philanthropy Europe Association.
- Transparency International