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CROATIA

Indicators on the Level of Media Freedom and Journalists' Safety Index 2025

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CONTENTS

About the Project	2	
Background of the Indicators	2	
Methodological Note	3	
Qualitative indicators on the level of media freedom and journalists' safety	4	
Journalists' Safety Index	5	
Abbreviations	6	
I Introduction	7	
II Media Freedom and Safety of Journalists in Croatia – Indicators	10	
A. Legal safeguards and their implementation	10	
A.1 Basic guarantees for media and journalists' freedom and their application in practice	10	
A.2 Independence and efficiency of the regulatory authority	12	
A.3 Independence and autonomy of the public service media	13	
A.4 Financial support to quality journalism and media content of public interest	15	
A.5 State advertising in the private media sector	17	
A.6 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	18	
A.7 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely	20	
A.8 The confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities	22	
A.9 Journalists are free to pursue their profession and to establish, join and participate in their associations	23	
A.10 Right to access official documents and information	24	
B. Journalists' position in the newsrooms	25	
B.1 The job positions of journalists are stable and protected at the workplace	25	
B.2 Editorial independence in the private media	27	
B.3 Editorial independence in the public service media	29	
B.4 Editorial independence in the non-profit media sector	30	
B.5 Freedom of journalists in the news production process	31	
B.6 Working position of women journalists	32	
C. Journalists' safety	34	
C.1 Journalists and media actors have access to immediate and effective protective measures when they are threatened	34	
C.2 Journalists and other media actors (whose lives or physical integrity are at real and immediate risk) have access to special protection or safety mechanisms	35	
C.3 Female journalists have access to legal measures and support mechanisms when faced with gender-based threats, harassment, and violence	37	
C.4 The practice of regular public condemnation of threats and attacks on journalists and media has been established	38	
C.5 Police authorities are sensitive to journalists' protection issue	39	
C.6 Specialised investigative units and/or officials are equipped with relevant expertise for investigating attacks and violence against journalists	40	
C.7 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)	41	
C.8 Journalists and other media actors are efficiently protected from various forms of online harassment	42	
C.9 Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently	44	
C.10 Quality statistics collection systems established by state authorities to stem impunity	44	
C.11 Non-physical threats and harassment	45	
C.12 Threats against the lives and physical safety of journalists	46	
C.13 Actual attacks	47	
C.14 Threats and attacks on media outlets and journalists' associations	48	
III Conclusions and recommendations	50	
IV Journalists' Safety Index – Croatia – 2025	54	

About the Project

BACKGROUND OF THE INDICATORS

The journalists' associations from the Western Balkan countries, supported by the European Commission¹, have established the platform [Safejournalists.net](https://safejournalists.net) to jointly monitor media legislation and practice in their countries and engage in advancing the legal and institutional environment in which the journalists and other media professionals work. Every year, based on a carefully designed methodology², the [Safejournalists.net](https://safejournalists.net) partners conduct advocacy research which has provided journalists' associations with evidence-based, reliable, and relevant data on the main problems and obstacles in the implementation of the EU standards in the field of media and journalists' freedom and safety in the Western Balkans. The results of the advocacy research give substance to partners' activities, providing them with new evidence and examples that refine and strengthen their advocacy positions.

The first qualitative research tool – *Indicators on the level of media freedom and journalists' safety*, was first developed in 2016 and gradually fine-tuned over the years. It is composed of three groups of indicators: (A) Legal protection, (B) Journalists' position in the newsroom, and (C) Journalists' safety. Based on this monitoring tool, a total of seven assessments were published, the last one for 2022.

The quantitative research tool – *Journalists' Safety Index*, was developed in 2020 and tested in 2021. It is designed to 'measure' the changes in the environment that have direct or indirect impact

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- 1 In December 2022, the European Commission approved a new three-year cycle of the Project Safejournalists.net, which is a continuation of the previous two phases: the project Western Balkan's Regional Platform for advocating media freedom and journalists' safety (01.2016–12.2018) and Safejournalist.net (02.2020–03.2023). The main objective of the Project is to empower and strengthen the role of the national journalists' associations, members of the Platform Safejournalists.net, to become effective and accountable independent actors in advocating and creating relevant media policies in their countries: Independent Journalists Association of Serbia (IJAS), Association of BH Journalists (BHJ), Croatian Journalists Association (CJA), Association of Journalists of Kosovo (AJK), Association of Journalists of Macedonia (AJM) and the Trade Union of Media of Montenegro (TUMM). The project is funded under the EU Civil Society Facility and Media Programme in favour of the Western Balkans and Turkey for 2021-2023 (IPA III).
 - 2 The advocacy research is designed and coordinated by Snezana Trpevska and Igor Micevski, research fellows of the Research Institute on Social Development RESIS, from North Macedonia (www.resis.mk).

on how safe journalists and other media actors feel when practicing their profession. It is composed of four groups of indicators: (1) Legal and Organisational Environment, (2) Due Prevention, (3) Due Process, and (4) Actual Safety. Based on this tool, a total of three research cycles were implemented: 2020 (pilot year), 2021 and 2022.

Starting from 2023, the [Safejournalists.net](https://safejournalists.net) combined the two (qualitative and quantitative) research tools into one single advocacy research project - *Indicators on the level of media freedom and Journalists' Safety Index*. The platform monitors the situation in seven countries: Albania, Bosnia and Herzegovina, Croatia, North Macedonia, Montenegro, Kosovo³ and Serbia.

METHODOLOGICAL NOTE

The entire research process is divided into two phases: in the *first phase*, data is collected for all qualitative indicators - both for media freedoms and for the safety of journalists, while in the *second phase*, the qualitative indicators for the safety of journalists are converted into quantitative ones and the procedure of scoring and calculation of the Journalists' Safety Index is carried out.

A range of various research methods were applied to collect and analyze data related to each specific qualitative indicator:

- Review of studies, analyses, research reports, policy papers, strategies and other documents;
- Qualitative analysis of legal documents;
- Retrieval and analysis of information published on the web sites of public institutions and other organizations and bodies;
- Retrieval and analysis of press releases, announcements and other information produced by professional organisations;
- Secondary data collected by journalists' associations;
- In-depth-interviews with experts, journalists, policy makers etc.;
- Focus groups with journalists, and
- Surveys with journalists (in some of the countries).

At national level, the advocacy research is conducted by national researchers who carry out the data collection and draft the narrative reports, which were then reviewed by local media and legal experts and by the lead researcher. In Croatia,

3 This name is without prejudice to the status and in accordance with United Nations Security Council Resolution 1244 and the opinion of the Tribunal on the Declaration and Independence of Kosovo.

the Croatian journalists' Association nominated Monika Kutri as national researcher, Đurđica Klancir as media expert, and Vanja Jurić as national legal expert to review the report.

QUALITATIVE INDICATORS ON THE LEVEL OF MEDIA FREEDOM AND JOURNALISTS' SAFETY

The following table presents all qualitative indicators for the level of media freedom and safety of journalists, divided into three areas. These qualitative indicators are presented in descriptive or narrative form. Part of the indicators that are used in the conceptual framework for the Journalists' Safety Index **are marked in red** on the table.

Overview of all qualitative indicators (Indicators on the level of media freedom and journalists' safety)

A. Legal safeguards and their implementation	B. Journalists' position in the newsrooms	C. Journalists' safety
A.1 Basic guarantees for media and journalists' freedom and their application in practice	B.1 The job positions of journalists are stable and protected at the workplace	C.1 Journalists and media actors have access to immediate and effective protective measures
A.2 Independence and efficiency of the regulatory authority	B.2 Editorial independence in the private media	C.2 Journalists and other media actors have access to special protection or safety mechanisms
A.3 Independence and autonomy of the public service media	B.3 Editorial independence in the public service media	C.3 Female journalists have access to legal measures and support mechanisms
A.4 Financial support to quality journalism and media content of public interest	B.4 Editorial independence in the not-for-profit media sector	C.4 The practice of regular public condemnation of threats and attacks on journalists and media
A.5 State advertising in the private media sector	B.5 Freedom of journalists in the news production process	C.5 Police authorities are sensitive to journalists' protection issue
A.6 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	B.6 Economic position of women journalists	C.6 Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists
A.7 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely		C.7 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently
A.8 The confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities		C.8 Journalists and other media actors are efficiently protected from various forms of online harassment
A.9 Journalists are free to pursue their profession and to establish, join and participate in their associations		C.9 Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently
A.10 Right to access official documents and information		C.10 Quality statistics collection systems established by state authorities to stem impunity
		C.11 Non-physical threats and harassments
		C.12 Threats against the lives and physical safety of journalists
		C.13 Actual attacks
		C.14 Threats and attacks on media outlets and journalists' associations

JOURNALISTS' SAFETY INDEX

Taking into consideration the standards and recommendations established by the Council of Europe and other international organisations, the concept of "journalists' safety"⁴ was operationalized by considering the following four dimensions:

- I. **Legal and organisational environment** – the existence and implementation of legal safeguards relevant for the safety of journalists.
- II. **Due Prevention** – the existence and implementation of a range of preventative measures that have direct effects on journalists' protection and safety.
- III. **Due Process** – the behaviour of state institutions and public officials towards journalists and the efficiency of the criminal and civil justice system concerning the investigations of threats and acts of violence against journalists.
- IV. **Actual Safety** – incidents and instances of various forms of threats and acts of violence against journalists and media.

The table below presents the four dimensions and indicators that make up the theoretical model of the "journalists' safety" concept. Data for all these indicators were collected in the first phase of the research, and in the second phase, based on the collected research evidence, nine members of the Advisory Panel from each of the countries⁵ assessed the situation and assigned scores for each of the 19 indicators:

Overview of indicators related to the Journalists' Safety Index

I. Legal and organisational environment	II. Due Prevention	III. Due Process	IV. Actual Safety
1.1 Legal provisions related to defamation and their application do not create a chilling effect on journalists and the media	2.1 Journalists and media actors have access to immediate and effective protective measures	3.1 Specialised units/officers are equipped with expertise for investigating attacks and violence against journalists	4.1 Non-physical threats and harassments
1.2 The confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities	2.2 Journalists and other media actors have access to special protection or safety mechanisms	3.2 Investigations of serious physical attacks on journalists and other media actors are carried out efficiently	4.2 Threats against the lives and physical safety of journalists
1.3 Other laws are enforced objectively and allow journalists and other media actors to work freely and safely	2.3 Female journalists have access to legal measures and support mechanisms	3.3 Journalists and other media actors are efficiently protected from various forms of online harassment	4.3 Actual attacks
1.4 Journalists are free to pursuit their profession and to establish, join and participate in their associations	2.4 The practice of regular public condemnation of threats and attacks on journalists and media	3.4 Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently	4.4 Threats and attacks on media outlets and journalists' associations
1.5 The job positions of journalists are stable and protected at the workplace	2.5 Police authorities are sensitive to journalists' protection issue	3.5 Quality statistics collection systems established by state authorities to stem impunity	

4 Researchers from the RESIS Institute (www.resis.mk), Snežana Trpevska, Igor Micevski and Ljubinka Popovska Toševa developed the [conceptual and methodological framework](#) for the Index and the model for its aggregation, weighting and calculation.

5 Members of the Advisory Panel in Croatia were: Silvija Šeparović, Silvana Uzinić, Marina Karlović Sabolić, Marijana Matković, Paško Bilić, Jasmin Klarić, Vinko Vuković, Damir Kundić i Davor Kustor.

Note: When the male form is used in this report, it always refers simultaneously to female, male and diverse individuals. Multiple designations are omitted for the sake of better readability.

ABBREVIATIONS

AEM – Agency for Electronic Media

AZTN – Croatian Competition Agency

CMPF – Centre for Media Pluralism and Media Freedom

DORH – State Attorney's Office of the Republic of Croatia

DP – Homeland Movement

HDZ – Croatian Democratic Union

CJA – Croatian Journalists' Association

HRT – Croatian Radio and Television

JANAF – Adriatic Oil Pipeline

MFRR – Media Freedom Rapid Response

MPUDT – Ministry of Justice, Public
Administration and Digital Transformation

MROSP – Ministry of Labour, Pension
System, Family and Social Policy

MUP – Ministry of the Interior

NVČ – Journalists' Council of Honour

SDP – Social Democratic Party

SLAPP – Strategic Lawsuits Against Public Participation

TUCJ – Trade Union of Croatian Journalists

AI – Artificial Intelligence

VEM – Council for Electronic Media

Introduction

Croatia is a republic with a parliamentary system and a multi-party political scene, organised according to the principle of the division of power into three branches. It is characterised by a rich historical heritage and pronounced cultural diversity. In addition to the majority Croat population, the country is also home to numerous national minorities such as Serbs, Bosniaks, Roma, Italians and Albanians. With their contribution, these communities have a significant impact on social and cultural life and shape the overall identity of Croatia.

In the last decade, we have witnessed the rapid development of new forms of content publishing, which often have the characteristics of journalism. Podcasts, which are growing every day, as well as blogs, vlogs and various forms of fast, "instant" content, have reshaped the market and changed the way the audience consumes information. Such dynamic development raises a number of legal and ethical issues, among which the problem of defining journalists stands out. According to Article 2.⁶ journalist is "a natural person who collects, processes, shapes or classifies information for publication through the media and is employed by a publisher on the basis of an employment contract or performs journalistic activity as an independent profession, in accordance with the law". However, this legal definition, which has not changed significantly for more than twenty years, does not include new practices such as digital and citizen journalism that have developed in the meantime.

The introduction and wider application of artificial intelligence further complicate this issue. AI is now used to generate news, process data, and personalise content, blurring the lines between human and automated information creation. This opens a new question - whether and to what extent content created with the help of artificial intelligence can be considered journalistic work, and how to fit such practices into

6 [Media Act](#), Narodne novine (Official Gazette), Nos. 59/04, 84/11, 81/13, and 114/22.

the existing legal frameworks. Due to all of the above, there could be legal uncertainty in the future, especially regarding how well the current definition of journalist corresponds to the reality of the modern media space. This is followed by a dilemma about the very definition of media, i.e. which forms of content publishing can be considered a medium in today's technologically transformed environment.

Nevertheless, despite these challenges, the Croatian media landscape can still be described as diverse, with a combination of public and commercial actors. It is home to television, radio, print media, and an increasing number of internet portals and electronic publications. Croatian Radio Television (HRT), as a public broadcaster, plays an important role in informing citizens, but it is often the target of criticism due to its possible political influence on editorial policy. On the other hand, private media are faced with pressures from proprietary interests and market demands. Journalists work in complex conditions, marked by growing pressures on media freedom and an increasing number of lawsuits. While the legislative framework formally guarantees a certain level of media freedom, in practice problems persist in its implementation, as well as in ensuring the safety of journalists on the ground.

When it comes to traditional media, the situation has changed significantly compared to the previous year. On 31.12.2025., there were 713 newspapers registered in Croatia⁷, which represents a significant decrease compared to the situation only a year earlier, when 875 newspapers were registered. Print media have been going through a crisis for a long time. Following Tisak's⁸ announcement in November 2024 on the cessation of press distribution, the Ministry of Culture and Media concluded a contract on the distribution of print media as a service of general economic interest with Croatian Post in June 2025. In parallel, an increasing number of publishers are looking to adapt by moving to digital platforms, developing online editions and subscription models to mitigate the decline in print revenue.

Over the last ten years, there has been a gradual disappearance of sectoral journalism, primarily due to the reduction of newsrooms in which it was no longer possible to employ journalists specializing in certain fields. Such a development is a serious problem because it results in a weaker analytical approach and a lack of expertise in dealing with topics of social importance. When journalists are not focused on specific areas, reporting often remains on the surface, without the necessary context and critical depth. This is especially evident in complex topics such as economics, healthcare, law or science, where there is a simplification of information and a lack of quality interpretation. In addition, the absence of specialised journalists reduces the capacity of the media to effectively monitor institutions and holders of power, thus increasing the scope for corruption and abuse of office.

7 Data obtained on request for the purposes of this research from the Croatian Chamber of Economy.
8 Matea Čelebija, "[Tisak Will No Longer Distribute Newspapers](#)", Index.hr, November 28, 2024.

The decline in the quality of investigative journalism and the lack of detailed analyses have a negative impact on public debate, as citizens do not receive enough relevant information to understand complex social and political processes. Consequently, there is an erosion of trust in the media, which weakens their role in a democratic society in the long run.

In July 2025, the European Commission published its annual Rule of Law Report 2025⁹, which, in its analysis of the media sector in Croatia, highlighted that no significant progress has been made in the area of media pluralism and media freedom. It was particularly emphasised that there is still a lack of concrete measures that would ensure the transparent distribution of state advertising, strengthen editorial and regulatory independence, and provide more effective protection of journalists from abusive lawsuits. The Media Freedom Rapid Response (MFRR) conducted a three-day advocacy mission¹⁰ in May 2025 after they were also on an international mission in September 2024 to assess the current state of media freedom and the safety of journalists in Croatia. The 2025 MFRR report¹¹ assessed that media freedom in Croatia is still under threat: progress is made, but the measures are insufficient and inconsistent. The discrepancy between the optimism of the authorities and the experience of journalists, who continue to warn of threats, poor working conditions and political and economic pressures, is highlighted. The abuse of lawsuits, political influence and non-transparent media financing, which negatively affects media pluralism, remain key problems.

There is no uniform and official data on the total number of journalists in Croatia, which makes it difficult to accurately assess the size and structure of the profession. However, a certain insight can be obtained through data on employees in individual media houses, collected by the Croatian Chamber of Commerce. The Croatian Journalists' Association (CJA) and the Trade Union of Croatian Journalists (TUCJ) play a key role in protecting the rights and professional standards of journalists. Copyright issues of journalists are dealt with by the Society for the Protection of Journalists' Copyright (DZNAP).

For the purposes of this research, a survey was conducted in February 2026 among the membership of the CJA on a sample of 127 respondents. During January and February 2026, 10 interviews with journalists and 5 interviews with editors were conducted. In January 2025, 3 focus groups with women journalists were conducted, with a total of 12 women journalists, 1 focus group with 4 editors and two more focus groups with a total of 10 journalists.

9 European Commission, "[2025 Rule of Law Report – Country Chapter on the Rule of Law Situation in Croatia](#)", Strasbourg, July 8, 2025.

10 Ivica Buljan, "[MFRR Mission: Croatian Authorities Deny the Existence of Problems Regarding Media Freedom and the Position of Journalists](#)", Croatian Journalists' Association, May 21, 2025.

11 Media Freedom Rapid Response (MFRR), "[Reforms Without Protection: The Shrinking Space for Journalism in Croatia – Update Report](#)", June 2025.



Media Freedom and Safety of Journalists in Croatia – Indicators

A. LEGAL SAFEGUARDS AND THEIR IMPLEMENTATION

— A.1 BASIC GUARANTEES FOR MEDIA AND JOURNALISTS' FREEDOM AND THEIR APPLICATION IN PRACTICE

The right to freedom of expression and information in the Republic of Croatia is guaranteed by the Constitution and the relevant legislative framework. Article 38 of the Constitution of the Republic of Croatia¹² ensures freedom of opinion and expression, the right to amend incorrect information, the right to access information and explicitly prohibits censorship. This right covers various forms of public communication, including print and electronic media, public speaking and appearances, as well as the freedom to establish media and other communication platforms. The rights and obligations of journalists and other participants in the public space are additionally regulated by a number of special laws, including the Media Act¹³, the Electronic Media Act¹⁴, the Croatian Radio and Television Act¹⁵, the Croatian News Agency Act¹⁶, as well as certain provisions of the Copyright and Related Rights Act¹⁷. These rules also apply to online portals and digital media, providing a legal framework for journalists and media to operate online. Access to information of public interest is regulated, among other things, by the Right of Access to Information Act¹⁸ and the Media Act, which allow journalists to access data held by public authorities, as well as other entities, such as legal persons with public authority. Although the freedom of expression referred to in Article 38. In practice, the right to access the Internet or its special guarantee is not explicitly stated in the constitutional text.

