



EUROPEAN
COMMISSION

Brussels, 17.7.2026
COM(2026) 900 final

ANNEX

ANNEX

to the

**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN
PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL
COMMITTEE AND THE COMMITTEE OF THE REGIONS**

2026 Rule of Law Report

The rule of law situation in the European Union

RECOMMENDATIONS FOR BELGIUM

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the relevant commitments made under the Recovery and Resilience Plan, the Commission concludes the following:

- Some further progress has been made on the recommendation to address the structural resource deficiencies in the justice system, including a plan for additional financial resources. At the same time limited progress has been made to improve the efficiency of justice, in particular with a view to reducing the length of proceedings. As further work remains to be done it is recommended to Belgium to *continue ongoing efforts to address the structural resource deficiencies in the justice system and to step up ongoing efforts to improve the efficiency and digitalisation of justice, particularly with a view to reducing the length of proceedings, based on comprehensive statistical data.*
- No progress has been made on completing the legislative reform on lobbying, establishing a framework including a transparency register and a legislative footprint, covering both members of Parliament and Government. Since no steps have been taken to take this forward, it is recommended to Belgium to *resume work on a legislative reform to increase the transparency of lobbying for both members of Parliament and Government.*
- Limited progress has been made on strengthening the integrity framework by adopting rules on gifts and benefits for members of Parliament as there remains a lack of concrete guidance to members of Parliament on what type of gifts would be acceptable and no progress was made on adopting rules on revolving doors for members of Government and their private offices. As these gaps in integrity rules remain unaddressed, it is recommended to Belgium to *strengthen the integrity framework, including by adopting rules on gifts and benefits for members of Parliament and rules on revolving doors for members of Government and their private offices.*
- No further progress has been made on strengthening the framework for access to official documents, in particular by improving request and appeal processes, with relevant draft legislation still pending adoption and part of the existing legislative framework still awaiting implementation. It is thus recommended to Belgium to *continue efforts to strengthen the framework for access to official documents, in particular by improving request and appeal processes, by completing the legislative reform on this matter, taking into account European standards on access to official documents.*
- Limited progress has been made on ensuring compliance by public authorities with final rulings of national courts and the European Court of Human Rights. While Belgium continues to engage in the execution process, there are judgments remaining unimplemented and therefore, it is recommended to Belgium to *step up efforts to ensure compliance by public authorities with final rulings of national courts and the European Court of Human Rights.*

RECOMMENDATIONS FOR BULGARIA

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the relevant commitments made under the Recovery and Resilience Plan and the country-specific recommendation under the European Semester on the effectiveness of anti-corruption measures including the independence and effective functioning of the Supreme Judicial Council, and the independence and functioning of regulators, the Commission concludes the following:

- No progress has been made to adapt the legislative framework with a view to avoid long-term secondment of judges to fill in vacant positions, as the widespread use of secondments continues to raise concerns. Therefore, it is recommended to Bulgaria to *take steps to adapt the relevant legislative framework to avoid long-term secondment of judges to fill in vacant positions, taking into account European standards on secondment of judges.*
- No progress has been made to re-initiate the process to reform the Supreme Judicial Council. As the composition remains the same and no draft law has been tabled, it is recommended to Bulgaria to *reform the Supreme Judicial Council, in particular its composition, to ensure its independence and effectiveness, taking into account European standards on Councils for the Judiciary.*
- No progress has been made on ensuring a robust track record of investigations, prosecutions and final judgments in high-level corruption cases. Therefore, it is recommended to Bulgaria to *take measures to ensure a robust track record of investigations, prosecutions and final judgments in high-level corruption cases.*
- Some further progress has been made on ensuring the effective performance of the Anti-Corruption Commission through the adoption of a new law which re-establishes it and introduces a new procedure for the appointment of its leadership. It is thus recommended to Bulgaria to *ensure the full operationalisation of the Anti-Corruption Commission in order to enable the fulfilment of its preventive and investigative functions.*
- Limited progress has been made on improving the integrity of top executive functions, as a draft code of conduct has been prepared. As the related legislative amendments remain pending, it is recommended to Bulgaria to *continue efforts to strengthen the integrity of top executive functions, taking into account European standards, in particular by ensuring that clear integrity standards for the Government as well as an appropriate sanctioning mechanism are in place.*
- No progress has been made to improve the quality of the legislative process, as the practical implementation of the parliamentary rules for lawmaking continues to raise some concerns. Therefore, it is recommended to Bulgaria to *strengthen the quality of the legislative process by ensuring the use of public consultations and impact assessments for legislative initiatives by Parliament.*

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

- Parliament adopted the legislative reform aiming at improving the functioning of the Inspectorate to the Supreme Judicial Council and avoiding the risk of political influence. The pre-existing safeguard of a two-thirds majority, and the newly added role of the judges, prosecutors and investigative magistrates in the appointment of the ISJC members addresses the concerns linked to the risk of political influence in the ISJC. Therefore, the recommendation is fully implemented.
- Some progress has been made on completing the work aimed at improving transparency in the allocation of state advertising, in particular with regard to state advertising contracted through intermediaries, such as media agencies, as the legislative process has advanced. Given that the topics of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR CZECHIA

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the relevant commitments made under the Recovery and Resilience Plan, the Commission concludes the following:

