

PRECARITY AND POLITICAL PRESSURE

**ADDRESSING CHALLENGES UNDERMINING
MEDIA FREEDOM IN CROATIA**

Co-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 European Education and Culture Executive Agency (EACEA). Neither the European Union nor the granting authority can be held responsible for them.



**Co-funded by
the European Union**

This report was prepared by ARTICLE 19 Europe, with contributions from:

- European Centre for Press and Media Freedom (ECPMF)
- European Federation of Journalists (EFJ)
- International Press Institute (IPI)
- Free Press Unlimited (FPU)

Editors: ARTICLE 19 Europe

Design and layout: ECPMF

This report was produced as part of the Media Freedom Rapid Response, which tracks, monitors, and responds to violations of press and media freedom in EU Member States and candidate countries. This project provides legal and practical support, public advocacy and information to protect journalists and media workers. The MFRR is organised by a consortium led by the European Centre for Press and Media Freedom (ECPMF) including ARTICLE 19 Europe, the European Federation of Journalists (EFJ), Free Press Unlimited (FPU), the International Press Institute (IPI), and Osservatorio Balcani e Caucaso Transeuropa (OBCT). The project is co-funded by the European Commission.

MEDIA FREEDOM RAPID RESPONSE



International
Press
Institute



TABLE OF CONTENTS

Abbreviations	4
Executive summary	5
Key findings	5
Key recommendations	6
Introduction	7
Problematic legislation affecting media freedom in Croatia.....	9
Criminal defamation and insult: chilling effect urges repeal	9
Prohibition of judicial information disclosure: new provision must be repealed	10
Media Act: urgent reform needed to comply with EMFA.....	11
Labour law: protections for journalists need to be strengthened	12
Recommendations.....	12
Implementation issues affecting media freedom	13
Weak implementation of Access to Information Act impacting journalists' work	13
Lack of transparency in state advertising	13
Lack of political independence of the media regulatory authority.....	14
Lack of independence of the public service broadcaster.....	15
SLAPPs: ongoing concerns about lack of measures	16
Challenges affecting the safety of journalists in Croatia.....	16
Physical attacks and threats of violence.....	16
Verbal attacks and smear campaigns	17
Gender-based threats to women journalists	17
Threats directed at national minority media.....	17
Government protocols and agreement	18
Recommendations	19

ABBREVIATIONS

AEM	Agency for Electronic Media
CEM	Council for Electronic Media
EMFA	European Media Freedom Act
HDZ	Croatian Democratic Union
HINA	Croatian News Agency
HND	Croatian Journalists' Associations
HRT	Croatian Radio and Television public broadcaster
MFRR	Media Freedom Rapid Response
SNH	Trade Union of Croatian Journalists
SLAPPs	Strategic lawsuits against public participation

EXECUTIVE SUMMARY

This report assesses the state of media freedom in Croatia, shedding light on long-standing and emerging legal, institutional, and societal challenges that undermine media resilience and jeopardise journalists' safety. It provides a detailed analysis of the current situation, examining key issues such as outdated legislation with problematic provisions, the state of public media, hostility towards journalists, economic and political pressures exacerbating precarious working conditions, and barriers preventing access to information.

The findings are based on an online fact-finding mission conducted between 9 and 20 September 2024 by the partner organisations of the Media Freedom Rapid Response (MFRR) consortium. The mission involved meetings with a broad range of stakeholders, including Croatian Government ministries, media outlets, journalists' associations, academics, and civil society actors.

Key findings

- Media law requires comprehensive reform to align it with European standards, particularly the European Media Freedom Act (EMFA). Key areas include ensuring the independence of the public service broadcaster, editorial independence, enhancing transparency in media ownership, and regulating state advertising practices to prevent undue influence.
- The high incidence of SLAPPs (strategic lawsuits against public participation) serving as a tool for intimidating and silencing investigative journalists remains a significant concern.
- Journalists face increasing threats including verbal and physical harassment, smear campaigns, and financial insecurity. Women journalists are particularly vulnerable to gender-specific threats.
- Access to information is severely restricted, further exacerbated by the recent introduction of a new crime punishing disclosure of judicial information.
- The public broadcaster HRT (Croatian Radio and Television) has faced criticism for instances of political interference, including the dismissal of journalists critical of the government and the promotion of content favourable to the ruling party. HRT's credibility is further undermined by its reliance on state funds and by the parliamentary appointment process for its leadership and oversight bodies.
- The Agency for Electronic Media (AEM) and its governing body, the Council for Electronic Media (CEM), lack independence due to political interference.