12 [Constitution of the Republic of Croatia](#), Narodne novine (Official Gazette), Nos. 56/90, 135/97, 8/98, 113/00, 124/00, 28/01, 41/01, 55/01, 76/10, 85/10, and 5/14.

13 [Media Act](#), Official Gazette, Nos. 59/04, 84/11, 81/13, and 114/22.

14 [Electronic Media Act](#), Official Gazette, Nos. 111/21 and 114/22.

15 [Croatian Radiotelevision Act](#), Official Gazette, Nos. 137/10, 76/12, 78/16, 46/17, 73/17, 94/18, 114/22, and 20/23.

16 [Croatian News Agency Act](#), Official Gazette, No. 96/01.

17 [Copyright and Related Rights Act](#), Official Gazette, No. 111/21.

18 [Right of Access to Information Act](#), Official Gazette, Nos. 25/13, 85/15, and 69/22.

In 2025, the Republic of Croatia has not recorded a formal or systematic abolition of constitutional guarantees of freedom of expression and information, nor any direct attempts by state authorities to introduce general censorship or ban media activities through laws or extraordinary measures. However, serious violations and limitations of these guarantees appear in practice, in particular through indirect and structural mechanisms, calling into question the real scope of constitutionally guaranteed rights. Some of the key problems that have been appearing in practice for years are: difficult access to information of public interest, abuse of judicial mechanisms (SLAPP lawsuits), political and institutional pressures on public and local media, and ineffective or slow legal remedies¹⁹. Croatia has a score of 82.50 in the National Cyber Security Index (NCSI)²⁰, which ranks it 32nd, which shows a solid cybersecurity capacity according to the NCSI criteria. According to the Freedom House report²¹, Croatia is rated as a free country with challenges in media independence and pressures on freedom of expression.

During 2025, no new amendments to the basic national media laws were adopted, but certain changes were recorded conditioned by European acts and directives. During this period, the Government of the Republic of Croatia has prepared several bills and amendments that have an impact on the media sector. Among them is the draft law on the implementation of the European Media Freedom Act (EMFA)²², which seeks to align the national legislative framework with European requirements, with the aim of strengthening media pluralism, media independence and regulation of the digital environment. The same Act envisages the transformation of the Agency for Electronic Media into a single regulatory body, with the explanation that such a solution should contribute to greater transparency of financing and ownership structures in the media. In addition, amendments have been made to the rules on political advertising²³, which relate to clearer labelling of political ads and stronger protection of personal data in a political context. At the same time, reforms related to the implementation of the Digital Services Act (DSA) and broader regulation of digital platforms are being considered, which also has important implications for the media landscape and online communication.

However, numerous criticisms from civil society and journalists' organisations point to serious shortcomings in the transparency and inclusiveness of legislative processes. The Croatian Journalists' Association and other relevant organisations warned that the process of harmonisation with EMFA was initiated too late²⁴ and that the public debate was not timely or open enough. At the same time, it is pointed out that the

19 Media Freedom Rapid Response (MFRR), "[Reforms Without Protection: The Shrinking Space for Journalism in Croatia – Update Report](#)", June 2025.

20 e-Governance Academy Foundation, "[Croatia](#)", National Cyber Security Index (NCSI), accessed March 3, 2026.

21 Freedom House, "[Croatia](#)", Freedom House, accessed March 3, 2026.

22 Ministry of Culture and Media of the Republic of Croatia, "[Proposal for the Act Implementing the Regulation Establishing a Common Framework for Media Services in the Internal Market, Incorporating the European Media Freedom Act, Adopted](#)", November 20, 2025.

23 Ministry of Justice, Public Administration and Digital Transformation of the Republic of Croatia, "[New Rules on Political Advertising: Emphasis on Transparency and the Protection of Personal Data](#)", February 5, 2026.

24 Miroslav Edvin Habek, "[EU Media Freedom Act – Government Opens Public Consultation, Croatian Journalists' Association Claims It Is Overdue](#)", HINA, July 13, 2025.

proposed measures are more focused on partial technical issues, while key problems, such as editorial independence and non-transparent media ownership, remain insufficiently addressed. Furthermore, according to reports by organisations such as Media Freedom Rapid Response²⁵, the need to prepare a new Media Act through a transparent and inclusive consultation process involving media stakeholders, journalists' associations and civil society organisations is emphasised. However, such a process has not yet been clearly established in practice. Civil society organisations further warn²⁶ that the long-term blockade and the absence of a new version of the Media Act, after the 2023 draft was withdrawn from the procedure, as well as the lack of real consultations, represent a significant obstacle to the meaningful participation of the sector in shaping the legislative framework. Minister of Culture and Media in September 2024 announced²⁷ the formation of working groups for the drafting of the Media Act, but this process has not yet been completed. In 2025, there were no attempts by state authorities to introduce licensing of print and online media.

— A.2 INDEPENDENCE AND EFFICIENCY OF THE REGULATORY AUTHORITY

The procedure for appointing members of the Council for Electronic Media²⁸ in the Republic of Croatia is regulated by the Electronic Media Act, which prescribes an institutional framework with the aim of ensuring transparency and democracy. The Council has seven members who, at the proposal of the Government of the Republic of Croatia, are appointed and dismissed by the Croatian Parliament, while the law does not provide for a limit on the number of consecutive mandates. Although the procedure is formally clearly defined, in practice the election of members largely depends on the will of the parliamentary majority. The CJA and TUCJ have continuously warned against such a model of appointment, pointing out that the strong influence of the ruling majority can call into question the real independence of the regulatory body. The last changes in the composition of the Council²⁹ took place in December 2024, when Jasna Vaniček Fila, who until then had held the position of Head of the Directorate for Media and Development of Cultural and Creative Industries at the Ministry of Culture and Media, was appointed as a member. On the occasion of this appointment, CJA and TUCJ sent an inquiry³⁰ to the Ministry of Culture and Media, warning of the additional problem of personnel weakening of the already understaffed media sector within the Ministry.

According to the Bill on the Implementation of EMFA, which passed the first reading in the Parliament, the competencies

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- 25 Media Freedom Rapid Response (MFRR), "[Precarity and Political Pressure: Addressing Challenges Undermining Media Freedom in Croatia](#)", January 2025.
- 26 Centre Miko Tripalo and Human Rights House Zagreb, [2025 Rule of Law Report – Civil societies organizations' joint submission – Croatia](#), June 2025.
- 27 HINA, "[Obuljen Koržinek: The Media Act Must Be Adopted, a Working Group Will Be Established Soon](#)", N1 Hrvatska, September 11, 2024.
- 28 Agency for Electronic Media, "[Council](#)", accessed March 3, 2026.
- 29 Government of the Republic of Croatia, [Proposal for the Decision on the Dismissal of a Member of the Council for Electronic Media and Proposal for the Decision on the Appointment of a Member of the Council for Electronic Media](#), submitted to the Croatian Parliament on November 29, 2024.
- 30 Croatian Journalists' Association and Trade Union of Croatian Journalists, "[CJA and TUCJ: Inquiry Regarding the Work of the Media Directorate and the Priorities of the Ministry of Culture and Media](#)", Croatian Journalists' Association, December 10, 2024.

of the Council and the Agency for Electronic Media would be extended to print media, in accordance with the provisions of the Regulation. However, no structured and inclusive public debate has been opened on the possible consequences of such a reform, nor have the criteria, new competencies or accountability mechanisms of such a transformed regulator been clearly defined. In this context, several actors from the journalistic and professional public warned that the extension of regulatory powers without prior reform of the procedures for the appointment of VEM members could further increase the risk of political influence on the media sector and weaken the perception of the independence of the regulatory body.

Concessions for the provision of television and radio media services are awarded through a public tender procedure, whereby the entire process is regulated by a special ordinance that defines the mandatory content and manner of publishing decisions on the granting of concessions. The work of publishers and concessionaires is supervised by the Council for Electronic Media, which is authorised to take measures and impose sanctions in case of violation of the provisions of the Electronic Media Act. Although these procedures are generally carried out transparently and without discrimination, some examples of irregularities in implementation³¹ have been recorded in previous years.

— A.3 INDEPENDENCE AND AUTONOMY OF THE PUBLIC SERVICE MEDIA

Despite the fact that the Croatian Radio and Television Act formally provides for guarantees of the independence of the public service media, in practice this independence has not been fully achieved. The governing bodies of the Croatian Radio and Television are appointed by the decision of the parliamentary majority in the Croatian Parliament, which over the years has led to politically motivated appointments and attempts to influence editorial autonomy. Due to such circumstances, HRT has been cited for a long time in international analyses and reports on the state of media freedom³² as an example of a public service exposed to political pressure and lack of transparency.

According to the assessment of Media Pluralism Monitor³³, Croatia is classified in the category of medium risk in terms of the independence of the public service broadcaster, but it records a very high risk when it comes to the management of HRT. The reason for this is the legislative framework that does not ensure the appointment of the management board protected from political influence, which is manifested in practice through the way the leadership is elected, the Director-General and through changes in the editorial direction. The MFRR report³⁴ also recognises the direct

31 GONG, "[Prevent the Capture of Media by Hidden Owners](#)", September 21, 2021.

32 European Commission, "[2025 Rule of Law Report – Country Chapter on the Rule of Law Situation in Croatia](#)", Strasbourg, July 8, 2025.

33 Paško Bilić, [Monitoring Media Pluralism in the European Union: Results of MPM2025 – Country Report: Croatia](#), Zagreb: Institute for Development and International Relations, July 2025.

34 Media Freedom Rapid Response (MFRR), "[Precarity and Political Pressure: Addressing Challenges Undermining Media Freedom in Croatia](#)", January 2025.

political influence, i.e. the interference of state institutions in the management of HRT, through the politicised process of appointing management bodies by a simple majority in the Croatian Parliament. The independence of HRT has been further weakened by the stagnation of revenues from the fee, which has not changed since 2010, as well as by recent agreements on co-financing from the state budget, which opens up space for an even stronger influence of the government on the programme. While it is necessary to review the long-term sustainability of public service financing, future amendments to the HRT Act will have to take into account EMFA's requirements related to media independence.

The HRT is financed primarily through a mandatory monthly fee paid by all users of television and radio receivers. Although the fee is collected in approximately 95% of cases, the funds raised have long been insufficient for the stable and sustainable financing of the public service broadcaster. The State Secretary at the Ministry of Culture and Media announced³⁵ that during 2025, i.e. within the current mandate of the Government, a new model of financing HRT will be proposed. Such an initiative was not concretised during 2025, nor was a proposal for a new financing system presented. In the midst of serious financial difficulties, HRT has carried out an extensive reduction in the number of workers, with the planned³⁶ layoffs of about a third of the total workforce. By the end of the first quarter of 2025, more than three hundred employees had left HRT. The state monitored this process with measures to take care of redundant employees, but such an intervention, although inevitable, did not lead to a permanent solution to the fundamental problems in the financing system.

Croatian Radio-Television has two bodies in charge of supervising and monitoring its work: the Supervisory Board and the Programme Council. The Supervisory Board consists of five members, with four members appointed by the Croatian Parliament, while one member is elected by HRT employees. This body supervises the financial and business functioning of HRT and monitors the compliance of its work with the provisions of the Croatian Radio and Television Act. The Programme Council consists of eleven members, nine of whom are appointed by the Croatian Parliament through a public call, while two members are elected by HRT employees. The task of the Programme Council³⁷ is to represent the interests of the public and to supervise and improve programme content, including radio, audiovisual and other multimedia services of the public service.

While the Programme Council, according to its role, should hold regular consultations with civil society organisations and other social actors in order to better understand the needs and expectations of the public, in practice such activities are not carried out systematically. An analysis of

35 Siniša Pavić, "HRT Has Fewer and Fewer Licence Fee Payers. A New Public Television Funding Model Is Being Sought, and Several Options Are Being Considered", Novi list, November 4, 2024.

36 European Commission, "2025 Rule of Law Report – Country Chapter on the Rule of Law Situation in Croatia", Strasbourg, July 8, 2025.

37 Croatian Radiotelevision, "HRT Programme Council", accessed March 3, 2026.

the publicly available minutes of the Programme Council shows that no consultations with the civil sector were recorded during 2025, which further calls into question the exercise of its participatory and public function. From the minutes³⁸ and discussions, it can be concluded that there are challenges in practice; one of the members of the Council expressed her impression that the central Dnevnik on HRT is “in accordance with the Prime Minister’s Cabinet” and that it does not serve the development of a democratic society, but “destroys it”. Also, one of the members of the Council “noted that HRT is in a stable environment compared to other public broadcasters in Europe that have similar problems: lack of funding, political pressures, etc.”

— A.4 FINANCIAL SUPPORT TO QUALITY JOURNALISM AND MEDIA CONTENT OF PUBLIC INTEREST

Over the last decade, daily and weekly general information print media in Croatia have been using preferential tax treatment through the application of reduced VAT rates. Daily newspapers published by registered newspaper publishers with recognised status as general news media are taxed at a rate of 5%, while other newspapers, including weeklies and magazines of the same publisher, are taxed at a rate of 13%. While tax breaks are one of the main forms of support, direct state subsidies to print media are not formally envisaged. In February 2025. The Government declared the distribution of print media a service of general economic interest, and in June, after a public tender, the Ministry of Culture and Media concluded a contract with the Croatian Post³⁹ on its provision. Although the competent ministry claims that this has stabilised the distribution system for five years and additionally supported professional journalism, no clear criteria have been established that would distinguish news media from those with predominantly advertising content, nor has it been specified that state aid is directed exclusively to media of public interest.

One of the financing mechanisms is the Fund for the Promotion of Pluralism and Diversity of Electronic Media, managed by the Agency for Electronic Media, which, in accordance with the Croatian Radio and Television Act, is filled with three percent of revenues from the radio and television fee. The funds are allocated through annual public tenders, but some publishers question the transparency and fairness of this process. At the same time, despite the legal obligation prescribed by the Media Act⁴⁰, the state does not conduct regular annual tenders for subsidising media from the state budget. In 2025, the Council for Electronic Media adopted a number of decisions on the allocation of funds from the Fund for the Promotion of Pluralism and Diversity of Electronic Media, which provide insight into how the regulator performs its function of financial support to the media sector. In total, more than 4

38 Croatian Radiotelevision, [Minutes of the 32nd Regular Session of the HRT Programme Council Held on November 7, 2025](#). Accessed February 22, 2026.

39 Ministry of Culture and Media of the Republic of Croatia, [“Contract Signed for the Provision of Printed Media Distribution Services as a Service of General Economic Interest”](#) December 19, 2024.

40 Media Act, Official Gazette, Nos. 59/04, 84/11, 81/13, and 114/22, Article 5.

million euros of public funds have been distributed, with the largest part directed to local and regional television and radio broadcasters, while additional funds have been allocated to electronic publications and independent producers of audiovisual and radio content through Decisions 4/24⁴¹, 5/24⁴² and 6/24⁴³. While such a model formally contributes to the diversity of the media system, the lack of systematic and publicly available recent evaluation of its effects makes it difficult to assess the actual contribution to media pluralism⁴⁴.

The Agency for Electronic Media has set up a centralised platform⁴⁵ with data on media ownership and financing, developed as part of the Recovery and Resilience Plan and in line with the obligations under the European Media Freedom Act. The platform provides the public with insight into ownership structures, sources of financing, state aid, concessions and beneficial owners of the media, with the possibility of searching by media and individuals. Although it represents an important step forward in transparency, the database is currently limited to electronic media and partial data on public advertisers, so its real value will depend on further completion, the introduction of clearer categorisations and the implementation of obligations and sanctions that will be prescribed by the law on the implementation of EMFA.

Media information in the languages of national minorities primarily relies on funds allocated through public calls of the Council for National Minorities. The holders of these activities may be minority institutions, associations or members of minorities themselves, with the aim of providing access to information in their mother tongue, with financial support from national, regional and local budgets, in particular for radio and television content intended for minority audiences. During 2025, the Council supported⁴⁶ 105 news programs, while the Agency for Electronic Media, through the Fund for the Promotion of Pluralism and Diversity of Electronic Media, additionally finances content intended for national minorities. At the same time, the Constitutional Act on the Rights of National Minorities guarantees the presence of minority topics and languages in the program of the Croatian Radio and Television, which is operationalized by the agreement between HRT and the Government of the Republic of Croatia. However, in her report for 2025, the Ombudswoman reiterated the recommendation already made to HRT⁴⁷ "to increase the share and frequency of programmes on national minorities, to include it in the programmes of the general programme to a greater extent and

41 Agency for Electronic Media, "[Decision Adopted on the Allocation of Funds from the Fund for the Promotion of Pluralism and Diversity of Electronic Media No. 4/24](#)", April 10, 2025.

42 Agency for Electronic Media, "[Decision Adopted on the Allocation of Funds from the Fund for the Promotion of Pluralism and Diversity of Electronic Media No. 5/24 – Large-Value Grants](#)", April 3, 2025.

43 Agency for Electronic Media, "[Decision Adopted on the Allocation of Funds from the Fund for the Promotion of Pluralism and Diversity of Electronic Media No. 6/24](#)", April 25, 2025.

44 VEM conducted a public procurement process to select an agency to carry out an effectiveness analysis of the Fund, with the last analysis of the Fund having been conducted for the period 2016–2019.

45 Agency for Electronic Media, "[e-Media – Media Ownership and Sources of Media Financing](#)", accessed March 10, 2026.

46 Council for National Minorities, "[Decision on the allocation of funds](#)" to be provided in the State Budget of the Republic of Croatia for the needs of national minorities in 2025, Official Gazette 73/2025.

47 In earlier reports of the Ombudswoman, it was pointed out that there was a lack of staff capacities in the newsroom for national minorities. In its statement to the Ombudswoman, HRT stated that during 2025, due to the business consolidation plan, there was no employment, but cooperation with journalism students from the Faculty of Political Science was initiated in order to increase the number of journalists who follow the topics of national minorities and at the same time involve young people in the work of the newsroom. [Ombudswoman's Report: Analysis of the Situation of Human Rights and Equality in Croatia in 2025](#), p. 184.

to regularly use minority languages in programmes intended for national minorities".⁴⁸ Council for National Minorities 2025 reduced funding for the weekly Novosti⁴⁹ by about 35%, from €610,000 to €400,000, and the same amount was maintained in 2026⁵⁰, despite an increase in the overall budget for cultural programmes. The decision was made after the political demands of the party of the ruling coalition of the Homeland Movement for cutting or abolishing funds to Novosti, which is why criticism was sent from the editorial board and some journalists' associations about politically motivated interference in the financing of the media of national minorities. Based on the Ombudswoman's Report for 2025⁵¹, Novosti found out⁵² which texts published in 2024 resulted in their funds being reduced.

— A.5 STATE ADVERTISING IN THE PRIVATE MEDIA SECTOR

In Croatia, there is a practice of state advertising, which is regulated by laws⁵³. However, there is still a lack of clear and fair criteria for the distribution of state advertisements to the media. Unclear award criteria, poor reporting and a blurred line between promotional and journalistic content threaten editorial independence, while complex administrative requirements further hamper transparency. The announced legislative changes related to the implementation of the European Media Freedom Act have yet to show an impact, and the recommendations on a fair and transparent distribution of funds remain unimplemented.