- As efforts to further digitalise the justice system continued to face delays, it is recommended to Czechia to *advance the digitalisation of the justice system, in particular by putting into operation the electronic file system.*
- Some further progress has been made on taking further measures to reduce the length of proceedings and ensure independence of investigation and prosecution in high-level corruption cases as steps were taken to improve procedural aspects and investigations and prosecutions continue, including in high-level corruption cases. However, as the average length of such proceedings continues to be an issue, it is recommended to Czechia to *take further measures to reduce the length of proceedings and ensure independence of investigation and prosecution in high-level corruption cases, including by reforming the criminal procedure.*
- No progress has been made on taking further measures to strengthen the integrity framework for all members of Parliament, as the integrity framework of Parliament was not taken further. As gaps in the rules on revolving doors remain for most public officials, it is recommended to Czechia to *take further measures to strengthen the integrity framework, in particular by complementing the existing rules as regards revolving doors.*
- No progress has been made on reinitiating the revision of legislation on conflicts of interest, including as regards beneficial ownership as no steps were taken. Therefore, it is recommended to Czechia to *reinitiate the revision of legislation on conflicts of interest, including as regards beneficial ownership.*
- As the use of legislative procedures circumventing public and stakeholder engagement, inter-departmental review and impact assessment has become more frequent, it is recommended to Czechia to *take measures to improve transparency of the legislative process and meaningful consultation of stakeholders, including by addressing the frequent use of fast-track procedure and the practice of legislative riders.*

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

- No progress has been made on further reforms relating to transparency of information on media ownership given that draft legislation remains pending in parliament and no fully functional transparency register has been formally established. Given that the topics of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR DENMARK

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference, the Commission concludes the following:

- Limited progress has been made on the recommendation to finalise the review of the legal aid system, as the Judicial Council continues its work. It is therefore recommended to Denmark to *step up efforts to complete this review, taking into account European standards on legal aid.*
- No progress has been made to introduce rules on ‘revolving doors’ for ministers and on lobbying and ensure adequate control of asset declarations submitted by persons entrusted with top executive functions, with no plans to introduce such rules nor to improve control of asset declarations. Therefore, it is recommended to Denmark to *introduce rules on ‘revolving doors’ for ministers and on lobbying and ensure adequate control of asset declarations submitted by persons entrusted with top executive functions.*
- Some further progress has been made on the recommendation to advance with the reform of the Access to Public Administrative Documents Act as the expert committee continued its work with a view to such a reform, but no legislative proposal has been presented yet. Therefore, it is recommended to Denmark to *step up efforts to move forward with the reform of the Access to Public Administrative Documents Act, taking into account European standards on access to official documents.*

RECOMMENDATIONS FOR GERMANY

Overall, based on the recommendations in the 2025 Rule of Law Report and considering other developments that took place in the period of reference, the Commission concludes the following:

- Significant further progress has been made on increasing the resources of the judiciary and addressing recruitment challenges, through the new Pact for the Rule of Law and a joint campaign to attract qualified personnel. In view of addressing remaining challenges, it is recommended to Germany *to take forward the implementation of the Pact for the Rule of Law as regards both human resources and digitalisation and continue measures to address recruitment challenges, taking into account European standards on resources for the justice system.*
- No progress has been made to step up efforts to strengthen the ‘legislative footprint’ to provide a comprehensive public record to register lobbying input and to extend the scope to the parliamentary phase of the legislative procedure. As gaps remain, it is recommended to Germany *to step-up efforts to provide a comprehensive public record of lobbying input in the legislative process.*
- No further progress has been made on advancing with creating a legal basis for a right to information of the press as regards federal authorities, as internal preparations have not been pursued further. Therefore, it is recommended to Germany *to advance with creating a legal basis for a right to information of the press as regards federal authorities, taking into account European standards on access to official documents.*
- No progress has been made to adapt the tax-exempt status for non-profit organisations, which still affects civil society in practice. Therefore, it is recommended to Germany *to take steps to adapt the tax-exempt status for non-profit organisations with a view to addressing the challenges which the currently applicable rules present for the organisations’ operation in practice, taking into account European standards on funding for civil society organisations.*

RECOMMENDATIONS FOR ESTONIA

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- Limited progress has been made to continue the efforts to reform the Council for the Administration of Courts. Therefore, it is recommended to Estonia to *take steps to adapt the composition of the Council for the Administration of Courts, taking into account European standards on Councils for the Judiciary.*

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

- The recommendation to further advance with efforts to ensure consistent and effective implementation of the right of access to information taking into account European standards on access to official documents has been fully implemented, as the reform of the Public Information Act will enhance access to and the reuse of open data.

RECOMMENDATIONS FOR IRELAND

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- Some further progress has been made on reducing litigation costs, as the General Scheme of the Civil Reform Bill has been presented which introduces several key reforms aimed at reducing litigation costs. Since the reform remains to be adopted, it is recommended to Ireland to *finalise the legislative work aimed at reducing litigation costs to ensure effective access to justice, taking into account European standards on disproportionate costs of litigation and their impact on access to courts.*
- Limited further progress has been made to strengthen the existing ethics framework and to strengthen and digitalise the asset declarations system, with efforts to initiate the digitalisation of asset declarations being considered within the current framework. Since the ‘Ethics Reform Bill’ is still under preparation and the digitalisation of asset declarations under the current framework still needs to be implemented, it is recommended to Ireland to *continue efforts to strengthen the existing ethics framework, including the monitoring and enforcement capacity of the Standards in Public Office Commission, and to strengthen and digitalise the asset declarations system.*
- Limited progress has been made on addressing legal obstacles related to access to funding for civil society organisations, as the Electoral Commission continues to conduct a comprehensive review of the 1997 Electoral Act. It is recommended to Ireland to *continue ongoing efforts to tackle legal challenges regarding access to funding for civil society organisations, as part of the broader Electoral Act reform.*

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

- Significant progress has been made on completing the reform to provide funding for public service media that is appropriate for the realisation of its public service remit while guaranteeing its independence, in light of the adoption of the Broadcasting (Amendment) Bill. Given that the topics of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission’s support to Member States and enforcement of the EMFA.
- The recommendation on finalising the reform of the Defamation Act to improve the professional environment for journalists taking into account European standards on the protection of journalists has been fully implemented, in light of adoption of the necessary legislation.