KEY RECOMMENDATIONS

- **Decriminalise defamation and insult:** Repeal Articles 147 and 149 of the Criminal Code on defamation and insult. Halt all ongoing criminal cases based on these provisions.
- **Repeal criminal prohibition on judicial information disclosure:** Urgently repeal Article 307a of the Criminal Code to protect disclosure and free flow of judicial information. Discontinue ongoing cases under this provision.
- **Reform media law:** Accelerate the drafting and adoption of a new Media Act in line with the EMFA. Ensure a transparent, inclusive consultation process with key stakeholders, including journalist associations and civil society actors, to meet the July 2025 deadline.
- **Strengthen labour protections for journalists:** Improve protections for all journalists, including freelancers, in labour laws. Support collective bargaining agreements, workplace safety mechanisms, and training programmes.
- **Increase transparency in state advertising:** Introduce legal safeguards for transparent and fair state advertising distribution, with mandatory public reporting, enforcement mechanisms, and penalties for non-compliance.
- **Improve access to information:** Enforce timely and comprehensive responses under the Access to Information Act. Strengthen the role of the Information Commissioner and the enforcement of sanctions against public bodies for non-compliance. Train public officials on obligations regarding proactive disclosure and how to handle requests under the Access to Information Act.
- **Strengthen regulatory bodies:** Reform appointment processes in the AEM and its governing body, the CEM, to enhance independence; improve monitoring of media ownership; launch a public ownership register; and implement sanctions for non-compliance with transparency and subsidy criteria.
- **Ensure the independence of the public broadcaster:** Reform HRT leadership appointment processes and funding mechanisms to ensure political independence, transparency, and sustainable financing.
- **Introduce anti-SLAPP measures:** Reform civil defamation laws to include robust anti-SLAPP protections, building on minimum standards set by the EU Anti-SLAPP Directive. Prioritise early dismissal, compensation for victims, and sanctions for initiating abusive lawsuits. Establish and provide specialised training for judges, lawyers, and law enforcement officers on SLAPP recognition, early dismissal mechanisms, and international standards for freedom of expression.
- **Improve journalist safety and law enforcement training:** Train police and the judiciary on journalist safety protocols. Develop internal safety protocols for media organisations in collaboration with unions.

The MFRR partners call on Croatian authorities to prioritise swift and comprehensive reforms to safeguard media freedom and enhance journalists' protection. The mission partners stand ready to provide legal expertise and participate in public consultations on media law reforms, anti-SLAPP legislation, and the implementation of EMFA requirements.

INTRODUCTION

In Croatia, persistent legal and institutional challenges undermine the independence of media outlets, exacerbate journalists' precarious working conditions, and hinder progress towards a free and pluralistic media landscape. Despite repeated commitments by successive governments, these challenges remain unaddressed, fostering an environment where hostility and censorship can thrive, media pluralism is reduced, and trust in journalism is eroded, affecting the free flow of information in Croatia and the public's right to know.

A key barrier is Croatia's outdated Media Act, which has remained largely unchanged since its adoption in 2004. This legislation is ill-equipped to address the challenges of today's rapidly evolving, digitalised media environment. While delays and unsatisfactory draft proposals have stalled reform, the EMFA presents an opportunity for Croatia to align its legal framework with European standards by the July 2025 deadline.

Currently, Croatian legislation fails to meet several EMFA provisions¹, particularly regarding the independence of public service media, transparency in media ownership², editorial independence, and state advertising practices. Urgent reform is needed to address these gaps, strengthen media pluralism, and safeguard editorial independence.

In addition, Croatia's legal framework includes provisions that unduly restrict freedom of expression, enabling powerful individuals to weaponise the law against public watchdogs, particularly journalists. The Croatian Criminal Code still penalises defamation and insult, which are key provisions undermining media freedom. Overly broad and vague provisions enable the prosecution of journalists for any statement deemed 'false'. Criminal prosecution is often coupled with civil lawsuits, creating a double burden that entangles journalists in lengthy and costly legal proceedings. As a result, Croatia has one of the highest numbers of abusive litigation cases, known as SLAPPs, in the EU. Legal threats are routinely used against critics who expose corruption, nepotism, political meddling, and other abuses of power. This creates a climate of fear, hinders journalists in their role as public watchdogs, and significantly restricts access to reliable information that is crucial from a public interest perspective.

Further compounding these challenges, a 2024 amendment to the Criminal Code criminalises the unauthorised disclosure of information relating to criminal investigations. This deters sources from cooperating with journalists, severely hampering investigative reporting and the corroboration of stories.

Journalists in Croatia also face significant political pressure, particularly at the local level, alongside rising numbers of incidents of verbal and physical abuse, smear campaigns, and economic hardship. These challenges hinder their ability to carry out their work and take a toll on their wellbeing.

These growing challenges that remain largely ignored or downplayed fuel frustration among Croatian journalists and journalistic associations but also strengthen their attempts to challenge the status quo. This determination to advocate for meaningful change, combined with distressing statistics on attacks against journalists and warnings from partners on the ground, prompted the MFRR consortium to organise an online fact-finding mission to assess the state of press freedom in Croatia.

This report draws on insights from meetings with key stakeholders, including government ministries, media

1. EMFA, Article 5 on the independence of public service media; Article 6 on transparency of media ownership and editorial independence; Article 22 introducing a media pluralism test for all changes of ownership in the media sector; and Article 25 requiring that all state advertising be distributed in a fully transparent and impartial manner.