As a rule, state authorities publish data on the part of the funds they direct to the media, but this data often does not include all funding from public sources. At the same time, public and state-owned companies also finance the media, but information about these allocations is often not published because they refer to business secrets, while marketing agencies involved in the distribution of funds are additionally absent from the transparency system. At the local level, some media also receive non-financial support, such as covering overhead costs or providing space, which is not recorded as public support and remains outside the official records. Although the Electronic Media Act prescribes the obligation to allocate 15% of the marketing budgets of public authorities to local media, the implementation of this obligation remains non-transparent because most institutions do not submit complete data, which is also evident in the reports of the Council for Electronic Media. The 2025 *Rule of Law* report states that "No progress has yet been made in strengthening the legal framework and oversight mechanisms to ensure a fair and transparent distribution of state advertising funding at national, regional and local levels", despite one of the recommendations in 2024 being for Croatia to "further work on strengthening the legal framework and oversight mechanisms to ensure a fair and transparent

48 [Ombudswoman's Report](#): Analysis of the Situation of Human Rights and Equality in Croatia in 2025, p. 184.

49 Nenad Jovanović, "[Punishing Novosti](#)", Portal Novosti, April 24, 2025.

50 Nenad Jovanović, "[Punishing Novosti and Programmes Targeted by the Far Right](#)", Portal Novosti, May 8, 2025.

51 [Ombudswoman's Report](#): Analysis of the Situation of Human Rights and Equality in Croatia in 2025, p. 175 and 176.

52 Nenad Jovanović, "[40 Articles for Which Novosti Were Punished](#)", Portal Novosti, April 29, 2025.

53 Public Procurement Act, Media Act, Electronic Media Act, Budget Act and Right of Access to Information Act.

distribution of state advertising funding on the national, regional and local levels, including public procurement procedures.

— A.6 LEGAL PROVISIONS RELATED TO DEFAMATION AND THEIR APPLICATION DO NOT CREATE A CHILLING EFFECT ON JOURNALISTS AND THE MEDIA

The Criminal Code of the Republic of Croatia elaborates on the criminal offences of insult and defamation, whereby it precisely defines their elements and prescribes the reasons for excluding unlawfulness for the criminal offence of insult, including situations in which journalists act in the public interest or for other justified reasons (Art. 148a of the Criminal Code). In such circumstances, even if the information is detrimental to one's reputation or honour, criminal liability does not arise. In defamation, the burden of proof lies with the private prosecutor, who must show that the journalist knowingly made an untrue factual claim, since defamation refers exclusively to facts, not value judgments. If the conditions for defamation are not met, the court is obliged to consider whether the elements of the criminal offence of insult have been met. Although the Criminal Code does not provide for special treatment for state officials, the practice of the European Court of Human Rights is based on the view that politicians must suffer a wider scope of criticism than private individuals, because they are exposed to increased public scrutiny. The decision on liability is made taking into account the specific circumstances of the case, and the prescribed sanctions are financial – up to 180 daily amounts for insult and up to 500 for defamation, where the amount of the penalty is determined according to the financial status of the perpetrator, the severity of the violation and the motives for the act.

Nevertheless, in practice, it is often pointed out that criminal sanctions are not proportionate to the actual gravity of these acts and that disputes against journalists should primarily be resolved in the civil law framework, while criminal prosecution should be an exception, reserved for the most serious cases. This attitude is confirmed by the Council of Europe's Safety of Journalists platform⁵⁴, which warns that journalists in Croatia, according to the existing practice related to insult and defamation, do not have a sufficient level of protection.

Defamation is often difficult to prove, while a significant part of proceedings against journalists and the media relate to insult. Currently, there is no complete and precise data on the total number of such lawsuits or on the identity of their claimants. Every year, the CJA conducts a survey⁵⁵ on all court proceedings against the media and journalists⁵⁶, the results of which show that the number of lawsuits is decreasing over the years⁵⁷. Nevertheless, there is a trend

54 European Federation of Journalists, "[Journalists Lack Adequate Protection under Current Draft Media Law](#)", Council of Europe Platform to Promote the Protection of Journalism and Safety of Journalists, September 6, 2024.

55 Monika Kutri, "[CJA: At Least 696 Active Lawsuits Worth €3.1 Million](#)", Croatian Journalists' Association, May 1, 2025.

56 The most recent survey for 2025 was not completed at the time of writing this report.

57 The survey shows smaller numbers every year, but it is not clear whether active advocacy of journalists' associations or some other variable contributed to this. From the survey itself, the same sample should be drawn for a period of 8 years and a longitudinal analysis should be made, in order to be able to talk more precisely about the results of the survey.

of relatively high initial damages claims in civil proceedings for damage to honour and reputation, which may indicate pressure on the media and a potential deterrent effect on freedom of expression. The real extent of legal pressure remains difficult to estimate until complete and representative data from the entire media scene is collected.

The data that the MPUDT submits to the CJA every year upon request, as well as CJA surveys, show that the number of lawsuits is decreasing over the years. It is important to emphasize that since 2018, CJA has continuously been publicly warning and informing the public about the number of lawsuits and reacting to every significant case, especially when it comes to SLAPP lawsuits against journalists. It is possible that it is precisely such systematic public pressure and awareness raising that has contributed to the gradual reduction in the number of lawsuits.

Journalists have different experiences – while some believe that defamation laws do not discourage them from working, others warn of their strong deterrent effect on investigative and critical journalism. Some journalists have been threatened with lawsuits or initiated court proceedings leading to self-censorship, especially in cases of reporting on powerful individuals or institutions, and the so-called ‘serial plaintiffs’ known for filing lawsuits against journalists and the media. Fear of high claims for damages and lengthy court proceedings often results in caution or abandonment of publishing potentially sensitive topics, especially in cases of non-profit and local media that objectively do not have the means to finance legal representation or defence. In this context, certain court proceedings are perceived as a means of pressure and intimidation of the media, which can have a negative impact on freedom of expression and the public’s right to information.

A total of 119 respondents answered the survey question⁵⁸ on the impact of the criminal offence of defamation on professional work, and the results indicate a marked polarisation of attitudes. 21.8% of respondents state that it has no or only minimal influence on their work, while the same share believes that it has an extremely strong impact. A further 21.0% estimate that it has a partial impact, and 13.4% of respondents say that it has a significant impact on their work. This distribution of responses suggests that the criminal justice framework, although formally not a dominant factor for all journalists, represents a relevant source of pressure and a potential incentive for self-censorship for a significant part of them. At the same time, the fact that almost half of the respondents do not perceive a strong influence indicates an uneven experience within newsrooms, which may depend on the type of media, employment status and topics covered by journalists. At the panel dedicated to SLAPP lawsuits, journalist Goran Gazdek⁵⁹ pointed out that the position of journalists is especially demanding in smaller and local communities, where plaintiffs

58 The survey was answered by journalists covering a variety of topics, not only those dealing with demanding investigative subjects.

59 Ivica Buljan, ["Round Table: The Biggest Problem of SLAPPs Is Lengthy Litigation and the Exhaustion of Defendants"](#), Croatian Journalists' Association, January 28, 2026.

are often part of the everyday environment. According to him, such circumstances further intensify the feeling of pressure, including threats and continuous harassment, which can have long-term professional and personal consequences.

— A.7 OTHER LAWS ARE ENFORCED OBJECTIVELY AND ALLOW JOURNALISTS AND OTHER MEDIA ACTORS TO WORK FREELY AND SAFELY

In the Croatian legal system, there is still no special legal framework for protection against SLAPP lawsuits, primarily because the concept of SLAPP itself is not formally defined in the applicable legislation⁶⁰. Despite this, in recent years, a number of initiatives have been launched aimed at limiting their misuse. In 2021, the Ministry of Culture and Media established an Expert Working Group⁶¹ that brings together representatives of the media, judicial and academic sectors with the aim of developing policies to combat SLAPP procedures. As part of this work, targeted trainings for judges on SLAPP lawsuits and the specifics of journalistic work were conducted, whereby, according to the Ministry, five workshops have been held so far in different parts of Croatia. The National Plan for the Development of Culture and Media for the period 2023-2027 includes a measure to establish a mechanism for the early identification and dismissal of manifestly unfounded lawsuits, which should be incorporated into the new Media Act, while in May 2025 an educational brochure intended for judges and lawyers was presented as a transitional tool until the full application of European legislation. At the European Union level, in 2024, the European Parliament adopted the Directive on the protection of journalists and activists against SLAPP claims, which obliges member states to introduce mechanisms for the early dismissal of unfounded actions and sanctioning abuse of the right to sue. At the same time, an analysis of 1,333 court verdicts⁶² conducted by the Croatian Journalists' Association and the Centre for Democracy and Law "Miko Tripalo", covering the period from 2016 to 2023, showed that more than 40 percent of completed cases contain at least one SLAPP indicator, while in more than half of these cases there are more such indicators.

The Municipal State Attorney's Office in Split has filed an indictment⁶³ against journalist Danka Derifaj, cameraman Petar Janjić and tenant representative Branko Miodrag for entering the roof of the building where singer Marko Perković has an apartment, which, according to the tenants and the journalist's report, is used as a private space, although it is supposed to represent a common part of the building. They are charged with the criminal offence of violating the inviolability of the home, whereby the indictment does not specifically

60 Saša Paparella, "[SLAPPs in Croatia – Lengthy Court Proceedings and Legal Uncertainty](#)", Croatian Journalists' Association, September 29, 2024.

61 Ministry of Culture and Media of the Republic of Croatia, "[Expert Working Group for the Development of Policies to Combat SLAPP Lawsuits](#)", accessed March 8, 2026.

62 Centre for Democracy and Law Miko Tripalo, "[Strategic Lawsuits Against Public Participation \(SLAPPs\) in the Republic of Croatia](#)", accessed March 8, 2026.

63 TRIS, "[Criminalisation of Journalistic Work: Is the State Attorney's Office Protecting Thompson's Interests Rather Than the Public Interest \(?\)](#)", TRIS – Independent News Portal, August 15, 2025.

emphasise that it is about acting during journalistic work and recording a topic of public interest. The case has attracted significant attention because it is a rare situation in which the state attorney's office prosecutes journalists for actions related to the performance of professional tasks. The concern stems from the broader context of the relationship between criminal law and journalistic freedom. Namely, a part of the professional public warned that criminal prosecution in such situations can have a so-called chilling effect on journalists, because criminal law instruments are used in circumstances that could otherwise be resolved through civil disputes or regulatory mechanisms. It is particularly controversial that the indictment is based on the concept of the inviolability of the home, even though it is a space that is the subject of a dispute between the co-owners of the building and which has already been the subject of a public debate. That is why CJA views this case primarily through the prism of the protection of public interest and media freedom, and not necessarily as proof of the existence of a hidden political background. A key question that arises is where the line lies between the protection of privacy and the right of journalists to investigate topics of public importance, especially when it comes to the use of common property and potential irregularities.

On November 7, 2025, the Municipal Court in Zadar found journalist Melita Vrsaljko guilty of disturbing public order and sentenced her to the same penalty as her attacker, even though she was physically attacked in Nadin in July 2024 while reporting on illegal waste dumping. The attacker tried to prevent her from filming, verbally and physically attacking her, which was confirmed by witnesses, video footage and his confession, but the court concluded that both sides were equally responsible. A day later, the journalist was attacked again, this time in her own home, by the daughter of the same man. In the meantime, an indictment has been filed at the Municipal Court in Zadar against Ivan Vrsaljko for coercion against a person performing tasks of public interest and against Iva Perić for threats, referring to the same events from the summer of 2024. According to the indictment, the motive for the attack was to prevent the journalist from working and intimidate her. It is notable that less than a month passed between the indictment and the first-instance misdemeanour verdict, and the misdemeanour proceedings established the same guilt of the journalist and the attacker. The journalist's lawyer filed an appeal against the first-instance verdict.

In 2025, we did not record the initiation of new multiple lawsuits against journalists. However, disputes initiated in previous years are still ongoing. The data⁶⁴ indicate that court proceedings are extremely lengthy. Civil cases that end in a final judgment last on average around 4.3 years, while the average duration of all proceedings, including those ending with the withdrawal or dismissal of a lawsuit, is around 3.6 years, which shows that the difference in duration is not

64 Centre for Democracy and Law Miko Tripalo, "[Strategic Lawsuits Against Public Participation \(SLAPPs\) in the Republic of Croatia](#)", accessed March 8, 2026.

significant. When it comes to criminal proceedings, despite the unavailability of precise statistical data, individual examples indicate that the finality usually occurs only after 3 to 5 years, and sometimes after 7 years. Such slowness of the system means long-term uncertainty, financial burden and the risk of rising costs and interest rates for media and journalists.

— A.8 THE CONFIDENTIALITY OF JOURNALISTS' SOURCES IS GUARANTEED IN THE LEGISLATION AND RESPECTED BY THE AUTHORITIES

Under the current legislative framework⁶⁵, journalists are not obliged to disclose the identity of their sources, apart from exceptional situations where the overriding public interest in disclosing the source would outweigh the need to protect it. In practice, this right is generally respected, and journalists regularly refer to legal provisions on the protection of sources. Although the Media Act formally recognises the protection of sources, it does not provide for all the procedural mechanisms required by the European Media Freedom Act (EMFA) for this protection to be fully effective and sustainable, especially in the context of possible surveillance or use of spyware (MFRR).

Nevertheless, the 2024 amendments to the Criminal Code have raised additional questions regarding the indirect protection of sources. Of particular concern is Article 307a⁶⁶, which provides for criminal liability for the unauthorised disclosure of the content of reconnaissance or evidentiary actions during non-public preliminary criminal proceedings. Although this provision does not formally refer to journalists, its scope covers a number of actors – including officials, defendants, lawyers, witnesses and other participants in the proceedings – who in practice may be potential whistleblowers or sources of information for the media. As a result, there are concerns that such a legal solution could have a deterrent effect on sources and indirectly restrict investigative journalism, media freedom and the public's right to information.

Pressures on journalists to disclose sources of information persist, especially within the media outlets themselves, where tensions sometimes arise between publishers or management, editors-in-chief and journalists over the boundaries of editorial responsibility and source protection. Such pressures are rarely discussed publicly, making it difficult to assess their true frequency and magnitude. In relation to the police, the State Attorney's Office and the courts, requests to disclose sources appear rarely; as a rule, journalists invoke the legal right to protect sources, which institutions generally respect. Journalists mostly state that they do not have major difficulties in establishing contact with sources of information or in maintaining these relationships, but some of them still point to certain obstacles and challenges. Although they sometimes encounter caution or fear from sources of possible consequences,

65 Ministry of Justice, Public Administration and Digital Transformation of the Republic of Croatia, "[Criminal Code](#)", accessed March 8, 2026.
66 [Criminal Code](#), Official Gazette 125/11, 144/12, 56/15, 61/15, 101/17, 118/18, 126/19, 84/21, 114/22, 114/23, 36/24, 136/25.

they point out that they find ways to communicate safely and protect the identities of their interlocutors.

— A.9 JOURNALISTS ARE FREE TO PURSUIT THEIR PROFESSION AND TO ESTABLISH, JOIN AND PARTICIPATE IN THEIR ASSOCIATIONS

In Croatia, in accordance with the applicable legislation, journalists are not obliged to have a licence to perform journalistic work. Following the proposal presented in the working document of the new Media Act, which the Ministry of Culture and Media sent to the Croatian Journalists' Association in July 2023, proposing the introduction of a register of journalists and photojournalists, CJA warned⁶⁷ that such a solution could open up space for state control over the profession and jeopardise journalistic independence. During 2024 and 2025, there were no more public debates on this proposal or further attempts to introduce it.

As a rule, journalists do not have any difficulties with confirming their professional status, which they most often prove with the card of the Croatian Journalists' Association or the identification documents of their editorial offices. On December 31, 2025, Chief State Prosecutor Ivan Turudić refused to give a statement to N1 television, although he was addressing other media present at the same time. According to reporter Katarina Plantak, the N1 crew was prevented from filming just before the start of the statement, with the explanation that the statement was agreed in advance, while other media companies were filming without obstacles. In addition, other journalists were told that the statement would not be given if N1 was present, which indicates selective and discriminatory treatment of a particular media. However, 22.8% of respondents in the survey answered that they used to have a problem that they were prevented from reporting.

During 2025, there were no formal or direct pressures that would prevent journalists from joining professional or trade union organisations. Despite this, some media owners and publishers still view such engagement with reservations, especially when it comes to the Trade Union of Croatian Journalists, which is sometimes perceived as an act of resistance or provoking existing relations. In addition to the Croatian Journalists' Association (CJA) and the Trade Union of Croatian Journalists (TUCJ), there are also several smaller, thematically or professionally oriented associations in Croatia that bring together journalists according to their field of work or specific interests. These organisations do not have the role or capacity to replace the CJA or TUCJ in the comprehensive representation of the rights and interests of journalists.

67 Croatian Journalists' Association, "[CJA: Draft Working Version of the New Media Act Is Unacceptable](#)", Croatian Journalists' Association, July 19, 2023.

— A.10 RIGHT TO ACCESS OFFICIAL DOCUMENTS AND INFORMATION

Interviewed journalists and focus group participants state that they use all available mechanisms to get information, but point out that access to information is often difficult. Whether institutions provide the requested information depends to a large extent on the assessment of potential reputational or political risk: in some cases, information is provided without reservation, while in others access is systematically difficult. Journalists from local communities especially emphasize that they more often receive answers from the national level than from local institutions, from which they sometimes do not receive any response. Due to the large differences in the experiences of respondents, it is not possible to draw a clear conclusion about the patterns of behaviour of individual institutions. 125 respondents responded to the survey question on general satisfaction with the deadlines within which public authorities respond to journalists' inquiries. 12% said they were completely or almost completely satisfied, 44% were neither satisfied nor dissatisfied, while the same proportion of 44% said they were almost or not satisfied at all. When asked about their satisfaction with the quality of the replies of the officials in charge of communication with journalists, 125 respondents also answered: 12% expressed complete or almost complete satisfaction, 40.8% took a neutral stance, and 47.2% stated that they were mostly or not at all satisfied. When it comes to the time it takes for institutions to respond to queries (121 respondents), 66.9% say they wait a few days for answers, 24% a few weeks, while 9.1% say they never get answers.

As a rule, the government and ministries do not maintain an open, non-discriminatory and equal attitude towards the media. Journalists point out that preferential treatment is often given to media close to the government, while the quality of communication depends on the sensitivity of a particular topic, but also on the ministry with which they communicate. The experiences of journalists in this field are different and there is no uniform practice. While some courts are transparent and open to the media, others show a significantly lower level of accessibility. Some institutions regularly publish information publicly, while others do not. Journalists also point out that the quality of communication with courts and other institutions sometimes depends on personal contacts and acquaintances within these bodies. The work of the Parliament is open to the public, but journalists need official accreditation to monitor and report. Plenary sessions are broadcast live on Parliamentary Television, the fourth channel of the Croatian Radio and Television, as well as on the official website of the Parliament and its YouTube channel.