RECOMMENDATIONS FOR GREECE

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

- Limited progress has been made in establishing a robust track record of prosecutions and final judgments in corruption cases, as the legal framework for a digital register of corruption cases has been set up and the register is expected to be operational on 1 January 2027; however, as the number of prosecutions and final judgments in corruption cases, including high-level corruption, remains low, it is recommended to Greece *to continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption.*
- There has been only limited progress in improving the lobbying framework, as no legislation expanding the definition of a lobbyist has been adopted while implementation measures and awareness raising activities are ongoing. Therefore, it is recommended to Greece *to improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation.*
- Some further progress has been made on strengthening legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, as additional measures have been taken and draft anti-SLAPP legislation is being finalised. Therefore, it is recommended to Greece *to complete the work on strengthening legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists.*
- Some further progress has been made in developing a structured dialogue with civil society organisations (CSOs), and in simplifying registration requirements in view of maintaining an open framework for them to operate, given that the framework for a structured dialogue with CSOs has been laid and some steps have been taken to reduce documentation requirements and streamlining procedures. Since the structured dialogue is yet to become regular and sustained and the registration framework remains fragmented, it is recommended to Greece *to intensify efforts to consolidate a regular and sustained structured dialogue with CSOs, and to simplify registration requirements in view of maintaining an open framework for them to operate.*

RECOMMENDATIONS FOR SPAIN

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

- Some further progress was made on adapting the procedure for appointing the Council for the Judiciary's judges-members, as the Council obtained guidance from the Venice Commission, but no consensus has been found on finalising the process. Since a reform remains to be adopted, it is recommended to Spain to *take forward the process of adapting the appointment procedure of the Council for the Judiciary's judges-members, taking into account European standards on Councils for the Judiciary, including the guidance of the Venice Commission on how to improve the current system.*
- Significant progress was made to strengthen the statute of the Prosecutor General, as a reform of the Code of Criminal Procedure is under discussion in Parliament. Since the reform remains to be adopted, it is recommended to Spain to *continue ongoing efforts to strengthen the statute of the Prosecutor General, in particular regarding the separation of the terms of office of the Prosecutor General from that of the Government, taking into account European standards on independence and autonomy of the prosecution.*
- Some progress was made to address the length of investigations and prosecutions of high-level corruption cases due to efforts to increase staffing and due to the tabled reform of the Code of Criminal Procedure. Since challenges remain and the draft legislation to increase efficiency is still under discussion in Parliament, it is recommended to Spain to *take forward the legislative process to revise the Code of Criminal Procedure to strengthen the framework for investigations and prosecutions in high-level corruption cases, with a view to reducing delays.*
- Limited progress was made to strengthen the rules on conflicts of interest and asset declarations of persons in top executive functions. Given that the draft Organic Law on Public Integrity has been tabled and the State Anti-Corruption Plan has been adopted, but practical implementation of the existing rules has not improved, it is recommended to Spain to *take forward the legislative process to strengthen rules on conflicts of interest and asset declarations of persons with top executive functions, and ensure independence and effective detection and sanctioning powers of the competent supervisory body.*
- Limited progress was made on lobbying, as the draft Law on the Transparency and Integrity of the Activities of Interest Groups has not yet been adopted by Parliament. It is recommended to Spain to *continue the ongoing procedure to adopt legislation on lobbying, including the establishment of a mandatory public register of lobbyists.*
- Significant progress was made on strengthening access to information, in particular via the revision of the Law on Official Secrets. Therefore, it is recommended to Spain to *complete the work on strengthening access to information, in particular via the adoption of the Law on Official Secrets and the Law on Open Administration, taking into account European standards on access to official documents.*

RECOMMENDATIONS FOR FRANCE

Overall, based on the recommendations in the 2025 Rule of Law Report and considering other developments that took place in the period of reference, the Commission concludes the following:

- Some further progress has been made on the digitalisation of judicial procedures. As this process has faced some delays, it is recommended to France to *step up efforts to complete ongoing projects aimed at digitalisation of civil and criminal court proceedings*.
- Some further progress has been made regarding the recommendation on lobbying, in particular through the strengthening of the transparency framework on foreign influence activities. As the obligation to disclose lobbying activities only applies to interests' representatives, it is recommended to France to *continue efforts to ensure the transparency of lobbying activities by extending the scope of the disclosure obligation, in particular to officials at top executive level*.