2. During the mission, MFRR partners identified the issue of silent owners of the media who are not obliged to be listed as owners in the register of beneficial ownership. This raises issues about the rewarding of concessions for electronic media. In such cases, the CEM requires disclosure of the actual beneficial owners to assess whether any illegal concentration or violation of ownership restrictions has occurred. However, the reality falls short of this, and MFRR partners raised the need to identify silent owners as an integral component to improving transparency in media ownership. See silent partnership legalised by the [Companies Act](#), Chapter III, Articles 148 to 157.

regulators, journalists, and civil society actors, as well as ongoing monitoring efforts. It identifies the most pressing issues: media law reform, restrictive legislation, legal harassment, journalists' safety, transparency in state advertising, public broadcaster independence, and access to information.

The report provides detailed recommendations for key decision-makers in Croatia, outlining a roadmap to address the decline in media freedom and drive essential reforms. The mission partners hope that these insights will contribute constructively to the debate on much-needed improvements. We remain ready to share our expertise in consultations on media law reforms, the implementation of EMFA requirements, and the development of a robust anti-SLAPP law that goes beyond the EU's minimum standards.

The mission was led by ARTICLE 19 Europe and co-led by the European Federation of Journalists in partnership with the Croatian Journalists' Association (HND). Other MFRR partners included the European Centre for Press and Media Freedom, the International Press Institute, Free Press Unlimited, and Osservatorio Balcani Caucaso Transeuropa.

PROBLEMATIC LEGISLATION AFFECTING MEDIA FREEDOM IN CROATIA

Throughout the mission, MFRR found that challenges to media freedom and the protection of journalists in Croatia are rooted in existing problematic laws that have yet to be reformed or repealed, as well as in the introduction of new provisions that disproportionately and unnecessarily restrict freedom of expression. MFRR identified the following issues:

- The criminalisation of ‘defamation’ and ‘insult’ restricts media freedom and freedom of expression.
- Recent criminal sanctions for sharing ‘non-public’ information on criminal cases chill free expression.
- Media law fails to comply with international and European standards such as the EMFA.
- Labour law provides insufficient or weak protection of journalists’ working conditions.

Criminal defamation and insult: chilling effect urges repeal

The Criminal Code of Croatia [penalises](#) ‘insult’ (Article 147) and ‘intentional defamation’ (Article 149), defined as spreading false claims that damage a person’s honour or reputation. While international law permits limitations on free expression to protect reputation, criminal defamation laws are seen as [outdated, unnecessary, and disproportionately harsh](#), especially given alternative remedies such as retractions, apologies, or corrections. A reformed civil defamation law, with anti-SLAPP protections, could effectively address defamatory statements without criminal penalties.

The broad definition of defamation in current Croatian law, punishable by fines and harsher penalties when spread via media without any defence such as reasonable publication or the public interest, creates a significant chilling effect on free expression. The issue is further compounded by ‘double prosecution’³, where journalists face both criminal defamation charges and civil defamation suits from the same plaintiff. This dual burden traps journalists in prolonged and costly legal battles, discouraging reporting on issues such as corruption particularly in the judiciary, abuse of power, and human rights violations particularly at local level and in the context of smaller communities, such as on the islands. Additionally, the ‘insult’ offence, loosely defined and punishable by fines, violates the right to freedom of opinion and contradicts the well-established principle of the jurisprudence of the European Court of Human Rights, which [famously articulated](#) that the right to freedom of expression ‘is applicable not only to “information” or “ideas” that are favourably received or regarded as inoffensive or as a matter of indifference, but also to those that offend, shock or disturb’. International human rights law does not recognise ‘the right’ not to be offended and protects speech that can be subjectively perceived as ‘insulting’. It follows that criminalisation of insult can never be justified by protection of the rights of others.

The existence of the two crimes stands as a core issue for media freedom in Croatia. The MFRR coalition urges the definitive decriminalisation of both defamation and insult, accompanied by substantial reforms of civil defamation, including anti-SLAPP protections.

3. See, for example the cases of [Dražen Ciglencečki](#) and [Davorka Blažević](#).

Prohibition of judicial information disclosure: new provision must be repealed

In 2024, Croatia [introduced](#) a new provision in the Criminal Code (Article 307a)⁴, which criminalises unauthorised disclosure of information about criminal investigations. This provision applies broadly to individuals involved in judicial processes, including law enforcement and legal professionals, banning the disclosure of any investigatory document without authorisation if intended for public release.

