

Independent Reporting Mechanism

Action Plan Review:
Croatia 2022–2023

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Introduction

In January 2021, the Independent Reporting Mechanism (IRM) rolled out the new products that resulted from the IRM Refresh process.¹ The new approach builds on the lessons learned after more than 350 robust, independent, evidence-based assessments conducted by IRM and inputs from the Open Government Partnership (OGP) community. IRM seeks to put forth simple, timely, fit for purpose, and results-oriented products that contribute to learning and accountability in key moments of the OGP action plan cycle.

IRM products are:

- **Co-Creation Brief:** Brings in lessons from previous action plans, serves a learning purpose, and informs co-creation planning and design.
- **Action Plan Review:** A quick, independent technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning. This product was rolled out in a transition phase in 2022, beginning with action plans ending implementation on 31 August 2022. Results Reports are delivered up to four months after the end of the implementation cycle.

This product consists of an IRM review of the Croatia 2022–2023 action plan. The action plan comprises 16 commitments. This review emphasizes its analysis on the strength of the action plan to contribute to implementation and results. For the commitment-by-commitment data, see Annex 1. For details regarding the methodology and indicators used by IRM for this Action Plan Review, see Section III.

¹ IRM Refresh: <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>

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Section I: Overview of the 2022–2023 Action Plan

Croatia’s fourth action plan contains two promising reforms on improving transparency of media ownership and adopting a lobbying act for the first time. Administrative delays and political limits to the co-creation process negatively affected the ambition of the action plan overall and enthusiasm for the OGP process more generally. Guaranteeing relevant civil society input in drafting the lobbying act would improve implementation and help build civil society trust in government.

Croatia’s fourth OGP action plan contains 16 commitments. Two of these are promising commitments building on previous action plans to improve media transparency and introduce a new anti-corruption strategy and lobbying legislation.

Most commitments incrementally build upon the previous action plan, focused on increasing transparency of parliament, financial information, civil society funding, publicly owned companies, and official documents; whistleblower protection; opening up data; improving consultation processes; and stimulating open government at the local and regional levels. New themes pursued by the action plan deal with protection of personal data (linked with the implementation of the European Union’s [EU] General Data Protection Regulation [GDPR] legislation) and improving the transparency of state asset management.

Overall, this action plan is less ambitious than previous action plans, with almost half of all commitment milestones aimed at stakeholder education and training activities, or awareness-raising on different topics for the public. As in previous action plan cycles, government and civil society stakeholders have pointed to administrative constraints (such as rigid legal or procedural issues) and a lack of political ownership as reasons for decreasing ambition in action plans.² Furthermore, despite the relatively large number of Multi-Stakeholder Forum (MSF) members, there were few different or new policy areas proposed for inclusion in the action plan.

AT A GLANCE

Participating since: 2011
Action plan under review: 2022–2023
IRM product: Action plan review
Number of commitments: 16

Overview of commitments:

Commitments with an open government lens: 16 (100%)
 Commitments with substantial potential for results: 2 (12.5%)
 Promising commitments: 2

Policy areas:

Carried over from previous action plans:
 Policy area 1. Access to information
 Policy area 2. Media legislation
 Policy area 3. Whistleblower protection
 Policy area 4. Open data
 Policy area 5. Public consultation
 Policy area 6. OGP at local/regional level
 Policy area 7. Anti-corruption
 Policy area 8. OGP sustainability

Emerging in this action plan:
 Policy area 1. Personal data protection
 Policy area 2. State assets

Compliance with OGP minimum requirements for co-creation: No

During development of the action plan, the MSF—made up of 27 civil society members and government officials—engaged the wider public twice via the e-consultation portal: the first to gauge which priority activities should be undertaken in the new action plan, and the second to receive feedback on the draft action plan. However, the co-creation process ground to a standstill while the competent body³ deliberated on how to deal with the OGP action plan, as it falls outside of the scope of the country's new strategic planning framework.⁴ The delay in adopting the plan led the country to be found acting contrary to OGP process⁵ and increased civil society fatigue with the development of the action plan.⁶

For Croatia's co-creation process to meet the minimum requirements of the OGP Participation and Co-Creation Standards, it needs to ensure MSF meetings happen at least every six months, a two-week notice outlining a timeline of the development of any new action plan is published online, and there are outreach activities outside the MSF to provide information on OGP and the action plan process.

The two promising commitments identified in this review generate binding and institutionalized changes by improving media legislation, fighting disinformation, and introducing anti-corruption measures (in particular by introducing the law on lobbying). For the rest of the action plan, 13 commitments have modest potential for results and one is unclear.

Drafting the new Media Act and improving legal provisions on transparency of media ownership were carried over from the last action plan. Civil society representatives expressed some reservations regarding the drafting process and results of a new Media Act, given previous experiences in this policy area, and they agree it is an ambitious undertaking. It is important the legislation reinforces the legal framework to protect the rights of journalists and independent media. Furthermore, addressing concerns over the accuracy of information held by the "real" owners of media outlets would help to ensure ambitious implementation of this commitment.

The commitment on anti-corruption would lead to a new two-year action plan to accompany the Anti-Corruption Strategy 2021–2030 and drafting a law on lobbying transparency and regulation. The lobbying transparency reform is important, as the sector is largely unregulated despite many attempts by the lobbying community, relevant experts, civil society organizations (CSOs), and other stakeholders. It follows one of the key IRM recommendations from the last action plan cycle (to regulate lobbying and monitor the legislative footprints of Members of Parliament (MPs), government, and other officials). Such reform would benefit from bringing in relevant stakeholders with expertise in transparency and open governance to draft the lobbying act, ensuring a broad definition for lobbying, and to introduce open agendas for senior government officials and representatives.

² The administrative constraints include rigid legal or administrative procedures, such as the obligatory gathering of official approval from each public authority involved in drafting any legislation or policy act, and the recently introduced process of fiscal impact assessment, which is compulsory for public authorities when creating commitments with potential budgetary impacts. Also, as Croatia has established a comprehensive institutional and legislative framework in the area of strategic planning, the co-creation process ground to a standstill while the competent body deliberated on how to deal with the OGP action plan, as it falls outside the scope of that framework. The political constraints were detected in previous IRM reports; specifically, a lack of a sense of ownership over the OGP process at higher levels of government. See the *IRM Croatia Design Report 2018–2020*: <https://www.opengovpartnership.org/documents/croatia-design-report-2018-2020/>; *IRM Croatia Transitional Results Report 2018–2020*: <https://www.opengovpartnership.org/documents/croatia-transitional-results-report-2018-2020/>

³ The Ministry of Regional Development and EU Funds is the coordinating body for strategic planning and development management, in line with the Law on Strategic Planning and Development Management (OG 123/2017), https://narodne-novine.nn.hr/clanci/sluzbeni/2017_12_123_2798.html.

According to the internal e-consultation report, a positive result of this deliberation occurred when the Ministry of Regional Development and EU Funds issued the following opinion: "... all state administrative bodies responsible for drafting strategic planning acts must take care that the content of these acts does not contradict the international obligations that the Republic of Croatia has assumed based on its membership in the OGP initiative." This means that the values that Croatia, as an OGP participating country, has promised to uphold must be taken into consideration and/or integrated into each act of strategic planning at national, regional, and local levels and their subsequent goals, measures, and activities.

⁴ Internal e-consultation report and Darija Marić (Government Office for Cooperation with NGOs), online interview by IRM researcher, 15 September 2022.

⁵ OGP informed the Croatian government on 15 February 2022 that it has acted contrary to the OGP process and was considered to have started a new action plan cycle, https://www.opengovpartnership.org/wp-content/uploads/2022/02/Croatia_Contrary-to-Process-Letter_February2022.pdf

⁶ Darija Marić (Government Office for Cooperation with NGOs), online interview by IRM researcher, 15 September 2022; Melisa Skender (Gong), online interview by IRM researcher, 19 September 2022; Miroslav Schlossberg (HrOpen), phone interview by IRM researcher, 5 October 2022. Mr. Schlossberg withdrew from the OGP Council in 2021, in part due to these issues.