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

- Some further progress has been made to improve the transparency of media ownership, including through the development of a preliminary transparency database by the media regulator. Its full deployment remains dependent on the adoption of the necessary legislative measures. Given that the topics of this recommendation are covered by the provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR CROATIA

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

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

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

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

RECOMMENDATIONS FOR ITALY

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

- Significant further progress has been made on completing the digital case management system for criminal courts and prosecutors' offices, as the first-instance criminal trial workflow is now fully digitalised. Since some procedures remain to be digitalised, it is recommended to Italy to *complete the digital case management system in all instances*.
- There has been no further progress on the pending legislative proposal on conflicts of interest while limited progress has been made in adopting comprehensive rules on lobbying to establish an operational lobbying register as a draft law on lobbying was adopted in the Chamber of Deputies and is being assessed by the Senate. Therefore, it is recommended to Italy to *take forward legislative efforts to systematically regulate conflicts of interests and adopt comprehensive rules on lobbying and establish an operational lobbying register*.
- There has been no progress to address the practice of channelling donations through political foundations and associations and introduce a single electronic register for party and campaign finance information, as the draft laws tabled in Parliament have not been discussed yet. Therefore, it is recommended to Italy to *accelerate efforts to address the practice of channelling donations through political foundations and associations and introduce a single electronic register for party and campaign finance information*.
- There has been no progress in the legislative process on the draft reform on defamation, the protection of professional secrecy and journalistic sources. Therefore, it is recommended to Italy to *take forward the reform on defamation while guaranteeing press freedom, taking into account European standards on the protection of journalists*.
- Limited progress has been made to establish a National Human Rights Institution, as initial steps were taken to relaunch the initiative while various draft laws remain pending in Parliament. Therefore, it is recommended to Italy to *establish a National Human Rights Institution taking into account the UN Paris Principles*.

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

- Some further progress was made to ensure that rules or mechanisms are in place to provide funding for public service media that is appropriate for the realisation of its public service remit and to guarantee its independence, as parliamentary work on a reform bill has advanced. Given that the topics of this recommendation are covered by the provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR CYPRUS

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

- Limited further progress has been made on the reform of the Law Office and on establishing an effective review of decisions not to prosecute or discontinue proceedings. Since relevant draft legislation remains pending before Parliament, it is recommended to Cyprus *to finalise the ongoing reform of the Law Office and the establishment of the Office of the Public Prosecutor General and to establish an effective review of decisions not to prosecute or to discontinue proceedings, including for victimless offences, taking into account European standards on independence and autonomy of the prosecution.*
- The duration of court proceedings remains a serious concern and the establishment of an independent Court Service to streamline court administration faces delays. It is recommended to Cyprus *to take forward plans to establish an independent Court Service with a view to improving the efficiency of justice.*
- Significant progress has been made on the legislative reform to strengthen the Independent Authority against Corruption (IAAC) and to ensure it has the human and technical resources to effectively perform its task, as new legislation was adopted on recruitments. To ensure a fully effective IAAC, further measures remain necessary. To address this, it is recommended to Cyprus *to enhance the operational effectiveness of the IAAC.*

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

- Some progress has been made to (i) ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies and (ii) to strengthen the rules and mechanisms to enhance the independent governance of public service media, as draft legislation has been tabled. Given that the topics of these two recommendations are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.
- Significant progress has been made in introducing safeguards in the appointment procedure for the Auditor General and the Deputy Auditor General to enhance their independence, with establishing a fixed, non-renewable eight-year term and stricter qualification criteria for their appointment. Monitoring of further developments in this area will continue in the Rule of Law Report.

RECOMMENDATIONS FOR LATVIA

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference, and in addition to recalling the relevant commitments made under the Recovery and Resilience Plan, the Commission concludes the following:

- Some progress has been made to ensure adequate safeguards against undue political influence in the appointment procedure for Supreme Court judges, as a draft law allowing challenges to parliamentary decisions rejecting a candidate was published and submitted to Parliament for consideration. Since the reform remains to be adopted, it is recommended to Latvia to *take forward the legislative process to ensure adequate safeguards against undue political influence in the appointment procedure for Supreme Court judges, taking into account European standards on judicial appointments.*
- Limited progress has been made to ensure the effective implementation of the legislation on lobbying, as a temporary voluntary list of interest representatives was set-up. Since the establishment of the dedicated Register for Interest Representation has been delayed and the publicly available information remains limited, it is recommended to Latvia to *ensure the effective implementation of the legislation on lobbying, including as regards the special interim lobby register.*

RECOMMENDATIONS FOR LITHUANIA

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- Limited progress has been made to advance the reform of the legal aid systems, as discussions on the level of remuneration of legal aid providers were suspended and the envisaged changes to reduce the administrative burden for legal aid providers are planned to be launched in 2026. Therefore, it is recommended to Lithuania to *finalise the reform of the legal aid system, in particular by ensuring adequate conditions for the participation of legal aid providers, taking into account European standards on legal aid.*
- Some further progress has been made in stepping up efforts to improve the transparency of the system of appointments to judicial positions, notably to the Supreme Court, as the working group tasked with proposing possible changes to the system has presented its conclusions and proposed amendments are being prepared. Therefore, it is recommended to Lithuania to *step up efforts to improve the transparency of the system of appointments to judicial positions taking into account European standards on judicial appointments, in particular by following up on the proposals put forward by the working group created for this purpose.*

RECOMMENDATIONS FOR LUXEMBOURG

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- Some further progress has been made on the digitalisation of civil, criminal and administrative proceedings, as a management committee to coordinate digitalisation initiatives was established and milestones for civil, criminal, and administrative court proceedings were set and are being implemented. Since additional steps are needed to advance the digitalisation the justice system, it is recommended to Luxembourg to step up efforts to *further develop the digitalisation of civil, criminal and administrative proceedings*.
- Some further progress has been made to complete the reform of the legal framework for the disclosure of official documents, in light of further legislative work on the relevant reform. Therefore, it is recommended to Luxembourg to step up efforts to *finalise the reform of the legal framework on access to official documents, taking into account European standards*.