The MFRR coalition argues that this law imposes a disproportionate restriction on freedom of expression and public access to information, discouraging lawyers, witnesses, and experts from cooperating with journalists and diminishing coverage of key investigations. In late November 2024, Zagreb's Municipal State Attorney opened [investigations](#) against a journalist on the grounds of 'reasonable suspicion of unauthorized disclosure of investigative or evidentiary actions' as part of the European Public Prosecutor's Office investigation into the 'Beroš–Petrač affair' under Article 307a of the Criminal Code. Although MFRR hopes that the investigations will not result in any charges, we contend that the mere threat of sanctions for journalists reporting information in the public interest, such as healthcare corruption in this case, creates a chilling effect on judicial reporting.

Representatives from the Ministry of Justice have defended the measure as necessary to protect the confidentiality of legal proceedings. However, existing Croatian laws already address breaches of judicial secrecy and professional confidentiality, making this additional provision redundant and excessive. The European Court of Human Rights has consistently [ruled](#) that protecting judicial confidentiality must be balanced with freedom of expression to ensure public accountability in the justice system, which is a pillar of democratic societies. Additionally, under international standards, if information has already entered the public domain, its disclosure should not be criminally penalised. Only disclosures that directly undermine the integrity of the judicial process should be restricted.

MFRR highlights three key issues with the provisions:

- As noted by the [HND](#), the ability of journalists to collect information about criminal investigations by engaging with inside sources and whistleblowers (police officers, prosecutors, lawyers, etc.) has been significantly obstructed, particularly in politically sensitive cases.
- While 'journalistic work' is formally excluded, the term 'journalism' is likely to be interpreted narrowly. This would exclude the work of other actors, such as human rights groups and civil society organisations, who may be engaged in trial observation and thus may perform the public watchdog function of the press. The exception of 'predominant public interest' is undermined by the qualifier of what would constitute a 'predominant' interest of the public. Fear of the selective application of a vague legal term and overall lack of legal clarity will induce relevant actors to err on the side of caution in divulging publicly relevant information about pending cases.
- The resort to criminal law to punish any disclosure of formally 'non-public' information and the unequivocal choice of imprisonment of up to three years as the applicable sanction is not proportionate.

4. Criminal Code, Article 307a states: 'Unauthorized disclosure of the content of investigative or evidentiary action – '(1) A judicial officer or civil servant in a judicial body, a police officer or official, a defendant, a lawyer, a trainee lawyer, a witness, an expert, a translator or an interpreter who, during a previous criminal proceeding that is considered non-public under the law, discloses the content of an investigative or evidentiary document without authorization actions, with the aim of making it publicly available, will be punished by a prison sentence of up to three years.

'(2) Committing, aiding or abetting the criminal offense referred to in paragraph 1 of this article cannot be committed by a journalist.

'(3) There is no criminal offense referred to in paragraph 1 of this article if the offense was committed for the purpose of protecting the victim of a criminal offense, in the interest of the defense in criminal proceedings or in other predominantly public interest.'

The HND has called the provision '[a law of dangerous intentions](#)' and has put out an [open letter](#), co-signed by 18 media outlets, explaining its objections.

MFRR contends that the government should instead explore disciplinary sanctions as a more proportionate alternative for protecting judicial integrity. These sanctions should focus on civil servants and officials, incorporate protections for whistleblowers, and respond directly to the actual impact on fair trial principles, such as judicial impartiality and presumption of innocence.

In conclusion, the MFRR coalition urges the Croatian Government to repeal Article 307a, as it unnecessarily curtails freedom of expression and media freedom.

Media Act: urgent reform needed to comply with EMFA

The current Media Act from 2004 is outdated and has not been able to keep pace with the new media landscape. Journalists' associations such as HND and SNH (Trade Union of Croatian Journalists), as well as civil society, have long called for reform to bring it in line with European and international standards.

Reform was finally announced in early 2022. The Ministry of Culture and Media established a working group of media experts and stakeholders, including publishers, HND, and SNH. However, a draft law was leaked in July 2023 without prior consultation with the working group, leading to the HND raising significant [concerns](#). For MFRR, there are several key issues with the draft:

- Proposals to grant publishers more authority over editorial decisions threaten journalistic independence by enabling owners to suppress content that contradicts their interests, undermining editorial boards and statutes.
- A new selection process for the CEM, based on a simple majority vote, raises concerns about politicisation, compromising the regulator's independence.
- The proposed Council of Media Experts, tasked with overseeing media subsidies and editorial statutes, lacks balanced representation and could erode self-regulation.
- Plans for a national journalist register spark fears of potential government licensing, threatening press freedom.
- Despite the calls for a register of media owners, including beneficial owners, the draft does not include any concrete provisions.

Following the draft's release, MFRR expressed concern over stalled progress on the drafting of a new Media Act and the absence of further working group sessions. Despite the government coalition's commitment to legislate, delays have jeopardised the July 2025 EMFA compliance. In a meeting with the Ministry of Culture and Media, MFRR urged immediate resumption of the reform process. The Ministry assured the coalition that a new draft would be ready by autumn 2024, with the working group reconvened to ensure transparency and stakeholder engagement. However, at the time of writing in early December 2024, MFRR is not aware that any new draft has yet been released. Unofficial information has been shared that a new working group will be formed, though no information has yet been published through the official channels of the Ministry of Culture and Media.