Section II: Promising Commitments in Croatia's 2022–2023 Action Plan

The following review looks at the two commitments that IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

Table 1. Promising commitments

Promising Commitments
<p>Commitment 8. Media Regulatory Framework: The commitment aims to ensure greater transparency and independence of Croatian media. It involves legislative changes, such as to draft the Media Act, increase transparency of media ownership, and establish a media fact-checking system.</p>
<p>Commitment 12. Improving Anti-Corruption Legislation: The commitment seeks to operationalize the new Anti-Corruption Strategy 2021–2030 through a three-year action plan and regulate a specific area of anti-corruption by drafting new legislation, the Lobbying Act.</p>

Commitment 8. Media Regulatory Framework (*Ministry of Culture and Media, Agency for Electronic Media*)

For a complete description of the commitment, see commitment 8 in Croatia's action plan: <https://www.opengovpartnership.org/documents/croatia-action-plan-2022-2024/>.

Context and objectives

Croatia, with a population of less than four million, enjoys a modestly sized but diverse media sector. There are half a dozen national daily newspapers but with concentrated ownership (two media companies control three-quarters of the market). Two major private television networks provide national coverage, competing with the Croatian public broadcaster (HTV), while most radio stations are only present locally.⁷

Even though Croatia has risen in World Press Freedom Index rankings in the past several years,⁸ national and international reports and indexes on media freedoms in Croatia note political interference at public broadcaster HRT, increasing public intimidation of critical media, continued impunity for physical attacks against journalists, the use of criminal slander and libel legislation (strategic lawsuit against public participation [SLAPP] lawsuits) to silence investigative journalism, and a reduced arena for media pluralism, including minority and nonprofit media.⁹

In this context, the commitment aims at ensuring greater transparency and independence of Croatian media through changes to the Media Act (Milestone 8.1) to reflect issues in the digital sphere, improving legal provisions to make transparent media ownership and media funding sources (8.2) and establishing a fact-checking system to fight disinformation in the media and improve media literacy (8.3). The responsible authority is the Ministry of Culture and Media,

with over 15 other public institutions, companies, and CSOs, including fact-checking experts, listed as “other participating actors.”

Except for establishing a media fact-checking system, the other two milestones in this commitment were for the most part copied directly from the previous action plan, as they were not implemented in the envisaged time period.¹⁰ This commitment also builds upon milestones from Croatia’s second OGP action plan,¹¹ two of which were aimed at increasing media transparency via legislative changes. The commitment is also part of Croatia’s Recovery and Resilience Plan.¹²

Potential for results: Substantial

Conditions in the media landscape have been a contentious issue ever since Croatia’s democratic transition started, so a large-scale legislative overhaul is an opportunity for positive change.¹³ The government can demonstrate its dedication to open government values through implementation of this commitment, as ensuring media independence and plurality is a tenet of a functioning democracy. While the actions that would open up government-held information are more likely to have modest results, implementation could have a more substantial impact on the transparency and accountability of the media landscape in Croatia.

The last amendment of any significance to the Media Act took place in 2013.¹⁴ There is an understandable need to revise the existing regulation, as the media landscape has changed profoundly since the act was originally adopted back in 2004. As the process is still in early stages, there is no concrete information on what the changes to the Media Act would entail. However, according to the action plan, the changes will include supporting all media (public, commercial, electronic and print, and nonprofit), the sustainability of media products with contents of public interest, journalism ethics and standards, editorial accountability, media financing, as well as the protection of journalists. An important potential outcome of the new legislation may be the introduction of a regulatory body for print media (e.g., a press council), as Croatia is one of only a few countries without one. The creation of a multistakeholder working group to produce the draft legislation is a welcome open government approach.

Milestone 8.2. has a clearer open government lens and aims to improve the regulations on the existing registry of beneficial ownership of the media, published by the Agency for Electronic Media.¹⁵ The action plan and Croatia’s Recovery and Resilience Plan explain that a new and unified digital system will ensure more transparent publication of data on media ownership structures and sources of media funding.¹⁶ Representatives of Gong, a CSO, have previously expressed that changes would not be sufficient to improve the register unless they address deficiencies in identifying the “real” owners, not just the formal ones.¹⁷

Milestone 8.3 seeks to implement a media fact-checking system. The Agency for Electronic Media has begun to conduct a public tender for a digital system to battle disinformation.¹⁸ On media literacy, a public consultation process¹⁹ on the objectives, activities, and criteria for a grant program to establish media fact-checking²⁰ has begun. The grant program is based on recommendations from an expert study on disinformation²¹ and states it will support a multitude of projects, mostly aimed at public education and campaigns for fighting disinformation. The Agency for Electronic Media would coordinate campaign efforts, using content produced from the grant-funded projects. Fact-checking efforts in Croatia have demonstrated the success of building networks to challenge disinformation (particularly during

the coronavirus pandemic) and have noted the need for greater media literacy in Croatia.²² Supporting media literacy and fact-checking systems has the potential to deliver substantial results and reduce the impact of disinformation in Croatian public discourse. This has become particularly pertinent in Croatia as right-wing free speech bloggers and portals criticize the work of Faktograf—Croatia’s primary fact-checking platform—when it reports factually inaccurate posts to Facebook.²³

Opportunities, challenges, and recommendations during implementation

The drafting of the Media Act was a milestone in Croatia’s previous action plan, but it was not started due to disputes over the need for a major overhaul versus making smaller-scale amendments to the law.²⁴ According to the government, the relevant ministry held several meetings with the Croatian Journalists’ Association (CJA) and legal experts, concluding that opinions on the need to draft a new act vary.²⁵ The CJA has to date not submitted any comments or proposals related to specific changes to this act.²⁶ The same issues were present during the drafting of the Electronic Media Act—the CJA withdrew from the working group, citing the Ministry’s failure to take into account any of their remarks and proposals, and its failure to pass the media strategy and the new Media Act before drafting the Electronic Media Act.²⁷ The Ministry later published a response stating that it had incorporated most of the CJA proposals into the Draft Proposal for the Electronic Media Act.²⁸ The new commitment mentions conducting an in-depth analysis, which may lead to amendments of two other acts: the Croatian Radio Television Act²⁹ and the Croatian News Agency Act.³⁰ This could postpone the implementation of the milestone, but the representative of the ministry was unavailable for comment on this topic.

The Agency for Electronic Media published a public tender for consulting services to develop a public data platform on media ownership and media funding sources in August 2022.³¹ According to civil society, the topic of media ownership transparency is prominent not due to a lack of a regulatory framework or registers but because the data available does not always include the actual owners of media outlets.³² It would, therefore, be critical for the milestone’s implementation to provide a way to resolve this issue of data accuracy and verification.

Citizens and CSOs have submitted 19 comments so far to the public consultation on the objectives, activities, and criteria for the grant program for fact-checking projects (Milestone 8.3).³³ One CSO comment highlighted the weakness of multiple unconnected projects being encouraged. Having a large number of unconnected or small-scale funded projects could fragment the impact of the project, limiting the number of participants and geographical spread, thus not achieving the intended objectives or producing a strong media fact-checking ecosystem.

The government can ensure ambitious implementation of this commitment by:

- **Ensure the effective functioning of the working group for drafting the Media Act.** At a minimum, this group should include media stakeholders as it did during the previous action plan cycle. Establishing the working group, as well as other consultative activities on the drafting of a new Media Act, should ensure the representation of all relevant stakeholders, including independent media experts, CSOs dealing with media freedoms and democratic values, the academic sector, and especially journalist and media professional associations. The comments received during the previous attempts to

develop this legislation should be considered in advance to avoid the draft act being abandoned again.

- As IRM previously recommended for the 2018–2020 action plan, the government should **ensure a new Media Act develops and reinforces the legal framework to protect the rights of journalists and independent media**. This includes establishing mechanisms to foster independent media, especially minority and nonprofit media; avoid concentration of media ownership; strengthen the autonomy of the publicly owned Croatian Radio Television; and introduce mechanisms and amend legislation allowing for an inordinate amount of SLAPP lawsuits. The Ministry has already started some of these actions and should continue to ensure these IRM recommendations continue to be implemented.
- **Although a framework for the Register of Beneficial Owners exists, the government needs to address concerns regarding the accuracy of information held on the “real” owners of media outlets** when amending legislation on media ownership and funding. This means going beyond publishing the submitted beneficial ownership information, to also ensure that it is verified and accurate. Information on media ownership and funding needs to be up-to-date and correspond to the actual situation, making it more difficult for owners and their media outlets to hide behind proxy ownership or sources of funding. These concerns could be addressed through collaboration with CSOs and other relevant stakeholders to ensure that the information published via the new system is verified and accurate. Denmark and the Slovak Republic currently have public registries that include steps to confirm the accuracy of the information submitted.³⁴
- **The Agency for Electronic Media’s campaign and awareness-raising projects it funds to improve media literacy would benefit from a unified and common visual identity and coordinated messaging and dissemination**. The overarching program of actions could consider learning from Canada’s “healthy democracy” commitment, focused on media freedom and democratic strengthening. The commitment championed international norms supporting diversity of content and quality and transparency of information. Its milestones also included supporting a healthy and reliable news ecosystem in the country in which media organizations were consulted to consider how the government can further support the transition to digital media and experts were consulted on how to increase diversity of content in the digital age.³⁵

Commitment 12. Improving Anti-Corruption Legislation (*Ministry of Justice and Public Administration*)

For a complete description of the commitment, see Commitment 12 in Croatia’s action plan: <https://www.opengovpartnership.org/documents/croatia-action-plan-2022-2024/>.