B. JOURNALISTS' POSITION IN THE NEWSROOMS

— B.1 THE JOB POSITIONS OF JOURNALISTS ARE STABLE AND PROTECTED AT THE WORKPLACE

In accordance with the Labour Act⁶⁸, journalists employed in the media should have an employment contract, either for an indefinite period of time or for a definite period, whereby the fixed-term contract may not last longer than three years. Despite this, a large proportion of journalists work outside the standard employment relationship, most often as freelance journalists or freelance associates, which means that they are not covered by the full scope of labour protection. Although newsrooms employ journalists with employment contracts, media outlets also rely heavily on external associates hired through copyright contracts or other non-standard forms of work, which do not provide the same level of security and rights.

Precise data on the ratio of employed journalists to those working on other bases are not publicly available, since they are available exclusively to employers⁶⁹. However, from many years of analysis and experience of professional organisations, it is evident that the number of full-time journalists is continuously decreasing, while the number of so-called forced freelancers is growing. Poor working conditions, low wages and precarious employment relationships discourage young people from working in the media, while encouraging experienced journalists to leave the profession. Especially in digital media and portals, non-standard and precarious forms of work have become the dominant model, which further deepens the uncertainty within the journalistic profession. The use of artificial intelligence in the work of the media, especially on portals, without clearly set rules, is intensifying, and this often undermines the integrity of journalistic work. Also, there are more and more different forms of so-called native advertising forms and promotional texts in which journalists are forced to participate due to fear for their existence. In this way, journalistic work and advertising are mixed, and this undoubtedly undermines the value of journalism and weakens the profession. The working conditions of journalists in Croatia vary significantly between media outlets, primarily depending on their size, type of media and financial stability. These differences also affect the problems that journalists face in their daily work. For years, financial difficulties have dominated non-profit media, while in other newsrooms, the key challenges are the disturbed working atmosphere and the lack of appropriate technical equipment. On HRT, some journalists expressed dissatisfaction because they claim that, after refusing to act contrary to the code of ethics, they are being moved to less visible tasks and removed from the most watched shows.

Young journalists often start their careers with low salaries and limited opportunities for advancement, and additional difficulties are created by precarious forms of employment

68 [Labour Act](#), Official Gazette 93/14, 127/17, 98/19, 151/22, 46/23, 64/23.

69 Data obtained upon request from the Trade Union of Croatian Journalists.

and pressure from employers. According to a CJA survey conducted in February 2026, 13.6% of journalists receive a salary of less than 500 euros, 12.8% between 501 and 1000 euros, 40% between 1001 and 1500 euros, 24% between 1501 and 2000 euros, while 9.6% have an income of more than 2000 euros. Data from the Trade union of Croatia show that the average salary is around 1,300 euros, with large differences between editorial positions and reporter journalists, while salaries in local media are usually below average⁷⁰. Although most journalists receive their salaries regularly, since the law prescribes payment no later than the 15th of the month for the previous month, exceptions are recorded every year.

The situation at HRT⁷¹, which was publicly discussed at the end of 2024, where a large number of employees had incomes lower than or close to the legal minimum, is particularly worrying. Although journalists usually do not belong to this group, the functioning of the public service also depends on other media professionals who participate in the creation of the programme. HRT then announced⁷² a reduction in the number of employees by about 30% in order to optimise operations. By March 31, 2025, 333 employees, or 12%, had left HRT, who had terminated their employment contracts with severance pay by mutual agreement. Most departures were recorded in the programme and technology. The severance payments were financed from the state budget, with clearly defined conditions and a maximum amount. Trade union representatives and some employees opposed the consolidation plan, warning of uncertainty and the lack of a clear vision for the development of the public broadcaster.

The year 2025 for N1 in Croatia was marked by a restructuring⁷³ within which employment contracts were terminated for a significant number of employees – including experienced journalists, changes within the ownership structure of the publisher, United Media, and a reduction in the volume of the news programme due to the reduction in the number of employees. On July 11, 2025, it was announced that Al Jazeera Balkans was ceasing to broadcast, and the employment contracts of the entire newsroom, which brought together numerous journalists who significantly contributed to information pluralism in Croatia, were cancelled in Zagreb. Layoffs were also recorded at Nacional news portal and on August 1, 2025, Radio Nacional stopped broadcasting – which left 12 professionals unemployed, and the CJA claimed that this was “another proof of the failure of media policy in Croatia.”⁷⁴ In the print media, there has also been a trend of actively encouraging experienced journalists to take early retirement with the announcement of a possible part-time engagement

70 Ibid.

71 Nacional.hr, “[Hungry, Humiliated, Exhausted: Prisavlje on the Brink of a Strike. Sever: ‘The Situation at HRT Is Unsustainable’](#)”, Nacional, December 11, 2024.

72 Nacional.hr, “[Alarming Collapse: ‘Obuljen Koržinek Has Changed Nothing at HRT Except That a Thousand People Will Soon Lose Their Jobs’](#)”, Nacional, January 2, 2025.

73 N1 Croatia, “[N1 Croatia Announces Business Reorganisation to Ensure Sustainability and Future Development](#)”, N1 Croatia, January 20, 2025.

74 Croatian Journalists’ Association, “[CJA: The Closure of Radio Nacional Is Further Evidence of the Failure of Croatian Media Policy](#)”, Croatian Journalists’ Association, July 30, 2025.

with retirement. It is a model that undoubtedly puts journalists in a subordinate position to the editorial board or publisher.

The last available survey on atypical workers in the media dates back to 2022⁷⁵, when the Trade Union of Croatian Journalists analyzed the position of freelancers and freelancers on a sample of 135 respondents. It turned out that 53.3% of respondents were highly educated, but with low incomes: 34.1% earned between HRK 4,000 and 8,000 (€530 - €1060), and 31.1% up to HRK 4,000 (€530), which means that almost two-thirds were below the average salary at the time. As many as 38.5% worked for more than a year on copyright or similar contracts, while for 29.6% it was the only form of employment. Social insecurity is pronounced: 33.3% cannot solve the housing issue, 32.6% cannot plan a family, 70.4% do not have the conditions for a loan, and 65.9% estimate that they will not receive a full pension.

Trade unions also operate in private media, and the Trade Union of Croatian Journalists has established branches in 21 media outlets in Croatia⁷⁶. The very fact that there are trade union branches in some newsrooms indicates that media owners formally allow trade union organising. However, according to the experience of trade union representatives, trade union membership is often perceived in practice as a form of resistance or a kind of protest by employees. When it comes to collective agreements that protect the labour rights of journalists in private media, their number has decreased significantly. Out of the former eleven collective agreements that the TUCJ had concluded at the level of individual media houses, only three are in force today – in the Croatian Radio and Television, the Croatian News Agency (HINA) and Novi list, with the collective agreement of Novi list subsequently amended with annexes. There is still no branch or national collective agreement for journalists. In order to rekindle social dialogue, contacts with the Croatian Employers' Association have been renewed with the aim of opening negotiations on a possible national and/or branch collective agreement.

— B.2 EDITORIAL INDEPENDENCE IN THE PRIVATE MEDIA

In accordance with Article 26. of the Media Act⁷⁷, private media are obliged to adopt the Media Statute, which regulates the relations between publishers, editors-in-chief and journalists, with a clear definition of their rights and obligations. Possession of the statute is also a condition for the use of various forms of state and public support, including funds from the Fund for the Promotion of Pluralism and Diversity of Electronic Media. All electronic media registered in the Register of Electronic Media at the Agency for Electronic Media must

75 Trade Union of Croatian Journalists, "[Research on Atypical Work in the Media Sector](#)", Trade Union of Croatian Journalists, December 27, 2022.

76 Upon request for the purposes of this research, data on the number of trade union branches and collective agreements were obtained from the TUCJ.

77 [Media Act](#), Official Gazette 59/04, 84/11, 81/13, 114/22.

have a statute, as well as print media that want to exercise the right to a reduced VAT rate on printed publications.

Although such statutes are formally mandatory, there is no single, publicly available overview of their content, as they are usually internal acts of employers. Based on the experience of trade unions and professional organisations, it can be concluded that in certain media, especially those with collective agreements or more developed editorial rules, statutes contain provisions that declaratively protect editorial autonomy and emphasise the independence of journalistic work from ownership, management or marketing interests, referring to professional and ethical standards. However, as statutes are not publicly available and there are no prescribed sanctions for violating them, their implementation in practice remains poorly monitored, which opens the door to deviations from the established rules.

Private media outlets rarely have their own codes of ethics and mostly rely on the Code of Honour for Croatian Journalists⁷⁸. The Journalists' Council of Honour, which is the only body for self-regulation of the media sector in Croatia, has been operating within the CJA since its establishment in 1910 and is in charge of monitoring the implementation of the Code of Honour of Croatian journalists. In some of the previous surveys, the codes of ethics of HRT and Večernji list were publicly available, however, in the last few years, none of these documents can be found on their websites. Anyone who suspects a violation of the Code of Honour can file a report with the Journalists' Council of Honour, which then decides on these cases. The number and frequency of reports indicate a weaker respect for ethical standards in Croatian journalism, which is also evident from the report on the work of the Council of Honour⁷⁹. Although the decisions of the Council of Honour do not have the legal authority of court verdicts, they are often considered by the courts as a significant and reliable source of information.

One of the most striking examples of political pressure on the media in 2025 refers to the reduction of public funding of the weekly Novosti⁸⁰. After the formation of the coalition government of the HDZ and the Homeland Movement, earlier political announcements about cutting funds came true: the Council for National Minorities reduced the financing of Novosti by about 35% compared to the previous year, making this media the only minority publisher with such a significant cut.

The influence of advertisers on editorial boards should not be ignored either. The influence of state-owned companies through advertising arrangements was noted in the Gong survey⁸¹, but while the advertising of state-owned companies and institutions in private media can be partially monitored through the obligation to publish data, there is no obligation to

78 Croatian Journalists' Association, "[Code of Honour of Croatian Journalists](#)", Croatian Journalists' Association, accessed March 8, 2026.
79 [Report on the work of the Journalists' Council of Honour for 2025](#).
80 Iva Boban Valečić, "[DP Received HDZ's Guarantee: Novosti to Receive 40 Percent Less Funding](#)", Večernji list, December 5, 2024.
81 Saša Paparella, Oriana Ivković Novokmet, and Melisa Skender, "[State Financing Without Clear Criteria – A Tool for Media Censorship?](#)", Zagreb: GONG, 2022.

publish records of the largest private advertisers in the media, according to the latest publicly available research on media pressures⁸² It is private advertisers and various advertising arrangements with publishers that have significantly influenced the editorial policy in private media, i.e. the lack of monitoring of certain topics related to the largest advertisers. The influence of large advertisers on editorial boards in private and public media in Croatia undoubtedly exists, but there is no new research on this topic, and it is difficult to estimate their intensity.

— B.3 EDITORIAL INDEPENDENCE IN THE PUBLIC SERVICE MEDIA

The Croatian Radio and Television has adopted a Code of Ethics for journalists and creative staff, and there is also an Ethics Committee within the house authorized to give opinions on possible violations of the code. However, the interviewed journalists question its composition because two members come from the ranks of the editors of the news program who are proposed by the editorial board of that program, which in practice means that the editors-in-chief appoint their associates to the committee. Although the participants of focus groups and interviews point out that they personally adhere to professional rules, they state that there are also those in the newsroom who do not respect them.

The Ordinance on the Internal Organization of HRT from 2015, which is currently not available on the new official website (but only in an archived version⁸³), does not provide a clear delimitation of responsibilities for individual functions. The general director of HRT still has a decisive influence on the appointment of editors. Although the Statute could provide for the participation of journalists in the process of selecting editors, the current statute⁸⁴ of the public service broadcaster does not oblige them to participate in voting. According to the testimonies of the interviewed journalists, the legal provisions that regulate these issues are often not respected in practice.

The most common forms of government pressure on newsrooms and individual journalists at HRT are not manifested through open bans or direct orders, but through structural and management mechanisms. A key channel of influence is the way management, director-general and editorial positions are appointed through political processes, which creates a long-term framework in which editorial autonomy is limited. Pressures are also manifested through personnel decisions, shifts to less visible tasks, marginalization of research content and editorial interventions in politically sensitive topics. Additional influence stems from the public broadcaster's financial dependence on state decisions and the broader regulatory framework, which creates a permanent political context in which newsrooms operate.

82 Durdica Klancir, [Who and How Pressures Journalists: From Politicians to Advertisers](#), Zagreb: GONG, 2021.

83 Croatian Radiotelevision, [Rules on the Internal Organisation of Croatian Radiotelevision](#), accessed January 31, 2026.

84 Croatian Radiotelevision, [Statute of Croatian Radiotelevision](#), Zagreb: Croatian Radiotelevision, December 2012.

In the past year, there has not been a single specific case⁸⁵ of direct political pressure on newsrooms or journalists, primarily because the influence of politics on HRT does not appear sporadically, but as a long-term and institutionalized pattern. Such influence is visible through the way key editorial and management positions are appointed, but also through the work environment in which self-censorship becomes a common survival strategy. Instead of open orders, structures are maintained that allow for subtle but permanent control over editorial processes. In its 2025 report⁸⁶, the MFRR further warned against the perception of favouritism by the ruling party on HRT.

Although individual cases, such as the long-running court dispute with journalist Hrvoje Zovko, continue to point to problems of political interference and pressure, the key challenge remains the fact that HRT has had a hard time fulfilling the role of an independent public broadcaster for a long time. Therefore, the absence of one striking incident in the past year does not mean that pressures do not exist, on the contrary, it points to their normalisation and systematic presence, which in the long run poses a serious risk to independent journalism.

— B.4 EDITORIAL INDEPENDENCE IN THE NON-PROFIT MEDIA SECTOR

As of 31 December 2025, there were no non-profit television media services operating in Croatia, while 18 non-profit radio services, 152 non-profit electronic publications, 20 media services distributed via satellite, cable and internet, and four non-profit on-demand media services were recorded⁸⁷. Non-profit media, as a rule, do not have separately adopted codes of ethics, but rely on the Code of Honour of Croatian Journalists in their work. These are mostly very small newsrooms in which the same employees perform several different jobs. The level of adherence to the Code of Honour in non-profit media varies from newsroom to newsroom and from individual journalist to another, but in most cases professional standards are respected.

Pressures on non-profit media in Croatia continue to be manifested primarily through the restriction or denial of funding. As there is no developed system of civic donations for the media, a large number of non-profit newsrooms rely on project funds from local and regional authorities and state institutions. Although such sources are formally available, journalists in non-profit media are often forced to devote a significant part of their time to project administration instead of journalistic work, which calls into question the long-term stability and sustainability of these media. An additional and increasingly present form of pressure is SLAPP lawsuits, which continue to frequently affect non-profit media in Croatia, exposing

85 Marius Dragomir, "[Croatian Radio Television \(HRT\)](#)", in State Media Monitor Global Dataset 2025, Media and Journalism Research Center, September 6, 2025.

86 Media Freedom Rapid Response (MFRR), "[Precarity and Political Pressure: Addressing Challenges Undermining Media Freedom in Croatia](#)", January 2025.

87 Data obtained upon request from AEM.

them to serious financial risk due to limited resources for legal defence and disproportionately high claims for damages.

— B.5 FREEDOM OF JOURNALISTS IN THE NEWS PRODUCTION PROCESS

Journalists in Croatia generally have the freedom to choose topics and aspects of the story that will be emphasized. When asked how much freedom they have in their work to choose the topics they work on, the majority of respondents stated a high level of autonomy: 75.6% believe that they have complete or almost complete freedom, 17.3% take a neutral stance, while 7% of respondents point out that there is almost no or no freedom. Similar results were recorded when asked about the freedom to decide which aspect of the story will be highlighted: 81.8% of respondents state complete or almost complete freedom, 11.1% do not assess that they have or do not have freedom, and 7.2% consider that they are mostly or completely limited in this regard. Various factors can affect the work of journalists, but respondents most often emphasized personal values, their own beliefs and professional journalistic ethics as the most important influences. On the other hand, religious beliefs, expected profits, and marketing attitudes were rated as the least relevant to their work. When it comes to external actors, the majority of journalists stated that media owners do not have a significant influence on their daily work, and they similarly assessed the influence of politicians, for whom the vast majority of respondents also pointed out that they do not influence their professional work.

The experiences of journalists included in interviews and focus groups show certain differences. A significant number of them do not report cases of censorship, either because they are not sufficiently familiar with the procedures, or because they want to avoid administratively demanding procedures. Some participants emphasize that censorship manifests itself through increased content control and restrictions at press conferences, where the editorial board determines in advance what questions they are allowed to ask. The findings of the 2021 survey also point to the presence of censorship in the Croatian media space, with an increasingly pronounced internal control of information within newsrooms. Attitudes towards self-censorship are not uniform, while some journalists admit that they resort to it to avoid conflicts with more influential actors, others point out that they consciously oppose it. In such situations, the level of support they receive from editors, colleagues in the newsroom or the media company itself often plays a crucial role.

When asked about exposure to pressures on copyright freedoms, 3.9% of respondents state that they encounter such pressures frequently, 75.6% occasionally, while 20.5% have never been exposed to such situations. More than half of the respondents (57.9%) point out that they are completely independent in the choice of topics and the way they are processed, while 23.8% state that the editorial board must approve access to the topic and interlocutors. Furthermore, 10.3% are more likely to work on topics commissioned by

the editorial board, and 7.9% say that the editorial board suggests topics, but the journalist has the right to refuse to work on them. Respondents cite editors (31.9%), followed by politically exposed people (25%), publishers (12.9%) and marketing departments and advertisers (11.2%) as the most common actors restricting copyright freedoms.

— B.6 WORKING POSITION OF WOMEN JOURNALISTS

Women journalists generally work in the same or very similar conditions as their male counterparts, but in doing so they are exposed to additional challenges such as sexism, violence and various forms of discrimination in the workplace. Their salaries are often lower than those of journalists, reflecting deeper-rooted gender inequalities within the media sector. In addition, women are more likely to find themselves in precarious forms of employment and have fewer opportunities for professional advancement and career recognition⁸⁸.

In Croatia, women journalists hold editorial positions in large numbers, seemingly on an equal footing with men. However, such an overall picture does not fully reflect the challenges that still exist in terms of their professional advancement. Focus group participants from print media point to the presence of gender discrimination in certain newsrooms. They state, for example, that men are often given priority in post-traineeship recruitment, even when women journalists are equally or better qualified. They also point out that in some newsrooms, the so-called “softer” sections, such as culture, are more often entrusted to women, while “harder” sections, such as city politics or daily news, are predominantly assigned to men⁸⁹. Some of the journalists involved in the focus group reported experiences of sexual harassment, which range from inappropriate physical touching without consent to sending messages and photos of sexual content. According to them, the perpetrators are most often colleagues with whom they work professionally, while the victims are usually younger women.

A survey by the Trade Union of Croatian Journalists⁹⁰ shows a serious lack of institutional protection of journalists and media professionals. Only 44.91% of the media in which these journalists work have internal documents on how to deal with cases of assault and harassment, while 37.50% implement preventive measures and 58.80% do not undertake any preventive activities. 28.70% of respondents experienced physical attack, 13.89% experienced the threat of physical violence, and 12.50% experienced the threat of death, with the perpetrators most often being interlocutors or persons they reported on. Discrimination on the basis of sex or gender was experienced by 43.98% of respondents, and 43.52% stated violations of labour rights, most often

88 Interviews and focus groups.

89 Interviews and focus groups.

90 A study by the Trade Union of Croatian Journalists conducted within the framework of the project ‘Ending Workplace Harassment from the Media Industry’, carried out in Croatia by Emil Čančar and Dr. Dina Vozab; the survey was conducted on a sample of 216 media workers and journalists in the second half of 2025; 7 interviews were conducted with journalists, as well as 3 interviews with experts. The data for the purposes of this analysis were taken from a draft report and a PowerPoint presentation, as the final national research report was not publicly available at the time of writing.

the right to a contract (48.94%), salary (35.46%) and working hours (34.04%). More than half of the respondents (52.31%) were exposed to discrediting campaigns, while 36.94% experienced sexist comments. Sexual harassment in verbal or non-verbal form was reported by 26.85% of respondents, and 38.89% by inappropriate physical touching, with colleagues and superiors being frequent perpetrators. Most cases remain unreported, especially sexual assaults (84.52%), due to distrust in institutions (46.48%), fear for the job (45.07%) and normalisation of violence (38.03%). The interviews further confirm poor working conditions, widespread discrimination, daily harassment, and fear of stigmatisation and lack of protection when reporting violence.