Labour law: protections for journalists need to be strengthened

MFRR highlights that journalists in Croatia, especially those outside full-time employment, face significant challenges due to poor working conditions. While full-time journalists benefit from protections under the Labour Act, many are employed in precarious conditions with low wages, particularly in local journalism. Collective agreements, which could improve conditions, are rare: only the public media outlets HRT and HINA have regularly renewed agreements. Efforts by the HND and SNH to negotiate with private media houses have been met with resistance, hindering collective bargaining and leaving journalists vulnerable.

Freelancers are particularly disadvantaged, with limited recognition under labour laws and a lack of political will to address their needs. Stronger labour legislation is needed to ensure comprehensive protections for all media workers, addressing gaps in collective bargaining and safeguarding their rights.

Recommendations

- 1. Immediately decriminalise defamation and insult:** The government must immediately and definitively decriminalise defamation (Article 149) and insult (Article 147) of the Criminal Code. These provisions are unnecessary and disproportionate and violate the right to freedom of expression. Additionally, the government must discontinue all ongoing criminal cases based on these laws.
- 2. Repeal the criminal prohibition on disclosure of judicial information:** The amendment to the Criminal Code (Article 307a), which criminalises the unauthorised disclosure of information related to criminal proceedings, must be urgently and definitively repealed. This provision imposes disproportionate restrictions on freedom of expression and hampers journalistic reporting on matters of public interest. All ongoing cases based on this provision must be halted to prevent further harm to media freedom.
- 3. Urgently progress the drafting of a new Media Act:** The government must urgently draft and adopt a new Media Act through an inclusive and transparent consultation process with all media stakeholders. The new legislation should align with the EMFA, ensuring robust protections for editorial independence, transparency of media ownership, and the political impartiality of regulatory bodies. Furthermore, the government must ensure that the working group is reconvened and adequately consulted throughout the process to meet the July 2025 EMFA compliance deadline.
- 4. Strengthen labour protections for journalists:** The government must strengthen labour laws to ensure robust protections for all journalists, including freelancers, and support the establishment of comprehensive collective bargaining agreements. It should require media outlets to implement internal safety mechanisms and training programmes to promote journalist welfare and workplace safety.

IMPLEMENTATION ISSUES AFFECTING MEDIA FREEDOM

MFRR identified several issues relating to the implementation of existing laws and practices that are hindering media plurality and independence, protection of journalists, and journalists' ability to impart information to the public:

- Weak implementation of the Access to Information Act hinders journalists' ability to impart public information.
- Lack of transparency in state advertising threatens media plurality and independence.
- Political interference with the media regulatory authority (AEM and CEM) hinders its independence.
- The public service broadcaster (HRT) lacks independence.
- Protections against SLAPPs are missing in civil defamation laws.
- Challenges affect the safety of journalists, including physical attacks and threats of violence, verbal attacks and smear campaigns, and gender-based threats to women journalists and specific threats directed at national minority media.

Weak implementation of Access to Information Act impacting journalists' work

Systemic barriers to access to public information emerged during the MFRR mission as an issue affecting journalists' work in Croatia. Weak implementation of the [Access to Information Act](#) undermines journalists' ability to investigate and report effectively. The mission found systemic issues including delays, refusals, and a lack of accountability among public bodies over denials or lack of response to requests.

Throughout the MFRR mission, journalists reported difficulties in obtaining documents crucial for exposing corruption, mismanagement, and abuses of power. For instance, requests regarding state advertising expenditures often remain unanswered, hindering media efforts to ensure transparency in public spending. Public institutions exploit loopholes or cite confidentiality and data protection to deny access without properly balancing these factors with the public interest of disclosing the requested information, leaving journalists unable to fulfil their watchdog role.

A lack of sanctions issued by the [Information Commissioner](#) – tasked with overseeing the Act's implementation – against public bodies for non-compliance further emboldens institutions to ignore requests. Moreover, appeals to the Information Commissioner are time-consuming and rarely lead to timely resolutions. Investigative journalists, particularly those working on politically sensitive issues, face the greatest challenges, affecting media freedom as well as the public's right to know.

Lack of transparency in state advertising

The lack of transparency and regulation in state advertising practices in Croatia was a significant concern highlighted during the MFRR mission. The absence of rules for the distribution of state funds enables the government to financially reward supportive media outlets and punish criticism, fostering media depen-

dency and compromising journalistic independence. The increasingly widespread practice raises particular concerns under Article 25 of the EMFA, which requires state advertising to be based on transparent, objective, and non-discriminatory criteria. Investigations such as those by [Gong](#) highlight significant sums being allocated by ministries to major outlets, such as Jutarnji List and Vecernji List. However, funds spent by state-owned companies, estimated to be double those of public institutions, remain largely unaccounted for as they do not need to comply with existing reporting requirements. Additionally, media outlets fail to distinguish between paid content and journalism, exacerbating the issue.