Context and objectives:

Since joining OGP in 2011, Croatia has always included anti-corruption commitments in its OGP action plans—from drafting the new anti-corruption strategy and analysis of lobbying issues to specific commitments and milestones linked to whistleblower protection and building CSO capacity for anti-corruption activities.

This commitment foresees the adoption of an action plan to combat corruption over the next three years, implementing the new Anti-Corruption Strategy 2021–2030.³⁶ It also seeks to

introduce new legislation to regulate lobbying—a previously unregulated area. Civil society representatives will participate in the mechanism for monitoring the implementation of the commitment, primarily through the work of the Council for the Prevention of Corruption.³⁷

The action related to lobbying follows on from a comprehensive comparative analysis,³⁸ produced as part of Croatia’s 2014–2016 action plan,³⁹ which informed the decision on whether to amend the existing legislative framework or draft a new law dedicated specifically to lobbying.⁴⁰ As The Council of Europe Group of States against Corruption (GRECO) reports, there is a real need to address the issue due to a clear lack of transparency surrounding the interests and people influencing policies and government decisions.⁴¹ The professional lobbying sector is relatively small in Croatia, but direct contacts between representatives of businesses and members of the government are commonplace. Prompted by this and other reports, as well as the results of the conducted analysis,⁴² stakeholder opinions,⁴³ and IRM recommendations,⁴⁴ the Ministry of Justice and Public Administration decided to regulate lobbying as a legal and legitimate practice according to the highest ethical standards, ensuring transparency and a positive impact on the quality of regulations and decisions adopted by the legislative and executive branches of government.⁴⁵

Potential for results: Substantial

The first milestone, a three-year action plan that operationalizes the new Anti-Corruption Strategy 2021–2030, was adopted immediately after Croatia’s OGP action plan was submitted.⁴⁶ This is the first such document envisaged in this strategic period up to 2030.⁴⁷ It is a comprehensive document, with almost 150 pages of measures and activities envisaged to implement the five specific goals set forth by the strategy: strengthening the institutional and normative anti-corruption framework, strengthening transparency and openness of public authorities, strengthening the system of integrity and conflict of interest management, strengthening anti-corruption policies in public procurement, and raising public awareness.⁴⁸ This is the first time an anti-corruption strategy with clearly defined indicators and milestones has been adopted within the strategic planning regulatory framework.⁴⁹ Considering the new strategic planning system with strict rules on monitoring, reporting, and evaluating progress, and the fact that there are two bodies that monitor implementation of the strategy and the action plan—one linked to the executive branch of government (Council for the Prevention of Corruption) and the other to the legislative branch (National Council for Monitoring the Implementation of the Anti-Corruption Strategy⁵⁰)—there is reasonable expectation that the envisaged activities will be carried out according to plan.

The second milestone of this commitment—drafting a lobbying act—has substantial potential for results. Regulating lobbying activities in Croatia has been a contentious issue for years, and CSOs have called for regulation of lobbying for many years.⁵¹ Without clearly established and defined standards of behavior between lobbyists and government officials to regulate them, professional lobbying is labeled a dubious activity with potential for corruption. The regulation of lobbying in Croatia would for the first time establish lobbying activities as a transparent, legal, and legitimate profession (with the possibility of monitoring and supervision) in accordance with the highest ethical standards.⁵² The Anti-Corruption Strategy also envisages the digitization of registration and deletion procedures; the possibility of public access to data from the future registry of lobbyists; and the potential to inform citizens about the drafted normative framework.

The law seeks to regulate the definitions of lobbying activities and who is considered a lobbyist, the principles of communication with a lobbyist, and details on the lobbyist register. This would mean that, for the first time, the public would be able to know who is lobbying, for what purpose, and to which public officials. Professional lobbyists would also be held to legal and ethical standards they are not currently beholden to.

The European Commission's report on the rule of law in Croatia in 2019,⁵³ 2020,⁵⁴ and 2021⁵⁵ stressed that lobbying is an area which needs to be regulated in line with the highest ethical standards, ensuring the achievement of standards of transparency in the work of lobbyists. The need to regulate lobbying activities was also highlighted by GRECO, as its recommendations in this area are still not implemented.⁵⁶ Much like the Anti-Corruption Strategy, the Government Program for 2020–2024⁵⁷ also envisages the adoption of comprehensive regulation. In addition, the National Recovery and Resilience Plan 2021–2026 planned for digitization of registration/deletion procedures, public access to data in the (future) register of lobbyists, and informing citizens about the (future) regulatory framework.⁵⁸ The Ministry of Justice and Public Administration established a working group in June 2021 for that purpose.⁵⁹ It has met three times so far, with the latest meeting taking place on 11 October 2022. The drafting process is expected to last until the end of 2022, according to a ministry representative.⁶⁰ The OGP action plan sets the deadline for completion of the drafting process for April 2023, and the anti-corruption action plan foresees the act will be adopted by the end of 2023.

Opportunities, challenges, and recommendations during implementation

IRM reiterates the recommendations set forth by GRECO, in that (i) rules be introduced on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence governmental legislative and other activities; and (ii) sufficient information about the purpose of these contacts be disclosed, such as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion.

As previously stated, an interdisciplinary working group has been established to draft the act. However, relevant anti-corruption CSOs, Transparency International and Gong, are not included despite the ministry listing them as potential members when collecting data for the latest European Commission country report on rule of law.⁶¹ Gong has since criticized the lack of relevant anti-corruption CSOs on this (and other) anti-corruption working groups as a way for the government to avoid politically problematic issues.⁶² Civil society stakeholders confirmed to IRM that this form of *openwashing*⁶³ has been used repeatedly in the past several years in various legislation-drafting procedures to fake a critical civil society, especially in issues surrounding anti-corruption.⁶⁴

Following recommendations from GRECO and obstacles identified during the research process for this Action Plan Review, IRM suggests that during implementation:

- The ministry **includes stakeholders with relevant experience** and expertise in transparency and open governance in the drafting process of the lobbying act before the public consultation period. This would ensure that experts on the topic are present in discussions, which can help improve the quality of the draft (e.g., by putting forward the case for the public interest) and draw from international experience. Ireland has used two OGP action plans (2014–2016⁶⁵ and 2021–2023⁶⁶) to set up a leading lobbying

regulation system. The most recent plan has sought to make amendments to the current system, based on several years of experience in implementation. An especially noteworthy addition is a cooling-off period for public officials.

- **Any regulation of lobbying activities considers explicitly including third parties seeking to influence government’s decision-making, beyond only professional lobbyists.** The professional lobbying sector is relatively small in Croatia, and direct contacts between representatives of businesses and members of the government are commonplace. The definition of lobbying therefore needs to include “in-house” lobbyists, those that work inside a particular organization, defending the interests of that organization. The definition should also include senior staff within organizations (e.g., a CEO of a corporation) for whom lobbying is not necessarily part of their job description but who can gain access to government officials or influence public decisions. To ensure its effective implementation, the working group could also consider including sanctions for noncompliance in the draft, in line with other existing legislation. These sanctions could have a sliding scale, including the threat of criminal sanctions, (temporary) de-registration, and disciplinary proceedings (in the case of public officials).
- Aside from regulating lobbying activities, the **ministry could also ensure transparency around the activities of persons in top executive and legislative functions through open agendas.** Public officials should be required to maintain and publish records of their meetings, the participants, and the topics discussed therein. For example, ministries in the UK publish data on meetings, hospitality, gifts, and overseas travel for senior officials and ministers. Italy’s Anti-Corruption Authority, European Union commissioners, and members of their cabinet publish such meetings and details of topics covered on a weekly and rolling basis.⁶⁷

Other commitments

Other commitments IRM did not identify as promising commitments are discussed below. This part of the review provides recommendations to contribute to the learning and implementation of the commitments below.