RECOMMENDATIONS FOR HUNGARY

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference, and in addition to recalling the obligation to comply with the rule of law-related rulings of the CJEU and the rule of law-related infringement procedures referred to in the country chapter, the Commission's assessment under the general regime of conditionality, the relevant concerns raised in the Article 7(1) TEU procedure initiated by the European Parliament, the relevant commitments made under the Recovery and Resilience Plan, and the country-specific recommendations under the European Semester on reinforcing the anti-corruption framework and the quality and transparency of the decision-making process, the Commission concludes the following:

- No progress has been made on the transparency of case allocation systems in lower-instance courts, as the previous government limited itself to addressing deficiencies in the rules on case allocation at the level of the *Kúria*. Therefore, it is recommended to Hungary to *improve the transparency of case allocation systems in lower-instance courts, taking into account European standards on case allocation*.
- No further progress has been made yet to ensure that the ongoing increase in the remuneration of judges, prosecutors and judicial and prosecutorial staff is carried out in a structured manner. Therefore, it is recommended to Hungary to *take measures to ensure that the ongoing increase in the remuneration of judges, prosecutors and judicial and prosecutorial staff is carried out in a structured manner, taking into account European standards on remuneration for the justice system*.
- As new legislation was adopted that further develops the system of asset declarations, the recommendation to further improve the system of asset declarations and provide for effective oversight and enforcement has been fully implemented. No progress has been made yet on putting forward comprehensive legislative reforms on lobbying and revolving doors. As these gaps in integrity rules remain unaddressed, it is recommended to Hungary to *strengthen the integrity framework by adopting comprehensive legislative reforms on lobbying and revolving doors*.
- No progress has been made on establishing a robust track record of investigations, prosecutions and final judgments for high-level corruption cases, given that the positive changes recently initiated in the anti-corruption framework have not yet come into effect. Therefore, it is recommended to Hungary to *take further measures to ensure a track record of investigations, prosecutions and final judgments for high-level corruption cases*.
- Some progress has been made to ensure that there are no obstacles hindering the work of civil society organisations and foster a safe and enabling civic space, given measures such as the abolition of the Sovereignty Protection Office were taken, while legislation hampering their capacity of working has not been repealed. Therefore, it is recommended to Hungary to *further ensure that there are no obstacles hindering the work of civil society organisations, including by repealing legislation that hampers their capacity of working, and to further foster a safe and enabling civic space*.

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

- Some progress has been made on introducing mechanisms to enhance the functional independence of the media regulatory authority taking into account European standards on the independence of media regulators, in the light of recent legislation which has introduced reforms in this area.
- No progress has been made yet to ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies, as no legislative or other measures have been proposed.
- Some progress has been made on strengthening the rules and mechanisms to enhance the independent governance and editorial independence of public service media taking into account European standards on public service media, in the light of recent legislation which has introduced reforms in this area.

Given that the topics of the three recommendations above are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR MALTA

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

- There has been no further progress on the tabled reform to involve the judiciary in the procedure for the appointment of the Chief Justice, as the political debate continued. As the reform is still pending, it is recommended to Malta to *take forward reforms with a view to involve the judiciary in the procedure for the appointment of the Chief Justice, taking into account European standards on judicial appointments.*
- No further progress has been made on stepping up efforts to improve the efficiency of justice, particularly to reduce the length of proceedings, which remains a concern. Therefore, it is recommended to Malta to *take forward initiatives to increase resources, reform court procedures, and advance digitalisation with a view to improve the efficiency of justice.*
- Limited progress has been made to address challenges related to the length of investigations of high-level corruption cases, as the Police and the Attorney General continued to increase their resources and launched new investigations and prosecutions. No progress has been made on establishing a robust track record of final judgments given the high backlog of pending court cases, judges' workload and the limited team of four magistrates handling preliminary inquiries. Therefore, it is recommended to Malta to *step up efforts to address challenges related to the length of investigations of high-level corruption cases, and to establish a robust track record of final judgments.*
- Limited progress has been made on adopting further legislative and other safeguards to improve the working environment of journalists, including on access to official documents, in light of a public consultation having been carried out and an e-management system having become operational. Since challenges persist, it is recommended to Malta to *adopt legislative safeguards to improve the working environment of journalists and access to documents, taking into account European standards on the protection of journalists and on access to official documents.*
- Limited progress has been made on introducing a formal framework for public participation in the legislative process, as the Government established a Department of Public Consultation. Since legislative reforms remain pending, it is recommended to Malta to *introduce a formal framework for public participation in the legislative process.*
- No progress has been made on taking forward measures to establish a National Human Rights Institution taking into account the UN Paris Principles, as a bill remains under preparation. Therefore, it is recommended to Malta to *establish a National Human Rights Institution taking into account the UN Paris Principles.*

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

- Some progress has been made on strengthening the rules and mechanisms to enhance the independent governance and editorial independence of public service media taking into account European standards on public service media, in light of the enactment of legislation addressing certain aspects of this issue. Given that the topics of this recommendation are covered by the provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR THE NETHERLANDS

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- Limited progress has been made to establish stricter transparency rules on lobbying for members of the Government and Parliament, as the Government announced its intention to introduce a transparency register. It is recommended to the Netherlands to *put in place legislative provisions to establish stricter transparency rules on lobbying for members of the Government and Parliament*.
- Some progress has been made on taking forward the planned reform of public service media to enhance its governance and its ability to uphold journalistic standards, with preparatory work ongoing for the reform of public service media and with a draft law on local public broadcasters currently before Parliament. Given that parts of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA. In light of this, it is recommended to the Netherlands to *take forward its work in relation to the upholding of journalistic standards by public service media*.