At the local level the [problem intensifies](#), with [over 80%](#) of local government advertisements distributed without public tenders. Contracts between local authorities and media often mandate promotional content disguised as editorial material. Examples include the Istrian prefect [Boris Miletic's use of EUR 360,000](#) in public funds for self-promotion.

The broader impact includes compromised editorial independence, particularly where regional and local governments own or influence media outlets. Studies such as those by the [Centre for Media Pluralism and Media Freedom](#) reveal high risks of political interference through non-transparent subsidies and advertising.

The mission found widespread acknowledgement among publishers that they had received state advertising but assertions of limited influence on editorial policies due to the relatively modest sums compared with other revenue streams. However, evidence collected during the mission indicates that media, particularly at the local level, lack safeguards to prevent undue government influence and remain particularly vulnerable.

To address these concerns, the Croatian Government must urgently develop a robust legal framework that ensures state advertising is distributed transparently, equitably, and based on objective criteria to align with principles and rules under the EMFA.

Lack of political independence of the media regulatory authority

The political independence of Croatia's media regulatory authority, the AEM, and its governing body, the CEM, was called into question during the mission. The CEM oversees critical media functions, including broadcast licensing, enforcing standards, monitoring media ownership, and distributing financial grants.

However, the appointment process for AEM's director and CEM board members is politicised as it relies on a parliamentary majority and the recommendation of the Ministry of Culture and Media. This process lacks transparency, clear criteria, and accountability, raising concerns about potential government influence. Stakeholders interviewed during the mission shared that neither rejected candidates nor journalists are informed about the selection rationale, further undermining trust in the regulator's impartiality.

Concerns about the regulator's impartiality have been exacerbated by specific cases. For example, the AEM was [accused](#) of favouring politically connected owners when awarding a broadcast licence to Top Radio. While AEM director Josip Popovac defended the regulator's independence, criticism persists regarding the lack of safeguards in the appointment process and operational transparency.

The MFRR mission identified gaps in oversight and enforcement. The CEM's mandate to monitor media ownership and ensure transparency is hindered by limited enforcement mechanisms. For instance, while broadcasters and state bodies are required to declare income from state advertising, the absence of penalties means that these obligations are often ignored. The CEM's oversight does not include any obligation to identify beneficial owners or track conflicts of interest, although this is mandatory under the EMFA.

Additionally, the AEM oversees subsidies for local digital media worth approximately EUR 20 million annually.

Concerns were raised during the mission about the lack of transparency and criteria in the selection process for grant recipients, as well as the potential for local administrations to exert undue influence; these selection criteria and transparency should be strengthened.

Lack of independence of the public service broadcaster

HRT, the public service broadcaster, operates with financial independence through a household licence fee and commercial advertising. However, the MFRR mission found that its independence is undermined by stagnant funding levels and recent agreements tying it to state budget supplementation, introducing potential government influence. Legally mandated independence from political pressures is compromised by the parliamentary appointment process for HRT's leadership and oversight bodies, which depends on a simple majority vote, enabling political interference.



Croatian Radio and Television public broadcaster (HRT)
Credits: picture alliance / NurPhoto | Jakub Porzycki

HRT was also criticised for censorship, [political favouritism](#), and [alignment with the ruling Croatian Democratic Union](#) (HDZ). Investigative journalism has been sidelined, and numerous [cases](#) illustrate systemic [political pressure](#) and [censorship](#), including dismissals of journalists critical of the government and editorial manipulation favouring HDZ politicians. Scandals involving leadership, such as influence peddling and alleged corruption, have further eroded HRT's credibility.

The mission found that the lack of public trust has pushed audiences towards private broadcasters such as N1 and RTL, which are increasingly viewed as de facto public service providers. Election debates and major political discussions now bypass HRT entirely, reflecting its diminishing role as an impartial platform for public discourse.

MFRR concludes that reform of HRT is necessary to shield its functioning from political interference, particularly from the government and ruling party.

SLAPPs: ongoing concerns about lack of measures

SLAPPs are [widely](#) used in Croatia to intimidate journalists, placing the country among the worst offenders in the EU. The absence of effective anti-SLAPP measures, such as early dismissal, allows cases to extend over years (on average [4.3 years](#)), financially straining journalists and curbing their watchdog role. Minority journalists, especially those working for outlets such as [Novosti](#), are frequent targets. Typical plaintiffs include politicians and businesspeople as well as [judges](#), which makes Croatia an exception. Many cases are brought under civil defamation laws, often involving large claims for damages. The average compensation claim is EUR 9,300, while the average compensation paid is EUR 3,200.

Croatian legislation currently lacks anti-SLAPP provisions. While the Ministry of Justice is leading the transposition of EU Directive 2024/1069 and informed the MFRR mission that it is forming a working group in October 2025 (based on an existing working group that as had limited engagement with the Ministry), there is concern that the Directive's focus on cross-border cases will not sufficiently protect journalists from domestic SLAPPs. At the time of writing in early December 2024, MFRR is not aware that any new draft has been released or the working group reconvened.