IRM assesses that all 16 commitments are verifiable and have an open government lens. The two promising commitments assessed above are the only commitments IRM assesses to have substantial potential for results. Commitment 4 on parliamentary openness and transparency has unclear potential for results, as it largely continues ongoing practices of compliance with existing rules and policies, while the rest of the commitments have modest potential for results. Future action plans may benefit from fewer but more ambitious commitments. Multiple commitments focus on education, training, or awareness-raising activities that limit the potential for more ambitious results from implementation. New policy areas could be explored for the action plan where, otherwise, commitments from previous plans only make incremental changes or where there is no added value in the action plan.

The first 10 commitments come under the theme of transparency, of which almost half the milestones focus on implementing some form of education or training. All but Commitments 2, 9, and 10 build upon commitments from the previous action plan. Commitment 1 on improving implementation of the Law on the Right to Access Information could be more effective if

activities directly addressed the problem of “administrative silence” in answering requests for access to information.⁶⁸

Commitment 2 is a new commitment that would train relevant public servants and officials on personal data protection.⁶⁹ The commitment could go beyond the obligations stemming from GDPR legislation⁷⁰ by educating officials on limiting the overuse of GDPR to not provide public information where it is not warranted, as is now often the case.⁷¹

Implementation of Commitment 3 on fiscal transparency could be improved by explicitly outlining or seeking to develop the list of content to be published, minimum datasets, and the publication method on public spending data for local and regional self-governments.⁷² Article 144 of the Budget Act⁷³ obliges local and regional units to publish information on spending on their websites in an easily accessible, searchable and machine-readable manner. It is a significant change in legislation, but given monetary and personnel constraints, especially in local units, it remains to be seen what implementation will look like.^{74 75}

Two milestones for Commitment 5 are aimed at education and training activities in the form of webinars. While establishing a registry of referenda initiatives is a valuable step forward, it would only have limited broader impact due to the relatively small number of referendum initiatives.

It is not clear that an IT system to monitor and evaluate the allocation of public funds for CSO programs and projects (Commitment 6) will be implemented because the distribution of public funds set aside is still in the planning phase,⁷⁶ which was the same reason for it not being implemented during the previous action plan cycle.⁷⁷ Linked to this commitment, Commitment 7’s modest milestone would conduct an education program for public companies on the standards of fund allocation for CSOs.⁷⁸

Commitment 9 has modest potential for results, as the improvements being implemented⁷⁹ would ensure better management of official documentation in the preexisting Central Catalogue of Official Documentations (including enabling all PDF documents to be machine readable⁸⁰), a more user-friendly system, and the development of a search engine for official documents.⁸¹

Commitment 10’s planned improvement of the Central Register of State Assets⁸² is a new topic with modest potential for results. It aims to change existing practices and increase the quality of information available on state assets to the public. While this is an important area regarding efforts to fight corruption, especially in light of various affairs in managing publicly owned assets in Croatia,⁸³ the commitment is limited to technical improvements of the existing portal, such as adding new functionalities and new reporting systems,⁸⁴ which will make it easier for public authorities to submit relevant data on their assets.⁸⁵

Commitment 11 on whistleblower protection aims to build upon the progress made during the last action cycle⁸⁶ and to advance the existing legislative framework by harmonizing its provisions with those from EU’s whistleblower protection directive.⁸⁷ Considering that there is already a law protecting whistleblowers in place, the commitment would lead to a modest change in current practices through alignment with EU legislation and an increased level of knowledge for key officials and representatives.

Commitment 13 continues several commitments in previous action plan cycles.⁸⁸ A civil society stakeholder, however, confirmed that the issues (such as difficulties with navigating the page and a lack of important datasets that are not regularly maintained and updated) affecting the Open Data Portal at the end of the last action plan cycle⁸⁹ remain,⁹⁰ which therefore limit the potential for results. Given that there is an EU project currently being implemented to improve the portal (redesigned in 2021) and an increase in the number of publishers and datasets,⁹¹ it would be beneficial if the existing datasets were edited to include updated, open, machine-readable data. New datasets should exclude non-open-format types of data (e.g., PDFs).

Commitment 14, while being largely a continuation of the same commitment from Croatia's previous action plan,⁹² would have modest potential for results. The proposed amendments to the Code on Public Consultation⁹³ may help facilitate public authorities' usage of, and citizen engagement with, the portal compared to current practices.⁹⁴

Commitment 15 could provide an impetus for change in the level of transparency and inclusion in Croatian cities and municipalities. However, there are several responsible authorities and cooperative bodies, and aside from regular work performed by the Government Office for Cooperation with NGOs and the Central State Office for Development of Digital Society, there is no formal way to ensure actual participation of local and regional authorities in this initiative, other than on a voluntary basis. Also, the local/regional level is very fragmented, with 576 local self-government units with overarching developmental differences.⁹⁵ Without clear responsibility for implementing the commitment, the end of the action plan cycle is likely to repeat the limited implementation and success of the previous action plan commitment.⁹⁶

Commitment 16 on OGP sustainability is less ambitious than in the previous action plans, as it seeks to introduce a pilot-project in secondary schools on open cohesion, whereas previous commitments aimed to reform the curriculum to include civic education and OGP values.⁹⁷ Not detracting from the value of the project itself nor the fact that it is the first in which a new public authority is the responsible body—the Ministry of Regional Development and EU Funds, whose more pronounced involvement in the MSF would be beneficial—its potential for results is modest. The number of participants in the activities planned would not surpass 200, with the exception of teacher training activities. The commitment may have a wider reach if more participants were included, perhaps by using tools for remote participation if project constraints don't allow for physical participation.

⁷ "Croatia" World Press Freedom Index (Reporters Without Borders: 2022), <https://rsf.org/en/croatia>

⁸ "Croatia" World Press Freedom Index (Reporters Without Borders: 2022), <https://rsf.org/en/croatia>. In the report, Croatia increased its ranking from 56 to 48 out of 180 countries included in the index. The legislative indicator achieved the highest score of the five indicators evaluated (political, economic, social, and security are the other indicators).

⁹ "Croatia" World Press Freedom Index (Reporters Without Borders: 2022), <https://rsf.org/en/croatia>; 2021 Rule of Law Report Croatia (European Commission, 2 November 2022), https://ec.europa.eu/info/sites/default/files/2021_rolr_country_chapter_croatia_en.pdf; *Freedom House Report 2021* (Freedom House, 2 November 2022), <https://freedomhouse.org/country/croatia/freedom-world/2021>; Marijana Grbeša, Marija Volarević: "Media in Croatia: From freedom fighters to tabloid avengers" (*Medienpolitik International*, 10 September 2021), <https://link.springer.com/article/10.1007/s11616-021-00683-y>; Lina Rusch: "Media Freedom in Croatia" (Konrad Adenauer Stiftung, 2 November 2022), <https://www.kas.de/en/web/balkanmedia/media-freedom3>; Scott Griffen, *Croatia: Media Freedom in Turbulent Times* (Joint International Mission, August 2016), <https://ipi.media/wp-content/uploads/2016/12/Croatia-Report-Intl-Mission-2016.pdf>. The Croatian Journalists' Association regularly publishes articles and analyses on the state of the media in Croatia, available at:

<https://www.hnd.hr/eng/home>; Giovanni Vale, "Media freedom in Croatia: The problem is not the laws, but their application" (BalkanInsight.com, 2 May 2022), <https://www.balkanicaucaso.org/eng/Areas/Croatia/Media-freedom-in-Croatia-the-problem-is-not-the-laws-but-their-application-217769>

¹⁰ See Commitment 8. Media Regulatory Framework in the *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia up to 2020* (OGP, December 2018), https://www.opengovpartnership.org/wp-content/uploads/2019/02/Croatia_Action-Plan_2018-2020_EN.pdf, and in *IRM: Croatia Transitional Results Report 2018–2020*: https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf

¹¹ Government of the Republic of Croatia, *Action Plan for Implementation of the Initiative Open Government Partnership in the Republic of Croatia for the Period 2014 to 2016* (OGP, July 2014) 24–25 (Measure 8), <https://www.opengovpartnership.org/sites/default/files/Action%20Plan-OGP-8-7-2014-final-ENG.pdf>.