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

- Significant progress has been made on improving working conditions in the justice system and addressing staff shortages as additional funds were made available and workload reduction measures started to bear fruit. Monitoring of further developments in this area will continue in the Rule of Law Report.
- Some further progress has been made on taking forward the proposals of the State Commission on Rule of Law to strengthen a rule of law culture due to the availability of additional funds and a willingness to continue the dialogue between state powers. Monitoring of further developments in this area will continue in the Rule of Law Report.

RECOMMENDATIONS FOR AUSTRIA

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- No progress has been made to address the need for involvement of the judiciary in the appointment of administrative court (vice-)presidents. Therefore, and in view of persisting concerns, it is recommended to Austria to *step up efforts to address the need for involvement of the judiciary in the procedures for appointment of court presidents of administrative courts, taking into account European standards on judicial appointments and the selection of court presidents.*
- Some progress has been made on establishing an independent Federal Prosecution Office, as a draft reform has been presented and submitted to public consultation. Therefore, it is recommended to Austria to *take forward the reform to establish an independent Federal Prosecution Office, taking into account European standards on the independence and autonomy of the prosecution, including to ensure the independent operation of the specialised anti-corruption prosecution.*
- No further progress has been made to introduce rules on the disclosure of assets and interests for Members of Parliament as no steps were taken under the new legislative period to advance the matter since the last discussion of parliamentary groups on the introduction of such rules in May 2025. Therefore, it is recommended to Austria to *introduce effective rules on assets and interests' declaration for Members of Parliament, including effective monitoring and sanctioning mechanisms.*
- No progress has been made to strengthen the lobbying framework as no steps have been taken to extend the scope of application of the lobbying legislation and the obligations to share information publicly in the transparency register. Therefore, it is recommended to Austria to *adopt a legislative proposal to strengthen the framework on lobbying, including the transparency register.*

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

- Significant progress has been made to take steps to ensure proper implementation and enforcement as regards the fair distribution of state advertising, in light of the adoption of legislation and government guidelines regulating the matter. Given that the topics of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR POLAND

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the obligation to comply with the rule of law-related rulings of the Court of Justice of the EU and the rule of law related infringement procedure referred to in the country chapter as well as recalling the relevant commitments made under the Recovery and Resilience Plan, the Commission concludes the following:

- Some further progress has been made on the implementation of the Action Plan on the Rule of Law, including as regards the National Council for the Judiciary and the Constitutional Tribunal, as the Government continued its work on draft laws aimed at strengthening judicial independence, and as judges-members of the National Council for the Judiciary have been appointed, including in majority from among judges pre-selected by their peers. Therefore, it is recommended to Poland to *continue the process of the Action Plan's implementation*.
- Limited further progress has been made on the recommendation to take forward the reform to separate the office of the Minister of Justice from that of the Prosecutor General and to ensure functional independence of the prosecution service from the Government as further progress now depends on legislative work that is ongoing as regards sub-statutory provisions that would adjust the functioning of prosecutorial units within the envisaged new system. Therefore, it is recommended to Poland to *take forward the reform to separate the function of the Minister of Justice from that of the Prosecutor-General and to ensure functional independence of the prosecution service from the Government*.
- No progress has been made to introduce rules on lobbying, and limited progress has been made on a standardised online system for asset declarations of public officials and members of Parliament, as the government has announced its intention to reform the system. Therefore, it is recommended to Poland to *introduce rules on lobbying and a standardised online system for asset declarations of public officials and members of Parliament while ensuring effective verification*.
- Some further progress has been made in ensuring independent and effective corruption investigations and prosecutions, while no progress has been made on addressing the broad scope of immunities for top executives and remove impunity clauses. Therefore, it is recommended to Poland to *continue efforts to ensure independent and effective corruption investigations and prosecutions, address the broad scope of immunities for top executives and remove impunity clauses to enable a robust track record of high-level corruption cases*.
- Some further progress has been made to ensure that fair, transparent and non-discriminatory procedures are adhered to for the granting of operating licences to media outlets, as a draft bill has been presented and undergone the public consultation. Therefore, it is recommended to Poland to *continue progress on these legislative efforts to finalise reforms to ensure that fair, transparent and non-discriminatory procedures are adhered to for the granting of operating licences to media outlets*.

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

- Some further progress has been made on taking forward reforms to ensure an effective legislative framework for the independent governance and editorial independence of public service media, as a draft bill has been presented and undergone the public consultation. Given that the topics of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.
- Some further progress has been made to improve the framework in which civil society operates, taking into account European standards on civil society organisations, as legislative work is ongoing to amend the law governing public benefit activities and volunteering. Monitoring of further developments in this area will continue in the Rule of Law Report.