Data from [civil society](#) shows approximately 1,333 lawsuits filed against Croatian journalists and media between 2016 and 2023, with an estimated 40% exhibiting SLAPP characteristics. These figures are significantly under-reported by the [Ministry of Culture and Media](#) – a gap which shows the need for better monitoring through qualitative and quantitative data collection by official authorities.

MFRR calls for comprehensive reforms to protect journalists in line with the EU Anti-SLAPP Directive, its recommendations, and the Council of Europe's [recommendation](#) on countering the use of SLAPPs. Key protections – early dismissal mechanisms, victim compensation, and penalties for abusive claimants – should extend to domestic cases. Finally, training and capacity building on SLAPPs are essential to counter the growing issue of judges using legal actions to silence critical reporting.

Challenges affecting the safety of journalists in Croatia

The MFRR mission revealed a troubling landscape for press freedom, characterised by escalating challenges to the safety of journalists. These challenges encompass physical attacks, verbal abuse, smear campaigns, gender-based threats, and specific risks faced by minority media. Collectively, these issues highlight the urgent need for systemic reforms and protective mechanisms to safeguard journalists' rights and ensure a free and independent media environment.

Physical attacks and threats of violence

While physical assaults on journalists in Croatia are relatively rare, the instances that do occur underscore critical gaps in the protective frameworks. One striking example involved journalist [Melita Vrsaljko](#), who was attacked twice in a single week due to her environmental reporting. These incidents exposed flaws in police response and the legal classification of offences. Despite the existence of [protocols](#) aimed at protecting journalists, their inconsistent implementation leaves media workers vulnerable to violence and discourages them from reporting incidents.

Freelance journalists face heightened risks, exacerbated by precarious working conditions and a lack of institutional support. The mission documented cases where threats or physical attacks were inadequately investigated or dismissed as minor offences, further eroding trust in the ability of the legal system to protect media professionals.



Melita Vrsaljko, an award-winning journalist for the Factograph portal and a documentary filmmaker, was attacked at her own home.
Credits: Ivana Grgic/Cropi; Melita's Facebook Page

Verbal attacks and smear campaigns

Verbal abuse, often perpetrated by public officials, [represents the most prevalent form](#) of attack against journalists in Croatia. Eleven alerts have been documented since January 2024 on the Mapping Media Freedom platform, the [majority of attacks](#) involving verbal threats or harassment. Government representatives, including high-ranking officials such as Prime Minister Andrej Plenković, have used public platforms to discredit critical media outlets such as N1, Telegram, and Nacional.

The rise of organised smear campaigns, amplified through social media and alternative news platforms, has further degraded the safety of journalists. For instance, a fact-checking website, Faktograf, became the target of a coordinated campaign initiated by opposition MP Mario Nakić, [falsely accusing it](#) of political bias. The spread of such disinformation undermines public trust in independent journalism and diminishes the professional credibility of targeted reporters.

Gender-based threats to women journalists

Women journalists in Croatia face distinct and often severe threats, including gender-based harassment and intimidation. These challenges are exacerbated by systemic biases and a lack of adequate legal protections. Verbal abuse during press conferences and online harassment campaigns are common, particularly for women reporting on politically sensitive topics such as corruption or abuse of power.

Examples include derogatory remarks made against women journalists during public events, underscoring the pervasive misogyny that complicates their professional environment. Stakeholders emphasised the need for more robust mechanisms to address gender-specific threats and ensure equal protection for all media workers.

Threats directed at national minority media

Media outlets serving national minority communities face unique challenges in Croatia. Political pressure

from far-right groups, such as the Homeland Movement, has intensified, particularly against publications such as Novosti. The Homeland Movement's explicit calls for the defunding of minority media have fuelled a climate of intimidation, leading to self-censorship and reduced editorial independence.

In the run-up to the presidential elections in December 2024, concerns were heightened about the vulnerability of minority media to political manipulation and threats. Stakeholders stressed the importance of preserving the constitutional guarantees that protect the funding and editorial freedom of minority outlets, which play a crucial role in promoting diversity and inclusivity in Croatian media.

Government protocols and agreement

Amid frequent threats to journalists, recent governmental initiatives have sought to address safety concerns. The Ministry of the Interior, the HND, and SNH signed a [Cooperation Agreement](#), complemented by two protocols, aimed at enhancing journalist safety. These measures align with the European Commission's [recommendations](#) for guaranteeing the protection, safety, and empowerment of journalists.

The first protocol, titled 'Actions of the Police and Media Workers at Public Gatherings of Public Interest', outlines responsibilities for both media workers and law enforcement to ensure safe reporting conditions during public events. The second protocol, 'Actions of the Police upon Learning about Criminal Offenses against Journalists and Media Workers', provides a framework for thorough investigations and prompt action in response to threats or attacks.