¹² C1.1.1. R6-I2 Establishment of media fact-checking and public disclosure system, Recovery and Resilience Facility Operational arrangements between the European Commission and Croatia, February 2022,

https://ec.europa.eu/info/sites/default/files/countersigned-croatia-rrf-oa_0.pdf

¹³ "Regulations > Media" (Ministry of Culture and Media of the Republic of Croatia, 2022), <https://min-kulture.gov.hr/propisi-543/mediji-16238/16238>.

¹⁴ Media Act and its amendments (*Official Gazette*, 3 October 2022), <https://narodne-novine.nn.hr/search.aspx?upit=Zakon+o+medijima&naslovi=da&sortiraj=1&kategorija=1&rpp=10&qtype=3&pretrag=da>

¹⁵ These registers are also published in a reusable and easily searchable format (Excel spreadsheet) on the website of the Agency for Electronic Media (September 2022, <https://www.aem.hr/>).

¹⁶ Croatia's Recovery and Resilience Plan states that a single digital system for the publication of data on media ownership would include the publication of media financing, which would require publication of data on media income from activities, income from received state grants, income from local units and regional self-governments, revenues from advertising of state administration bodies and public institutions founded by the Republic of Croatia, as well as legal entities owned or predominantly state-owned on the websites of regulators and media service providers. Government of the Republic of Croatia, National Recovery and Resilience Plan 2021–2026 [Nationalni Plan Oporavka I Otpornosti 2021- 2026], July 2021, <https://vlada.gov.hr/UserDocsImages/Vijesti/2021/srpanj/29%20srpnja/Plan%20oporavka%20i%20otpornosti%20%20srpanj%202021..pdf>

¹⁷ Melisa Skender (Gong), online interview, 11 November 2020.

¹⁸ "Javna nabava" (Agency for Electronic Media, 5 October 2022), <https://www.aem.hr/kategorija/javna-nabava/year/2022/>

¹⁹ The document "Introductory announcement in the preparation of the Grant Program and the Public Call for the allocation of grants. The initial framework: objectives, activities and criteria" was open for public consultation from May 26 to June 17, 2022. The document received 19 comments from citizens and CSOs. (e-Savjetovanja, 4 October 2022), <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=20788>

²⁰ "Javno savjetovanje za pripremu NPOO programa 'Uspostava provjere činjenica'" (Agency for Electronic Media, 29 September 2022), <https://www.aem.hr/en/nekategorizirano/javno-savjetovanje-za-pripremu-npoo-programa-uspostava-provjere-cinjenica/>

²¹ "Strengthening society's resistance to misinformation: Analysis of the situation and guidelines for action" (Agency for Electronic Media, 29 September 2022), https://www.aem.hr/wp-content/uploads/2022/09/Studija_dezinformacije_2-izdanje.pdf

²² Tara Kelly, *How Faktograf worked across borders to stem COVID-19 misinformation in southeastern Europe* (Paynter, 15 December 2022) <https://www.poynter.org/business-work/2020/how-faktograf-worked-across-borders-to-stem-covid-19-misinformation-in-southeastern-europe/>

²³ Darko Markusic, *Croatian Fact-Checkers' War on Fake News Draws Bias Charge* (BalkanInsight.com, 24 March 2022) <https://balkaninsight.com/2022/03/24/croatian-fact-checkers-war-on-fake-news-draws-bias-charge/>

²⁴ According to Nives Zvonarić, Ministry of Culture and Media in "Zapisnik sa 6. sjednice Savjeta inicijative Partnerstvo za otvorenu vlast" [Minutes from the sixth session of the Open Government Partnership Initiative Council] (22 December 2020), <https://udruga.gov.hr/UserDocsImages/dokumenti/Zapisnik%20-%206.%20sjednica%203.%20saziva%20Savjeta%20inicijative%20POV%20-%203.%20mandat.pdf>

²⁵ Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018–2020*.

²⁶ Ibid., p. 62.

²⁷ "HND: Istupili smo iz Radne skupine za izradu ZEM-a jer Ministarstvo culture nije uvažilo nijedan naš prijedlog" (Croatian Journalists' Association, 19 January 2020), <https://www.hnd.hr/hnd-istupili-smo-iz-radne-skupine-za-izradu-zem-a-je-ministarstvo-kulture-nije-uvazilo-nijedan-nas-prijedlog1>.

²⁸ Reaction of the Ministry of Culture to the withdrawal of the Croatian Journalists' Association from the Ministry's working group for the drafting of the new law on electronic media (Ministry of Culture and Media, 29 September

2022), <https://min-kulture.gov.hr/vijesti-8/reagiranje-ministarstva-kulture-na-istupanje-hrvatskog-novinarskog-drustva-iz-radne-skupine-ministarstva-za-izradu-novog-zakona-o-elektronickim-medijima/18690>.

²⁹ Croatian Radio Television Act and its amendments (Official Gazette, 3 October 2022), <https://narodne-novine.nn.hr/search.aspx?upit=Zakon+o+hrvatskoj+radio+televiziji&naslovi=da&sortiraj=1&kategorija=1&rpp=10&qtype=3&pretraga=da>

³⁰ Croatian News Agency Act (Official Gazette 96/2001-1612, 3 October 2022), https://narodne-novine.nn.hr/clanci/sluzbeni/2001_11_96_1612.html

³¹ "Jednostavna nabava" (Agency for Electronic Media, 5 October 2022), <https://www.aem.hr/kategorija/jednostavna-nabava/>

³² Melisa Skender (Gong), online interview, 11 November 2020. For more information, see Andreja Žapčić, "Tko su stvarni vlasnici 'vlasnika' najžilavijih medija?" ["Who are the real owners of the 'owners' of the toughest media?"] (Gong, 13 February 2014), <https://www.gong.hr/hr/dobra-vladavina/mediji/tko-je-stvarni-vlasnik-vlasnika-najzilavijeg-medij/>.

³³ The document "Introductory announcement in the preparation of the Grant Program and the Public Call for the allocation of grants. The initial framework: objectives, activities and criteria" was open for public consultation from 26 May to 17 June 2022 (e-Savjetovanja, 4 October 2022), <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=20788>

³⁴ "How Denmark is verifying beneficial ownership information" (Tax Justice Network, 8 October 2020) <https://taxjustice.net/2020/10/08/how-denmark-is-verifying-beneficial-ownership-information/>; Tymon Kiepe, Victor Ponsford, Louise Russell-Prywata, "Early impacts of public registers of beneficial ownership: Slovakia" (OpenOwnership, 1 October 2020) <https://www.openownership.org/en/publications/early-impacts-of-public-registers-of-beneficial-ownership-slovakia/>

³⁵ "Canada's 2018-2020 National Action Plan for Open Government" (Open Government Partnership, January 2019) https://www.opengovpartnership.org/wp-content/uploads/2019/01/Canada_Action-Plan_2018-2020_EN.pdf

³⁶ "Strategija sprječavanja korupcije za razdoblje od 2021. do 2030. Godine" (Official Gazette, 120/2021) https://narodne-novine.nn.hr/clanci/sluzbeni/2021_11_120_2069.html

³⁷ The Council for the Prevention of Corruption is a working body of the Government of the Republic of Croatia established with the aim of drafting, improving, and systematically monitoring the implementation and assessment of the effects of measures and activities from national strategic and implementation documents related to the prevention of corruption, which also determine the tasks and composition of the council and other issues within its scope. (Ministry of Judiciary and Administration, July 2022), <https://mpu.gov.hr/istaknute-teme/borba-protiv-korupcije/savjet-za-sprjecavanje-korupcije/21530>

The council was established by a Government Decision (Official Gazette, 31/2017), https://narodne-novine.nn.hr/clanci/sluzbeni/2017_04_31_697.html.

³⁸ "Analiza za uređenje zakonskog okvira lobiranja" (December 2016), https://mpu.gov.hr/UserDocsImages/dokumenti/Antikorupcija/dokumenti/Analiza%20za%20ure%C4%91enje%20zakonskog%20okvira%20lobiranja%20web%20final_clean.docx

³⁹ Government of the Republic of Croatia, *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia for the Period 2014 to 2016* (OGP, July 2014) (Commitment 13), <https://www.opengovpartnership.org/sites/default/files/Action%20Plan-OGP-8-7-2014-final-ENG.pdf>;

⁴⁰ *Croatia 2014–2016 End-of-term Report* (OGP, March 2017), https://www.opengovpartnership.org/wp-content/uploads/2019/07/Croatia_EOTR_2014-2016_for-pub-comment_ENG.pdf

⁴¹ *Fifth Evaluation Round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies* (GRECO, 24 March 2020), <https://rm.coe.int/fifth-round-evaluation-report-on-croatia-preventing-corruption-and-pro/16809cff22>; *Compliance Report* (GRECO, 22 December 2021): <https://rm.coe.int/fifth-evaluation-round-compliance-report-on-croatia-adopted-by-greco-a/1680a4f0f6>.