C. JOURNALISTS' SAFETY

— C.1 JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES WHEN THEY ARE THREATENED

Journalists can report threats and attacks to the police under the same conditions as other citizens. There is no specialised unit in the police system dedicated exclusively to the protection of journalists. Depending on the nature of the hate speech, the report can be submitted to the Council for Electronic Media⁹¹, the competent ombudsperson institutions (such as the Ombudswoman⁹², the Ombudswoman for Gender Equality⁹³, the Ombudsperson for Persons with Disabilities⁹⁴ or the Ombudswoman for Children⁹⁵) and the Journalists' Council of Honour⁹⁶ for CJA. In cases where hate speech involves public incitement to violence or intolerance, criminal proceedings are conducted by the State Attorney's Office of the Republic of Croatia.

During 2025, the police registered⁹⁷ 19 cases in which journalists were victims of crimes related to the performance of journalistic work, with a total of 23 criminal offences against 23 journalists or media professionals recorded. The most frequently recorded criminal offence was Threat, with a total of 12 cases, followed by Coercion against a person performing tasks of public interest or in public service with 7 cases, while 2 criminal offences of Unauthorised Use of Personal Data, 1 criminal offence of Intrusive Behaviour and 1 criminal offence of Damage to Other People's Property were also recorded. Out of a total of 23 criminal offences, 10 of them have been resolved and the perpetrators have been reported. In one case, the perpetrator is known but not available to the Croatian authorities, while in one case, the identity of the perpetrator is known, but the police investigation is still ongoing. The overall resolution coefficient is 43.50%, not including the two cases.

The criminal offence of Threats was committed to the detriment of 12 journalists, of which 4 were female and 8 male journalists. Out of these 12 criminal offences, 4 cases were resolved, which gives a resolution coefficient of 33.3%. Threats were most often sent through social networks (6 cases), followed by phone (2), while individual threats were recorded through communication applications, e-mail, in person and through damage to someone else's property. The second most common criminal offence in 2025 was Coercion against a person performing tasks of public interest or in public service. Out of a total of 7 registered cases, 6 of them were resolved, with a resolution coefficient of 85.7%, which represents a significantly higher level of efficiency of treatment in relation to criminal offences of threats.

91 Agency for Electronic Media, "[Council](#)", accessed March 8, 2026.

92 [Ombudswoman of the Republic of Croatia](#), accessed March 8, 2026.

93 [Ombudswoman for Gender Equality](#) of the Republic of Croatia, accessed March 8, 2026.

94 [Ombudsperson for Persons with Disabilities](#) of the Republic of Croatia, accessed March 8, 2026.

95 [Ombudswoman for Children](#) of the Republic of Croatia, accessed March 8, 2026.

96 Croatian Journalists' Association, [Rules of Procedure of the Journalists' Council of Honour](#), accessed March 8, 2026.

97 The data was provided by the police, upon request, for the purposes of this survey.

According to the information available to the Croatian Journalists' Association, the Ministry of the Interior acted on all received reports from journalists during 2025. As in previous years, however, difficulties arise in the phase of further proceedings before the State Attorney's Office, which often refuses to take over cases in order to initiate proceedings ex officio, explaining that the reports do not contain the characteristics of a criminal offence.

— C.2 JOURNALISTS AND OTHER MEDIA ACTORS (WHOSE LIVES OR PHYSICAL INTEGRITY ARE AT REAL AND IMMEDIATE RISK) HAVE ACCESS TO SPECIAL PROTECTION OR SAFETY MECHANISMS

Journalists, like all other citizens, continue to have access to police protection in cases of threat, including the possibility of applying special personal protection measures in accordance with the Police Affairs and Powers Act. The Cooperation Agreement⁹⁸ between the Croatian Journalists' Association, the Trade Union of Croatian Journalists and the Ministry of the Interior, signed in September 2023, as well as the two related protocols: the Protocol on Police Conduct in Cases of Crimes Against Journalists⁹⁹ and the Protocol on Public Gatherings of Public Interest¹⁰⁰, continue to represent an important institutional framework for the protection of journalists.

Compared to 2024, when serious problems in the application of the protocol were recorded, including cases of physical attacks on journalist Melita Vrsaljko that were qualified as misdemeanours and not criminal offences¹⁰¹, during 2025 there was also one incident¹⁰² at a public gathering in Benkovac that was also aimed at journalist Vrsaljko. According to information from the police, the protocol related to the conduct of public gatherings of public interest was applied once, on November 8, 2025, in the area of the Split-Dalmatia Police Department, during a gathering of a fan group on the Riva, where there were no reports to the detriment of journalists.

Unlike in 2024, when the Working Group for Monitoring the Implementation of the Protocol identified the need for additional education and informing media and police professionals about the existence and application of the Protocol, the year 2025 was marked by concrete advances in this area. The Police Directorate, in cooperation with the Ministry of Culture and Media, continued with the implementation of educational activities started at the end of 2024. By the end of 2025, a total of six one-day workshops were conducted in the editorial offices of the largest media houses in Croatia, in which more than 180 journalists, editors

98 Ministry of the Interior of the Republic of Croatia, Croatian Journalists' Association, and Trade Union of Croatian Journalists, [Cooperation Agreement](#), Zagreb: September 22, 2023.

99 Ministry of the Interior of the Republic of Croatia, Croatian Journalists' Association, and Trade Union of Croatian Journalists, [Protocol on Police Conduct upon Learning of a Criminal Offence Committed Against Journalists and Other Media Workers in the Performance of Their Professional Duties](#), Zagreb: September 22, 2023.

100 Ministry of the Interior of the Republic of Croatia, Croatian Journalists' Association, and Trade Union of Croatian Journalists, [Protocol on Police Conduct and Cooperation with Journalists and Other Media Workers During Public Gatherings of Public Interest](#), Zagreb: September 22, 2023.

101 Petar Vidov, "Police Circumvent the Law and Refuse to Sanction the People Who Attacked a Journalist from Klimatski Portal and Faktograf", Faktograf, July 22, 2024.

102 SafeJournalists Network, "Actual Attacks on Journalists: Melita Vrsaljko, Benkovac, August 22, 2025", 2025.

and other media professionals directly participated, while a larger number of employees was indirectly involved.

At the same time, specialised training for police managers was conducted as part of the working meeting of the line of work of the basic police and security services, which was attended by 30 managers from all police departments. Training for police officers is planned and continues during 2026. Compared to 2024, when problems in the implementation of the protocol were more pronounced, 2025 shows some progress in terms of education and awareness, although the actual effectiveness of the protocol will still have to be monitored through practice and concrete cases.

In the Republic of Croatia, there are several legal acts in force that regulate risk assessment procedures to determine special protection needs, but these mechanisms are not specifically or exclusively aimed at journalists. Thus, Article 99. of the Police Affairs and Powers Act¹⁰³ stipulates that the police, when there are justified reasons for doing so, "shall protect the victim and another person who provides or can provide significant information for the criminal proceedings or is a close person who is in danger of the perpetrator or other persons related to the criminal proceedings". Witness protection in criminal cases is regulated by the Witness Protection Act¹⁰⁴, according to which the Attorney General may propose the inclusion of a vulnerable person in the Protection Programme in situations where free and unhindered testimony cannot be ensured in any other way. Journalists, just like other whistleblowers, have the right to judicial protection, protection in accordance with the prescribed procedures for reporting irregularities, compensation for damage caused and protection of identity and confidentiality of data. The Whistleblower Protection Act¹⁰⁵ explicitly stipulates that it is prohibited to obstruct the reporting of irregularities.

In cases of attacks or threats directed against journalists, the Croatian Journalists' Association acts in accordance with its powers and available capacities, addressing the competent authorities and institutions. Through the Centre for the Protection of Freedom of Expression, CJA cooperates with lawyers to provide journalists with free legal aid. A special form for reporting attacks and threats to journalists is also available on the CJA website, while a similar form exists on the Croatian version of the Safe Journalists platform, which further facilitates the recording and monitoring of cases of threats to journalistic freedoms.

103 [Police Affairs and Powers Act](#), Official Gazette, Nos. 76/09, 92/14, 70/19, and 155/23.

104 [Witness Protection Act](#), Official Gazette, Nos. 163/03, 18/11, and 56/13.

105 [Whistleblower Protection Act](#), Official Gazette No. 46/22.

— C.3 FEMALE JOURNALISTS HAVE ACCESS TO LEGAL MEASURES AND SUPPORT MECHANISMS WHEN FACED WITH GENDER-BASED THREATS, HARASSMENT, AND VIOLENCE

The implementation of the Istanbul Convention in Croatia took place gradually through the adoption of new laws, amendments to existing regulations and the adoption of special protocols. After the signing of the Convention in 2013, its ratification in 2018 marked the beginning of full implementation, with the adoption of the Law on the Ratification of the Istanbul Convention, which laid the foundations for the systematic prevention of violence against women and domestic violence. This framework has been further strengthened by the National Strategy for Protection against Domestic Violence 2017-2022, as well as by a number of specialised protocols regulating the treatment of cases of sexual violence, domestic violence and the integration of victims of trafficking in human beings. Since 2020, stricter criminal sanctions and measures for more efficient prosecution of perpetrators have been introduced, and employees of the social welfare and education systems have been granted official status in the relevant laws. The Free Legal Aid Act additionally ensures the availability of primary and secondary legal aid to all victims of violence. In a report published in September 2023, the GREVIO¹⁰⁶ expert group recognized Croatia's significant efforts in implementing the Convention, highlighting certain areas that require further clarification and improvement.

Cyberharassment is not standardised separately, but can be reported to the police and is procedurally dealt with under existing harassment provisions. The Criminal Code¹⁰⁷ defines sexual harassment as a crime against sexual freedom, encompassing any unwanted verbal, non-verbal or physical behaviour of a sexual nature that violates the dignity of a person or creates an intimidating, hostile or humiliating environment. In addition to criminal law mechanisms, the Croatian legal system also provides for misdemeanour sanctions through the Law on Protection from Domestic Violence¹⁰⁸. Further strengthening of the protection of women was achieved by amending the Criminal Code in 2024¹⁰⁹, which introduced femicide as a separate criminal offence, recognised gender-based violence as an aggravating circumstance, and tightened penalties for rape and paedophilia. At the same time, amendments to the Code of Criminal Procedure¹¹⁰ have improved the position of victims by allowing for pre-trial detention in the event of a breach of precautionary measures, recognising the right to appeal against decisions on these measures, and further strengthening victims' procedural rights after the conclusion of the proceedings.

106 Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), [Baseline Evaluation Report on Legislative and Other Measures Giving Effect to the Provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence \(Istanbul Convention\): Croatia](#), Strasbourg: Council of Europe, 2023.

107 [Criminal Code](#), Official Gazette Nos. 125/11, 144/12, 56/15, 61/15, 101/17, 118/18, 126/19, 84/21, 114/22, 114/23, 36/24, and 152/24.

108 [Protection against Domestic Violence Act](#), Official Gazette Nos. 70/17, 126/19, 84/21, 114/22, and 36/24.

109 [Act on Amendments to the Criminal Code](#), Official Gazette No. 36/24.

110 [Act on Amendments to the Criminal Procedure Act](#), Official Gazette No. 36/24.

There are several institutions and mechanisms in Croatia aimed at protecting women. Among them are the Ombudswoman for Gender Equality, as an independent body responsible for combating discrimination in the field of gender equality, and the Ombudswoman, who acts as the plenipotentiary of the Croatian Parliament for the protection of human rights and freedoms, but also as the National Preventive Mechanism for the Protection of Persons Deprived of Liberty. In addition to the institutional framework, there are approximately 60 organisations and their branches in Croatia that provide security, legal and psychosocial support to victims of gender-based violence, while victims can obtain additional assistance through the Support and Cooperation Network¹¹¹, which consists of 11 associations. There is also a national call centre¹¹² for victims of crime and misdemeanours, as well as free legal¹¹³ and psychological counselling centres. Most of these programmes and services have been developed through initiatives by civil society organisations, with the financial support of the European Union and the competent state authorities.

The experiences of women journalists are different. Some journalists recognise that certain attacks and threats are directed at them precisely because of their gender. They state that attackers are more likely to opt for physical aggression because they perceive women as physically weaker and estimate that such an approach will achieve a stronger effect of intimidation. Some journalists who do not have children also point out that they are not sure whether, with the awareness of all the risks of the profession, they would do their job just as bravely if they knew that the consequences could be reflected in their family. At the same time, women journalists often do not report all attacks and threats because they perceive them as part of the professional environment. Some of them emphasise that they sometimes do not even consider reporting, for fear that they could be perceived within the newsrooms as people who are easily intimidated. The result of a survey conducted by the Trade Union of Croatian Journalists¹¹⁴ on harassment of women journalists in the workplace showed that most cases remain unreported, especially sexual assaults (84.52%), due to distrust in institutions (46.48%), fear for the workplace (45.07%) and normalisation of violence (38.03%).

— C.4 THE PRACTICE OF REGULAR PUBLIC CONDEMNATION OF THREATS AND ATTACKS ON JOURNALISTS AND MEDIA HAS BEEN ESTABLISHED

State authorities and key political actors still do not have a consistent practice of publicly and

111 Network of Support and Cooperation for Victims and Witnesses of Crime and Misdemeanours, "[Network Members](#)", accessed March 12, 2026.

112 Ministry of Labour, Pension System, Family and Social Policy of the Republic of Croatia, "[On the Occasion of the International Day for the Elimination of Violence against Women, the 24-Hour Free and Anonymous Helpline 116 006 Was Launched](#)", November 25, 2020.

113 Ministry of Justice, Public Administration and Digital Transformation of the Republic of Croatia, "[Authorised Associations and Legal Clinics Providing Primary Legal Aid](#)", accessed March 12, 2026.

114 A study by the Croatian Journalists' Union conducted within the framework of the project 'Ending Workplace Harassment from the Media Industry', carried out in Croatia by Emil Čančar and Dr. Dina Vozab; the survey was conducted on a sample of 216 media workers and journalists in the second half of 2025; 7 interviews were conducted with journalists, as well as 3 interviews with experts. The data for the purposes of this analysis were taken from a draft report and a PowerPoint presentation, as the final national research report was not publicly available at the time of writing.

unequivocally condemning threats and attacks against journalists and other media professionals.

Public officials and political actors rarely clearly and timely condemn attacks on journalists in their public appearances. Such condemnations most often come from the opposition, and only occasionally from government representatives, mostly after certain cases have attracted strong media and public attention, so that they can no longer be ignored. At the same time, it is certain high-ranking officials who are often the source of verbal attacks on journalists, which instead of deterring violence creates an enabling environment for further pressure and threats.

In Croatia, there is still a social climate in which journalists are often perceived as the culprits for various problems, and such a relationship is occasionally further encouraged by certain public officials.

— C.5 POLICE AUTHORITIES ARE SENSITIVE TO JOURNALISTS' PROTECTION ISSUE

Police officers at all levels of education are included in training programmes that cover the rights of journalists and other media professionals, with a particular focus on protecting their safety and physical integrity in situations of increased occupational risk. Education on freedom of expression and safety of journalists is carried out within the framework of teaching content related to crimes against life and body (Chapter X of the Criminal Code), crimes against personal liberty (Chapter XIII of the Criminal Code) and crimes against public order (Chapter XXX of the Criminal Code), and such programmes are carried out continuously and on an annual basis.

In September 2023, the Ministry of the Interior signed the Agreement on Cooperation with the Croatian Journalists' Association and the Trade Union of Croatian Journalists, with two accompanying protocols: the Protocol on the Conduct of the Police in Cases of Knowledge of Criminal Offences Committed to the Detriment of Journalists and Other Media professionals in the Course of Performing Their Work Tasks (Protocol 1) and the Protocol on the Conduct of the Police, Journalists and Other Media professionals at Public Gatherings of Public Interest (Protocol 2). The aim of the Agreement is to improve prevention and ensure a faster and more effective response in situations where the safety of journalists is threatened. After the entry into force of these documents, the Chief Police Director sent an official instruction according to which police officers in all 20 police departments in Croatia are obliged to apply these protocols when there are prescribed conditions for this. During 2025, Protocol 1 was activated 19 times, while Protocol 2 was applied in one case.

As a rule, during 2025, the police showed a sufficient level of attention to the issue of journalists' safety, but individual cases were also recorded that indicate unfounded conduct. One such incident occurred on February 13, 2025 at the Rojc Community Centre in Pula, when Mirjana Radulović and

Branimir Slijepčević¹¹⁵, responsible persons of Radio Rojc, were detained. According to available information, Radulović called the police because of repeated problems with minors from a nearby home for the upbringing of children and youth, who allegedly disrupted the work of the centre. After the arrival of the police, there was a verbal conflict, and police officers decided to detain Radulović and tried to handcuff her, despite her warning about health problems. Slijepčević tried to react and warn the police about the situation, but despite this, both were detained, which raised serious doubts about the proportionality and justification of the police action.

Over the past few years, quality and continuous cooperation has been developed between the police, the Croatian Journalists' Association and the Union of Croatian Journalists. This cooperation is manifested through regular communication, exchange of information and coordination in cases of threats and attacks on journalists, with the aim of timely action by the competent authorities and strengthening the safety of journalists in the performance of their professional work. However, it can be noted that some police officers, especially in smaller communities, are still not sufficiently educated about the specifics of journalistic work and the scope of protection of the rights freedom of expression and media coverage of issues of public interest.

— C.6 SPECIALISED INVESTIGATIVE UNITS AND/OR OFFICIALS ARE EQUIPPED WITH RELEVANT EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

Within the Police Directorate, there are no special organisational units specialising exclusively in criminal offences committed against journalists and media professionals. Nevertheless, all police officers are obliged, in accordance with the principles of legality, impartiality, urgency and operability, to take appropriate measures and actions to prevent attacks and intimidation of journalists that could jeopardise media freedom in the Republic of Croatia. In this context, criminal investigations are carried out with the aim of establishing all relevant circumstances and identifying the perpetrators, while the police have the necessary resources and technical means at their disposal. As far as the State Attorney's Office of the Republic of Croatia is concerned, according to publicly available information, there are no special organisational units that would deal exclusively with cases of violence against journalists, but such cases are processed within the regular scope of the competent state attorney's offices.

The powers of police officers in detecting and investigating criminal offences and misdemeanours, including those committed to the detriment of journalists and media professionals, are regulated by applicable laws and bylaws. An additional framework for cooperation was established by the Cooperation Agreement between

115 SafeJournalists Network, "[Actual attacks on Journalists, Mirjana Radulović and Branimir Slijepčević, Pula, February 13, 2025](#)", 2025.

the Ministry of the Interior and journalists' associations, which aims to strengthen mutual understanding and improve the protection of journalists, while the associated protocols create preconditions for more efficient criminal proceedings and a safer environment for journalistic work.