Some positive steps have been taken towards safety protocols since the MFRR mission, such as in the case of journalist Dario Topić, who was attacked on 4 December 2024 by Osijek Damir Taslidžić while investigating a parking concession dispute. Swift police action was taken and measures imposed. To follow through on this case, MFRR urges the Croatian authorities to complete a [thorough and effective investigation](#) of the attack and bring the perpetrator to justice without delay in accordance with the Croatian Penal Code.

Yet despite these advancements, MFRR found that challenges in implementation persist. For instance, journalist [Melita Vrsaljko's case](#) highlighted gaps in applying the protocols, as her attacks were not classified as criminal offences, excluding them from the established protection mechanisms. Further training for law enforcement and judiciary officials is necessary to bridge these gaps and ensure the effectiveness of the protocols.

RECOMMENDATIONS

- 1. Introduce transparency rules in state advertising:** The Croatian Government must urgently develop a robust legal framework to ensure that state advertising is distributed with transparent, objective, proportionate and non-discriminatory criteria. Mandatory public reporting of advertising expenditures by all state entities and media outlets should be introduced, with effective enforcement mechanisms and penalties for non-compliance. Additionally, contractual practices that mandate promotional content under the guise of journalism should be explicitly prohibited to safeguard editorial independence and media pluralism. Implementing these reforms is essential to align with the principles and rules of the EMFA.
- 2. Implement the Access to Information Act more robustly:** The government must strengthen implementation of the Access to Information Act by ensuring timely and complete responses to all requests. Penalties for non-compliance related to delays or lack of response by public bodies should be effectively enforced as provided for in the Access to Information Act. The role and resources of the Information Commissioner must be expanded to ensure swift handling of appeals and greater oversight of public institutions. Comprehensive training for public officials on transparency obligations is needed to ensure consistent implementation.
- 3. Strengthen the political independence of the AEM and the operational effectiveness of CEM:** The government should reform the appointment process to require pre-selection of board nominees by the Parliamentary Committee for Information, Computerisation, and Media, with final approval requiring a higher majority threshold⁵. Monitoring of media ownership should be improved by identifying beneficial owners in line with Article 6 of the EMFA and conflicts of interest and by launching a public ownership register. Sanctions should be introduced for non-compliance with transparency obligations related to state advertising and ownership declarations. Clear and transparent criteria for awarding media subsidies and independent oversight mechanisms should be introduced to prevent abuse, in line with the EMFA.
- 4. Strengthen the protection of HRT from political influence:** Urgent reforms are required to align HRT with Article 5 of the EMFA, restore its integrity, and protect it from political influence. The appointment and dismissal of HRT's leadership and oversight bodies must adhere to transparent procedures, should consider introducing a form of super majority in order to build consensus across parliament to ensure independence. Funding mechanisms need to be restructured for sustainable, predictable support free from government influence. Reform efforts should involve inclusive public consultations with journalists and media stakeholders.
- 5. Reform civil defamation laws and introduce anti-SLAPP protections:** Croatia must reform its civil defamation laws to include effective safeguards against SLAPPs and other abuses of the legal system. This includes the full and effective implementation of the EU Anti-SLAPP Directive (Directive 2024/1069) and anti-SLAPP recommendations from the Council of Europe. The reforms should prioritise early dismissal mechanisms, protection from excessive damages claims, compensation for individuals targeted by vexatious lawsuits, and sanctions against claimants who abuse the legal process to stifle public interest reporting.
- 6. Provide training and build capacities on SLAPPs:** Comprehensive training should be provided to judges, lawyers, and law enforcement officials on handling defamation and media-related cases in a way that respects freedom of expression. Judicial bodies must be trained to recognise and appropriately dismiss SLAPP cases early in proceedings. Public oversight mechanisms should also be enhanced to ensure transparency and accountability in judicial proceedings.
- 7. Enhanced training for law enforcement:** Authorities should implement specialised training programmes

5. A higher majority threshold means raising the percentage of votes for example to 55 or 60% required to approve the nominations. The exact figure should be decided in consultation with Croatian stakeholders. The purpose is to ensure parliament builds consensus across political parties.

for police officers and judiciary officials to improve their understanding of journalist safety protocols and ensure consistent application of protective measures focused on digital and physical safety. Sufficient funds should be allocated for this purpose.

8. **Internal safety protocols:** Media organisations must collaborate with unions to develop tailored safety protocols, including risk mitigation strategies and emergency response mechanisms.
9. **Addressing gender-based violence:** Specific measures should be introduced to combat gender-based violence against women journalists. This includes the establishment of dedicated reporting mechanisms, targeted legal protections, and awareness campaigns to foster a safer and more inclusive media environment.
10. **Strengthening minority media protections:** Constitutional safeguards for minority media funding and independence must be rigorously enforced to counter political pressure and ensure a diverse media landscape.

MEDIA FREEDOM RAPID RESPONSE