⁴² Ivan Odeljan (Ministry of Judiciary and Administration), online interview by IRM researcher, 12 October 2022.

⁴³ The lobbying community, relevant experts, CSOs, and other stakeholders in Croatia have been very vocal on the need for regulating lobbying activities, as stated in previous IRM reports. Also, a public debate was held on the need and models of lobbying regulation within the scope of the anti-corruption action plan for 2017 and 2018 during the period of the previous anti-corruption strategy implementation.

⁴⁴ *General Recommendations, IRM Croatia Design Report 2018–2020* (OGP, December 2019), https://www.opengovpartnership.org/wp-content/uploads/2019/12/Croatia_Design_Report_2018-2020_EN.pdf.

⁴⁵ *Action Plan for the Implementation of the Open Government Partnership Initiative in the Republic of Croatia for the Period 2022–2023* (Commitment 12) (OGP, July 2022), <https://www.opengovpartnership.org/documents/croatia-action-plan-2022-2024/>.

⁴⁶ *Akcijski plan za razdoblje od 2022. do 2024. godine uz Strategiju sprječavanja korupcije za razdoblje od 2021. do 2030. godine* (Ministry of Judiciary and Administration, July 2022),

<https://mpu.gov.hr/UserDocsImages/dokumenti/Antikorupcija/dokumenti/Akcijski%20planovi%20-%20Strategija%202022-2030/Akcijski%20plan%20-%202022-2024.pdf>

⁴⁷ The implementation of the Anti-Corruption Strategy from 2021–2030 is planned in accordance with three-year action plans: from 2022 to 2024, from 2025 to 2027, and finally from 2028 to 2030.

⁴⁸ "Strategija sprječavanja korupcije za razdoblje od 2021. do 2030. Godine" (*Official Gazette*, 120/2021)

https://narodne-novine.nn.hr/clanci/sluzbeni/2021_11_120_2069.html

⁴⁹ In line with the Law on the Strategic Planning and Development Management System (*Official Gazette* 123/2017),

https://narodne-novine.nn.hr/clanci/sluzbeni/2017_12_123_2798.html and its bylaws.

⁵⁰ The parliamentary body was established in 2006 (Croatian Parliament, 5 October 2022),

<https://www.sabor.hr/hr/radna-tijela/nacionalno-vijece-za-pracenje-provedbe-strategije-suzbijanja-korupcije-10-saziv>.

It supervises and monitors the implementation of the Anti-Corruption Strategy; systematically monitors the data on the occurrences of corruption that are submitted at request of the bodies in charge of implementing the strategy; analyzes the reports of competent authorities on the implementation of the strategy and action plans; evaluates the methods and results of implementation; proposes measures for greater efficiency in the implementation of the strategy; encourages and directs the cooperation of the Croatian Parliament and state and other bodies, as well as other factors responsible for the implementation of the strategy; and submits a report on its work to the Croatian Parliament twice a year.

⁵¹ *Croatia 2014–2016 End-of-term Report* (OGP, March 2017), https://www.opengovpartnership.org/wp-content/uploads/2019/07/Croatia_EOTR_2014-2016_for-pub-comment_ENG.pdf

⁵² Measure 4.3.9 Legal regulation of the lobbying system in the action plan for 2022 to 2024 (Ministry of Judiciary and Administration, July 2022),

<https://mpu.gov.hr/UserDocsImages/dokumenti/Antikorupcija/dokumenti/Akcijski%20planovi%20-%20Strategija%202022-2030/Akcijski%20plan%20-%202022-2024.pdf>

⁵³ 2019 Report of the Rule of Law in the Republic of Croatia for the preparation of the Annual Report on the Rule of Law in the European Union Member States by the European Commission (European Commission, 2020)

https://ec.europa.eu/info/sites/default/files/2020_rule_of_law_report_-_input_from_member_states_-_croatia.pdf

⁵⁴ 2020 Report of the Rule of Law in the Republic of Croatia for the preparation of the Annual Report on the Rule of Law in the European Union Member States by the European Commission (European Commission, 2021) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021SC0713&from=EN>

⁵⁵ 2021 Report of the Rule of Law in the Republic of Croatia for the preparation of the Annual Report on the Rule of Law in the European Union Member States by the European Commission (European Commission, 2022)

https://ec.europa.eu/info/sites/default/files/hr_contribution_en_version.pdf

⁵⁶ Fifth Evaluation Round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies (GRECO, 24 March 2020), <https://rm.coe.int/fifth-round-evaluation-report-on-croatia-preventing-corruption-and-pro/16809cff22>; Compliance Report (GRECO, 22 December 2021):

<https://rm.coe.int/fifth-evaluation-round-compliance-report-on-croatia-adopted-by-greco-a/1680a4f0f6>.

⁵⁷ "Program Vlade Republike Hrvatske 2020.-2024." (Government of the Republic of Croatia, 2020),

<https://vlada.gov.hr/UserDocsImages/ZPPI/Dokumenti%20Vlada/Program%20Vlade%20Republike%20Hrvatske%20za%20mandat%202020.%20-%202024..pdf>.

⁵⁸ National Recovery and Resilience Plan of the Republic of Croatia from 2021 to 2026 (European Commission, 6 October 2022), https://ec.europa.eu/info/files/recovery-and-resilience-plan-croatia_en.

⁵⁹ "Odluka o osnivanju Radne skupine za izradu Nacrta prijedloga Zakona o lobiranju" (Ministry of Judiciary and Administration, 25 June 2021),

<https://mpu.gov.hr/UserDocsImages/dokumenti/Pravo%20na%20pristup%20informacijama/Radne%20skupine/Odluka%20o%20osnivanju%20radne%20skupine%20za%20izradu%20Nacrta%20prijedloga%20Zakona%20o%20lobiranju.pdf>. The working group is composed of representatives of the government, State Attorney's Office, Information Commissioner, Commission for Resolution of Conflicts of Interest, Agency for Personal Data Protection, Croatian Lobbyists' Association, trade unions and employers' associations, other CSOs, and experts from the academic sector.

⁶⁰ Ivan Odeljan (Ministry of Judiciary and Administration), online interview by IRM researcher, 12 October 2022.

⁶¹ See footnote 102 in the 2021 Report of the Rule of Law in the Republic of Croatia for the preparation of the Annual Report on the Rule of Law in the European Union Member States by the European Commission (European Commission, 2022) https://ec.europa.eu/info/sites/default/files/hr_contribution_en_version.pdf

⁶² "Žeton udruge oblikuju zakone protiv korupcije" (Gong, 9 September 2022), <https://gong.hr/2022/09/09/zeton-udruge-oblikuju-zakone-protiv-korupcije/>. The only CSO on the working group is the Center for Social Innovation, whose main goal is the development, encouragement, and promotion of social innovations and social entrepreneurship; networking and providing support to social innovators and entrepreneurs; and promotion of values and culture of social/social innovations in society (Center for Social Innovation, 6 October 2022), <https://cdi.hr/onama/>.

⁶³ A harmful practice that can be defined as a superficial commitment to opening data, practices, and institutions without actually meeting the criteria for openness.

⁶⁴ Melisa Skender (Gong), online interview by IRM researcher 19. September 2022; Miroslav Schlossberg (HrOpen), phone interview by IRM researcher, 5 October 2022. For details, see the article “Zeton udruge oblikuju zakone protiv korupcije” (Gong, 9 September 2022), <https://gong.hr/2022/09/09/zeton-udruge-oblikuju-zakone-protiv-korupcije/>.

⁶⁵ Regulation of Lobbying (Ireland Action Plan 2014–2016), <https://www.opengovpartnership.org/members/ireland/commitments/IE0014/>.

⁶⁶ Review and Amendment of Lobbying Law (Ireland Action Plan 2021–2023), <https://www.opengovpartnership.org/members/ireland/commitments/IE0051/>.