During 2024, at the meeting of the Working Group for Monitoring the Implementation of the Protocol held within the National Coordination Committee for the Implementation of the Action Plan for the Development of Culture and Media at the Ministry of Culture and Media, it was determined that the current application of the Protocol requires additional education and information of police and media professionals. In response to these findings, the Police Directorate, in cooperation with the Ministry of Culture and Media, launched educational activities at the end of 2024. In 2025, a total of six one-day workshops were conducted in the editorial offices of the largest media houses in Croatia, which directly involved more than 180 journalists, editors and other media professionals, while one special training for police managers was held, with about 30 participants from all police departments. As far as the State Attorney's Office of the Republic of Croatia is concerned, according to the available information, there are no specific guidelines or internal documents that would regulate in detail the procedure in cases of violence against journalists, nor mechanisms that would ensure uniform and consistent practice in their prosecution and protection. The police, as the body responsible for conducting investigations and criminal investigations, including criminal offences committed to the detriment of journalists and other media professionals in the course of their work, cooperates with the State Attorney's Office of the Republic of Croatia, which is competent for criminal prosecution, in accordance with the applicable Criminal Procedure Act. The State Attorney's Office and the MPUDT also point out that cooperation exists, but the slowness of procedures after police proceedings points to possible structural problems in the system.

— **C.7 INVESTIGATIONS OF SERIOUS PHYSICAL
ATTACKS ON JOURNALISTS AND OTHER MEDIA
ACTORS ARE CARRIED OUT EFFICIENTLY
(INDEPENDENTLY, THOROUGHLY AND PROMPTLY)**

Investigations carried out by the competent authorities are formally aimed at establishing all relevant facts and circumstances related to the crime. According to the available information, police officers use various techniques, tactical procedures and methodological approaches during the criminal investigation to answer fundamental questions about the event, including the identity of the perpetrator, the method of execution, the motive, the means used, and possible participants or instigators. Such an approach indicates the intention for investigations to be comprehensive and to cover the broader context of the case, including possible motives and the connection between the violence and the performance of journalistic activities, within the realistic possibilities of the investigative bodies.

According to the response of the State Attorney's Office of the Republic of Croatia, in criminal cases to the detriment of journalists and media professionals, the State Attorney's Office acts promptly, efficiently and impartially.

However, on the basis of the information provided, it is not possible to further assess the degree of institutional independence of the investigations from the actors involved in the events, nor to assess in more detail the extent to which political motives or broader circumstances related to the journalistic work of the victim are systematically analysed.

The police point out that criminal offences directed against journalists and media professionals, especially those that endanger their physical safety and integrity, are treated with special seriousness and processed with a high degree of professionalism. It stresses that such attacks are directly linked to the performance of journalistic work and pose a threat to freedom of expression and access to information, indicating the intention to treat these cases as a matter of priority and without delay.

In cases of serious attacks on journalists, the action of the competent authorities can be swift and effective. At the very end of 2024, a case of a serious physical attack on a journalist was recorded, in which the police identified, arrested and prosecuted the perpetrator in a short period of time, which indicates that procedural deadlines do not necessarily slow down the investigation when the case is treated as a priority. However, in other cases, criminal charges are filed with the public prosecutor's office, which assesses their merits, and this process can take months or even years. During this period, victims often do not have insight into the progress of the proceedings, which can give the impression of a delay or lack of transparency.

Attacks on journalists are generally classified as criminal offences, with journalism recognised as an activity of public interest in the Criminal Code. Threats against journalists in connection with their work are regulated by Article 139, paragraph 3 of the Constitution of the Republic of Croatia. Article 315b of the Criminal Code, which allows for ex officio prosecution, while additional protection is provided by Article 315b of the Criminal Code, which refers to coercion against persons performing tasks in the public interest or in public service. However, legal qualification alone does not necessarily ensure equal treatment in all cases, so there are examples where such standards have not been applied consistently.

— C.8 JOURNALISTS AND OTHER MEDIA ACTORS ARE EFFICIENTLY PROTECTED FROM VARIOUS FORMS OF ONLINE HARASSMENT

In February 2024, the Cybersecurity Act entered into force in Croatia, establishing a framework for the protection of critical infrastructure, information systems and digital networks from cyber threats and strengthening resilience to security incidents. Security in the digital environment is further regulated by the

Electronic Communications Act, which regulates the security of communication networks and the obligations of internet service providers, as well as the Act on the Implementation of the General Data Protection Regulation, which ensures the application of the GDPR in the national legal framework.

At the level of the European Union, an important regulatory framework is the Digital Services Act (DSA), adopted in 2022, and fully implemented in the Member States, including Croatia, as of 17 February 2024, the DSA does not introduce new criminal offences, but prescribes procedural obligations for online platforms and providers of intermediary services in relation to the treatment of illegal content and user protection. This includes notice-and-action mechanisms for illegal content, the obligation to explain the reasons for moderation decisions, internal complaint systems, the possibility of out-of-court dispute resolution, and the obligation to notify competent authorities when there is suspicion of crimes that pose a threat to security.

The Law on the Implementation of the DSA in Croatia determines the competent authorities for issuing warrants in relation to illegal content, including the State Attorney's Office and the Ministry of the Interior for criminal offences, the Personal Data Protection Agency, the Agency for Electronic Media and other bodies in accordance with sectoral regulations. HAKOM, in its role as a national coordinator, does not have the authority to assess the legality of content or issue orders, but it receives complaints in case of violations of the obligations of platforms from the DSA. In doing so, the DSA explicitly excludes a general obligation to monitor content and requires that all measures comply with fundamental rights, including freedom of expression and media pluralism.

When it comes to online harassment, it is not explicitly defined as a separate crime, but is reported to the police and dealt with within the framework of existing legal institutes that regulate various forms of harassment. In the Criminal Code, the concept of harassment appears in Article 156, which refers to the criminal offence of sexual harassment under Chapter XVI – Offences against sexual freedom. Sexual harassment is defined as any verbal, non-verbal or physical unwanted behaviour of a sexual nature that violates the dignity of a person and causes fear or creates a hostile, humiliating or offensive environment.

In addition to the criminal law framework, certain forms of harassment can also be sanctioned through misdemeanor law mechanisms prescribed by the Protection from Domestic Violence Act.

In addition to the criminal law framework, certain forms of harassment can also be sanctioned through misdemeanour law mechanisms prescribed by the Protection from Domestic Violence Act.

As a rule, institutions act on every reported threat, but a significant problem is that journalists often do not report such

incidents at all. Some of them ignore threats or perceive them as a common and integral part of the professional environment.

— **C.9 INVESTIGATIONS OF ALL TYPES OF ATTACKS AND VIOLENCE AGAINST JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT TRANSPARENTLY**

Victims often face limited access to information during investigative procedures. As a rule, the procedure begins with the submission of a criminal complaint to the public prosecutor's office, which then verifies the merits of the report, and this process can take months or even years. During this period, victims usually do not have insight into the progress of the procedure. The right of access to information about the case is exercised only after the decision of the public prosecutor to bring charges, although such information is important for the effective protection of the victim's rights. Also, access to the file is not automatically ensured, but requires the active participation of the victim and their legal representative, who can only then have access to the documentation of the criminal proceedings.

Certain information on court proceedings against journalists is available through the websites of the courts and the Public Prosecutor's Office, while further information can be requested through official requests. However, the frequency and scope of information provision vary between courts, and according to the experiences of journalists from interviews and focus groups, there is no uniform practice in treatment. According to the available information, there were no complaints related to the accuracy of the published data.

— **C.10 QUALITY STATISTICS COLLECTION SYSTEMS ESTABLISHED BY STATE AUTHORITIES TO STEM IMPUNITY**

The Ministry of the Interior, the State Attorney's Office of the Republic of Croatia and the Ministry of Justice, Public Administration and Digital Transformation keep statistical records of cases involving journalists. The Ministry of Justice, Public Administration and Digital Transformation collects the necessary data from the courts on the basis of inquiries.

The data from these records are not publicly available. To the inquiries sent by the CJA during this and previous years, statistical information is provided exclusively by the Ministry of the Interior and the Ministry of Justice, Public Administration and Digital Transformation. The Ministry of the Interior regularly provides data on recorded events related to journalists, including the number of threats and attacks and the stage of proceedings in individual cases, while the Ministry of the Interior provides information on civil and criminal proceedings against journalists before Croatian courts.

All data provided by the Ministry of Justice, Public Administration and Digital Transformation is fully anonymised and does not include classification by gender or other

socio-demographic characteristics. This year, the Ministry of the Interior submitted somewhat more detailed statistical data, which, among other things, contain a division by gender.

— C.11 NON-PHYSICAL THREATS AND HARASSMENT

The number of non-physical threats is continuously increasing: 8 threats were recorded in 2023, 10 in 2024 and 13 in 2025. A large number of cases from 2023, 2024 and 2025 that were reported are still unresolved. The most paradigmatic cases of other forms of pressure that threaten the safety of journalists refer to Matej Devčić and Tomislav Kukec, Croatian journalists who reported from Serbia, and were exposed to public targeting, discrediting and security threats.

In the case of Matej Devčić, a journalist for the *Telegram.hr* portal, during the student protests in Serbia, his personal data, including a photo of his identity card and information about accommodation, were publicly published in a television program, with accusations that he was involved in organizing the protests. This form of pressure, carried out through the media and third parties, poses a serious threat to the safety of journalists and has a clear deterrent effect. In the case of Tomislav Kukec, the Serbian media publicly accused and labeled him as a person who incites protests and attacks on the state leadership, which exposed him to discrediting and potential danger, even though he was in Serbia exclusively for professional journalistic reporting.

Category	Number	Brief description of cases
Non-physical threats and harassment: – Surveillance or monitoring – harassment by phone calls – arbitrary harassment by representatives of judicial or administrative authorities – Aggressive statements by public officials – other forms of pressure that can jeopardize the safety of journalists in the performance of their work. These types of threats do not include mobbing and bullying in the work environment.	13	– 30.11.2025. FPZG professor Boris Havel publicly sent a sexist and offensive message to journalist Maja Sever on platform X, which quickly spread on social networks and prompted an online lynching. – 22.10.2025. Offensive graffiti was written on the building of the Zadar County House mentioning journalist Ivica Neveščanin, which represents public intimidation and stigmatization. – 30.09.2025. Journalist Silvia Novosel was verbally attacked and intimidated at the session of the City Council of Križevci, after which she was further publicly discredited through political and media publications. – 2.8.2025. An indictment has been filed against journalist Danka Derifaj Mikulaš and the cameraman for journalistic work in the public interest, which is a form of legal pressure and intimidation. – March 2025 The city authorities in Križevci have continuously exerted institutional pressure on the Križevci.info portal and journalist Silvija Novosel through frequent denials and public reactions. – 14.3.2025. Several Croatian journalist teams were prevented from entering Serbia and returned from the border with the explanation of the security risk. – February 2025 Journalist Vedran Morin has been the target of online threats and physical intimidation related to his investigative work, including an attack on a person believed to have been mistaken for him. – 24.2.2025. HNK Hajduk Split (football club) permanently revoked the accreditation of journalist Pero Smolčić without explanation, restricting his right to report. – 12.2.2025. Croatian journalist Tomislav Kukec has been publicly targeted and accused in the Serbian media for reporting on student protests. – 4.2.2025. After she reported the first incident, a new offensive message was written in front of Andriana Baćurin's house, indicating repeated intimidation directed at her because of her journalistic work. – 1.2.2025. <i>Trend</i> media journalist Andriana Baćurin found an offensive sign in front of her house that is associated with her journalistic report on the St. Sava Academy. – 24.1.2025. The mayor of Split, Ivica Puljak, verbally attacked journalist Damir Šarec at a public forum, which encouraged stigmatization and obstruction of journalistic work. – 16.1.2025. Telegram.hr's journalist Matej Devčić was publicly targeted in Serbia with the publication of personal data and whereabouts, which seriously endangered his safety.

— C.12 THREATS AGAINST THE LIVES AND PHYSICAL SAFETY OF JOURNALISTS

During 2025, 6 threats against life and serious bodily injuries were recorded.

Compared to the 2 recorded cases in 2024, in 2025 this number has increased significantly to as many as 6 reported threats against life and serious bodily injuries.

The most paradigmatic case of threats against life of a journalist that occurred live and face-to-face is the case of Gabrijela Radanović from September 11, 2025. While reporting on illegal taxi drivers in the port of Split, Radanovic was subjected to direct, verbal threats and severe insults from the person she was reporting on. The threats were made directly, in a public space, and contained implicit references to the murder of journalist Ivo Pukanić, suggesting the possibility of serious violence. The threats were related to her journalistic work,

made face to face, and represent a particularly serious example of endangering the safety of journalists in the field.

The most paradigmatic cases of threats of physical violence relate to Jurica Pavičić and Miljenko Jergović. In both cases, the threats were publicly written on the buildings in which they live, which made them visible not only to them but also to their neighbors, and had a strong element of public marking and stigmatization. In the case of Jurica Pavičić (19.10.2025), graffiti with a vulgar and threatening message was written at the entrance to the building where he lives, exposing the journalist to an implicit threat of physical violence through direct but impersonal communication, without direct contact with the perpetrator. In the case of Miljenko Jergović (28.8.2025), graffiti with a direct threat, formulated as an announcement of violence, was written on the outer wall of the building where he lives, which represents an explicit threat of physical harm or murder. The threat was indirect, but clearly directed, and had the function of public intimidation, creating a sense of insecurity not only in the journalist himself, but also in his immediate environment. In both cases, the threats were physically present in public spaces, deliberately placed to expose journalists to public shaming and stigmatization, sending the message that they were marked as targets, which at the same time intimidates their neighbors and the wider community.

Category	Number	Brief description of the cases
Death threats and physical harm threats , which may include: – death threats against a journalist, his family and friends or a journalistic source; – threats to cause serious bodily harm to a journalist, his family and friends or a journalistic source. These threats can be: – direct or through third parties; – by means of electronic or face-to-face communication; – implicit and explicit.	6	– 20.11.2025. Istarski.hr journalist Nenad Čakić received implicit threats of physical violence via Facebook and WhatsApp after comments about a fans' banner. – 24.11.2025. A-HSP President Dražen Keleminec publicly published a photo of journalist Robert Mihaljević with insults, which was followed by death threats and calls for expulsion in the comments. – 19.10.2025. Graffiti with a vulgar message and threatening content was written on the building where journalist Jurica Pavičić lives. – 11.9.2025. Journalist Gabrijela Radanović was subjected to severe insults and threats, including indirect references to murder, while reporting on illegal taxi drivers in Split. – 28.8.2025. Journalist and writer Miljenko Jergović found graffiti with a direct death threat on the building where he lives, which he assessed as a serious attempt at intimidation. – August 2025. Journalist Vedran Morin was faced with continuous threats of physical violence and murder through social networks due to his investigative work on irregularities in the work of dog shelters.

— C.13 ACTUAL ATTACKS

In 2025, 5 physical attacks on journalists were registered.

The number of attacks on journalists increased in 2025, where 5 attacks were recorded compared to 2024, in which 4 attacks were recorded.

On February 13, 2025, an incident occurred at the Rojc Community Centre in Pula, which resulted in the arrest of Mirjana Radulović and Branimir Slijepčević, the leaders of *Radio Rojc*. Radulović called the police because of frequent problems with minors from the nearby Home for the Upbringing of Children and Youth, who allegedly made noise, took things from the premises and banged on the door.

After the arrival of the police, there was a verbal discussion between Radulović and the police officers. The police decided to detain Radulović, trying to handcuff her, which caused her resistance, noting that she was in pain. Her colleague, Slijepčević, tried to intervene, alerting the police about her health condition. Despite this, both were detained.

Category	Number	Brief description of the cases
Real attacks on journalists Attacks can include actual physical or mental injury, kidnapping, home or newsroom intrusion, confiscation of equipment, illegal detention of journalists, assassination attempts, etc.	5	– 12.11.2025. During filming at Ban Jelačić Square in Zagreb, an unknown man verbally and physically attacked the N1 television crew, injuring the cameraman and detaining the perpetrator. – 22.8.2025. At the opening of the "Nosi se" festival in Benkovac, journalist Melita Vrsaljko was surrounded, verbally and physically attacked with Ustasha chants, while the police did not intervene effectively and was advised to leave the city. – 10.5.2025. During the filming of the TV show <i>Provjereno</i> at Štrbački buk, the cameraman and journalist Danka Derifaj were attacked, and on that occasion she was slapped. – 13.2.2025. Police in Pula detained the leaders of <i>Radio Rojc</i>, Mirjana Radulović and Branimir Slijepčević, after a verbal conflict, despite warnings about their health condition. – 26.1.2025. Ivan Žada was detained and held overnight at a police station for allegedly failing to respond to a court hearing in a defamation proceeding, which is linked to pressure due to his journalistic activities.

— **C.14 THREATS AND ATTACKS ON MEDIA OUTLETS
AND JOURNALISTS' ASSOCIATIONS**

In 2025, one attack on the media and 5 threats to media houses or newsrooms were registered.

Compared to 2024, in which 2 attacks and 7 threats to media outlets and organisations were reported, in 2025 there was a minimal decrease in the number of such incidents.

The most paradigmatic cases of threats and attacks on media houses and organisations in the observed period were related to the weekly Novosti. As a minority media, Novosti was exposed to multiple forms of pressure – from direct death threats and intimidation of the editorial staff, to political and financial pressures coming from prominent representatives of the government and the ruling majority. Public calls for the abolition or reduction of their funding, with simultaneous threats and attacks, indicate the systematic targeting of this media because of its minority status and critical journalism. Such patterns represent a serious blow to media freedom and pluralism and are particularly worrying in the context of the future sustainability and safety of minority media in Croatia.

Category	Number	Brief description of the cases
Threats and attacks on media institutions, organizations, journalists' and media associations. Real attacks on the property of media and organizations, their staff, the seizure of equipment, aggressive statements by officials, etc. The description of threats and attacks may include some of the above categories.	6	Attacks on media outlets and organisations – 5.2.2025. The weekly <i>Novosti</i> received a threatening letter with powder of unknown composition and a reference to “Novichok”, with political-ideological insults, which is a serious act of intimidation of the editorial staff. Threats to media outlets and organisations – 31.12.2025. Chief State Prosecutor Ivan Turudić withheld a statement from N1 television while addressing other media, disabling the recording, which indicates discriminatory pressure on a particular media. – 5.12.2025. An e-mail was sent to the editorial office of <i>Novosti</i> with a direct death threat to the entire editorial office; the police reacted quickly and arrested the suspect. – November 2025 Representatives of the Homeland Movement announced the complete abolition of funding for <i>Novosti</i> in 2026, with a prior reduction in funds, which puts political pressure on the minority media. – 24.4.2025. The Council for National Minorities of the Republic of Croatia has reduced the financing of <i>Novosti</i> for 2025, despite the increase in the total budget, in the context of earlier political announcements. – 6.2.2025. Serious threats of violence and threats of bombs were sent to the editorial office of <i>Radio Nacional</i> via YouTube comments at the show <i>Becti iz regiona</i>



Conclusions and recommendations

CONCLUSIONS

Although freedom of expression in Croatia is still formally guaranteed by the Constitution and the elaborate legislative framework that includes the media, access to information and the protection of journalists, practice shows that these rights have not been fully effectively exercised. The lack of comprehensive and timely reforms, especially of the Media Act, and the lack of transparency in legislative processes further deepen the gap between the normative framework and the actual situation. Political influence persists, in particular through the appointment procedures of the regulatory bodies and management structures of the public broadcaster, which calls into question their effective independence. Access to information remains uneven and often depends on the discretion of the institutions, while non-transparent state advertising and the lack of clear criteria for media financing have a negative impact on editorial autonomy. While there are some advances in transparency, such as the establishment of a database on media ownership and financing, key issues such as political influence, unclear funding and the lack of systematic evaluation of public aid remain unresolved. At the same time, the legal framework for protection against SLAPP lawsuits has not yet been developed, and lengthy court proceedings and high claims for damages continue to have a chilling effect on free and investigative journalism. The technological transformation of the media landscape, including the development of digital platforms and artificial intelligence, which are not adequately covered by existing legislation, also poses additional challenges.

