2026 Rule of Law Report

Civil Society Gap Recommendations

November 2026

This document contains rule of law recommendations identified by 17 civil society organisations in Croatia – Human Rights House Zagreb (KLJP), Croatian Journalists Association (CJA), Centre for Democracy and Law Miko Tripalo (CMT), Gong, POMAK - association for the promotion of good governance and work, Sidro Association - Educators in the protection of children's rights, DKolektiv, Information Legal Center (IPC), Udruga RODA, Center for peace, non-violence and human rights Osijek (CZMOS), Centre for Peace Studies (CMS), Sunce - Association for Nature, Environment and Sustainable Development, Center for Civic Initiatives Poreč (CGI Poreč), Croatian Platform for International Citizen Solidarity-CROSOL, SUZAH – Alliance of Autism Associations, Croatian Youth Network (CYN), Politiscope and supported by Green Forum (a coalition of 33 environmental organisations) – and overlooked by the European Commission in its official Rule of Law Report for 2026 for Croatia.

The recommendations are based on the 2026 Rule of Law Report Civil Society Organizations' Joint Submission for Croatia and on civil society monitoring of the implementation of the European Commission's 2025 country-specific recommendations for Croatia. The Joint Submission was coordinated by Human Rights House Zagreb, the Croatian Journalists' Association and the Centre for Democracy and Law Miko Tripalo with contributions from a broad coalition of Croatian civil society organizations and it gives an overview of persistent and emerging rule of law issues in Croatia as seen by civic society organization.

Across All Four Pillars to the European Commission

- Distinguish more systematically between "adopted" and "applied" regulation and monitor the gap between the regulation's entry into force and its effective implementation.

Justice System

- Introduce continuous and specialized training for judges on the European Convention on Human Rights, transitional justice, LGBTQ rights, interacting with persons with specific needs, freedom of expression, SLAPP, environmental law and environmental offences, and public interest to reinforce judicial capacities.
- Establish an effective and transparent mechanism to investigate citizens' complaints against judges for unjustified delays and improper conduct, and make disciplinary proceedings against judges public, after the investigative phase has been completed.
- Make the elections of judges and members of the State Judicial Council more transparent.

- Publish statistics on the duration of proceedings, implement measures to shorten excessively lengthy and ineffective judicial procedures and to make courts accountable for overly long proceedings (e.g. sanctions for exceeding the time beyond the longest prescribed deadlines).
- Reassess the policy of full anonymisation of published judgments so that it does not override the public interest in cases of public importance.
- Involve relevant and interested CSOs and the public in developing action plans for the implementation of concrete ECtHR Judgments and Decisions by submitting the draft plans for E-consultation with the aim of creating the most targeted, high-quality and expedient measures to eliminate and prevent new violations of the Convention
- Strengthen specialisation and continuity within the judiciary and prosecution service in dealing with complex and serious criminal cases, particularly with regard to war crimes and corruption, by establishing specialised teams, ensuring systematic transfer of expertise between generations of judges and prosecutors, and providing continuous training in relevant domestic and international case law.
- Ensure the accessibility, effectiveness and sustainability of the free legal aid system through predictable and adequate multi-annual funding, with funding agreements concluded and initial payments made prior to the start of each implementation period, dedicated support for outreach services in rural and underserved areas, sufficient staffing and continuous professional training of legal aid providers, and independent external monitoring and review mechanisms. Ensure the accessibility of the free legal aid to civil society organisations/environmental defenders as those rarely have in-house lawyer and lacking funding for legal aid.

Anti-corruption framework

- Move beyond technical and textual amendments to the Criminal Procedure Act and the USKOK Act to establish clear, objective and predictable criteria for allocating jurisdiction between USKOK and EPPO, removing the Chief State Attorney's unreviewable discretion over this allocation.
- Amend the Lobbying Act to introduce real-time disclosure of lobbying contacts, and require public officials themselves to disclose their meetings and communications with lobbyists. Introduce the distinction between lobbying for private interest and public advocacy (in the public interest).
- Restore and strengthen the enforcement powers of the Commission for the Resolution of Conflicts of Interest, and insulate its members and decision-making from political interference
- Broaden and simplify whistleblowers' access to free legal aid, scale up psychosocial support into a structured, adequately funded program and assess whether interim protective measures are applied effectively and within statutory deadlines in practice.
- End the practice of letting projects bypass or weaken environmental impact assessment requirements; ensure inspectors' orders for waste removal and environmental remediation are backed by an effective legal protection and enforcement mechanisms, including access to collective judicial redress mechanisms.

Media pluralism and media freedom

- Depoliticise the appointment and dismissal procedure for the future Media Council under the law implementing the European Media Freedom Act: require a qualified parliamentary majority, clear qualification criteria and due-process guarantees for dismissal, as recommended by civil society and media organisations during public consultation.
- Reform the governance of HRT and Hina to guarantee editorial independence, including autonomy over editor-in-chief appointments, and proceed without further delay with reforms currently postponed to late 2026.
- Adopt clear, binding legal criteria for the fair and transparent allocation of state advertising and public funding to media at the local level.
- Ensure the media regulator applies the law on discriminatory content and hate speech consistently and proactively rather than reactively and selectively.
- Complete the Register of Beneficial Owners for media, closing the “silent owner” loophole under the Companies Act, and extend the Media Ownership and Financing Platform to cover the print sector as well as electronic media.
- Finalise the transposition of the EU Anti-SLAPP Directive so that it also covers criminal proceedings, and decriminalise the offences of defamation and insult still used against journalists.
- Reform the Freedom of Information Act to address the systemic problem of administrative silence, which accounts for more than half of the complaints received by the Information Commissioner.
- Strengthen the mechanisms that protect journalistic and editorial autonomy through the consistent application of editorial statutes across all media outlets.

Other institutional issues related to checks and balances

- Move public consultations to the early stages of policy design rather than the final drafting stage, enforce the statutory 30-day minimum consultation period (met by only around 9% of consultations in 2025), and ensure consultation outcome reports are published as legally required.
- Address the backlog in constitutional review so that cases are decided within a reasonable time after the statutory deadline for a decision has expired.
- Resume the substantive functioning of the Government's Council on Human Rights, which remains only nominally in existence, and use it to advance long-standing commitments such as the national human rights and gender equality policies.
- Restore and strengthen the institutional framework for structured and meaningful civil society participation in policymaking, including by reviewing the composition and functioning of the Council for Civil Society Development and adopting and effectively implementing the long-pending National Strategy for the Creation of an Enabling Environment for Civil Society Development, which expired in 2016 and whose adoption was first recommended in 2023.

- Ensure predictable, multi-year and adequately resourced national and EU funding for CSOs; simplify the disproportionate documentation requirements introduced for the ESF calls and later ESF+ calls and speed up verification and reimbursement procedures.
- Publicly and consistently condemn attacks, intimidation and smear campaigns against civil society organisations, human rights defenders and journalists, and ensure that such incidents are investigated with outcomes communicated to the public.
- Introduce public hearings on proposed laws and amendments that citizens show greater interest in.
- Develop and regularly assess the quality of civic space and participatory infrastructure, including the accessibility, inclusiveness and actual influence of civil society participation in policy-making, in line with the EU Strategy for Civil Society and the European Democracy Shield.



Co-funded by the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them.