⁶⁷ An example of transparent publication of meetings for EU Commissioner Frans Timmermans:

https://ec.europa.eu/commission/commissioners/2019-2024/timmermans_en#transparency; an example from the UK Cabinet office of the list of information that is available in relation to meetings, hospitality, gifts, and overseas travel:

<https://www.gov.uk/government/collections/ministers-transparency-publications>; Italy’s Anti-Corruption Authority also publishes any meetings with external stakeholders on its website each week:

<https://www.anticorruzione.it/amministrazione-trasparente/altri-contenuti-dati-ulteriori>.

⁶⁸ According to Miroslav Schlossberg (HrOpen), around 40-50 percent of all request for access to information submitted to public authorities remain unanswered. Phone interview by IRM researcher, 5 Sep. 2022.

⁶⁹ General Data Protection Regulation is the toughest privacy and security law in the world, drafted and passed by the European Union, imposing obligations onto organizations anywhere as long as they target or collect data related to people in the EU. The regulation was put into effect on 25 May 2018. (GDPR, 16 September 2022)

<https://gdpr.eu/>

⁷⁰ Act on the Implementation of the General Data Protection Regulation (*Official Gazette*, 42/2018), https://narodne-novine.nn.hr/clanci/sluzbeni/2018_05_42_805.html

⁷¹ Melisa Skender (Gong), online interview by IRM researcher, 19 September 2022; Miroslav Schlossberg (HrOpen), phone interview by IRM researcher, 5 October 2022.

⁷² The instruction was to be adopted by 30 June 2022, according to Croatia’s action plan.

⁷³ Budget Act (*Official Gazette*, 144/2021), https://narodne-novine.nn.hr/clanci/sluzbeni/full/2021_12_144_2457.html

⁷⁴ Darija Marić (Government Office for Cooperation with NGOs), online interview by IRM researcher, 15 September 2022; Melisa Skender (Gong), online interview by IRM researcher, 19 September 2022.

⁷⁵ Iterations of this commitment have been included in each action plan Croatia produced in the past, and at least one of the milestones in these commitments has been a push forward in existing financial reporting and transparency practice.

⁷⁶ Darija Marić (Government Office for Cooperation with NGOs), online interview by IRM researcher, 15 September 2022.

⁷⁷ See Commitment 5. Transparency in Public Funding of CSO Projects in the *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia up to 2020* (OGP, December 2018),

https://www.opengovpartnership.org/wp-content/uploads/2019/02/Croatia_Action-Plan_2018-2020_EN.pdf, and in the *IRM Croatia Transitional Results Report 2018–2020*: https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf.

⁷⁸ It is interesting to note that the title of the commitment only mentions commercial companies majorly owned by local and regional self-government units, but the milestone also includes companies majorly owned by authorities at the national level.

⁷⁹ According to Tamara Horvat Klemen and Tanja Didak Prekpalaj (Central State Office for Development of Digital Society), the implementation of Commitment 10 is related to the implementation of the EU project Establishment of an Integral System for the Management of Official Documentation of the Republic of Croatia, ending in January 2023 (<https://rdd.gov.hr/projekti-i-eu-projekti/eu-projekti/uspostava-integralnog-sustava-za-upravljanje-sluzbenom-dokumentacijom-republike-hrvatske/330>). So far, about 500 of the required 798 civil servants were trained on their legal obligations, including the Central Catalog. The creation of a new system for managing Croatian official documents of the Republic of Croatia with an improved semantic search engine is nearing completion. So far, four out of eight educational video materials have been produced. All activities will be completed by the beginning of 2023. Online interview by IRM researcher, 5 October 2022.

⁸⁰ According to Tamara Horvat Klemen and Tanja Didak Prekpalaj (Central State Office for Development of Digital Society), online interview by IRM researcher, 5 October 2022.

⁸¹ Central Catalog of Official Documentation allows users to search and obtain texts of Croatia’s legal regulations, international contracts and agreements, the official gazettes of local and regional self-government units, other documents and publications, and the EUROVOC thesaurus (Central State Office for Development of Digital Society, 3 October 2022), <https://sredisnjikatalogrh.gov.hr/>

⁸² Central Register of State Assets allows users to search and obtain information on various forms of assets by public authorities—local, regional, state, other public bodies, institutions, and companies (Central State Office for Development of Digital Society, 3 October 2022), <https://rdd.gov.hr/sredisnji-registar-drzavne-imovine/349>

⁸³ Gong cooperated with a well-known whistleblower from the former Ministry of State Assets, Maja Đerek, to draft an analysis, “(Non)management of state real estate—non-transparency, potential and recommendations,” which would be presented on 19 October 2022. (Gong, 11 October 2022), <https://gong.hr/2022/10/11/drzavne-nekretnine-smiju-biti-plijen-za-vladajuće-i-njihove-prijatelje/>

⁸⁴ According to Tamara Horvat Klemen and Tanja Didak Prekpalaj (Central State Office for Development of Digital Society), the implementation of Commitment 10 is related to the implementation of the EU project “Improving the system of records and management of state assets,” ending in June 2023 (<https://rdd.gov.hr/projekti-i-eu-projekti/eu-projekti/unaprjedenje-sustava-evidencije-i-upravljanja-drzavne-imovine/1460>). Online interview by IRM researcher, 5 October 2022.

⁸⁵ The register was established and is managed in accordance with the provisions of the Law on the Central Register of State Assets Act (*Official Gazette*, 112/18); the Central State Office for Development of Digital Society took over its administrative management in 2019.

⁸⁶ See Commitment 6. Protection of Persons Reporting Corruption in the *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia up to 2020* (OGP, December 2018), https://www.opengovpartnership.org/wp-content/uploads/2019/02/Croatia_Action-Plan_2018-2020_EN.pdf, and in the *IRM Croatia Transitional Results Report 2018–2020*: https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf.

⁸⁷ “Directive (EU) 2019/1937 of the European Parliament and the Council on the protection of persons reporting on breaches of Union law,” European Union official website (28 September 2022), <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32019L1937>.

⁸⁸ Government of the Republic of Croatia, *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia for the Period 2014 to 2016* (OGP, July 2014) 14–15 (Commitment 3.2., 3.3.), <https://www.opengovpartnership.org/sites/default/files/Action%20Plan-OGP-8-7-2014-final-ENG.pdf>; *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia up to 2020* (OGP, December 2018) 54–58, https://www.opengovpartnership.org/wp-content/uploads/2019/02/Croatia_Action-Plan_2018-2020_EN.pdf.

⁸⁹ Croatia Transitional Results Report 2018–2020: https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf.

⁹⁰ Miroslav Schlossberg (HrOpen), phone interview by IRM researcher, 5 September 2022.

⁹¹ According to Tamara Horvat Klemen and Tanja Didak Prekpalaj (Central State Office for Development of Digital Society), the portal was redesigned in May 2021, with a new production environment. To speed up the publication of new datasets, user instructions for administrators were created, resulting in an increased number of publishers on the portal: 460 as opposed to 124 at the end of 2021. The number of datasets increased from 1,125 to the current 1,538. Online interview by IRM researcher, 5 October 2022.

⁹² See Commitment 12. Public Consultations in the *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia up to 2020* (OGP, December 2018), https://www.opengovpartnership.org/wp-content/uploads/2019/02/Croatia_Action-Plan_2018-2020_EN.pdf, and in the *IRM Croatia Transitional Results Report 2018–2020*: https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf

⁹³ The original code was adopted in 2009: <https://udruga.gov.hr/pristup-informacijama/savjetovanje-sa-zainteresiranom-javnoscu/provedba-kodeksa-savjetovanja/276>.

⁹⁴ This would entail activities to promote and increase citizen and CSO participation, as well as activities to improve the technology, processes, and functions of the e-consultation portal. According to Tamara Horvat Klemen and Tanja Didak Prekpalaj (Central State Office for Development of Digital Society), since the portal has not been updated since 2015, the new system will be adapted to different types of devices, making it more accessible, and business analytics, statistics, and customer support will be improved. Another improvement will be adopting the new Code of Practice regarding public consultation, as the existing one was introduced in 2009 (https://narodne-novine.nn.hr/clanci/sluzbeni/2009_11_140_3402.html). Since the portal has not been updated since 2015, the new system will be adapted to different types of devices, making it more accessible, and business analytics, statistics, and customer support will be improved. Online interview by IRM researcher, 5 October 2022.

⁹⁵ For information on the local and regional self-government system in Croatia, visit the Institute of Public Administration (www.iju.hr). For information on funding for local and regional self-government, visit the Institute of Public Finance (www.ijf.hr). These institutes provide data, analyses, documents, articles, and recommendations for improvement (e.g., a collection of papers on the local and regional self-government system is available at <http://iju.hr/publikacije.asp?ID=1>).