The working conditions of journalists in Croatia are marked by growing insecurity and structural weaknesses that threaten the sustainability of the profession in the long term. Although some journalists have formal employment contracts, there is an increasing number of those who work in precarious conditions, without adequate legal and social protection. Low wages, limited opportunities for advancement and unstable employment relationships further demotivate young people to

enter the profession and encourage experienced journalists to leave it. Media closures, restructuring and redundancies in 2025 have further reduced the number of jobs and weakened media pluralism. The status of journalists is further endangered by the introduction of artificial intelligence into work processes without clear rules of use and a message from publishers that it is a good mechanism for reducing the need for journalists' work. Editorial independence is often compromised through the influence of owners, advertisers and political actors, while formal protection mechanisms, such as media statutes, remain poorly enforceable in practice due to a lack of oversight and sanctions. Although journalists largely state that they have freedom to choose their topics, pressures continue to emerge through subtle forms of control, resulting in self-censorship and restriction of critical reporting. Non-profit media face additional challenges of financial instability and dependence on project funding, while women journalists suffer additional forms of discrimination, including gender stereotypes, sexual harassment and precarious working conditions, with a marked lack of institutional protection.

The safety of journalists in Croatia remains a serious challenge despite the existence of formal protection mechanisms and improved cooperation between the police and journalists' organisations. Although there have been some advances in the education and application of protocols, the number of threats, especially online, as well as death threats and physical attacks, shows a worrying growth trend. The reactions of the competent institutions are often uneven, and special problems arise in the further actions of the State Attorney's Office, where reports are rejected or lengthy procedures that create a sense of impunity. The lack of specialised bodies for the protection of journalists, the limited transparency of procedures and the unavailability of complete statistics further undermine trust in institutional protection. Online harassment and threats remain largely unreported, while public discourse, including statements by individual political actors, often contributes to an atmosphere of intolerance towards journalists. Particularly worrying are cases of physical attacks and death threats, as well as the systematic targeting of individual journalists and media, including minority newsrooms, which points to a broader problem of social perception and safety of journalistic work.

Media freedom and the safety of journalists in Croatia remain in a state that requires systematic and in-depth reforms. While the legislative framework formally provides for fundamental rights and protection mechanisms, their implementation in practice remains inconsistent, fragmented and often insufficiently effective. Political and economic pressures, non-transparent funding, precarious working conditions, and a growing number of threats and attacks continue to limit free and independent journalism. At the same time, technological changes further complicate the regulatory framework, which does not keep up with the transformation of the media space fast enough. Overall, the Croatian media system is characterised by structural weaknesses, a lack of institutional protection and a limited capacity to ensure professional standards, which points to the need for a comprehensive improvement of the legislative, institutional and operational framework to ensure effective media freedom and the safety of journalists.

RECOMMENDATIONS

A.

- Decriminalise the offences of insult and defamation.
- Ensure consistent application of the Right of Access to Information Act through the introduction of sanctions for bodies that do not respond to inquiries or unjustifiably reject them.
- Accelerate the adoption of the new Media Act through a transparent and inclusive process, involving journalists' organisations and civil society.
- Reform the procedures for the appointment of members of the Council for Electronic Media and the governing bodies of HRT by introducing qualified majority and expert criteria, in order to reduce political influence.
- Establish an obligation to make public all data on state advertising (including public companies and agencies), with clearly defined allocation criteria.
- Introduce mechanisms for early dismissal of SLAPP lawsuits in legislation, in accordance with the EU directive, in order to reduce their chilling effect and lengthy proceedings.
- Ensure stable and multi-year funding models for non-profit and minority media to reduce political dependency and financial insecurity.
- Expand and upgrade the existing database on media ownership and financing to all media sectors, including print media and advertisers.
- Align the legislative framework with the development of digital media and artificial intelligence, including redefining the concept of journalist in the context of the modernisation of journalism.

B.

- Introduce minimum standards of working conditions and wages in the media sector, as well as special protection measures for freelancers and freelancers, given the growth of precarious forms of work.
- Encourage the conclusion of collective agreements at the level of sectors or individual media outlets to ensure greater job security and protection of journalists' rights.
- Introduce supervisory mechanisms and sanctions for non-compliance with editorial statutes, in order to ensure their effective application in practice.

- Introduce an obligation of transparency in the relationship between editorial staff and advertisers, including flagging sponsored content and limiting advertisers' influence over editorial decisions.
- Define models of ethical application of artificial intelligence in newsrooms, with clear rules for the use and labelling of AI-generated content and the protection of journalists' jobs.
- Develop programmes to encourage sectoral and specialised journalism to respond to the decline in quality and analytical reporting.
- Introduce the obligation to adopt and implement internal protocols for protection against gender discrimination and sexual harassment in all media.
- Provide safe and anonymous channels for reporting censorship, pressure, and violations of professional standards within newsrooms.
- Conduct regular research on the impact of owners and advertisers on editorial policy to enable informed policymaking.

C.

- Ensure consistent application of existing protocols on the protection of journalists through mandatory and continuous education of police officers and media professionals.
- Establish specialised contact points or officers within the police and prosecution service for cases of attacks on journalists.
- Introduce an obligation for the State Attorney's Office to explain decisions rejecting reports in cases of threats against journalists, in order to increase transparency and trust.
- Introduce a legal definition of online harassment of journalists and ensure more effective mechanisms for prosecuting it.
- Introduce the obligation of public and timely condemnation of attacks on journalists by state and political officials.
- Ensure the availability of psychological and legal assistance to journalists who are exposed to threats and violence.
- Introduce programs to educate journalists on physical and digital security, including source protection and secure communication.
- Increase the transparency of criminal and judicial proceedings in cases of attacks on journalists, including informing victims in a timely manner about the progress of the proceedings.

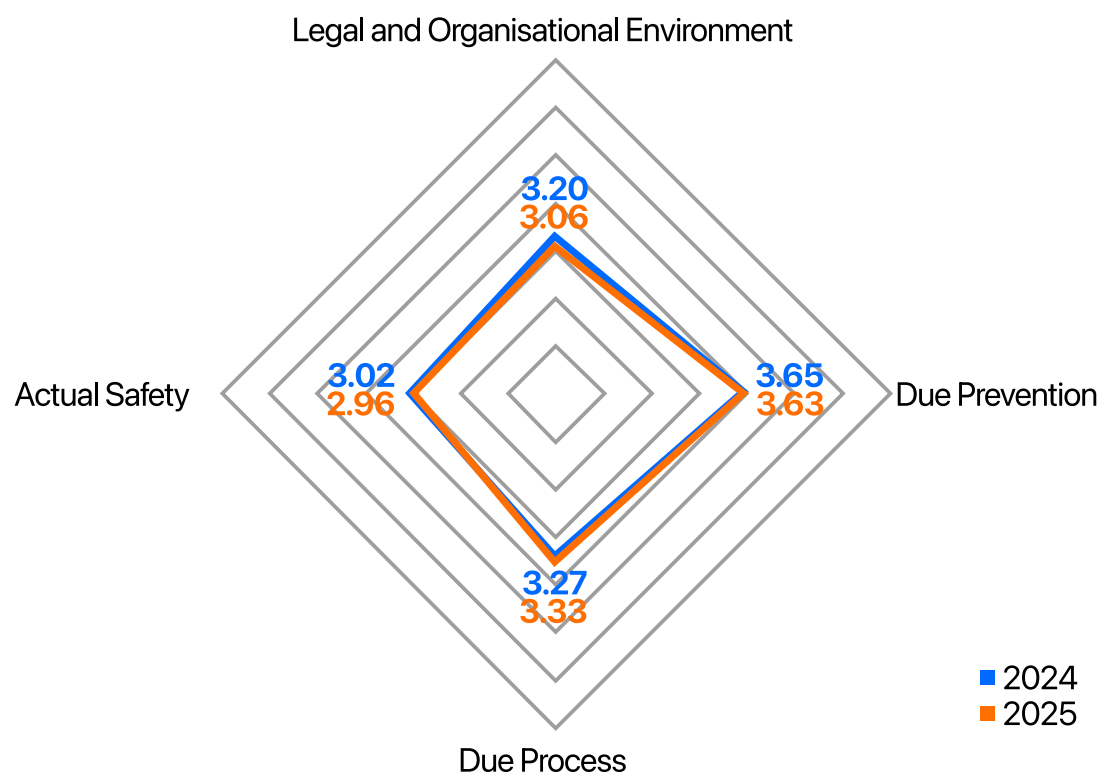
IV

Journalists' Safety Index – Croatia – 2025

This part of the report presents the Journalists' Safety Index in 2025 compared to the previous year, 2024. For each of the four dimensions and all 19 indicators, it provides a brief explanation of the key changes that occurred in 2025.

A broader explanation of the data and changes that occurred for each individual indicator of the Index can be read in the narrative part of the report:

Indicator in the Journalists' Safety Index	Narrative report
I. Legal and organizational environment	
Legal provisions related to defamation and their application do not have and intimidating effect on journalists and the media	A.6
The confidentiality of journalistic sources is guaranteed by law and respected by the authorities	A.8
Other laws are applied objectively and allow journalists and other media professionals to work freely and safely	A.7
Journalists are free to practice their profession and to establish, join and participate in the work of journalists' associations	A.9
Journalists' work positions are stable and they are protected at the workplace	B.1
II. Prevention	
Journalists and other media professionals have access to immediate and effective safeguards when threatened	C.1
Journalists and other media professionals (whose lives or physical integrity are at real and immediate risk) have access to specific protection/safety mechanisms	C.2
Female journalists have access to legal measures and support mechanisms when faced with gender-based threats, harassment and violence	C.3
The practice of regular public condemnation of threats and attacks against journalists and the media has been established	C.4
Police authorities are sensitive to journalists' safety issues	C.5
III. Process	
Specialised investigative units and/or officers are equipped with the relevant knowledge to investigate attacks and violence against journalists	C.6
Investigations into serious physical attacks on journalists and other media professionals are carried out effectively	C.7
Journalists and other media professionals are effectively protected from various forms of online harassment	C.8
Investigations of all types of attacks and violence against journalists and other media professionals are conducted transparently	C.9
Government authorities have established a sound system for the collection of statistical data to prevent impunity	C.10
IV. Actual Safety	
Non-physical threats and harassment	C.11
Death threats and threats to physical safety of journalists	C.12
Real attacks	C.13
Threats and attacks on media institutions, organizations, media and journalists' associations	C.14



	2024	2025		Major new changes in each dimension
I. Legal and organizational environment	3.20	3.06	↓	In 2025, the situation in the legal and organisational environment for journalists in Croatia deteriorated slightly. While some key legal frameworks have remained formally unchanged – such as the provisions on defamation and the protection of journalistic sources – significant risks remain in practice, including the deterrent effect of lawsuits, the lack of safeguards under the European Media Freedom Act, and the potentially negative impact of Article 307a of the Criminal Code on sources. A key deterioration is evident in the application of the law and working conditions: the lack of an effective framework to counter SLAPP lawsuits, lengthy court proceedings and concrete cases of criminal prosecution of journalists point to growing legal pressure and uncertainty in work. In addition, examples of selective treatment of the media, informal pressures on trade union organizing and a significant deterioration of working conditions through an increase in precarious forms of work, layoffs and restructurings (including shutdowns and reductions of newsrooms) have been recorded, which together contribute to the destabilization of the journalistic profession and the weakening of its independence.
II. Prevention	3.65	3.63	↓	In 2025, the situation in the area of prevention deteriorated slightly. Although certain protection mechanisms have been improved through education and the application of protocols, the overall effectiveness of the system is still limited, especially in the phase of processing threats and ensuring the actual protection of journalists. It is crucial that, despite the actions of the Ministry of the Interior on all reports, the low level of resolution of threats and the refusal of the State Attorney's Office to initiate proceedings in certain cases reduce trust in the system, while special protection mechanisms are still not specifically tailored to journalists. In addition, the position of women journalists has deteriorated due to the high level of non-reporting of gender-based violence and the lack of targeted protection, and the lack of consistent public condemnation of attacks and individual cases of police misconduct indicate uneven practices and an insufficient level of institutional sensitivity.

	2024	2025		Major new changes in each dimension
III. Process	3.27	3.33	↑	In 2025, the situation in the field of procedural protection of journalists improved slightly. Progress is visible in strengthening the capacities of the police through training and improving the application of protocols, but key structural problems remain present. It is crucial that there are still no specialized investigative units or clear guidelines within the State Attorney's Office, while the effectiveness of investigations varies – from individual examples of quick action to lengthy procedures lasting months or years, with limited transparency and uneven application of legal provisions. In addition, although the legislative framework has been partially improved, especially in the area of digital regulation, online harassment is still not adequately standardised, a large number of cases remain unreported, and the system for collecting statistical data remains underdeveloped and non-transparent, which makes it difficult to fully monitor and effectively counter attacks against journalists.
IV. Actual Safety	3.02	2.96	↓	In 2025, the state of journalists' safety in Croatia has deteriorated significantly. The increase in the number of non-physical threats, death threats and physical attacks indicates growing pressure and increasingly pronounced threats to journalistic work, with a large number of unresolved cases that further increase the sense of insecurity. Crucially, threats are increasingly direct, public and aimed at personal discrediting and intimidation – from the publication of personal data and media campaigns against journalists to face-to-face graffiti and death threats, as well as the increase in physical attacks on the ground. At the same time, although there has been a slight decrease in the number of attacks on media institutions, the continued political and financial pressures on individual newsrooms, along with threats and selective treatment of the media, confirm that security risks remain high and that the environment for free and safe journalism is further deteriorating.
Journalist Safety Index	3.19	3.15	↓	In 2025, the state of media freedom in Croatia shows further deterioration with limited progress in certain segments of the protection system. Although legal frameworks have remained largely stable, their application remains uneven, with pronounced legal pressure through lengthy proceedings, the absence of effective mechanisms against SLAPP lawsuits and potential risks to the protection of journalistic sources. Of particular concern is the deterioration of the security environment, marked by an increase in non-physical threats, a sharp increase in death threats and an increase in the number of physical attacks, with increasing public targeting and stigmatization of journalists. Despite some advances in education and institutional cooperation, the effectiveness of the system remains limited due to the slowness of procedures, lack of transparency and poor processing of threats, while the lack of consistent public condemnation of attacks and uneven practices further fuel a sense of insecurity. At the same time, the working conditions of journalists continue to deteriorate through the growth of precarious forms of work, layoffs and media shutdowns, which, together with continued political and economic pressures, contributes to the destabilization of the profession and the narrowing of the space for free and independent journalism.



Legal and organisational environment

Legal provisions related to defamation and their implementation do not produce chilling effects on journalists and media



Confidentiality of journalists' sources is guaranteed in the legislation and respected by the authorities



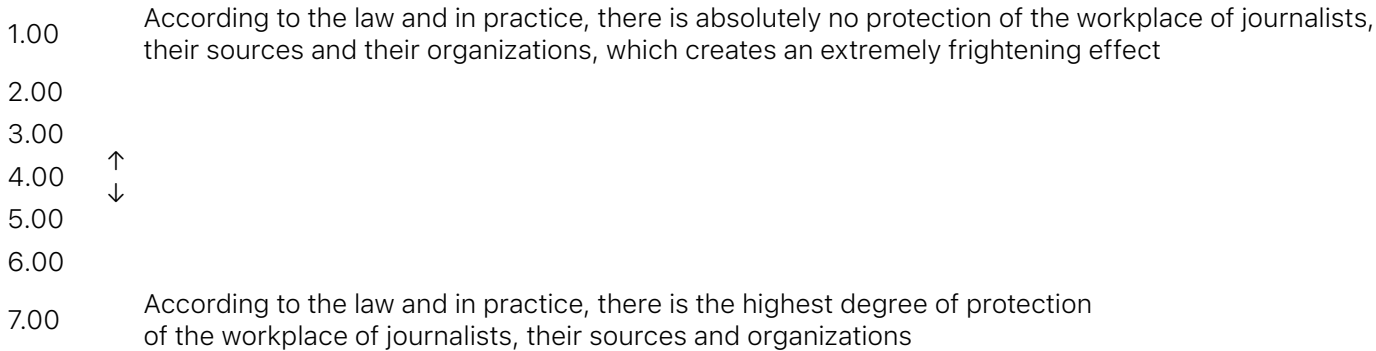
Other laws are implemented objectively and allow the journalists and other media actors to work freely and safely



Journalists are free to pursue their profession and to establish, join and participate in their associations



Journalists' job position is stable and protected at the workplace



INDICATOR 1.1

— LEGAL PROVISIONS RELATED TO DEFAMATION AND THEIR IMPLEMENTATION DO NOT PRODUCE CHILLING EFFECTS ON JOURNALISTS AND MEDIA

Score for 2024: 2.74 / Score for 2025: 2.74

The situation remained largely unchanged. While the legal framework provides for safeguards for journalists, in practice there are still elements pointing to a potential deterrent effect, in particular through high claims for damages and lengthy proceedings. A key issue concerns the proportionality of criminal sanctions and the need for disputes to be resolved more often in a civil framework rather than prosecution. Also, the question of the lack of complete data on the number and nature of lawsuits and the impact of SLAPP procedures and threats of lawsuits on the occurrence of self-censorship among journalists remains open.

INDICATOR 1.2

— CONFIDENTIALITY OF JOURNALISTS' SOURCES IS GUARANTEED IN THE LEGISLATION AND RESPECTED BY THE AUTHORITIES

Score for 2024: 3.14 / Score for 2025: 3.14

The situation remained largely unchanged. Although the protection of the confidentiality of journalistic sources is formally guaranteed by law and is generally respected by the institutions, certain legislative changes and the lack of additional safeguards open up space for potential risks and a deterrent effect on sources. The key issue concerns the compliance of the legislative framework with the European Media Freedom Act, in particular with regard to protection against surveillance and the use of spyware and the introduction of clear procedural safeguards. Also, the possible indirect effect of provisions such as Article 307a of the Criminal Code on the readiness of sources to communicate with journalists, as well as the lack of transparency and protection in cases of surveillance measures, is problematic.

INDICATOR 1.3

— OTHER LAWS ARE IMPLEMENTED OBJECTIVELY AND ALLOW THE JOURNALISTS AND OTHER MEDIA ACTORS TO WORK FREELY AND SAFELY

Score for 2024: 2.84 / Score for 2025: 2.50

The situation has deteriorated compared to 2024. The decline in the rating reflects increased challenges in the application of the law, especially through individual cases of criminal prosecution of journalists and court decisions that do not sufficiently recognize the context of journalistic work and public interest. It is crucial that, despite certain initiatives to combat SLAPP lawsuits and educate the judiciary, there is still no specific legal framework or effective mechanisms for their early dismissal. In addition, the length of court proceedings and examples of uneven case law create financial and

professional pressure on journalists and can have a deterrent effect on the free and safe conduct of journalistic work.