RECOMMENDATIONS FOR PORTUGAL

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

- There has been no further progress to improve the efficiency of the justice system, in particular of Administrative and Tax Courts, as the efficiency of these courts has further deteriorated. Therefore, also in view of concerns that the deteriorating conditions and security in court and prosecution premises are affecting the functioning of courts, it is recommended to Portugal to *step up efforts to improve the efficiency of the justice system, including by ensuring adequate infrastructure and equipment in court and prosecution buildings.*
- As challenges persist in ensuring a comprehensive level of digitalisation, it is recommended to Portugal to *take further steps to improve the digitalisation of justice, including by improving the online publication and digital accessibility of judgments and addressing the problems affecting the case management system.*
- Some progress has been made on the regulation of lobbying, as a law on lobbying was adopted. As further implementation steps are needed and a lobbying register remains to be set up, it is recommended to Portugal to *ensure the creation and swift operationalisation of the public lobbying registry, including by providing the necessary resources for its effective functioning.*
- Some progress has been made towards finalising the reforms to improve the transparency of law-making, particularly on the implementation of impact assessment tools, as new measures are being implemented by Parliament, while steps are still pending for the implementation of the ‘legislative footprint’ system, and stakeholder engagement in Government legislative initiatives and ex post impact assessments remains limited. Therefore, it is recommended to Portugal to *improve the transparency of law-making at Government level, particularly on the implementation of impact assessment tools.*

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

- Significant progress has been made in taking forward measures to ensure the adequacy of the general criminal procedure legislation to efficiently deal with complex criminal proceedings, as new measures to improve efficiency in complex criminal procedures are under discussion in Parliament. Monitoring of further developments in this area will continue in the Rule of Law Report.

RECOMMENDATIONS FOR ROMANIA

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

- The Justice Laws continue to be implemented and have contributed to improving the legislative framework for the independence and functioning of the judiciary, while a reflection on various aspects related to the judiciary has been put on hold following a decision of the High Court of Cassation and Justice. It is therefore recommended to Romania to *take forward the evaluation of the implementation of the Justice Laws in close consultation with relevant stakeholders, including as regards measures to further improve the effectiveness and governance of the judiciary.*
- There has been no progress yet to strengthen safeguards to ensure the independence of high-ranking prosecutors and for the organisation and functioning of the judicial police, as the reflection on various aspects related to the judiciary has been put on hold. It is therefore recommended to Romania to *step up the legislative work to strengthen safeguards to ensure the independence of high-ranking prosecutors and for the organisation and functioning of the judicial police.*
- There has been no further progress to ensure the effective investigation and prosecution of corruption offenses in the judiciary, as no measures were taken to address remaining shortcomings. It is recommended to Romania to *take measures to ensure effective investigation and prosecution of criminal offences in the judiciary, including as regards corruption offences.*
- The recommendation to introduce rules on lobbying for members of Parliament has been fully implemented as a new law was adopted in November 2025 which obliges deputies and senators to register meetings with third parties on legislative initiatives. Some progress has been made to ensure the effectiveness of the asset declaration system, with a draft law which aims to update the existing integrity legal framework. Therefore, it is recommended to Romania to *complete the legislative process to ensure the effectiveness of the asset declaration system.*
- Some further progress has been made on the frequent use of government emergency ordinances and effective public consultations, while a number of shortcomings remain in practice. It is therefore recommended to Romania to *step up efforts to address the frequent use of government emergency ordinances and to ensure effective public consultations before the adoption of legislation.*
- There has been no progress on the accreditation of National Human Rights Institutions, as a decision remains pending, and the Government has not solved compliance issues with the Paris Principles of two organisations it proposed as National Human Rights Institutions. It is therefore recommended to Romania to *take forward the process for obtaining accreditation for the National Human Rights Institutions, taking into account the UN Paris Principles.*

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

- Limited progress has been made strengthening the rules and mechanisms to enhance the independent governance and editorial independence of public service media, in light of the establishment of an interministerial working group on the matter. Given that the topics of this recommendation are covered by the provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR SLOVENIA

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the relevant commitments made under the Recovery and Resilience Plan, the Commission concludes the following:

- There has been limited further progress on ensuring a track record of investigations, prosecutions and final judgments in corruption offences, as results remain modest in investigating and moderate in prosecuting and reaching final judgments, including as regards high-level corruption, although some efforts to strengthen capacities of state prosecution offices are ongoing. Therefore, it is recommended to Slovenia to *take further measures to ensure a track record of investigations, prosecutions and final judgments in corruption offences, including in high-level cases.*
- Some further progress has been made to further advance with the process of adopting legislative and non-legislative safeguards to improve the protection of journalists, as the Act on Protective Measures against Strategic Lawsuits Against Public Participation and the Media Act have been adopted, while challenges remain. Therefore, it is recommended to Slovenia to *broaden the range of available safeguards to improve the protection of journalists, taking into account European standards on the protection of journalists.*

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

- Limited further progress has been made on completing reforms to ensure that the rules or mechanisms are in place to provide funding for public service media that is appropriate for the realisation of its public service remit while guaranteeing its independence, as the financial challenges of the STA have been addressed, while those of the RTV improved to a limited extent. Given that the topic of this recommendation is covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR SLOVAKIA

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference and in addition to recalling the rule of law-related infringement procedure referred to in the country chapter, relevant commitments made under the Recovery and Resilience Plan and the country-specific recommendation under the European Semester on the judicial system, including its independence, and the effectiveness of the anti-corruption framework, the Commission concludes the following:

- Some progress was made on measures to ensure sufficient guarantees of independence as regards the dismissal of Judicial Council's members, as draft amendments were prepared to address the issue of their premature dismissal. As the legislative process is ongoing, it is recommended to Slovakia to *advance with reforms to ensure sufficient guarantees of independence for the Judicial Council, including as regards the dismissal of its members, taking into account European standards on independence of Judicial Councils*.
- Significant progress was made on ensuring that sufficient safeguards are in place and observed when subjecting judges to criminal liability for "abuse of law" in their judicial decisions, as the government requested a Venice Commission opinion on this matter. Following this Opinion and approved changes to the Slovak Recovery and Resilience Plan, the Ministry of Justice proposed a draft law abolishing this offence. In view of the adjustments made to Slovakia's Recovery and Resilience Plan, it is recommended to Slovakia to *take the necessary steps to repeal the crime of "abuse of law"*.
- No progress was made on effectively investigating and prosecuting high-level corruption to establish a robust track record, as concerns over the anti-corruption framework persist and the capacity to detect, investigate and prosecute high-level corruption has further deteriorated. Given a significant decline in the number of charges, indictments and convictions in corruption cases and the Prosecutor General's continued practice to annul final police and prosecutor decisions, it is recommended to Slovakia to *establish a robust track record in corruption offenses, in particular in high-level cases, including by preventing any undue interference and restricting the use of the Prosecutor-General's powers to annul final investigatory and prosecutorial decisions*.
- Limited progress was made on regulating lobbying activities, as initial steps were taken in preparing a draft law and some further progress was made to reform conflicts of interest rules as a non-binding code of conduct for persons with top executive functions and a code of conduct for members of parliament were adopted. However, no progress was made to strengthen the asset declaration system. It is therefore recommended to Slovakia to *introduce proposals to regulate lobbying, strengthen the asset declaration and verification system, and continue ongoing efforts to reform conflicts of interest rules*.
- Limited progress was made on advancing with establishing legislative and other safeguards to improve the journalists' physical safety and working environment, including the reform of the defamation law. Therefore, it is recommended to Slovakia to *advance with the process to establish legislative and other safeguards to improve the physical safety and working environment of journalists, including the reform of the defamation law, taking into account the European standards on the protection of journalists*.
- No progress has been made to ensure effective public consultation and stakeholders' involvement in the law-making process, which continues to raise concerns. Therefore, it is recommended to Slovakia to *ensure an inclusive and transparent legislative process, including by ensuring effective public consultation and stakeholder involvement in the law-making process and by addressing the frequent use of the fast-track procedure*.

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

- No progress has been made on strengthening the rules and mechanisms to restore and further safeguard the independent governance and editorial independence of public service media taking into account European standards on public service media. Given that the topics of this recommendation are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

RECOMMENDATIONS FOR FINLAND

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference, the Commission concludes the following:

- Limited progress has been made on the recommendation related to the appointment of lay judges, as the working group on Rule of Law Guarantees and Development of the Judicial System continues to examine the issue and is expected to publish a memorandum of its work by end of 2026. It is therefore recommended to Finland to *advance the reform of the system of lay judges, taking into account European standards on judicial independence*.
- As gaps remain in the digitalisation of judicial proceedings, it is recommended to Finland to *take further steps to improve the digitalisation of justice, including by improving the availability of digital tools to initiate and follow proceedings online*.
- Some progress has been made on strengthening the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions, as post-employment rules for members of the Government were adopted and the Anti-Corruption Strategy and Action Plan envisage compiling the key anti-corruption and integrity promotion guidelines for ministers into a dedicated single document in 2026. Since the adoption of the code of conduct is still pending, it is recommended to Finland to *strengthen the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions by adopting a code of conduct for them*.
- Limited progress has been made on advancing with the reform of the Act on the Openness of Government Activities, as two studies are being commissioned and a working group is expected to be set up to prepare a legislative proposal. Since the reform remains under review, it is recommended to Finland to *advance with the reform of the Act on the Openness of Government Activities to ensure effective access to documents taking into account the European standards on access to official documents*.

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

- Limited progress has been made on the recommendation to take forward the revision of the criminal offence of foreign bribery, as a working group was set up to draft the relevant legislation in the context of transposing the EU Anti-Corruption Directive. Monitoring of further developments in this area will continue in the Rule of Law Report.

RECOMMENDATIONS FOR SWEDEN

Overall, based on the recommendations in the 2025 Rule of Law Report, and considering other developments that took place in the period of reference, the Commission concludes the following:

- No progress has been made on ensuring that the nomination system of lay judges safeguards their independence, as no measures have been introduced. As a national debate over political parties' role in nominations and its impact on lay judges' independence continues, it is recommended to Sweden to *take measures to safeguard the independence of lay judges as regards their nomination and functioning, taking into account European stands on judicial independence.*
- Some progress has been made on the fight against foreign bribery, as draft legislation introduces some relevant provisions. Since its adoption is pending and prosecution of these offences has not improved, it is recommended to Sweden to *strengthen the fight against foreign bribery, including by improving enforcement.*
- No progress has been made to follow up on the inquiry on rules on revolving doors. As no measures are planned in this regard, it is recommended to Sweden to *ensure an appropriate follow-up to the evaluation of the rules on revolving doors.*