⁹⁶ See Commitment 14. OGP at Local and Regional Levels in the *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia up to 2020* (OGP, December 2018), https://www.opengovpartnership.org/wp-content/uploads/2019/02/Croatia_Action-Plan_2018-2020_EN.pdf, and in *IRM: Croatia Transitional Results Report 2018–2020*, https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf.

⁹⁷ The pilot project is aimed at promoting the participation of students in monitoring investments within the framework of the European Union’s cohesion policy using public open data. Through its activities, the project promotes and contributes to citizen monitoring of public finances by using publicly available data and information and communication technologies, as well as raising the culture of active citizenship.

Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The IRM follows a filtering and clustering process to identify promising reforms or commitments:

Step 1: Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

Step 2: Determine if the commitment has an open government lens. Is it relevant to OGP values?

Step 3: Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

Step 4: Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM in collaboration with Ivona Mendeš Levak and was externally expert reviewed by German Emanuele. The IRM methodology, quality of IRM

products, and review process are overseen by IRM's IEP. For more information, see the IRM Overview section of the OGP website.⁹⁸

⁹⁸ IRM Overview: <https://www.opengovpartnership.org/irm-guidance-overview/>

Annex 1. Commitment-by-Commitment Data⁹⁹

<p>Commitment 1. Implementing Right to Information</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 2. Implementing Legislation on Personal Data Protection</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 3. Fiscal Transparency</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 4. Parliamentary Openness and Transparency</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 5. Referenda Transparency</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 6. Transparency in Public Funding of CSO Programs/Projects</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 7. Transparency and Accountability of Commercial Companies in Majority Ownership by Local and Regional Self-Government</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 8. Media Regulatory Framework</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial
<p>Commitment 9. Improving the Central Catalog of Official Documentation</p> <ul style="list-style-type: none"> • Verifiable: Yes

<ul style="list-style-type: none"> • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 10. Improving the Central Registry of State Assets</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 11. Protection of Persons Reporting Corruption</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 12. Improving Anti-Corruption Legislation</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial
<p>Commitment 13. Ongoing Data Opening</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 14. Improving Public Consultations</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 15. OGP at Local and Regional Levels</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 16. OGP Sustainability</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest

⁹⁹ **Editorial notes:**

1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see Croatia's action plan:
<https://udruga.gov.hr/UserDocsImages//dokumenti//Akcijski%20plan%20za%20provedbu%20inicijative%20Partnerstvo%20za%20otvorenu%20vlast%20u%20Republici%20Hrvatskoj%202022.-2023.pdf>

Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the updated OGP Participation and Co-Creation Standards that came into force on 1 January 2022.¹⁰⁰ IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. During this time, IRM will assess countries' alignment with the standards and compliance with their minimum requirements.¹⁰¹ However, countries will only be found to be acting contrary to the OGP process if they do not meet the minimum requirements, starting with action plans submitted to begin in 2024 and onward. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation ?
1.1 Space for dialogue: The Croatian Council for the Open Government Partnership Initiative of the Government of the Republic of Croatia is set up as an MSF to encourage transparency and openness in the work of public authorities and to ensure intersectoral cooperation in implementing the OGP initiative. ¹⁰² The council met three times as an MSF to oversee the process for developing the commitments for this action plan, but only one MSF was held in 2021, falling short of the minimum requirement for meeting at least every six months. ¹⁰³ Due to COVID-19 restrictions, no other co-creation events were held. However, one internal and two open public e-consultations were held to ensure the participation of a broader audience. ¹⁰⁴	No	<i>To be assessed in the Results Report</i>
2.1 OGP website: There is a publicly accessible website ¹⁰⁵ that contains the latest action plan. ¹⁰⁶ It also contains details on the co-creation process for all action plan cycles, including minutes of meetings and links to public e-consultations.	Yes	<i>To be assessed in the Results Report</i>
2.2 Repository: The OGP website serves as a repository that is regularly updated with information on co-creation. ¹⁰⁷ Also, information on implementation of previous action plans is only present in the form of government self-assessment reports, which are available for download for each cycle. ¹⁰⁸	Yes	<i>To be assessed in the Results Report</i>

<p>3.1 Advanced notice: The government did not publish a two-week notice on the OGP website/repository, meaning the process fell short of the minimum requirement. A timeline of the development of the new action plan was communicated and presented at the start of the process, as one of the agenda items of the Sixth Council session.¹⁰⁹</p>	No	Not applicable
<p>3.2 Outreach: The government held an internal e-consultation with MSF stakeholders, but there was no outreach activity carried out to provide information on OGP and opportunities to get involved for other stakeholders, primarily due to COVID-19 restrictions. However, two public e-consultations were held.</p>	No	Not applicable
<p>3.3 Feedback mechanism: The government used the public e-consultation mechanism twice to gather input from a range of stakeholders. Each public e-consultation was available for comment for a three-week period.¹¹⁰</p>	Yes	Not applicable
<p>4.1 Reasoned response: Minutes from OGP Council meetings include details on the discussions about whether to include commitments in the action plan following the internal and public consultation processes.¹¹¹ Reports on those processes also give a reasoned response to all comments received during consultation, which are available on the e-consultation website.¹¹²</p>	Yes	Not applicable
<p>5.1 Open implementation: IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.</p>	Not applicable	<i>To be assessed in the Results Report</i>

¹⁰⁰ 2021 OGP Participation and Co-Creation Standards: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

¹⁰¹ IRM Guidelines for the Assessment of Minimum Requirements:

<https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>

¹⁰² "Savjet inicijative Partnerstvo za otvorenu vlast" (Ured za udruge Vlade Republike Hrvatske, 23 September 2022), <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

¹⁰³ "Arhiva zapisnika sa sjednica Savjeta inicijative Partnerstvo za otvorenu vlast" (Ured za udruge Vlade Republike Hrvatske, 23 September 2022), <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

¹⁰⁴ The open e-consultation results were available at the e-Consultations portal in June 2020. After the final draft of the new action plan was developed, another round of public consultation was conducted at the end of 2021:

- from 9 June to 1 July 2020: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=14337>
- from 10 December 2021 to 3 January 2022: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=19426>

¹⁰⁵ "Partnerstvo za otvorenu vlast" (Ured za udruge Vlade Republike Hrvatske, 23 September 2022), <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/271>

¹⁰⁶ "Akcijski plan za provedbu inicijative Partnerstvo za otvorenu vlast za razdoblje 2022.-2023. godine" (Ured za udruge Vlade Republike Hrvatske, 23 September 2022), <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/akcijski-plan-za-provedbu-inicijative-partnerstvo-za-otvorenu-vlast-za-razdoblje-2022-2023-godine/5165>

¹⁰⁷ "Partnerstvo za otvorenu vlast" (Ured za udruge Vlade Republike Hrvatske, 23 September 2022), <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/271>

¹⁰⁸ 2012–2013 action plan: <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/akcijski-plan-za-provedbu-inicijative-partnerstvo-za-otvorenu-vlast-u-republici-hrvatskoj-za-razdoblje-2012-2013/290>; 2014–2016 action plan: <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/akcijski-plan-za-provedbu-inicijative-partnerstvo-za-otvorenu-vlast-u-republici-hrvatskoj-za-razdoblje-2014-2016/3080>; 2018–2020 action plan: <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/akcijski-plan-za-provedbu-inicijative-partnerstvo-za-otvorenu-vlast-u-republici-hrvatskoj-za-razdoblje-do-2020-godine/4898>.

¹⁰⁹ The meeting was held on 15 December 2020: <https://udruge.gov.hr/UserDocsImages//dokumenti//Zapisnik%20-%206.%20sjednica%203.%20saziva%20Savjeta%20inicijative%20POV%20-%203.%20mandat.pdf>.

¹¹⁰ The open e-consultation results were available at the e-Consultations portal in June 2020. After the final draft of the new action plan was developed, another round of public consultation was conducted at the end of 2021:

- From 9 June to 1 July 2020: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=14337>
- From 10 December 2021 to 3 January 2022: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=19426>

¹¹¹ "Savjet inicijative Partnerstvo za otvorenu vlast" (Ured za udruge Vlade Republike Hrvatske, 23 September 2022), <https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

¹¹² The first public e-consultation report is available at:

<https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=14337>; the second public e-consultation report is available at: <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=19426>