INDICATOR 1.4

— JOURNALISTS ARE FREE TO PURSUE THEIR PROFESSION AND ESTABLISH, JOIN AND PARTICIPATE IN THEIR ASSOCIATIONS

Score for 2024: 4.94 / Score for 2025: 4.77

The condition deteriorated slightly. The drop in the rating is related to specific cases of selective treatment of the media, such as the situation in which the Chief State Prosecutor Ivan Turudić refused to give a statement to N1 television and prevented it from recording, while other media had access at the same time. It is crucial that the proposal to introduce a register of journalists and photojournalists, which could have enabled greater control over the profession, was not further developed during 2024 and 2025 after warnings from the Croatian Journalists' Association. At the same time, although no formal bans on membership in professional organizations have been recorded, some journalists still face informal pressure from employers who see membership in the Union as a form of resistance. When it comes to freedom of reporting, 22.8% of respondents to the survey indicated that they had a problem with disabling reporting.

INDICATOR 1.5

— JOURNALISTS' JOB POSITION IS STABLE AND PROTECTED IN THE WORKPLACE

Score for 2024: 2.37 / Score for 2025: 2.17

The condition deteriorated slightly. The decline in the rating reflects a further deterioration in working conditions, an increase in precarious forms of work and a number of concrete layoffs and restructurings in the media sector during 2025. The share of journalists working as freelancers or freelancers without full labor protection is increasing, while the number of full-time employees is decreasing, and the number of collective agreements is not increasing significantly, which further weakens labor rights and security in the profession. In addition, the closure of Al Jazeera Balkans, the restructuring of N1, the dismissals of the Nacional portal and the shutdown of Radio Nacional, as well as the reduction in the number of employees at HRT, together with low wages and pressures on journalists (including transfers due to ethical decisions and encouragement to early retirement), further deepen insecurity and destabilize the journalistic profession.



Prevention



INDICATOR 2.1

— JOURNALISTS AND MEDIA ACTORS HAVE ACCESS TO IMMEDIATE AND EFFECTIVE PROTECTIVE MEASURES WHEN THEY ARE THREATENED

Score for 2024: 3.43 / Score for 2025: 3.43

The situation remained unchanged compared to 2024. Although journalists formally have access to safeguards and the police act on reports, the effectiveness of the system remains limited, especially in terms of the resolution of threat cases and further prosecution. In 2025, the police registered 23 crimes against journalists, with the overall resolution rate being relatively low (43.5%), and the even lower resolution rate of 33.3% is particularly worrying for threats. In addition, although the Ministry of the Interior acts on all reports, the problem remains in the actions of the State Attorney's Office of the Republic of Croatia, which often refuses to initiate proceedings ex officio, which reduces the real level of protection and trust of journalists in the system.

INDICATOR 2.2

— JOURNALISTS AND OTHER MEDIA ACTORS (WHOSE LIVES OR PHYSICAL INTEGRITY ARE AT A REAL AND IMMEDIATE RISK) HAVE ACCESS TO SPECIAL PROTECTION/SAFETY MECHANISMS

Score for 2024: 3.19 / Score for 2025: 3.37

The condition improved slightly. The increase in the rating reflects visible shifts in the education and application of existing protection mechanisms, especially in relation to the previously observed shortcomings in the implementation of the protocol. During 2025, specific trainings were conducted for more than 180 journalists and 30 police managers, which improved information and the application of protocols. However, even in this reporting year, one case of attack on journalist Vrsaljko was recorded during a festival in Benkovac, at a public event attended by the police. At the same time, although the Agreement between the Croatian Journalists' Association, the Trade Union of Croatian Journalists and the Ministry of the Interior represents an important framework, special protection mechanisms are still not specifically adapted to journalists, but general legal instruments are applied, the actual effectiveness of which has yet to be confirmed through practice.

INDICATOR 2.3

— FEMALE JOURNALISTS HAVE ACCESS TO LEGAL MEASURES AND SUPPORT MECHANISMS WHEN FACED WITH GENDER-BASED THREATS, HARASSMENT, AND VIOLENCE.

Score for 2024: 3.83 / Score for 2025: 3.67

The situation has worsened compared to 2024. Despite the relatively developed legislative and institutional framework for the protection of women from gender-based violence, the decline in the rating reflects the gap between formal

mechanisms and their actual availability and use in practice. Although additional legal protections have been introduced, such as recognizing femicide and strengthening victims' rights, cyber harassment is not specifically standardized, and existing mechanisms are not specifically tailored to women journalists facing professionally conditioned risks. At the same time, the high rate of unreporting violence – including 84.52% of unreported cases of sexual harassment – along with reasons such as distrust in institutions, fear for the workplace and the normalisation of violence, indicates the limited effectiveness of support and protection systems in real working conditions.

INDICATOR 2.4

— THE PRACTICE OF REGULAR PUBLIC CONDEMNATION OF THREATS AND ATTACKS ON JOURNALISTS AND MEDIA HAS BEEN ESTABLISHED

Score for 2024: 3.77 / Score for 2025: 3.77

The situation remained unchanged. There is still no consistent and systematic practice of timely and unequivocal public condemnation of threats and attacks against journalists by state authorities and political actors. Such condemnations most often come from the opposition or only after strong public pressure, while government representatives rarely react proactively and clearly. In addition, some public officials continue to contribute to the negative perception of journalists with their statements, thus creating an environment that can encourage pressures and threats instead of deterring them.

INDICATOR 2.5

— POLICE AUTHORITIES ARE SENSITIVE TO JOURNALISTS' PROTECTION ISSUE

Score for 2024: 4.03 / Score for 2025: 3.91

The condition deteriorated slightly. Although the police also conduct training and apply protocols for the protection of journalists, the drop in the rating reflects individual cases of inappropriate treatment and an uneven level of sensitivity in practice. During 2025, the protocols related to the Agreement between the Ministry of the Interior, the CJA and the TUCJ were applied in 20 cases, which shows their functionality, but also the need for more consistent application in all situations. At the same time, the incident in the Rojc Community Centre in Pula, in which journalists were detained despite the fact that they themselves asked for police help, and the poorer education of some police officers in smaller communities, indicate shortcomings in the understanding of journalistic work and the need for further improvement of practice.



Process

Specialised investigation units and/or officers are equipped with relevant expertise for investigating attacks and violence against journalists



Investigations of serious physical attacks on journalists and other media actors are carried out efficiently (independently, thoroughly and promptly)



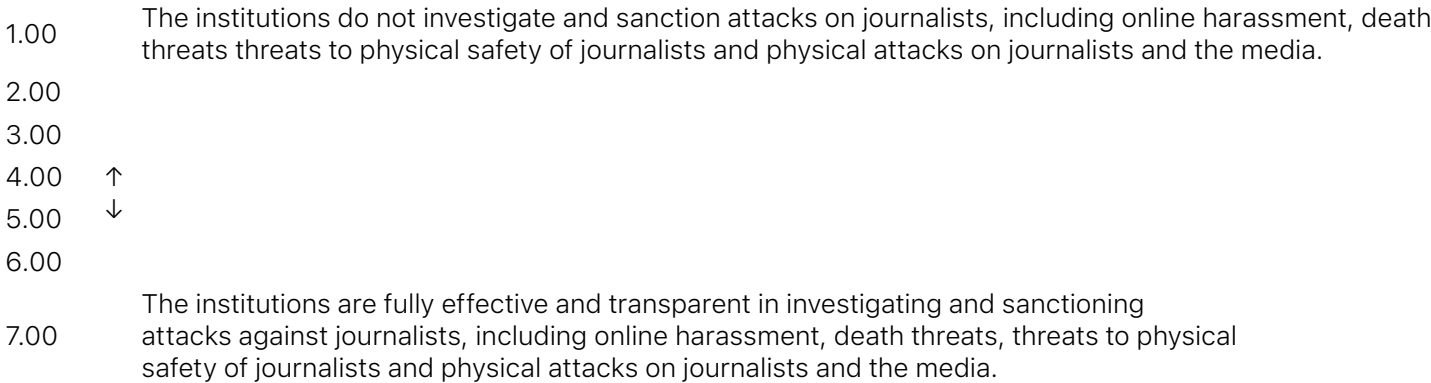
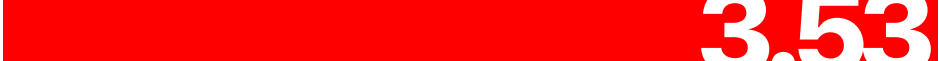
Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently



Investigations of all types of attacks and violence against journalists and other media actors are carried out transparently



Quality statistics collection systems established by state authorities to stem impunity



INDICATOR 3.1

— SPECIALISED INVESTIGATION UNITS AND/OR OFFICERS ARE EQUIPPED WITH RELEVANT EXPERTISE FOR INVESTIGATING ATTACKS AND VIOLENCE AGAINST JOURNALISTS

Score for 2024: 3.11 / Score for 2025: 3.31

The condition improved slightly. The increase in the rating reflects progress in educating and strengthening the capacity of police officers to act in cases of attacks on journalists, despite the absence of specialized units. It is crucial that targeted trainings were carried out during 2025, which included more than 180 journalists and 30 police managers, which improved the understanding of the specifics of journalistic work and the application of protocols in practice. At the same time, the lack of specialized departments and the lack of clear guidelines within the State Attorney's Office, along with the slowness of post-police procedures, point to structural weaknesses that continue to limit the effectiveness of the system.

INDICATOR 3.2

— INVESTIGATIONS OF SERIOUS PHYSICAL ATTACKS ON JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT EFFICIENTLY (INDEPENDENTLY, THOROUGHLY AND PROMPTLY)

Score for 2024: 3.34 / Score for 2025: 3.34

The situation remained unchanged compared to 2024. Although investigations are formally carried out by competent authorities thoroughly and using different investigative methods, effectiveness in practice varies depending on the case and stage of the procedure. There are examples of quick and efficient treatment, but also situations in which proceedings before the State Attorney's Office last for months or years, with limited transparency for victims. While attacks on journalists are legally recognised as criminal offences against persons carrying out tasks in the public interest, the uneven application of these provisions and the lack of clear visibility into the independence and breadth of investigations point to limitations in consistent and effective implementation.

INDICATOR 3.3

— JOURNALISTS AND OTHER MEDIA ACTORS ARE EFFICIENTLY PROTECTED FROM VARIOUS FORMS OF ONLINE HARASSMENT

Score for 2024: 2.81 / Score for 2025: 2.93

The condition improved slightly. The increase in the rating reflects the improvement of the legislative framework, in particular through the full application of the European Digital Services Act, which introduces clearer obligations for online platforms to deal with illegal content. Crucially, despite these developments, online harassment is still not recognised as a separate crime, and the anonymity of perpetrators and complex international cooperation

procedures make it difficult to effectively prosecute such cases. At the same time, a large number of threats and insults go unreported, as journalists often perceive them as part of their daily work, which further limits the actual level of their protection in the digital environment and leads to the impossibility of determining the true level of the problem.

INDICATOR 3.4

— INVESTIGATIONS OF ALL TYPES OF ATTACKS AND VIOLENCE AGAINST JOURNALISTS AND OTHER MEDIA ACTORS ARE CARRIED OUT TRANSPARENTLY

Score for 2024: 3.57 / Score for 2025: 3.57

The situation remained unchanged. While formal mechanisms exist to access information on the progress of investigations, transparency in practice remains limited and uneven. During the lengthy phase of verification of criminal complaints by the State Attorney's Office, victims often do not have insight into the progress of the procedure, and access to the file is possible only with the active participation and engagement of a legal representative. At the same time, the availability of information through courts and other authorities varies, in the absence of uniform practices, which further complicates timely information and reduces the overall level of transparency of proceedings.

INDICATOR 3.5

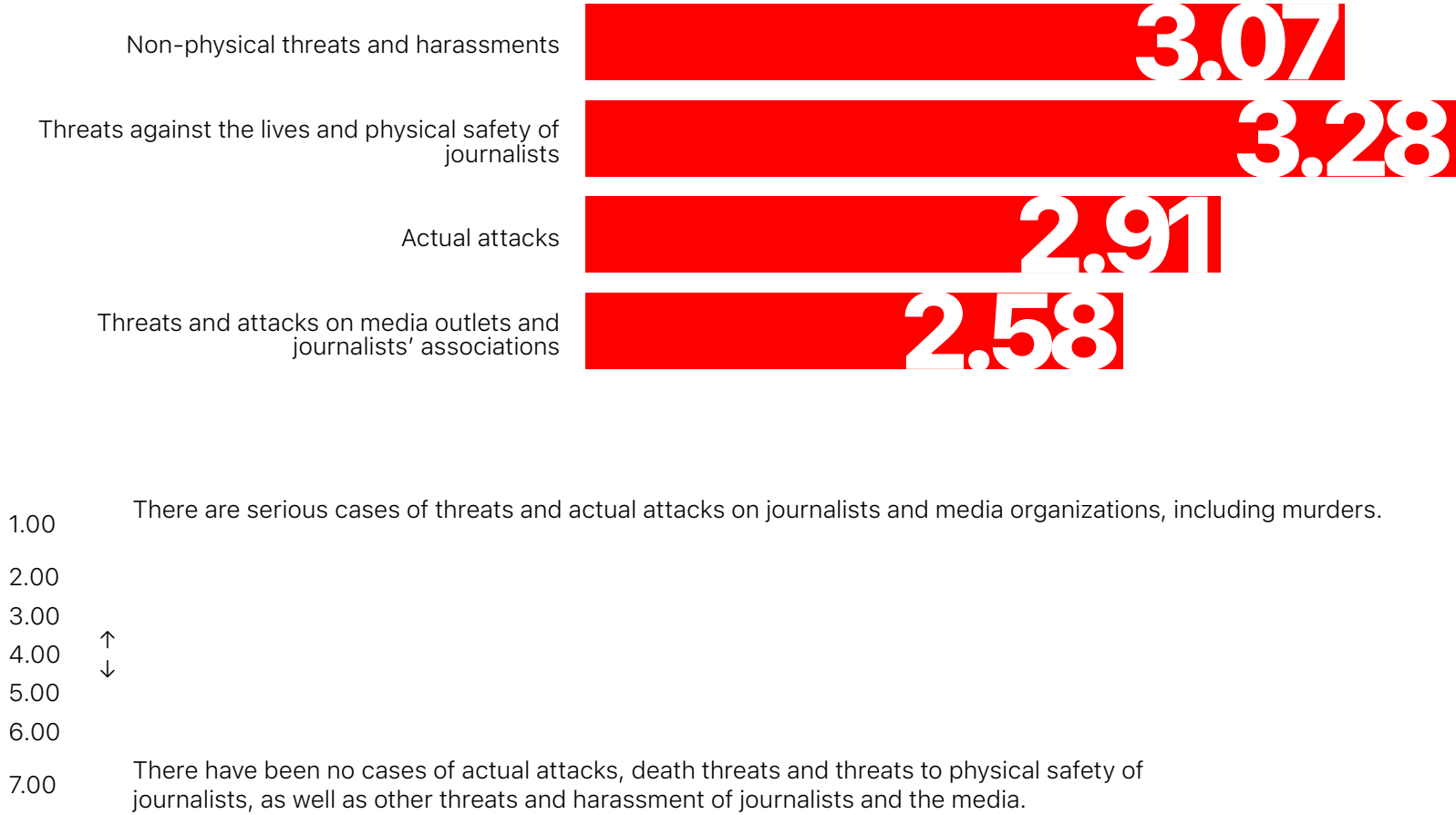
— QUALITY STATISTICS COLLECTION SYSTEMS ESTABLISHED BY STATE AUTHORITIES TO STEM IMPUNITY

Score for 2024: 3.53 / Score for 2025: 3.53

The situation remained unchanged. Although state authorities keep certain statistical records of cases related to journalists, the system of data collection and availability is still not fully developed or transparent. The data of the Ministry of the Interior and the Ministry of the Interior are not publicly available, but are submitted exclusively on request, while the State Attorney's Office does not provide statistical data even on request. At the same time, the data are mostly anonymized and insufficiently elaborated, without systematic monitoring of socio-demographic characteristics, although in the last two years there has been a slight shift through more detailed statistics of the Ministry of the Interior, including the division by gender.

IV.

Actual Safety



INDICATOR 4.1

— THREATS AND HARASSMENT THAT ARE NOT RELATED TO PHYSICAL SAFETY

Score for 2024: 3.13 / Score for 2025: 3.07

The condition worsened. The increase in the number of non-physical threats – from 8 in 2023, to 10 in 2024 and 13 in 2025 – in addition to the high number of unresolved cases from previous years, points to increasing pressure and an insufficiently effective response by the system. During 2025, journalists were exposed to various forms of harassment, including public targeting and publication of personal data, as in the case of journalist Matej Devčić, as well as discrediting and security threats through media campaigns, such as those aimed at Tomislav Kukec. At the same time, a number of concrete incidents – from online threats, graffiti and verbal attacks to denial of accreditation and institutional pressures – show that forms of non-physical harassment are expanding and becoming more diverse, further amplifying their chilling effect on journalistic work.

INDICATOR 4.2

— THREATS AGAINST THE LIVES AND PHYSICAL SAFETY OF JOURNALISTS

Score for 2024: 3.48 / Score for 2025: 3.28

The condition worsened. The sharp increase in threats of death and serious bodily injury, from 2 cases in 2024 to as many as 6 in 2025, indicates a deterioration in the security environment for journalists. It is crucial that threats are increasingly direct and public, including the case of journalist Gabrijela Radanović, who was faced with face-to-face threats while reporting in Split with references to the murder of Ivo Pukanić, which is a particularly severe form of intimidation. At the same time, cases such as graffiti with threats sent by Jurica Pavičić and Miljenko Jergović and online threats to journalists show that violence is increasingly manifested through public labeling and stigmatization, which further spreads the feeling of insecurity and pressure on journalists and their environment.

INDICATOR 4.3

— ACTUAL ATTACKS

Score for 2024: 2.93 / Score for 2025: 2.91

The condition worsened. The increase in the number of physical attacks from 4 in 2024 to 5 in 2025, along with the severity of the recorded incidents, indicates a continuation of the negative trend and a deterioration in security conditions for journalists. Crucially, the attacks included direct physical violence, such as the attack on journalist Melita Vrsaljko and the N1 crew, as well as the case in which journalist Danka Derifaj was physically attacked during the filming of the report. At the same time, incidents such as the arrest of the leading people of Radio Rojč by the police and the overnight detention of journalist Žada in the context of his work show that in addition to physical

violence, there are also forms of institutional treatment that further endanger the safety and freedom of journalists.

INDICATOR 4.4

— **THREATS AND ATTACKS ON MEDIA OUTLETS AND JOURNALISTS' ASSOCIATIONS**

Score for 2024: 2.56 / Score for 2025: 2.58

The condition improved slightly. The slight increase in the rating reflects a decrease in the total number of incidents, from 2 attacks and 7 threats in 2024 to 1 attack and 5 threats in 2025, but the level of risk remains significant. Crucially, the weekly Novosti was subjected to multiple pressures, including a threatening letter with a reference to "Novichok", direct death threats to the editorial office, and political and financial pressures through cuts and announcements of the cancellation of funding. At the same time, other forms of pressure have been recorded, such as bomb threats against Radio Nacional and selective treatment of N1, which shows that threats and attacks on media institutions continue to pose a serious challenge to media freedom and pluralism.

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